

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

NEPR
Received:
Mar 18, 2022
10:46 AM

IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Motion in Compliance
with Resolution and Order**

MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF MARCH 16, 2022

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and LUMA Energy Servco, LLC (“ServCo”), (jointly, “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On March 15, 2022, LUMA filed with this Energy Bureau a *Motion Submitting Quarterly Reconciliations and FCA, PPCA, and FOS Calculated Factors and Request for Confidential Treatment* (“March 15th Submission”). With the March 15th Submission, LUMA included supporting documentation on the calculated quarterly reconciliations for the Fuel Charge Adjustment (“FCA”) and the Purchased Power Charge Adjustment (“PPCA”) riders and the calculated factors for the FCA, PPCA and Fuel Oil Subsidy (“FOS”) riders to be applied during the period from April 1st until June 30th, 2022.

2. In a Resolution and Order issued on March 16, 2022, with the subject *Appearance for Technical Conference on Proposed Factors for April-May-June 2022 and Determination on Confidentiality* (translation provided) (“March 16th Order”). On pages 1 through 2 of the March 16th Order, this Energy Bureau directed that on or before March 18, 2022, at 10 a.m. LUMA should clarify or file the following information:

- i. An update of the file “PRECIO PONDERADO DIRECTORADO DE GENERACIÓN@ noviembre 30, 2021,” with information up to an including February 28, 2022.
- ii. An update of the file “Precio Ponderado Análisis Revised 2021.11.30,” with information up to an including February 28, 2022.
- iii. A detailed description of the relevance of the file “Precio Ponderado Analisis _ Revised - 2021.11.30.xlsx.” With said description, LUMA shall explain the origins of the information included in cells C10, C11, C24 and C25.
- iv. An estimate of the incremental cost of the use of diesel fuel in Units San Juan 5 and 6, relative to the cost if natural gas had been used, during the months of December 2021, January, and February 2022.
- v. The estimate of the penalties to which Naturgy Aprovevisionamientos, S.A. could be exposed for the breach of its obligation to provide natural gas to the Central Costa Sur for the period of December 1, 2021, to February 28, 2022.
- vi. A detailed description of the methodology used, including worksheets in native format, for the calculation of price estimates of the different types of fuel to be used during the period of April 1, 2022, to June 30, 2022, as detailed in the tab “Attachment 3” (corrida de “PROMOD”) of the file “APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx”.
- vii. The file "APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx" does not contain a tab titled "Attachment 7". In this tab LUMA presents the information related to the correction of the billing problems experienced during the months of June, July and August 2021. According to the documents presented during the reconciliation process that took place in December 2021, LUMA reported that, as of November 30, 2021, it was pending to bill the amount of \$252,989.87 for the FCA clause and \$85,691.32 for the PPCA clause. LUMA indicated that it would invoice these amounts during the quarter from December 2021 to February 2022. However, LUMA did not provide an update of this information. Therefore, LUMA must submit a new file "APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx" containing the aforementioned update. Failing that, LUMA must provide the reasons why such information should not be part of this process.

3. LUMA hereby respectfully submits its responses to items one (1) through three (3) and seven (7) of the March 16th Order. *See* Exhibit 1 (“Permanent Rate Request for Information”).

In support of the responses included in Exhibit 1, LUMA is submitting the following:

- i. Public and Confidential updated versions of the spreadsheets PRECIO PONDERADO DIRECTORADO DE GENERACIÓN@ noviembre 30, 2021,"

and "Precio Ponderado Análisis Revised 2021.11.30," with information up to and including February 28, 2022, and supporting documents and spreadsheets, *see file entitled Inventory 2022.02.08*;

- ii. Exhibit 1 which includes, among others, the explanation requested in item three (3) of the March 16th Order; and
- iii. Public and confidential versions of the file entitled "FCA and PPCA Not Billed Reconciliation.xlsx," that include the updated information on bill corrections and the spreadsheet entitled "APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx," that was updated to reflect the unbilled information.

