# Electric Vehicle Association of Puerto Rico

*An EV-driver membership organization*

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From: douglas davis <dadavlieu@gmail.com>
Sent: Monday, April 27, 2026 7:51 PM
To: Comentarios <comentarios@jrsp.pr.gov>
Subject: Public comments on 2026-28 EE and DR Plan - EVAPR_Apr282026_filing

Honorable Chairman and Associate Commissioners
Puerto Rico Energy Bureau
Public Service Regulatory Board
San Juan, Puerto Rico

**Re:** Stakeholder Comments, Case No. NEPR-MI-2026-0002
LUMA Energy's Proposed 2026–2028 Energy Efficiency and Demand Response Three-Year Plan

Commissioners,

These comments come from the people who actually drive electric cars in Puerto Rico. The Electric Vehicle Association of Puerto Rico (EVAPR) is a driver-led membership organization. Our members own EVs, plug them in at home each night, pay LUMA's electric bills every month, and notice — sometimes more quickly than anyone else — what is and isn't working in this Island's EV programs. We are writing because the Three-Year Plan now before the Bureau, as supplemented by LUMA's April 20, 2026 filing, is the single most consequential EV-related decision your Board will make this year. The version filed on March 2 said almost nothing about EVs. The supplemental filing has begun to correct that. Our concern is that, between today and the Bureau's order, EVs not slip back to the margin again.

We have kept our comments narrow on purpose. EVAPR does not address the full range of issues raised in the Plan; other intervenors are better placed to comment on residential rebates, EM&V, financing, the 30%-by-2040 trajectory, and the like. Our focus is the EV piece. Five short sections follow: an introduction to EVAPR (Section I), why we believe the Plan must include EVs (Section II), what the Bureau should learn from the Interim Electric Vehicle Time-of-Use Pilot now playing out in Case No. NEPR-MI-2021-0013 (Section III), what comparable utilities elsewhere in the United States have learned about EV programs that work (Section IV), and our specific recommendations (Section V).

## I. About EVAPR

EVAPR is a chapter-style EV driver organization, in the tradition of the Electric Vehicle Association and Plug In America on the U.S. mainland. We do not sell vehicles, we do not install chargers, we do not aggregate batteries. Our members are the EV-owning households of Puerto Rico — the people who feel both the benefits and the friction of every EV-related rule, rate, and program LUMA introduces. We file these comments as drivers.

## II. Why this Plan needs to address EVs

Four points, briefly.

**First: an EV is a battery.**

A modern electric car carries 60 to 100 kilowatt-hours of usable energy storage. That is fifteen to twenty times the capacity of a typical CBES-class home battery. Every EV that lands in Puerto Rico arrives with a sizable battery that, with the right hardware and the right program design, can support its owner during outages, support the grid, and support the broader energy efficiency goals this Plan exists to advance.

**Second: EVs are arriving.**

Tesla operates retail and service in San Juan. Hyundai, Kia, Ford, GM, and BMW EVs are visible in growing numbers across the Island. The U.S. Department of Energy's PR100 study and LUMA's own Integrated Resource Plan now treat EV load as a real planning input. The opportunity to shape that load before it materializes is now, before it is locked in as uncoordinated nighttime peak.

**Third: EVs are uniquely complementary to Puerto Rico's solar and storage build-out.**

There are roughly 171,000 distributed home batteries already installed across the Island, and rooftop solar accounts for about twenty percent of total generation capacity. The natural place to put EV load is daytime, when the rooftop solar fleet is generating, and that happens to coincide with the off-peak window LUMA itself defined under the Interim EV TOU rate (9 a.m. to 5 p.m.). A program built around that coincidence creates value for customers, for the grid, and for the EE/DR portfolio this Plan funds.

**Fourth: EVs are a resilience asset, and Puerto Rico knows what resilience is worth.**

After Hurricane Fiona, one major Puerto Rico solar installer reported that approximately 97% of its 30,000 customers retained power. A typical EV battery, paired with bidirectional charging hardware, can power a typical home for three to ten days. The case for treating that as a near-term planning asset is stronger here than in almost any other U.S. jurisdiction.

## III. The Interim EV TOU Pilot is a cautionary tale

Puerto Rico already has, on the Island, direct experience with a utility-led EV program. The record of that experience lives in Case No. NEPR-MI-2021-0013, and the headline numbers are sobering.

