

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

**NEPR**

**Received:**

**Dec 10, 2021**

**8:14 PM**

**IN RE:**

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

**CASE NO. NEPR-IN-2021-0002**

**SUBJECT: Submission in Compliance with  
Resolution and Order of November 16, 2021.**

**MOTION SUBMITTING LUMA’S RESPONSE TO ANALYTICAL COMMENTS IN  
COMPLIANCE WITH NOVEMBER 16<sup>TH</sup> RESOLUTION AND ORDER ON JUNE 10<sup>TH</sup>  
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 July 30, 2021, LUMA filed a *Motion Submitting Report on June 10th Incident and Request for Confidential Treatment* (“July 30th Motion”). The July 30<sup>th</sup> Motion included as Exhibit 1 a confidential report entitled “Analysis for Monacillos Fault Event on 6/10/21” (“Monacillos Report”). LUMA also submitted via email a confidential SCADA Data Report. *See* Exhibit 2 to the July 30<sup>th</sup> Motion (excel spreadsheet). Finally, LUMA submitted a confidential video of the June 10<sup>th</sup> Incident. *See* Exhibit 3 filed in person in a USB drive.

3. In a Resolution and Order issued on August 13, 2021, the Energy Bureau directed that LUMA's submissions of July 30, 2021 shall be afforded confidential treatment as Critical Energy Infrastructure Information (CEII). *See* August 13<sup>th</sup> Order at page 3. This Energy Bureau also directed that LUMA should file a final Monacillos Report. *Id.*

4. On September 15, 2021 LUMA submitted, under seal of confidentiality, a document titled "Addendum to Analysis for Monacillos Fault Event on June 10, 2021" (hereinafter, the "Addendum").

5. On November 16, 2021, the Energy Bureau issued a Resolution and Order ("November 16th Order") in which it designed the Addendum as CEII and determined that it would be kept confidentially after the investigation concludes. This Energy Bureau also 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.

6. On November 23, 2021, LUMA filed an *Urgent Request for Extension of Time to Comply with November 16<sup>th</sup> Resolution and Order on June 10<sup>th</sup> Incident Report* ("LUMA's Request for Extension"), whereby it requested until December 10, 2021 to file its response to the Analytical Comments. In a Resolution and Order dated December 6, 2021, this Honorable Energy Bureau granted LUMA's Request for Extension. Thus, LUMA's response to the Analytical Comments is due on December 10, 2021.

7. As Exhibit 1 to this Motion, LUMA is submitting its Confidential Response to the Analytical Comments Submitted on September 2, 2021.

8. Pursuant to Section 15.10 of Energy Bureau Regulation 8543 on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Proceedings of December 18, 2014, (“Regulation 8543”), the investigative records of the Energy Bureau shall remain confidential. Given that the Response to the Analytical Comments are part and parcel of an ongoing investigation by the Energy Bureau, LUMA submits them under seal of confidentiality. Furthermore, LUMA respectfully submits that its Response to the Analytical Comments should be designated as confidential and protected from disclosure after the investigation on the June 10<sup>th</sup> Incident concludes. This, in alignment with the orders issued by this Energy Bureau on August 13<sup>th</sup> and November 16<sup>th</sup> that granted confidential treatment to the Monacillos Report and the Addendum filed by LUMA.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the above and of LUMA’s Confidential Response to the Analytical Comments that are included as Exhibit 1 to this Motion, **grant** confidential treatment to LUMA’s Response to the Analytical Comments, and **deem** that LUMA complied with the November 16<sup>th</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of December 2021.

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



**DLA Piper (Puerto Rico) LLC**  
500 Calle de la Tanca, Suite 401  
San Juan, PR 00901-1969  
Tel. 787-945-9107  
Fax 939-697-6147

/s/ Margarita Mercado Echegaray  
Margarita Mercado Echegaray  
RUA NÚM. 16,266  
[margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com)

*Exhibit 1*

Submitted under Seal of Confidentiality