

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

IN RE: ENERGY EFFICIENCY AND DEMAND
RESPONSE THREE YEAR PLAN

CASE NO: NEPR-MI-2026-0002

SUBJECT: 2026-2028 EE and DR Three Year
Plan Requirements of Information.

RESOLUTION AND ORDER

On March 2, 2026, LUMA¹ filed a *Motion to Submit the Three-Year EE and DR Plan* ("March 2 Motion"), in which LUMA submitted its Three-Year Plan for Energy Efficiency and Demand Response ("TYP") covering the two-year period from July 1, 2026, through June 30, 2028.

On March 4, 2026, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order initiating the current proceeding for the review of the 2026-2028 TYP and establishing a procedural calendar. The Energy Bureau scheduled a technical workshop and established deadlines for stakeholders to submit comments and reply comments.

On March 17, 2027, the Energy Bureau held a virtual technical workshop. LUMA gave a presentation on its TYP and answered questions from the Energy Bureau and stakeholders.²

On April 8, 2026, Sunstrong Management LLC ("Sunstrong") submitted a motion titled *Sunstrong's Comments Regarding CBES Program Administration and Recommended Safeguards for the 2026-2028 EE and DR Plan*. SunStrong raises concerns about potential transparency issues in the current CBES program design, based on events from August 2025. SunStrong explains that its contract with LUMA includes a price ceiling and in August 2025, SunStrong unknowingly reached its contracted price ceiling. SunStrong states that after LUMA had validated the CBES events from August 2025, LUMA informed SunStrong that it had reached the price ceiling and would not be paid a portion of associated compensation. SunStrong recommends additional tracking and safeguard measures be installed in the TYP to avoid similar situations in the future.

On May 29, 2026, the Energy Bureau issued a Resolution and Order in which it temporarily approved the implementation of LUMA's TYP and directed LUMA to implement its programs as stated in the TYP, focusing on maintaining program continuity and ensuring a smooth transition into FY27 while the Energy Bureau completes its review and issuance of a final order for the approval of the TYP. The Energy Bureau directed LUMA to fund the programs using the EE rider at the currently established rate.

To facilitate its review of the TYP, the Energy Bureau requires both LUMA and SunStrong to submit additional information. The Energy Bureau **ORDERS** LUMA and SunStrong to respond to the Requirements of Information (ROIs) in Attachment A of this Resolution and Order **within fourteen (14) calendar days** of its notification.



¹ LUMA Energy LLC and LUMA Energy ServCo LLC (jointly referred as, "LUMA").

² On March 16, 2026, LUMA submitted via motion its presentation for the March 17, 2026 technical workshop.

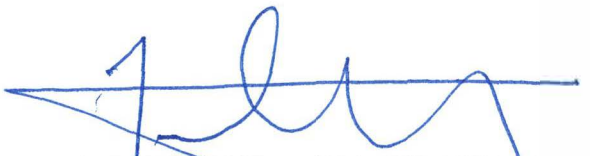
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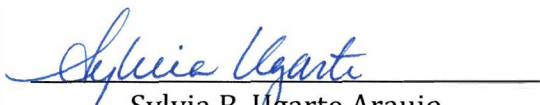
Edison Avilés Deliz
Chairman



Lillian Mateo Santos
Associate Commissioner



Ferdinand A. Ramos Soegaard
Associate Commissioner



Sylvia B. Ugarte Araujo
Associate Commissioner



Antonio Torres Miranda
Associate Commissioner

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on August 10, 2026. I also certify that on August 10 2026, I have proceeded with the filing of the Resolution and Order and a copy of this Resolution and Order was notified by electronic mail to

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jpouroman@outlook.com;	info@sesapr.org;	cfl@mcvpr.com;	mqs@mcvpr.com;
apc@mcvpr.com.			

For the record, I sign this in San Juan, Puerto Rico, today August 10, 2026.



Sonia Seda Gaztambide
Clerk



Attachment A. Requirements of Information

Questions to SunStrong

1. What portion of compensation did LUMA not pay SunStrong for events in August 2025? As part of the response, provide:
 - a. The amount of kWh SunStrong provided for August 2025 events.
 - b. The dollar amount SunStrong expected from LUMA for August 2025 performance.
 - c. The dollar amount SunStrong received from LUMA for August 2025 performance.
2. Have SunStrong and LUMA resolved this matter from August 2025? If so, please summarize the outcome. If not, please provide a status update on discussions and expected next steps.
3. How did SunStrong address the unpaid compensation from August 2025? Did SunStrong adjust the incentives it paid to participating customers, or had SunStrong already paid customers for their participation before LUMA notified SunStrong it would not be compensated?
4. Has SunStrong run into any similar situations where the contracted price ceiling was an issue with LUMA and CBES payments outside of August 2025?
5. How does the new \$9 million contracted price ceiling impact SunStrong's concerns with LUMA's implementation of the CBES program?
6. Can SunStrong estimate its progress towards the contracted price ceiling? If not, what information does SunStrong not currently have access to that would allow it to track its progress?

Questions to LUMA

1. Please explain the purpose of the contracted pricing ceiling within LUMA's CBES contracts with aggregators.
2. Please explain how LUMA determines the contractual price ceiling dollar amount. As part of the response, explain whether the ceiling varies by aggregator.
3. Have SunStrong and LUMA resolved this matter from August 2025? If so, please summarize the outcome. If not, please provide a status update on discussions and expected next steps.
4. Other than SunStrong, has LUMA determined that CBES compensation would not be paid to any other aggregators after CBES events were called? If so, identify all instances when LUMA has not paid aggregators following a CBES event.
5. For each instance in which LUMA determined that CBES compensation would not be paid to an aggregator after CBES events were called, provide the following information.
 - a. The number of aggregators that were not paid.
 - b. The reason aggregators were not paid.
 - c. The contracted price ceiling for each impacted aggregator.
 - d. The amount of compensation that LUMA did not pay each impacted aggregator (i.e., the amount over the price ceiling).
 - e. The number of MW and MWh provided through CBES that were not paid by LUMA.
6. Could LUMA provide vendors with progress towards the contracted price ceiling?



- a. If not, why not?
 - b. If so, would LUMA incur additional costs to provide that data? If so, what is LUMA's estimated cost range for such data access and sharing?
7. If LUMA could provide vendors with progress towards the contracted price ceiling, how soon after a CBES event could LUMA provide that information? Could LUMA provide aggregators with an update within 5 hours, 24 hours, 3 days, etc.?
8. Please explain how LUMA validates each aggregator's CBES performance. As part of the response, indicate whether the estimated kWh delivered typically varies after LUMA's validation process and, if so, by how much and why.
9. Please explain whether LUMA has concerns with SunStrong's recommendations or if LUMA would support the recommended measures.
10. Did LUMA include the total MWh provided by SunStrong customers and the associated total event cost in its August 2025 CBES report and its Q1 FY2026 Consolidated Transition Period Plan and Demand Response Administrative Costs Quarterly Report?

