Response for Community Solar Regulation Framework

CASE NO. NEPR-MI-2025-0003

LUMA

Executive Summary

Community solar may offer long-term theoretical benefits in certain mainland jurisdictions with stable transmission systems, mature wholesale markets, and robust utility-scale interconnection capacity, however its widespread implementation in Puerto Rico remains largely aspirational given the island's current operational, regulatory, and economic realities. Puerto Rico's electric system continues to operate under fragile grid conditions characterized by aging infrastructure, constrained distribution circuits, and limited feeder hosting capacity. Today's The current existing legal framework does not provide adequate regulatory clarity on how maintaintenance of the Puerto Rico Electric Power Authority's (PREPA) transmission and distribution (T&D) assets would be performed, or which party would be responsible for such maintenance, if those assets are used by third-party developers. Unlike mainland states with organized wholesale markets and established virtual net metering frameworks, Puerto Rico lacks a market structure and an electricity system capable of valuing distributed injections at granular locational and temporal levels.

The public policy and Puerto Rico Energy Bureau's (PREB) existing interconnection processes and regulations are already experiencing substantial pressure from rapidly increasing automatic distributed energy resources (DER) interconnection, and operational concerns related to voltage violations and other system safeguards. Not to mention the recent public policy decision to order LUMA to cease charging fees for supplementary studies, as a consequence: hampers LUMA's ability to evaluate the impacts of DERs at a feeder level. Expanding community solar absent significant grid modernization investments, advanced distribution management systems, updated hosting capacity analyses, and clear cost-allocation mechanisms risk exacerbating cross-subsidization concerns whereby non-participating customers bear disproportionate infrastructure and reliability costs. Furthermore, the economics of community solar in Puerto Rico remain highly dependent on public subsidies, tax incentives, and favorable compensation structures that may not reflect the actual avoided cost or operational value of exported energy to the system. Additionally, PREPA's aging and unsophisticated CC&B platforms, that LUMA inherited, would require significant IT and manpower investment to operationalize crediting successfully.

In practical terms, Puerto Rico's immediate priority must remain stabilizing and hardening the core T&D network, accelerating already-funded reconstruction projects, and ensuring equitable cost recovery before layering on administratively complex community solar structures that the current grid architecture and regulatory framework are not yet fully equipped to support[1]. Lastly, various existing rulemaking dockets are currently open that currently impede the successful development of community solar (CS).

PREB has initiated proceedings in the matter of *In Re: Community Solar Regulatory Framework*, Case No. NEPR-MI-2025-0003, to gather information and facilitate discussions aimed at developing an outline of proposed regulations to support a future rulemaking process. As part of these proceedings, in April 2026, PREB issued guidance questions and invited stakeholders to submit responses and feedback, while also welcoming the submission of additional information and requests for clarification, as needed.

[1] Refer to Draft Study regarding Net Metering and Distributed Generation filed on June 14, 2024, by the Puerto Rico Energy Bureau under Case Num. NEPR-MI-2024-0006.

Response to Community Solar Regulations

Pursuant to that directive, LUMA submits the following comments and analysis and looks forward to further discussing these matters in the upcoming workshops and proceedings. The responses provided below are subject to amendment and modification based on additional technical and economic analysis.

1.0 Legal and Regulatory Context

Act 57-2014, as amended, directs PREB, in coordination with the Energy Public Policy Program and Independent Consumer Protection Office ("OIPC"), to establish a regulatory framework for community-solar projects and microgrids. PREB commenced docket number NEPR-MI-2025-0003 to support a pilot and subsequent formal rulemaking and later re-commenced the proceeding after the EPA grant cancellation that had initially framed the pilot.

PREB identified the core design questions such as ownership, governance, geographic scope, physical configuration, interconnection requirements, valuation and pricing, reporting, consumer protection, equity, and project capacity limits. The matters addressed below. LUMA has indicated that it intends to participate in the community-solar process and that the community-solar framework overlaps with the active interconnection regulations docket, NEPR-MI-2019-0009, which focuses on distributed generation.[2]

In that interconnection docket, LUMA recommends a unified DER-inclusive interconnection framework built on Regulations 8915, 8916, and 9028, recognized utility practices, Federal Eenergy Regulatory Commission (FERC) SGIP/SGIA models, and Department of Energy (DOE) DER interconnection guidance. That position should carry through to community solar because community solar will interconnect export-capable DERs on the same constrained transmission and distribution system.

