

Agenda

9:30-9:40 Introductions

9:40-10:40 Simplified Process for Interconnection

- Overview of statutory requirements and draft regulation by Energy Bureau Consultants
- Presentation by the Solar and Energy Storage Association of Puerto Rico (SESA) and Solar United Neighbors (SUN) on their position
- Presentation by LUMA on their position
- Discussion and Q&A

10:40-11:45 Cost Allocation (application, studies, system upgrades costs)

- Overview of statutory requirements and summary of stakeholder comments by Energy Bureau Consultants Discussion

11:45-12:25 Meter Socket Adapters

- Presentation by SESA and SUN on meter socket adapter proposal
- Feedback and Q&A

12:25-12:30 Next Steps

Stakeholder Comments

- Josué A. Colón Ortiz, Puerto Rico Energy Czar
- The Independent Consumer Protection Office (OIPC)
- LUMA
- Solar and Energy Storage Association (SESA) and Solar United Neighbors (SUN)
- AZ Engineering
- Barrio Eléctrico
- Robert A. Garcia Cooper
- Carlos López Maisonave
- Windmar Commercial

Simplified Process for Interconnection

Statutory Requirements

Act No. 114-2007, as amended (Net Metering Program Act)

- Section 9 (a)-(d) (22 L.P.R.A. § 1019) DG systems less than 25 kW
 - Shall be interconnected automatically to the transmission and distribution network.
 - Shall begin operating automatically once a professional engineer or an expert electrician, ... certifies the compliance thereof with the regulatory technical requirements for interconnection to the distribution network.
 - Shall not be necessary to submit an application for interconnection to be deemed interconnected and to activate net metering.
 - The fact that the feeder exceeds its capacity shall not constitute an obstacle for interconnection. In such cases, the necessary improvements and/or changes to be made to the feeder shall be defrayed by the requesting company.
 - None of the provisions of this Section prevent the subsequent review of the correction of the certification of the distributed generator.
- Section 10 (22 L.P.R.A. § 1020)
 - Regulations shall be consistent with the public policy on interconnection set forth in Section 9 of this Act and shall ensure the reliability and safety of the electric power system.

Statutory Requirements

Act No. 17-2019 (Puerto Rico Energy Public Policy Act)

- Section 1.5(8)(a)(b) Distributed Energy, Energy Storage, and Technology Integration.
 - Ensure the integration of renewable energy into the Electrical System in a safe and reliable manner and at a reasonable cost
- Section 1.5(9)(d)(e) Infrastructure Design, Resilience, Maintenance, and Security.
 - To conduct the appropriate planning studies on the operating voltages of the transmission and distribution system in order to ensure the reliable operation thereof ... shall not exclude the possible use of Volt-Var Optimization as an efficiency technology.
 - Maintain the electric power infrastructure in optimal conditions to ensure the reliability, resilience, and safety of the electric power service.

Cost Allocation

Statutory Requirements

Article 9(c) of Act No. 114-2007

- Establishes that “necessary upgrades and/or changes to the feeder shall be at the expense of the requesting company.”

Joint Resolution 5-2026

- No Supplemental Study fee will be charged for any photovoltaic system whose generation capacity is less than or equal to 25kW.
- Costs associated with any required modifications or upgrades shall be determined based on principles of reasonableness, proportionality, and benefit received, ensuring that such costs are not unfairly passed on to the entire customer base of the electric power system.
- The methodology for determining cost allocation shall be established by the Energy Bureau through regulation.

Interconnection Fees

≤ 25 kW Systems

Support for \$300 Notification Fee

- Energy Czar
- SESA/SUN but define as all-inclusive covering administration, any studies, and any contribution to grid upgrades

Concerns with proposed fee

- LUMA
 - Fee should be in TIR
 - Change from net metering notification fee to an interconnection notification fee
- Carlos López Maisonave:
 - Include exact fee and define services it recovers, publish supporting cost analysis, fixed maximum
 - Future adjustments should require public notice and comment, Energy Bureau order

Fast Track

- OIPC
 - Processing fee or clear methodology for determining fee should be included in the regulation.
 - Also request standards on future modifications, no unilateral determination by EPS Operator.

Supplemental Study Costs

- Energy Czar
 - All study costs tied to the DG proponent's project
- OIPC
 - Establish criteria and methodology for determining the costs that may be charged for a Supplemental Review
 - Cost certainty for customer – itemized cost estimate that remains binding for period of time
 - Specify deposit amount (\$ or %) for supplemental review deposit
- LUMA
 - Customer should be responsible for the cost of the supplemental study
 - Non-binding, good faith estimate of the study costs

Allocation of Electric System Costs

- Energy Czar
 - All infrastructure upgrade costs tied to the DG proponent's project
- OIPC
 - Consider whether the need is attributable, in whole or in part, to previously interconnected projects that failed applicable screens but were nevertheless permitted to interconnect by the EPS Operator.
 - Subsequent customers could be required to bear costs resulting, at least partially, from the EPS Operator's prior decision to permit another project to interconnect notwithstanding its failure to satisfy the applicable screening criteria.
- LUMA
 - Queue Position of each Interconnection Application will be used to determine the cost responsibility for the upgrades required to accommodate the interconnection.

Allocation of Electric System Costs, cont.

- SESA/SUN
 - Shared-benefit reimbursement where subsequently interconnecting customers make use of upgrades an earlier customer funded
 - A customer facing identified constraints should be able to elect a certified limited-export configuration or a Bureau-approved cost-share alternative in lieu of upgrades
- Carlos López Maisonave
 - Residential ≤ 25 kW Systems
 - Identify which costs are prohibited and which, if any, can be assigned to the customer
 - Concerned with charging the entire cost to the last homeowner to submit an application
 - Address costs of transformer replacement, secondary conductors, customer service work, voltage regulation, and feeder work separately.
 - Require a showing that any permissible charge is caused solely and incrementally by the individual installation; allocate or credit broader grid benefits; establish a maximum customer exposure; and require Energy Bureau approval before a homeowner is billed for a utility-side upgrade

Next Steps

Proposed Next Steps

- Monday, September 21. Workshop 3
- Monday, October 5. Post-workshop comments due
- Late October. Workshop 4
- Friday, November 13. Notice of Proposed Regulation published and 30-day comment period
- Monday, December 14. Comments deadline
- Thursday, January 7. Statutory deadline for enacting regulation