

PREPA Publishes Draft Interconnection Regulations

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On September 9, 2016, the Puerto Rico Electric Power Authority (“PREPA”) published its draft Regulation to Interconnect Generators with the Electric Distribution System of the Puerto Rico Electric Power Authority and Participate in the Net Metering Programs (“Draft Distribution System Interconnection Regulation”).

The Draft Distribution System Interconnection Regulation proposes a regulatory framework which, among other things:

- Establishes an expedited plug-and-play interconnection process for systems with a generation capacity of less than 10kW installed in residences and businesses, the applications for which PREPA must approve or deny within ten (10) business days.
- Allows applicants to notify PREPA with at least ten (10) working days in advance of the acceptance testing of installed systems; if PREPA personnel is absent for such testing, PREPA cannot demand additional acceptance testing inspections.
- Permits the interconnection of fully installed and tested systems once electrical certifications have been duly prepared and electronically submitted to PREPA.
- For applications for systems with a generation capacity of 10kW up to 1MW, requires PREPA to issue an evaluation letter within ten (10) business days and endorse drawings within five (5) business days of the filing of certified design drawings prepared in accordance with the requirements of the evaluation letter. Systems with a capacity of 500kW or more must include a coordination study with relay protection adjustments and must be inspected by PREPA.
- Provides for the preparation of a supplemental study within 180 days of issuance of the evaluation letter for systems that are based on inverter technology but do not meet the criteria for the expedited interconnection process.
- Permits the electronic filing or submittal of documents, including electrical drawings, acceptance testing certifications, and digitally signed interconnection and net metering agreements. However, it is not clear whether electrical installation certifications can be electronically submitted.

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- Requires meter relocations only in cases where the current location is not in compliance with National Electrical Code safety standards.
- Creates an Aggregate Net Metering Program exclusively for government entities and not-for-profit university institutions and a Shared Metering Program exclusively for residential and commercial clients subject to the horizontal property regime.
- Exempts clients authorized to interconnect an inverter-based system with a capacity of less than 300kW from obtaining a general liability insurance policy.
- Requires clients with interconnection and net metering agreements currently in force to renew them upon expiration based on the new, consolidated interconnection and net metering agreements, attached as an annex of the Draft Distribution System Interconnection Regulation.

PREPA also published the draft Regulation to Interconnect Generators with the Electric Transmission or Subtransmission System of the Puerto Rico Electric Power Authority and Participate in the Net Metering Programs (“Draft Transmission System Interconnection Regulation”), which would apply to distributed generation systems with a capacity of 5 MW or less to be interconnected with PREPA’s transmission or subtransmission system. Among others:

- Applications under the Draft Transmission System Interconnection Regulation would require additional technical information due to the complexity of the systems.
- For systems with a capacity of 500kW or more, a coordination study with protection adjustments would also be required.
- For systems with a capacity of 1MW or more, clients or authorized representatives must perform acceptance testing according to the attached General Guidelines on Acceptance Testing for the Interconnection of DG’s Greater than 1MW up to 5MW with PREPA’s Electrical Transmission or Subtransmission System.
- PREPA must notify deficiencies in the system within five (5) business days after conducting its inspection.
- For systems with a capacity greater than 1MW, a report containing proposed strategies to comply with technical requirements is required.

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Any person wishing to present comments must do so within thirty (30) days of publication of the draft Regulations to the electronic address reglamento@prepa.com or the mailing address Autoridad de Energía Eléctrica de Puerto Rico, Reglamentos para Interconectar Generadores y Programa de Medición Neta, Departamento de Estudios y Procedimientos Corporativos, PO Box 364267, San Juan, PR 00936-4267.

PREPA will hold two (2) public hearings on the following dates and locations:

- October 18, 2016, Salón de la Comunidad Centro del Sur Mall, Blvd. Miguel A. Pou, Km. 26.4, Ponce, Puerto Rico.
- October 19, 2016, Salón de Conferencias A, Edif. Ruiz Vélez, Ave. Ponce de León, Pda. 16 ½, Santurce, Puerto Rico.

Both hearings will take place from 9am to 3pm. Copies of the draft Regulations can be obtained [online](#) or at PREPA's headquarters, Departamento de Estudios y Procedimientos Corporativos, in Edificio Antonio Lucchetti, Second Floor, Office 206, Stop 16½, Santurce.

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