

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

NEPR Received: Mar 4, 2026 6:33 PM
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IN RE: REQUEST FOR CERTIFICATION
SUNSTRONG MANAGEMENT LLC

CASE NO. NEPR-CT-2025-0012

SUBJECT: Gross Revenue Report as a
DR Aggregator

**MOTION TO REQUEST CONFIDENTIAL TREATMENT OF
GROSS REVENUE REPORT**

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 November 13, 2025, the Honorable Energy Bureau of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) issued a *Resolution and Order* certifying SunStrong as a Demand Response Aggregator under the special circumstances of the Transition period Plan and LUMA’s Emergency Demand Response Program.
2. Pursuant to Section 2.02 of the Regulation for Demand Response, Regulation 9246 of December 10, 2020 (“Regulation 9246”), DR Aggregators must be certified pursuant to the processes established in *Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico, Regulation 8701 of the 17th of February 2016*, as amended (“Regulation 8701”).

3. Section 4.02(B) of Regulation 8701 mandates all electric service companies operating in Puerto Rico to whom the Honorable Energy Bureau has issued a Certification to inform the Energy Bureau of their annual gross revenue.
4. SunStrong hereby complies with Section 4.02(B) of Regulation 8701 by informing the Honorable Energy Bureau of its gross revenue as a DR Aggregator for fiscal year 2025 and submitting the Gross Revenue and Financial Statements Form and its corresponding Gross Revenues Exhibit (**Attachment 1**).

5. [REDACTED]

6. 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 L.P.R.A. § 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.

7. In turn, Section 1.15 of the Regulation No. 8701 provides that when a person who is required to submit information to the Energy Bureau considers such information to be privileged or confidential, the person shall identify the information it deems privileged or confidential, request the Energy Bureau to protect such information, and present arguments supporting the privilege or confidentiality claim. The Energy Bureau shall evaluate the petition and, if it concludes the information merits protection, it shall proceed pursuant to Section 6.15 of Act No. 57.

8. SunStrong respectfully requests that all the information contained in the attachment 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 and unredacted versions of the document for which confidential treatment is sought (**Attachment 1**).

Document Name	Page	Date	Legal Basis	Discussion
Gross Revenues Exhibit	Page 3 of Attachment 1	3/2/26	<ul style="list-style-type: none"> Act No. 57-2014, § 6.15 	This document contains sensitive information which should not be available

Document Name	Page	Date	Legal Basis	Discussion
(Attachment 1)			<ul style="list-style-type: none"> Regulation 8701, § 1.15 	to the public. The disclosure of this information would place SunStrong at a competitive disadvantage with respect to other market participants and cause it economic harm.

9. 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:

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on March 2, 2026.

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ATTACHMENT 1



GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board
Puerto Rico Energy Bureau

FORM

GROSS REVENUE AND FINANCIAL STATEMENTS REPORT
ELECTRIC POWER COMPANIES

Instructions:

- When filling out this form, examine the provisions of Section 4.02 of Regulation No. 8701 and be sure to provide all the required information.
Indicate N/A where the information is not applicable.
Use Complementary Sheet (NEPR-Z01) if additional space is required.
Include the required documents according to the Regulation No. 8701, enumerated in the Annexes section.

Electric Power Company General Information

- 1. Company Name: SunStrong Management LLC
2. Fiscal Year of presented information: 2025

Information of Gross Revenue of the Electric Power Company

- 1. Gross Revenue generated during the last fiscal year: [Redacted]
2. Identify the portion of the revenue corresponding to subsidiaries of the parent company, that are electric power companies:

Annexes: (Mark the documents included with the Gross Revenue and Financial Statements Form)

- Compiled financial statements (Section 4.02 (D)).
Audited financial statements (Section 4.02 (E)).
Complementary Sheet (NEPR-Z01).
Other: _____

I certify that the presented information on this form is correct and complete.

[Redacted] [Redacted] [Redacted] February 19, 2026
Name of Designated Contact Position Signature Date



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NEPR- B05 (Rev. January 2019) "Gross Revenue and Financial Statements Report"

Reference: Amendment to Regulation No. 8618, on Certification, Annual Fees, and Operational Plans for Electric Power Companies in Puerto Rico.

