

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

**NEPR**

**Received:**

**Jun 3, 2021**

**10:37 AM**

**IN RE:**

IN RE: PUERTO RICO ELECTRIC POWER  
AUTHORITY PERMANENT RATE

**CASE NO. NEPR-MI-2020-0001**

**SUBJECT: CILT, SUBA-HH and SUBA-NHH  
Proposed Factors**

**REQUEST FOR EXTENSION OF TIME TO SUBMIT CILT, SUBA-HH AND SUBA-NHH 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. This honorable Energy Bureau’s approval and revisions of the factors associated with several riders including, contributions in lieu of taxes cost adjustment (CILTA), help to human subsidies (SUBA-HH), non-help to human subsidies (SUBA-NHH), Fuel Charge Adjustment (FCA), the Purchased Power Charge Adjustment (PPCA), and the Fuel Oil Subsidy (FOS), arise under a Resolution and Order dated April 23, 2019 issued in Case No. CEPR-AP-2015-0001 and NEPR-AP-2018-0003.

2. The particulars of the timing to file annual proposed CILTA, SUBA- HH and SUBA-NHH factors are stated in the Tariff Book for the Puerto Rico Electric Power Authority (PREPA), at page 55 for CILTA, page 57 for SUBA-HH and page 59 for SUBA-NHH. The filings before this Energy Bureau of the proposed factors are due before the end of the eleventh month of

each annual time-period. *See id.* The proposed factors would go into effect in the first billing cycle of the first month of the annual time-period. *See id.*

3. 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 is preparing to file the CILTA, SUBA-HH and SUBA-NHH annual proposed factors.

4. It is respectfully submitted that additional time until June 15, 2021 at noon, is needed to file the CILTA, SUBA-HH and SUBA-NHH reconciliations and proposed factors.

5. Preparation of the CILTA, SUBA-HH and SUBA-NHH proposed factors requires the input of myriad former PREPA and current LUMA employees all of whom were not fully available during the week of May 24<sup>th</sup>, 2021 to complete the collection of relevant data and requisite analyses.

6. LUMA is currently working with its officials and employees to organize the supporting data and conduct the necessary analyses to file the proposed factors with this honorable Energy Bureau. In good faith, it is estimated that LUMA will need until June 15, 2021 at noon, to file the CILTA, SUBA-HH and SUBA-NHH proposed factors.

7. It is respectfully submitted that LUMA is expediting this process to file the proposed factors and supporting data prior to June 15, 2021. As of the date of this filing, however, LUMA estimates that it will need the whole of next week to conclude the requisite analyses to present a complete and responsible submission with this honorable Energy Bureau.

8. Respectfully, LUMA notes that the additional time requested herein is consistent with the deadline for filing the quarterly reconciliations for March, April and May, 2021 and the proposed factors for FCA, PPCA and FOS, which, pursuant to a Resolution and Order issued by this Energy Bureau on March 31, 2021 in this proceeding, are due on June 15, 2021 at noon.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** this request for extension of time to file the CILTA, SUBA-HH and SUBA-NHH proposed factors, on or before June 15, 2021 at noon.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of June 2021.

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



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