

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

NEPR

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**IN RE: INTERCONNECTION
REGULATIONS**

CASE NO.: NEPR-MI-2019-0009 /
NEPR-MI-2018-0008

SUBJECT: Comments on Distributed
Generation and Microgrid
Interconnection Regulation – Case No.
NEPR-MI-2019-0009

**JOINT MOTION SUBMITTING COMMENTS TO REVISED PRELIMINARY
DRAFT INTERCONNECTION REGULATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW the SOLAR AND ENERGY STORAGE ASSOCIATION OF PUERTO RICO (“SESA”) and SOLAR UNITED NEIGHBORS (“SUN”) (jointly, the “Movants”), through undersigned counsel, and respectfully state and request as follows:

1. SESA is a nonprofit trade association representing Puerto Rico’s solar and energy storage industries, from manufacturing, finance, installation, as well as service and support. SUN is a nonprofit organization dedicated to a clean, equitable, resilient energy system and represents net-metering customers, prospective rooftop solar adopters, and low-net-consumption residential customers.
2. The Resolution and Order entered and notified on July 13, 2026 (the “July 13 Order”) addresses both the ongoing proceeding for adoption of the interconnection regulation and the Technical Interconnection Requirements (“TIR”), and specifically directs stakeholders to submit the next round of written comments and feedback on the Revised Preliminary Draft Interconnection Regulation on or before August 14, 2026.
3. In accordance with the July 13 Order, Movants respectfully submit herein, as Appendix A and B, our response comments to the July 13 Revised Preliminary Draft of the Distributed Generation and Microgrid Interconnection Regulation. As explained in Appendix A, these comments do not in any way constitute an exhaustive analyses of the July 13 draft, but rather focus on aspects of the draft rule which are required by law to be included in this rulemaking, yet are either partially or entirely absent from the published draft. We look forward to participation in future workshops, the publishing of a complete draft rule for stakeholder comment, and the contracting of the required entity with deep expertise in interconnection rule rulemaking a subsequent steps in this important process.

WHEREFORE, the Movants respectfully request that the Energy Bureau receive and consider our comments

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of August, 2026.

s/Javier Rúa-Jovet

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CERTIFICATE OF SERVICE: I hereby certify that a copy of this Joint Motion was filed with the Energy Bureau through its electronic filing system at <https://radicacion.energia.pr.gov/> and by electronic mail.

APPENDIX A

APPENDIX A

SESA AND SUN COMMENTS TO REVISED PRELIMINARY DRAFT OF THE DISTRIBUTED GENERATION AND MICROGRID INTERCONNECTION REGULATION, CASE NO. NEPR-MI-2019-0009

To the Hon. Edison Avilés Deliz, Chairman of the Puerto Rico Energy Bureau:

SESA and SUN acknowledge and applaud the progress being made toward the development of Puerto Rico's new interconnection regulation. At the same time, we must recognize that the draft published on July 13 (the “Draft Rule”) does not yet constitute a complete first draft of the regulation, because it omits several components that are required by law and that are necessary for meaningful stakeholder evaluation.

We also note that Joint Resolution 5-2026 requires the participatory workshops in this proceeding to be “*guiados por una firma o entidad reconocida por su alto expertise y substantial experiencia previa probada en moderación de procesos intensivos y multi-participativos de reglamentación de interconexión*” — guided by a firm or entity recognized for its high expertise and substantial, proven prior experience moderating intensive, multi-participant interconnection rulemakings. To date, the entity we understand is intended to provide that expertise has not yet been contracted, and it has therefore not been available to stakeholders for technical consultation or questions.

Accordingly, these comments do not yet include a comprehensive redline of proposed revisions. Instead, they identify the key components missing from the July 13 draft and provide suggested content — drawn from Puerto Rico's own statutes and operating history, and from best practices in leading U.S. jurisdictions — for the Energy Bureau's consideration as it prepares a complete first draft for stakeholder review. The principal missing components are listed here, and detailed in the remainder of this document:

- Item I: Recognition and implementation of the statutory requirement of automatic interconnection and automatic net metering within thirty (30) days for systems of 25 kW or less, upon certification by an independent licensed electrician or professional engineer.
- Item II: Implementation of the statutory requirement that systems above 25 kW be evaluated within a strict maximum period of ninety (90) days, with automatic approval as the statutory consequence of noncompliance.
- Item III: Proactive hosting capacity planning and budgeting.
- Item IV: A methodology for determining and allocating the costs of network studies and of any required system upgrades.
- Item V: The customer curtailment-compensation mechanism the Joint Resolution requires.
- Item VI: Provisions governing meter socket adapters (full proposed rule text at Appendix B).

