

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

NEPR

Received:

May 29, 2021

1:51 PM

IN RE: REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY'S DATA
SECURITY PLAN

CASE NO. NEPR-MI-2020-0017

SUBJECT: Submission of Redacted Version of
LUMA's Data Security Plan.

**MOTION SUBMITTING REDACTED VERSION OF LUMA'S DATA SECURITY
PLAN**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo")¹, and **LUMA Energy ServCo, LLC** ("ServCo")², (jointly referred to as "LUMA"), through the undersigned counsel and respectfully avers and prays:

1. This honorable Puerto Rico Energy Bureau ("Energy Bureau") initiated this confidential proceeding through a Resolution and Order dated December 31, 2020 ("December 31st Resolution and Order"), to evaluate the Data Security Plan that LUMA shall develop pursuant to Section 4.2(h) of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020 (the "OMA").

2. At page 3 of the December 31st Resolution and Order, the Bureau stated the following on confidentiality: "Given the nature of the information to be handled under the instant case, all proceedings and filing[s] are deemed confidential unless the Energy Bureau determines otherwise."

¹ Register No. 439372.

² Register No. 439373.

3. Today, LUMA submitted before this honorable Energy Bureau the Data Security Plan that it developed pursuant to Section 4.2(h) of the OMA. *See* OMA, Section 4.2 (h) (providing that, prior to Commencement Date, LUMA shall develop and provide the P3 Authority and this Bureau for their information, a plan meeting Contract Standards that outlines the procedures and actions necessary for maintaining data security, cyber security and information security relating to the T&D System after Commencement Date (the “Data Security Plan”) “which shall become effective on the [...] Commencement Date . . .”).

4. LUMA submitted the Data Security Plan as Exhibit 1 to a procedural motion entitled “Motion Submitting LUMA’s Data Security Plan” (“Motion Submitting Data Security Plan”). The Motion Submitting Data Security Plan discusses the hallmarks of the Data Security Plan and explains how the Data Security Plan complies with and furthers the public policy mandates of Act 17-2019 on cybersecurity, data and information security.

5. Because the Motion Submitting Data Security Plan references details of the Data Security Plan, which this Bureau has treated confidentially, LUMA submitted it under seal of confidentiality and hereby requests that both the Motion Submitting Data Security Plan and the Data Security Plan be kept confidentially in accordance with the December 31st Resolution and Order.

6. With this Motion, LUMA is submitting a public redacted version of the Data Security Plan.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, and **accept and maintain** the Motion Submitting Data Security Plan and the Data Security Plan under seal of confidentiality in alignment with the December 31st Resolution and Order that treats this proceeding as confidential.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th 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 Katiuska 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

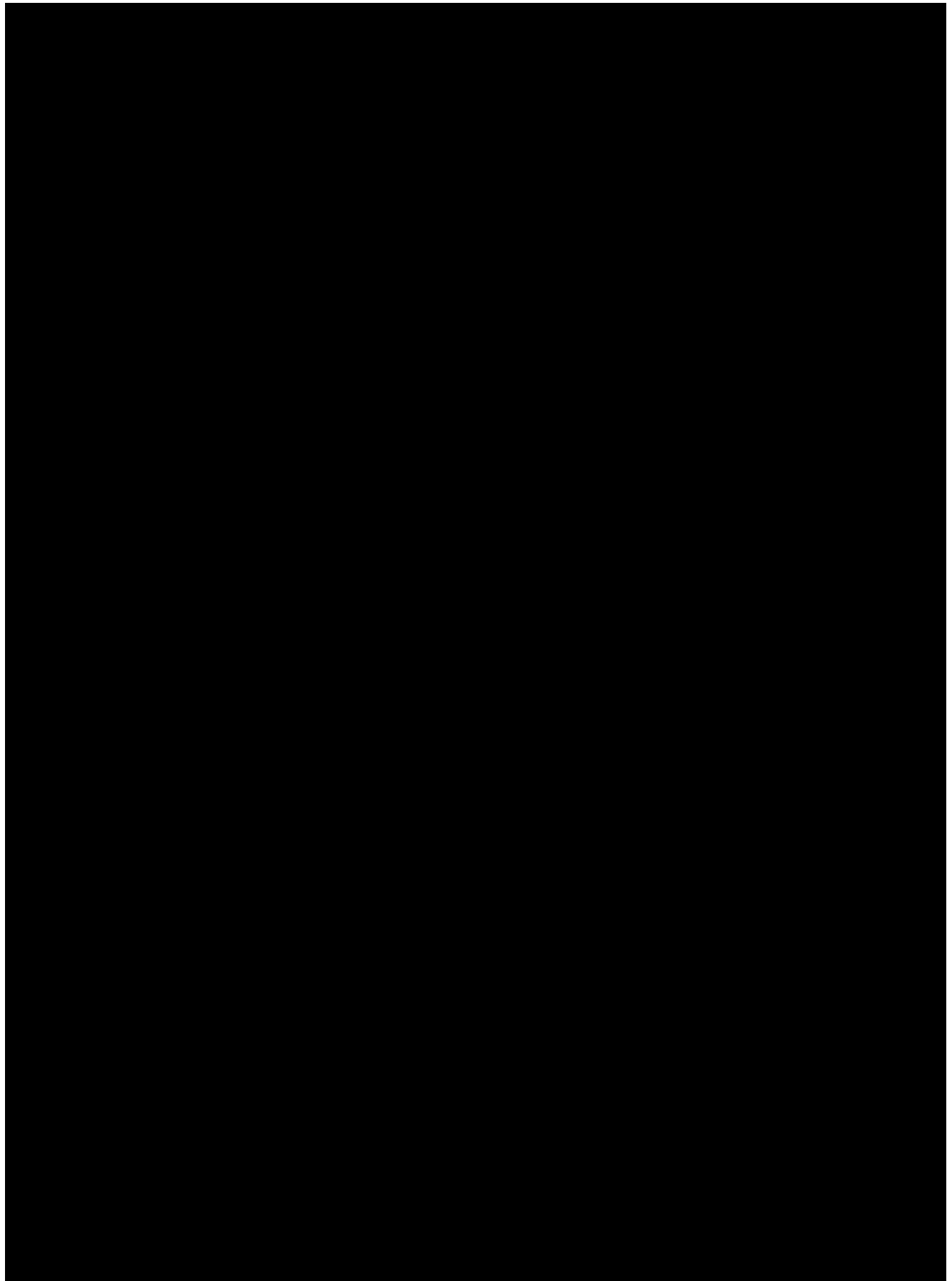
Exhibit 1, Redacted Public Version of LUMA's Data Security Plan

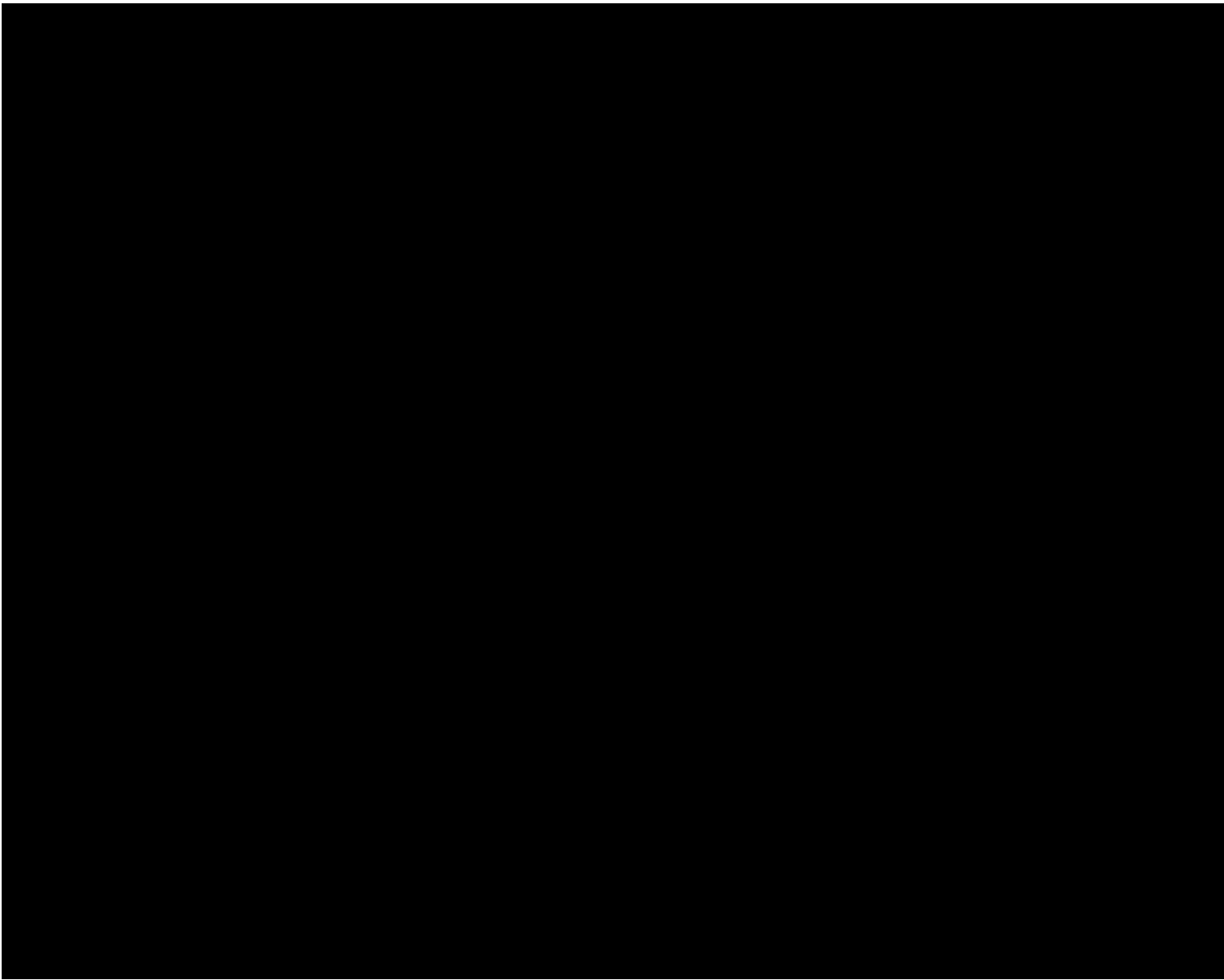


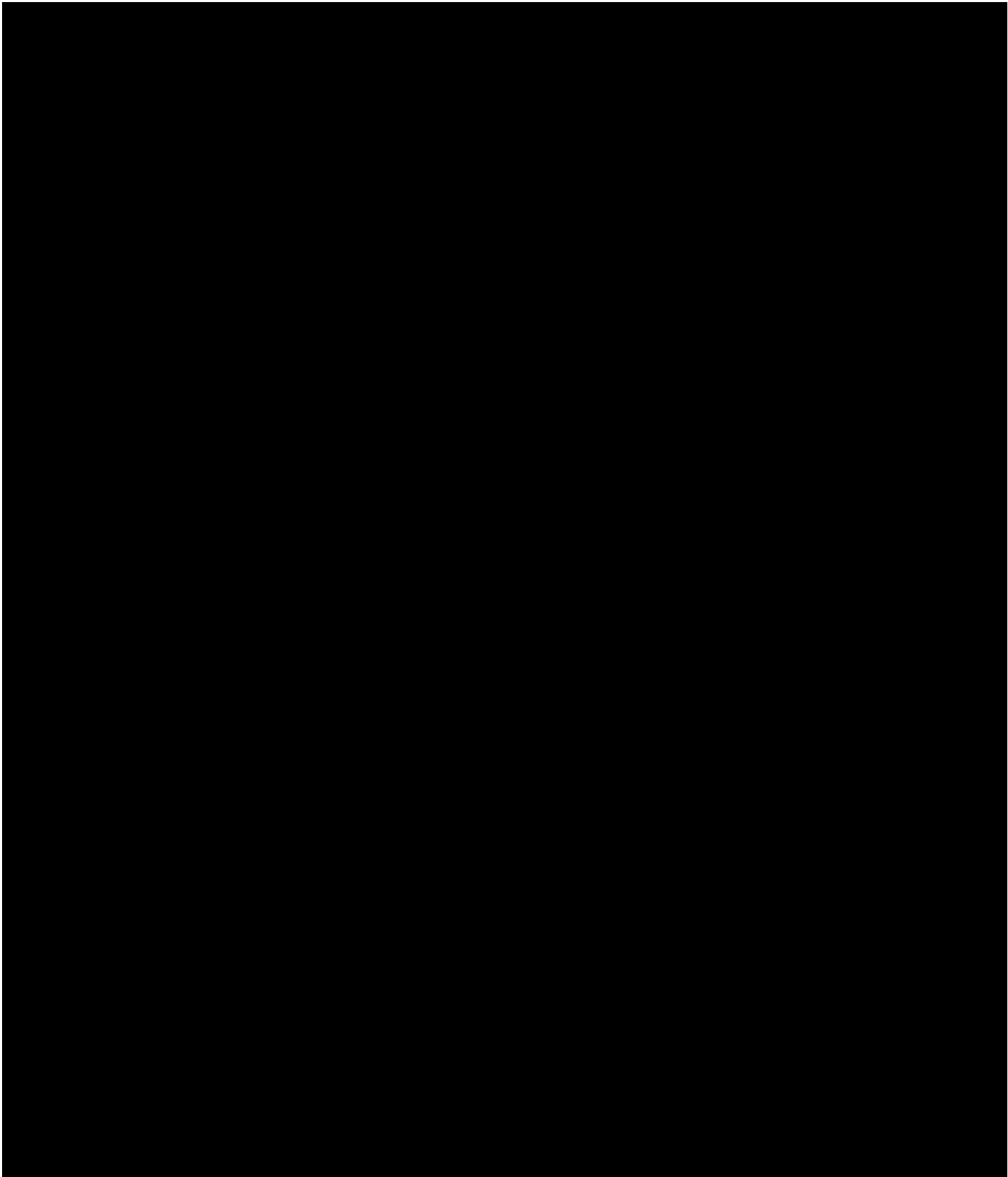
LUMA

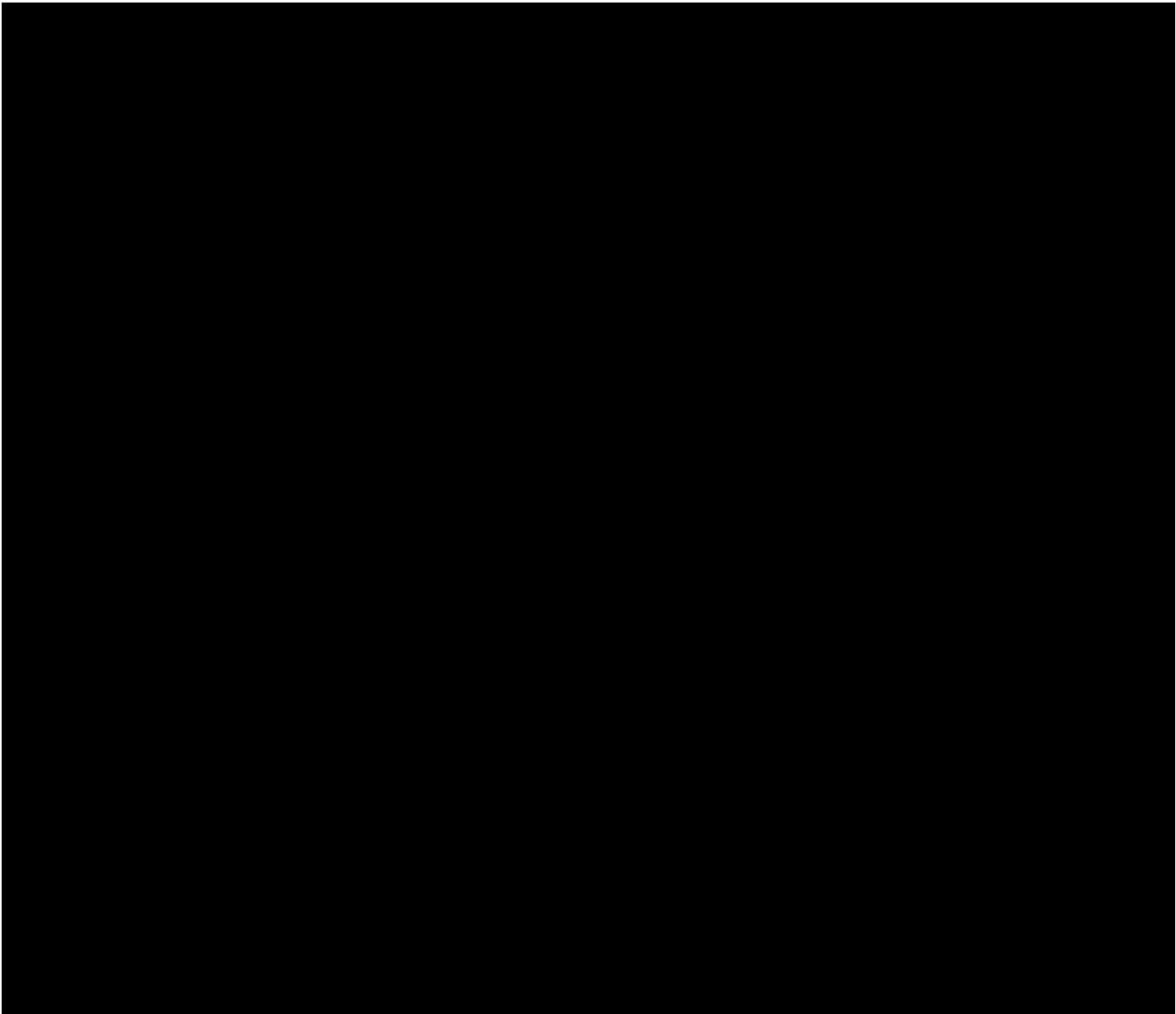
Cybersecurity Plan

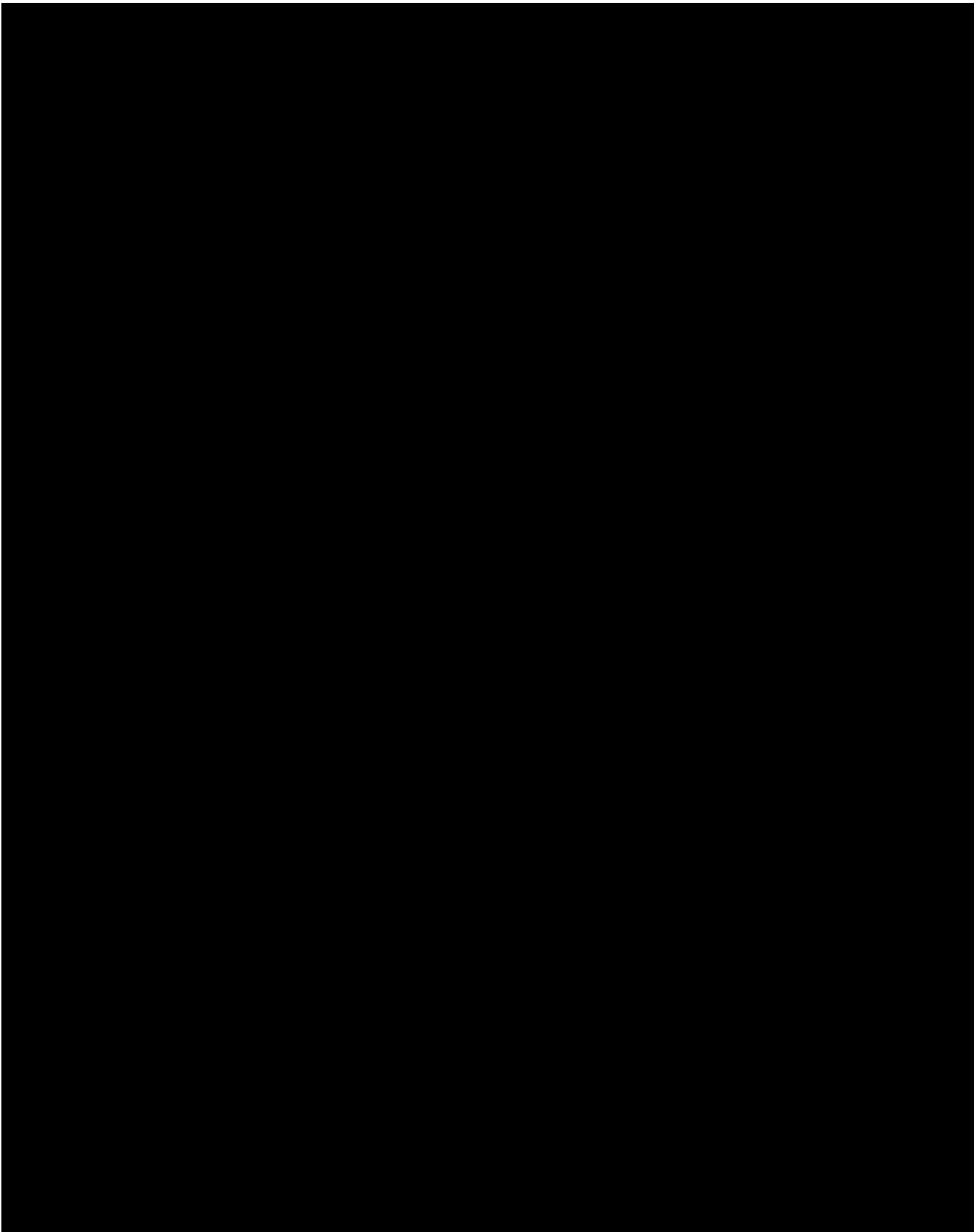
Transition and Commencement
Plan for Security & Compliance

