

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

<b>NEPR</b>  <b>Received:</b>  <b>Jun 16, 2022</b>  <b>12:06 AM</b>
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**IN RE:**

PROCESS FOR THE ADOPTION OF  
REGULATION FOR DISTRIBUTION  
RESOURCE PLANNING

**CASE NO.:** NEPR-MI-2019-0011

**SUBJECT:** Request for Extension to Submit Implementation Plan Required under Energy Bureau's Resolution and Order notified on May 26, 2022

**MOTION REQUESTING EXTENSION TO SUBMIT IMPLEMENTATION PLAN  
REQUIRED UNDER ENERGY BUREAU'S RESOLUTION AND ORDER NOTIFIED  
ON MAY 26, 2022**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COME NOW, LUMA ENERGY, LLC** as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, LUMA), through the undersigned legal counsel and respectfully state and submit the following:

On December 31, 2020, this honorable Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order in the instant proceeding ordering the Puerto Rico Electric Power Authority ("PREPA") to create voltage level and interconnection capacity maps ("December 31<sup>st</sup> Order"). *See* December 31 Order at p.1. The interconnection capacity maps were required to contain, at a minimum, the basic information to maintain potential proponents informed of the current state of the feeders to which they intend to interconnect. *See id.*

On July 21, 2022, PREPA informed this Energy Bureau that it had uploaded the requested voltage level maps on the electronic filing portal for filing distributed generation ("DG") projects which went live on May 28, 2021. *See* PREPA's *Informative Motion Regarding Voltage Level Maps* of July 21, 2022.

On October 1, 2021, in compliance with the December 31<sup>st</sup> Order, LUMA informed this Energy Bureau that as of September 30, 2021, interconnection capacity maps had been made available for use by any customers or DG developers on the lumapr.com website. *See* LUMA’s *Informative Motion on Compliance with Order on Interconnection Capacity Maps* of October 1, 2021.

After other procedural events, on May 25, 2022, the Energy Bureau issued a Resolution and Order, notified on May 26, 2022 (“May 26 Order”), requesting additional information and actions in connection with the interconnection capacity maps submitted by LUMA on September 30, 2021. In the May 26 Order the Energy Bureau recognizes that the information submitted by LUMA in the interconnection capacity maps is valuable but also understands that additional information on specific elements (e.g., the capacity of service transformer and caliber of secondary existing cables) related to the proposed interconnection location could be useful as a determining factor for the viability of the immediate installation of a DG. *See* May 26<sup>th</sup> Order at pp. 1-2.

The Energy Bureau then orders LUMA to: (1) provide more detailed information regarding the localized interconnection capacity, upon request of a proponent, in the interconnection filing platform within 10 working days from a proponent’s request for this information, including the information specified in the May 26<sup>th</sup> Order (*see id.* at p. 2, Paragraph 1); (2) by September 30, 2022, expeditiously conduct any necessary processes (e.g., administrative, programming or the like) to update the voltage level and interconnection capacity maps simultaneously with the completion of the interconnection of a DG system so that these reflect the most recent information of the state of the system (*see id.* at Paragraph 2); (3) in the meantime and until the process in the preceding item 2 is completed, update the voltage level and interconnection capacity maps at least monthly

(*see id.* at Paragraph 3); (4) ensure the maps indicate the date of updating so that the user can use this information in its decision-making regarding interconnection applications and similar matters (*see id.* at Paragraph 4); (5) submit to the Energy Bureau, on or before June 30, 2022, a detailed implementation plan to achieve compliance with the requirements in the May 26<sup>th</sup> Order, including a Gantt Chart reflecting the anticipated process to achieve compliance (the “Implementation Plan”) (*see id.* at Paragraph 5); (6) submit monthly progress reports regarding the execution of the Implementation Plan on July 30, 2022, and August 31, 2022 (*see id.* at p. 3, Paragraph 6); and (7) submit a final implementation report regarding the matters ordered in the May 26<sup>th</sup> Order on or before September 30, 2022 (*see id.* at Paragraph 7).

LUMA anticipates it will need additional time to complete the Implementation Plan required under the May 26<sup>th</sup> Order. Members of the LUMA project team that will be involved in the preparation or review of the Implementation Plan are already actively engaged in addressing requirements under other Resolutions and Orders issued by this Energy Bureau in other proceedings, most of which precede the May 26<sup>th</sup> Order, thereby limiting the time the team has available to adequately prepare and complete the Implementation Plan. Among others, some of these LUMA project team members: (i) are working on a Transition Period Plan for Energy Efficiency and Demand Response that must be filed in the case NEPR-MI-2021-0006 by June 21, 2022 with a Technical Workshop scheduled on June 29, 2022; (ii) must prepare for and attend a technical workshop to be held by this Energy Bureau regarding the Avoided Capacity Cost Methodology on June 22, 2022, in case NEPR-MI-2021-0009; (iii) must work on revising a proposed EV rate design proposal for filing on June 30, 2022, to comply with the Resolution and Order of May 19, 2022, in case NEPR-MI-2021-0013; and (iv) must prepare a plan to seek funding

for network upgrades by July 28, 2022, in response to the Resolution and Order of June 13, 2022 in case NEPR-MI-2020-0012, among others. In addition, several LUMA project team members will be out of the office for planned vacations during the summer months.

Given the significant efforts required to address all the mentioned requirements during the same general time period, the LUMA team project anticipates that it cannot reasonably complete a quality Implementation Plan by June 30, 2021 and that it will require additional time until July 29, 2022, to prepare and complete an Implementation Plan acceptable to LUMA and appropriate for submittal to this honorable Energy Bureau.

LUMA respectfully submits that the extension requested herein will allow LUMA to better understand the work involved to comply with PREPA's order and to prepare a complete Implementation Plan with the requirements under the May 26<sup>th</sup> Order. After completion of the Implementation Plan, LUMA will be able to provide an update on the additional established deadlines in the May 26<sup>th</sup> Order.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and grant LUMA a brief extension to submit the Implementation Plan required under the May 26<sup>th</sup> Order until July 29, 2022.

**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).

In San Juan, Puerto Rico, this 15<sup>th</sup> day of June 2022.



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