

**GOVERNMENT OF PUERTO RICO  
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU**

**NEPR**  
**Received:**  
**Mar 2, 2026**  
**6:09 PM**

**IN RE:** REQUEST FOR CERTIFICATION  
SUNSTRONG MANAGEMENT LLC

**CASE NO.** NEPR-CT-2025-0012

**SUBJECT:** Resolution and Order regarding Motion in Compliance with January 15, 2026 Resolution, Request for Extension, and Request for Guidance filed by SunStrong Management, LLC

**MOTION IN COMPLIANCE WITH JANUARY 30, 2026 RESOLUTION**

**TO THE HONORABLE ENERGY BUREAU:**

**COMES NOW**, SunStrong Management LLC (“SunStrong”), by and through the undersigned legal counsel, respectfully submits the following:

**I. INTRODUCTION**

1. On December 3, 2025, the Energy Bureau issued a Resolution and Order directing SunStrong to submit adjustments providing additional detail and clarity to its customer complaint procedure to ensure alignment with Section 6.03 of Regulation 2026 9246, as well as proof of publication of such procedure (the “December 3 Resolution”).
2. On January 12, 2026, SunStrong submitted its *Motion in Compliance with December 3 Resolution and order* explaining that it is currently operating under a complaint procedure previously approved by the Energy Bureau in connection with Sunnova Energy Corporation’s certification as a Demand Response Aggregator, and that such procedure remains in effect pursuant to Section 6.03(A)(1) of the *regulation for Demand Response*, dated December 21, 2020 (“Regulation 9246”).
3. On January 15, 2026, the Energy Bureau issued a Resolution granting SunStrong five (5) additional days to comply with the December 3 Resolution.

4. On January 20, 2026, SunStrong Management, LLC filed a motion with the Puerto Rico Energy Bureau, outlining its efforts to enhance its customer complaint procedure under Section 6.03 of Regulation 9246 to improve transparency, structure, and clarity while adhering to the existing regulatory framework. Therein, SunStrong requested a 60-day extension to finalize and publish the updated procedure, stating it would continue using the current procedure during the transition.
5. On January 30, 2026, the Energy Bureau issued a Resolution and Order granting SunStrong a thirty-day (30-day) extension from the notification date of the resolution to submit the updated procedure and evidence of its publication.
6. Section 6.03 of Regulation 9426 states as follows:

A) Before enrolling customers in a DR program, each DR Program Provider shall develop and publish a procedure for addressing any complaints a Customer may have regarding the DR services or compensation provided to the Customer. The procedure shall clearly describe the process through which a Customer may file any complaint or grievance with the DR Program Provider and the process through which the DR Program Provider will address said complaint or grievance, including the time period within which such complaints or grievances will be addressed.

- 1) A DR Program Provider with a pre-existing complaint procedure that has been approved by the Energy Bureau may use that procedure until it develops a complaint procedure fully aligned with this regulation. When it begins implementation of a DR program, such provider shall propose to the Energy Bureau the timeline for updating its complaint procedure to be fully aligned with this regulation, or shall explain why it believes that its preexisting procedure is fully aligned with this regulation.
- 2) Each DR Program Provider's complaint procedure shall include information regarding how to contact the Independent Consumer Protection Office.

B) The procedure must include processes for investigation and resolution of complaints by a Customer whose private or proprietary information may have been sold by the DR Program Provider or disclosed by the DR Program Provider to market services or product offerings in violation of this Article.

C) Any Customer dissatisfied with a determination made by the DR Program Provider in relation to a complaint or grievance made under this Section may file a complaint with the Energy Bureau for review of such determination by the DR Program Provider. Such complaint shall be filed under Regulation 8543.

7. SunStrong hereby complies with Section 6.03 of Regulation 9426, and submits the following complaint procedure (**Attachment 1**), which:

- (i) Designates a clear and exclusive channel for the submission of complaints through the email address [support@sunstrongmanagement.com](mailto:support@sunstrongmanagement.com), requiring the subject line “BEDRP Complaint”;
- (ii) Establishes a defined filing deadline requiring customers to submit complaints within thirty (30) days of the event giving rise to the grievance;
- (iii) Specifies the required contents of a complaint, including: (a) the customer’s name and contact information; (b) the date of the complaint; (c) a detailed description of the issue or request; (d) identification of the relevant program or service; and (e) any supporting documentation, if applicable;
- (iv) Provides defined response and investigation timelines, including an acknowledgment and initial response within two (2) to four (4) business days, and investigation and resolution within three (3) months of receipt, subject to reasonable extension where necessary;
- (v) Establishes procedures for the handling of complaints involving private, confidential, or proprietary information, ensuring such matters are managed in accordance with appropriate confidentiality safeguards;
- (vi) Informs customers of their right to escalate unresolved complaints to the Puerto Rico Energy Bureau pursuant to Regulation 8543;
- (vii) Provides customers with contact information for the Independent Consumer Protection Office (OIPC);

- (viii) Implements a standardized complaint submission form accessible through SunStrong's website, with internal routing to the appropriate subject matter expert, including matters related to virtual power plant or demand response operations;
- (ix) Clarifies internal review, documentation, and escalation protocols consistent with Regulations 9426 and 8543; and
- (x) Is published on SunStrong's website and provided directly to customers as part of their BEDRP service agreement. More specifically, a PDF is hosted and hyperlinked on the SunStrong Management Virtual Power Plant Puerto Rico Support Page, which can be found here: [Virtual Power Plant \(VPP\) Support – SunStrong Management](#). Furthermore, SunStrong plans to send these terms directly to customers later in March.