4. LUMA respectfully informs that upon conferring with the Puerto Rico Electric Power Authority ("PREPA") regarding the information requested in items four (4) through six (6) of the March 16th Order, it was determined that PREPA is the entity in a position to submit the information requested therein that involves calculations by PREPA and information on fuel costs, prices and consumption that is generated by PREPA or under PREPA's control. Thus, under separate cover, PREPA will submit the responses to items four (4) through six (6) of the March 16th Order. *See also* Exhibit 1.

5. LUMA is hereby submitting several spreadsheets submitted in native format (.xls) and with formulae intact that are itemized in the table below. Those spreadsheets include formulae and original calculations that reveal confidential procedures and include sensitive commercial information belonging to LUMA and/or PREPA and that are thus protected by law from disclosure and should not be disclosed in native form. LUMA hereby incorporates by reference the legal argumentation included in Section VIII of the March 15th Submission, and requests that this Energy Bureau accept and maintain confidentially, the spreadsheets that are submitted today in native form

and with formulae intact in the file entitled *Confidential* as they contain protected as trade secrets. They have commercial value to LUMA and PREPA because they reveal confidential processes and analysis to produce calculations in support of the public filings of the quarterly reconciliations and the proposed FCA, PPCA and FOS rider factors. LUMA and PREPA keep and maintain these native files confidentially and do not disclose them to the public nor to unauthorized third parties. In the March 16th Order, this Energy Bureau granted LUMA’s request for confidential treatment of the original versions of the spreadsheets that support the March 15th Submission. LUMA requests that this Energy Bureau apply the same ruling of confidentiality to the revised and updated versions of the confidential spreadsheets and supporting confidential files, that are submitted today with this Energy Bureau.

6. The confidential and public files submitted today are:

A. Confidential Folder

APRIL-JUNE 2022 Factors .xlsx
FCA and PPCA Not Billed Reconciliation.xlsx
File entitled Inventory 2021.11.30¹:
<ul style="list-style-type: none"> ○ Precio Ponderado Analisis _ Revised - 2021.11.30.xlsx ○ Precio Ponderado Directorado de Generación @ noviembre 30, 2021, Revised ○ PRECIO PONDERADO DIRECTORADO DE GENERACION @ noviembre 30, 2021.xlsx
File Entitled Inventory 2022.02.28:
<ul style="list-style-type: none"> ○ PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022.xlsx ○ Precio Ponderado Analisis _ 2022.02.28.xlsx

B. Public Folder, Values

APRIL-JUNE 2022 Factors _ Values.xlsx
FCA and PPCA Not Billed Reconciliation.xlsx

¹ These files included in the file entitled Inventory 2021.11.30, were submitted with the March 15th Submission. They were included in the Confidential file that is submitted with this Motion, in support of LUMA’s response to request #3 and to allow this Energy Bureau to validate the source of the data in Cells C10, C11, C24 and C25, as requested by this Energy Bureau. The values version of the file entitled Inventory 2021.11.30, was submitted on March 15, 2022 and is not being resubmitted today.

File Entitled Inventory 2022.02.28:

- Precio Ponderado Analisis _ 2022.02.28_ Values.xlsx
- PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022.xlsx
- 22-00057 FINAL REPORT END OF MONTH INVENTORY
- 22-00057 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O....pdf
- 22-00058 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O....pdf
- 22-00059 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O....pdf
- CERTIFICADO DE CANTIDAD - INVENTARIO FO @ PREPA PALO SECO SJ.pdf
- Full Report 1310100016545 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M....pdf
- Full Report 1310100016546 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M....pdf
- Full Report 1310100016547 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M....pdf
- Full Report 1310100016548 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M....pdf
- GA022161 PREPA CENTRAL SJ TANK TRUCK GA022166 GA022170 PREPA YABUCOA TANK INVENTORY (Feb 28, 2022).pdf
- PREPA Aguirre Tank Inventory (Feb 28, 2022).PDFINVENTORY (Feb. 28, 2022).pdf

WEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the filing of LUMA's responses to items one (1) through three (3) and seven (7) of the March 16th Order; **grant** the request to keep confidentially the spreadsheets that have been submitted in excel format and with formulae intact in the file entitled *Confidential* that is submitted with this Motion; and **deem** that LUMA complied with the March 16th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of March 2022.