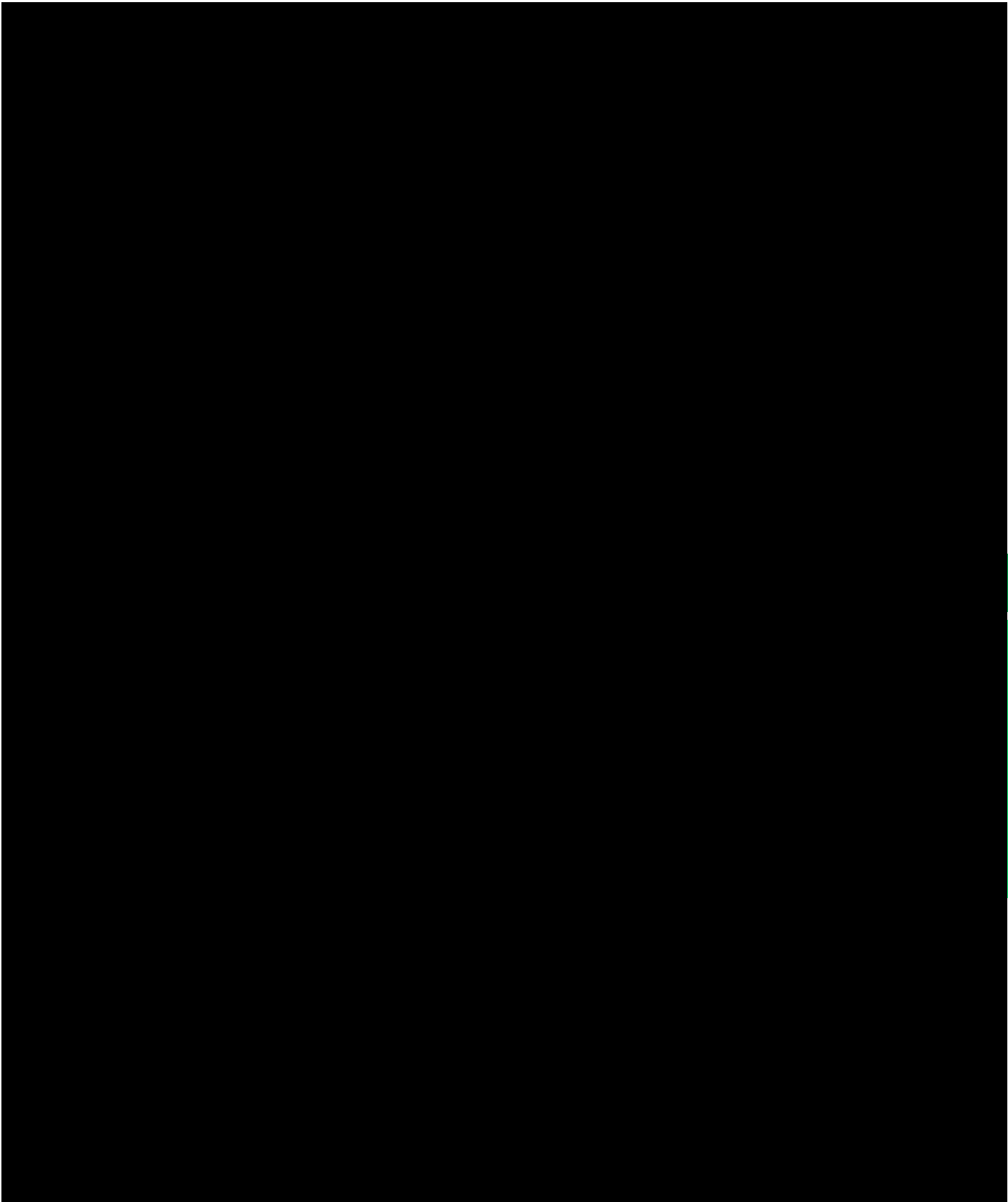


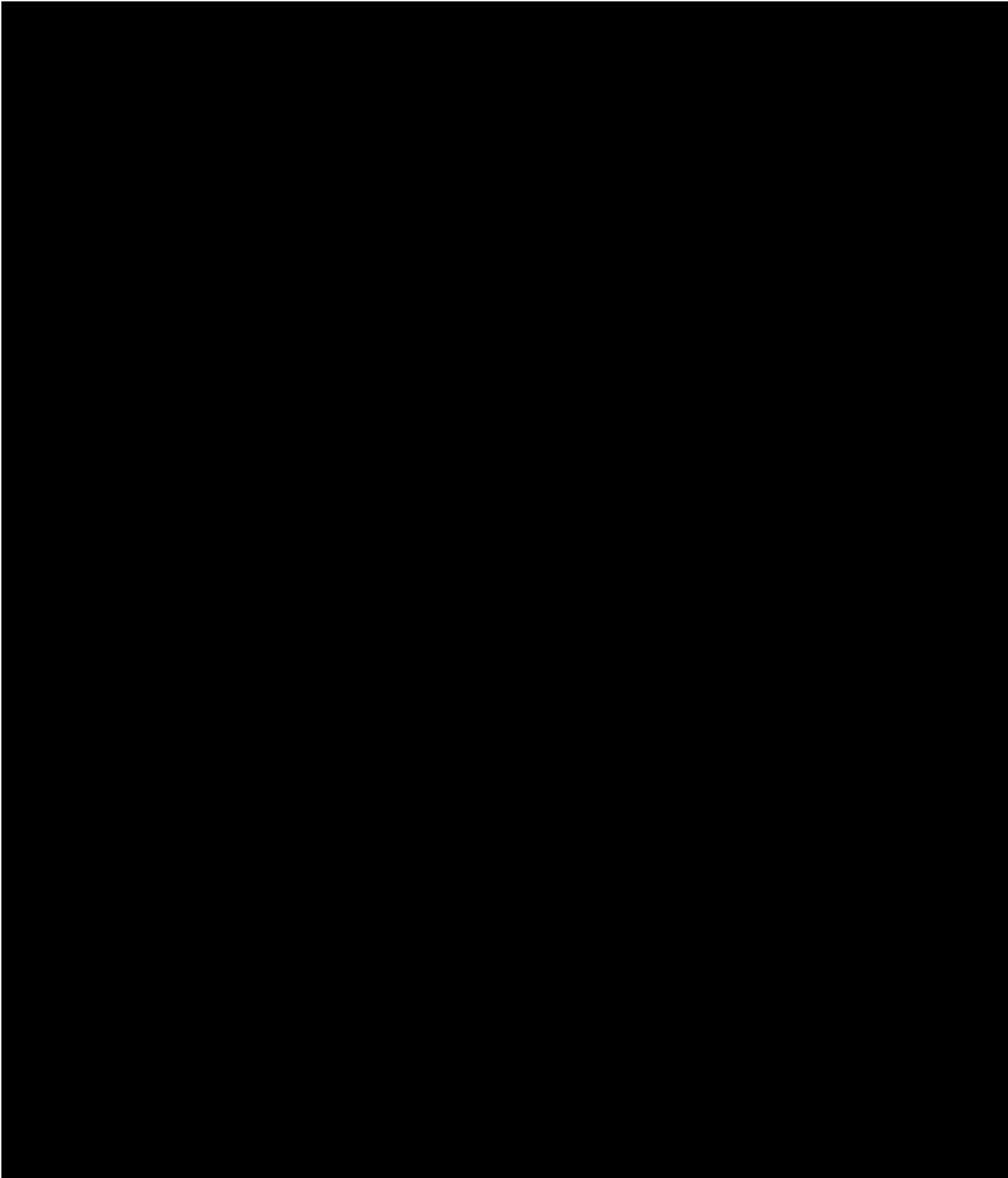


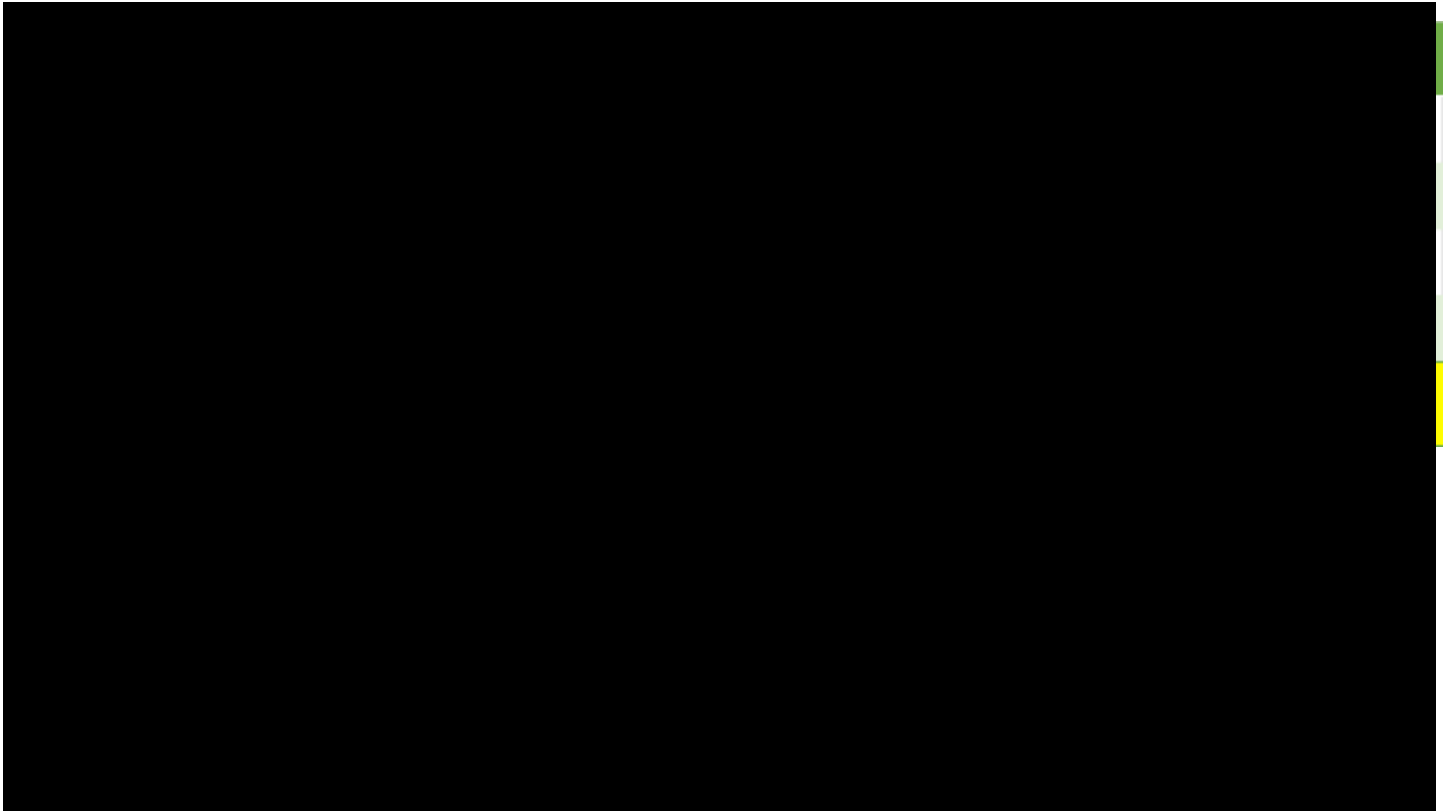


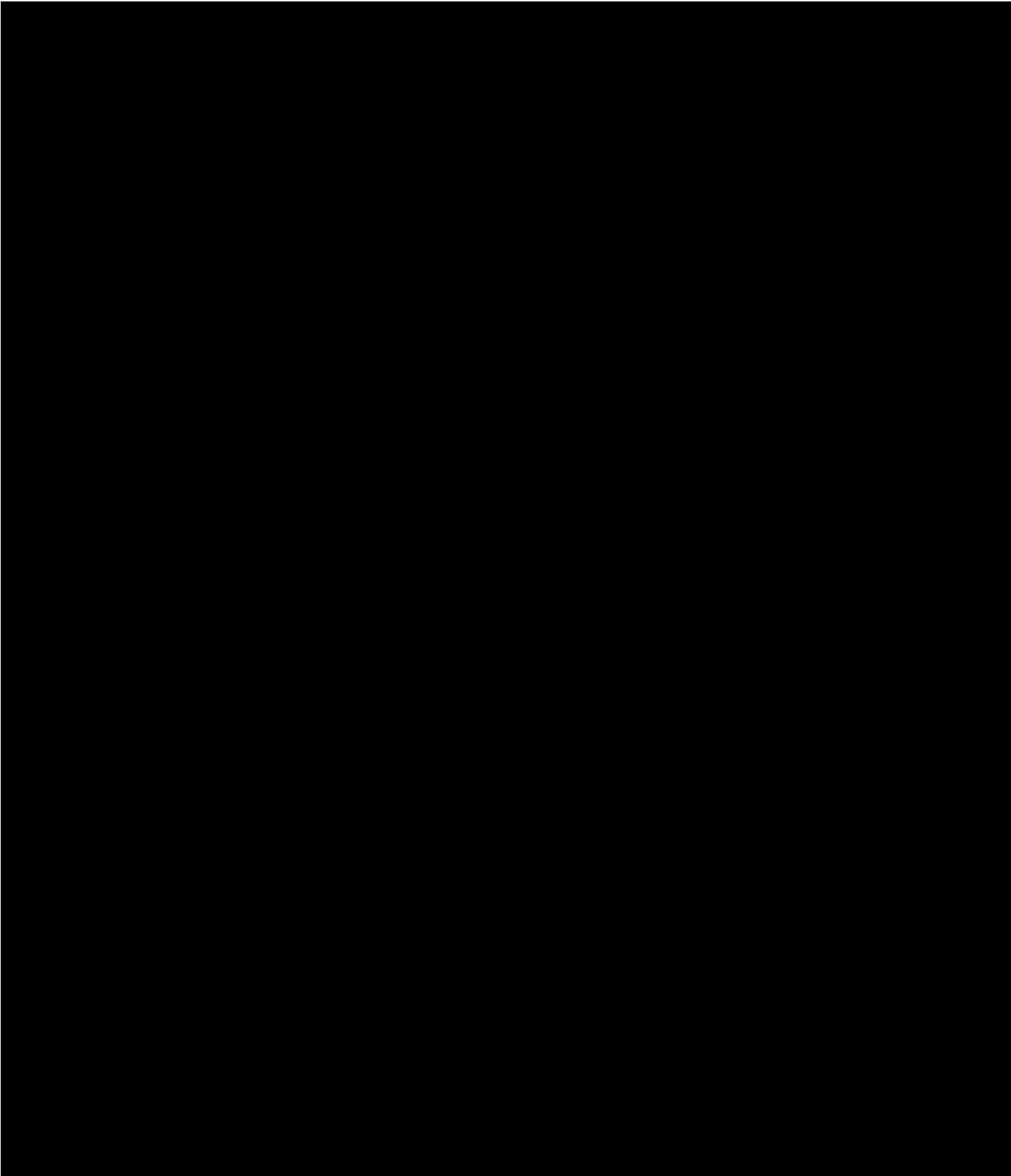


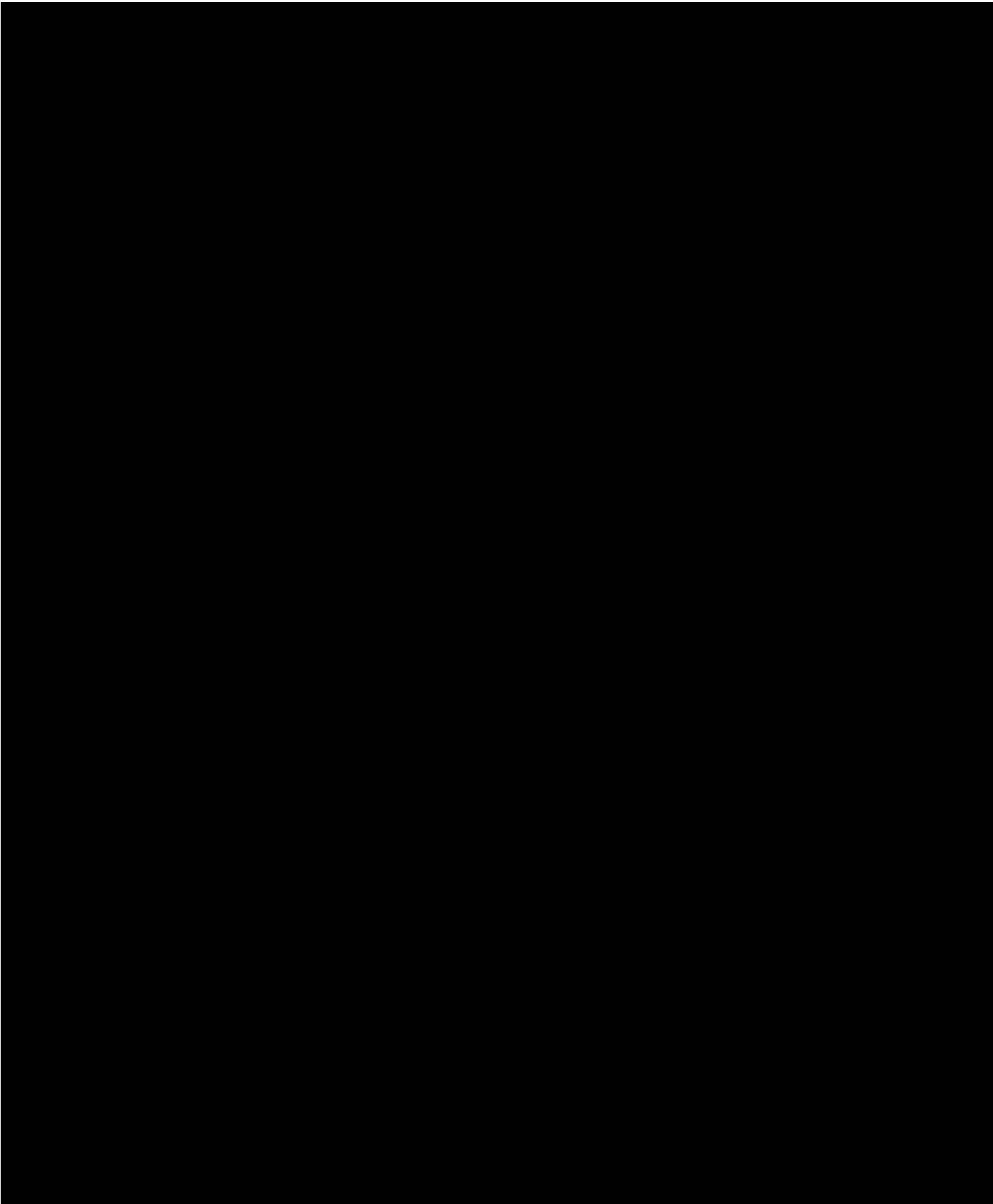


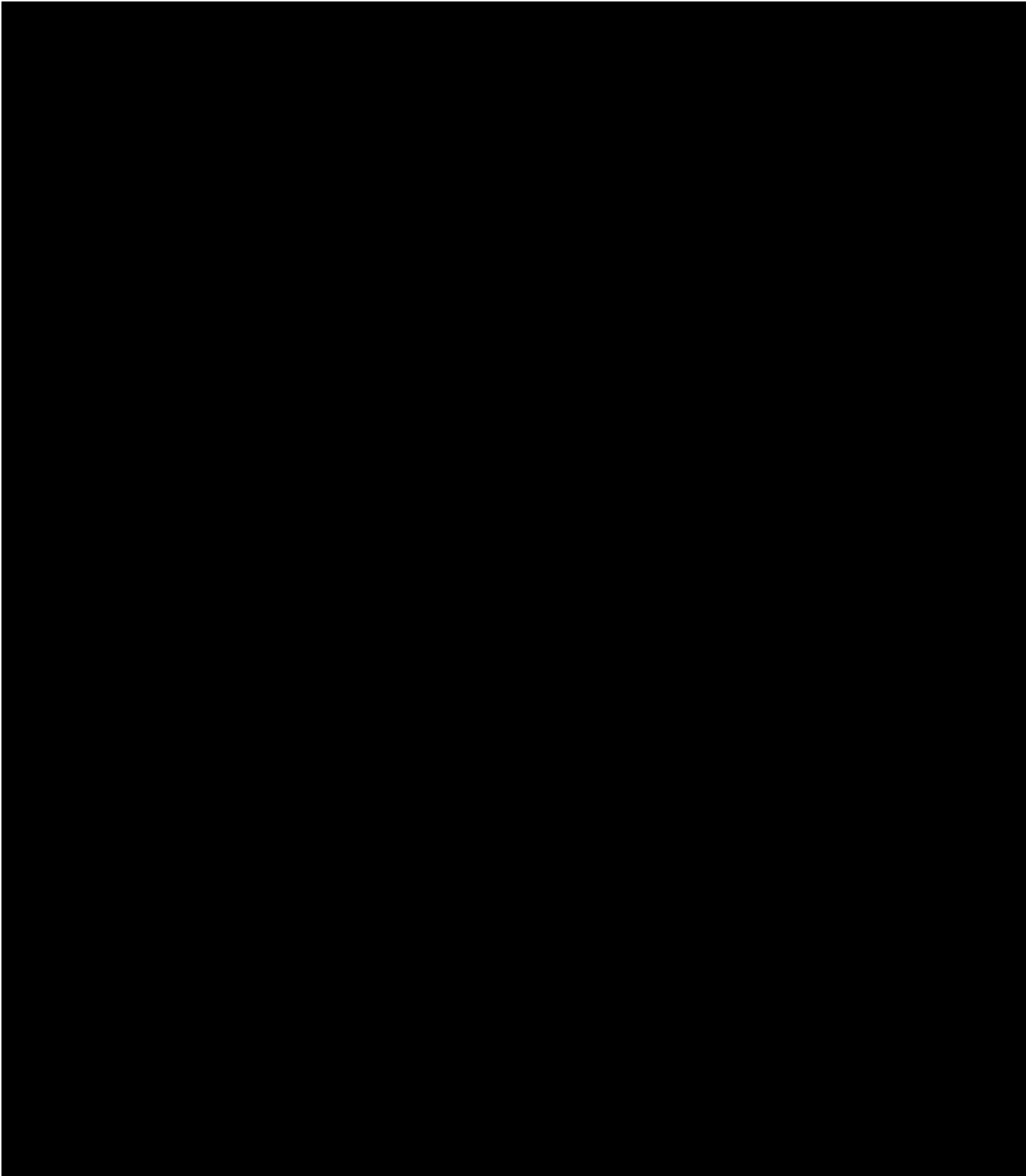


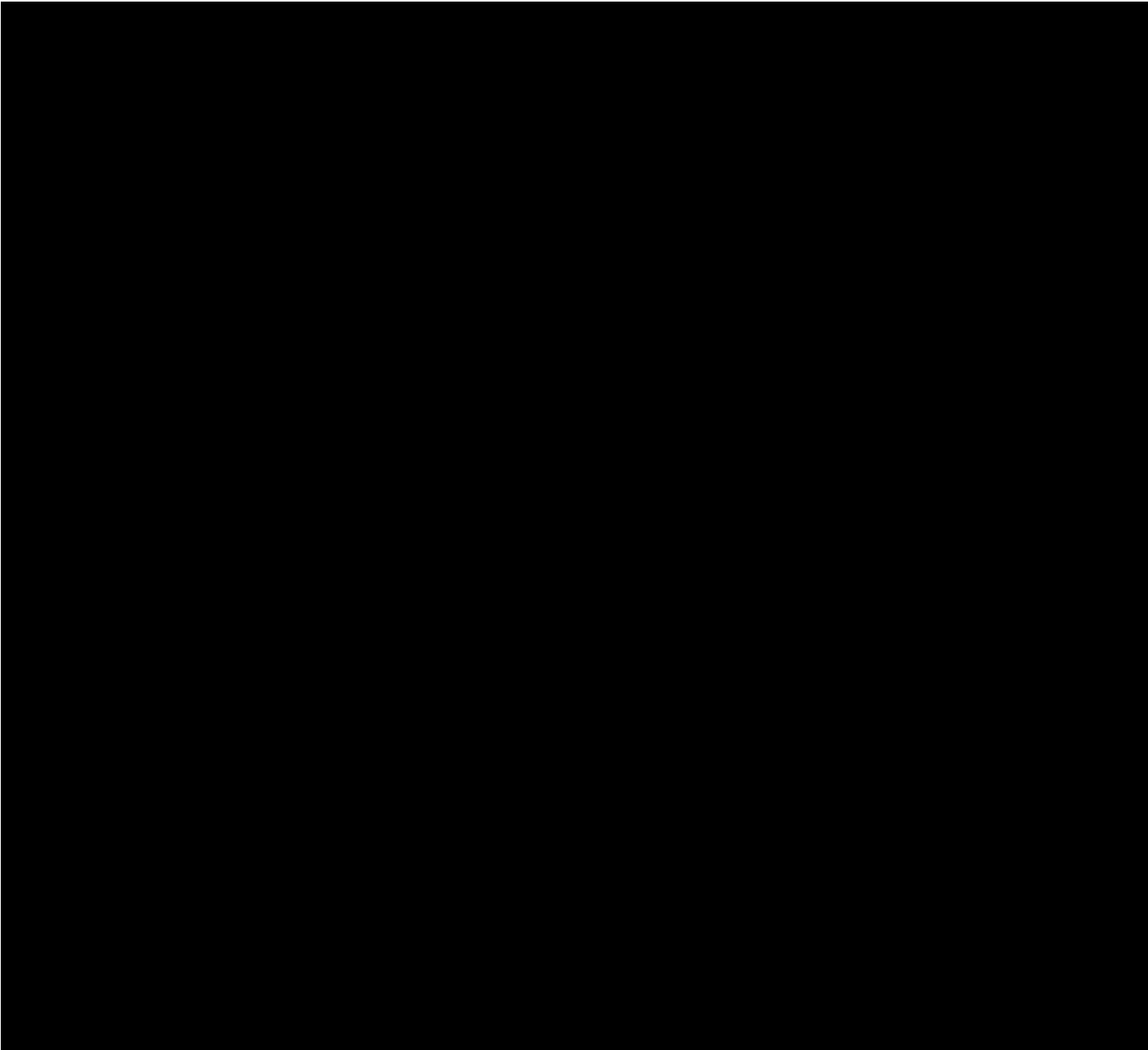


