

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

NEPR

Received:

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**IN RE: DESPLIEGUE DE
INFRAESTRUCTURA DE CARGADORES
PARA VEHICULOS ELECTRICOS**

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Request for Extension of Time to Submit
Written Comments**

REQUEST FOR EXTENSION OF TIME TO SUBMIT WRITTEN COMMENTS

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES now **LUMA Energy ServCo, LLC** (“LUMA”), through the undersigned legal counsel, and respectfully state and request the following:

1. On August 26, 2021, this Puerto Rico Energy Bureau (the “Energy Bureau”) issued a Resolution (the “August 26 Resolution”) indicating that it “deemed necessary and prudent to examine the necessary requirements to promote the efficient and orderly deployment of charging infrastructure for electric vehicles, to promote and facilitate their proliferation in Puerto Rico” and commencing a proceeding to evaluate matters related to such deployment. *See* August 26 Resolution at p. 1 (translation ours). The Energy Bureau further indicated that it deemed convenient to obtain the input of the various interest groups in the energy sector and parties interested in topics related to the use of electric vehicles. *See id.* at p. 2. To that effect, this Energy Bureau scheduled a virtual Workshop of Interested Parties for September 23, 2021 at 10:00 a.m. to “commence the dialogue on the tendencies for the adoption of electric vehicles and to promote the deployment of the necessary infrastructure.” *See id.* (translation ours.)

2. In the August 26 Resolution, the Energy Bureau also provided interested parties until October 7, 2021 to submit their comments in writing. *See id.* at p. 3.

3. On September 23, 2021, the Energy Bureau held the mentioned virtual Workshop of Interested Parties wherein LUMA participated, among other interested parties.

4. During the Workshop of Interested Parties, this Energy Bureau sought input on and/or deponents discussed various topics, including: location of charging stations, grid connectivity/capacity issues, ownership of charging stations by the utility, impact of zoning requirements on location of charging stations, whether net metering should be used, charging stations' billing structure, tariff structure for charging in residences, future chargers' technology requirements, incentives for electric vehicle use, and economic benefits, among others.

5. In light of the questions or subjects raised by the Energy Bureau and deponents during the Workshop for Interested Parties, LUMA has additional comments it would like to provide to this Energy Bureau that will provide constructive feedback and further inform on some of these various subjects inuring to a more comprehensive record on this matter. Given the variety of topics and their complexity and the significant impact the deployment of the mentioned infrastructure may have on the transmission and distribution system, LUMA is consulting its subject matter experts and conducting additional analyses to address these subjects in a manner that will be of great benefit to the Energy Bureau in its consideration of the future regulatory framework for electric vehicle charging infrastructure. In order to complete this exercise, however, LUMA needs additional time to submit written comments beyond the deadline of October 7, 2021 indicated in the August 26 Resolution.

6. LUMA is therefore requesting an extension of thirty (30) days to submit its written comments in this proceeding, which LUMA respectfully submits should also apply to other stakeholders and interested parties in this proceeding. LUMA understands that this extension would be sufficient to allow it to prepare more robust comments on the subjects raised during the instant proceeding contributing to a more complete record.

7. Given that this proceeding may lead to an entirely new regulatory framework for Puerto Rico, with potential interdependencies with other proceedings, such an innovative and impactful framework for Puerto Rico requires a profound and measured analysis by all stakeholders. We respectfully submit that not granting an extension may result in limiting the participation of stakeholders and result in a body of comments that would not be constructive or comprehensive enough to allow this Honorable Energy Bureau to properly evaluate the key subjects or issues that have been raised in this proceeding.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** this request for extension of the comment period established by this Energy Bureau in its August 26 Resolution in the referenced proceeding of an additional thirty (30) days to expire on November 6, 2021.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of October 2021.

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



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