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 counsel for PREPA Katuska

Bolaños-Lugo, kbolanos@diazvaz.law and to the Independent Consumer Protection Office,
through Director Hannia Rivera, hrivera@oipc.pr.com.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA NÚM. 16,266
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Exhibit 1

LUMA's Responses to Mach 16th Order, entitled "Permanent Rate Request for Information"

Permanent Rate Request for Information

NEPR-MI-2020-0001
March 18, 2022

Permanent Rate Progress Report
22.03.16 Resolution and Order Request
Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

1. Provide an updated version of the file "PRECIO PONDERADO DIRECTORADO DE GENERACION @ noviembre 30, 2021.xlsx", with information through February 28, 2022.

Answer:

See file PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022.xlsx included in the Confidential and Values Folders filed on March 18, 2022.

Permanent Rate Progress Report

22.03.16 Resolution and Order Request

Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

2. Provide an updated version of the file "Precio Ponderado Analisis 2021.11.30 -NEPR-MI-2020-0001.xlsx", with information through February 28, 2022

Answer:

Please see *Precio Ponderado Analisis _ 2022.02.28.xls* in the Confidential and Values Folders filed on March 18, 2022. The file was updated using the February 28th storage audit and the file *PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022.xlsx* provided by PREPA. The Confidential folder contains the folder Inventory 2022.02.28 in which LUMA included the files listed below:

1. PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022
2. Precio Ponderado Análisis 2022.02.28

Additionally, the following files have been submitted in the "Inventory 2022.02.28" folder within the Values folder.

1. Precio Ponderado Analisis 2022.02.28_Values.xlsx
2. PRECIO PONDERADO DIRECTORADO DE GENERACION @ febrero 28, 2022
3. 22-00057 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O...
4. 22-00058 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O...
5. 22-00059 FINAL REPORT END OF MONTH INVENTORY 28FEBRUARY2022 NO. 2 FUEL O...
6. CERTIFICADO DE CANTIDAD - INVENTARIO FO @ PREPA PALO SECO SJ
7. Full Report 1310100016545 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M...
8. Full Report 1310100016546 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M...
9. Full Report 1310100016547 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M...
10. Full Report 1310100016548 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M...

11. GA022161 PREPA CENTRAL SJ TANK TRUCK INVENTORY (Feb. 28, 2022)
12. GA022166 PREPA Aguirre Tank Inventory (Feb 28, 2022)
13. GA022170 PREPA YABUCOA TANK INVENTORY (Feb 28, 2022)

LUMA uses the inventory audit data to adjust the beginning balances at the start of the reconciliation period, in this case LUMA used the November 30, 2021 inventory audit to adjust the beginning balances in December 2021. When LUMA files updated factors in June 2021, LUMA will use the inventory audit data from February 28, 2022 to adjust beginning balances for March 2022.

Permanent Rate Progress Report

22.03.16 Resolution and Order Request

Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

3. Provide detailed description of the pertinence of the file "Precio Ponderado Analisis_Revised — 2021.11.30 — NEPR-MI-2020-0001.xlsx". As part of the description, LUMA must explain the origin of the information contained in the Cells C10, C11, C24 y C25 of the document.

Answer:

During the December 2021 Technical Conference, Commissioner Rivera requested that PREPA review the Palo Seco and San Juan barrels. On February 1, 2022, LUMA received a revised set of reports from PREPA, correcting for the barrels at Palo Seco and San Juan. LUMA made the adjustment for the revised prices per barrel within the January Fuel Report. Please find below, PREPA's email notifying LUMA of the revision.

Good morning,

Attached please find our reference report.

This report has an adjustment on November numbers for Palo Seco and San Juan, according to doubts raised by the PREB during our last meeting, and from our further investigation.

These are our findings; first, it was found that an internal transfer from Palo Seco to San Juan was not included for both plants in the report and second, we had been notified from Palo Seco personnel that they use a different consumption information for Generation at the end of each month, taken from actual tank measurements. Such information is different from the daily information that we received, based on readings coming from the Foxboro meter. When tank measurements numbers and the internal transfer were introduced in the report for Palo Seco, the large difference disappeared. New deviations observed were 1.7% and 7.4% for Palo Seco and San Juan respectively.

