

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

**NEPR**

**Received:**

**Apr 17, 2026**

**1:30 PM**

**IN RE: COMMUNITY SOLAR  
REGULATORY FRAMEWORK**

**CASE NO. NEPR-MI-2025-0003**

**SUBJECT: LUMA's Notice of Intent to  
Participate**

**NOTICE OF INTENT TO PARTICIPATE AND NOTICE REGARDING  
APRIL 10, 2026 INVITATION FOR COMMENTS**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW, LUMA ENERGY, LLC** as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, "LUMA"), through the respective undersigned legal counsel and respectfully state and submit the following:

1. On April 10, 2026, the Puerto Rico Energy Bureau (the "Energy Bureau") issued a Resolution (the "April 10 Resolution") reinitiating a proceeding to establish the regulatory framework that will guide the development of regulations for community solar projects. The Bureau explained that it intends to gather information and begin discussions, with the goal of producing a draft report and an outline of proposed regulations to ultimately support a formal rulemaking process.

2. In the April 10 Resolution, the Bureau invited comments and feedback in response to the questions set forth in Attachment A, to be submitted on or before April 17, 2026. The Bureau also welcomed additional information and requests for clarification, as appropriate.

3. LUMA recognizes that community solar and related distributed energy models are evolving rapidly and that thoughtful stakeholder input can help the Energy Bureau develop durable, workable rules that serve the public interest while protecting system reliability and safety.

4. LUMA must also be candid and respectful in advising the Bureau that, given the short timeframe between the April 10 Resolution and the April 17 deadline (5 business days), LUMA is not in a position to provide meaningful and complete responses to the questions in Attachment A at this moment.

5. This is not, and should not be taken as, a reflection of unwillingness to participate. Rather, LUMA's subject-matter personnel and counsel who would be responsible for developing technically accurate, useful responses are simultaneously engaged in multiple ongoing regulatory proceedings, mainly pending before the Bureau, with overlapping, ongoing and near-term obligations and deadlines. By way of example, LUMA is concurrently working on (i) responses to requests for information and other filings in *In re: Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, NEPR-AP-2023-0004; (ii) evaluation of the *Final Order on Electricity Rates in the Puerto Rico Electric Power Authority Rate Review* issued and notified in the matter of *In Re: Puerto Rico Electric Power Authority Rate Review*, NEPR-AP-2023-0003, issued April 15, 2026, which requires substantial review in advance of the deadline to seek reconsideration; (iii) ongoing work relating to interconnection regulations in *In re: Interconnection Regulations*, NEPR-MI-2019-0009, with an extensive set of comments submitted on Wednesday, April 15, 2026, and (iv) responses to more than thirty (30) questions, with additional subparts, to be answered on April 20, 2026 in the matter of *In Re: Energy Efficiency and Demand Response Three Year Plan*, NEPR-MI-2026-0002. The internal teams who would manage and vet the topics raised by Attachment A necessarily overlap with those responsible for these parallel matters.

6. In LUMA's view, submitting rushed or incomplete responses would not be helpful to the Bureau or the development of a sound framework. LUMA therefore believes it is more appropriate and respectful to provide transparent notice now that LUMA cannot participate in this initial

comment step, rather than submit responses that are necessarily partial, underdeveloped, or insufficiently coordinated across relevant technical and operational teams.

7. Notwithstanding the foregoing, LUMA remains interested in participating actively in this proceeding as it moves forward. In particular, LUMA is prepared to contribute operational and technical perspectives relevant to the safe and reliable planning and operation of the transmission and distribution system (“T&D System”), including identifying practical implementation considerations and potential overlaps with other Bureau initiatives, such as the Energy Bureau’s work in *In re: Interconnection Regulations*, NEPR-MI-2019-0009.

8. LUMA respectfully requests that the Bureau take notice of this filing as confirmation that LUMA does not intend to submit responses to Attachment A by April 17, 2026, but intends to participate in subsequent stages of this proceeding as the Energy Bureau continues its information-gathering and framework-development work, provided that sufficient notice and opportunity are afforded in those later steps. Should the Bureau provide a reasonable additional period for the initial Attachment A questions, LUMA may also be able to contribute to that first set of questions.

9. LUMA appreciates the Energy Bureau’s consideration and reiterates its commitment to engage in good faith and cooperate with the Energy Bureau in the development of regulations for community solar projects and related distributed energy resources, in a manner that supports the public interest and maintains system reliability.

**WHEREFORE**, LUMA respectfully requests that this Energy Bureau take notice of the foregoing.

**RESPECTFULLY SUBMITTED.**

In Guaynabo, Puerto Rico, this April 17<sup>th</sup>, 2026.



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## CERTIFICATE OF SERVICE

**WE HEREBY CERTIFY** that this motion was filed using the electronic filing system of this Energy Bureau and that we will send a courtesy electronic copy of this Motion to [pjcleanenergy@gmail.com](mailto:pjcleanenergy@gmail.com); [hola@alianzadejusticiaenergetica.org](mailto:hola@alianzadejusticiaenergetica.org); [vmaldonado@midapr.com](mailto:vmaldonado@midapr.com); [mpineda@martinpena.pr.gov](mailto:mpineda@martinpena.pr.gov); [mnunez@martinpena.pr.gov](mailto:mnunez@martinpena.pr.gov); [mitiempo2004@gmail.com](mailto:mitiempo2004@gmail.com); [cmuniz@martinpena.pr.gov](mailto:cmuniz@martinpena.pr.gov); [minirio@martinpena.pr.gov](mailto:minirio@martinpena.pr.gov); [ysantiago@martinpena.pr.gov](mailto:ysantiago@martinpena.pr.gov); [grace@fideicomisomartinpena.org](mailto:grace@fideicomisomartinpena.org); [carolynt@eco-energy.com](mailto:carolynt@eco-energy.com); [chance@powersolarpr.com](mailto:chance@powersolarpr.com); [humberlinkedin@gmail.com](mailto:humberlinkedin@gmail.com); [dortiz@solarunitedneighbors.org](mailto:dortiz@solarunitedneighbors.org); [sgbell@solarunitedneighbors.org](mailto:sgbell@solarunitedneighbors.org); [carlosv@irecusa.org](mailto:carlosv@irecusa.org); [ramonantonio1234@outlook.com](mailto:ramonantonio1234@outlook.com); [yelitza.torres@ddec.pr.gov](mailto:yelitza.torres@ddec.pr.gov); [gerardo.rodriguez@ddec.pr.gov](mailto:gerardo.rodriguez@ddec.pr.gov); [ada.quiles@ddec.pr.gov](mailto:ada.quiles@ddec.pr.gov).

*/s/ Javier Alfredo Arroyo-Plaza*  
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