

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

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**IN RE:** DEMAND RESPONSE PLAN  
REVIEW, IMPLEMENTATION AND  
MONITORING

**CASE NO.:** NEPR-MI-2021-0006

**SUBJECT:** Joint Request for Extension and  
to Reschedule Technical Conference

**JOINT MOTION TO REQUEST EXTENSION TO COMPLY WITH RESOLUTION  
AND ORDER ENTERED ON APRIL 21<sup>ST</sup> 2021 AND TO RESCHEDULE TECHNICAL  
CONFERENCE**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW**, the Puerto Rico Electric Power Authority and LUMA (collectively, “the parties”), through their respective undersigned legal counsel and respectfully state and request the following:

1. On March 24, 2021, the Puerto Rico Power Authority (the “Authority”) filed before the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) a *Motion to Request a Pre-filing Technical Conference Regarding PREPA’s Three Year Demand Response Plan* arguing that in accordance with Regulation 9246,<sup>1</sup> the Authority was directed to file a Three-Year Plan on Demand Response (the “Three Year DR Plan”) and needed further direction from the Energy Bureau to comply.<sup>2</sup>
2. On April 21, 2021, the Energy Bureau issued a *Resolution and Order*<sup>3</sup> directing the Authority, its consultant Guidehouse Inc. (“Guidehouse”) and LUMA,<sup>4</sup> to provide responses to

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<sup>1</sup> Energy Bureau, *Regulation for Demand Response*, No. 9246 (December 21, 2020) (“Regulation 9246”).

<sup>2</sup> The Three-Year DR Plan should identify the proposed Demand Response (DR) programs goals for a three-year period with its associated budget and is subject to the review and approval of the Energy Bureau.

<sup>3</sup> *Resolution and Order* entered on April 21, 2021 (the “Order”).

<sup>4</sup> Luma Energy LLC. and Luma Energy Servco, LLC., collectively known as “LUMA”.

questions included as Attachment A of the Order on or before April 23, 2021, as well as appear for a Technical Conference to be held on April 27, 2021 that will follow an agenda set by the Energy Bureau at Attachment B of the Order.

3. Upon receiving the Order, the Authority and LUMA, along with the Guidehouse consultants, diligently held a meeting where they discussed the scope and requirements of the Order as well as the timeline to comply. Given the technical questions included in the Order, the parties will not be able to comply within the two-day deadline. The parties discussed the need for a brief extension of time to prepare and provide comprehensive responses in compliance with the Bureau's Order. The parties also discussed Attachment A of the Order and assigned responsibilities to address the questions. A work schedule was agreed to ensure due coordination aligned with what the Energy Bureau requested.

4. The Authority and LUMA, as well as the Guidehouse consultants, will work collaboratively in this effort, and have scheduled subsequent meetings to deliver responses to the questions included in Attachment A of the Order by April 30<sup>th</sup> 2021.

5. As the Energy Bureau is aware, the work calendar for May 2021 includes several compliance filings, technical workshops, technical conferences, and compliance and administrative hearings in the various dockets where the Authority and LUMA appear. The Authority and LUMA have identified May 11, 2021, as the earliest available date to appear before the Energy Bureau to discuss the items included in Attachment B of the Order.

**WHEREFORE**, the Authority and LUMA herein request the Energy Bureau to **ACCEPT** this Motion and **GRANT** the requested extension to submit responses to Attachment A of the Order up to and including April 30, 2021, and **RE-SCHEDULE** the Technical Conference for May 11, 2021.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 23rd day of April 2021.

*Counsel for the Puerto Rico Electric Power Authority*

s/ Katuska Bolaños Lugo

Katuska Bolaños Lugo

TSPR 18,888

[kbolaños@diazvaz.law](mailto:kbolaños@diazvaz.law)

s/ Joannely Marrero Cruz

Joannely Marrero Cruz

TSPR 20,014

[jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law)

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.

290 Jesús T. Piñero Ave.

Oriental Tower, Suite 803

San Juan, PR 00918

Tel.: (787) 395-7133

Fax. (787) 497-9664

*Counsel for LUMA Energy LLC as Management Co. and LUMA Energy ServCo LLC*

/s/ MARGARITA MERCADO  
ECHEGARAY

Margarita Mercado Echegaray

DLA Piper (Puerto Rico) LLC

PR Bar No. 16,266

Suite 401

500 Calle de la Tanca

San Juan, PR 00901-1969

787-945-9101

[margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com)