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

IN RE: INTERCONNECTION REGULATIONS	**CASE NO.:** NEPR-MI-2019-0009 CEPR-MI-2018-0008 **SUBJECT:** LUMA's Comments on the Second Draft of the Proposed Distributed Energy Resources Interconnection Regulation

MOTION TO SUBMIT COMMENTS ON SECOND DRAFT OF PROPOSED DISTRIBUTED ENERGY RESOURCES INTERCONNECTION REGULATION

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC and **LUMA ENERGY SERVCO, LLC** (collectively, "LUMA"), through the undersigned legal counsel, and respectfully state and request the following:

I. Relevant Procedural Background

1. On July 13, 2026, the Energy Bureau issued a *Resolution and Order* containing a Revised Preliminary Draft of the Distributed Generation and Microgrid Interconnection Regulation (the "Revised Preliminary Draft") and invited stakeholders to submit comments thereon. On August 14, 2026, LUMA submitted comprehensive comments on the Revised Preliminary Draft, together with a redlined and annotated version thereof. *See LUMA's Motion to Submit Comments and Proposed Revisions to the Revised Preliminary Draft Distributed Generation and Microgrid Interconnection Regulation* (Aug. 14, 2026).

2. On September 15, 2026, the Energy Bureau issued a *Resolution and Order* setting forth the agenda for the September 21, 2026 Virtual Stakeholder Workshop and establishing a

rulemaking schedule under which comments on the second draft of the interconnection regulation would be due on November 6, 2026.

3. On October 16, 2026, the Energy Bureau issued a *Resolution and Order* (the "October 16th Order") publishing the Second Draft of the Distributed Energy Resources Interconnection Regulation (the "Second Draft") and renewing its invitation for stakeholders to submit comments on or before November 6, 2026. In the October 16th Order, the Energy Bureau requested that stakeholders submit their comments in the form of redlined edits to the Second Draft, accompanied by supporting comments, where necessary, to explain the positions taken.

4. In compliance with the October 16th Order, LUMA hereby submits its comments on the Second Draft, as set forth below.

II. Submission of Comments

5. LUMA respectfully submits, as **Exhibit 1**, its *General Comments on Distributed Energy Resources Interconnection Regulation, Second Draft*, which present LUMA's overarching observations on the Second Draft.

6. LUMA further submits, as **Exhibit 2**, a redlined version of the Second Draft reflecting LUMA's proposed revisions, together with additional comments and recommendations intended to strengthen the Second Draft, in accordance with the format requested by the Energy Bureau.[1]

WHEREFORE, LUMA respectfully requests that this Honorable Energy Bureau **TAKE NOTICE** of the foregoing; **ACCEPT** LUMA's comments, submitted herewith as **Exhibit 1** and

[1] Exhibit 2 is submitted in both PDF and Word formats. Certain sections of Exhibit 2 contain placeholder references because those references depend on multiple interrelated revisions proposed by LUMA. In addition, given the complexity of formatting the redlined document, Exhibit 2 may contain errors in its internal cross-references. LUMA further notes that certain sections already cited in Exhibit 2 may have changed as a result of the proposed revisions. LUMA respectfully requests that the Energy Bureau consider these limitations in reviewing Exhibit 2.

Exhibit 2 in compliance with the October 16th Order; and **CONSIDER** such comments in developing the proposed Distributed Energy Resources Interconnection Regulation.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 6th day of November 2026.

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November 2026, I filed the foregoing motion with the Clerk of the Puerto Rico Energy Bureau through the Energy Bureau's electronic filing system.

In Guaynabo, Puerto Rico, on the 6th day of November 2026.

/s Katiuska Bolaños Lugo
Katiuska Bolaños Lugo