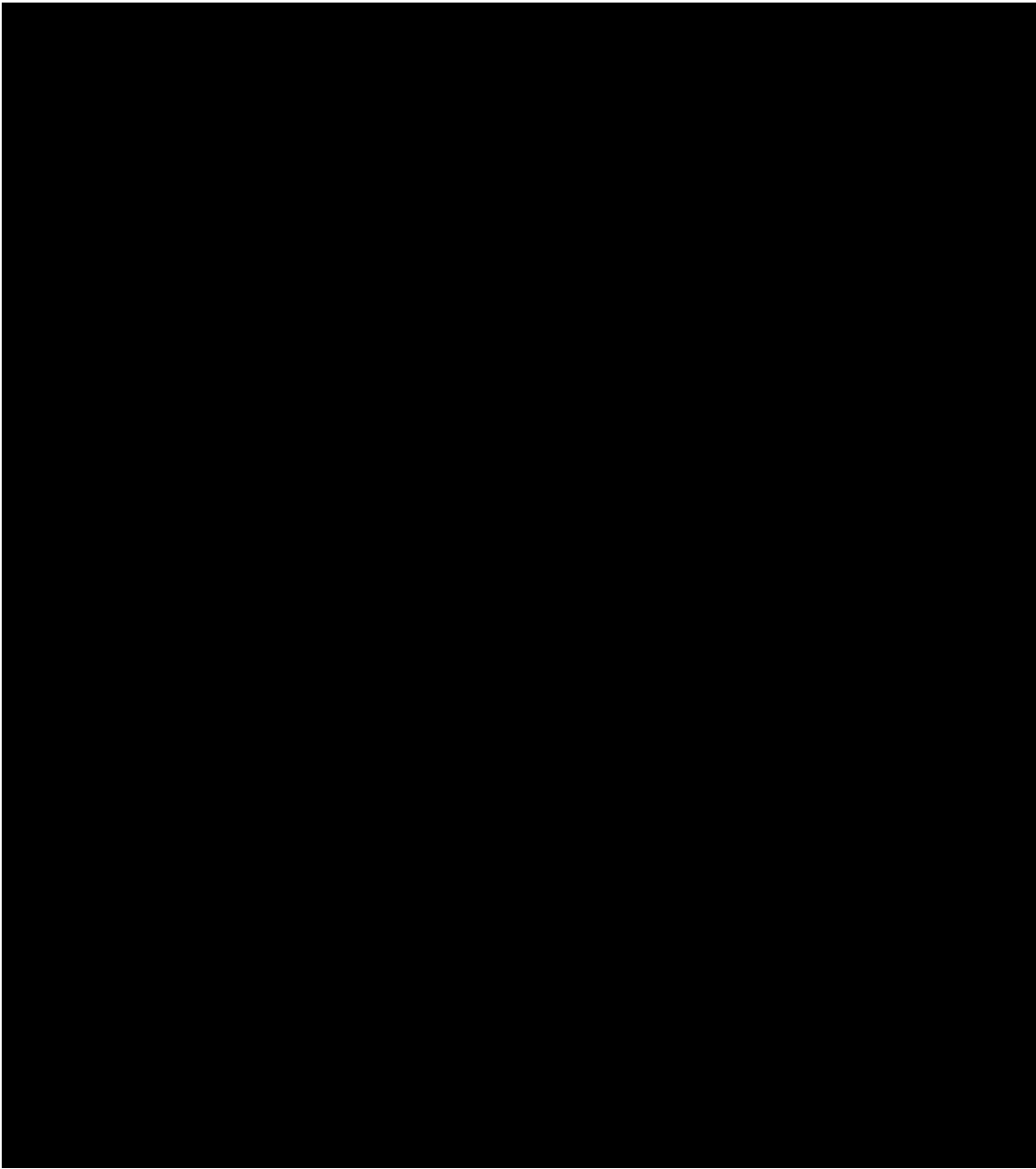


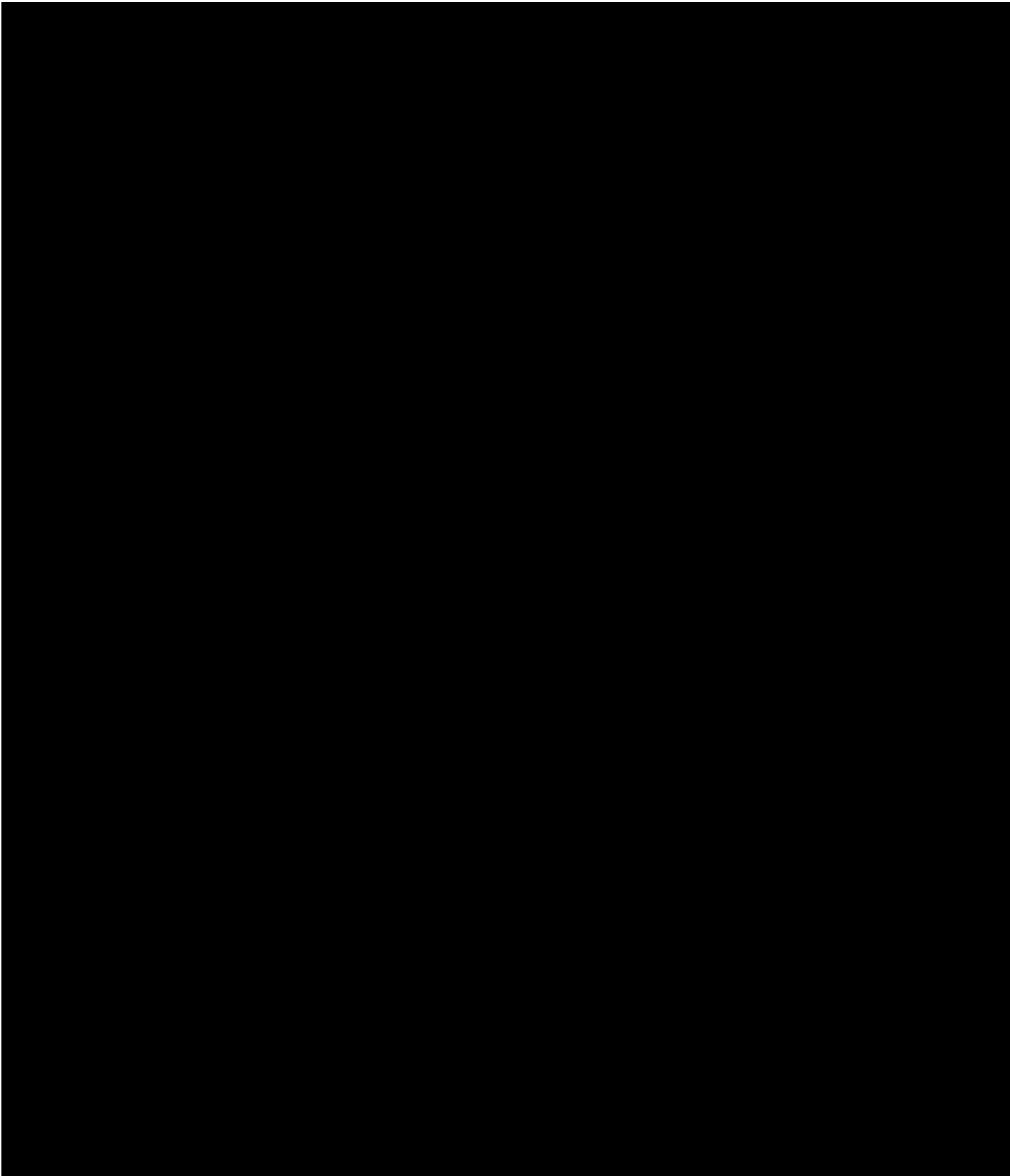


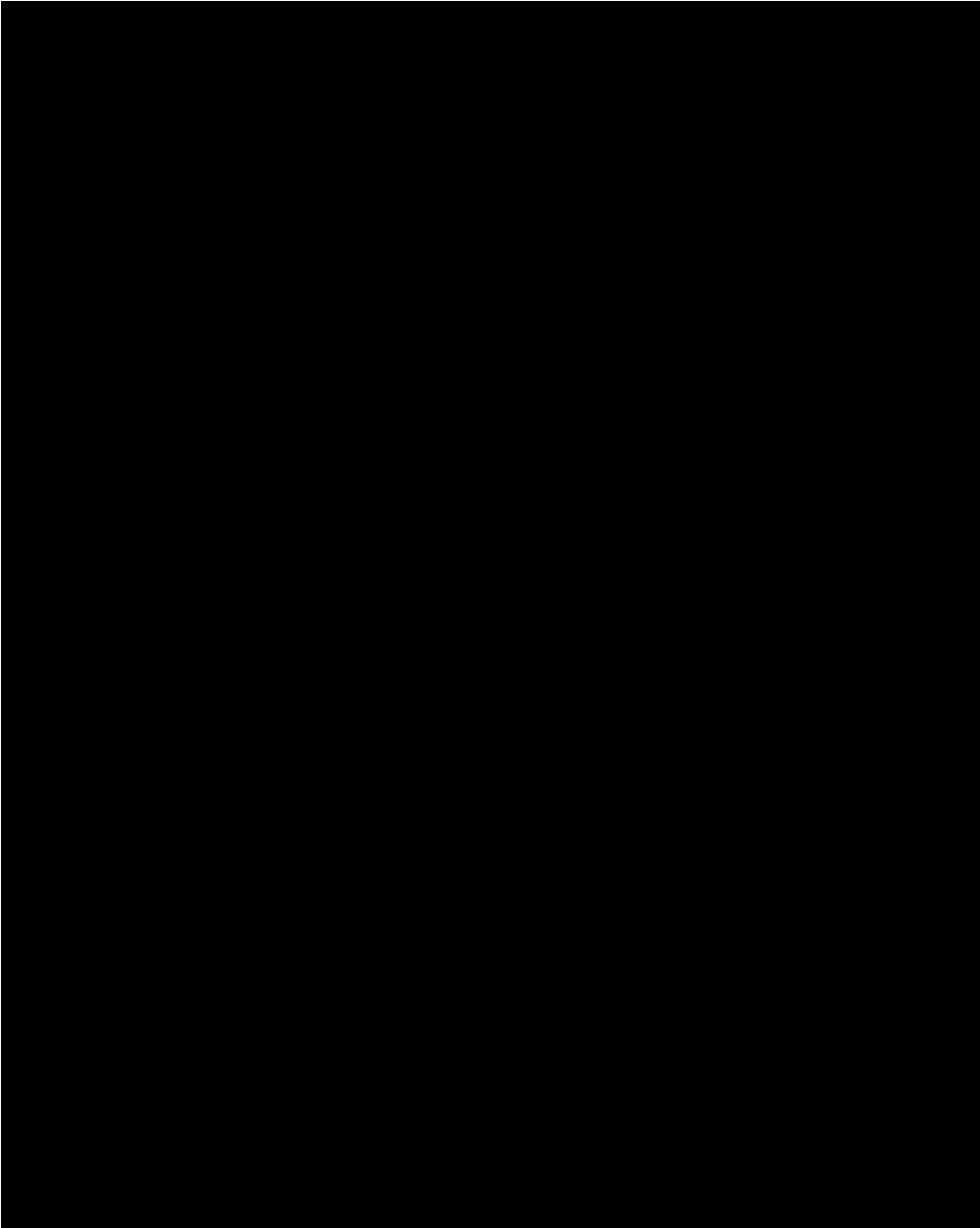




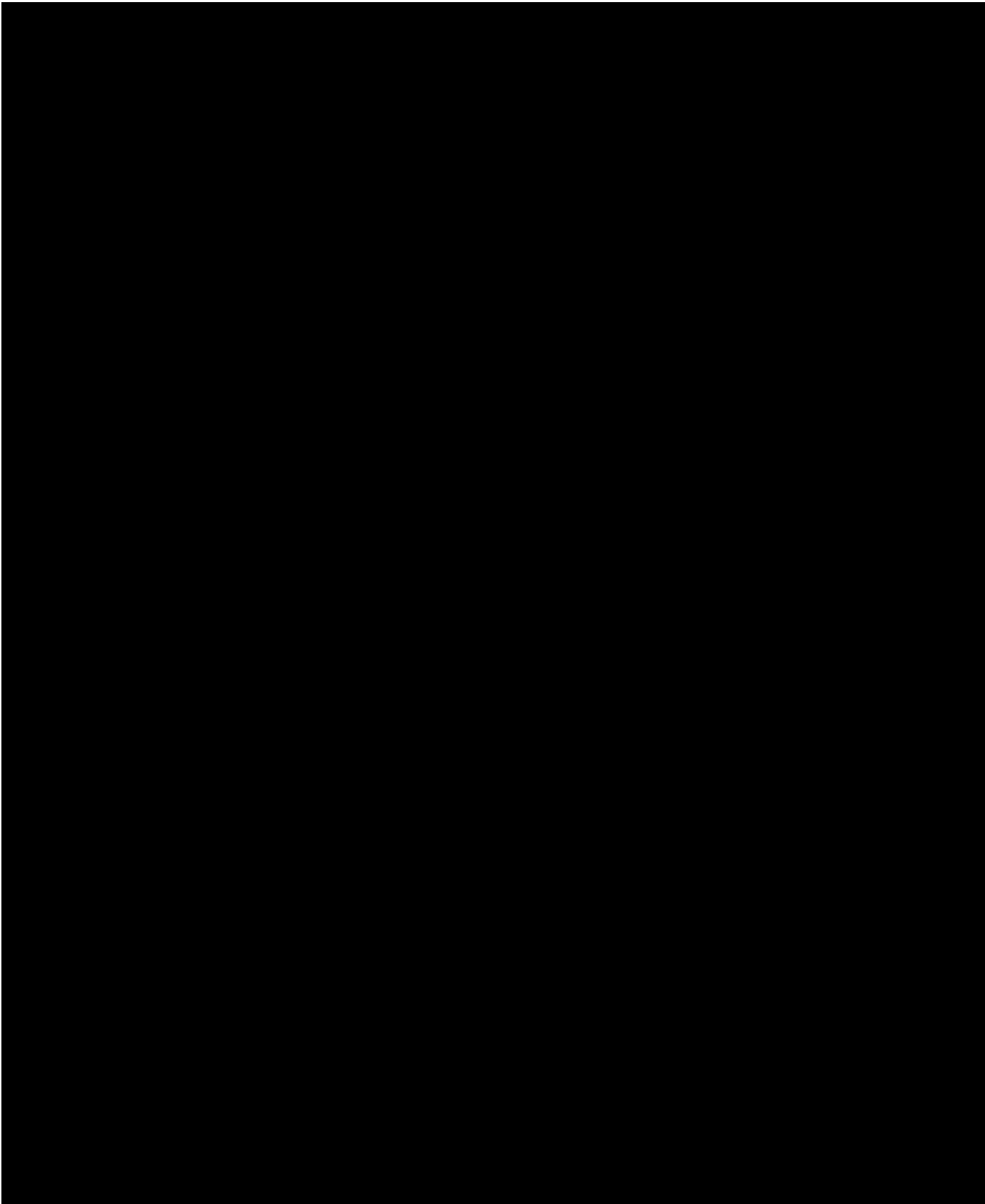


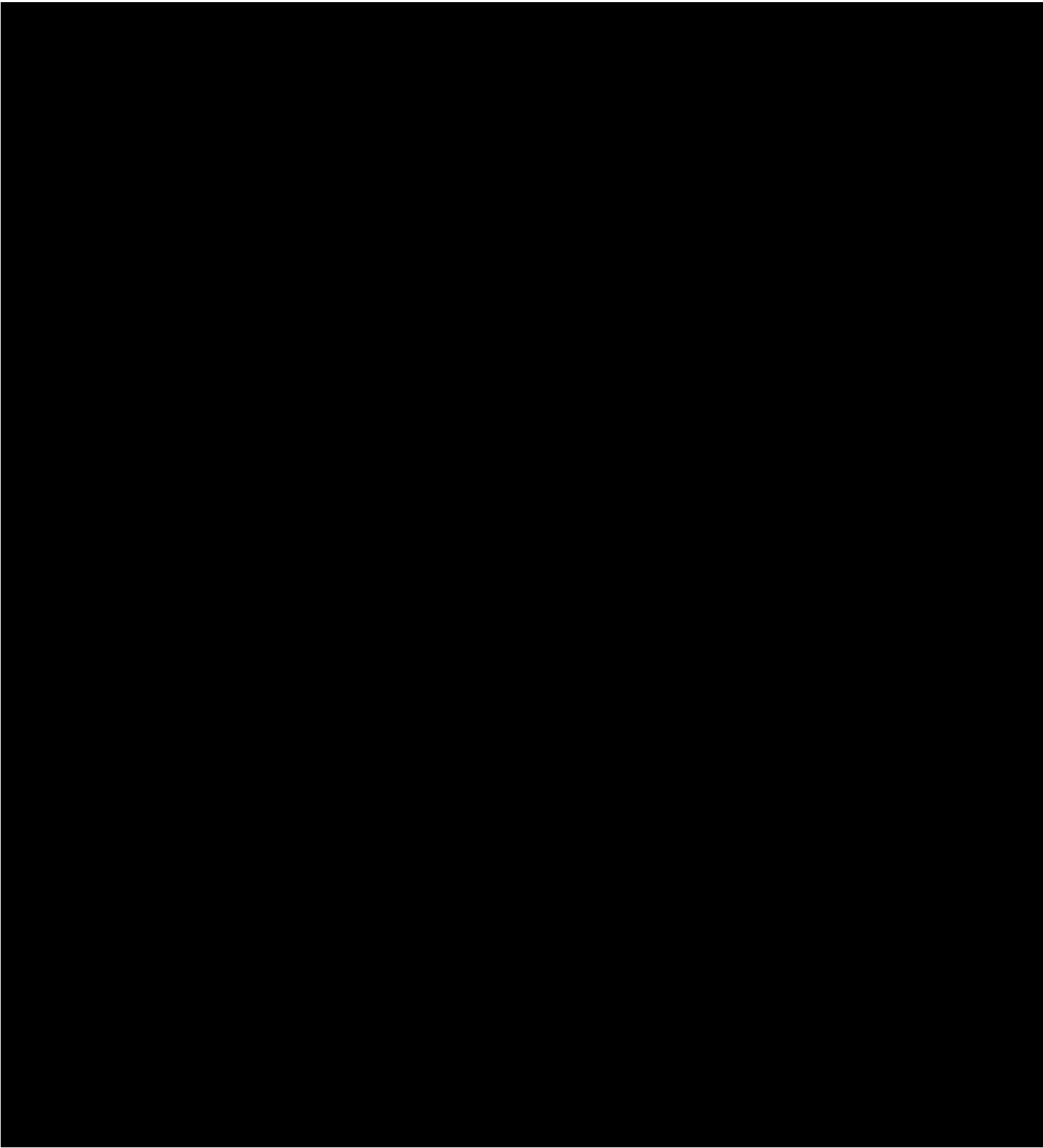


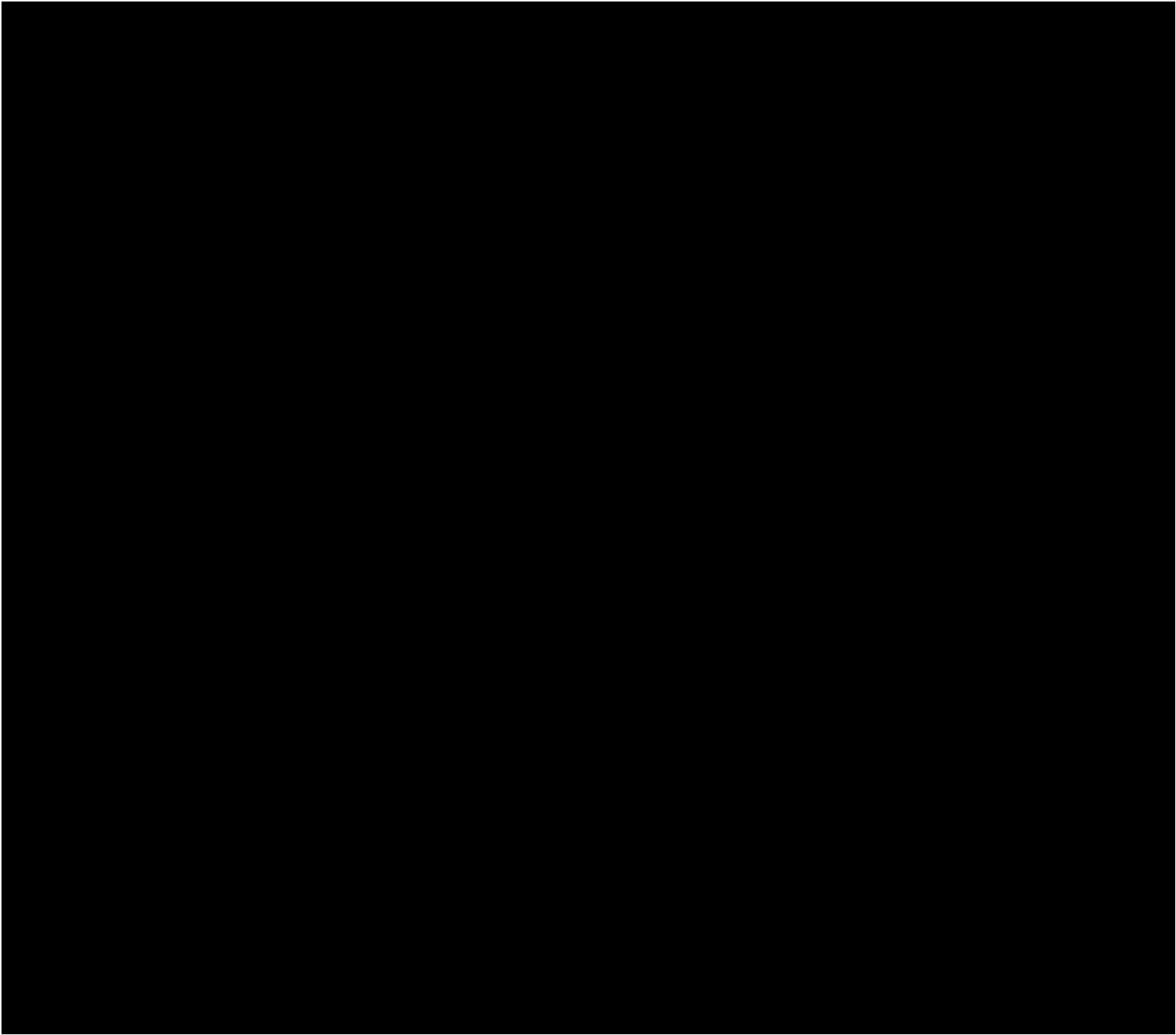


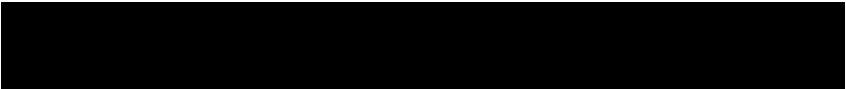
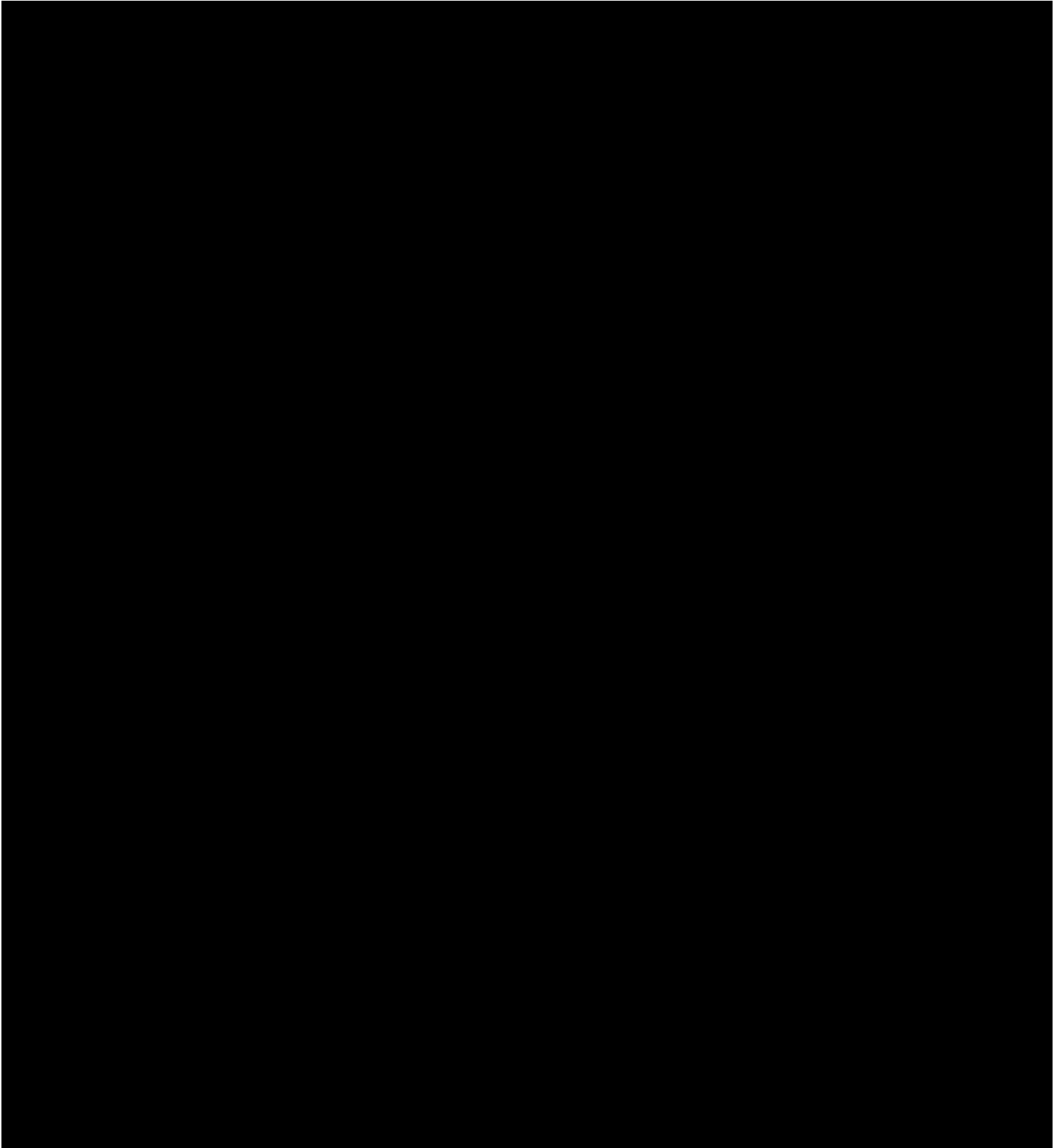