Items 3 through 6 are named expressly in Joint Resolution 5-2026, Section 2, which directs that the new regulation “*adoptará tecnologías y conceptos modernos de interconexión*” — shall adopt modern interconnection technologies and concepts — and then lists them: proactive hosting capacity planning and budgeting, meter socket adapters, daytime minimum load, compensation

for customers' economic losses from export restrictions (curtailment), and the transmission and distribution operator's costs for network studies, “*entre otros*.” The enumeration is a floor, not a ceiling.

Of the concepts the Joint Resolution names, only daytime minimum load appears in the July 13 draft at all, and it does so incompletely: the draft appears to apply a daytime-minimum-load screen only to solar-only systems, leaving it unclear how solar-plus-storage systems — nearly all of what is deployed today — are to be handled. That screen should extend to solar-plus-storage, and be measured on the solar export capacity alone.

The sections below distill written input received from SESA member companies across every sector of the industry — residential installers, commercial and industrial developers, equipment manufacturers, and financing providers, as well as from SUN. One principle recurs in that input more than any other and unites all six sections: certainty. Customers, and the companies that serve them, must be able to know the terms of an interconnection — its timeline, its costs, and any operating limitations — before a system is sold and installed, and a determination once made must be final. A process that allows material terms to change after approval, installation, or permission to operate cannot be financed, priced, or explained to a customer, whatever its other merits.

These comments are intended to assist the Energy Bureau in incorporating the missing components into a complete first draft of the regulation for stakeholder comment. SESA and SUN also encourage the prompt engagement of an entity with deep technical expertise in interconnection rulemaking, and remains available to assist the Energy Bureau in that effort in whatever ways are most useful.

I. Automatic Interconnection and Automatic Net Metering (Systems of 25 kW or Less)

Act 114-2007, as amended by Act 17-2019, sets out a complete framework for systems of 25 kW or less: such systems “shall be interconnected automatically,” they begin operating once an electrical engineer or expert electrician certifies compliance with the technical requirements, no interconnection application is necessary, and net metering must be reflected on the customer's bill within thirty (30) days. The statutory sequence is certify → connect → notify.

The Draft Rule substantially deviates from this established process, replacing it with one that explicitly requires multiple points of EPS Operator review and approval while also subjecting < 25 kW projects to a problematic supplemental review process. These new proposed procedural requirements are inconsistent with Act 17-2019. The process outlined for a < 25 kW project appears to be the following, though some ambiguity exists throughout the Draft Rule:

1. Customer submits the Interconnection Notification and the Net Metering Notification Fee.
2. The EPS Operator notifies the customer within 5 days that the Notification is complete or incomplete. If incomplete, the customer corrects deficiencies.
3. The EPS Operator completes the eligibility screens from Article 3 within 15 business days of the completion notification.
4. The EPS Operator countersigns the Interconnection Notification and Agreement.
5. The customer installs the system.

6. Completion of the Field Inspection and Testing Process, and certification provided to the EPS Operator (see below).

7. The EPS Operator provides authorization to operate within 3 business days.

Supplemental Review

The process in the Draft Rule indicates that in addition to the process described above, the EPS Operator is, at its discretion, able to conduct a supplemental review. This supplemental review can result in the interconnecting system being required to be subject to operational restrictions and/or system upgrade costs. It is not entirely clear in the Draft Rule whether the supplemental review can be completed by the EPS operator at any point of the envisioned process, including even after a system is already installed and operational, or if it must take place in the 15 business days so as to “not impede the review and approval of the Interconnection Notice.”

The Draft Rule allows the EPS Operator 30 business days to complete the supplemental review and provide results to the interconnecting customer. This clearly does not fit within the 15 business day timeframe required for the Interconnection Notification. Regardless of whether the supplemental review must be completed during prior to countersigning the Interconnection Notification and Agreement or can be initiated at any point, the supplemental review is problematic.

If the supplemental review can be triggered by the EPS Operator at any point in the process, that would represent an unacceptable level of risk for all < 25 kW projects given it could result in significant costs or severe operational restrictions. Imposing those on already contracted, and potentially already installed or operational, projects would be impossible to plan for and manage customer expectations. Receiving a countersigned Interconnection Notification and Agreement that can be modified by the EPS Operator after the fact would make such an agreement useless for the interconnecting customer. If the supplemental review is completed during the EPS Operators review of the Interconnection Notification, this would be a substantial departure from the statutory requirements of Act 17-2019. It is also not clear how under that process the supplemental review would be incorporated in a way to ensure that it does not impede the approval of the Interconnection Notice. Inclusion of the supplemental review in a standard process where the results of the review may prove to be an insurmountable barrier for the interconnecting customer does not allow the interconnection right afforded by statute.

