

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

NEPR

Received:

Aug 23, 2021

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**IN RE: INFORMES DE PROGRESO DE
INTERCONEXIÓN DE LA AUTORIDAD
DE ENERGÍA ELÉCTRICA DE PUERTO
RICO**

CASE NO. NEPR-MI-2019-0016

**SUBJECT: Motion to Inform Energy Bureau of
LUMA's Plans and Schedule to Submit
Information Requested during August 16, 2021
Hearing**

**MOTION TO INFORM LUMA'S PLANS AND SCHEDULE TO SUBMIT THE
INFORMATION REQUESTED DURING AUGUST 16, 2021 HEARING**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC and LUMA ENERGY SERVCO, LLC (collectively, LUMA), through the undersigned legal counsel and respectfully state and submit the following:

1. The captioned proceeding involves oversight by this honorable Puerto Rico Energy Bureau ("Energy Bureau") of procedures to handle requests for interconnections of distributed generation systems ("DGs") and microgrids to the Transmission and Distribution System ("T&D System"), pursuant to Acts 57-2014 and 17-2019.

2. During this proceeding, this honorable Energy Bureau has required the Puerto Rico Electric Power Authority ("PREPA"), and now LUMA, to submit quarterly progress reports on interconnections of DGs to the T&D System (*see* Resolution and Order of July 21, 2020).

3. On August 6, 2021, this Energy Bureau issued a Resolution and Order (the "August 6th Order") in the instant proceeding requiring LUMA to appear before the Energy Bureau in a virtual Compliance Hearing scheduled for August 16, 2021 and to submit to the Energy Bureau, on or before August 13, 2021, the presentation to be provided by LUMA during the August 16th

Compliance Hearing regarding LUMA's most recent Interconnection Progress Report and a compliance plan or strategy with respect to the backlog of distributed generation interconnection requests accumulated in previous quarters or months. *See* Energy Bureau's Resolution and Order issued on August 6, 2021 in the instant proceeding ("August 6th Order").

4. As per the August 6th Order, on August 13, 2021, LUMA filed a motion with this Energy Bureau submitting the presentation to be provided by LUMA during the August 16th Hearing (the "Presentation") and explaining that the requested compliance plan or strategy was included in the Presentation. *See* LUMA's "Moción para Presentar Informe de Progreso de Interconexión, Presentación a Utilizarse en la Vista del 16 de agosto de 2021 y Plan o Estrategia para Atender el *Backlog*" dated August 13, 2021.

5. During the August 16th Compliance Hearing, LUMA gave the Presentation and addressed comments and questions from this honorable Energy Bureau. During the proceeding, the Energy Bureau verbally requested LUMA to submit to the Energy Bureau the following documents or information: (1) a detailed plan to address both the backlog of distributed DG interconnection requests to the T&D System and the handling of these requests in the steady state; (2) a list of feeders requiring supplemental studies; (3) a list of documents related to DG interconnection requests that can be handled electronically; (4) a checklist of documents to be submitted by interconnection applicants to the electronic portal for basic and technical validation; and (5) personnel available to perform supplemental studies and certify feeders.

6. LUMA would like to inform this Energy Bureau that it has organized efforts to diligently address the mentioned requests for documents and information made by this Energy Bureau and anticipates it will have all requests, with the exception of the plan for the handling of requests in the steady state (item 1 of paragraph 5), ready for submittal to this Energy Bureau by

August 31, 2021. LUMA will file the plan for handling requests in the steady state by September 20, when the plan is complete. LUMA therefore respectfully requests this Energy Bureau to take notice of the foregoing and allow LUMA until the mentioned dates to submit the mentioned documents and information.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and allow LUMA until August 31, 2021 to submit the documents and information requested by this Energy Bureau during the August 16th Compliance Hearing in the instant proceeding as explained in this Motion and until September 20, 2021 to file the plan for handling requests in the steady state

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd of August, 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. Notice will also be sent to the Office of the Independent Consumer Protection Office, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov and to counsel for the Puerto Rico Solar Energy Industries Association Corp. (“SESA”), javrua@sesapr.org.



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