To validate our calculations, we conducted a new end of the month inventory on December 30th for Palo Seco, and using the December consumption number from Generation, the deviation result for Palo Seco bunker was 4.2%. Deviation for diesel was 0.09%. This clearly validated our investigation.

It is important to mention that as a result of this review, the differences on new calculated weighted average prices for San Juan and Palo Seco for November will not cause a change on the calculated Kw-hr rate by the PREB. The calculated differences in price per barrel were 0.43% and 0.40% for Palo Seco and San Juan respectively.

I am including associated files for your reference.

Regards,

Edwin Barbosa
Fuels Office Manager
Office 702 NEOS building
787-521-4005
787-406-5248
edwin.barbosa@prepa.com

As a result of PREPA's revisions, storage prices for San Juan and Palo Seco Bunker C were revised from \$91.5673 and \$92.2079 to \$91.1715 and \$91.8351, respectively. The differences

of \$14,047.52 and \$4,182.80 were registered as part of the January 2022 reconciliation process. See attached screenshot of tab “FUELREP-Busqueda-JAN2022”, San Juan and Palo Seco columns. File located on current docket, under 22.03.15_Quarterly Factors/Working Documents/QUARTER RECONCILIATION FILE DEC2021-JAN-FEB2022; tab FUELREP-Busqueda-JAN2022, cell C26 and G26

	SAN JUAN		PALO SECO		AGUIRRE	
	BARRILES	\$	BARRILES	\$	BARRILES	
BEGINNING BALANCE						
NO. 2						324,565.69
NO. 6	86,733.06	7,788,925.37	290,086.73	25,901,175.78		255,616.73
GAS PROPANO	58.69	3,229.27	1,285.27	47,668.31		47.49
ADITIVOS						
COMPRADO GAS NATURAL						
TOTAL RECIBIDO	86,791.75	\$ 7,792,154.64	291,372.00	25,948,844.09		580,229.91 \$
RECIBIDO						
COMPRADO NO. 2						50,158.20
COMPRADO NO. 6	85,842.52	8,645,902.60	244,894.91	24,311,813.92		648,088.55
GAS PROPANO	27.00	2,406.83	175.94	15,493.18		30.26
Ecoeléctrica Delivery Point						
Ecoeléctrica Terminal Credit						
COMPRADO GAS NATURAL						
TOTAL RECIBIDO	85,869.52	\$ 8,648,309.43	245,070.85	\$ 24,327,307.10		698,277.01 \$
INVENTORY No 6 ADJUSTMENT FY 21-22		(4,182.80)		14,047.52		
INVENTORY No 2 ADJUSTMENT FY 21-22						
AJUSTES NATURAL GAS		(4,182.80)		14,047.52		
MISCELANEOS						
INSPECCIONES NO.2				\$ 3,685.12		\$
INSPECCIONES NO.6		7,509.36		9,794.36		
LABORATORIOS NO.2				8,342.76		
LABORATORIOS NO.6		10,717.19		11,307.08		
MANEJO GAS NATURAL						
MANEJO GAS PROPANO						
MANEJO NO. 2						
MANEJO NO. 6		-		-		
ALMACENAJE GAS NATURAL						
ALMACENAJE GAS PROPANO						
ALMACENAJE NO. 2						

The numbers in cells C10 and C24 of the file, related to Palo Seco inventory of No.6 Fuel of 233,019.88 barrels, were obtained from page 3 of the report “Full Report 1310100016410 - PUERTO RICO ELECTRIC (BR) POWER AUTHORITY, M. Rios.pdf”, which was provided by PREPA, and is available on public folder of December 21, 2021 filing, under Inventory 2021.11.30. See below.