Any community-solar framework must be consistent with the Puerto Rico rate framework and the condition of the T&D system. In the rate case record, PREB acknowledged poor conditions throughout generation, transmission, distribution, substations, and financial recordkeeping.

2.0 Summary of Recommended Regulatory Design

Issue	Recommended Position	Utility Rationale
Business model	Competitive selection of a third-party owned, tariff-administered community solar, with limited municipal/nonprofit projects allowed under the same rules. Developers shall pay the required interconnection and associated costs.	Uses private capital, keeps development risk off ratepayers, and preserves LUMA as a neutral T&D operator.
Governance	PREB-approved tariff; LUMA interconnection/potential crediting role; OIPC consumer-protection	Separates market development from monopoly

[2] https://energia.pr.gov/wp-content/uploads/sites/7/2026/05/20260527-MI20190009-Motion-to-Submit-LUMAs-Presentation-for-Virtual-Stakeholder-Workshop-Schedule-for-May-28-2026.pdf

Response to Community Solar Regulations

Issue	Recommended Position	Utility Rationale
	role; PREB registered "ESC". LUMA should have ability to freeze development of CS if non-complaint.	grid functions and protects customers.
Boundaries	Island-wide subscription/crediting within LUMA service territory; electrical boundaries for interconnection based on feeder/substation hosting capacity.	Avoids political subdivision constraints while respecting physical grid limits.
Physical configuration	Aligned with interconnection regulations. Distribution-connected solar with smart inverter settings activated; storage not universally mandatory but required where needed by study, program block, or resiliency claim.	Supports reliability without imposing one-size-fits-all cost.
Valuation	To be determined.	Important factors to consider include limiting cross-subsidies, double-dip, and aligning with current credit model.
Consumer protection	Plain-language disclosures, Act 57 complaint process, data privacy, and monthly reporting.	Necessary because subscribers may not understand interconnection process, and developers are not the utility.
Equity	Minimum LMI/disadvantaged participation.	Targeted benefits to customers unable to install rooftop solar.
Capacity limits	Pilot cap plus individual project thresholds, pre-injection screening; and performance.	Prevents safety and reliability concerns from DER integration on a fragile grid.

1. Business model that best enhances affordability, equity and reliability

The recommended business model is a PREB-regulated, third party-owned community solar model, implemented through a to be determined tariff/credit model and standard interconnection agreements: all costs for interconnection should be covered by the developers. In this structure, private developers finance, own, construct, operate, maintain, and insure the community solar facility. LUMA remains with the T&D operation and interconnection/credit administrator, and PREB sets the tariff, crediting rules, reporting requirements, and consumer-protection rules.

Response to Community Solar Regulations

This model best fits Puerto Rico because it mobilizes private capital at a time when the utility system faces major T&D capital needs and funding uncertainty. It also avoids making all ratepayers underwrite community-solar development risk, while allowing PREB to impose affordability and equity conditions as prerequisites to program participation.

Examples include Minnesota/Xcel Energy, where private developers own projects and sell subscriptions, while subscribers receive bill credits on Xcel bills. The New York Community Distributed Generation model cited by other stakeholders in this docket is not recommended and applicable to Puerto Rico.

1a. Structure of the model

A community solar project could be, for example, held by a special-purpose entity that is financially and operationally responsible for the facility. The project owner signs an interconnection agreement with LUMA, posts required security, pays application/study/upgrade costs assigned under the cost-causer principle, and complies with telemetry, metering, inverter, protection, and operational requirements. Subscribers sign separate subscription agreements with the project owner, not with LUMA.

The project owner should be required to maintain a subscriber organization, provide monthly allocation files to LUMA, maintain customer consents and data privacy, and submit periodic reports to PREB and OIPC. LUMA should not be required to evaluate private subscription economics or guarantee developer performance but should validate account eligibility and apply credits under PREB-approved rules/model.

1b. Examples

Minnesota is the clearest example of a private developer model. State materials explain that private solar developers own projects and sell subscriptions, with subscribers receiving bill credits on their Xcel Energy bills.[3]

2. Appropriate governance structure

Governance should be centralized in PREB through a community-solar regulation but operationally distributed among the entities with statutory or operational competence. PREB should approve program rules, tariffs/credits, eligibility, valuation, project caps, reporting templates, consumer protection standards, and enforcement mechanisms. LUMA should administer interconnection, metering, credit allocation, outage coordination, and operational dispatch/curtailment instructions. The Energy Public Policy Program should coordinate policy objectives. OIPC should receive consumer reports, participate in complaint procedures, and advise on consumer protection rules.