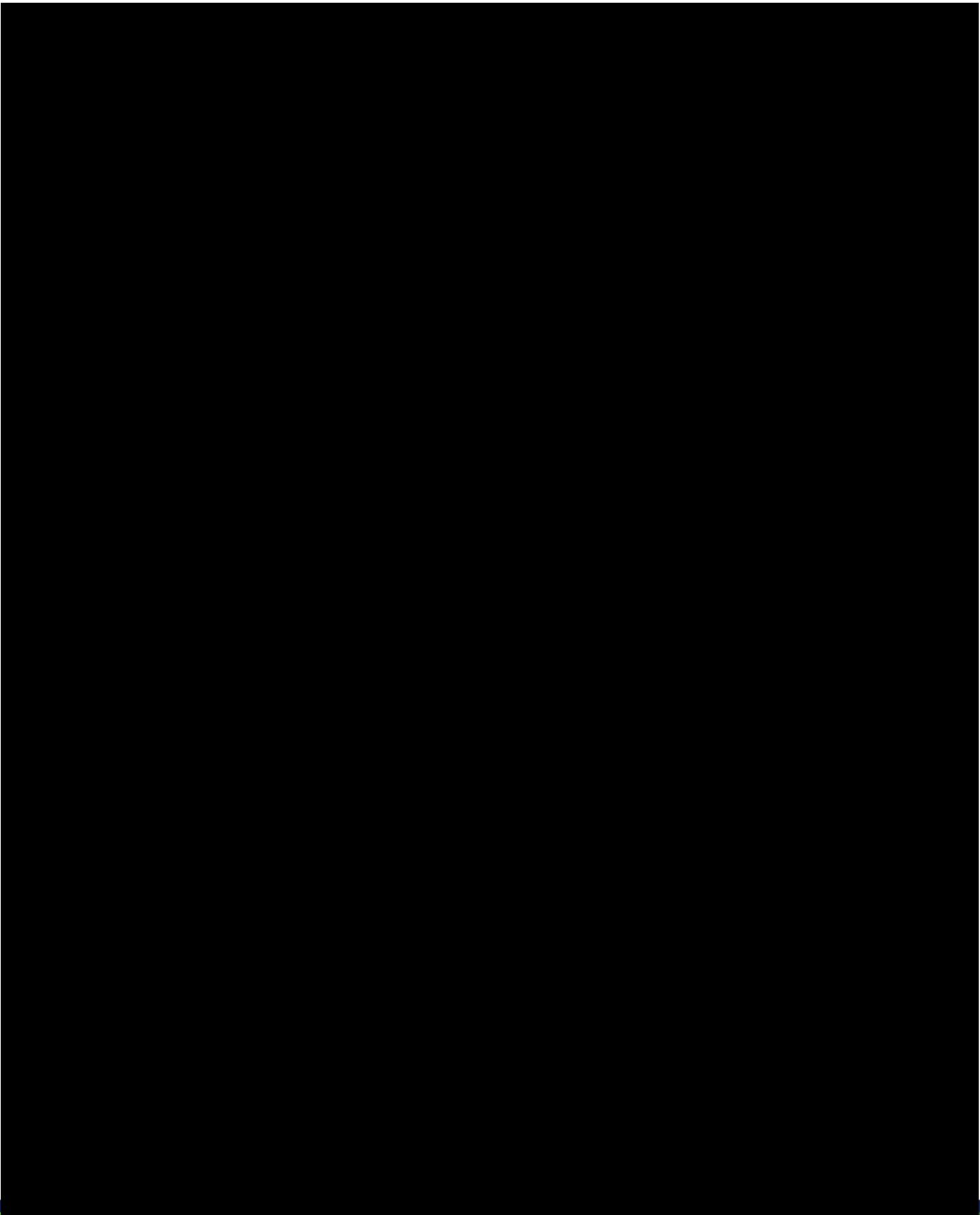


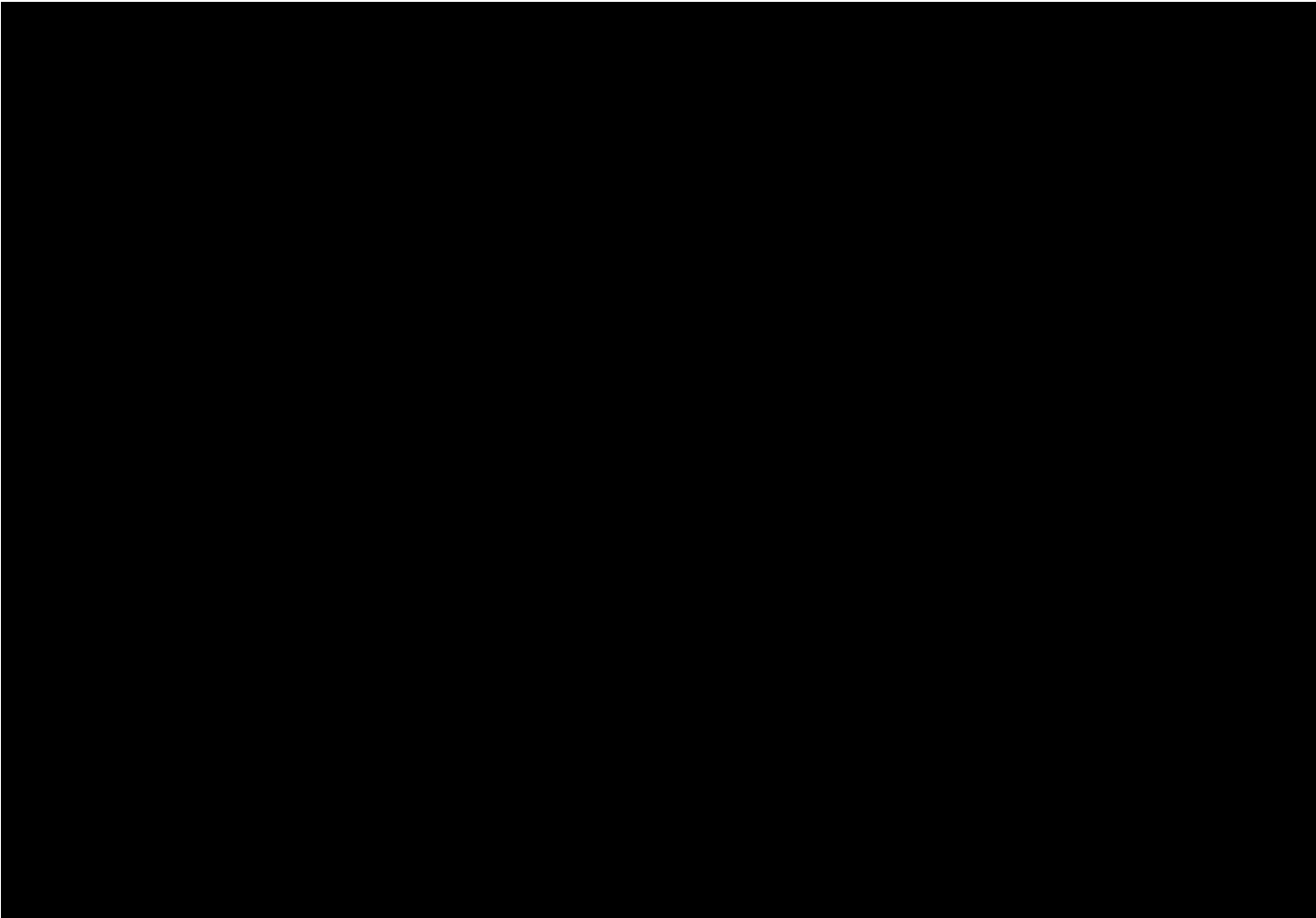


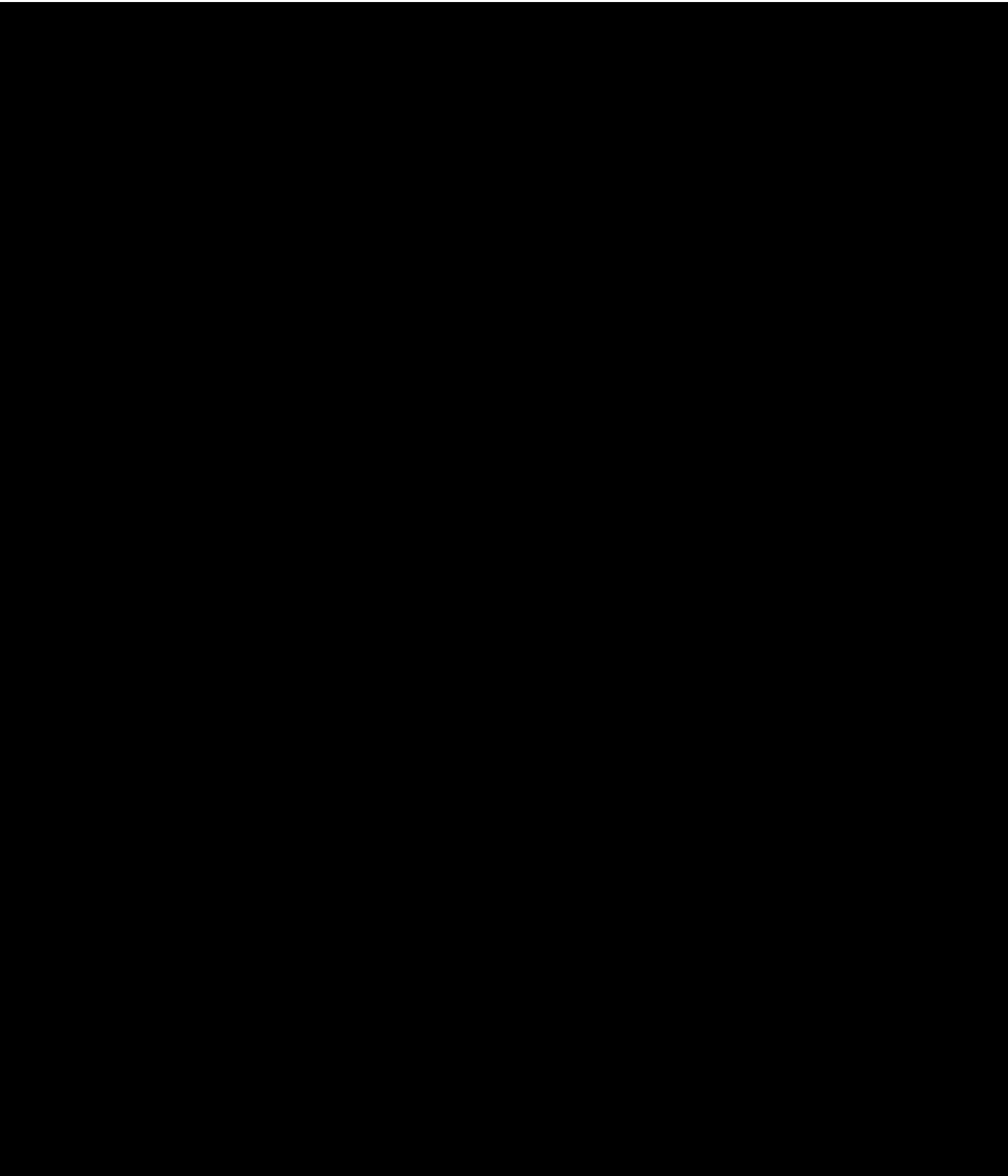


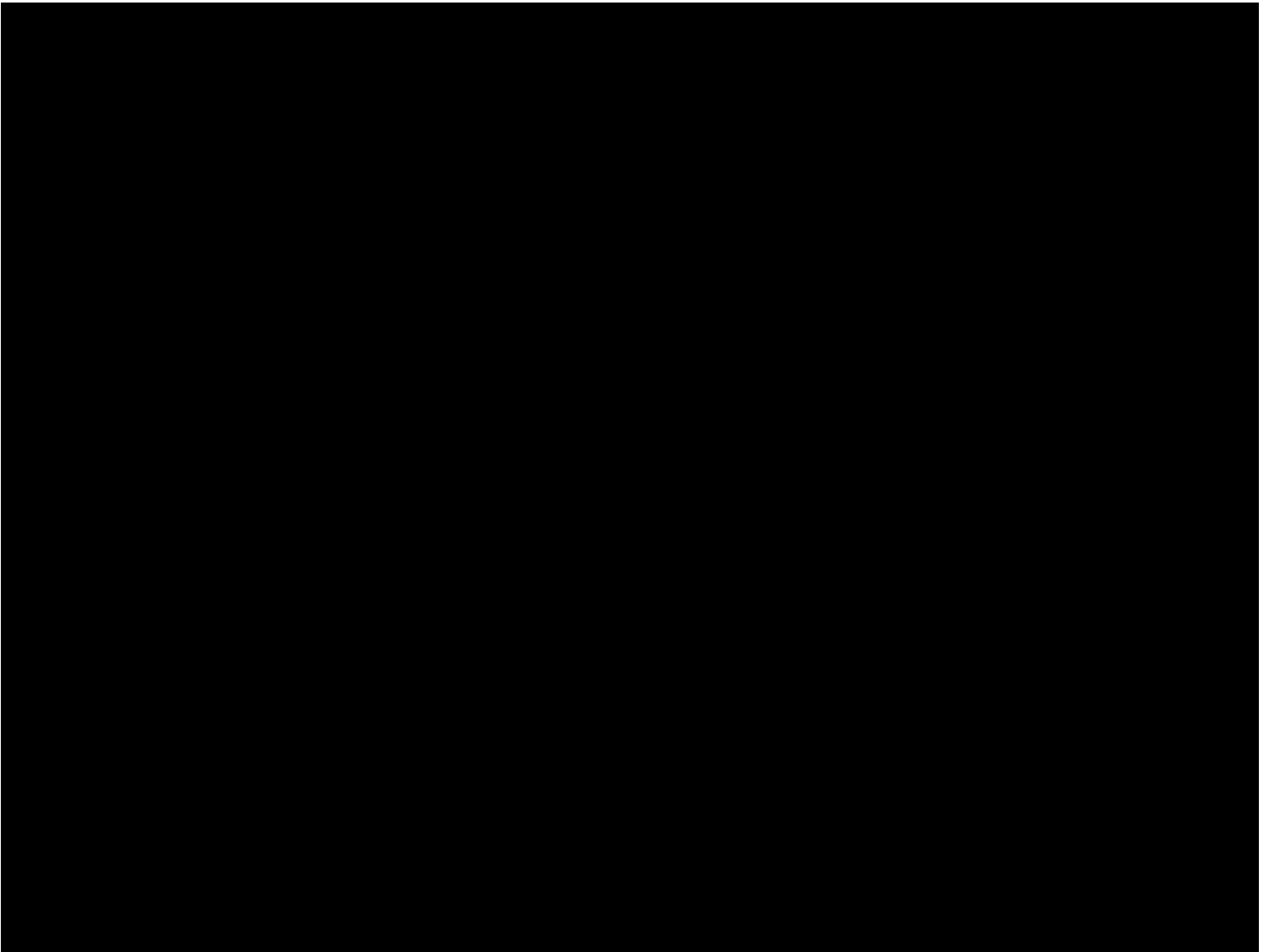


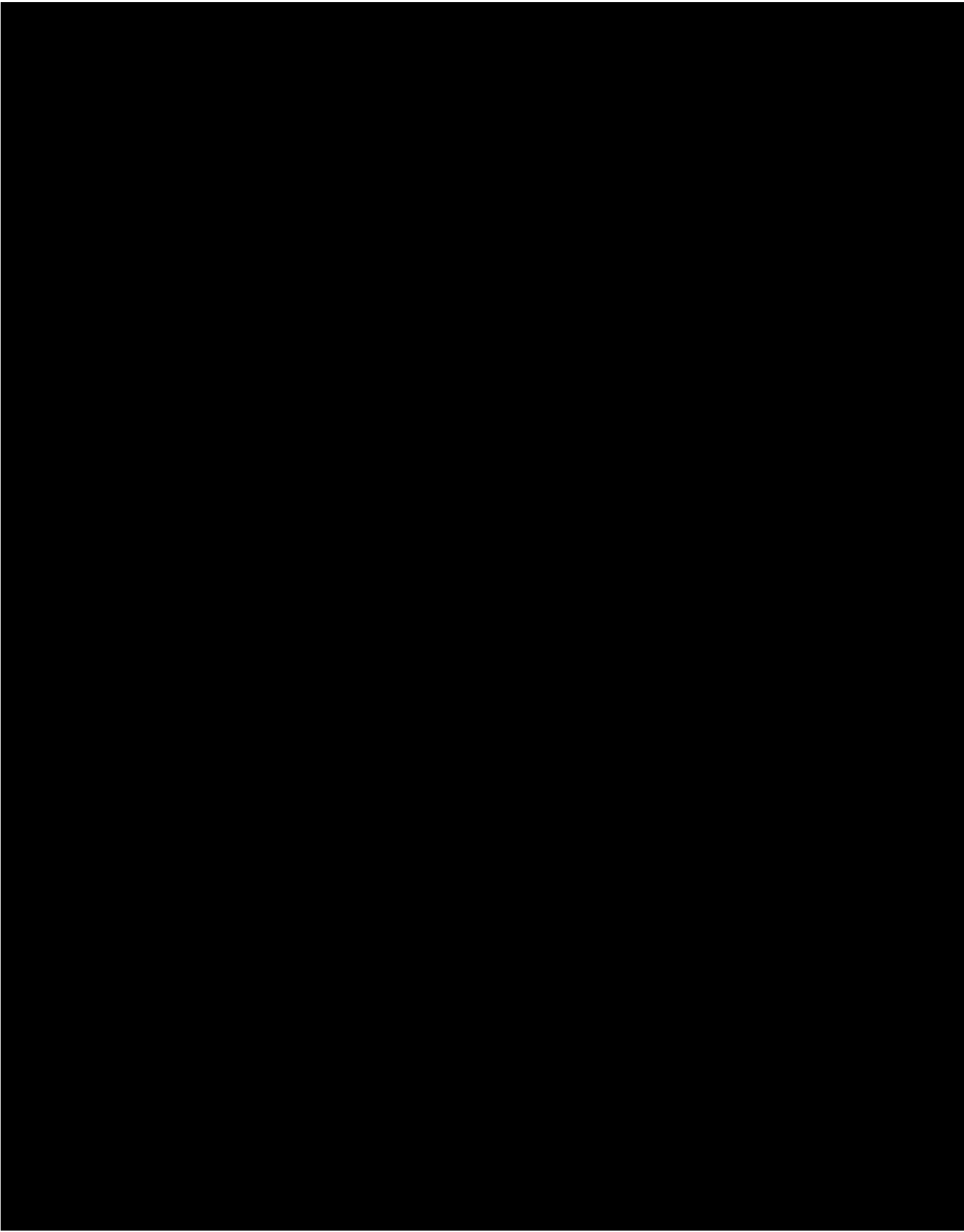










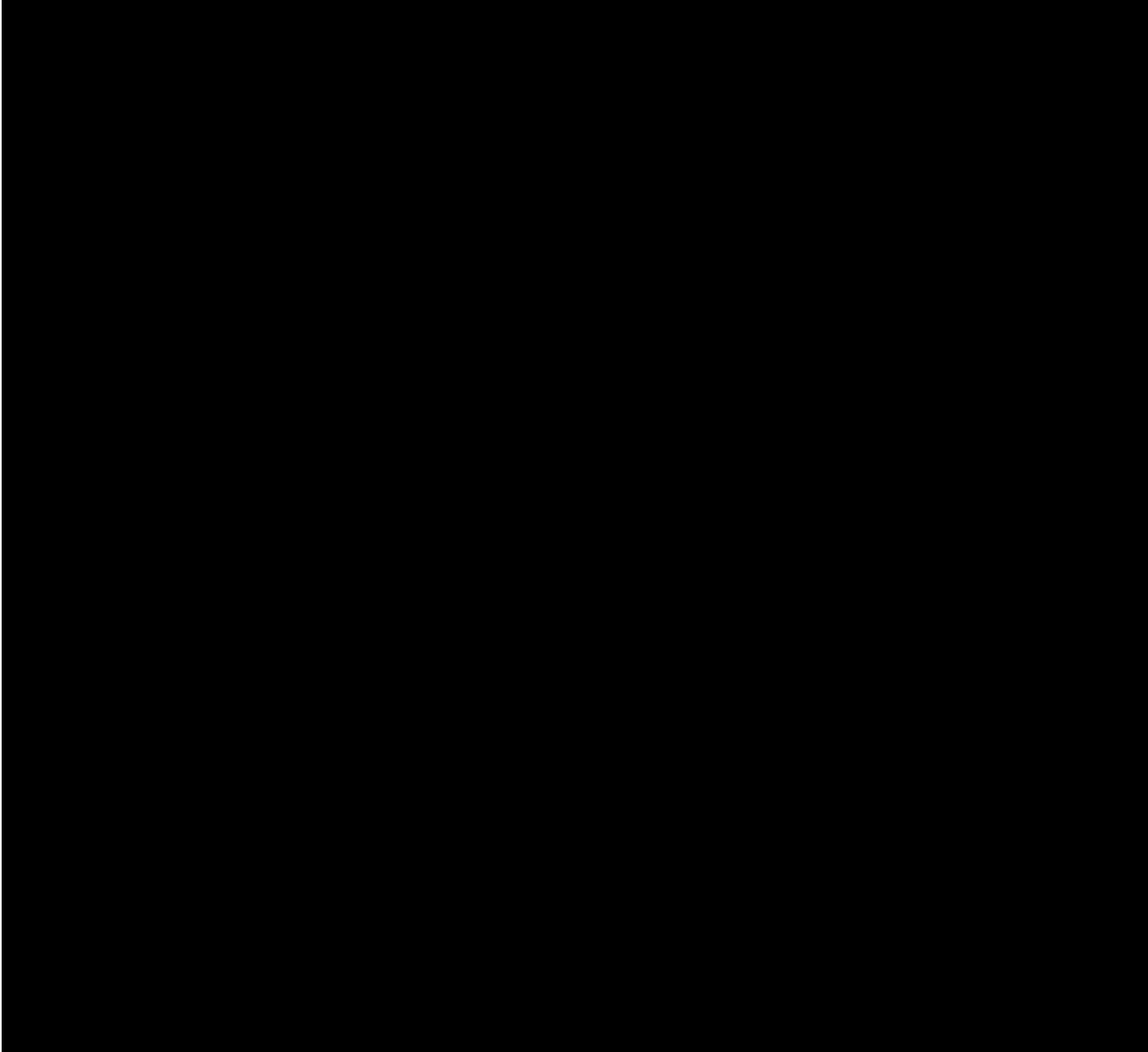