Field Inspection & Testing Process

Section 7.03.D establishes the field inspection and testing checklist for Simplified Process projects in lieu of Sections 7.03.A–C, and the checklist items are generally reasonable, but important clarifications are needed. Items (1), (2), and (5) reference documents that do not exist in the Simplified Process. Item (1) requires verification that the installation matches “the EPS Operator’s evaluation of the design” — but under Act 17-2019’s notification framework, the system may be installed and operating before any submission to the EPS Operator, whose subsequent role is limited to screening the notification; no evaluation of the design exists. Items (2) and (5) reference an “application,” but the Simplified Process uses no Interconnection Application as that term is defined.

Items (1), (2), and (5) should therefore instead reference the design and one-line diagram described in the Simplified Interconnection Notification and Agreement, and not use the phrase "the EPS Operator's evaluation of the design" nor the word "application".

Additionally, Section 7.03.D should be clarified that the enumerated items constitute a self-inspection completed by the Interconnection Customer and certified by the licensed electrician or professional engineer in the notification to the EPS Operator, and that EPS Operator presence or participation is not required and shall not be a precondition to interconnection or Parallel Operation. Solar+storage projects are an important energy resource for Puerto Rico today and will continue to be for years to come. It is critical that the final interconnection rule support further growth. The CBES Program and use of smart inverter settings are just two examples of how these resources can be harnessed to support the grid, and future programs should be able to more fully use these resources in new ways. An interconnection rule that either imposes excessive operational restrictions or upgrade costs to individual < 25 kW projects would freeze the market and harm Puerto Rico's energy future.

The Energy Bureau should not treat either the pre-installation submission or the supplemental review as a settled feature going into the next draft.

In order for the rule to be both compliant with applicable law, and compatible with reality in practical terms, the following aspects of the July 13th Draft Rule which we posit would need to be changed:

1. **Substantial ongoing risk to projects.** In the Draft Rule, the supplemental review has no truly defined trigger, no clear completion clock, and no scope limit, and as drafted, even where it mentions "working day" counts, it may be triggered by the EPS Operator at any point — potentially including after the interconnection agreement is executed, after installation, and after permission to operate — with results that can impose upgrade costs or export restrictions on a system already sold, financed, and operating. The draft even provides for reopening an executed agreement to require modifications or export limits.
2. **Requires decisions without necessary information.** The Draft Rule states that after a supplemental review has been completed, the customer must elect whether to continue with their project before receiving a cost estimate. — and the estimate that is then provided is non-binding. No household can make that decision, and financing parties can't underwrite that sort of uncertainty.
3. **Doesn't have any limit to operational restrictions.** Nothing in the Draft Rule limits the restrictions a review may impose. A zero-export or deep-limitation outcome would strip precisely the storage functions — participation in battery emergency programs and other grid services — that make these systems most valuable to the grid. Restrictions, wherever justified at all, must be narrow, tailored, and compensated
4. **The two mechanisms contradict each other.** The Draft Rule states that the review "cannot impede" the fifteen-Business-Day approval of the interconnection notification, yet it also states that its results can undo that approval afterward. An approval that can be reopened at will does not constitute an approval. The notification settles neither timeline, nor cost, nor operating terms. It is also unclear whether a supplemental review is triggered

by an individual system's impact or if it is completed as an aggregate feeder-level study spanning across many projects. Installers must be able to understand which projects are most at risk of supplemental review so that they can advise customers clearly.

Each of these is an unworkable surprise waiting to happen. Residential and small commercial solar-plus-storage is sold at a fixed price, on a committed timeline, with the product's functions described in the contract. A process under which the price, the timeline, or the functions can change after signature — or after commissioning — is simply unworkable.

Recommended Solutions

SESA and SUN accordingly recommend that the regulation implement the statutory framework as a registration process rather than a permission asking process, for systems under 25kW in size. The changes below would resolve each of the defects above while preserving needed legitimate utility functions:

1. **Registration as authorization.** A complete electronic filing, certified by the licensed professional, is itself the authorization to operate. The utility receives five (5) Business Days to review completeness — limited to material deficiencies, identified in one consolidated notice — and silence deems the filing complete.
2. **No preconditions to operation.** No countersignature, screening result, study, witnessed inspection, meter work, or queue position should delay or condition operation. Installation and certification documentation should be submitted electronically; and any administrative screens should be only for data collection and utility planning purposes.
3. **Post-registration utility oversight preserved.** The utility keeps the ability to perform field verification if they choose (at no additional cost to the customer), and can issue correction notices with defined cure periods, only if material installation defects are identified and documented.
4. **Automatic net metering.** Net metering must appear on the bill no later than thirty (30) days after the certification notice, and credits should accrue from day 30 even where the utility's meter exchange or billing update is still pending. Internal process delays on the part of the utility should not cost the customer the credit the statute grants. If utility process delays do cause economic harm to the customer, then credits owed to the customer should be required to be automatically applied to their bills.
5. **Export-based eligibility and consistent units.** Eligibility and any limits should be expressed as maximum export at the point of interconnection, in kW (AC) of real power, consistent with the statute and with revenue metering; for solar-plus-storage systems, eligibility should be measured by export capacity of the inverter, not the nameplate of the array and / or the storage.
6. **Equipment acceptance.** Equipment on the California Energy Commission (CEC) lists should be accepted automatically upon listing by the CEC, with the utility's portal updated on a short, defined cadence, and a transparent secondary process — with published criteria, a short decision clock, and an appeal process — for equipment not on those lists.