PUERTO RICO ELECTRIC (B/R) POWER AUTHORITY
P.O. BOX 4267
00936 SAN JUAN
Puerto Rico
Mr. M. Rios
PS-TANK INVENTORY-11-21



Job No 13101/00016410.0000/01/1/21
Report date 02 Dec 2021
Installation Toa Baja, Puerto Rico, Central Palo Seco Terminal

Shore tank PS-TANK INVENTORY-11-21-PALO SECO
Product NO 6 Fuel Oil

Survey date: 30-Nov-2021

Shore Tank Inventory Report - 1

Shore tank measurement		Totals	R-1	R-2	R-4	S-1			
Open measurement									
Date/time of measurement		30 Nov 2021	20:00	30 Nov 2021	19:15	30 Nov 2021	19:35	30 Nov 2021	23:15
Average Innage	FT/IN		12-5-1/4	27-10-7/8	3-7-7/8	10-3-7/16			
Average temp.	°F		98.7	91.0	114.7	98.5			
T.O.V.	Barrels		64,591.87	15,229.09	138,771.41	3,782.61			
Ambient temp.	°F		81.00	81.00	81.00	81.00			
Tank shell temp.	°F		96.00	90.00	110.00	96.00			
CTsh			1.00045	1.00037	1.00062	1.00045			
G.O.V.	Barrels		64,620.94	15,234.72	138,857.45	3,784.31			
API 60°F			20.10	20.60	20.40	20.10			
V.C.F.	6B		0.98409	0.98721	0.97741	0.98417			
G.S.V.	barrels 60°F		63,592.82	15,039.87	135,720.66	3,724.40			
W.C.F.	MPMS 11.5.1.4.12		0.1457419409	0.1452622248	0.1454537323	0.1457419409			
W.C.F.	MPMS 11.5.1.4.15		0.1480806485	0.1475932345	0.1477878150	0.1480806485			
Long Tons			9,268.141	2,184.725	19,741.077	542.801			
Metric Tons Air			9,416.866	2,219.783	20,057.860	551.512			
Subtotals									
G.S.V.	barrels 60°F		233,019.88	63,592.82	15,039.87	135,720.66	3,724.40		
Long Tons			33,914.439	9,268.141	2,184.725	19,741.077	542.801		

Remarks

Tables used: 6B and W.C.F. MPMS 11.5.1.4.12.

Net calculation via S&W% (API MPMS 12.1)

Numbers in cells C11 and C25 of the file, related to San Juan inventory of No.6 Fuel of 97,107.93 barrels, were obtained from page 3 of report "21-10341 FINAL REPORT INVENTORY 30NOV.2021 NO. 6 FUEL OIL @ PREPA CENTRAL SAN JUAN, P.R - REF. SJ-TANK INVENTORY-11-21.pdf", which was provided by PREPA. It is also available on public folder of December 21, 2021 filing, under Inventory 2021.11.30. See below.

Shore Tank Measurements

Job #: PRPUE-21-10341-1
 Date: 29-Nov-2021
 Location: San Juan - Prepa - Central SJ
 Asse(s): Inventory
 Product(s): # 6 Fuel Oil
 Client(s): Autoridad De Energia Electrica De Puerto Rico-SJ-TANK INVENTORY-11-21



**BUREAU
VERITAS**

R-1		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	19:15	N/A	81.0	1.00035	1.80		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	3-0 3/8	5,139.88	N/A	0.00	18.8	88.9	5,141.68	0.98826	5,081.32			
Close												
Difference		5,139.88		0.00			5,141.68					
Adjustments to GSV										5,081.32		
R-2		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	19:40	N/A	81.0	1.00067	31.49		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	27-3 7/16	46,997.64	N/A	0.00	19.8	119.0	47,029.13	0.97575	45,888.67			
Close												
Difference		46,997.64		0.00			47,029.13					
Adjustments to GSV										45,888.67		
R-4		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	20:18	N/A	81.0	1.00056	21.71		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	10-2 7/8	38,764.48	N/A	0.00	20.2	108.1	38,786.19	0.98019	38,017.84			
Close												
Difference		38,764.48		0.00			38,786.19					
Adjustments to GSV										38,017.84		
S-1		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	21:45	N/A	81.0	1.00061	1.35		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	13-11 3/4	2,213.77	N/A	0.00	18.8	112.5	2,215.12	0.97862	2,167.76			
Close												
Difference		2,213.77		0.00			2,215.12					
Adjustments to GSV										2,167.76		
S-3		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	21:45	N/A	81.0	1.00061	1.36		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	4-4	2,222.77	N/A	0.00	18.8	112.5	2,224.13	0.97862	2,176.58			
Close												
Difference		2,222.77		0.00			2,224.13					
Adjustments to GSV										2,176.58		
S-4		Crit Zone	Phase	Date/Time		Roof Adj	Amb °F	CTSh Factor	CTSh Bbls	Lines Adj	VCF Table	CoE
			Open	30-Nov-2021	21:45	N/A	81.0	1.00061	2.35		6B-60°F	
			Close			N/A					6B-60°F	
Operation Phase	Gauge ft	TOV Barrels	FW Gauge ft	FW Barrels	API-60°F	Temp °F	GOV Barrels	VCF 60°F	GSV Barrels			
Open	22-9 7/8	3,855.90	N/A	0.00	18.8	112.5	3,858.25	0.97862	3,775.76			
Close												
Difference		3,855.90		0.00			3,858.25					
Adjustments to GSV										3,775.76		

