

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

NEPR Received: Sep 29, 2021 2:12 PM
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IN RE:

WIND DEVELOPMENT STUDY

CASE NO.: NEPR-MI-2021-0015

SUBJECT: Request for Agenda.

**MOTION REQUESTING AGENDA FOR VIRTUAL TECHNICAL CONFERENCE
SCHEDULED FOR OCTOBER 1, 2021**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW LUMA Energy ServCo, LLC (“LUMA”), through the undersigned legal counsel, and respectfully submits and requests the following:

On July 23, 2021, this Energy Bureau issued a Resolution and Order (“July 23 Order”) ordering PREPA and LUMA to: (i) file on or before September 15, 2021 a Gantt Chart (meeting the requirements specified therein) with the timeline for completion of an offshore wind study required under this Energy Bureau’s Final Resolution and Order approving the Integrated Resources Plan and Modified Action Plan¹ (“August 24 IRP Order”) (this study, the “Wind Study”) and gathering of the information required in the August 24 IRP Order; (ii) attend a Virtual Technical Conference on September 21, 2021 (“September 21 Virtual Technical Conference”) to make a presentation on the steps to achieve timely compliance with the relevant parts of the August 24 IRP Order; (iii) file on or before September 17, 2021 a PDF copy of the presentation to be made

¹ See Final Resolution and Order on the Puerto Rico Electric Power Authority’s Integrated Resource Plan, *In Re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001, August 24, 2020.

during the September 21 Virtual Technical Conference; and (iv) ensure PREPA and LUMA representatives and relevant consultants attend the September 21 Virtual Technical Conference and are prepared to answer questions from the Energy Bureau staff and consultants. *See* July 23 Order on page 2.

On September 10, 2021, PREPA and LUMA filed with this Energy Bureau a Joint Motion requesting the Energy Bureau to clarify the July 23 Order to provide that the requirements related to the Wind Study set forth therein are to be implemented by LUMA. On September 15, 2021, the Energy Bureau issued a Resolution and Order clarifying that “LUMA is responsible for complying with implementing all required activities related to the Wind Study before the Energy Bureau.” *See* Resolution and Order of September 15, 2021, Case No. NEPR-MI-2020-0001 at page 2. The Energy Bureau also rescheduled the technical conference for October 1, 2021, and instructed LUMA to submit the Gantt Chart showing the timeline for completing the study on or before noon on Friday, September 24, 2021, and the presentation for the technical conference by September 28, 2021. *See id.*

On September 17, 2021, this Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2020-0012, determining that it was beneficial and appropriate to evaluate the development of the Wind Study under a separate docket, thus initiating the instant proceeding.

In compliance with the above-mentioned orders of July 23, 2021, and September 17, 2021, on September 24, 2021, LUMA submitted the Gantt Chart required by the Energy Bureau and the presentation for the technical conference to be held on October 1, 2021.

To ensure LUMA staff and third-party consultants attending the September 21 Virtual Technical Conference are best prepared to address any potential questions or concerns, LUMA

respectfully requests that this honorable Energy Bureau provide more specific input on the matters it is seeking to discuss in the form of an Agenda for such Virtual Technical Conference. This Agenda will also allow LUMA to address this Energy Bureau's desired areas of discussion, inure to a more effective hearing process, and avoid potential additional efforts from LUMA or this honorable Energy Bureau related to addressing post-conference any issues or questions raised during the September 21 Virtual Technical Conference.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and issue an Agenda for the Virtual Technical Conference scheduled for October 1, 2021, in the instant proceeding.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of September, 2021.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this **Motion to the attorneys for PREPA**, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.



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