

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

NEPR

Received:

Jun 30, 2022

10:29 PM

IN RE:

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

CASE NO. NEPR-MI-2020-0012

**SUBJECT: Motion in Compliance with Resolution and
Order of June 9, 2022**

MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF JUNE 9, 2022

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:

1. On June 9, 2022, this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (the “June 9th Order”) in the instant proceeding creating a Selection Committee in connection with the process to select bids submitted in the Tranche 2 and subsequent renewable energy procurement processes, to be composed of six (6) members including one member designated by LUMA (the “Selection Committee”).

2. To that end, the Energy Bureau required that on or before June 30, 2022, LUMA inform the name of the member designated by the company to be part of the Selection Committee.

3. On June 29, 2022, LUMA filed a *Motion Requesting Modification of the Energy Bureau’s Resolution and Order of June 9, 2022, with Respect to the Composition of the Selection Committee Established Therein* whereby it respectfully requested that this honorable Energy Bureau modify its determination in the June 9th Order providing for only one LUMA member in the Selection

Committee and to determine to include an additional LUMA member therein (the “Request for Modification”).

4. As discussed in detail in the Request for Modification, which arguments are incorporated as if fully stated herein by reference, given LUMA’s roles and responsibilities as Operator of the Transmission and Distribution System (“T&D System”) under the *Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement* dated June 22, 2020 (the “T&D OMA”) (which include T&D System planning, capital improvements, generator interconnections and energy dispatching and generation-related services); experience in the Tranche 1 procurement process (including technical input impacts on transmission system and interconnection studies); and breadth of in-house expertise, LUMA is in a distinct position to make valuable technical contributions to the Selection Committee in connection with Tranche 2 and subsequent procurement processes. Therefore, the inclusion of only one member of the Selection Committee designated by LUMA is not reflective of LUMA’s role, expertise and contributions to the processes to be considered by the Selection Committee. The Request for Modification is pending before the Energy Bureau.

5. In compliance with the June 9th Order, LUMA hereby informs that it has designated Mario Hurtado, Chief Regulatory Officer, as its member of the Selection Committee. In addition, in case this Energy Bureau approves LUMA’s Request for Modification and determines to increase the number of LUMA members in the Selection Committee, LUMA hereby informs that it proposes to designate Dr. Shay Bahramirad, Senior Vice President Engineering and Asset Management as the potential second LUMA member to the Selection Committee.

WHEREFORE, LUMA respectfully requests the Energy Bureau to **take notice** of the aforementioned and **deem** its June 9th Order complied with as it pertains to LUMA.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th of June 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 and kbolanos@diazvaz.law.



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