Note: The File “Precio Ponderado Analisis _ Revised - 2021.11.30.xlsx” is provided in the “Inventory 2021.11.30” Folder within the Confidential folder. In the same folder LUMA included the support files listed below, which were provided by the PREPA Fuel Office.

1. PRECIO PONDERADO DIRECTORADO DE GENERACION @ noviembre 30, 2021 REVISED
2. PRECIO PONDERADO DIRECTORADO DE GENERACION @ noviembre 30, 2021

Permanent Rate Progress Report
22.03.16 Resolution and Order Request
Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

4. Provide an estimate of the incremental cost of the use of diesel fuel in Units San Juan 5 and 6, relative to the cost if natural gas had been used, during the months of December 2021, January, and February 2022.

Answer: PREPA will provide a response.

Permanent Rate Progress Report
22.03.16 Resolution and Order Request
Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

5. Provide the estimate of the penalties to which Naturgy Aprovevisionamientos, S.A. could be exposed for the breach of its obligation to provide natural gas to the Central Costa Sur for the period of December 1, 2021, to February 28, 2022

Answer: Fuel contracts are managed by PREPA, LUMA does not have any role in fuel purchasing or contracts. PREPA will provide a response.

Permanent Rate Progress Report
22.03.16 Resolution and Order Request
Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

6. Provide a detailed description of the methodology used, including worksheets in native format, for the calculation of price estimates of the different types of fuel to be used during the period of April 1, 2022, to June 30, 2022, as detailed in the tab "Attachment 3" (corrida de "PROMOD") of the file "APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx".

Answer: Fuel forecasts are provided to LUMA from PREPA. PREPA will provide a response.

Permanent Rate Progress Report

22.03.16 Resolution and Order Request

Docket ID: NEPR-MI-20-0001

Answer: TC-RFI-LUMA-MI-20-0001-22.03.16-PREB-001

Theme: Permanent Rate

Requirement:

7. The file “APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx” does not contain a tab titled “Attachment 7”. In this tab LUMA presents the information related to the correction of the billing problems experienced during the months of June, July, and August 2021. According to the documents presented during the reconciliation process that took place in December 2021, LUMA reported that, as of November 30, 2021, the amount of \$252,989.87 remained to be invoiced for the FCA clause and \$85,691.32 for the PPCA clause. LUMA indicated that it would invoice these amounts during the quarter from December 2021 to February 2022. However, it did not provide an update of that information. Therefore, LUMA must file a new file “APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx” containing the abovementioned update. If not, LUMA must provide the reasons why such information should not be part of this process.

Answer:

The requested information can be found in the file submitted titled “FCA and PPCA Not Billed Reconciliation.xlsx”. The file titled “APRIL-JUNE 2022 Factors - NEPR-MI-2020-0001.xlsx” was updated to reflect the unbilled information and is also submitted in this filing. The amounts of \$252,989.87 for FCA and \$85,691.32 for PPCA were recovered in December. The associated analysis can be found in the submitted file titled “FCA and PPCA Not Billed Reconciliation”.