

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

NEPR Received: Mar 8, 2022 10:26 PM
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IN RE:
DEMAND RESPONSE PLAN REVIEW,
IMPLEMENTATION, AND MONITORING

CASE NO.: NEPR-MI-2021-0006
SUBJECT: Submittal of LUMA’s Presentation
for Workshop Scheduled for March 9, 2022.

**MOTION TO SUBMIT LUMA’S PRESENTATION FOR WORKSHOP SCHEDULED
FOR MARCH 9, 2022**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “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 (“Regulation for DR”), which entered into effect on January 21, 2021¹, requiring, in pertinent part, that the Puerto Rico Electric Power Authority (“PREPA”) or its successor, LUMA, file with the Energy Bureau a Three-Year Demand Response (“DR”) Plan within six months of its effective date. *See* Regulation on DR, Section 3.02(C)(1)(a).

2. On January 21, 2022, the Energy Bureau published the final version of the Regulation for Energy Efficiency (“Regulation for EE”)², which requires, in pertinent part, that PREPA or its successor, LUMA, file with the Energy Bureau a Transition Period Plan covering energy efficiency (“EE”) programs, on or before March 1, 2022. *See* Regulation for EE, Section 2.01(B).

¹ Regulation for DR, December 21, 2020, Regulation 9246.

² Regulation for EE, January 24, 2022, Regulation 9354.

3. On February 1, 2022, this Energy Bureau issued a Resolution and Order (the “February 1st Order”) in which it detailed the actions that directly follow the approval of the Regulation for EE. Among those actions, the Energy Bureau scheduled for February 28, 2022, at 10:00 a.m. a workshop “regarding the process for developing and implementing the Three-Year DR Plan and its association with the Transition Period Plan”. *See* February 1st Order at page 2.³ The Technical Workshop was thereafter rescheduled by this Energy Bureau for March 9, 2022, at 10:00 a.m. (the “March 9th Workshop”). *See* Resolution and Order issued by the Energy Bureau on February 25, 2022.⁴

4. In the February 1st Order, the Energy Bureau indicated that LUMA “should prepare to present, during the workshop, its current plans for the development and launch of quick-start EE and DR programs, as well as the other types of activities it is planning to undertake during the Transition Period to facilitate the ramp-up of the EE and DR programs and development of the EE and DR workforce.” February 1st Order at page 3.

5. LUMA hereby submits to this Energy Bureau a copy of the presentation it will provide during the March 9th Workshop. *See* Exhibit 1.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the attached presentation to be given by LUMA during the Workshop to be held on March 9, 2022.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of March 2022.

³ Among others, the Energy Bureau also extended the filing deadline for both the Three-Year DR Plan and the Transition Period Plan to January 6, 2022.

⁴ This Resolution and Order addressed a *Motion for Continuance of Workshop Scheduled for February 28, 2022* filed by LUMA on February 23, 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, kbolanos@diazvaz.law.



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Exhibit 1

Presentation for March 9, 2022 Workshop



DR and EE Transition Period Planning Workshop

NEPR-MI-2021-0006

March 9, 2022

Agenda

- LUMA's Support for Transformation
- Workshop Objectives
- Overview of Planning Process
 - Establish Objectives
 - Select Transition Programs/Pilots
 - Program Plan Development
 - Transition Period Plan Filing
- Planned Schedule
- Transition Period Plan Status
- Next Steps

LUMA's Support for Transformation

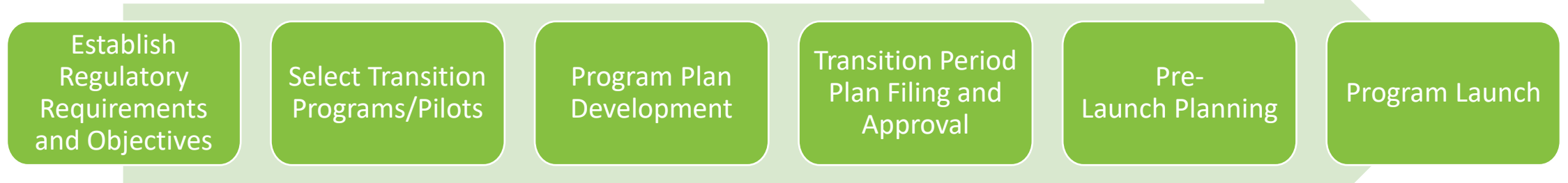
LUMA and our more than 3,000 co-workers are working hard every day to build a more reliable, more resilient a cleaner energy system for the 3.2 million friends, family and neighbors who we are privileged to serve.

