

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

NEPR Received: Feb 21, 2022 7:04 PM
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IN RE:

PUERTO RICO TEST FOR DEMAND
RESPONSE AND ENERGY EFFICIENCY

CASE NO.: NEPR-MI-2021-0009

SUBJECT: Motion Requesting Extension to Submit
Comments to Presentation Regarding Avoided Cost
Modeling Given by the Energy Bureau Consultants During
Technical Conference Held on February 8, 2022

**MOTION REQUESTING EXTENSION TO SUBMIT COMMENTS TO
PRESENTATION REGARDING AVOIDED COST MODELING GIVEN BY THE
ENERGY BUREAU CONSULTANTS DURING TECHNICAL CONFERENCE HELD
ON FEBRUARY 8, 2022**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC¹, and LUMA Energy ServCo, LLC² (jointly referred to as “LUMA”) and respectfully state, submit and request the following:

1. On December 14, 2021, the Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order (the “December 14th Resolution and Order”) determining to continue the development by the Energy Bureau of an avoided cost study (the “Avoided Cost Study”) to develop the values to be applied to the cost-effectiveness screening framework in this proceeding (the “PR Test”) as originally set forth the Energy Bureau’s Resolution and Order of August 13, 2021. *See* December 14th Resolution and Order at page 1. In addition, the Energy Bureau “reiterated its intention to share the methods and initial results of the Avoided Cost Study and schedule a Technical Conference for that purpose”. *Id.* Accordingly, the Energy Bureau scheduled a virtual Technical Conference for February 8, 2022, at 10:00 a.m. (the “February 8th Technical

¹ Register No. 439372.

² Register No. 439373.

Conference”), “to discuss the initial results of the Avoided Cost Study”, and ordered PREPA and LUMA to attend, as well as invited other stakeholders to attend and participate. *See id.* at page 2.

2. After other procedural events, on February 7, 2022, the Energy Bureau issued a Resolution and Order (the “February 7th Resolution and Order”) proposing to adopt a PR Test framework, as defined in an Attachment A thereof, and a list of prioritized impacts to be included in the application of the PR Test for the Potential Study and the first Three-Year Plan required under Sections 3.02(B) and 4.02 of the Regulation for Energy Efficiency approved January 5, 2022 (the “EE Regulation”), respectively. *See id.* at pages 2-4 and Attachments A and B.³

3. Furthermore, in the February 7th Resolution and Order, this Energy Bureau ordered LUMA to file comments on Attachments A and B on or before March 7, 2022. *See id.* at page 4.

4. In the morning of February 8, 2022, the Energy Bureau sent copy of a presentation titled “Puerto Rico Avoided Cost Modeling Technical Conference” (the “Presentation”) to be provided by the Energy Bureau consultants (Synapse Energy Economics, Inc.) during the February 8th Technical Conference to be held on that same day.

5. Shortly thereafter, the Energy Bureau held the February 8th Technical Conference in which the Energy Bureau consultants provided the Presentation. The Energy Bureau consultants put forward three discussion questions. *See* Presentation at page 46. At the end of the Presentation, the Energy Bureau Consultants informed that stakeholders and LUMA could provide written comments and questions on the Presentation by February 22, 2022. *See id.* at page 48. In addition,

³ The February 7th Resolution and Order also included an Attachment C containing a report with the recommendations submitted by the Energy Bureau’s consultants at the conclusion of the Technical Workshops that have been held in this proceeding. *See id.* at page 2 and Attachment C.

they indicated that the updated avoided energy cost results would be available for public review by March 15, 2022. *See id.*

6. LUMA is actively engaged in the review and analysis of the Presentation and Attachments A and B of the February 7th Resolution and Order and has involved its external consultants in this process. However, the information presented by the Energy Bureau requires various levels of internal review and verifications and necessary coordination with the external consultants. LUMA respectfully submits that the fourteen (14) days provided to review the Presentation (comprised of nine (9) workdays- taking into account a holiday) are insufficient for LUMA to complete this review and prepare a full set of written comments in a thorough and effective manner. LUMA estimates that this effort can be completed by March 7, 2022, when the comments to Attachments A and B are due. Therefore, LUMA respectfully requests that it be provided an extension to submit its comments to the Presentation by March 7, 2022. This extension is minimal because it is limited to nine (9) additional workdays. In addition, it is still ahead of the March 15 deadline set forth by the Energy Bureau consultants to issue the updated avoided energy cost results.

7. Based on the circumstances described above and the importance of LUMA's input on the Avoided Cost Study and PR Test, it is respectfully submitted that the proposed extension to submit comments to the Presentation requested herein is reasonable and will help develop a more complete and robust record in this proceeding.

WHEREFORE, LUMA respectfully requests the Energy Bureau to **take notice** of the aforementioned and **grant** LUMA's request herein by providing an **extension** until **March 7**,

2022, to submit comments to the Presentation provided by the Energy Bureau's consultants during the Technical Conference held on February 8, 2022.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of February 2022.

We certify that we filed this motion using the electronic filing system of the Puerto Rico Energy Bureau and that we will send an electronic copy of this motion to counsel of record for PREPA, Katuska Bolaños-Lugo, kbolanos@diazvaz.law.



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