LUMA

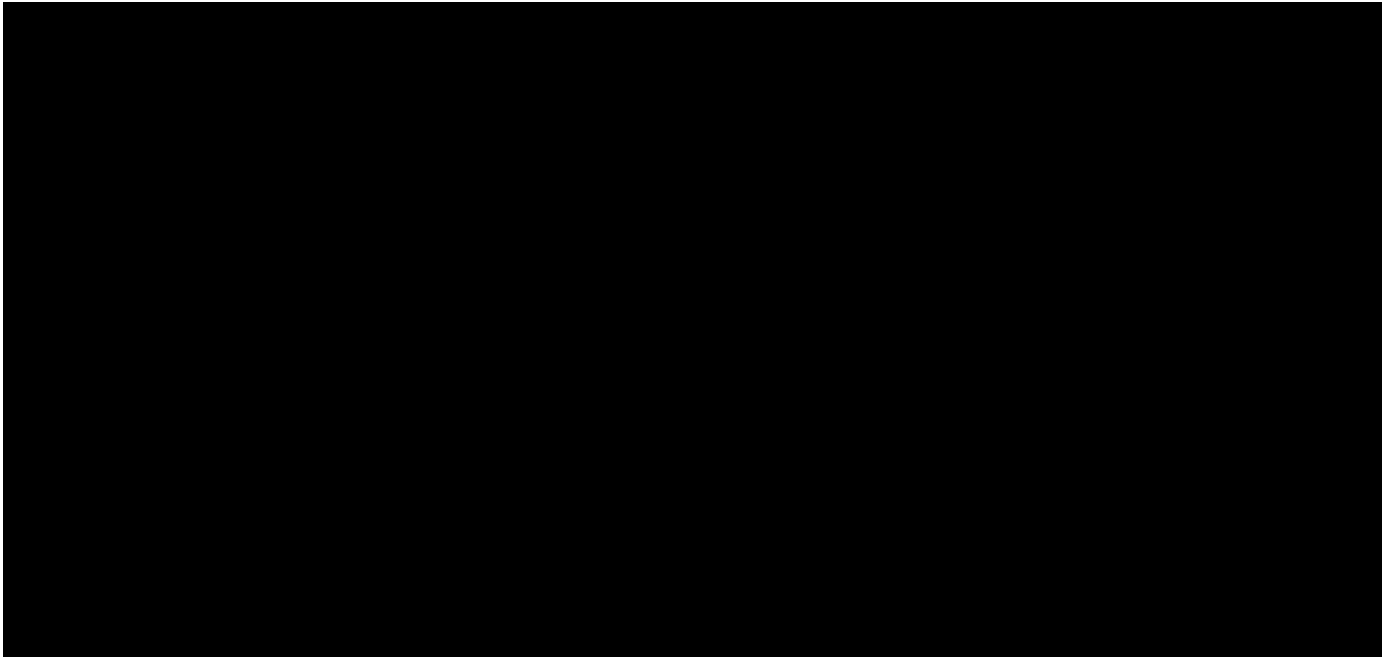
Data Security Plan

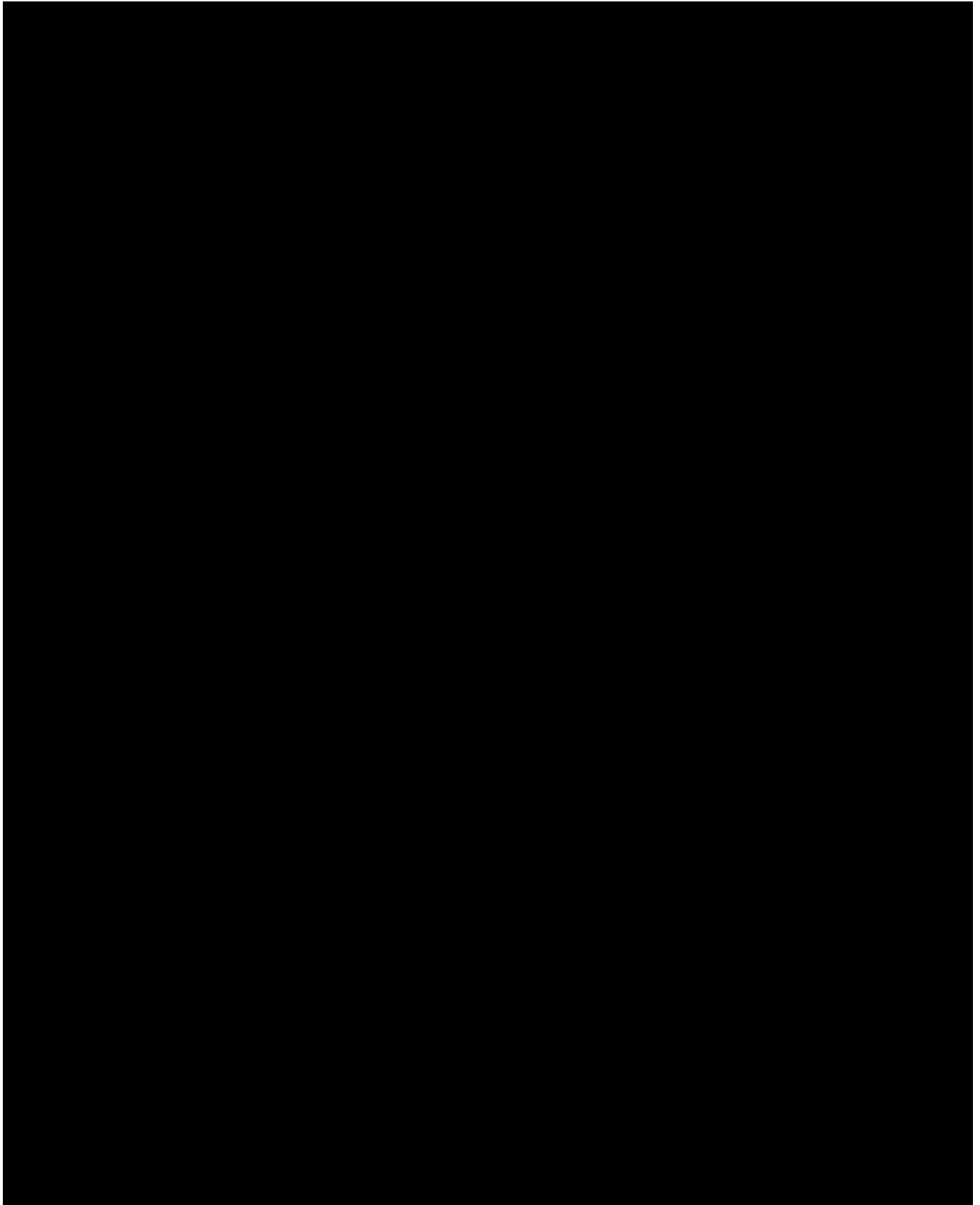
IT OT | Security & Compliance

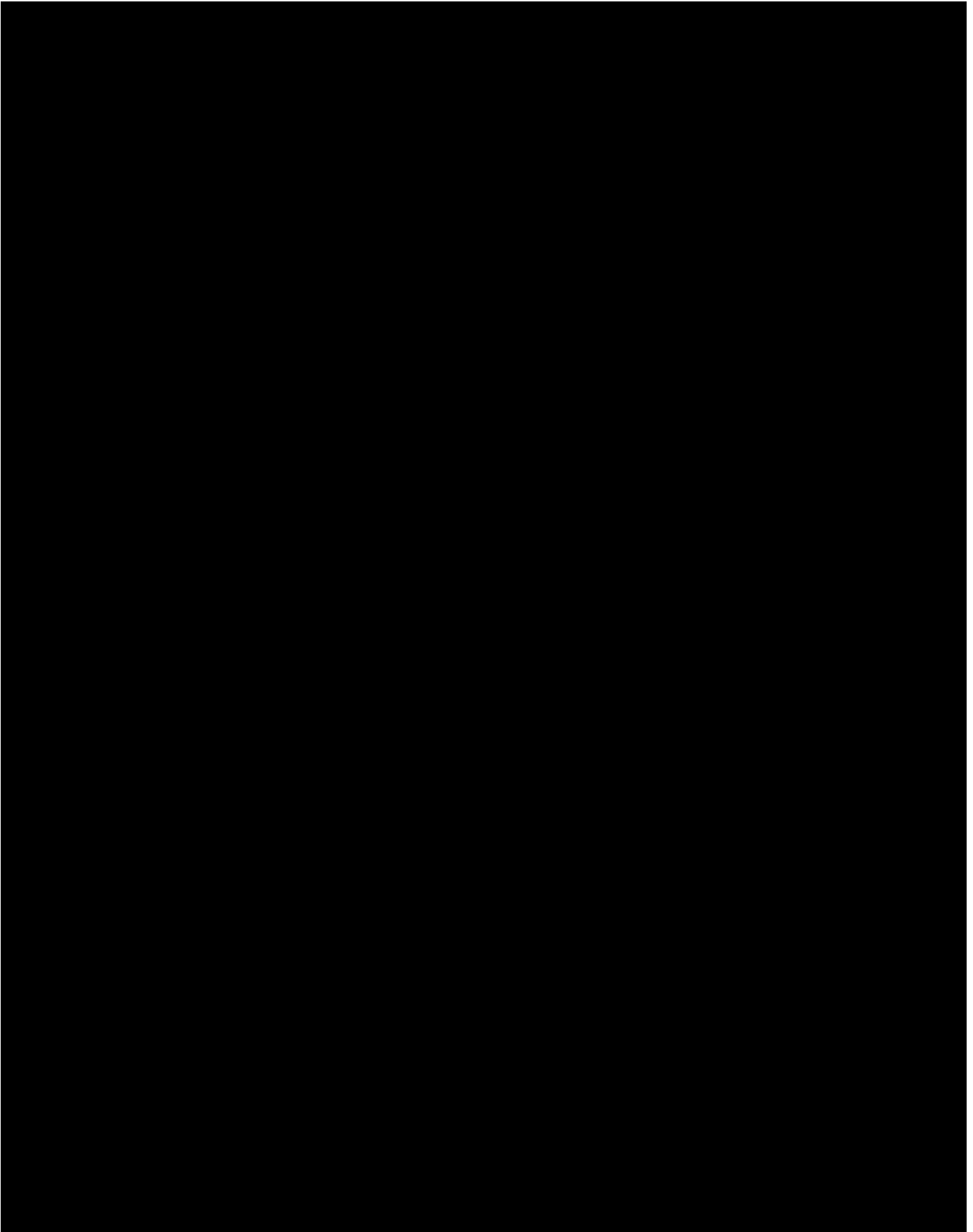
V 1.0



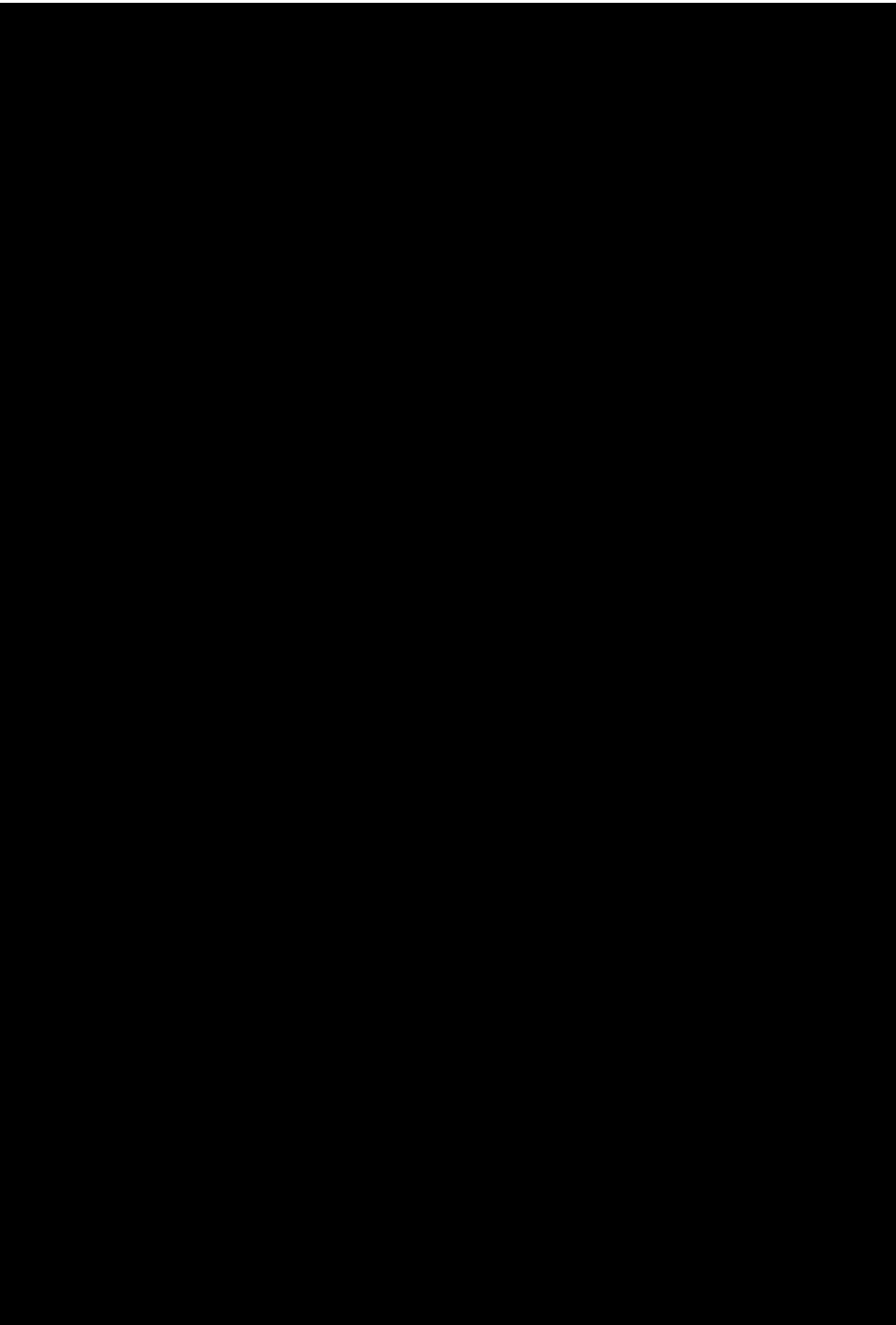
Data Security Plan