- LUMA fully supports the growth of solar and clean energy across Puerto Rico – it's what the Puerto Rican people want, and that is why we are empowering the growth of clean and renewable energy.
- In the past eight months, we have been working closely with the Puerto Rico Energy Bureau to accelerate the adoption of renewable energy to reduce the dependence on imported fuel to generate electricity.
- Our shared goal is to create a future that will put the days of Puerto Rico's dependence on high-cost fuels behind us.
- By working together, we can continue to accelerate the adoption of renewable energy and deliver the energy system the people of Puerto Rico expect and deserve.

Workshop Objectives

- Present LUMA's work plan for developing the Transition Period Plan (TPP) for EE and DR
- Discuss the current status and timeline of LUMA's work plan
- Open discussion to gain feedback from stakeholders

Overview of Planning Process



1. **Establish Regulatory Requirements and Objectives:** Develop plan of work that meets Transition Period Plan (TPP) requirements.
2. **Select Transition Programs/Pilots:** Select most viable quick-launch programs/pilots to meet Transition Period objectives.
3. **Program Plan Development:** Develop program plans using Energy Bureau template, describing program design and implementation strategies.
4. **Transition Period Plan Filing and Approval:** Prepare and file TPP for Energy Bureau approval.
5. **Pre-launch Planning:** Conduct activities necessary for pilot program launch.
6. **Program Launch:** Launch Transition programs/pilots.

Establish Objectives



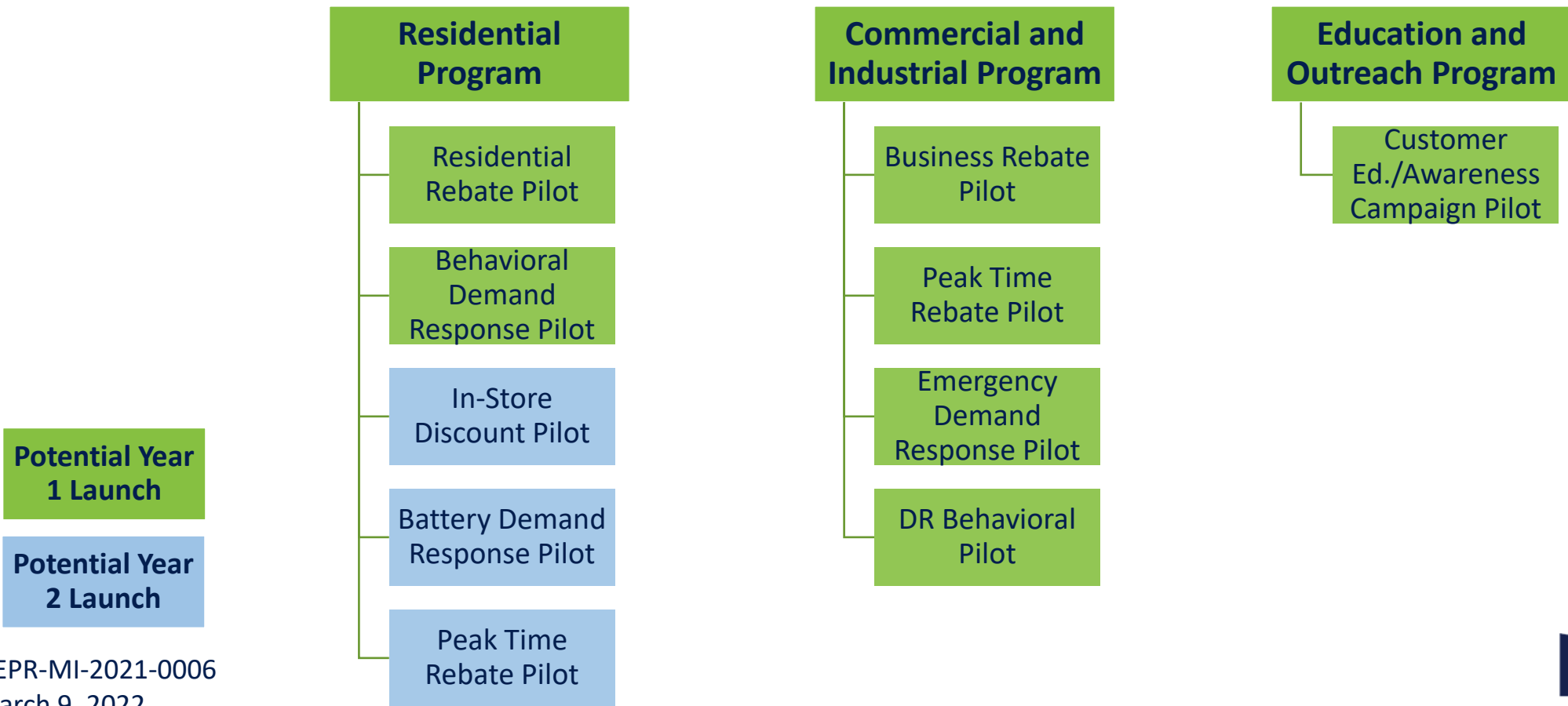
- LUMA reviewed EE Regulation, stakeholder comments, research reports, previous stakeholder workshop meeting notes, articles, and other available materials.
- Information was synthesized into a list of primary Transition Period Objectives to inform program selection.