7. **Finality.** Once a system is registered — and, for larger systems, once an agreement is executed or permission to operate is granted — the utility should not be allowed to impose retroactive fees, export restrictions, or modification requirements, and should not reopen the authorization, except through a due-process mechanism with written findings and a transparent appeal process; any restriction on export should trigger the compensation mechanism described in Section V.

The utility itself (PREPA, and then LUMA) has operated this architecture for over seven years since the passage of Law 17 – 2019, with their processes codified as PREPA Technical Communiqués 19-02 (effective January 2020) and 20-01 (July 2020): automatic interconnection upon certification by a licensed professional, notification after the installation (with defined required paperwork) rather than an application, feeder saturation expressly “*no constituirá un impedimento*,” studies performed after interconnection, and a portal-based “*Registro Expedito*” whose registration notice simultaneously triggered the meter change, net-metering enrollment, and billing update. The regulation should codify — not regress behind — the utility's own published operating procedure, a procedure that is reflective and consistent with Law 114 of 2007, as amended by Law 17 of 2019.

II. The 90-Day Evaluation Ceiling and Deemed Approval (Systems Above 25 kW)

For systems above the automatic-interconnection threshold of 25 kW, Act 114-2007 § 9 caps the utility's evaluation at ninety (90) days from filing and supplies its own consequence: on noncompliance, the application “shall be automatically approved.” The July 13 draft contains no master clock; its step-by-step periods, added together, far exceed 90 days, and several steps carry no time limit at all. SESA and SUN recommend:

1. **One master clock.** Every utility step — completeness review, technical review, supplemental review or study, facilities work, agreement execution, inspection, and authorization to operate — should nest within 90 days of filing; the day-91 deemed-approval consequence should be codified in the rule's own text; and each sub-clock should be audited against the master so the arithmetic works on the face of the rule, with no step left uncapped.
2. **Deadlines, not “reasonable efforts.”** A “reasonable efforts” qualifier is not a compliance standard. Where the rule means a deadline, it should state one, with defined consequences for missing it.
3. **Supplemental review guardrails.** Any supplemental review should have objective, published triggers; a hard completion clock; a scope limited to the condition that triggered it; written findings the customer can contest; and an appeal path. A supplemental review should never reopen an executed agreement or a system already granted permission to operate, and should never be a precondition to operation for systems of 25 kW or less.
4. **No blind elections.** For systems under 25 kW all costs must be clear upfront, and systems over 25 kW should receive a binding good-faith cost estimate and construction schedule before being asked to elect whether to proceed, and the meaning and consequences of not electing must be defined.
5. **A certified limited-export alternative.** For systems above 25 kW, a voluntary limited-export election, using power control systems certified to UL 3141, should be available up front in every process path, so a customer may choose a certified export limit instead of

upgrades; and on loss of communications, a limited-export system should fall back to its certified export limit, not to zero. SESA and SUN also recommend an expedited review lane for mid-size commercial projects (for example, for systems between 25 kW and 250 kW) using PCS-limited export, whose grid impact is bounded by design.

6. **Automatic approval for no-export systems.** For systems above 25 kW, customers should have a pathway to present projects which do not backfeed in to the grid at all, and therefore require no evaluation of the utility. These systems should have a special notification process after-the-fact, or an ultra-short timeframe (such as 5 days) timeframe for the utility to sign off on such projects. Since there is no electricity flowing back onto the grid for these types of projects, the overall result is simply less electricity consumed by the customer from the power grid, similar to if they were to employ energy conservation or energy efficiency measures on their building.

III. Proactive Hosting Capacity Planning and Budgeting

Joint Resolution 5-2026, Section 2, directs that this regulation adopt “proactive hosting capacity planning and budgeting.” The July 13 draft does not include this required topic. This component is the durable answer to feeder-saturation concerns: studying, planning, and funding the grid as a whole, rather than reacting to each interconnection customer by customer.

