

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

NEPR

Received:

Nov 23, 2021

12:23 PM

IN RE:

IN RE: INTERRUPCIÓN DE SERVICIO
ELÉCTRICO DE 10 DE JUNIO DE 2021

CASE NO. NEPR-IN-2021-0002

**SUBJECT: Urgent Request for Brief Extension of
Time to Comply with Resolution and Order of
November 16, 2021.**

**URGENT REQUEST FOR EXTENSION OF TIME TO COMPLY WITH NOVEMBER
16TH RESOLUTION AND ORDER ON JUNE 10TH INCIDENT INVESTIGATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW LUMA Energy ServCo, LLC (“ServCo”), (“LUMA”), and respectfully states and requests the following:

1. On June 11, 2021, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order whereby it initiated a confidential investigation on the incident that took place on June 10, 2021 at the Monacillos substation in San Juan. The incident involved outages in several regions of Puerto Rico (hereinafter, “the June 10th Incident”).

2. On November 16, 2021, the Energy Bureau issued a Resolution and Order (“November 16th Order”) in which among others, and in what is relevant portion, ordered LUMA to provide comments on or before November 23, 2021, to a document entitled *Analytical Comments on the LUMA Energy Report on the Major Blackout of June 10, 2021* (“Analytical Comments”), that was filed by Engineer Carlos H. Díaz-Rivera’s (“Eng. Díaz-Rivera”). The Analytical Comments include a *Monofilar* diagram of the Monacillos transmission center

(“MTC”) which the Energy Bureau designated as confidential Critical Energy Infrastructure Information.

3. The Analytical Comments filed by Eng. Díaz-Rivera contain an interpretation and portrayal of the causes of the June 10th Incident, a rendition of facts that Eng. Díaz-Rivera argues led to the outages in several regions of Puerto Rico, and comments on how an investigation of the incident should develop. Also, they include statements on a prior outage event that occurred in the year 2016 at a time when LUMA did not operate the Transmission and Distribution System. Finally, the Analytical Comments include six conclusions. Accordingly, LUMA’s response to the Analytical Comments requires that LUMA personnel invest considerable time in studying the facts, inferences, conclusions and arguments of Eng. Díaz-Rivera. That is a time-consuming endeavor that could not reasonably be concluded in the five business days that the Energy Bureau fixed in the November 16th Order.

4. It is important to note that during the past week, LUMA prepared for and participated in a compliance hearing held on interconnections, Case No. NEPR-MI-2019-0016 and in a technical conference on the Puerto Rico Test for Demand Response and Energy Efficiency, Case No. NEPR-MI-2021-0009, both held on November 18, 2021. Furthermore, on November 17, 2021, LUMA submitted its *Analysis for Outage Event of August 22, 2021*, Case No. NEPR-IN-2021-0003 and a report on balance owed by agencies, public corporations and municipalities, C Case No. NEPR-IN-2021-0004. On November 20, 2021, LUMA filed comments on the proposed regulation Regarding of the Renewable Energy Certificate Market and Compliance with the Puerto Rico Renewable Energy Portfolio. Finally, LUMA has been working on reviewing the

pre-filed testimonies submitted by intervenors in Case No. NEPR-AP-2020-0025 to issue discovery requests.

5. LUMA needs an extension of time until December 10, 2021, to file with this Energy Bureau responses to the Analytical Comments prepared by Eng. Díaz-Rivera regarding the June 10th Incident. LUMA needs this additional time to analyze the Analytical Comments and draft valuable comments to aid the Energy Bureau in its investigation. Also, the upcoming Thanksgiving holiday observed by LUMA personnel, will delay efforts to complete responses to the Analytical Comments.

6. This request is based on the good faith understanding that the aforementioned regulatory workload and the need to further analyze the Analytical Comments provide justifiable cause for an extension until December 10, 2021, to comply with the November 16th Order.

7. LUMA holds in high regard its duty to comply with the orders issued by the Energy Bureau. On this occasion, however, LUMA needs additional time to analyze and draft correct and comprehensive responses to the Analytical Comments.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the above and **grant** LUMA until December 10, 2021, to comply with the November 16th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of November 2021.

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



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