

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

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

CASE NO. NEPR-MI-2021-0001

**SUBJECT: Submission of Updated
Timeline for Completion of Phase II
Operating Procedures.**

**MOTION SUBMITTING UPDATED TIMELINE FOR COMPLETION OF PHASE II
OPERATING PROCEDURES**

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 submit the following:

1. On May 31, 2021, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued and published a Resolution and Order approving LUMA’s proposed System Operation Principles with conditions (“May 31st SOP Resolution and Order”).
2. In Section IV of the May 31st SOP Resolution and Order, paragraph 1, the Energy Bureau required that LUMA provide in a period of thirty (30) days, “a detailed updated timeline for the completion of any other procedure, protocol, manual or document necessary for the operation of the system in accordance with prudent industry practices, standards and local laws and regulations, including but not limited to the draft procedures filed on May 19, 2021.” See May 31st SOP Resolution and Order at pages 13-14. The Energy Bureau further directed that the timeline be filed in Gantt Chart format detailing tasks and identifying personnel in charge of the tasks. The Energy Bureau also stated that the timeline shall not

exceed five months. *Id.* Finally, the Energy Bureau directed that starting July 5, 2021, LUMA shall provide monthly updates of the timeline. *Id.*, paragraph 4, at page 14.

3. On June 22, 2021, LUMA filed a “Request for Clarifications and/or Reconsideration of May 31st Resolution and Order Approving LUMA’s System Operation Principles” (“June 22nd Request for Clarifications”). Among others, in the June 22nd Request for Clarifications, LUMA requested that the Energy Bureau reconsider that portion of the May 31st SOP Resolution and Order that requires that LUMA file monthly updates of the timeline for completion of Phase II operating procedures. *See* June 22nd Request for Clarifications at page 14. Said request is pending consideration by the Energy Bureau.
4. With the June 22nd Request for Clarifications, LUMA submitted a Gantt Chart with the timeline for completion of the procedures identified in the SOP Appendix A, including, as ordered, the fifteen Phase II procedures. *See* Exhibit 1 to June 22nd Request for Clarifications. LUMA also identified the officers in charge of collaborative efforts to complete the operating procedures. *See Id.*
5. Given that LUMA’s June 22nd Request for Clarifications is pending adjudication by this Energy Bureau, and without waiving the request for the Energy Bureau to reconsider the order to produce monthly updates of the timeline to complete Phase II procedures, LUMA hereby submits via email as Exhibit 1 to this Motion, a Gantt Chart with an update on the status of the fifteen Phase II operating procedures.¹

WHEREFORE, LUMA respectfully requests that this Bureau **take notice** of the aforementioned, **accept** the updated timeline for completion of the Phase II operating procedures that is submitted as Exhibit 1 to this Motion, and **deem** that LUMA complied with that portion of

¹ July 5, 2021 was a legal holiday. Per Section 1.9 of Bureau Regulation 8543, this Motion is filed on the first business day following the legal holiday.

the May 31st SOP Order on filing of a monthly update of the timeline for completion of the Phase II operating procedures.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of July 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.



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Exhibit 1