NEPR-MI-2019-0009 · VIRTUAL STAKEHOLDER WORKSHOP · AUGUST 25, 2026

SESA INPUT FOR INTERCONNECTION RULE WORKSHOP

Comments on the July 13 Revised Preliminary Draft — Distributed Generation & Microgrid Interconnection Regulation

Solar and Energy Storage Association of Puerto Rico (SESA)

SESA & SUN Comments filed August 14, 2026

STATUTORY REQUIREMENTS FOR INTERCONNECTION RULE

1 **Automatic interconnection — systems ≤ 25 kW**

Act 114-2007, as amended by Act 17-2019

2 **90-day cap + automatic approval — systems > 25 kW**

Act 114-2007, as amended by Act 17-2019

> ***"adoptará tecnologías y conceptos modernos de interconexión, incluyendo: ____________"***
>
> "[The regulation] shall adopt modern interconnection technologies and concepts, including: ____________"
>
> — Joint Resolution 5-2026 § 2

3 **Proactive hosting capacity planning & budgeting**

Planning for the Future

4 **Cost methodology — studies & upgrades**

Reasonableness, proportionality, benefit received

5 **Curtailment compensation**

Compensation for economic losses

6 **Meter socket adapters**

Faster, cheaper, safer installations

SYSTEMS ≤ 25 kW

SIMPLIFIED PROCESS

LAW 17-2019: CONSTRUCT, CERTIFY, CONNECT, NOTIFY

> *"…generation capacity does not exceed* ***25 kilowatts*** *shall be* ***interconnected automatically*** *…shall* ***begin operating automatically*** *once an electrical engineer or an expert electrician …certifies the compliance thereof... It* ***shall not be necessary to submit an application for interconnection*** *in order for the systems identified herein to be* ***deemed interconnected*** *and to* ***activate net metering****."*
>
> Act 114-2007, as amended by Act 17-2019

1 CONSTRUCT
Licensed installer builds it

→

2 CERTIFY
Engineer or expert electrician

→

3 CONNECT
System begins operating

→

4 NOTIFY
Utility informed

No application — & no prior utility approval needed

Act 114-2007, as amended by Act 17-2019

Net metering on the bill — within thirty (30) days

Act 114-2007, as amended by Act 17-2019

SIMPLIFIED PROCESS

ALIGNING THE DRAFT WITH THE STATUTE

SYSTEMS ≤ 25 kW

LAW 17-2019 REQUIRES

Construct

↓

Certify

↓

Connect

↓

Notify

JULY 13 DRAFT

NOT IN ALIGNMENT WITH ACT 17-2019

1 Notification + fee
2 Completeness review — 5 days
3 Eligibility screens — 15 business days
4 Utility signs approval
5 Install
6 Field inspection & testing
7 Authorization to operate — 3 days

+ **"supplemental review" — possible at any time**

…could cause new costs & export limits after construction

SIMPLIFIED PROCESS

DEFINING SUPPLEMENTAL REVIEW

SYSTEMS ≤ 25 kW

1

Define the trigger

Clear written criteria

2

Set the clock

Fits the 15-business-day window

3

Bound the scope

Any limits defined up-front, applicable prospectively only

4

Keep approvals final

No reopening after signing & install

A final approval needs to stay final — that is what makes upfront clarity possible.

UPFRONT CLARITY: timeline, cost, and terms — terms need to be known upfront.

APPROVAL TIMELINE

90 DAYS TOTAL APPROVAL TIMELINE

SYSTEMS > 25 kW

> “[The utility] shall evaluate the application for interconnection as established in the interconnection regulations. Such evaluation, however, **shall not exceed ninety (90) days from the filing thereof**. In the event of noncompliance with the term provided, the application for interconnection **shall be automatically approved**…”
>
> Act 114-2007 § 9

EXAMPLES OF CURRENT TIMELINES

35%
of completed evaluations exceeded 90 days

1,064 days
installation → net metering (B&B Manufacturing)

589 days
evaluation waiting on a construction permit (Nuscan, Caguas)

Source: Windmar Commercial (SESA member) — 52+ tracked commercial interconnections, filed in this docket Aug 14, 2026

FEATURES NEEDED FOR 90-DAY APPROVAL IMPLEMENTATION

- **One 90-day clock — day 91 = approved**
- **Written cost estimate before the customer decides**
- **Limited-export option from the start (UL 3141)**
- **Not dependent on OGPe or any other agency timeline**
- **Inspection & net metering on a fixed timeline**

COST ALLOCATION

PREDICTABLE COSTS, CLEAR UPFRONT

“razonabilidad, proporcionalidad y beneficio recibido… evitando que tales costos se trasladen, de forma injusta, a la totalidad de los clientes”

TEXT OF THE LAW

“Reasonableness, proportionality, and benefit received… avoiding the unfair transfer of such costs to all customers” — Joint Resolution 5-2026 § 2

SYSTEMS ≤ 25 kW

$300

One fixed, all-inclusive, known upfront fee

Covers administration, studies & upgrades

SYSTEMS > 25 kW

Simple tiered, known amounts — up to set limits

Above the limits: actual upgrade costs only

Written cost estimate & schedule before the customer decides

NEXT STEPS

OUR ASK

1

Publish a complete first draft
→ and give ample time for stakeholder review)

All six statutory components — in the text, open for comment

2

Engage the technical entity with deep interconnection experience to work with stakeholders

“alto expertise y sustancial experiencia previa probada” — high expertise and proven prior experience — in interconnection rulemaking

3

Design for Known Upfront Costs for the Customer

Timeline, cost, terms — need to be clear upfront

METER SOCKET ADAPTERS (MSAs)

WHAT THE RULE SHOULD PROVIDE

Customer right to use MSAs, as a component of their solar/storage system

MSAs should not be a reason to deny, condition, or delay

MSAs are Customer-owned

Not part of the utility's system

Approval on a clock

UL 414 criteria · 20 business days utility review · silence = approved

No Utility Site Visit Required

Licensed installers / electricians remove & re-install meter.

No fees. No penalty.

MSAs are not a "Material Modification" — cannot make a screen fail

Utility's needs met

Inspection · scope · liability · certification · sealing

In the Regulation — not the TIR.

The TIR implements it — the Regulation needs to define it.

Stakeholder input needed on SESA draft filed complete, rule text — (Appendix B of Aug 14th filing)

Based on what works well elsewhere, including: MD · CO · NJ · MA · CT · PG&E Rule 31

Status in the July 13 draft:

Not yet included.