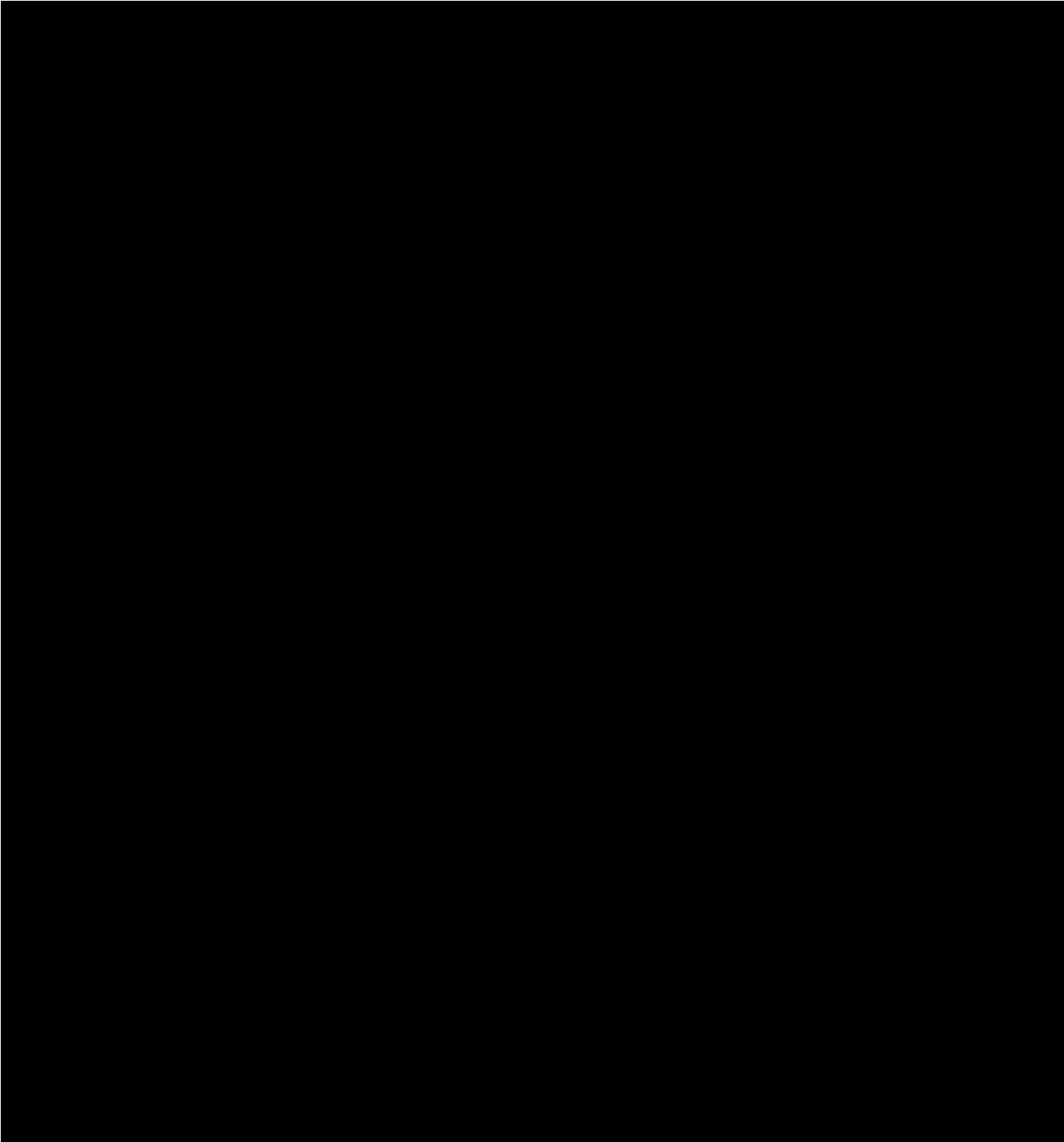


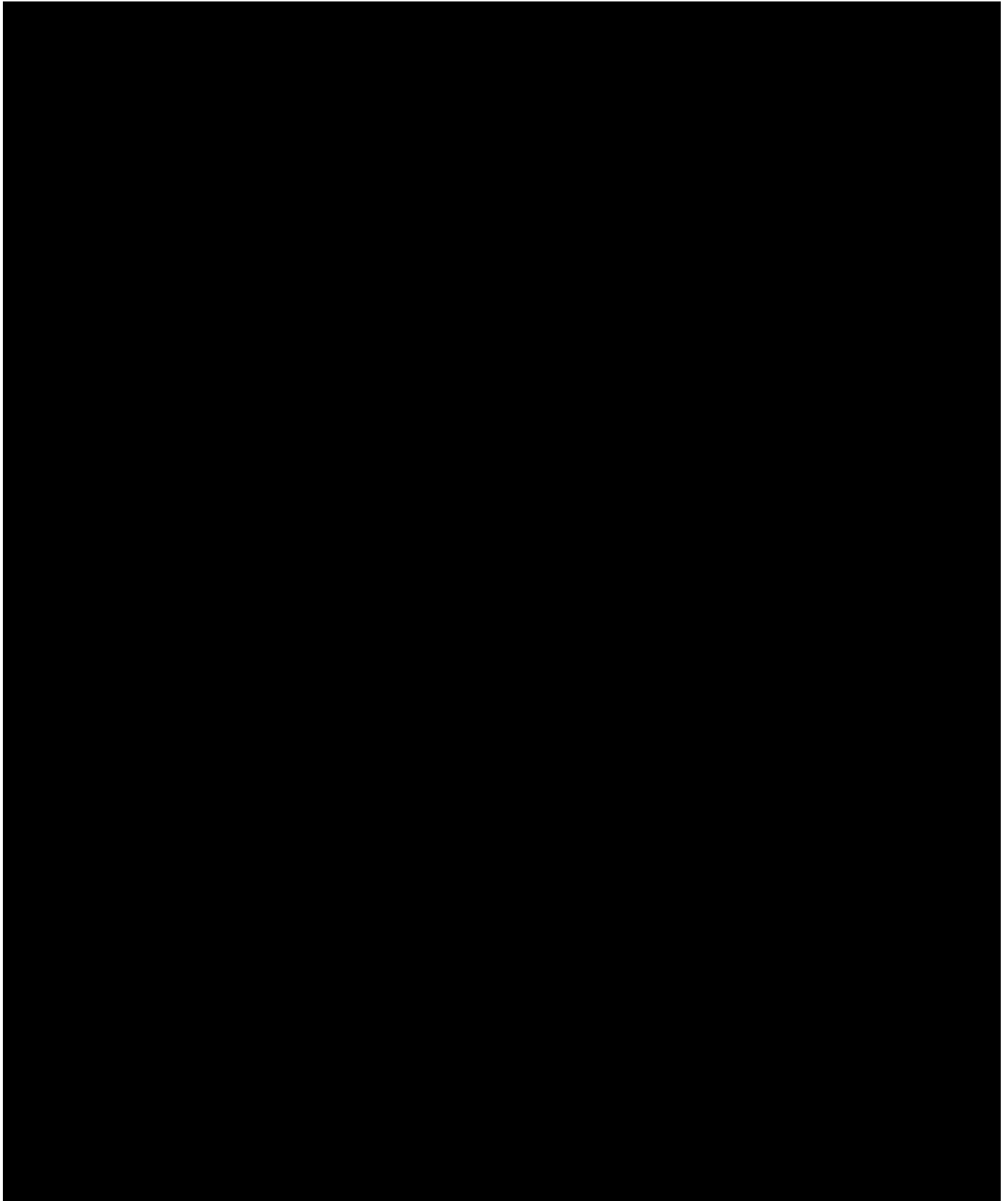


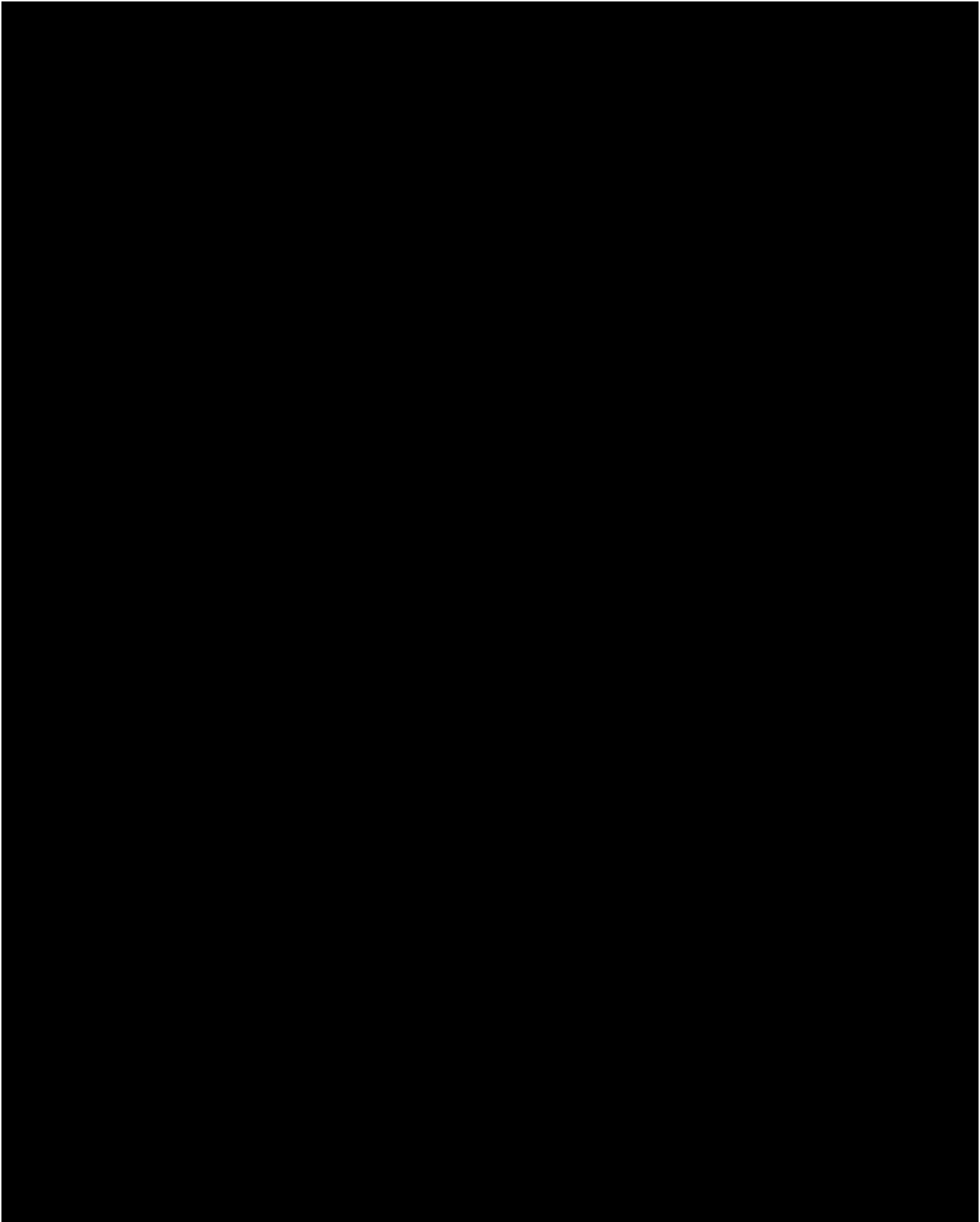


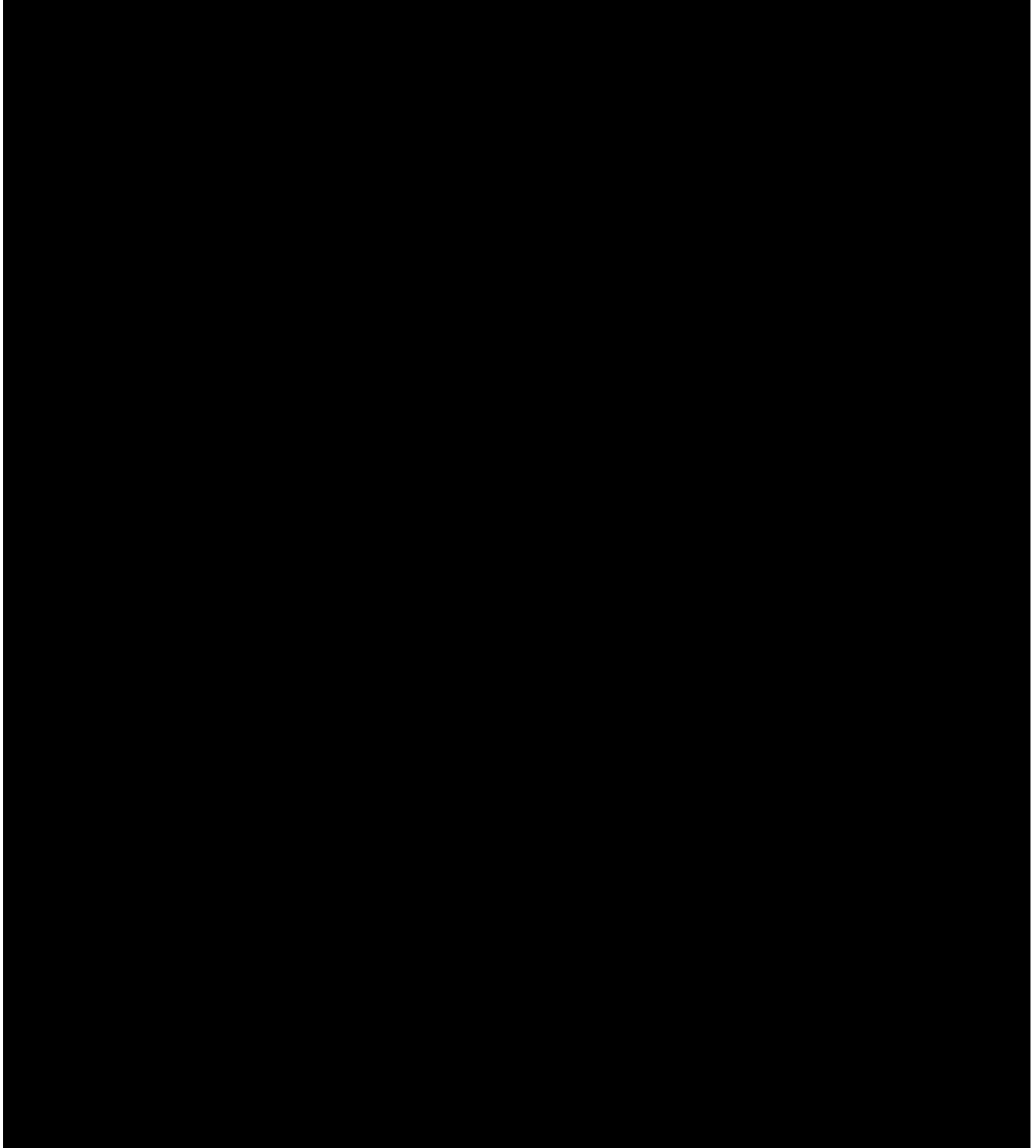
Data Security Plan

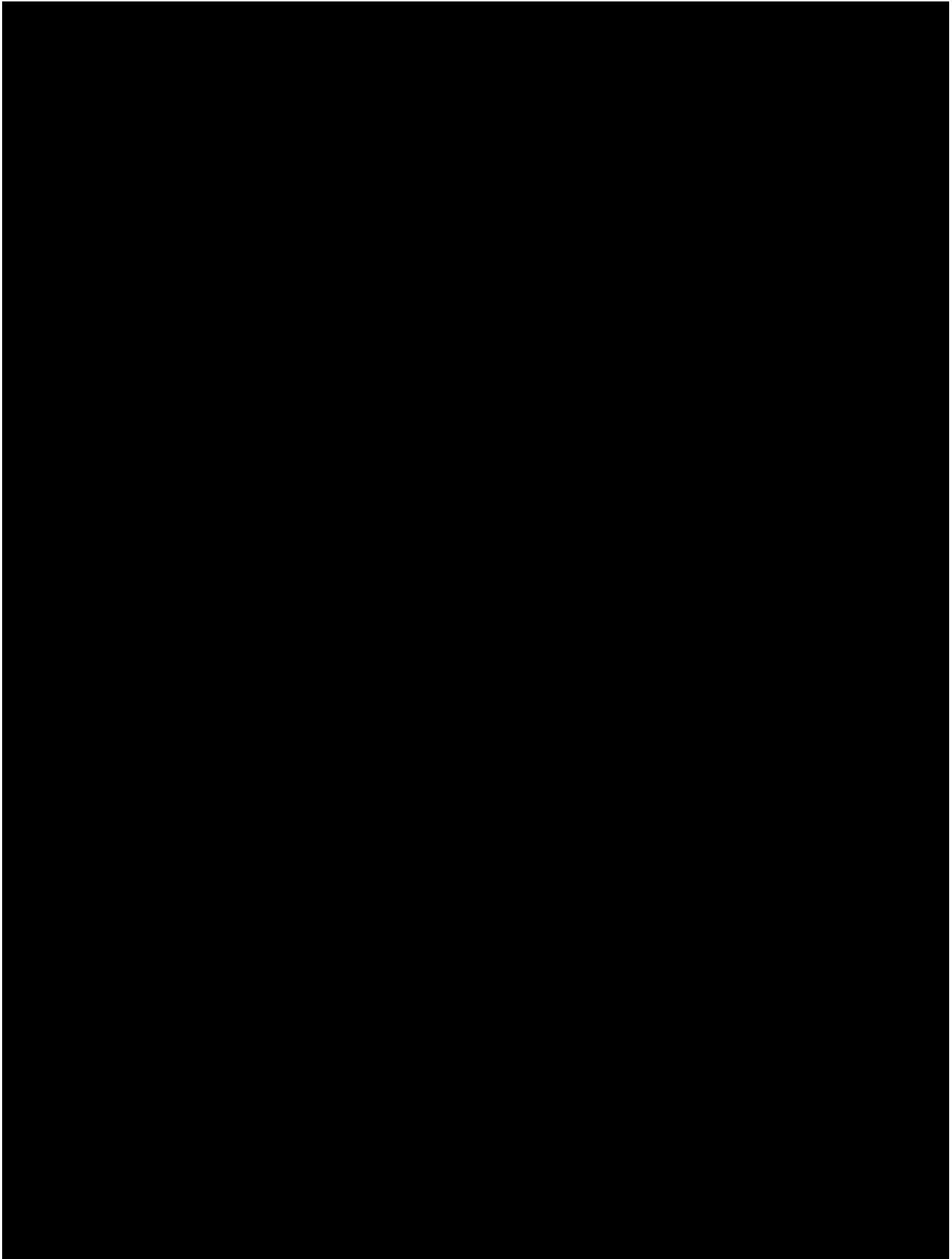


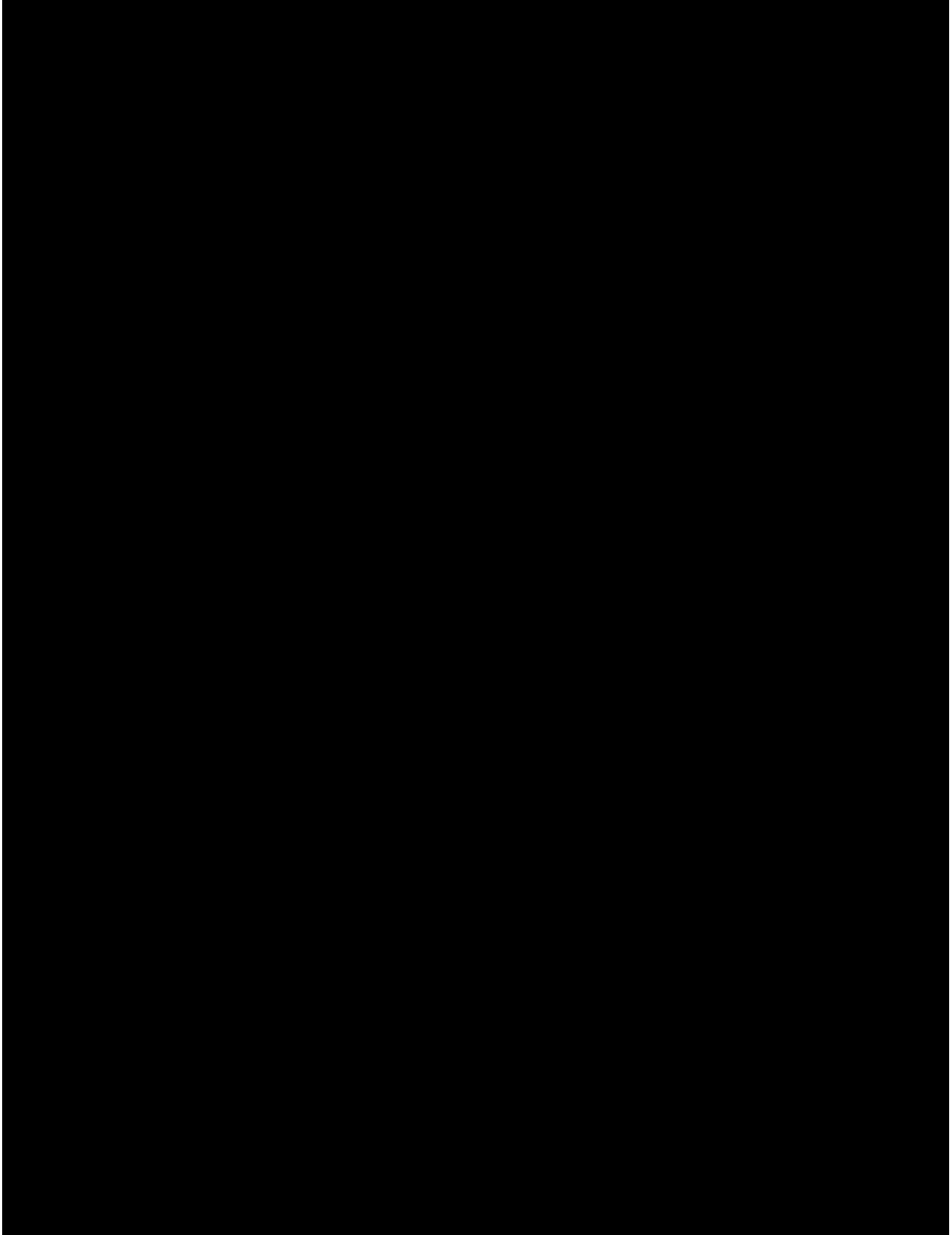


