

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

NEPR Received: May 4, 2021 8:58 PM

IN RE: REVIEW OF T&D'S
OPERATORS SYSTEM
OPERATION PRINCIPLES

CASE NO. CEPR-MI-2021-0001

**SUBJECT: Urgent Request for Extension of Time to
File Presentation for Technical Conference.**

**URGENT REQUEST FOR EXTENSION OF TIME TO FILE LUMA'S
PRESENTATION 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 27, 2021, this honorable Puerto Rico Energy Bureau (“Bureau”) issued a Resolution and Order that sets a procedural calendar in this proceeding (“April 27th Order”).
2. Among others, in the April 27th Order this Bureau directed that LUMA file by May 5, 2021, the presentation to be offered during the virtual technical conference scheduled in this proceeding.
3. LUMA has been diligently working on a fulsome Power Point™ presentation to aid this Energy Bureau in its analysis and approval of the System Operation Principles (“SOP”) and that will be a key resource for the public and interested stakeholders. However, the eight days granted by this honorable Energy Bureau have proven insufficient for LUMA to draft, review and conclude its presentation for the technical conference.
4. During the past weeks, LUMA has diligently worked on several regulatory filings in proceedings before this Bureau. Those filings include:

- a. Two motions in compliance with this Bureau’s resolutions and orders on LUMA’s requests for confidential designations of the Initial Budgets and the responses to requests for information issued by the Bureau on Initial Budgets in Case No. NEPR-MI-2021-0004 (“Initial Budgets Proceeding”) (both filed on April 23, 2021);
- b. Motion in compliance with this Bureau’s resolution and order on LUMA’s requests for confidential designations of the System Remediation Plan (“SRP”), submitted in Case No. NEPR-MI-2020-0019 (filed on April 27, 2021);
- c. Memorandum of Law in Support of Request for Confidential Designations of Responses to Requests for Information issued by the Bureau on the SRP, Case No. NEPR-MI-2020-0019 (filed on April 26, 2021);
- d. Submission of the Puerto Rico Electric Power Authority’s Generation Budget, Initial Budgets Proceeding (filed on April 22, 2021);
- e. Motion for clarification on LUMA’s Initial Budgets and Shared Services submitted in Initial Budgets Proceeding (filed on April 26, 2021);
- f. Responses to Questions of Stakeholders in the optimization proceeding, Case No. NEPR-MI-2020-0016 (filed on April 21, 2021);
- g. Submission of Summary of Initial Budgets in Spanish, Initial Budgets Proceeding (filed on April 28, 2021);
- h. Submission of Summary of SRP in Spanish, Case No. NEPR-MI-2020-0019 (filed on April 28, 2021);
- i. Motion for partial reconsideration of Bureau Resolution and Order issued on April 8, 2021 on PREPA’s performance baselines, submitting information on

the results of J.D. Power Surveys and requesting clarifications, Case No. NEPR-MI-2019-0007 (filed on April 28, 2021);

- j. Presentation for the Technical Conferences on Initial Budgets, Initial Budgets Proceeding (filed on April 30, 2021);
- k. Motion submitting PREPA's presentation on Generation Budget, Initial Budgets Proceeding (filed on April 30, 2021);
- l. Submission of Summary of SOP in Spanish (filed on April 30, 2021);
- m. Joint Submission with the Puerto Rico Electric Power Authority with answers to questions issued by this Bureau in the Demand Response proceeding, Case No. NEPR-MI-2021-001 (filed on April 30, 2021); and
- n. Motion in Compliance with Order and Submitting Revised Public Version on LUMA's Response to Request for Information Number 2, Initial Budgets Proceeding (filed on May 3, 2021).

5. Importantly, as this honorable Bureau is aware, at least eighteen (18) LUMA representatives appeared for the full day on May 3rd and May 4th 2021 for the Technical Conference on Initial Budgets to provide testimonies and answer questions from Commissioners and Bureau consultants.

6. Several of the LUMA representatives that have been providing testimonies in the Initial Budgets Proceedings are also tasked with drafting the presentation to be offered on May 10, 2021, in the Technical Conference scheduled in this case. They have been working simultaneously to conclude the presentation by the deadline. Until today, the LUMA representatives understood in good faith that the presentation would be ready by May 5th. However, preparations and active participations in the Initial Budgets Proceeding have required more time and effort than

anticipated, with the result that it is not possible for them to responsibly conclude the SOP presentation for submission on May 5, 2021.

7. LUMA is filing this request at the first available opportunity, after concluding its participation in the second day of the Technical Conference on Initial Budgets, which is when the LUMA team in good faith concluded that the time initially granted by this Bureau to file the SOP presentation would not be sufficient.

8. It bears noting that the LUMA representatives in charge of finalizing the SOP presentation will be participating all day tomorrow in the third and final session of the Technical Conference on Initial Budgets. It is respectfully submitted that they require the opportunity of finalizing the SOP presentation on Thursday, May 6, 2021.

9. LUMA respectfully requests a brief extension of time until Friday, **May 7, 2021 at 3:00 pm**, to file for the record, the presentation to be offered during the technical conference scheduled in this proceeding.

10. This brief extension of time is sought in good faith without intent to delay proceedings. It is respectfully submitted that the requested extension will serve to ensure that the presentation to be offered by LUMA and its representatives addresses fully the technical subjects to be discussed and analyzed during the technical conference.

11. LUMA remains committed to comply with the orders issued by this honorable Bureau en route to reaching the goal of commencing operations by June 1st 2021, to deliver safe, reliable, resilient, cost-efficient and customer-centric electric power services in Puerto Rico to benefit public interests and in compliance with energy public policy.

WHEREFORE, LUMA respectfully requests that this Bureau **take notice** of the aforementioned, and **grant** LUMA the requested brief extension of time until May 7, 2021 at 3:00

pm, to file for the public record the presentation to be offered during the technical conference in this proceeding.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of May 2021.

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



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA NÚM. 16,266
margarita.mercado@us.dlapiper.com