The governance structure should prohibit a community-solar entity from acting like an unregulated electric utility, meaning they should register as an “Electric Power Service Company” or “Electric Power Company.” This requirement is consistent with the definition provided in Section 1.2(c) of Act 17-2017. The project owner sells subscriptions and receives tariffed compensation; it does not control the distribution system, serves as the utility of last resort, or bypass LUMA’s duty to operate the grid safely and reliably.

[3]Xcel Energy, Solar*Rewards Community FAQ. https://www.xcelenergy.com/staticfiles/xe-responsive/Admin/Managed%20Documents%20%26%20PDFs/MN-SRC-FAQ-info-sheet.pdf .

2a. Governance examples and documentation

Minnesota provides a useful model: legislation and state program rules establish eligibility, consumer protections, and crediting; Xcel administers bill credits; independent developers manage subscriptions. Xcel's Solar*Rewards Community materials explain that subscribers receive credits based on their share of energy production, posted to utility accounts on a monthly schedule.

Governance should also take into consideration fines and penalties for non-compliance of regulations set forth in this regulation, and other existing regulations.

3. Role of Puerto Rico public entities

PREB should be the primary regulator. It should approve the community-solar regulation and tariff, resolve disputed interconnection, set reporting obligations, and enforce penalties for non-compliance. PREB should also establish a working group for pilot implementation and a formal process for converting pilot results into permanent rules. PREB should assist in defining the legal question on third-party usage of PREPA T&D assets.

OIPC should protect subscribers by receiving escalation complaints. LUMA should retain T&D operational authority and any other authority as subscribed in the T&D OMA.[4]

4. Appropriate geographic or administrative boundaries

The preferred boundary is island-wide subscription eligibility within LUMA's service territory, with electrical restrictions applied at the point of interconnection per established technical requirements.

This approach recognizes that Puerto Rico is an integrated island grid, not a set of municipal utilities. Political boundaries do not determine feeder capacity, reverse power flow, voltage constraints, or substation transformer loading. Community benefit can be achieved by subscribers for eligibility and set asides without pretending that municipal lines are electrical boundaries.

4a. How boundaries are established in the recommended model

Program boundaries should be established in the tariff: eligible subscribers must be LUMA retail customers in good standing; the project must interconnect at an approved point on the LUMA T&D system; credit allocation is virtual through the billing system; and PREB may set minimum local or disadvantaged-community subscriber percentages for specific program blocks. Also consider excluding existing net energy metering customers and customers with past due balances.

Boundaries, if at all set, should be determined through the interconnection process, including feeder-level screens, hosting-capacity data when available, studies, protection review, and any required system upgrades.

[4] LUMA Energy, LLC, LUMA Energy ServCo, LLC, the Puerto Rico Electric Power Authority and the Puerto Rico Public Private Partnerships Authority, Transmission and Distribution System Operation and Management Agreement (June 22, 2020); Puerto Rico Transmission and Distribution System Operation and Maintenance Supplemental Terms Agreement (June 22, 2020)(together herein referred to as the "T&D OMA") https://docs.pr.gov/files/P3-PublicaPrivadas/Projects/Projects/TD%20-%20LUMA/OM%20Agreement/executed-consolidated-om-agreement-td.pdf

4b. Alternatives and preferred alternative

Alternatives include: (i) municipal-only boundaries; (ii) distribution-feeder or substation-area boundaries; (iii) island-wide LUMA service territory boundaries; and (iv) hybrid boundaries that allow island-wide subscriptions but reserve some credits for customers near the project or in disadvantaged communities. The preferred alternative is the hybrid island-wide/electrical model.

Municipal-only boundaries are administratively simple but inefficient and may strand projects in municipalities with limited hosting capacity or insufficient eligible load. Feeder-only boundaries are electrically meaningful but may be too narrow for equitable subscription and financing. Island-wide crediting maximizes customer access and subscription liquidity, but it must be paired with interconnection discipline to prevent local grid harm. The hybrid model best balances financeability, equity, and reliability.

4c. Whether community solar should be confined to a political subdivision

No. Community solar should not be confined to a political subdivision as a general rule. PREB may authorize municipal-hosted or municipality-sponsored projects, but municipal lines should not define the market unless a specific program block is designed for a local resilience or low-income objective. The distribution system's physical constraints, not political borders, determine whether a project can be safely interconnected. PREB shall also verify that municipalities have the financial capability to execute a community solar project.