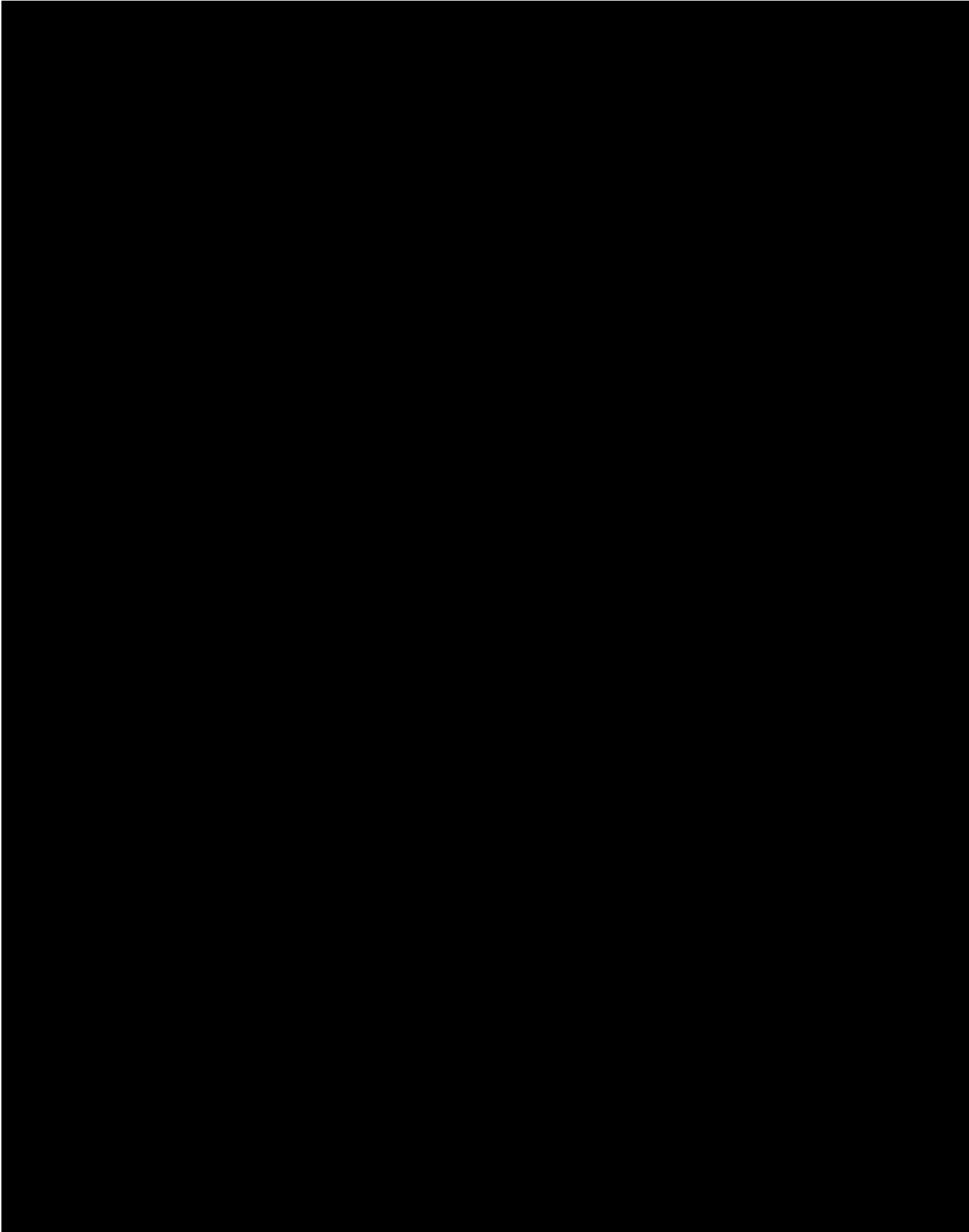


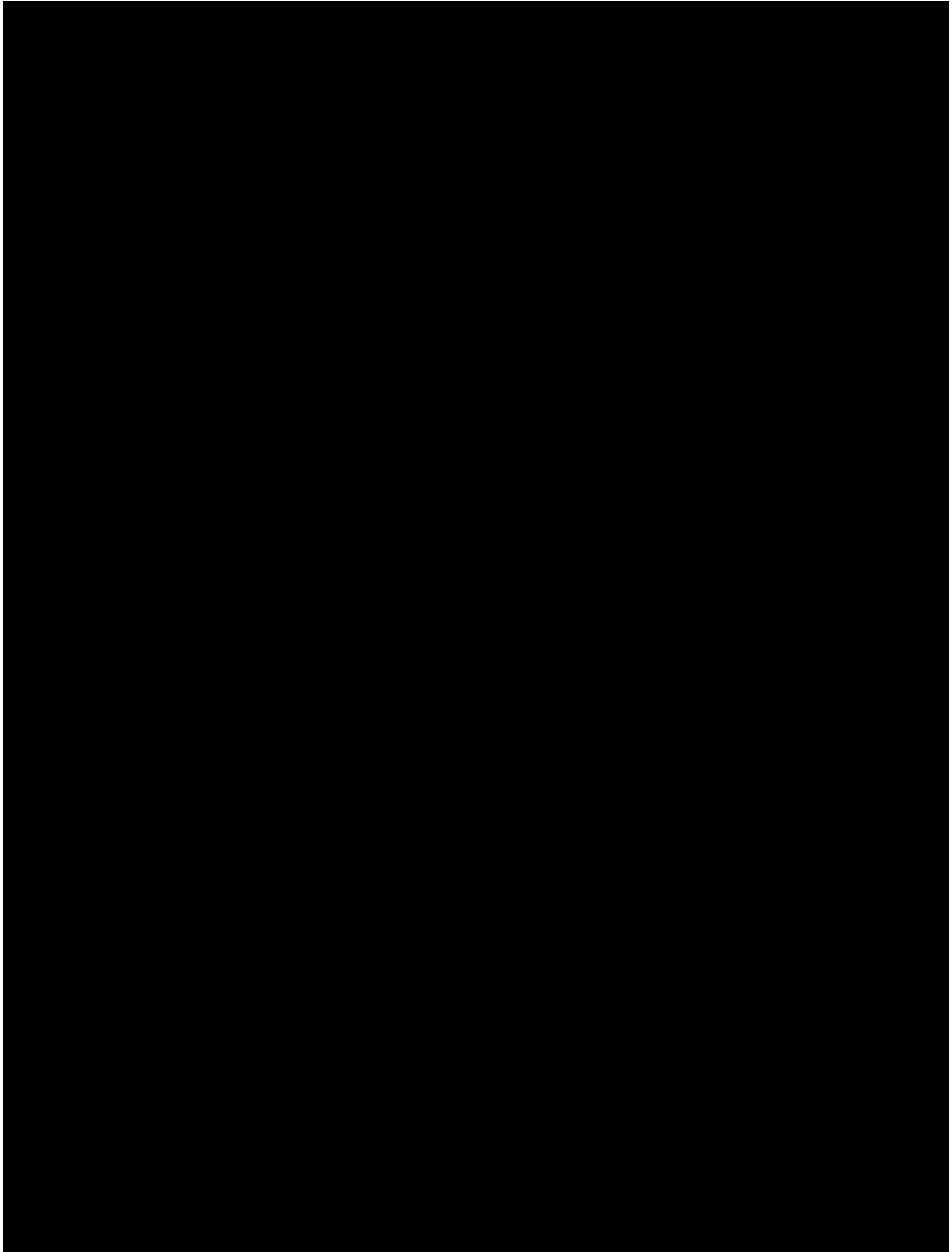


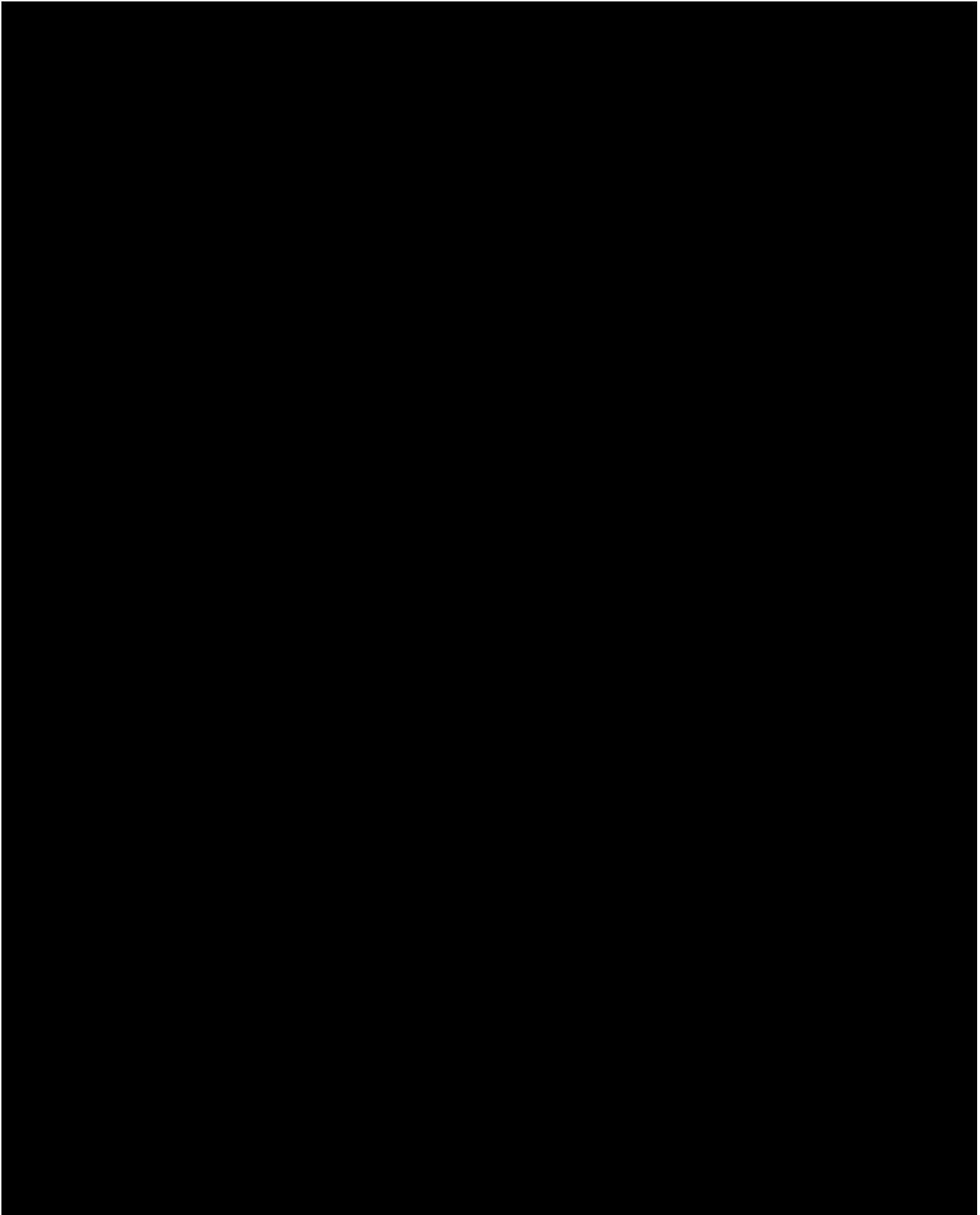




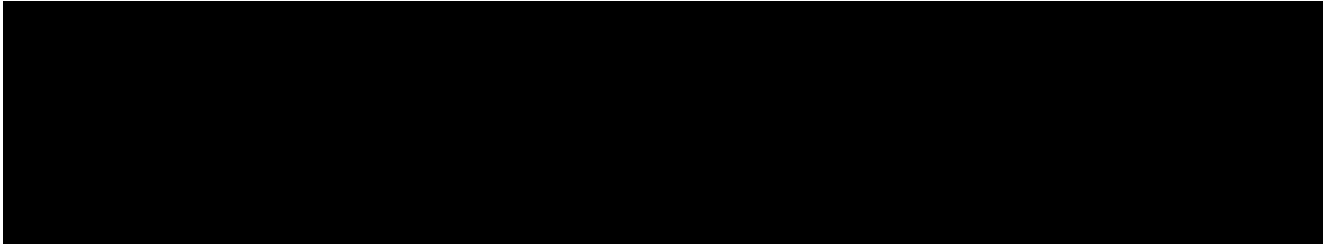


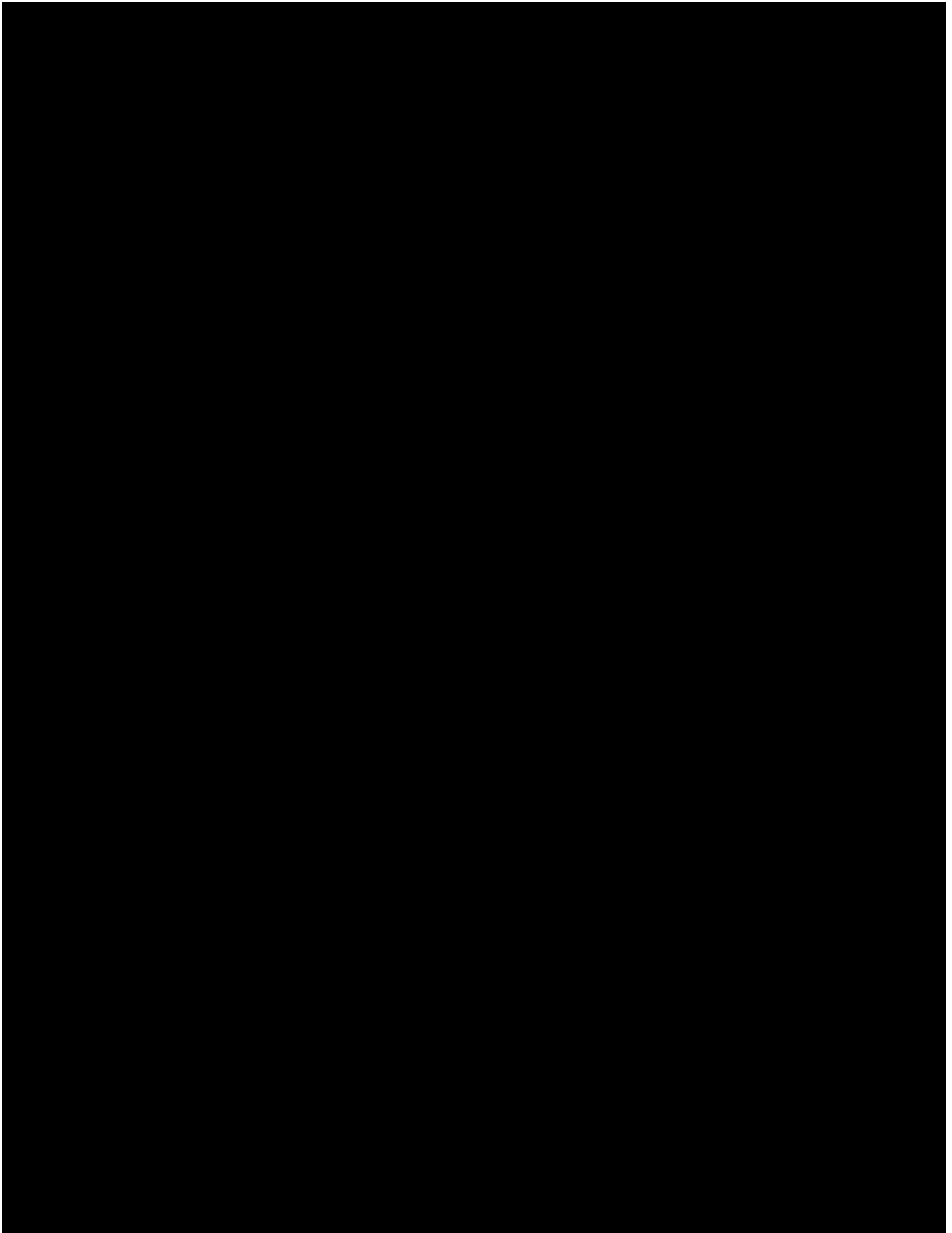


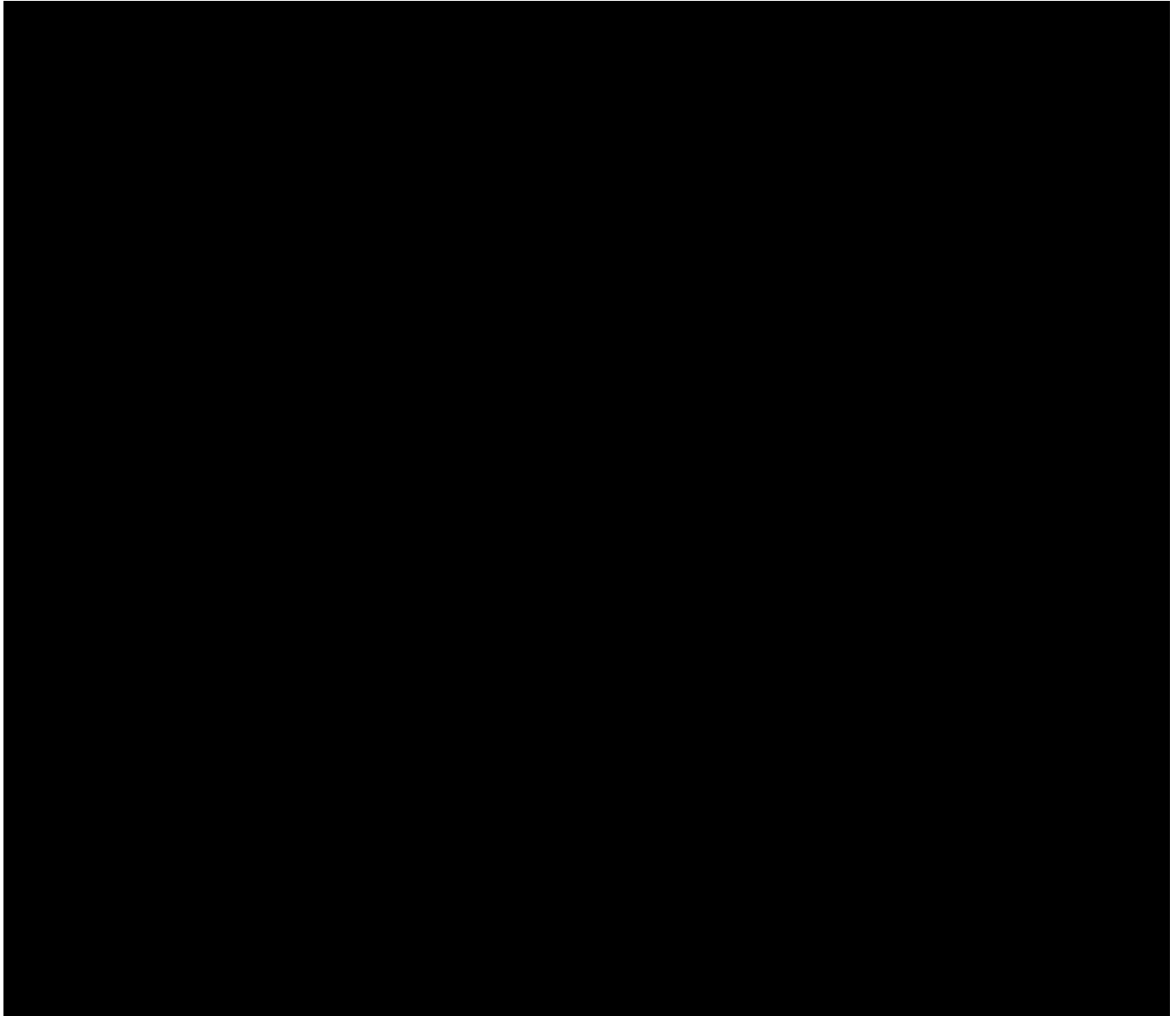


