

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

NEPR

Received:

Aug 19, 2022

4:14 PM

**IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE**

CASE NO. NEPR-MI-2020-0001

SUBJECT:

Motion in Compliance with Resolution and Order of
August 4, 2022

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF AUGUST 4, 2022
TO THE PUERTO RICO ENERGY BUREAU:**

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

1. On May 31, 2022, LUMA filed before the Puerto Rico Energy Bureau (“Energy Bureau”) a *Motion Submitting CILTA, SUBA-HH, and SUBA-NHH Proposed Factors and Request for Confidential Treatment* (“May 31st Submission”). LUMA submitted the annual proposed contributions in lieu of taxes cost adjustment (“CILTA”), help to human subsidies (“SUBA-HH”), and non-help to human subsidies (“SUBA-NHH”) factors reconciliations. It also presented the CILTA, SUBA-HH and SUBA-NHH proposed riders to be applied from July 2022 until June 2023.

2. On June 15, 2022, LUMA filed before the Energy Bureau a *Motion Submitting Quarterly Reconciliations and FCA, PPCA and FOS Calculated Factors and Request for Confidential Treatment* (“June 15th Submission”). With the June 15th Submission, LUMA included supporting documentation on the calculated quarterly reconciliations for the Fuel Charge

Adjustment (“FCA”) and Purchased Power Charge Adjustment (“PPCA”) riders and the calculated factors for the FCA, PPCA, and Fuel Oil Subsidy (“FOS”) riders to be applied during the period from July 1st until September 30th, 2022.

3. On June 17, 2022, the Energy Bureau issued a Resolution and Order in which it, among others, scheduled a Technical Conference on June 24, 2022, at 10 a.m. to discuss the above-mentioned submissions.

4. On June 24, 2022, the Technical Conference for this instant proceeding was held. During the hearing, the Commissioners made three (3) requests for information to the LUMA representatives. The requests for information were the following:

- a. Provide a sensitivity analysis; of the impact of a \$2 drop on natural gas prices.
- b. Provide data on peak reserve forecast amounts for the summer months.
- c. Provide information on whether LUMA has begun to implement consumer education programs for energy conservation and what mechanisms LUMA has in place.

5. On June 28, 2022, LUMA filed a *Motion in Compliance with Bench Order Issued at the Technical Conference Held on June 24, 2022*. LUMA responded to the requests for information posed during the Technical Conference, including information and examples of the consumer education programs for energy conservation LUMA has begun to implement, and the mechanisms in place to carry out those programs. Therein, LUMA showed how the new electricity bill contains tools for customers to understand their electricity usage better, such as energy conservation tips to help the customer save money. LUMA also included examples of ongoing

social media energy-saving campaigns, conservation messages around specific events, and preemptively notifying customers of potential generation shortfalls.

6. On August 4, 2022, the Energy Bureau entered a Resolution and Order in which it required LUMA to submit on or before August 19, 2022, (i) a summary of the conservation campaign plan, including, among other things, a list of the media and/or mechanisms to be used for its dissemination, (ii) evidence of the efforts made, and (iii) a projection of the number of clients expected to be impacted by the campaign (“August 4th Order”).

7. In compliance with the August 4th Order, LUMA respectfully submits a summary of the conservation campaign plan, evidence of the efforts made, and the number of clients impacted by the campaign as Exhibit 1 to this Motion. As explained in Exhibit 1, LUMA has increased its event-related social media messaging, its ongoing social media energy-saving campaign, and conservation knowledge and tips through its social media channels. Additionally, LUMA has posted energy conservation videos through its social media accounts, providing recommendations on ways customers can conserve energy. Moreover, the Energy Bureau will find the projection of the number of customers impacted by these energy conservation education efforts through customer bill inserts and each social media channel.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the documents included as Exhibit 1 to this Motion, and **deem** LUMA complied with the August 4th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 16th day of August 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.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9132
Fax 939-697-6102

/s/ Yahaira De la Rosa Algarín
Yahaira De la Rosa Algarín
RUA NÚM. 18,061
yahaira.delarosa@us.dlapiper.com

Exhibit 1

Permanent Rate August 19, 2022, Information Request Response in Compliance with Resolution and Order from August 4, 2022

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20220819-PREB-01

SUBJECT

Permanent Rate

REQUEST

LUMA to provide a summary of the conservation campaign plan, a list of the means and mechanisms to be issued, evidence of the efforts made, and a projection of the number of customers LUMA expects to impact with this conservation campaign.

