

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

NEPR Received: Feb 23, 2022 8:54 AM
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IN RE:
DEMAND RESPONSE PLAN REVIEW,
IMPLEMENTATION, AND MONITORING

CASE NO.: NEPR-MI-2021-0006
SUBJECT: Request for Continuance of
Workshop Scheduled for February 28, 2022

**MOTION FOR CONTINUANCE OF WORKSHOP SCHEDULED FOR
FEBRUARY 28, 2022**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as the “Operator” or “LUMA”), and respectfully state and request the following:

1. On December 10, 2020, the honorable Energy Bureau (“Energy Bureau”) adopted the Regulation for Demand Response. The Regulation entered into effect on January 21, 2021 and requires that the Puerto Rico Electric Power Authority (“PREPA”) or its successor, LUMA, file a Three-Year Demand Response Plan within six months of its effective date.

2. On January 21, 2022, the Energy Bureau published the final version of the Regulation for Energy Efficiency.

3. On February 1, 2022, this Energy Bureau issued a Resolution and Order in which it detailed the actions that follow after approval of the Regulation for Energy Efficiency. Among those actions, the Energy Bureau scheduled a workshop regarding the process to develop and implement the Three-Year Demand Response Plan and its association with the Transition Period Plan pursuant to the Regulation for Energy Efficiency (“February 1st Order”). The Energy Bureau ordered LUMA to attend the workshop scheduled for February 28, 2022, at 10:00 a.m. At the

workshop, LUMA personnel should be prepared to present its current plans for the development and launch of quick-start Energy Efficiency and Demand Response programs and the other activities it is planning to undertake during the Transition Period to facilitate the ramp-up of the programs and development of its workforce.

4. LUMA has designated its representatives to attend the workshop to present the plans and activities requested by this Energy Bureau. They have a vast knowledge of the topics mentioned above and are the ideal persons to testify to comply with the Energy Bureau's February 1st Order. However, due to commitments that cannot be postponed at this time, LUMA representatives will not be able to fully prepare in advance for the workshop on Monday, February 28, 2022. One of the LUMA representatives is currently on leave and thus cannot prepare for the workshop.

5. In view of the foregoing, LUMA respectfully requests that this Energy Bureau continue the workshop scheduled for February 28, 2022.

6. LUMA hereby informs that its representatives are available to attend the Workshop during the week of March 7-11, 2022.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **order** the continuance of the workshop scheduled for February 28, 2022, and **schedule** the workshop for the week of March 7-11, 2022, within the Energy Bureau's discretion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of February 2022.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this **Motion to the attorneys for PREPA**,

Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo,
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