SESA and SUN recommend a dedicated article built on the following elements, each drawn from jurisdictions operating such programs today:

1. **Periodic, forward-looking analysis.** Hosting capacity analysis performed and refreshed on a defined cadence — as in California (Rule 21's integration capacity analysis), Minnesota (annual updates), and Hawaii — and expressly tied to budgeting through the integrated resource plan and rate-case processes, as in Massachusetts and California.
2. **Published, validated data.** Feeder-level results published on the DG Portal with methodology, assumptions, and update cadence stated, and validated against field data. The Interstate Renewable Energy Council's Key Decisions for Hosting Capacity Analyses (2021) and Data Validation for Hosting Capacity Analyses (2022) provide a ready blueprint for both design decisions and data quality.
3. **Planning rather than rationing.** Constraints identified by the analysis should feed a budgeted upgrade program with completion schedules; any interim restrictions should be temporary, periodically reviewed, and lifted when the constraint clears.
4. **Reporting.** Monthly reporting should be required of interconnection volumes and installed distributed-generation and storage capacity, by feeder, so the analysis — and the Bureau's oversight of it — rests on real data.
5. **Dedicated docket.** The interconnection rule should include a dedicated article to mandate the initiation of a dedicated Energy Bureau docket on the topic, and establish the framework for content, frequency and other requirements of ongoing proactive hosting capacity planning and budgeting. This docket could be consolidated with any prior docket(s) with information and data that is relevant to proactive hosting capacity¹.

¹ Note:docket related cases; NEPR-MI-2019-0011, NEPR-MI-2020-0016

IV. Cost Determination and Cost Allocation

Joint Resolution 5-2026 names the transmission and distribution operator's costs for network studies among the concepts the regulation must address, and directs that the costs of any required modifications or improvements “*se determinarán conforme a los principios de razonabilidad, proporcionalidad y beneficio recibido, evitando que tales costos se trasladen, de forma injusta, a la totalidad de los clientes del sistema eléctrico*” — determined under the principles of reasonableness, proportionality, and benefit received, avoiding the unfair transfer of such costs to the totality of the electric system's customers. No methodology implementing these principles appears in the July 13 draft. SESA and SUN recommend:

1. **For systems of 25 kW or less: one fixed, all-inclusive fee.** Retain the \$300 fee (with the amount subject to Bureau review at set intervals) in the draft and define it as all-inclusive — covering administration, any studies, and any contribution to grid upgrades —. No individually assigned upgrade costs at this size: a fixed fee gives certainty to both the customer and the utility and eliminates surprise bills.
2. **For larger systems: itemized costs, before election.** A binding, itemized good-faith estimate and construction schedule delivered before the customer's election; costs limited to the least-cost facilities necessary for, and attributable to, the interconnection; and shared-benefit reimbursement where subsequently interconnecting customers make use of upgrades an earlier customer funded — the direct implementation of the Joint Resolution's proportionality and benefit-received principles.
3. **Date-certain completion.** Customer-funded upgrades should carry completion deadlines with defined remedies if missed — including release to full export where a system has been operating under a restriction while awaiting upgrades, and refund mechanisms where funded work is not performed.
4. **Customer choice.** A customer facing identified constraints should be able to elect a certified limited-export configuration (Section II) or a Bureau-approved cost-share alternative in lieu of upgrades; any restriction imposed rather than elected is compensable under Section V.

V. Compensation for Curtailment

Joint Resolution 5-2026, Section 2, requires this regulation to adopt “*compensaciones por pérdidas económicas a clientes que sufran restricciones en la exportación de energía (curtailment) asociadas a imposición de configuraciones en inversores*” — compensation for the economic losses of customers who suffer restrictions on the export of energy associated with the imposition of inverter configurations. The July 13 draft contains no compensation mechanism at all, even as it authorizes supplemental-review results to impose “restrictions on the amount of power that can be transferred,” including on systems already installed. New authority to restrict exports, with no compensation for the restriction, would invert the Joint Resolution's design; the rule must address this requirement. SESA and SUN recommend the mechanism include:

1. **Scope.** Any involuntary export restriction imposed through inverter or power-control-system configuration — whether imposed at interconnection or afterward — is compensable curtailment. Voluntary limited-export elections a customer makes under Section II are not.

2. **Measure and administration.** Compensation for the economic losses over the restriction's full duration — for example, crediting the exports foregone, estimated from system production modeling or the metered pre-restriction baseline, at the customer's applicable net-metering credit value — applied automatically on the bill, without requiring the customer to file a complaint to be made whole.
3. **Process.** Written findings before any restriction is imposed; duration limits with periodic review; and restoration of full export when the constraint clears, verified against the published hosting-capacity data (Section III) and the upgrade completion deadlines (Section IV).
4. **Right-sized incentives.** Because an imposed restriction carries a compensation obligation, the utility is oriented toward the outcomes the grid actually needs — completing upgrades, or accepting customers' voluntary certified export limits — rather than toward uncompensated curtailment as the default response to congestion.
5. **Need for workable solutions.** SESA and SUN are cognizant of the need to find workable solutions, and as such welcomes ideas for alternative mechanisms to make customers whole.