5. Physical configurations for community solar

Acceptable configurations should include: (i) front-of-the-meter distribution-connected solar PV; (ii) solar-plus-storage; (iii) rooftop, canopy, brownfield, landfill, parking-lot, or ground-mounted projects; and (iv) non-export or limited-export systems where appropriate; Projects should be separately metered at the point of interconnection and capable of remote monitoring and curtailment when operationally necessary.

Puerto Rico should prefer sites that reduce land-use conflicts, support distribution benefits, and can be interconnected without disproportionate upgrades. Project selection should reward storage, controllability, and locations with high locational grid value, but should not make every project a reliability resource unless it is technically designed, contracted, and compensated as such.

5a. Ride-through inverter requirement

Yes. LUMA presented its requests on Smart Inverter Settings on June 20th, 2025 and has reiterated its position under docket NEPR-MI-2019-0009. Ride-through capable smart inverters should be required for all export-capable community solar projects, with settings approved through the interconnection framework. NREL explains that IEEE 1547-2018 mandates both tripping and ride-through requirements, and that ride-through is a DER capability, not merely a setting. High penetration of inverter-based resources on Puerto Rico's constrained grid makes coordinated voltage/frequency ride-through essential to avoid mass tripping during disturbances.

LUMA's interconnection comments emphasize smart inverters, feeder-level interconnection limits, and the operational risks created by high volumes of DER on aging assets and limited redundancy. Community solar should therefore comply with IEEE 1547-2018/1547.1, UL 1741 SB or successor certifications, LUMA/PREB-approved settings, anti-islanding, voltage regulation, frequency-watt, volt-var/volt-watt, telemetry, and commissioning tests.

5b. Storage requirement

Storage should be determined by whether or not it fits the developer's economics, so should not be universally required at the outset. Having storage can provide benefits to the grid (i.e. intermittency) or reduce impacts on the grid stemming from additional DER interconnection.

6. Interconnection requirements for community solar

Community solar should follow the active PREB interconnection framework for DERs, with a dedicated community-solar track. Required elements should include application completeness, site control, one-line diagrams, equipment certifications, protection schemes, export capacity, point-of-interconnection identification, utility study, upgrade identification, cost responsibility, interconnection agreement, commissioning, witness testing as needed, telemetry, meter installation, and ongoing operating obligations.

The framework should use FERC SGIP/SGIA concepts as a model while adapting them to Puerto Rico distribution conditions, including feeder constraints, high DER penetration, aging assets, limited redundancy, and island grid reliability needs. LUMA should be allowed to require additional studies where screens show potential adverse impacts, but the process should be transparent, standardized, and subject to PREB oversight.

All costs associated with interconnection shall be covered by the developers.

7. Interconnection requirements for the recommended business model

The interconnection customer should be the project owner or project special-purpose entity. The interconnection counterparty should be LUMA, as operator of the T&D system, acting within PREB-approved regulations and agreements. The project connects to the LUMA distribution system unless it is large enough or configured to require sub-transmission/transmission interconnection, in which case Regulation 8916 or successor rules should apply.

The project owner should pay for customer-side equipment and interconnection studies and should fund required upgrades under a cost-causer principle. As T&D Operator LUMA should operate in front of the meter facilities unless otherwise defined and approved, and should recover prudently incurred administrative, metering, IT, and system costs through approved mechanisms.

8. Role of NEM in valuing community solar power

Traditional retail net energy meterin (NEM) should not be the default valuation method for community solar exports. NEM is a customer-sited self-supply mechanism: a customer offsets on-site consumption with on-site generation and receives treatment for net exports. Community solar is different: it is off-site generation allocated through virtual credits. Using full retail NEM for community solar would risk over-crediting exports for costs that the project does not avoid, including T&D, public-policy charges, stranded generation costs, and fixed system costs.

NEM can inform transition design and customer-facing simplicity, but the community-solar credit should be based on avoided cost or a Puerto Rico value-stack methodology. PREB’s own net-metering study context recognizes the need for better information on costs and benefits as renewable penetration increases and asks whether other pricing/incentive mechanisms can do better than current NEM.

Response to Community Solar Regulations

8a. Participation by customers with NEM solar

Customers with NEM-compensated rooftop solar may participate only if safeguards prevent double counting and cost shifting. Their community-solar subscription should be sized to net consumption after their own NEM generation, not gross consumption. Lastly, if NEM customers are included, it could complicate CC&B crediting process.