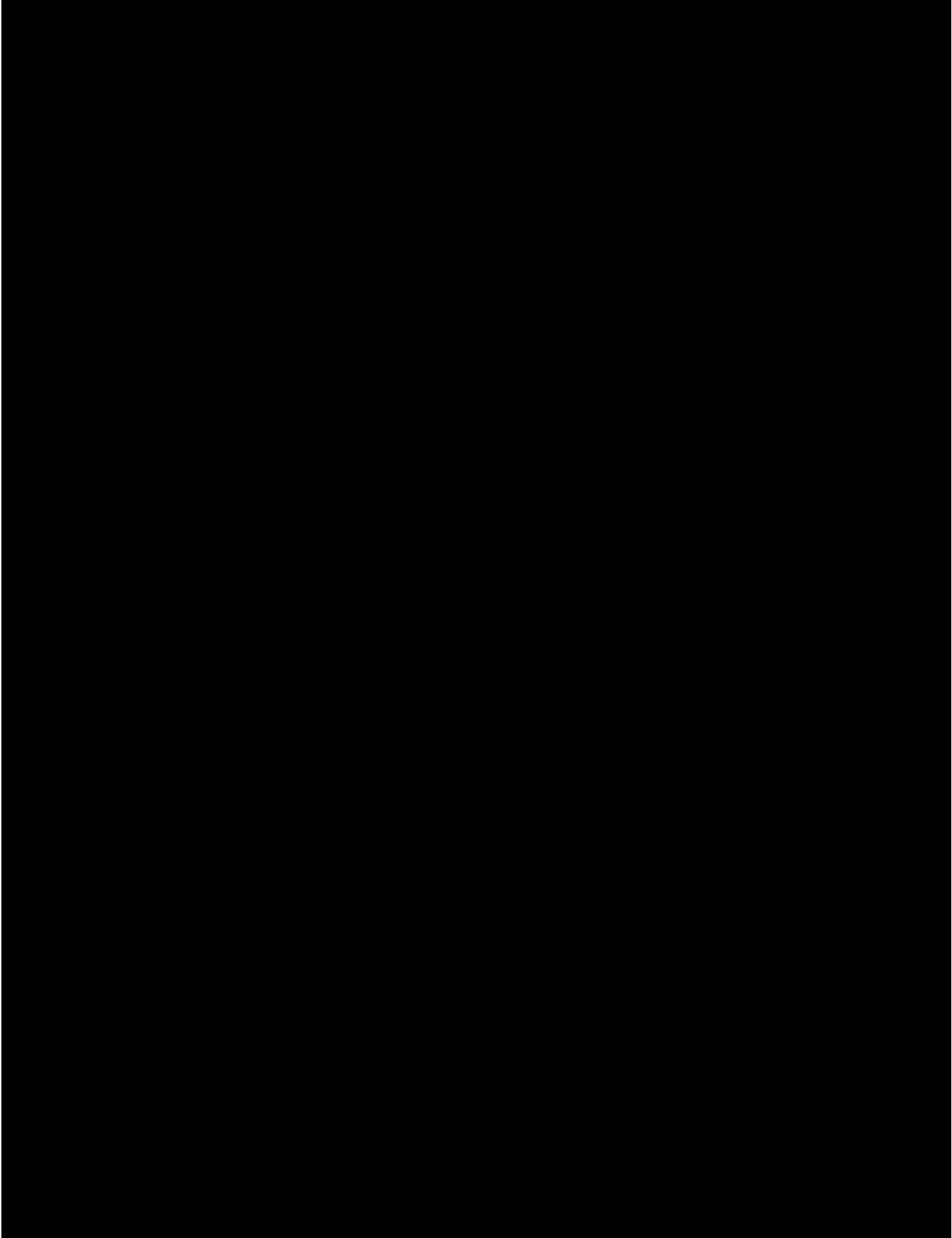


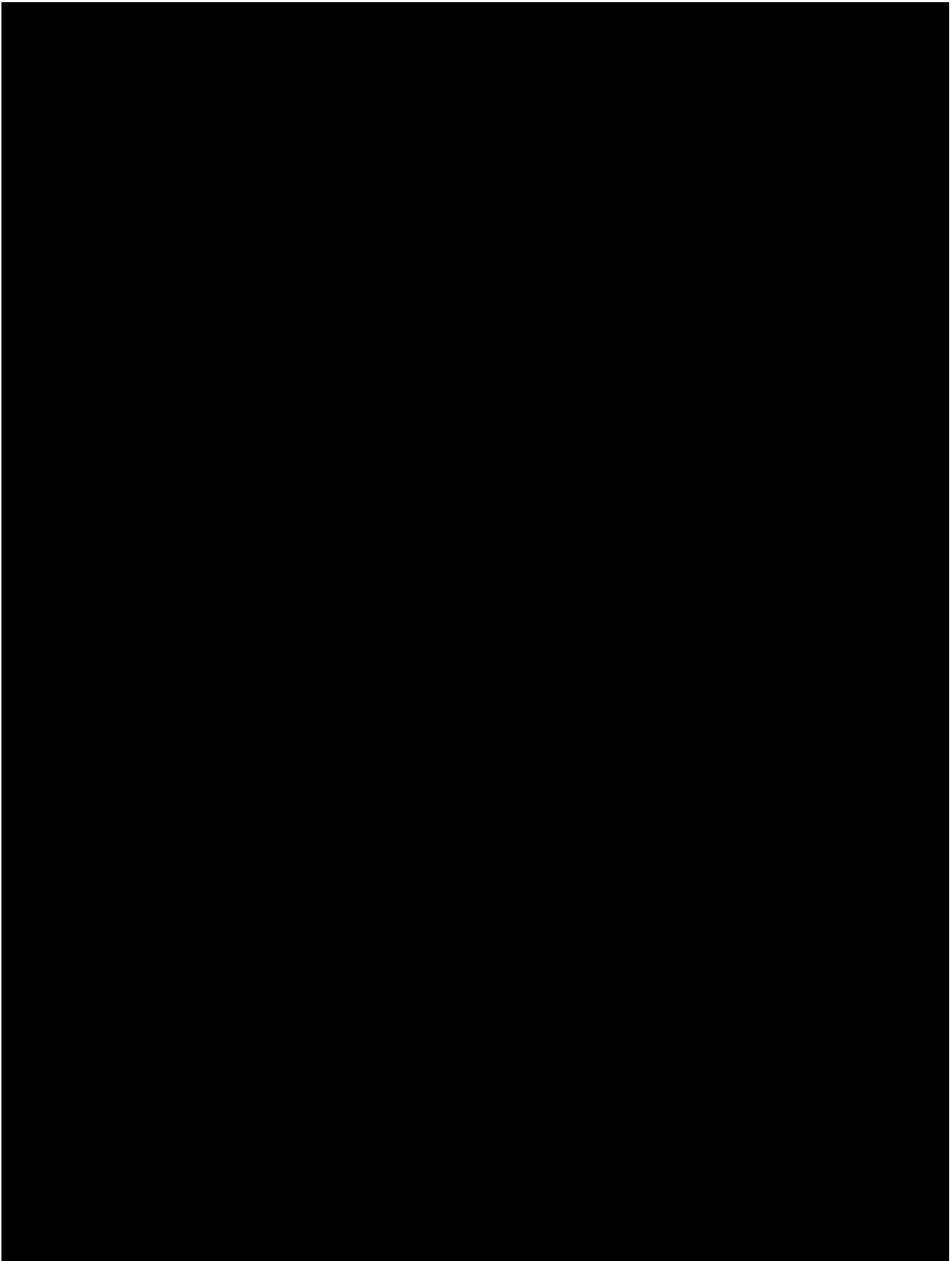
Data Security Plan

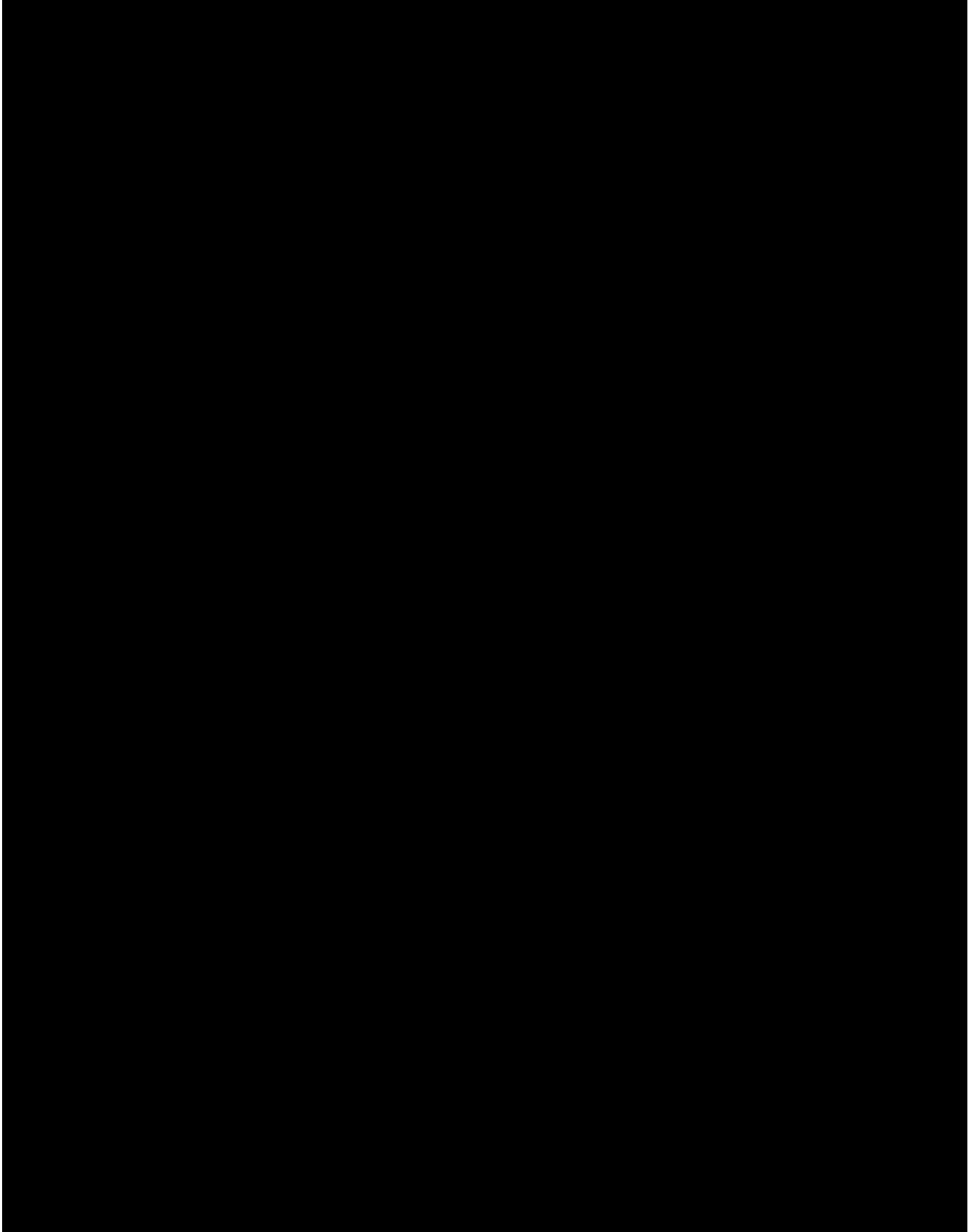


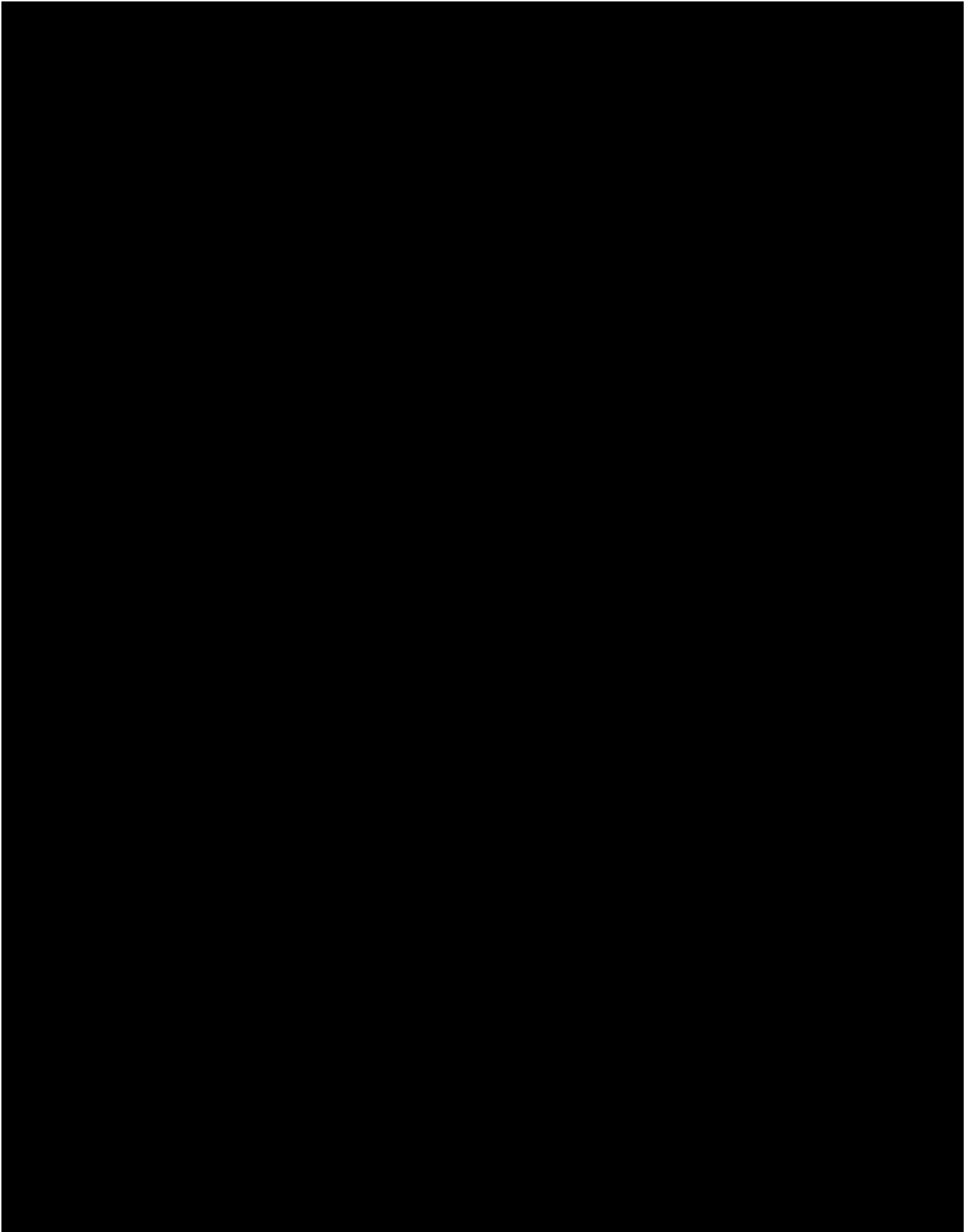


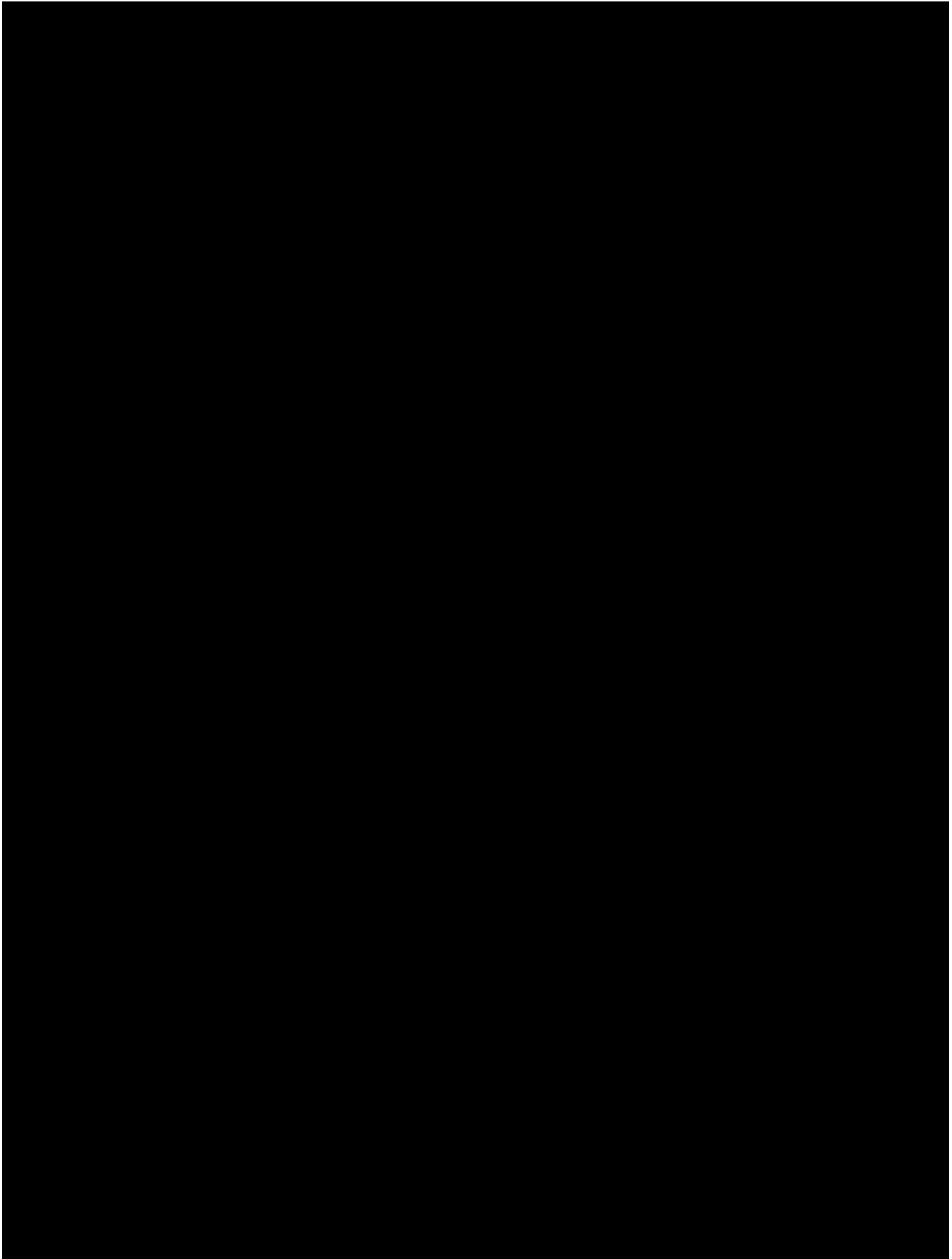












Data Security Plan



