

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

NEPR Received: May 12, 2021 2:31 PM
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IN RE: REVIEW OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY'S SYSTEM
REMEDATION PLAN

CASE NO. NEPR-MI-2020-0019

**SUBJECT: Request for Clarification of Agenda for
Technical Conference.**

**REQUEST FOR CLARIFICATION OF AGENDA FOR TECHNICAL
CONFERENCE**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On April 23, 2021, this honorable Puerto Rico Energy Bureau (“Bureau”) issued a Resolution and Order that, among others, scheduled a technical conference for May 14th and May 17th, 2021 (“April 23rd Order”), to discuss LUMA’s System Remediation Plan (“SRP”).

2. On May 10, 2021, this honorable Bureau issued a Resolution and Order with an agenda of the subject-matters to be discussed in the technical conference (“May 10th Resolution and Order”).

3. The May 10th Resolution and Order also directed that LUMA representatives involved in preparing the SRP should participate in the technical conference to answer questions on the topics that the Bureau included in the agenda.

4. To ensure that LUMA representatives are duly prepared and able to answer question on the proposed SRP and in order to fully understand the subject-matters included in the agenda issued in the May 10th Resolution and Order and their relationship with LUMA’s proposed SRP, LUMA hereby requests clarification of the agenda.

5. The second subject-matter slated to be discussed during the afternoon of May 14th is “load prioritization.” It is respectfully requested that the Bureau provide more specificity on the scope of the topics that the Bureau and its consultants will address within this subject-matter and/or that the Bureau further define the term “load prioritization.”

6. LUMA understands the public policy directives of Acts 57 and 17 to improve and modernize the electric power grid to make it robust, resilient and stable which includes, among others, resiliency of critical load facilities and the importance of preventing overload. Several of LUMA’s SRP programs further those public policy directives and will remediate systems and facilities that supply critical loads. *See e.g.*, Appendix B, SRP at page 326. However, LUMA’s SRP does not employ the term “load prioritization.” Hence the importance of obtaining clarification on the subject-matter included as the second topic for the afternoon session of the May 14th technical conference.

7. LUMA looks forward to its participation in the technical conference in furtherance of this Bureau’s consideration and approval of the proposed SRP. It is respectfully submitted that the clarification requested herein will aid discussions in the upcoming technical conference.

8. It is respectfully informed that LUMA’s Recovery and Transformation Framework and its Initial Budgets incorporate discussions and initiatives on renewable portfolio standards. *See* Initial Budgets filing of February 24, 2021, at pages 3, 25 (executive summary) and 362 (Renewables, Integration, Minigrids & Generation). LUMA did not categorize this as a high-risk activity. Thus, it is not included as part of the SRP programs.

WHEREFORE, LUMA respectfully requests that this honorable Bureau **take notice** of the aforementioned and **issue** the clarification requested in this motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of May 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that notice will be sent to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law.



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