For customers without rooftop solar, community solar provides access to renewable bill credits without on-site installation. For customers with NEM, community solar is supplemental and should not create a second retail-rate export subsidy on top of existing NEM benefits.

The implementation of these suggestions *may* require revisions to applicable laws, including Act 114-2007.

9. Entity purchasing excess electricity

The entity financially responsible for purchasing or crediting excess electricity should be defined by tariff. In the recommended model, the energy is injected into the LUMA/PREPA system and credited under a PREB-approved tariff. Because LUMA is the T&D operator and does not control generation fuel costs or profit from fuel-cost changes, the economic buyer/settlement entity should be PREPA or the system supply function, with LUMA administering metering and CS credits as agent under PREB-approved rules.

To avoid ambiguity, PREB should designate a buyer-of-record or settlement administrator and specify whether energy credits reduce fuel/purchased-power costs, are settled through power purchase charge adjustment (PPCA) and the fuel charge adustment(FCA)-type mechanisms, or are handled under a separate community-solar rider.

10. Options for pricing power injected into the grid

Options include: (i) avoided energy cost; (ii) avoided energy plus capacity; (iii) value stack reflecting energy, capacity, environmental, distribution, resilience, and locational values; (iv) competitively procured fixed price; (v) administratively set bill-credit rate; (vi) wholesale marginal-cost proxy; and (vii) time-varying prices. As has been demonstrated the NY value-stack pricing model has proven overly complex and should be avoided.

Retail-rate crediting should be avoided unless PREB makes a specific finding that the credit does not create unreasonable cost shifts and is justified by measurable system benefits or limited pilot objectives. [8]

10a.Pricing information available

Available inputs include fuel and purchased-power adjustment filings, avoided generation cost information, resource planning data, rate case evidence, PREPA/Genera generation costs, FCA/PPCA reconciliations, interconnection and hosting-capacity data, and locational reliability information from LUMA.

However, **Puerto Rico's current data is not yet sufficient for a fully dynamic locational marginal distribution price**. PREB should therefore require LUMA and relevant generation entities to produce a data roadmap before adopting real-time community-solar pricing.

10b. Sufficiency of avoided-cost estimates

Current avoided-cost estimates are useful for a pilot but insufficient for a permanent community-solar program. PREB's net-metering report recognizes that more information is needed to fully characterize costs and benefits. Avoided-cost values should be updated regularly and should separately identify avoided energy, capacity, environmental compliance, line losses, distribution deferral, integration costs, administrative costs, and any costs shifted to non-participants.

10c. LUMA real-time value information

LUMA can provide operational information relevant to real-time or locational value, including feeder loading, hosting capacity, voltage constraints, outage/reliability data, equipment conditions, DER penetration, curtailment events, and interconnection-study results. LUMA's current public filings emphasize the need for feeder-specific hosting capacity integration, smart inverter settings, and standardized DER interconnection processes.

LUMA should not be expected to establish market prices unilaterally. PREB should establish the methodology, and LUMA should provide technical data and implement approved calculations through billing/settlement systems.

11. Pricing, crediting, and accounting for delivered power

Community solar does not physically deliver specific electrons to individual members. Power is injected at the project point of interconnection and consumed by the grid according to system physics. Members receive a subscription bill from the Community Solar owner. Members receive a utility bill credit for their allocated share of metered production (either on their utility bill or their subscriber bill/account). LUMA should meter the project output, apply approved loss factors if applicable, receive a subscriber allocation file, and apply credits to eligible customer accounts (unless done so by CS owner).

Accounting should distinguish: project metered kWh; export kWh; subscriber allocations; credit rate; customer bill charges offset; unallocated energy; administrative fees; and any cost-recovery mechanism. This separation is essential for auditability and protection of non-participants.

Any pricing model shall take into consideration the liquidity constraints facing the electrical system.

12. Basis for crediting electricity to ultimate buyer/members

The basis should be a PREB-approved tariff credit. PREB shall take into consideration existing NEM structure, existing financial constraints, and other factors.

13.Tariff, contract, or other vehicle for credits

PREB shall set tariffs and credits based on existing models. Contracts should include target costs allocation to developers in line with existing practice, interconnection agreement, subscriber disclosure form, data-sharing authorization, reporting template, consumer complaint process, and default/cure procedures.

