

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

<b>NEPR</b>  <b>Received:</b>  Mar 10, 2022  9:30 PM
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**IN RE:**  
INFORMES DE PROGRESO DE  
INTERCONEXIÓN DE LA AUTORIDAD  
DE ENERGÍA ELÉCTRICA DE PUERTO  
RICO

**CASE NO. NEPR-MI-2019-0016**

**SUBJECT:**

**Request for an Extension of Time to  
Comply with Bench Order Issued at the  
Hearing Held on February 23, 2022**

**REQUEST FOR AN EXTENSION OF TIME TO COMPLY WITH  
BENCH ORDER ISSUED AT THE HEARING HELD ON FEBRUARY 23, 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. The captioned proceeding involves oversight by this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) of procedures to handle requests for interconnections of distributed generation systems, net metering, and microgrids to the Transmission and Distribution System (“T&D System”), pursuant to Acts 57-2014 and 17-2019.

2. Since July 2020, this Energy Bureau has required that the Puerto Rico Electric Power Authority (“PREPA”) submit quarterly progress reports on interconnections. *See* Resolution and Order of July 21, 2020. The docket of this proceeding also reveals that the Energy Bureau has held several compliance hearings.

3. On May 7, 2021, the Energy Bureau issued a Resolution and Order in which it took notice of the transition process underway between LUMA and PREPA (“May 7<sup>th</sup> Resolution and

Order”). On June 1, 2021, LUMA assumed its role as Operator of the T&D System per the terms of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020, as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement. In the May 7<sup>th</sup> Resolution and Order, the Energy Bureau ordered that LUMA shall file the quarterly progress reports that the Energy Bureau has required in this proceeding. *See* May 7<sup>th</sup> Resolution and Order on page 1.

4. On February 7, 2022, this Energy Bureau set a compliance hearing for February 23, 2022. *See* Resolution and Order of February 7, 2022.

5. On February 23, 2022, the compliance hearing for this instant proceeding was held. During the presentation, the Commissioners and representatives of the Independent Consumer Protection Office (“ICPO”) made various requests for information to the LUMA representatives. In total, there were fifteen (15) requests for which LUMA asked the Energy Bureau to provide fifteen days to submit its responses, being the due date March 10, 2022. Another number of requests must be complied with by the next compliance hearing on May 18, 2022.

6. LUMA has been earnestly working to comply with the February 23<sup>rd</sup> Bench Order by the deadline imposed. However, additional analysis and drafting are needed to submit correct and comprehensive responses to the requests issued by the Energy Bureau and ICPO. LUMA estimates it will need seven days, at least until March 17, 2022, to comply with the February 23<sup>rd</sup> Bench Order.

7. LUMA holds in high regard its duty to comply with the orders issued by the Energy Bureau in this and other regulatory and adjudicative proceedings. The request for an extension of time made herein is based on the understanding that LUMA’s continuous regulatory workload

provides justifiable cause for an extension until March 17, 2022, to comply with the February 23<sup>rd</sup> Bench Order. This request is submitted in good faith without the intent to delay the proceedings.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** LUMA until March 17, 2022, to comply with the February 23<sup>rd</sup> Bench Order.

**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](mailto:jmarrero@diazvaz.law); and Katiuska Bolaños-Lugo, [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law). Notice will also be sent to the Office of the Independent Consumer Protection Office, Lcda. Hannia Rivera Diaz, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov) and to counsel for the Puerto Rico Solar Energy Industries Association Corp. (“SESA”), [javrua@sesapr.org](mailto:javrua@sesapr.org).

In San Juan, Puerto Rico, this 10th day of March 2022.



**DLA Piper (Puerto Rico) LLC**  
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