

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

NEPR Received: Sep 10, 2021 1:50 PM
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IN RE:

IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY'S PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Urgent Request for Brief Extension of Time
to File FCA, PPCA and FOS Quarterly Reconciliations
and Proposed Factors.**

**URGENT REQUEST FOR BRIEF EXTENSION OF TIME TO SUBMIT FCA, PPCA
AND FOS QUARTERLY RECONCILIATIONS AND PROPOSED FACTORS**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES now **LUMA Energy ServCo, LLC** ("LUMA"), through the undersigned counsel, and respectfully states and requests the following:

1. In a Resolution and Order issued on June 29, 2021, this Energy Bureau set the FCA, PPCA and FOS factors to be applicable from July 1, 2021 until September 30, 2021 ("June 29th Order"). In the June 29th Order, the Energy Bureau also directed that on or before September 14, 2021, LUMA shall file the FCA, PPC and FOS reconciliations for the months of March, April and May, 2021, and the proposed factors to be applied starting on October 1, 2021.¹
2. Exercising its role and duties over system regulatory matters pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("OMA") as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement, LUMA has been preparing the quarterly reconciliations for

¹ In a Resolution and Order of August 31, 2021, the Energy Bureau directed that in the quarterly filing due September 14, 2021, LUMA shall correct certain errors in fuel reports for the months of June and July 2021 that were submitted to the Energy Bureau on August 13, 2021 and August 26, 2021, as part of monthly submissions on reconciliations due to monthly variances.

the months of June through August, 2021, and the proposed factors for the FCA, PPCA and FOS riders to be applied from October 1, 2021 until December 31, 2021.

3. It is respectfully submitted that despite its better efforts and cooperation with personnel from the Puerto Rico Electric Power Authority (PREPA) in charge of providing information related to fuel costs and purchased power costs, LUMA needs a brief extension of two business days to responsibly file the quarterly reconciliation and proposed factors for the FCA, PPCA and FOS riders to be applied starting on October 1, 2021.
4. LUMA needs two additional business day to complete its analysis of the underlying relevant data, finalize calculations and prepare the exhibits that will be filed with the Energy Bureau both in public and confidential formats. Particularly, additional time will be needed to calibrate the numbers and calculations for all three months. As the Energy Bureau is aware, the June through August, 2021 quarter presented variances between forecasted fuel purchase costs and actual costs. Given those circumstances, the upcoming filing of proposed factors and prior period reconciliations will benefit from this brief extension that will allow LUMA to carefully review the necessary calculations to avoid and reduce human errors.
5. LUMA respectfully requests until end of day of September 16, 2021, to file the quarterly reconciliation and proposed FCA, PPCA and FOS factors.
6. LUMA continues to work with its officials and employees to analyze the supporting data and conduct the necessary calculations to file the reconciliations and proposed factors with this honorable Energy Bureau.

7. This request for extension is filed in good faith, without intent to delay the Energy Bureau's processes to conduct the quarterly reconciliations and fix the proposed factors for the FCA, PPCA and FOS riders that will apply starting on October 1, 2021.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** this request for extension of time until end of day of September 16, 2021, to file the FCA, PPCA and FOS reconciliations for the months of June, July, and August 2021, and the proposed factors to be in force from October 1, 2021 until December 31, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10^h 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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