Per LUMA's own semi-annual reports in that docket, the Interim EV TOU Rate had 27 enrolled customers as of December 31, 2024 (six months after launch), and 125 enrolled customers and 139 enrolled vehicles as of December 31, 2025. Eighteen months in, fewer than 150 Puerto Rico EV drivers were participating. By the benchmarks we cite in Section IV, that is not a pilot ramping toward viability. It is a program that has not been seriously marketed.

The Bureau's January 7, 2026 Resolution and Order in NEPR-MI-2021-0013 already documented several of the structural failures behind those numbers. We list the ones that bear directly on this Plan.

**(1)** Operational data was missing. The Bureau had to demand workpapers, load profiles, cost analyses, and complete timestamps that LUMA had not been gathering or reporting on its own.

**(2)** The peak and off-peak windows were not validated against actual Puerto Rico load shapes or solar-generation profiles.

**(3)** The Charging Behavior Study originally proposed to inform Net Energy Metering planning was discontinued in LUMA's November 3, 2025 Revised PR-EVAP, removing one of the only empirical inputs any future EV demand response program would rely on.

**(4)** LUMA could not show that the billing and metering infrastructure underlying the rate had been completed.

**(5)** The proposed $189,000 annual outreach budget had no marketing strategy attached to it that would explain how those funds will be used differently than they have been historically.

**(6)** Equity and low-income access were not addressed in any specific way.

**(7)** Vehicle-to-grid technology readiness, and the feasibility of smart and managed charging during the next three fiscal years, had to be asked about by the Bureau because LUMA had not addressed them.

We are not relitigating that docket here. The point is narrower: the Three-Year Plan is the next opportunity to make sure these problems are not repeated when an EV demand response program is added to LUMA's portfolio. If the lessons of the EV TOU pilot are not applied here, the Bureau will be funding the same failure twice.

**A note on what the lesson is, and isn't.**

The Interim EV TOU rate did not fail because the rate was the wrong shape, or because WeaveGrid is the wrong implementation partner, or because Puerto Rico EV drivers are uninterested. It failed because the program was treated as a tariff to be filed rather than a program to be launched. The marketing strategy was thin. The connection to the EV-buyer journey (auto OEMs, dealers, solar installers, fleet operators) was thin. The data collection plan was thin. EVAPR members report being told about the rate by other EV drivers, and sometimes by their installer, rather than by LUMA. That is the lesson the Three-Year Plan most needs to absorb.

## IV. What works elsewhere

Five lessons stand out from utility EV programs in the rest of the United States.

**(1) Pay-for-performance managed charging beats bare TOU rates.**

PSEG Long Island's Smart Charge Rewards program pays $0.05 per kilowatt-hour for off-peak charging delivered through the customer's smart charger and has enrolled tens of thousands of drivers. Consolidated Edison's SmartCharge New York pays per-kWh incentives for off-peak charging through a third-party platform, with monthly settlement. Pacific Gas and Electric's ChargeForward program

controls charging via vehicle telematics and has piloted both demand response and renewable integration. These programs grow faster than bare TOU rates in part because the platform handles the price signal so the customer does not have to. They also do not depend on completed billing-system upgrades, which is directly relevant given the Bureau's concern in NEPR-MI-2021-0013 that LUMA cannot today offer a TOU rate without further metering work.

**(2) Bidirectional charging is not speculative anymore.**

Pacific Gas and Electric launched a vehicle-to-everything pilot in March 2025 with General Motors, with eligibility for 2024-model GM EVs (Silverado EV, Equinox EV, Blazer EV, Cadillac Lyriq, GMC Sierra EV) and announced expansion to all 2025 model-year GM EVs. National Grid, San Diego Gas & Electric, Baltimore Gas & Electric, and Dominion Energy run their own V2G pilots, several involving electric school buses. BMW and E.ON are launching commercial vehicle-to-grid in Germany in 2026 with the BMW iX3. Vehicle-to-load capability is already a standard feature on Hyundai, Kia, Ford F-150 Lightning, and GM Ultium-platform EVs, and EV owners on the U.S. mainland have used it as ad hoc emergency power in hurricane and wildfire events. The DERMS this Plan funds should treat all of this as in scope, not as future work.

**(3) Equity tiers are not optional.**

California's Self-Generation Incentive Program offers $850 per kWh in its Equity tier and $1,000 per kWh in its Equity Resiliency tier specifically because, without those tiers, the program's benefits flow to higher-income customers and the public-policy basis for ratepayer funding weakens. Any EV component of the Three-Year Plan should have an equivalent design feature. The Bureau already raised this issue in the EV docket; the same standard should carry over here.