VI. Meter Socket Adapters

Joint Resolution 5-2026, Section 2, names “*adaptadores de base de contador* (meter socket adapters)” among the modern interconnection technologies this regulation shall adopt, and Act 114-2007 § 3 already directs that the meter be installed in the existing meter socket and bars additional requirements or socket relocation except where the National Electrical Code requires it. The July 13 draft does not mention the technology. SESA and SUN provide complete proposed rule text as Appendix B, drafted to the July 13 draft's own structure and defined terms, with every substantive obligation drawn from an instrument already in force in another jurisdiction — Maryland (COMAR 20.50.09.07), Colorado (C.R.S. § 40-2-124; HB26-1007), New Jersey (N.J.S.A. 48:3-111.1), Massachusetts (M.G.L. c. 164 § 151), Connecticut (PURA Docket 24-08-02), and PG&E Electric Rule 31. Whatever text the Bureau adopts, SESA and SUN recommend it ensure the following concepts are present:

1. **In the Regulation, not the TIR.** The criteria, clocks, and appeal rights belong in the rule the Bureau approves; the Technical Interconnection Requirements may implement the article but should not add to, restrict, or condition it.
2. **Right to use, customer ownership, and equal access.** Use of an approved meter socket adapter may not be a ground to deny, condition, or delay any interconnection step; the device is customer-owned; and any model meeting the published criteria is approved — equal, multi-vendor access with no exclusivity.
3. **Objective model approval on a clock.** A published approved-model list against closed criteria — certification by a Nationally Recognized Testing Laboratory to UL 414 (the standard governing meter socket adapters) and its applicable supplements, plus the standards applicable to the device's other functions as determined by the NRTL; National Electrical Code supply-side permissibility; sealability; and no impairment of meter accuracy or communications — decided within twenty (20) Business Days of a complete request, with deemed approval on silence, written denials, and appeal to the Bureau.

4. **A qualified-installer pathway.** Installation, service, and removal by qualified installers — licensed professionals working under contractors registered within twenty (20) Business Days and trained at no charge — with two (2) Business Days' advance notice, utility-furnished tamper-evident seals, and before-and-after photo documentation, and with no utility site visit as a precondition.
5. **No fees and no process penalty.** No charge, fee, or deposit absent express Bureau authorization; use of an approved device is not a Material Modification, requires no separate application, and cannot cause a screen failure or trigger a supplemental review.
6. **The utility's operational needs, met.** The proposed text grants each of the five operational needs the utility has stated on the record — inspection and removal authority, scope limits (single-phase services of 200 amperes or less), defined liability, certification and notification procedures, and sealing — each with criteria, clocks, and an appeal attached.

Full proposed rule text — new definitions, a complete new Section 8.03, and conforming amendments regarding Meter Socket Adapters — is included as Appendix B.

APPENDIX B

APPENDIX B

Proposed Meter Socket Adapter Rule Text

Drafted to the July 13 draft's structure, defined terms, and conventions ("EPS Operator," "Interconnection Customer," "Business Day," "Cyber Portal," "DG Portal," "Material Modification"), and written to be incorporated directly into the Energy Bureau's next draft. Every substantive obligation is drawn from an instrument already in force in another jurisdiction, including Maryland COMAR 20.50.09.07; Colorado C.R.S. § 40-2-124 and HB26-1007; New Jersey N.J.S.A. 48:3-111.1 and the JCP&L service guide; Massachusetts M.G.L. c. 164 § 151; the Connecticut PURA order in Docket 24-08-02; and PG&E Electric Rule 31.

A.1 Amendment to Section 1.02 (Legal Basis)

Insert after "Act 17-2019, known as the Puerto Rico Energy Public Policy Act;":

"Act 114-2007, as amended, known as the Puerto Rico Net Metering Act; Joint Resolution 5-2026 (R.C. de la C. 193);"

A.2 New definitions in Section 1.09

"Meter Socket Adapter" or "MSA" – means a device installed in the existing primary meter socket behind the utility meter at an Interconnection Customer's premises for the purpose of interconnecting a Distributed Generation System, Energy Storage, standby generation, transfer equipment, electric vehicle supply equipment, or other load and energy-management applications. A Meter Socket Adapter is equipment owned by the Interconnection Customer and is not part of the Electric Power System.

"Qualified MSA Installer" – means a person performing the installation, servicing, inspection, or removal of a Meter Socket Adapter who (1) is an engineer or expert electrician authorized to practice in Puerto Rico, or works under the direct supervision of one; (2) is employed by or under contract to a contractor registered with the EPS Operator pursuant to Section 8.03.E; and (3) has completed the training made available by the EPS Operator pursuant to Section 8.03.E.

