

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

NEPR Received: Dec 17, 2021 10:10 PM

IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Urgent Request for Brief Extension of
Time to File December Quarterly Performance
Metrics Report.

**URGENT REQUEST FOR EXTENSION OF TIME TO FILE DECEMBER
QUARTERLY PERFORMANCE METRICS REPORT**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW, LUMA ENERGY SERVCO, LLC (“LUMA”), through the undersigned legal counsel and respectfully states and requests the following:

1. Submission of quarterly reports on specified metrics on the performance of the Puerto Rico Electric Power Authority (“PREPA”), arises under a Resolution and Order issued by this Puerto Rico Energy Bureau (“Energy Bureau”) on May 14, 2019 in this proceeding. Pursuant to a Resolution and Order issued on December 30, 2020, the quarterly performance metrics are due on the 20th day of the month after each quarter closes.
2. Per this Energy Bureau’s Resolution and Order of December 30, 2020, the current deadline to file the Quarterly Performance Metrics Report for the months of September, October and November 2021, is December 20, 2021 (“December Quarterly Performance Metrics Report”).
3. Preparation and review of the December Quarterly Performance Metrics Report requires a multidisciplinary effort by several LUMA teams including ones engaged in operating the

Puerto Rico Transmission and Distribution System as well as providing customer service, among other duties.

4. LUMA has been actively working on the December Quarterly Performance Metrics Report and analyzing the data to be submitted to this Energy Bureau. Despite LUMA's best efforts, it will not be possible to complete the required processes to submit the December Quarterly Performance Metrics Report by December 20, 2021.
5. In good faith, it is understood that internal revisions processes will conclude by Wednesday, December 22, 2021, and that at such date, LUMA will be able to responsibly submit the December Quarterly Performance Metrics Report. Thus, LUMA respectfully requests a brief extension of two (2) business days to submit the December Quarterly Performance Metrics Report.
6. It bears noting that in addition to the multidisciplinary work that LUMA has been conducting to finalize the December Quarterly Performance Metrics Report, LUMA has worked on the following submissions and appearance at a compliance hearing: (a) Quarterly Reconciliation and Calculated FCA, PPCA and FOS Factors, filed on December 16, 2021, Case NEPR-MI-2020-0001 and preparation for technical conference on Quarterly Reconciliation and Calculated FCA, PPCA and FOS Factors to be held on December 22, 2021; (b) Report on Resource Planning Process for Next IRP Cycle and Submittal of Draft RFQ/RFP for IRP Consultant, Case NEPR-MI-2020-0012; (c) appearance at compliance hearing on the Process for the Adoption of Regulation on Distribution Resource Planning, Case NEPR-MI-2019-0011 held on December 13, 2021; (d) Operating Procedures to be filed in Case NEPR-MI-2021-0001 on System Operating Principles; (e) Response to Analytical Comments on June 10th

Incident, Case NEPR-IN-2021-0002 filed on December 9, 2021; (f) Report on potential insurance claims for incremental fuel costs due to load shed events, Case NEPR-MI-2020-0001, filed on December 10, 2021; (g) LUMA's Comments and Suggestions on Puerto Rico Test for Demand Response and Energy Efficiency, Case NEPR-MI-2021-0009, filed on December 13, 2021; (h) discovery in Case NEPR-AP-2021-0025; and (i) confidential governance documents on Physical Security, Case NEPR-MI-2020-0018, filed on December 9, 2021.

7. LUMA respectfully submits that two (2) business days are necessary to finalize and submit the December Quarterly Performance Metrics Report. This brief extension of time is requested in good faith without intent to delay review by this Energy Bureau of the December Quarterly Performance Metrics Report.

WHEREFORE it is respectfully requested that the Energy Bureau **grant** LUMA until December 22, 2021, to submit the December Quarterly Performance Metrics Report.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th 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; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law.



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