**(4) Coordinate with rooftop solar and home batteries, not against them.**

Many of the next Puerto Rico households to buy an EV will already have rooftop solar and a CBES-enrolled battery. That is the highest-value managed-charging customer segment available anywhere in the country. The CBES aggregator infrastructure that LUMA already runs, the DERMS platform this Plan will fund, and the new Economic Demand Response program LUMA proposed in its April 20 supplemental filing are the right places to integrate EV load. A household with co-located solar, a CBES-enrolled battery, and an EV should be one program participant, not three.

**(5) Programs have to be marketed.**

The Smart Electric Power Alliance reports that 60% of utilities cite uncertainty about EV customer participation as the largest barrier they face in launching managed charging programs. Industry research shows that, as of 2024, only 24% of U.S. EVs were enrolled in any managed charging program. The reason is almost never that the program is unattractive. It is that drivers do not know it exists, do not understand how to enroll, or do not believe the value proposition is real. Puerto Rico is the same. Marketing through auto OEMs, EVSE manufacturers, dealers, solar installers, fleet operators, and (we would offer) EVAPR is what closes that gap.

## V. What we are asking the Bureau to do

EVAPR asks the Bureau, in its order on the Three-Year Plan, to require LUMA to do the following seven things.

**1. Treat EVs as a named, budgeted resource in the Plan.**

Identify EVs explicitly, with a budget line and milestones, as a near-term EE/DR resource for FY2027 and FY2028. Not a footnote, not a deferred concept, not a question for the next plan cycle.

**2. Authorize the design and pilot deployment of an EV demand response program during the FY2027–FY2028 period.**

Include explicit budget flexibility and pre-authorized authority so that LUMA, on Bureau approval of the specific design, can launch the pilot during the Plan period without reopening the Plan or waiting for the next cycle. Structure the pilot as a pay-for-performance managed charging program (per-kWh off-peak credit through the customer's smart charger or vehicle telematics), running alongside (not replacing) the Interim EV TOU rate.

**3. Require a public lessons-learned review of the Interim EV TOU Pilot, filed in this docket within 60 days of Plan approval.**

The review should cover enrollment by month, region, income tier, and enrollment pathway (Tesla, ChargePoint, Wallbox); observed load-shift performance; outreach effectiveness against the $189,000 outreach budget; metering and billing implementation issues; the data the discontinued Charging Behavior Study would have produced; and explicit recommendations for the EV demand response pilot design. Coordinate with the open record in NEPR-MI-2021-0013.

**4. Build bidirectional EV capability into the DERMS roadmap.**

The DERMS funded by the Plan should treat EVs as a class of distributed energy resource on the same footing as residential CBES batteries, with technical interfaces for vehicle-to-grid, vehicle-to-home, and vehicle-to-everything dispatch, signaling, settlement, and reporting. EVAPR is prepared to participate in scoping discussions on this point.

**5. Reverse the proposed discontinuation of the Charging Behavior Study, and fund it within the Plan.**

The Study is the empirical record any future EV demand response program will rely on. Cancelling it before the EV TOU rate has run for two full years is the wrong call. EVAPR is prepared to assist with study design and member recruitment.

**6. Reserve a defined share of EV program incentives for low-income and medically vulnerable customers.**

Set a numerical floor (we suggest no less than 25%, mirroring the EE Regulation), report participation by income tier each quarter, and coordinate with the Department of Economic Development and Commerce, public housing authorities, the Puerto Rico Green Energy Trust, and the Low-Income Assistance Initiative described in LUMA's response to Q20 of the April 20 supplemental filing.

**7. Establish a recurring EV stakeholder working group.**

The group should meet at least quarterly throughout FY2027–FY2028 and include EVAPR, the existing CBES aggregators, SESA Puerto Rico, EVSE manufacturers, and auto OEMs active in Puerto Rico. Its role is to inform program design, marketing, and lessons-learned reporting, and to surface friction early enough to be fixed.

EVAPR thanks the Bureau for the opportunity to comment, and for the seriousness with which it has already engaged the EV-related issues in NEPR-MI-2021-0013. We are available for any technical conferences, working sessions, or follow-up questions that may help.

Sincerely,

**Doug Davis**
President
Electric Vehicle Association of Puerto Rico