

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

NEPR Received: Jun 15, 2021 11:46 AM

IN RE:

IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY'S PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Urgent Request for Extension of Time to File
FCA, PPCA and FOS Quarterly Reconciliations and
Proposed Factors.**

**URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT FCA, PPCA AND FOS
QUARTERLY RECONCILIATIONS AND PROPOSED FACTORS**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. In a Resolution and Order issued on March 31, 2021, this Energy Bureau set the FCA, PPCA and FOS factors to be applicable from April 1, 2021 until June 30, 2021 (“March 31st Order”). In the March 31st Order, the Energy Bureau also directed that on or before June 15th, 2021 at noon, LUMA shall file the FCA, PPC and FOS reconciliations for the months of March, April and May, 2021, and the proposed factors to be applied from July 1, 2021 until September 30, 2021.
2. Exercising its role and duties over system regulatory matters pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution Operation and Maintenance Agreement (“OMA”) as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement, LUMA has been preparing the quarterly reconciliations for the months of March, April and May, 2021, and the proposed factors for the FCA, PPCA and FOS riders to be applied from July 1, 2021 until September 30, 2021.

3. It is respectfully submitted that despite its better efforts and cooperation with personnel from the Puerto Rico Electric Power Authority (PREPA) in charge of providing information related to fuel costs and purchased power costs, LUMA has not been able to obtain and review all of the data to responsibly file today the quarterly reconciliation and proposed factors for the FCA, PPCA and FOS riders to be applied from July 1, 2021 until September 30, 2021.
4. Particularly, LUMA will need one additional business day to complete its review of the underlying relevant data, finalize calculations and prepare the exhibits that will be filed with the Energy Bureau both in public and confidential formats.
5. LUMA respectfully requests until end of day of June 16, 2021, to file the quarterly reconciliation and proposed FCA, PPCA and FOS factors.
6. LUMA continues to work with its officials and employees to organize the supporting data and conduct the necessary analyses to file the reconciliations and proposed factors with this honorable Energy Bureau. LUMA respectfully posits that it will file the reconciliations and proposed factors as soon as the diligences are concluded and, if possible, prior to end of day of June 16th.
7. LUMA is cognizant of the importance of granting the Bureau time to consider requests for extension of time such as this. And LUMA intends to comply with the Bureau's directives to file requests for extensions of time in reasonable anticipation of the relevant deadline. With regards to the quarterly reconciliations and proposed factors, LUMA officers worked until the late-night hours of June 14, 2021 to complete key tasks. That was done to enable LUMA to file the reconciliations and proposed factors today. Unfortunately, this morning LUMA officers confirmed that data is still needed, and that additional time is essential to complete the

relevant calculations for the reconciliations and proposed factors. Thus, this Motion is filed at the earliest time possible. This Motion was not filed yesterday, as LUMA was working towards meeting the June 15th noon deadline.

8. This request for extension is filed in good faith, without intent to delay the Energy Bureau's processes to conduct the quarterly reconciliations and fix the proposed factors for the FCA, PPCA and FOS riders.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** this request for extension of time until end of day of June 16, 2021, to file the FCA, PPCA and FOS reconciliations for the months of March, April, and May 2021, and the proposed factors to be in force from July 1, 2021 until September 30, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of June 2021.

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau.



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