

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

<b>NEPR</b>  <b>Received:</b>  <b>May 31, 2022</b>  <b>9:27 PM</b>
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**IN RE:**

IMPLEMENTATION OF THE PUERTO RICO ELECTRIC POWER AUTHORITY INTEGRATED RESOURCE PLAN AND MODIFIED ACTION PLAN

**CASE NO. NEPR-MI-2020-0012**

**SUBJECT: Submittal of Final Technical Interconnection Studies for Eighteen Tranche 1 Projects Required under Energy Bureau’s Resolution and Order of April 27, 2022, and Request for Confidential Treatment**

**MOTION SUBMITTING FINAL TECHNICAL INTERCONNECTION STUDIES FOR EIGHTEEN TRANCHE 1 PROJECTS REQUIRED UNDER ENERGY BUREAU’S RESOLUTION AND ORDER OF APRIL 27, 2022, AND REQUEST FOR CONFIDENTIAL TREATMENT**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC** (collectively “LUMA”), through the undersigned legal counsel, and respectfully submit the following:

On April 27, 2022, this honorable Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) issued a Resolution and Order (the “April 27<sup>th</sup> Order”) in connection with the eighteen (18) renewable energy projects of the Tranche 1 renewable energy procurement<sup>1</sup> that were approved by the Energy Bureau by Resolution and Order of February 2, 2022 (the “Approved Projects”).

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<sup>1</sup> This is the first procurement tranche to be conducted by the Puerto Rico Electric Power Authority (“PREPA”) contemplated under the Final Resolution and Order on the Puerto Rico Electric Power Authority’s Integrated Resource Plan, *In re: Review of the Integrated Resource Plan of the Puerto Rico Electric Power Authority*, Case No. CEPR-AP-2018-0001, of August 24, 2020.

In the April 27<sup>th</sup> Order, the Energy Bureau issued separate orders to LUMA and PREPA with the purpose of expediting the work necessary to lead to PREPA's execution of the power purchase agreements for the Approved Projects.

In the April 27<sup>th</sup> Order, the Energy Bureau ordered LUMA to: (a) submit to the Energy Bureau a progress report of the status of "certain technical studies (*i.e.*, Facilities Studies: Network Upgrades and Final Report: Interconnection Studies)" for the Approved Projects and an updated Task Schedule to expedite the completion of these studies (*see id.* at page 1, numbered paragraph 1) ("Order No. 1"); (b) file with the Energy Bureau on or before May 15, 2022, at 12:00 p.m., a copy of the Facilities Studies (*see id.* at numbered paragraph 2) ("Order No. 2"); and (c) file with the Energy Bureau on or before May 30, 2022, at 12:00 p.m., a copy of the results of the Tranche 1 technical studies (*see id.* at numbered paragraph 3) ("Order No. 3").

On April 29, 2022, LUMA filed a *Motion in Compliance with the Progress Report and Updated Task Schedule Requirements of the Energy Bureau's Resolution and Order of April 27, 2022* (April 29<sup>th</sup> Motion") submitting to the Energy Bureau a Progress Report describing LUMA's efforts and the status of activities undertaken in connection with the preparation of a Final Technical Interconnection Study, which included estimated dates for completion of all of the studies and associated tasks and a Task Schedule.

In the April 29<sup>th</sup> Motion LUMA informed that the report for final technical interconnection study ("Final Technical Interconnection Study") for each of the Approved Projects would be delivered to PREPA and filed with the Energy Bureau by May 30, 2022, in compliance with Order No. 3. LUMA also explained that the Final Interconnection Study would consist of a package of studies providing a complete picture of the relevant technical information for interconnection of

each Approved Project, including: the System Impact Study, the Point of Interconnection Facility Study, the Network Upgrades Facility Study (the latter two jointly, referred to as the “Facility Studies”) and the Minimum Technical Requirements (“MTR”) Compliance Study.

In the April 29<sup>th</sup> Motion, LUMA also respectfully requested this honorable Energy Bureau to provide a brief extension of the deadline set forth in Order No. 2 to allow for the submittal of the Facility Studies by May 30, 2022, as part of the complete package of studies included in the report of the Final Technical Interconnection Study for each Approved Project (“Final Technical Interconnection Study Report”) to be submitted on that date.<sup>2</sup>

LUMA has completed and is submitting herein, as Exhibit 1, under seal of confidentiality, the Final Interconnection Study Reports for the Approved Projects. Specifically, the Final Interconnection Study Reports are comprised of 21 studies for 19 points of interconnection. The projects include the Approved Projects (18 solar Photovoltaic (PV) facilities) and three Battery Energy Storage Systems (BESSs). Given the volume of the entire package of Final Interconnection Study Reports, LUMA will be submitting these documents to the Energy Bureau via ShareFile contemporaneously with the filing of this Motion. LUMA is also electronically delivering these documents to PREPA on this date.

The Final Interconnection Study Report for each project includes an executive summary and the following appendices: (a) Interconnection Studies Summary Report (b) Facility Study POI

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<sup>2</sup> In support of this request, LUMA explained that the submittal of the Facilities Study in advance, and in isolation, of completion of the comprehensive package included in the Final Technical Interconnection Study Report would be premature and would provide an incomplete picture of the technical interconnection needs and requirements of an Approved Project. In addition, certain components of the Facilities Study and the full technical and compliance review of the Final Technical Interconnection Study would not be completed by that date. *See* April 29<sup>th</sup> Motion at p. 3.

Cost Estimates, (c) Facility Study Network Upgrade Cost Estimates, and (d) LUMA Interconnection Facility Works. The executive summary presents an overview of the findings and a cost estimate for the necessary improvements in the points of interconnection and network upgrades.

LUMA respectfully submits that, since the Technical Interconnection Study Reports in Exhibit 1 are part of the ongoing Tranche 1 procurement process, these documents should be maintained in confidence to protect the competitive nature and fairness of that procurement process. In addition, these documents constitute Owner Confidential Information that must be maintained in confidence by LUMA pursuant to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement of June 20, 2020. For these reasons, among others, LUMA hereby requests the Energy Bureau to receive and maintain the entire contents of Exhibit 1 under seal of confidentiality pursuant to the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, and partially amended on September 16, 2016. Within the next ten days, LUMA will submit a memorandum of law in support of this request for confidential treatment of Exhibit 1.

**WHEREFORE**, LUMA respectfully requests the Energy Bureau to **take notice** of the aforementioned, **accept, under seal of confidentiality**, the Final Technical Interconnection Study Reports for the Approved Projects submitted to the Energy Bureau as Exhibit 1 hereof in compliance with Orders No. 2 and 3 of the Energy Bureau's April 27<sup>th</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 31<sup>st</sup> day of May 2022.

We hereby certify that we filed this motion using the electronic filing system of this Puerto Rico Energy Bureau and that copy of this motion was notified to PREPA counsel [mvazquez@diazvaz.law](mailto:mvazquez@diazvaz.law) and [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law).



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**Exhibit 1**

Final Technical Interconnection Study Reports

*[Submitted Via Sharefile under seal of confidentiality]*