

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

NEPR Received: Jun 21, 2022 3:06 PM
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IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Revised Submission of
Reconciliations and FCA, PPCA, and FOS
Calculated Factors and Request for
Confidential Treatment**

**MOTION SUBMITTING REVISED QUARTERLY RECONCILIATIONS AND
FCA, PPCA, AND FOS CALCULATED FACTORS AND
REQUEST FOR CONFIDENTIAL TREATMENT**

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”), through the undersigned counsel, and respectfully state and request the following:

1. On June 15, 2022, LUMA filed before the Puerto Rico Energy Bureau (“Energy Bureau”) a *Motion Submitting Quarterly Reconciliations and FCA, PPCA and FOS Calculated Factors and Request for Confidential Treatment* (“June 15th Submission”). LUMA submitted the quarterly reconciliations for the Fuel Charge Adjustment (“FCA”) and Purchased Power Charge Adjustment (“PPCA”) riders for March through May 2022 and the factors for the FCA, PPCA, and Fuel Oil Subsidy (“FOS”) riders for the period from July 1 until September 30, 2022. As part of the filing, LUMA included excel spreadsheets filed publicly and confidential excel spreadsheets with formulae intact.

2. In the June 15th Submission, LUMA informed the Energy Bureau that the Puerto Rico Electric Power Authority (“PREPA”) sent the final data for April and May 2022 on the morning of the filing. Since the data was not certified on time for the filing, the calculations

included in the June 15th Submission were based on preliminary certified data, as LUMA did not have sufficient time to revise the final uncertified numbers. Therefore, LUMA notified the Energy Bureau that as soon as PREPA certified the final data for April and May 2022 and LUMA recalculated the data provided, it would submit a revised version of the June 15th Submission.

4. On June 16, 2022, PREPA provided the final certified data for May 2022 fuel consumption. The final certified data submitted by PREPA vary from the preliminary data provided, thus the need to revise the reconciliation and determine the factors.

5. LUMA hereby submits that for May 2022, the Fuel Costs and prior period adjustments were \$280,779,128.37, and revenues total \$250,572,297.98. There was a revenue insufficiency of \$30,206,830.39. The Purchased Power Costs and the prior period adjustments were \$43,618,920.58, and revenues totaled \$44,730,257.34. There was an excess revenue of \$1,111,336.76.

6. The quarter total of Fuel Costs, and prior period adjustments (FCA), for March, April, and May 2022 were \$720,515,179.44, and revenues totaled \$638,236,675.99. There was a revenue insufficiency of \$82,278,503.45. The final certified data provided by PREPA reduces by \$58,007.05 the FCA, compared with the numbers presented in the June 15th Submission based on preliminary certified data.

7. In view of the above, LUMA respectfully requests that the Energy Bureau review the following revised calculated factors, applicable for the next quarter from July 1st, 2022, until September 30th, 2022:

FCA -\$0.225338

PPCA -\$0.032501

FOS -\$0.028901

See “July-September 2022 Factors”, Attachments 1 and 2.

8. The Excel spreadsheet titled “July-September 2022 Factors” submitted herein includes the calculations for the proposed FCA, PPCA, and FOS factors. FCA and FOS are presented in Attachment 1, and the PPCA factors are presented in Attachment 2. The updated FCA factor is one cent (0.01¢) below the numbers shown in the June 15th Submission.

9. LUMA’s submission of the revised quarterly reconciliations for March through May 2022 and the calculated FCA, PPCA, and FOS rider factors include Excel spreadsheets being filed publicly via email in a file entitled Values submitted with this Motion. Alongside this Motion, LUMA is also submitting via email confidential Excel spreadsheets with formulae intact submitted in a file entitled Confidential.

A. Confidential Folder

Quarter Reconciliation File Mar-Apr-May 2022
July-September 2022 Factors_
Load Forecast FY 2023

B. Public Files in Values Folder

Quarter Reconciliation File Mar-Apr-May 2022_Values
July-September 2022 Factors_Values
Load Forecast FY 2023_Values

10. The confidential Excel files described above and submitted herein include spreadsheets submitted in native format (.xls) and with formulae intact. They include formulae and original calculations made by LUMA personnel that reveal confidential procedures. They have sensitive commercial information belonging to LUMA and/or PREPA and are thus protected by law, which should not be disclosed in its native form.

11. The Excel spreadsheets that have been submitted today in native form and with formulae intact in the file entitled *Confidential* are protected as trade secrets. They have

commercial value to LUMA and PREPA as they reveal confidential processes and analyses to produce calculations supporting the public filings of the proposed FCA, PPCA, and FOS factors. LUMA and PREPA keep and maintain these native files confidentially and do not disclose them to the public or unauthorized third parties. Thus, LUMA respectfully requests that the Excel files submitted today in the file entitled *Confidential*, be received, kept, and maintained confidentially by this Energy Bureau.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the revised filing of the FCA, PPCA, and FOS reconciliations for March through May 2022, and the calculated factors for the quarter starting on July 1, 2022; and **grant** the request to keep confidentially the spreadsheets that have been filed in excel format and with formulae in the file entitled *Confidential* that is submitted with this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 21st day of June 2022.

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau. 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.



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