

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

NEPR

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IN RE:

IN RE: INTERRUPCIÓN DE SERVICIO
ELÉCTRICO DE 10 DE JUNIO DE 2021

CASE NO. NEPR-IN-2021-0002

**SUBJECT: Request for Brief Extension of Time to
Comply with Resolution and order of August 13,
2021 (“August 13th Order”).**

**REQUEST FOR BRIEF EXTENSION OF TIME TO COMPLY WITH AUGUST 13TH
ORDER ON JUNE 10TH INCIDENT INVESTIGATION**

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. On June 11, 2021, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order (“June 11th Order”) whereby it initiated a confidential investigation on the incident that took place on June 10, 2021 at the Monacillos substation in San Juan that involved outages in certain areas of Puerto Rico (hereinafter, “the June 10th Incident”).

2. On July 30, 2021, LUMA file a *Motion Submitting Report on June 10th Incident and Request for Confidential Treatment* (“July 30th Motion”). The July 30th Motion included as Exhibit 1 a confidential report entitled “Analysis for Monacillos Fault Event on 6/10/21” (“Monacillos Report”). LUMA also submitted via email a confidential SCADA Data Report. *See* Exhibit 2 to the July 30th Motion (excel spreadsheet). Finally, LUMA submitted a confidential video of the June 10th Incident. *See* Exhibit 3 filed in person in a USB drive.

3. On August 13, 2021, the Energy Bureau directed that the aforementioned submissions shall be afforded confidential treatment as Critical Energy Infrastructure Information (CEII). *See* August 13th Order at page 3. This Energy Bureau also directed that by September 8, 2021, LUMA should file a summary of the Monacillo Report that was filed on July 30, 2021 which will be published when this investigation concludes and that on even date, LUMA shall file a final Monacillo Report. *Id.* The Energy Bureau stated that it may extend the time to file the final Monacillo Report for just cause. *Id.*

4. LUMA officers have and continue to work on complying with that portion of the August 13th Order that requires filing a final Monacillo Report and on a summary of the Monacillo Report that was filed on July 30th. To wit, LUMA personnel in charge of operations and system security, as well as personnel assigned to regulatory compliance, have completed an initial draft of the final Monacillo Report and are working on the English-language summary of the July 30th Monacillo Report. Several internal meetings have been held to discuss the initial drafts. Those diligences involve different components of LUMA's operations.

5. LUMA has been earnestly working to comply with the August 13th Order by September 8, 2021. However, additional analysis and drafting is needed to submit a correct and comprehensive final report that will aid the Energy Bureau in its investigation. Particularly, additional time is needed to complete analysis of data involving the Ecoeléctrica and AES plants and a summary of the July 30th Monacillo Report that does not disclose confidential information and CEII to safeguard the integrity and safety of the Transmission and Distribution System. It is estimated that LUMA will need five additional business days, until September 15, 2021, to comply with the August 13th Order.

6. LUMA holds in high regard its duty to comply with the orders issued by the Energy Bureau in this and other regulatory and adjudicative proceedings. In this proceeding, LUMA has timely complied with the requirements of the Energy Bureau's orders, without need for extensions of time. To wit, the first report was filed on June 14, 2021; less than one business day after the Energy Bureau issued a Resolution and Order on June 11, 2021, opening this investigation. Then, on the July 30th deadline set by the Energy Bureau in a Resolution and Order of June 16, 2021, LUMA filed the Monacillo Report. On this occasion, however, the need to file a fulsome final report justifies the additional time requested herein to allow LUMA personnel to complete analysis of relevant data. Additional time is also needed to complete a summary of the July 30th Report that is informative for the public and at the same time does not reveal confidential information.

7. It bears noting that during the past days, concurrently with working on compliance with the August 13th Order, LUMA has participated in technical conferences on LUMA's Emergency Response Plan, Case No. NEPR-MI-2019-0006 (technical conference held on September 2, 2021), and NEPR-MI-2021-0014 (urgent technical conference held on September 3, 2021 on maintenance a repairs of generation units used by PREPA). Also, LUMA has and is working on several submissions in compliance with orders issued by the Energy Bureau, *see e.g* NEPR-MI-2021-0002 (Ten Year Plan) (request for approvals of Scopes of Works submitted on August 30, 2021); NEPR-MI-2021-0001 (System Operation Principles) (updated Gantt Chart filed September 3, 2021 and updated load forecasting procedures, amendments to System Operation Principles due September 13, 2021, compliance hearing scheduled for September 17, 2021 and filing of presentation for compliance hearing due on September 15, 2021); NEPR-MI-2019-0016 (filing of plan to manage interconnections and of information requested by the Energy Bureau, due

September 13, 2021 and compliance hearing set for September 20, 2021); NEPR-MI-2020-0001 (filing of quarterly reconciliation of FCA and PPCA rider factors due September 14, 2021); NEPR-MI-2020-0012 (filing of timeline for completion of Wind Study due September 15, 2021, technical conference scheduled for September 21, 2021 and presentation for technical conference due September 17, 2021); and responses to four discovery requests issued in Case No. NEPR-AP-2020-0025 (due September 10 and 13, 2021).

8. This request is based on the good faith understanding that the aforementioned regulatory workload, the need to further analyze data involving the Ecoeléctrica and AES plants, as well as the fact that preparation of a summary of the Monacillo Report demands protection of confidential data, provide justifiable cause for a brief extension of five business days, until September 15, 2021, to comply with the August 13th Order.

9. This request is submitted in good faith without intent to delay proceedings.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** LUMA five additional business days until September 15, 2021, to comply with the August 13th Order, including submission of the final Monacillo Report and a summary of the Monacillo Report that was filed on July 30th, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of September 2021.

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



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