Category	Primary Transition Period Objectives	Description
Customer	Energy/Bill Savings	Programs that achieve bill savings and/or provide education on savings opportunities
	Ease of Participation	Easy for customers to enroll and participate
	Customer Equity/Access	Provide options for low-income and small business customers
Market / Economic	Contribute to Workforce Development	Provide local jobs, training and/or stimulate economic activity for local companies
	Raise Energy Education and Awareness	Provide information to raise customer awareness of benefits of EE/DR and how to participate
	Fill Gaps in Market	Provide services that are not already being offered by other programs
Regulatory	Cost-effectiveness	Programs that are generally cost-effective
	Quick-Launch Pilot	Pilots available to launch by October
	Savings Potential (scalability)	Pilots that have the potential to scale up and achieve high savings to meet IRP targets
Program Administrator	Timeline/Ease of Implementation	Programs that are not too complex to set up and launch by October
	Market/workforce readiness	Local availability of equipment and/contractors for installation
	Technological Readiness	Requirements for enabling technology
	Stakeholder Considerations	Incorporate stakeholder feedback
	Customer Satisfaction	Programs that are generally well-received by customers

Select Transition Programs/



- LUMA has conducted review of program options to identify those that meet Transition Period objectives.
- Below is LUMA’s recommended portfolio of Transition Period programs/pilots.



Program Plan Development

Establish Objectives

Select Transition Programs/Pilots

Program Plan Development

Transition Period Plan Filing/Approval

Pre-launch Planning

Program Launch

Develop detailed Program Plans, including design parameters and implementation strategies. These will be documented in Energy Bureau's template:

- Program category
- Program description
- Program theory and objectives
- Target customer population
- Barriers
- Measure list
- Incentive/financing strategy
- Marketing strategy
- Estimated program costs
- Program time frame
- Benefits
- Evaluation, Measurement, and Verification (EM&V)

ENERGY EFFICIENCY PROGRAM TRANSITION PLAN
LUMA Education Outreach Pilot

Education Outreach

1.0 Objectives

The LUMA Education Outreach Program is an energy efficiency, multi-media campaign delivered in-house by LUMA with assistance from Guidehouse targeted at LUMA's residential customers which will be designed to:

- Increase alignment with draft energy efficiency regulation
- Contribute to fostering a conservation culture
- Increase customer education and awareness regarding energy efficiency and no-cost, low-cost actions to achieve energy, economic and environmental goals
- Prime the residential market for participation in future LUMA energy efficiency programs
- Build customer trust in LUMA as an energy efficiency advisor

2.0 Program Description

This program provides residential customers with energy efficiency information, nudges and tips for energy efficiency related actions. LUMA will provide regular messaging via LUMA's multi-media channels for customer outreach including social media, Mi LUMA app, LUMA webpage, bill inserts, and other channels. Messaging would focus on:

- Energy Efficiency Tips
- Environmental Objectives
- Puerto Rico Economic Objectives
- Money Savings Advice for Customers

Type

- Prescriptive
- Custom
- Midstream
- Downstream
- Direct Install
- Financing
- Education
- Pilot
- Program

Sector:

