

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

**NEPR**

**Received:**

**Dec 3, 2021**

**7:32 PM**

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

**CASE NO. NEPR-MI-2021-0001**

**SUBJECT: Submission of Update  
Timeline for Completion of Phase II  
Operating Procedures**

**MOTION SUBMITTING UPDATED TIMELINE FOR COMPLETION OF PHASE II  
OPERATING PROCEDURES**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and submit the following:

1. On May 31, 2021, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued and published a Resolution and Order approving LUMA’s proposed System Operation Principles with conditions (“May 31st SOP Resolution and Order”).
2. In the May 31<sup>st</sup> SOP Resolution and Order, paragraph 1, the Energy Bureau required that LUMA provide “a detailed updated timeline for the completion of any other procedure, protocol, manual or document necessary for the operation of the system in accordance with prudent industry practices, standards and local laws and regulations, including but not limited to the draft procedures filed on May 19, 2021.” *See* May 31<sup>st</sup> SOP Resolution and Order at pages 13-14. The Energy Bureau directed that starting July 5, 2021, LUMA shall provide monthly updates of the timeline. *Id.*, paragraph 4, at page 14.
3. On June 22, 2021, LUMA filed a “Request for Clarifications and/or Reconsideration of May 31<sup>st</sup> Resolution and Order Approving LUMA’s System Operation Principles” (“June

22<sup>nd</sup> Request for Clarifications”). Among others, LUMA requested that the Energy Bureau reconsider that portion of the May 31<sup>st</sup> SOP Resolution and Order that required that LUMA file monthly updates of the timeline for completion of Phase II operating procedures. *See* June 22<sup>nd</sup> Request for Clarifications at page 14.

4. On July 6, 2021, and August 6, 2021, LUMA filed with the Energy Bureau, monthly updates to the Gantt Chart with the status of the Phase II operating procedures. *See* Motion Submitting Updated Timeline for Completion of Phase II Operating Procedures, filed July 6, 2021, and Motion Submitting Updated Timeline for Completion of Phase II Operating Procedures filed August 6, 2021.
5. On August 25, 2021, this Energy Bureau adjudicated LUMA’s June 22<sup>nd</sup> Request for Clarifications and determined that LUMA shall continue to submit monthly updates of the Phase II operating procedures in Gantt Chart format. *See* August 25<sup>th</sup> Resolution and Order at page 6.
6. On September 3, 2021, October 5, 2021, and November 5, 2021, LUMA filed with this Energy Bureau updates to the Gantt Chart with the status of the Phase II operating procedures.
7. In compliance with the May 31<sup>st</sup> SOP Resolution and Order and with August 25<sup>th</sup> Resolution and Order, LUMA is submitting today via email, a Gantt Chart with an update as of December 3, 2021, of the status of the Phase II operating procedures. *See* Exhibit 1.

**WHEREFORE,** LUMA respectfully requests that this Bureau **take notice** of the aforementioned, **accept** the updated timeline for completion of the Phase II operating procedures that is submitted as Exhibit 1 to this Motion, and **deem** that LUMA complied with that portion of the May 31<sup>st</sup> SOP Order and the August 25<sup>th</sup> Resolution and Order that requires filing of a monthly update of the timeline for completion of the Phase II operating procedures.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of December 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](mailto:jmarrero@diazvaz.law); and Katuska Bolaños-Lugo, [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law).



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*Exhibit 1*

Gantt Chart to be submitted *via* email