CONFIDENTIAL TREATMENT REQUESTED

Customer Complaint Procedure

For Distributed Generator / Demand Response services offered in Puerto Rico, including participation under LUMA's Battery Emergency Demand Response Program

Effective Date: [___________]
Last Updated: [___________]

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1. Purpose

Before enrolling Customers, Power Financial Services LLC ("Power Financial Services") will publish and provide this procedure to explain how a Customer can file a complaint regarding: (i) Demand Response ("DR") services, (ii) event participation, (iii) incentives/compensation, (iv) enrollment/termination, (v) customer support, and (vi) privacy and the handling of Customer information.

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2. Scope

This procedure applies **to all Customers** receiving DR-related services from Power Financial Services, including services where Power Financial Services operates as a **Distributed Generator / DR service provider** and interfaces with program administrators and/or LUMA for event dispatch, measurement, settlement, and incentive processing.

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3. Key Definitions

- **Complaint / Grievance:** Any Customer allegation of error, unfairness, delay, miscalculation, misconduct, service failure, or rights violation connected to Power Financial Services DR services or compensation.
- **Determination:** Power Financial Services' written decision resolving a Complaint.
- **Business Day:** Monday–Friday, excluding Puerto Rico legal holidays.
- **Customer Information:** Private, personal, confidential, or proprietary information (including usage data, battery/DER data, contact info, identifiers, and any data covered by contract, privacy policy, or applicable law).

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4. How Customers file a complaint with Power Financial Services

4.1 Where to submit

Power Financial Services will accept complaints through **any** of the following channels (and will publish the current contact details on its website and enrollment materials):

1. **Email**
2. **Phone**
3. **Online Form**
4. **Mail/In-Person**

4.2 Time period to submit

Customers should submit a complaint **within thirty (30) calendar days** of whichever occurs later:

- the DR event / service issue, **or**
- the date the Customer receives the relevant compensation statement, report, or notice.

If the issue involves **privacy/data disclosure**, the Customer should submit the complaint **as soon as they become aware** of the concern.

4.3 What the complaint should include (minimum)

- Customer name, service address, and **account ID** (or enrollment reference)
- Preferred contact method
- A clear description of the issue (what happened, dates/times, relevant DR event if known)
- What resolution is requested (ex: recalculation, payment correction, opt-out, termination, data deletion)
- Any supporting documents (screenshots, emails, settlement/incentive statements)

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5. Intake, tracking, and acknowledgement

5.1 Case number and acknowledgement

- Power Financial Services will log each complaint and assign a **case number**.
- Power Financial Services will acknowledge receipt **within seven (7) Business Days**, confirming:
    - case number,
    - summary of the complaint,
    - next steps and expected timeline,
    - any immediate information needed.

5.2 Urgent issues

If a complaint alleges:

- imminent safety risk, equipment hazard, or emergency conditions, the Customer should contact **911** and/or the relevant utility emergency channels immediately.

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6. Investigation process

Power Financial Services will investigate by using information reasonably necessary to resolve the issue, which may include:

- enrollment records and customer authorizations
- DR event logs, notifications, and opt-out records
- metering/telemetry/battery dispatch records (as applicable)
- incentive calculations, settlement records, and payment history
- communications history (calls/emails/messages)

Power Financial Services may contact the Customer for clarification and may request additional documentation. Power Financial Services will keep the Customer reasonably updated if the investigation is delayed.

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7. Resolution timelines

7.1 Standard resolution timeline

- Power Financial Services will issue a written **Determination** within **fifteen (15) Business Days** after acknowledgement.

7.2 Extended timeline for complex cases

If more time is needed (e.g., third-party data dependencies, settlement disputes, measurement issues), Power Financial Services may extend up to **thirty (30) Business Days**, but must:

- notify the Customer before day 15,
- explain why more time is needed,
- provide a revised expected decision date.

7.3 Payment/compensation corrections

If the complaint concerns compensation:

- Power Financial Services will provide the Customer, in plain language, the basis for the calculation (events included, measurement approach used, any adjustments, and payment timing).
- If Power Financial Services finds an error, Power Financial Services will correct it and issue any owed amount **as soon as administratively feasible**, typically in the next payment cycle or earlier when practicable.

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8. Written Determination

Power Financial Services' Determination will be provided by email or mail and will include:

- case number and summary of the complaint

- findings and supporting explanation
- the outcome (approved/denied/partially approved)
- corrective actions (if any), including payment correction details and timing

8.1 Reconsideration

If dissatisfied, the Customer may request reconsideration by submitting a short written request:

- **Deadline:** within **ten (10) Business Days** of the Determination date
- **Required content:** what part of the Determination is disputed and why; attach any new evidence

Power Financial Services will issue a **Final Determination** on reconsideration within **ten (10) Business Days** of receiving the reconsideration request (or will provide an updated timeline if the matter is complex).

Th Customer has the right to escalate to the **Puerto Rico Energy Bureau (PREB)** for review under Regulation 8543.

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9. External escalation: OIPC and PREB contact information

9.1 Independent Consumer Protection Office (OIPC)

Customers may contact the **Oficina Independiente de Protección al Consumidor (OIPC)** for guidance:

- **Phone:** 787-523-6962
- **Email:** info@oipc.pr.gov
- **Fax:** 787-523-6961
- **Address:** Edificio World Plaza, 268 Avenida Muñoz Rivera, San Juan, PR 00918

9.2 Puerto Rico Energy Bureau (PREB / NEPR)

Customers may contact the **Puerto Rico Energy Bureau**:

- **Phone:** (787) 523-6262
- **Email:** nepr@energia.pr.gov (and the PREB site also lists nepr@jrsp.pr.gov)
- **Address:** World Plaza Building, 268 Muñoz Rivera Ave., San Juan, PR 00918

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10. Right to file with PREB for review under Regulation 8543

Any Customer dissatisfied with Power Financial Services's Determination or Final Determination may file a complaint/claim with the **Puerto Rico Energy Bureau** for review **pursuant to Regulation 8543**.

- Regulation 8543 provides that a claim requesting review of a final decision by an electric service company must be presented within **thirty (30) days** from the date the company issued its final decision.
- Regulation 8543 also states that claims before the Commission are filed via its **electronic filing system** (subject to the Bureau’s instructions).

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11. Recordkeeping and non-retaliation

- Power Financial Services will maintain complaint files (intake, evidence, correspondence, Determinations, payment corrections) for a reasonable retention period consistent with program and regulatory expectations, and will provide them to PREB upon lawful request.
- Power Financial Services will not retaliate or discriminate against any Customer for filing a complaint with Power Financial Services, OIPC, or PREB.

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Appendix A — Customer Complaint Form (Template)

A. Customer Information

- Name:
- Service Address:
- Phone:
- Email:
- Account/Enrollment ID:
- Preferred contact method: Phone / Email / Mail

B. Complaint Type (check all that apply)

Enrollment / eligibility
DR event participation / dispatch / opt-out
Equipment / telemetry / communications
Incentive or compensation amount
Payment timing / missing payment
Termination / cancellation
Customer service / conduct
Privacy / marketing / data disclosure
Other: ___________

C. What happened? (required)

- Date(s) and time(s):
- DR event date/time (if known):
- Description:

D. What outcome do you want? (required)

- Requested resolution:

E. Supporting documents (optional but helpful)
List attachments:

F. Signature (optional)

- Name / Date:

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Appendix B — Reconsideration Request Form

(Template)

- Case number:
- Date of Power Financial Services Determination:
- What part(s) of the Determination are you disputing?
- Why is it wrong (facts and/or documents)?
- What outcome do you want?
- Attach any new evidence: