

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

NEPR

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IN RE: THE PERFORMANCE OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO. NEPR-MI-2019-0007

**SUBJECT: LUMA's Request for a Copy of
the Presentation to be Exhibited at the
Technical Conference and the List of
Questions to be Posed by the Energy
Bureau**

**LUMA'S REQUEST FOR A COPY OF THE PRESENTATION TO BE
EXHIBITED AT THE TECHNICAL QUESTIONS AND THE LIST OF QUESTIONS TO
BE POSED BY THE ENERGY BUREAU**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo") (jointly "LUMA"), and respectfully states and request the following:

1. On December 22, 2021, LUMA filed a *Motion Submitting Quarterly Performance Metrics, Request for Amendment to Reporting Schedule on Certain Financial Metrics, Requests for Clarifications, and Request to Substitute a Metric, Exclude Certain Metrics and Rename Certain Metrics* ("December 22nd Submission"). With the December 22nd Submission, LUMA presented the data collected on performance metrics for the September, October, and November months of 2021. Moreover, LUMA renewed a prior request to exclude specific metrics, submitted a proposal for future submissions on financial metrics, requested clarifications, proposed substitute metrics, and requested that the Energy Bureau rename several existing metrics. Finally, LUMA requested that the Energy Bureau delay the reporting on the metric on non-technical losses found to be theft occurrences.

2. On January 5, 2022, LUMA filed a *Request to Stay Portion of Resolution and Order of December 14, 2021, to identify Additional Information and Submit Plan to Produce Information on Specified Metrics, and Request for Extension of Time*. Among other requests, LUMA moved the Energy Bureau to stay in compliance with portions of a Resolution and Order issued on December 14, 2022, that require LUMA to submit additional information and a plan to file reports on the following performance metrics: monthly peak by customer class, monthly peak by district, average time to resolve billing complaints, Number of Customer Complaints appealed by Customer Class and Average Time to Respond to Service and Outage Complaints.

3. On January 21, 2022, LUMA submitted a plan to report on two metrics: Incremental Installed Distribution Generation Capacity per Year - Wind -, and Incremental Number of Distributed Generation Installations per Year -Wind-, commonly referred to as the wind metrics.

4. On January 31, 2022, the Energy Bureau issued a Resolution and Order, whereas it scheduled a Technical Conference for February 24, 2022, at 10:00 a.m. (“January 31st Order”). In the January 31st Order, the Energy Bureau expressed that it had identified a list of comments from the December 22nd Submission as to which it seeks clarification from LUMA. The comments were included as Attachment A to the January 31st Order. The Energy Bureau stated that in the Technical Conference, LUMA and PREPA would have the opportunity to discuss their comments and answer questions from the Energy Bureau. As such, the Energy Bureau instructed LUMA and PREPA to ensure that its representatives are ready to answer under oath any questions the Energy Bureau, its staff, consultants, and Commissioners may have.

5. In order to facilitate a better discussion, LUMA respectfully requests the Energy Bureau clarify if the questions the Energy Bureau plans to pose during the Technical Conference

are limited to the comments identified in Attachment A to the January 31st Order. If any other metrics or topics will be discussed therein. LUMA respectfully requests that the Energy Bureau provide the list of questions or topics to be discussed at the Technical Conference. In either case, LUMA solicits the Energy Bureau to provide on or before February 14, 2022, a copy of the presentation materials its Commissioners, staff and/or consultants plan to exhibit at the Technical Conference. LUMA's petition is made to allow its representatives to prepare for the discussion and ensure LUMA the opportunity to provide meaningful responses.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take** notice of the above and **clarify** if the questions the Energy Bureau plans to pose during the Technical Conference are limited to the comments identified in Attachment A to the January 31st Order. LUMA also respectfully requests that the Energy Bureau **provide** LUMA and **publish** before February 14, 2022, a copy of the presentation materials its Commissioners, staff and/or consultants plan to exhibit at the Technical Conference.

RESPECTFULLY SUBMITTED.

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.

In San Juan, Puerto Rico, this 9th day of February 2022.



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