8. SunStrong remains committed to full regulatory compliance and to ensuring that customers have clear, transparent, and effective mechanisms for addressing complaints related to Demand Response services.

9. SunStrong requests that confidential treatment be afforded to this motion and its corresponding attachment. Section 6.15 of Act No. 57 of May 17, 2014, as amended, 22 LPRA § 1054n, provides:

If any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Bureau] to treat such information as such, subject to the following:

(a) If the Energy [Bureau], after the appropriate evaluation, believes such information should be protected, it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.

(b) To such purposes, the Energy [Bureau] shall provide access to the document or the privileged portion of the document only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.

(c) The Energy [Bureau] shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the Energy [Bureau] who needs to know such information under nondisclosure agreements. However, the Energy [Bureau] shall direct that a non-confidential copy be furnished for public review.

(d) The Energy [Bureau] shall swiftly act on any privilege and confidentiality claim made by a person subject to its jurisdiction by means of a resolution to such purposes before any allegedly confidential information is disclosed.

10. SunStrong respectfully requests that all the information contained in this motion and attached hereto be kept confidential in accordance with Section 1.15 of Regulation 8701. In compliance with the process to designate confidential information, SunStrong hereby includes redacted versions of the documents for which confidential treatment is sought (**Attachment 1**). These documents have sensitive information, otherwise not available to the public, which SunStrong prefers not to disclose and that could place it at a competitive disadvantage. Moreover, Table 1 below contains a list of all the documents including information for which confidential treatment is requested.

Table 1				
Document Name	Page	Date	Legal Basis	Discussion
<b>Master Services Agreement (Attachment 1)</b>	Totality of Attachment 1	3/2/26	<ul style="list-style-type: none"> <li>Act No. 57-2014, § 6.15</li> <li>Regulation 8701, § 1.15</li> </ul>	This document contains sensitive information which should not be available to the public. The disclosure of this information would place SunStrong at a competitive disadvantage with

Table 1				
Document Name	Page	Date	Legal Basis	Discussion
				respect to other market participants and cause it economic harm.

11. SunStrong respectfully requests that this Honorable Energy Bureau only grant access to said information to internal Energy Bureau personnel, counsel, and consultants subject to the execution of a confidentiality agreement.

**WHEREFORE**, SunStrong respectfully requests that the Energy Bureau: (1) Declare Sunstrong in compliance with the December 3, 2025, January 15, 2026 and January 30 Resolutions; (2) Approve Sunstrong's complaint procedure and declare it consistent with Section 6.03(A)(1) of Regulation 9246; and (3) Grant confidential treatment to the document attached hereto.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of March 2026.

**McCONNELL VALDÉS LLC**  
*Counsel for SunStrong Management LLC*  
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[apc@mcvpr.com](mailto:apc@mcvpr.com)

# **ATTACHMENT 1**

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### 11. VPP Complaint Procedure

Complaints regarding the VPP Program should be submitted to:

SunStrong Management LLC

Email: [support@sunstrongmanagement.com](mailto:support@sunstrongmanagement.com)

Address: 20 Greenway Plaza, Suite 540, Houston, TX 77046-4845

Attn: [            ]

Please include Your Full Name and “CBES Complaint” in the subject line. SunStrong will acknowledge receipt and aims to resolve complaints within thirty (30) days.

Should your complaint concern the disclosure of private or proprietary information that may have been sold or disclosed by the Aggregator to market services or product offerings, SunStrong will investigate such complaint. The timeline for investigation and resolution of such complaint will be approximately three (3) months, subject to extension in the event information necessary for the investigation is not readily available.

If You are dissatisfied with SunStrong’s determination, You may file a complaint with the Puerto Rico Energy Bureau. Such grievance will be resolved in accordance with the procedures set forth under Regulation 8543, available at <https://energia.pr.gov/wp-content/uploads/sites/7/2015/09/RE-8543-EN1.pdf> . A version of these procedures is available in Spanish at <https://energia.pr.gov/wp-content/uploads/sites/7/2015/09/RE-8543-ES.pdf>. Moreover, please be aware that you are entitled to reach out to the Independent Consumer Protection Office by phone at (787) 523-6962 or by email at [info@oipc.pr.gov](mailto:info@oipc.pr.gov).

The above complaint procedure refers exclusively to complaints related to this MSA and the CBES program, and does not govern disputes related to your Customer Agreement, which disputes will be resolved per the terms therein. The filing of a complaint shall not release You from any obligations under this MSA.

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