RESPONSE

On June 28, 2022, LUMA filed a motion addressing energy conservation in response to a technical conference request (June 28 TCIR) made by this Energy Bureau. In the June 28 TCIR, LUMA acknowledged the importance of energy conservation and outlined the ways it encourages customers to save energy through various methods.

LUMA strongly supports energy conservation and actively encourages customers to save energy through the following distribution channels:

- Customer Bill Inserts
- Social Media Channels (Facebook, Twitter, Instagram, LinkedIn, and YouTube)
- Primary Website: LUMApr.com
- LUMA's Savings Website: <https://lumapr.com/residencial/ahorrando-energia-y-dinero/>
- Primary Mobile App: [Mi LUMA](#)
- Primary Phone Number: 1-844-888-5862

As previously mentioned in the June 28 TCIR, LUMA released a new customer bill design in March 2022, which includes energy conservation tips to help customers save money. LUMA shared the news through its social media platforms to ensure customers were informed of the information. In addition to the new bill design, LUMA also distributes informational bill inserts containing energy conservation tips, as shown in the image bellow. The energy conservation bill inserts were sent to customers throughout August.

LUMA está comprometida con transformar el sistema eléctrico en Puerto Rico para servir mejor a nuestros 1.5 millones de clientes.

El cambio no ocurrirá de la noche a la mañana, pero estamos haciendo avances cada día. En poco más de un año, algunos de nuestros principales logros son:

- Reparar y reemplazar más de 3,000 postes
- Despejar vegetación peligrosa de sobre 300 subestaciones y restaurar 3 subestaciones
- Conectar a más de 25,000 clientes a cubiertas solares, lo que representa sobre 130 MW de energía renovable

Estamos conscientes de que aún queda mucho por hacer, pero los 3,000 hombres y mujeres de LUMA se mantienen enfocados en cumplir nuestra misión de construir la red eléctrica moderna que el pueblo de Puerto Rico espera y merece.



Para conocer más sobre nuestro progreso y sobre nuestro compromiso con reparar, restaurar y reconstruir el sistema eléctrico de Puerto Rico, visítanos en lumapr.com

CONSEJOS PARA CONSERVAR ENERGÍA

5 Maneras de Ahorrar Energía

- Antes de comprar un electrodoméstico nuevo, busca el logo de ENERGY STAR. Estos electrodomésticos consumen de un 10% a un 50% menos de energía. Conoce más en www.energystar.gov.
- Los secadores pueden consumir mucha energía. Recuerda limpiar el filtro de tu secadora luego de cada uso para ahorrar energía.
- Juntos podemos reducir la presión sobre la red eléctrica. Utiliza electrodomésticos grandes, como tu lavaplatos o tu lavadora/ secadora, fuera de los horas pico, antes de las 6:00 p. m. o luego de las 10:00 p. m.

Aquí puedes ver algunos consejos para ayudarte a ti y a tu familia a reducir su uso de energía hoy.

- ¿Cuán fácil es ahorrar energía? Solo apaga todas las luces y equipos electrónicos cuando no estés en casa o cuando no los estés utilizando.
- Las bombillas equivocadas usan mucha energía. Reemplaza las bombillas incandescentes con bombillas LED, las cuales utilizan una fracción de la energía.
- Siguiendo estos consejos para conservar energía, ayúdate a reducir la demanda de la red eléctrica, proteger el ambiente y hasta disminuir tu factura de luz. Conoce más en lumapr.com.

[WEB APP](#)
[LinkedIn](#)
[Facebook](#)
[Twitter](#)
[YouTube](#)

LUMA

LUMA está comprometida con transformar el sistema eléctrico en Puerto Rico para servir mejor a nuestros 1.5 millones de clientes.

