

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

NEPR

Received:

Mar 2, 2022

11:48 PM

IN RE: REVIEW OF LUMA'S MODEL BILL

CASE NO. NEPR-MI-2021-0008

SUBJECT: Urgent Notice of Minor Data Issue Related
to Launch of Approved Model Bill

**URGENT NOTICE OF MINOR DATA ISSUE RELATED TO LAUNCH OF APPROVED
MODEL BILL**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

On November 16, 2021, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order approving LUMA’s Model Bill as submitted to the Energy Bureau on September 29, 2021 (the “September 29th Model Bill”).

On January 28, 2022, LUMA filed with the Energy Bureau a *Petition to Request Approval of Minor Revisions to Approved LUMA’s Model Bill* (“January 28th Petition”) requesting the Energy Bureau to approve an updated version of the September 29th Model Bill, included as Exhibit 1 to the January 28th Petition, which incorporated minor revisions to the September 29th Model Bill (the “January 28th Model Bill”).

On February 11, 2022, the Energy Bureau issued a Resolution and Order approving the January 28th Model Bill (“Approved LUMA Bill”).

¹ Register No. 439372.

² Register No. 439373.

As part of LUMA's efforts to help its more than 1.4 million customers make informed energy decisions, LUMA created a new bill design based on a review of current utility best practices and incorporating the requirements set by the Energy Bureau. LUMA redesigned the electric utility bill in order to make it more transparent, easy to read, and useful by including tips for saving energy and money. In addition to the information shown on the previous PREPA bill, the new bill design provides customers additional data and information using larger font sizes, bright colors, customer-friendly language and illustrations to support greater understanding among customers of their energy usage. LUMA is ready to issue this new bill design on March 4, 2022.

In the most recent quality assurance check LUMA discovered a minor data issue impacting the bills of less than 130,000 customers - that is, less than ten percent (10%) of its customers. Specifically, the data for the twelve (12)-month cost per unit of energy (\$ per kWh) graph on the fourth logical page of the bill ("Cost per kWh Graph") was only available for the last three months for commercial and industrial customers. In the final review of the bills conducted this morning, LUMA also noticed that due to this situation, the system is unable to present the entire Cost per kWh Graph and therefore the bills for the affected customers will not contain the Cost per kWh Graph on the fourth logical page of the bill. It is important to note that this historical cost per kWh data and graph is not shown on customers' current bills that use the PREPA format. LUMA is taking immediate action to have this data issue corrected as soon as possible and this correction is expected to be available no later than the second cycle (i.e., second month). A rendering of this page is shown in Exhibit 1 herein, for both the Spanish and English versions of the bill. The rest of the page and bill will remain identical to the Approved LUMA Bill. LUMA will maintain the Energy Bureau informed of any developments related to this issue.

To be clear, the current PREPA bill does not provide historical cost per kWh information for industrial and commercial customers. The data issue described above will not have an adverse effect on these customers when compared to their current bill. All of LUMA's industrial and commercial customers will still receive an improved easier to read bill providing more information than the current bill.

LUMA respectfully submits that continuing with the proposed launch of the Approved LUMA Bill with the adoption of the above-mentioned solution in the case of the industrial and commercial customers affected by the minor data issue is in the best interest of all customers. Again, all customers will receive a bill that is easier to read and provides more information than the previous PREPA bill. Given the corrective actions already underway, minor nature of this issue, and the additional costs that would result from delay, LUMA respectfully submits that the proposed launch should move forward as planned.

Today, LUMA informed the Independent Consumer Protection Office (ICPO) of this situation and provided the ICPO an electronic copy of Exhibit 1 of this Motion, which is the rendering of the fourth logical page of the bill that will be sent to commercial and industrial customers in the current billing cycle. ICPO informed LUMA that they have no objection to LUMA proceeding as indicated herein but requested that it be informed as soon as the data issue is corrected.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the urgent notice above, **accept Exhibit 1** of this Motion, and **authorize** LUMA to exclude the Cost per kWh Graph on the fourth logical page of the Approved LUMA Bill for the less than 130,000 industrial and commercial customers affected by the minor data issue described herein, limited to the first billing cycle (i.e., month) of the Approved LUMA Bill to be launched on March 4, 2022.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of March 2022.

I hereby certify that I filed this Petition using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Petition to the attorneys for **PREPA**, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law. Notice will also be sent to the **Independent Consumer Protection Office**, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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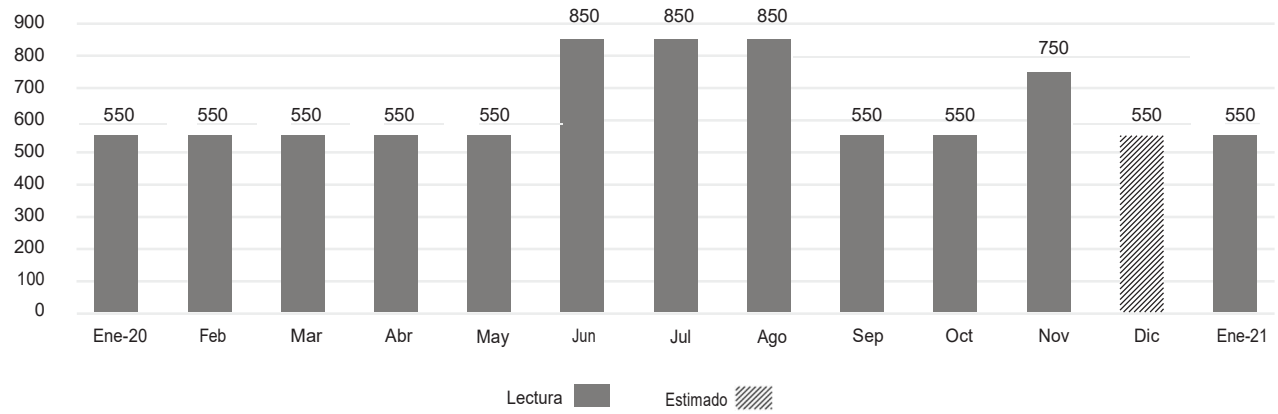
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Exhibit 1

HISTORIAL DE CONSUMO (KWH)

ID localidad: 9999999999



CONSUMPTION HISTORY (KWH)

Premises ID: 9999999999

