

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

NEPR Received: Sep 15, 2021 11:37 AM

IN RE:

IN RE: REVIEW OF T&D OPERATOR'S
SYSTEM OPERATION PRINCIPLES

CASE NO. NEPR-MI-2021-0001

**SUBJECT: Motion to Submit Presentation for the
Compliance Hearing Scheduled for September 17,
2021**

**MOTION TO SUBMIT PRESENTATION FOR THE COMPLIANCE HEARING
SCHEDULED FOR SEPTEMBER 17, 2021**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC¹, and LUMA Energy ServCo, LLC², (jointly referred to as "LUMA"), through the undersigned legal counsel and respectfully submit and request the following:

On May 31, 2021, this Energy Bureau issued a Resolution and Order (the "May 31st Order") in the instant proceeding approving LUMA's System Operation Principles ("SOP") with conditions.

On August 25, 2021, this Energy Bureau issued a Resolution and Order (the "August 25th Order") that, among others, scheduled a Compliance Hearing for September 17, 2021 at 9:00 a.m. (the "September 17th Compliance Hearing"). The Energy Bureau also directed that LUMA shall file a copy of the presentation to be made by LUMA at such Compliance Hearing on or before September 15, 2021 at 12:00 p.m. and ensure the relevant LUMA personnel and consultants are "prepared to discuss the elements and timelines proposed in the Gant Chart" submitted by LUMA

¹ Register No. 439372.

² Register No. 439373.

as per the May 31st Order, as subsequently updated, and to answer the questions of the Energy Bureau and its staff. *See* August 25th Order at pages 6-7.

On September 13, 2021, LUMA filed a motion with the Energy Bureau addressing certain provisions of the August 25th Order and requesting an agenda for the September 17th Compliance Hearing to ensure LUMA staff attending this hearing are best prepared to address any potential Energy Bureau questions or concerns and allow LUMA to prepare a more responsive presentation for this hearing. LUMA has not received yet an Agenda.

In compliance with the August 25th Order, and without the benefit of an Agenda, LUMA hereby submits, as **Exhibit 1**, copy of the presentation it proposes to give at the September 17th Compliance Hearing, in pdf format.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and accept the attached Presentation in **Exhibit 1** to be provided by LUMA in the Compliance Hearing scheduled for September 17, 2021 in compliance with this Energy Bureau's August 25th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of September, 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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/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA NÚM. 16,266

Exhibit 1

LUMA's Presentation for September 17th Compliance Hearing



System Operation Principles Compliance Hearing September 17, 2021

NEPR-MI-2021-0001



Agenda

- Principle and Procedure Definitions
- Revised Section 5.1 and 5.2
- Load Forecasting Procedure



Principle and Procedure Definitions

- Precise and consistent use of the appropriate definition of principles and procedures for a utility is important for its day-to-day operations and for communication between different units within LUMA and with external stakeholders
- Going forward, LUMA will adopt the meanings for principle and procedure as defined by the International Organization for Standardization (ISO 9001)

Term	Definitions from ISO 9001 (International Organization for Standardization)	Example from the SOP Section 2.1 Table 2.1
Principle	A principle is a basic belief, theory or rule that has a major influence on the way in which something is done.	Document that reflects policy and objectives including: <ul style="list-style-type: none"> • Safety and Reliability • Cost Effective Operations • Non-Discriminatory Behavior
Procedure	A procedure is a specified way to carry out an activity or a process	<ul style="list-style-type: none"> • Defines how SOP are implemented to ensure consistency across System • Provides basis to assess potential process improvements

Revised Section 5.1 and 5.2

- LUMA recognizes the objective of increasing utilization of demand-side resources to support system stability and to increase resilience
- Development of integration capabilities of demand-side resources is a key improvement for system operations and will be instrumental in developing least cost solutions for customers
- LUMA made changes in Section 5 Energy Dispatch of the SOP to address ordered revisions. LUMA would like to learn more regarding what additional language and terminology would address the Energy Bureau's requirements

Load Forecasting Procedure

Day-Ahead and Seven-Day Load Forecasting

- The Load Forecasting procedure being completed as part of the SOP Procedures is focused on the day-ahead, and seven-day time frame
- This is the primary area of focus of Systems Operations and has been among LUMA's highest priorities since beginning operations

Holistic, Company-wide Load Forecasting

- The broader, holistic and company-wide load forecasting process within LUMA is a separate effort
- These long-term and companywide load forecasting and research processes and procedures, which would incorporate power meter load data, load management, DER adoption models and weather normalization and peak allocation, are broad in scope, complex in nature, and require collaboration across several key stakeholders and organizational teams
- While incremental improvements will be incorporated when ready, we anticipate that completion of this exercise to industry standards and to enable quality future regulatory filings (including the future IRP and rate filings) will take years, not days or months

LUMA

Thank you