El cambio no ocurrirá de la noche a la mañana, pero estamos haciendo avances cada día. En poco más de un año, algunos de nuestros principales logros son:

- Reparar y reemplazar más de 3,000 postes
- Despejar vegetación peligrosa de sobre 300 subestaciones y restaurar 3 subestaciones
- Conectar a más de 25,000 clientes a cubiertas solares, lo que representa sobre 130 MW de energía renovable

Estamos conscientes de que aún queda mucho por hacer, pero los 3,000 hombres y mujeres de LUMA se mantienen enfocados en cumplir nuestra misión de construir la red eléctrica moderna que el pueblo de Puerto Rico espera y merece.



Para conocer más sobre nuestro progreso y sobre nuestro compromiso con reparar, restaurar y reconstruir el sistema eléctrico de Puerto Rico, visítanos en lumapr.com

CONSEJOS PARA CONSERVAR ENERGÍA

Cinco Maneras de Ahorrar Energía

- Antes de comprar un electrodoméstico nuevo, busca el logo de ENERGY STAR. Estos electrodomésticos consumen de un 10% a un 50% menos de energía. Conoce más en www.energystar.gov.
- Las bombillas equivocadas usan mucha energía. Reemplaza las bombillas incandescentes con bombillas LED, las cuales utilizan una fracción de la energía.
- Juntos podemos reducir la presión sobre la red eléctrica. Utiliza electrodomésticos grandes, como tu lavaplatos o tu lavadora/ secadora, fuera de los horas pico, antes de las 6:00 p. m. o luego de las 10:00 p. m.

Aquí puedes ver algunos consejos para ayudarte a ti y a tu familia a reducir su uso de energía hoy.

- ¿Cuán fácil es ahorrar energía? Solo apaga todas las luces y equipos electrónicos cuando no estés en casa o cuando no los estés utilizando.
- Las secadoras pueden consumir mucha energía. Recuerda limpiar el filtro de tu secadora luego de cada uso para ahorrar energía.
- Siguiendo estos consejos para conservar energía, ayúdate a reducir la demanda de la red eléctrica, proteger el ambiente y hasta disminuir tu factura de luz. Conoce más en lumapr.com.

[WEB APP](#)
[LinkedIn](#)
[Facebook](#)
[Twitter](#)
[YouTube](#)

LUMA

LUMA is committed to fundamentally transforming the energy system in Puerto Rico to better serve our 1.5 million customers.

While change will not happen overnight, we are making progress every day. In just over a year, our key accomplishments include:

- Repairing and replacing more than 3,000 power poles
- Clearing hazardous vegetation from 300+ substations; restoring 3 substations
- Connecting 25,000+ customers to rooftop solar representing over 130MW of renewable energy

We know we still have a lot of work left to do, but the over 3,000 men and women at LUMA remain focused on delivering a modern electric grid the Puerto Rican people expect and deserve.



To learn more about our progress, and our commitment to repairing, restoring, and rebuilding Puerto Rico's energy future, visit us at lumapr.com

ENERGY CONSERVATION TIPS

5 Ways to Save Energy

- Before you buy a new appliance, look for the ENERGY STAR logo. These appliances consume 10% to 50% less energy. Learn more at www.energystar.gov.
- Dryers can use a lot of energy. Remember to clean out your dryer filter after each use to save energy.
- Together, we can reduce strain on the electric grid. Use large appliances, like your dishwasher or washer/dryer, during off-peak hours, before 6 p.m. or after 10 p.m.

Here are some tips to help you and your family reduce your energy use today.

- How easy is it to save energy? Simply turn off all lights and electronics when you're not at home and when you're not using them.
- The wrong light bulbs use a lot of energy. Replace incandescent light bulbs with LEDs which use a fraction of the energy.
- By following these conservation tips, you'll help reduce the demand on the electric grid, protect the environment and even lower your energy bill. Learn more at lumapr.com.

[WEB APP](#)
[LinkedIn](#)
[Facebook](#)
[Twitter](#)
[YouTube](#)

LUMA

LUMA is committed to fundamentally transforming the energy system in Puerto Rico to better serve our 1.5 million customers.

While change will not happen overnight, we are making progress every day. In just over a year, our key accomplishments include:

- Repairing and replacing more than 3,000 power poles
- Clearing hazardous vegetation from 300+ substations; restoring 3 substations
- Connecting 25,000+ customers to rooftop solar representing over 130MW of renewable energy

We know we still have a lot of work left to do, but the over 3,000 men and women at LUMA remain focused on delivering a modern electric grid the Puerto Rican people expect and deserve.



