

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

In Re:

INTERCONNECTION REGULATIONS

Case No. NEPR-MI-2019-0009

**Subject: Comments on Proposed
Generating Facility and Microgrid
Interconnection Regulation - Case No. NEPR-
MI-2019-0009**

To the Honorable Edison Aviles Deliz, Chairman:

Enphase Energy, Inc. (“Enphase”) respectfully submits the following comments pursuant to the Puerto Rico Energy Bureau’s (“PREB” or “Energy Bureau”) April 27, 2026 *Resolution and Order* inviting new inputs and feedback from stakeholders in advance of issuing a draft interconnection regulation by July 7, 2026.

Enphase is a leading manufacturer of solar microinverters and battery storage systems and SESA member company, whose products are deployed in a significant majority of existing residential solar facilities in Puerto Rico. Enphase has been an active participant in Case No. NEPR-MI-2019-0009, directly filing comments in the docket on July 15, 2024, December 11, 2024, and May 7, 2025, as well as contributing to SESA filings.

Additional to the topics addressed in opening comments filed on April 15, 2026 and discussed in the May 28, 2026 stakeholder workshop, which were required by Resolución Conjunta de la Cámara 193, Enphase observes that the PREB has an important opportunity in this interconnection rulemaking to go beyond technical grid management considerations and adopt requirements to directly protect the safety and long-term value proposition for customers that adopt solar and energy storage on the island. While LUMA, OIPC, and SESA’s filings duly focus on grid reliability and DER integration challenges per the requirements of RC 193, the PREB should also establish minimum product quality and warranty standards as a condition of interconnection. Specifically, PREB should require that all solar and battery energy storage products that interconnect for purposes of participation in Net Energy Metering or grid services programs like Customer Battery Energy Sharing (“CBES”) carry a minimum 10-year product or service warranty covering all system equipment. This is consistent with the warranty requirements established in other high solar adoption states like California, e.g., under its Net Billing Tariff. The PREB should also adopt a minimum end-of-warranty-period battery capacity retention guarantee of no less than 70%, which is already standard among leading residential battery manufacturers like Enphase, Tesla, FranklinWh, SolarEdge, and Generac.¹ These requirements would ensure that customers in Puerto Rico who are making significant financial commitments to energy resilience through the purchase and installation of solar and battery equipment, are protected against premature equipment failure and degraded performance over the life of their investment.

Additionally, to help guarantee customer and grid safety, PREB should consider requiring that batteries are listed to UL 9540 as a condition for interconnecting battery energy storage products. UL 9540 is the recognized industry standard for battery system safety, and its

¹ E.g., <https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/General/Warranty/en-us/Powerwall-Warranty-EN.pdf>; <https://enphase.com/download/2025-nov-01-enphase-energy-limited-warranty-battery-10c-10cs>; <https://www.franklinwh.com/document/franklin-home-power-fhp-limited-warranty-for-end-users-en>; <https://knowledge-center.solaredge.com/sites/kc/files/se-home-battery-400v-warranty.pdf>; <https://support.ecobee.com/cleanenergy/s/article/What-Is-the-Warranty-on-My-PWRcell-System>



adoption as an interconnection prerequisite would meaningfully reduce safety risks in residential and commercial settings. This is particularly important given Puerto Rico's building density and the pace of behind-the-meter battery deployment described in LUMA's filing. Together, these consumer protection and safety measures would complement the technical interconnection framework being developed, ensuring that the growth of DERs in Puerto Rico delivers durable value and safety to the customers it is meant to serve.

We appreciate the consideration of these comments and look forward to working with all stakeholders on this important update to Puerto Rico's interconnection regulations.

Respectfully submitted,

I hereby certify that these comments were filed by email to the Puerto Rico Energy Bureau and that a copy of these comments was delivered by electronic mail to: Agustin.Irrizary@upr.edu, javrúa@sesapr.org, hrivera@jrsp.pr.gov, contratistas@jrsp.pr.gov, aconer.pr@gmail.com, john.jordan@nationalpfg.com, lionel.santa@prepa.pr.gov, arivera@gmlex.net, mvalle@gmlex.net, laura.rozas@us.dlapiper.com, valeria.belvis@us.dlpiper.com, julian.angladapagan@us.dlapiper.com, cfl@mcvpr.com, and mgs@mcvpr.com.

A handwritten signature in black ink, appearing to read 'M. Monbouquette'.

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