Response to Community Solar Regulations

14. Fixed subscription amounts; excess energy and unused credits

Participants should subscribe to a threshold model. For example, 100-120% of the most recent 12-month period consumption. This is fundamental to ensure CS subscription does not exceed monthly/annual consumption resulting in credits that would require cashing out, carrying over credits and administrative burdens. If the following is allowed, it would continue to financially stress the electrical system.

15.Opt-in or opt-out participation

Participation should be opt-in. Opt-in participation protects LUMA and PREB from disputes over unauthorized enrollment, mistaken crediting, and unclear contractual obligations.

16. Reporting requirements

Project owners should report monthly and annually on project generation, subscriber allocations, subscriber class, LMI/disadvantaged participation, subscription pricing, customer savings, complaints, cancellation from the subscription, credit reversals, data errors, outages, curtailments, storage dispatch if applicable, unallocated energy, and compliance with consumer-protection requirements.

LUMA should report interconnection queues, study timelines, approved projects, rejected/withdrawn projects, upgrades, hosting-capacity constraints, crediting errors, administrative costs, and operational issues. Reporting cadence should balance oversight with administrative burden; monthly operational dashboards during a pilot and quarterly narrative reports are preferable to duplicative monthly legal filings.

17. Entity receiving reports

PREB should receive all regulatory reports. OIPC should receive consumer-protection and complaint escalations. LUMA should receive operational, subscriber-allocation, and interconnection data needed to administer the tariff. Public versions should be posted with confidential customer and critical energy infrastructure information redacted.

18. Role of consumer protection

Community solar creates a triangular relationship among subscribers, developers, and utility. Customers may believe they are buying electricity from LUMA when they are buying a subscription from a third-party entity. Rules should require clear disclosures, no unfair exit fees, portability, cancellation rights, data privacy, standardized marketing claims, complaint escalation, and penalties for deceptive conduct.

19. Entity with authority to provide protection

PREB has authority over electric service companies, tariffs, program rules and regulations, and enforcement in this docket. OIPC is the specialized consumer advocate within the Public Service Regulatory Board structure and should have a formal role in tending formal complaints.

20. Governmental entity with consumer protection authority

If PREB determines existing PREB and OIPC authority is insufficient for third-party subscriber contracts, PREB should condition project eligibility on voluntary submission to PREB jurisdiction, tariff terms,

bonding/registration, and standardized contracts. If legislative clarification is needed, the appropriate governmental entities are the Legislative Assembly and the Governor, with implementation by PREB and OIPC. Until then, PREB should require any developer seeking bill-credit access to agree to PREB enforcement as a condition of program participation.

21. Distributional equity and 22. Low-income/disadvantage set-asides

In addressing these questions, PREB should consider how to address the following:

1. Public housing customers who are in a fixed rate,

2. What qualification mechanisms will be used to determine set-asides, and

3. Will public entities qualify in bulk or case-by-case.

23. Capacity Limits

Yes. Capacity limits are essential for a pilot and for reliability. PREB's 2025 order contemplated a pilot framework, and SESA referenced an initial pilot of up to 25 MW aggregate with individual projects up to 5 MW. From a utility perspective, those limits are a reasonable starting point, but should be revisited after LUMA provides hosting-capacity, interconnection-queue, billing-system, and operational data.

Individual project caps should depend on voltage level, feeder/substation capability, export profile, storage/control features, and upgrade requirements. Aggregate program caps should be tied to rate impact, interconnection performance, locational diversity, reliability metrics, and administrative readiness. PREB should establish and revise the caps in line with RPS and IRP goals/frameworks.

3.0 Proposed Regulatory Findings / Ordering Principles

1. Community solar shall be developed under a PREB-approved tariff and/or credits model and shall not create any right to interconnect absent satisfaction of applicable interconnection requirements and payments.
2. LUMA shall administer interconnection, metering, operational coordination, and credit allocation as T&D operator, but shall not be deemed the owner, developer, marketer, or guarantor of a community-solar project.
3. Project owners/developers shall bear project development, subscription, performance, equipment, marketing, customer service, subscription billing, dispute or complaint resolution, and interconnection-cost responsibility, subject to PREB-approved cost allocation and dispute resolution.
4. PREB shall adopt consumer-protection standards before customer enrollment, including standardized disclosures, complaint procedures, privacy protections, marketing restrictions, and LMI participation
5. PREB shall establish pilot-level projects and thresholds and shall expand the program only after review of interconnection performance, bill-credit accuracy, consumer feedback, non-participant impacts, and reliability effects.