

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

NEPR
Received:
Sep 16, 2021
4:54 PM

IN RE:

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

CASE NO. NEPR-MI-2021-0001

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

**MOTION TO SUBMIT UPDATED 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 September 15, 2021, LUMA submitted to this Puerto Rico Energy Bureau ("Energy Bureau") a copy of the presentation to be made by LUMA at the Compliance Hearing scheduled by the Energy Bureau in the instant proceeding for September 17, 2021 at 9:00 a.m. (the "September 17th Compliance Hearing"), in compliance with the Resolution and Order from this Energy Bureau of August 25, 2021 (the "August 25th Order"). See LUMA's *Motion to Submit Presentation for the Compliance Hearing Scheduled for September 17, 2021*.

LUMA hereby submits, as **Exhibit 1**, an updated presentation for the September 17th Compliance Hearing with a revision to acknowledge that the presentation agenda includes the discussion of topics included in the August 25th Order.

¹ Register No. 439372.

² Register No. 439373.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and accept the updated Presentation in **Exhibit 1** to be provided by LUMA in the Compliance Hearing scheduled for September 17, 2021, in substitution of the Presentation submitted to the Energy Bureau on September 15, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th 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 Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.



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Exhibit 1

LUMA's Updated 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
- Topics from August 25th Resolution and Order



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