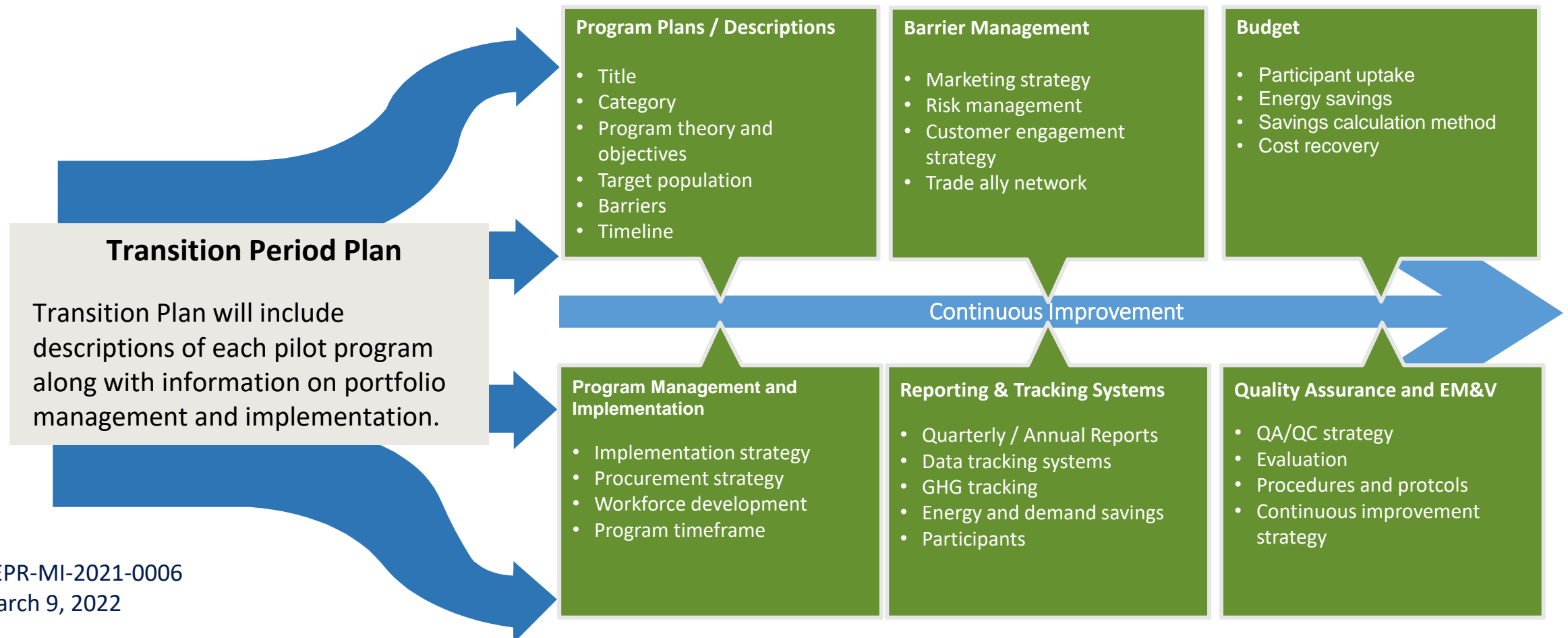
- Residential
 - Single Family
 - Multi-family
- Income Qualified
- Commercial & Industrial
 - Small Business
 - Agriculture
- All Sectors

LUMA

Transition Plan Filing



- LUMA will file an integrated EE and DR Transition Plan for Energy Bureau approval in June 2022.
- TPP will include Transition Programs for EE and for DR within a joint filing to minimize redundancy and present an integrated EE/DR portfolio structure.



Planned Schedule

Task	Description	Status	Feb 2022	Mar 2022	Apr 2022	May 2022	June 2022	July 2022	Aug 2022	Sep 2022	Oct 2022	Nov 2022	Dec 2022
1	Establish Regulatory Requirements and Objectives	In Progress											
2	Select Transition Programs/Pilots	In Progress	■										
3	Develop Program Plans	In Progress											
4	Transition Period Plan Filing and Approval	Not Started					◆ TPP Filing on June 6						
5	Pre-launch Planning	Not Started											
6	Program Launch	Not Started									Program launch		

■ Technical Workshop

◆ Filing

Transition Period Plan Status

G On target
 Y Caution
 R Off plan
 C Complete

Key Activity Summary

Near-term Activities

- Incorporate feedback from planning workshop
- Develop detailed program plans
- Coordinate with external stakeholders

Medium-term Activities

- Begin report preparation using Energy Bureau templates
- File TPP for Energy Bureau approval
- Begin pre-launch implementation planning

Key Milestones for TPP

	Status
Establish Regulatory Requirements and Objectives for TPP	C
Select Transition Programs/Pilots	G
Program/Pilot Plan Development	G
Transition Period Plan Filing and Approval	G
Pre-Launch Planning	G
Program/Pilot Launch	G

Risks / Issues

Risks:

- Forecasting accuracy for program participation and savings

Next Steps

- Incorporate feedback from March 9 technical workshop into TPP planning
- Develop detailed program design and implementation strategies
- Prepare and file TPP



Thank you