A.3 New Section 8.03 — Meter Socket Adapters

Section 8.03. Meter Socket Adapters

A. Purpose and applicability.

1. This Section implements Section 2 of Joint Resolution 5-2026, which requires that this Regulation adopt meter socket adapters as a modern interconnection technology, and Section 3 of Act 114-2007, as amended.
2. This Section applies to Meter Socket Adapters installed in single-phase services rated two hundred (200) amperes or less, and to other service or meter-socket configurations where the Meter Socket Adapter is NRTL listed for that configuration. The EPS Operator shall not withhold approval of a Meter Socket Adapter for use at another service or meter-socket configuration where the Meter Socket Adapter is listed by a Nationally Recognized Testing Laboratory for that configuration.

B. Right to use.

1. An Interconnection Customer may install and use a Meter Socket Adapter approved under subsection C. The EPS Operator shall not deny, condition, or delay an Interconnection Application, a Simplified Interconnection Notification, an endorsement, an authorization for Parallel Operation, the installation or configuration of a Meter, or enrollment in a Net

Metering Program on the ground that the interconnection incorporates an approved Meter Socket Adapter.

2. Consistent with Section 3 of Act 114-2007, as amended, the EPS Operator shall install the Meter in the existing meter socket and shall not establish additional requirements, reject requests, deny endorsements, or require the relocation or replacement of an existing meter socket, whether through this Regulation, the Technical Interconnection Requirements, technical orders, directors' orders, or otherwise, except where the location of the existing meter socket fails to meet the safety standards of the National Electrical Code then in force.

3. A Meter Socket Adapter is owned by the Interconnection Customer. Ownership does not transfer to the EPS Operator or to PREPA.

4. Only one (1) Meter Socket Adapter may be installed in a meter socket. Meter Socket Adapters shall not be stacked.

C. Approval of Meter Socket Adapter models.

1. No later than thirty (30) Business Days after the effective date of this Regulation, the EPS Operator shall publish and maintain on the DG Portal: (a) the minimum product and technical requirements for Meter Socket Adapters, which shall not exceed the criteria in Section 8.03.C.2; (b) the installation procedures required by Section 8.03.D; (c) the list of Meter Socket Adapter models approved for use in Puerto Rico; and (d) a dedicated electronic mail address and submission instructions for model evaluation requests.

2. The EPS Operator shall approve a Meter Socket Adapter model that meets the following criteria:

a. It is certified or listed by a Nationally Recognized Testing Laboratory to UL 414 and the supplements or successor requirements applicable to meter socket adapters, including meter socket adapters with provisions for connection of distributed generation, energy storage, standby generation, transfer equipment, electric vehicle supply equipment, or other load and energy-management applications; and it complies with each other standard applicable to the specific function the device itself performs. UL 1741 and IEEE Std 1547-2018 (or successor) apply only where the device includes inverter or interconnection system equipment functions that intentionally parallel with the EPS. UL 1008M, UL 1008, or another transfer-equipment standard applies only where the device itself performs the corresponding transfer-switching function, and the EPS Operator shall not condition approval of a Meter Socket Adapter on UL 1008M where the model is not represented or listed as a meter-mounted transfer switch;

b. It is permitted to be connected on the supply side of the service disconnecting means under the National Electrical Code then in force;

c. It provides means for the EPS Operator to apply its lock or seal, and it does not impede access to the sealed meter socket compartment or to the pull section of the service section.

3. The EPS Operator shall approve or deny a model in writing within twenty (20) Business Days after receiving a complete evaluation request from a manufacturer, an Interconnection Customer, or a registered contractor. If the EPS Operator neither approves nor denies the model within that period and has not obtained an extension from the Energy Bureau for good cause shown, the model shall be deemed approved and the EPS Operator shall add it to the published list within five (5) Business Days.

4. The EPS Operator shall not require testing beyond Nationally Recognized Testing Laboratory listing, except a verification that the Meter Socket Adapter does not impair Meter accuracy or Meter communications. Such verification shall be performed at the EPS Operator's expense and completed within the period in Section 8.03.C.3. The EPS Operator shall accept equivalent verification results obtained by a manufacturer or another electric utility for the same model, unless the EPS Operator identifies in writing a material difference between the metering and communications equipment used to obtain those verification results and its own.

5. A denial shall be in writing and shall identify the specific criterion in Section 8.03.C.2 that the model fails to meet and the evidence supporting that determination. Where the EPS Operator has previously approved a model that performs comparable functions, the denial shall explain the differences between the denied model and the approved model. A denial may be appealed to the Energy Bureau under Section 13.02.

6. The EPS Operator shall update the published list of approved models within ten (10) Business Days after each approval, and shall review the list at least annually.

