

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

**NEPR**

**Received:**

**Aug 19, 2021**

**8:30 PM**

IN RE: REVIEW OF LUMA'S MODEL BILL

**CASE NO. NEPR-MI-2021-0008**

SUBJECT: Submittal of Revised Exhibit 2 of Revised Petition as Per Energy Bureau's Request During Second Virtual Technical Conference of August 11, 2021

**MOTION TO SUBMIT REVISED EXHIBIT 2 OF REVISED PETITION AS PER  
ENERGY BUREAU'S REQUESTS DURING SECOND VIRTUAL TECHNICAL  
CONFERENCE OF AUGUST 11, 2021**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy, LLC** ("ManagementCo")<sup>1</sup>, and **LUMA Energy ServCo, LLC** ("ServCo")<sup>2</sup>, (jointly referred to as "LUMA"), and respectfully submit and request the following:

Pursuant to the Puerto Rico Energy Bureau's ("Energy Bureau") Resolution and Order of July 22, 2021 in the referenced proceeding (the "July 22 Order"), on July 28, 2021, LUMA submitted to this Energy Bureau a "Revised Petition for Approval of LUMA's Model Customer Bill and Submitting Revised Model Bill and Supporting Documentation" ("Revised Petition"), which included a revised proposed LUMA model bill, in English and Spanish versions, attached to the Revised Petition as Exhibit 1 ("Exhibit 1" or "Revised Model Bill"), an Excel spreadsheet detailing the charges that will be included in the customer bills per class based on the different rates, attached as Exhibit 2 to the Revised Petition ("Exhibit 2"), and an illustrated comparison between LUMA's proposed Model Bill and PREPA's current bill attached to the Revised Petition

---

<sup>1</sup> Register No. 439372.

<sup>2</sup> Register No. 439373.

as Exhibit 3 (“Exhibit 3”). In addition, the Revised Petition included a document discussing LUMA’s responses to the comments received during the first virtual technical conference held in this proceeding on July 20, 2021, titled “Clarifying discussion on key topics of LUMA’s Revised Model Bill”, included as Exhibit A to the Revised Petition (“Exhibit A”).

As per the July 22 Order, and a subsequent Resolution from the Energy Bureau of August 6, 2021, a Second Virtual Technical Conference to discuss the Revised Petition was held on August 11, 2021 at 10:00 a.m. which was attended by LUMA representatives. During the Second Virtual Technical Conference, this Energy Bureau provided LUMA until August 15<sup>th</sup> to provide revised Exhibits 1 and 2 as well as address certain additional information on several subjects related to the Revised Petition in light of questions and requests made by this Energy Bureau during such conference. In attention to this Energy Bureau’s request, on August 15, 2021, LUMA submitted to this Energy Bureau a “Motion to Submit Revised Exhibits to Revised Petition and Additional Information As Per Energy Bureau’s Requests During Second Virtual Technical Conference of August 11, 2021” (“August 15<sup>th</sup> Motion”), wherein it submitted a revised Exhibit 1 and additional documents and information to address the Bureau’s questions or comments. Regarding the revised Exhibit 2, LUMA indicated in the August 15<sup>th</sup> Motion that it was still in the process of revising the nomenclature in this Exhibit and had been unable to complete this task in the limited time frame provided and, similarly, since it was in the process of updating this Exhibit and given its length, it had also been unable to complete a Spanish version within such limited time frame. As a result, LUMA requested this honorable Energy Bureau an additional time of three (3) days to complete and submit the revised Exhibit 2 in English and Spanish.

In accordance with the August 5<sup>th</sup> Motion, LUMA hereby submits a revised Exhibit 2 (“Updated Exhibit 2”) in the form of an Excel table. The Updated Exhibit 2 includes in a single

Excel file both the English and Spanish versions of this Exhibit. The Updated Exhibit 2 uses the nomenclature used in the existing PREPA bill which is materially consistent with the PREPA Tariff Book approved on May 28, 2019<sup>3</sup>, as well as incorporates additional changes to the English names to better align with the names in the Tariff Book.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau take notice of the above and accept the Updated Exhibit 2 attached to this Motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 19<sup>th</sup> day of August 2021.

I hereby certify that I filed this Petition 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](mailto:jmarrero@diazvaz.law); and Katuska Bolaños-Lugo, [kbolanos@diazvaz.law](mailto: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](mailto:hrivera@jrsp.pr.gov).



**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/ Laura T. Rozas  
Laura T. Rozas  
RUA Núm. 10,398  
[laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com)

---

<sup>3</sup> See *In Re Puerto Rico Electric Power Authority Rate Review*, Cae No. CEPR-AP-2015-0001 and case No. NEPR-AP-2018-0003.

**Updated Exhibit 2**

*Excel Table to be Submitted by Email*