

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

NEPR

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IN RE: INTERRUPCIÓN DE SERVICIO  
ELÉCTRICO DE 6 DE ABRIL DE 2022

**CASE NO. NEPR-IN-2022-0002**

**SUBJECT:**

**Request for Brief Extension of Time to  
Submit Documents and Information in  
Response to Request for Information**

**MOTION FOR BRIEF EXTENSION OF TIME TO SUBMIT DOCUMENTS AND  
INFORMATION IN RESPONSE TO REQUEST FOR INFORMATION**

**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<sup>1</sup>:

1. On April 6<sup>th</sup> 2022, a failure in the electric system led to a fire at the Costa Sur transmission substation, which resulted in a power outage of the entire electrical system (hereinafter, the “April 6<sup>th</sup> Incident”).

2. On April 8<sup>th</sup> 2022, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order whereby it initiated an investigation of the April 6<sup>th</sup> Incident (“April 8<sup>th</sup> Order”).

3. On April 12<sup>th</sup>, 2022, in compliance with the April 8<sup>th</sup> Order, LUMA submitted the Preliminary Report of the April 6<sup>th</sup> Incident. The Preliminary Report included the information that

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in LUMA’s *Motion Submitting Updated Report and Request for Confidential Treatment*, filed in this Energy Bureau on April 18<sup>th</sup>, 2022.

LUMA had gathered thus far, preliminary findings and assessments of the April 6<sup>th</sup> Incident, and a summary of the corrective actions taken by LUMA.

4. On April 14<sup>th</sup>, 2022, to aid the Energy Bureau in its investigation and supplement the Preliminary Report, LUMA filed a *Motion to Supplement Preliminary Report on April 6<sup>th</sup> Incident*. Therein, LUMA submitted two (2) video recordings, including a screen camera from the Costa Sur transmission substation, which shows the moment of the explosion, and an aerial view video recorded the morning after the April 6<sup>th</sup> Incident.

5. On April 18<sup>th</sup>, 2022, in compliance with the April 8<sup>th</sup> Order and to be transparent with its customers and regulators about its operations, LUMA filed a *Motion Submitting Updated Report and Request for Confidential Treatment*. Therein, LUMA submitted the Updated Report of the April 6<sup>th</sup> Incident, which provided an update on the following topics:

- i. Overview of third-party industry expert hired to assist with analysis;
- ii. Outage investigation update and proactive maintenance plan/strategy;
- iii. System analysis update including adding dynamic stability analysis into model; and
- iv. Ongoing restoration activities at Costa Sur.

6. In the Updated Report, LUMA informed that a third-party investigation firm, Exponent, had been retained to assist LUMA with the investigation and analysis of the April 6<sup>th</sup> Incident. Further, LUMA disclosed that, given the highly technical and extensive nature of the investigation and the desire to conduct an exhaustive, comprehensive, and scientific review, it was not possible to establish a fixed date for completion of the root cause investigation and analysis, and the submission of the Final Report. Nevertheless, LUMA agreed to provide an update to the

Energy Bureau on the schedule, scope, and status of the investigation on or before May 9<sup>th</sup>, 2022 (the “Second Updated Report”).

7. On April 22<sup>nd</sup>, 2022, the Energy Bureau issued a Resolution and Order instructing LUMA and PREPA to submit, on or before May 6<sup>th</sup>, 2022, at noon, certain documents and information in connection with the April 6<sup>th</sup> Incident (“April 22<sup>nd</sup> Order”).

8. LUMA has been working diligently to comply with the April 22<sup>nd</sup> Order and prepare the Second Updated Report. However, LUMA needs additional time to present all responsive documents and information to the Energy Bureau’s requests. As this Energy Bureau has been made aware, the April 6<sup>th</sup> Incident is part of an ongoing internal investigation to which the pertinent LUMA employees devote a substantial amount of effort. LUMA estimates that it will require a brief extension until the end of Monday, May 9<sup>th</sup>, 2022, to comply with the April 22<sup>nd</sup> Order.

9. As acknowledged in the April 18<sup>th</sup> submission, LUMA will file a Second Updated Report on the April 6<sup>th</sup> Incident on May 9, 2022. LUMA understands it would be more beneficial for this Energy Bureau to receive both the Second Updated Report and any responsive documents and information to the requests on the same day for its eventual consideration. Considering there is an overlap in the subject matter of both submittals, to avoid duplicity, it would be more efficient to file the materials at the same time.

10. 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. This request for an extension of time is submitted in good faith without the intent to delay this proceeding.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** LUMA until the end of Monday, May 9<sup>th</sup>, 2022, to comply with the April 22<sup>nd</sup> Order.

**RESPECTFULLY SUBMITTED.**

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 attorney for PREPA, Bolaños-Lugo, [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law).

In San Juan, Puerto Rico, this 4<sup>th</sup> day of May 2022.



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