D. Installation, servicing, and removal.

1. An approved Meter Socket Adapter may be installed, serviced, inspected, and removed by the EPS Operator or by a Qualified MSA Installer. Where a Qualified MSA Installer performs the work, the removal and reinstallation of the Meter for that purpose is authorized, and no site visit by the EPS Operator shall be required as a condition of the installation or of authorization for Parallel Operation.

2. A Qualified MSA Installer shall:

- a. notify the EPS Operator through the Cyber Portal not less than two (2) Business Days before removing the Meter, identifying the service address, the Meter serial number, and the approved Meter Socket Adapter model;
- b. before reinstalling the Meter, inspect the meter socket enclosure, jaws, lugs, and conductors, and not proceed where that inspection discloses a condition that would prevent the Meter from being reinstalled properly and safely;
- c. apply a numbered tamper-evident seal furnished by the EPS Operator at no charge; and
- d. submit a completion notice through the Cyber Portal within one (1) Business Day, including the seal number and photographs of the meter socket before and after the installation.

3. The EPS Operator shall furnish tamper-evident seals at no charge, shall make training available at no charge in both Spanish and English, and shall register a contractor that meets the requirements of this Section within twenty (20) Business Days after a complete registration request. The EPS Operator may suspend or revoke a registration for cause, by written notice stating the basis, subject to review under Section 13.02.

4. Where the EPS Operator elects to perform the removal and reinstallation of the Meter itself, it shall do so within ten (10) Business Days after the Interconnection Customer's request, in a timely manner and at no additional cost to the Interconnection Customer.

E. Treatment in the interconnection process.

1. The use of an approved Meter Socket Adapter is not a Material Modification.

2. The use of an approved Meter Socket Adapter shall not, of itself, render an interconnection ineligible for the Simplified Process under Article 3 or for the Fast Track Process under Article 4, and shall not cause an Interconnection Application to fail any screen or trigger a Supplemental Review.

3. The Simplified Interconnection Notification and the Interconnection Application shall each include a field identifying the approved Meter Socket Adapter model to be used. No separate application, agreement, or fee shall be required.

F. Charges.

No charge, fee, or deposit shall be imposed on an Interconnection Customer, a manufacturer, or a registered contractor in connection with the evaluation, approval, installation, inspection, sealing, or removal of a Meter Socket Adapter, except as expressly authorized in advance by the Energy Bureau in accordance with Section 4 of Act 114-2007, as amended. The EPS Operator's costs of evaluating Meter Socket Adapter models are costs of compliance with this Regulation.

G. Safety, access, and responsibility.

1. The EPS Operator retains the right to inspect a Meter Socket Adapter. Where the EPS Operator determines that a Meter Socket Adapter is impairing the accuracy, communications, or safe operation of the Meter, it may require correction or removal by written notice stating the basis for the determination and allowing not less than ten (10) Business Days to cure. Where an immediate hazard to persons or property exists, the EPS Operator may remove the Meter Socket Adapter without prior notice and shall provide written notice stating the basis within two (2) Business Days.

2. The Interconnection Customer is responsible for the Meter Socket Adapter and for its maintenance. The EPS Operator shall not be liable for damage to any person or property attributable to a Meter Socket Adapter installed under this Section, except to the extent the damage is caused by the negligence or willful misconduct of the EPS Operator.

3. The EPS Operator may recover from the Interconnection Customer, in accordance with its approved tariff, the reasonable cost of repair to EPS Operator equipment necessitated by the installation or operation of a Meter Socket Adapter.

H. Relationship to the Technical Interconnection Requirements.

The Technical Interconnection Requirements may implement this Section but shall not add to, restrict, or condition the requirements of this Section. Any provision of the Technical Interconnection Requirements concerning Meter Socket Adapters shall be submitted to the Energy Bureau for review and approval under Section 8.01 and shall be subject to stakeholder comment before approval.

A.4 Conforming amendments

Article 3.A(2) (Simplified Process eligibility screens) — add: “The use of a Meter Socket Adapter approved under Section 8.03 shall not cause an interconnection to fail any screen in this Section.”

Section 6.02 (meter installation) — add to the sentence requiring the EPS Operator to install and configure meters within twenty working days: “...and shall install the Meter in the existing meter socket, except where an approved Meter Socket Adapter is installed in that socket, in which case the Meter shall be installed into the Meter Socket Adapter.”

Section 12.02 (Annual Interconnection Report) — add: “The number of Meter Socket Adapter models submitted for evaluation, approved, and denied; the reasons stated for each denial; the average and maximum number of Business Days from submission to decision; the number of Meter Socket Adapter installations completed, identified by whether the work was performed by the EPS Operator or by a Qualified MSA Installer; the number of registered contractors, and any registration suspended or revoked with the reason stated; and the number of Meter Socket Adapters whose correction or removal was required, with the reason stated.”