To learn more about our progress, and our commitment to repairing, restoring, and rebuilding Puerto Rico's energy future, visit us at lumapr.com

ENERGY CONSERVATION TIPS

Five Ways to Save Energy

- Before you buy a new appliance, look for the ENERGY STAR logo. These appliances consume 10% to 50% less energy. Learn more at www.energystar.gov.
- The wrong light bulbs use a lot of energy. Replace incandescent light bulbs with LEDs which use a fraction of the energy.
- Dryers can use a lot of energy. Remember to clean out your dryer filter after each use to save energy.
- Together, we can reduce strain on the electric grid. Use large appliances, like your dishwasher or washer/dryer, during off-peak hours, before 6 p.m. or after 10 p.m.

Here are some tips to help you and your family reduce your energy use today.

- How easy is it to save energy? Simply turn off all lights and electronics when you're not at home and when you're not using them.
- By following these conservation tips, you'll help reduce the demand on the electric grid, protect the environment and even lower your energy bill. Learn more at lumapr.com.

[WEB APP](#)
[LinkedIn](#)
[Facebook](#)
[Twitter](#)
[YouTube](#)

LUMA

Furthermore, LUMA provides conservation messages to customers around specific events, examples of which were provided in the June 28 TCIR regarding the April 6, 2022, event. In the days that followed said event, LUMA published multiple social media posts encouraging its customers to manage their energy consumption to help reduce demand as LUMA restored the system.

Since the June 28 TCIR, LUMA has continued to proactively provide notice to customers when there is a potential generation shortfall event. When generation shortfalls occur, LUMA encourages its customers to practice prudence in energy consumption, especially during peak hours, and provides tips on how to do so through its social media channels.

In addition to providing conservation-oriented bill insights and event related social media messaging, LUMA has an ongoing social media energy saving campaign, in which it provides energy conservation knowledge and tips that can have a big impact, not only on the environment, but also on a customer's bill. In addition to the examples provided in the June 28 TCIR, LUMA has continued to regularly provide conservation knowledge and tips through its social media channels, examples of which are seen in the images below and on LUMA's social media channels linked above.



LUMAPR.COM

AHORRAR ENERGÍA CONSEJOS



- ✓ Desenchufa tus aparatos cuando estén en desuso.
- ✓ Mantén el filtro de tu secadora limpio.
- ✓ Considera comprar un calentador de agua solar.
- ✓ Inspecciona las tuberías y válvulas para evitar fugas.
- ✓ Apaga las luces cuando salgas de una habitación.



lumapuertorico • Follow

lumapuertorico Para ayudar a reducir la tensión sobre la red eléctrica durante el verano, exhortamos a nuestros clientes a conservar energía, especialmente durante las horas pico entre 6:00 p. m. y 10:00 p. m. Lee estos #consejosparaahorrarenergía que pueden ayudarte a ahorrar energía y dinero.

#Conservaenergía #Ahorraenergía #ConsejosEnergéticos #LUMAPR
5w See translation

9 likes
JULY 11

Add a comment... Post



¿Cómo Conservar energía?

- ✓ Desenchufa tus aparatos cuando estén en desuso.
- ✓ Mantén el filtro de tu secadora limpio.
- ✓ Considera comprar un calentador de agua solar.
- ✓ Inspecciona las tuberías y válvulas para evitar fugas.
- ✓ Apaga las luces cuando salgas de una habitación.



lumapuertorico • Follow

lumapuertorico Conservar energía puede ayudar a manejar la demanda a la red eléctrica, pero también es bueno para ahorrar en tus facturas de luz. Para conocer más sobre cómo puedes mejorar la eficiencia de la electricidad en tu hogar, lee algunos consejos para ahorrar energía aquí: <https://bit.ly/3P0hb1a>

#ConservaEnergía #AhorraEnergía #ConsejosEnergéticos #LUMAPR
5w See translation

4 likes
JULY 12

Add a comment... Post

¿LO SABÍAS?

La etiqueta amarilla Energy Star muestra cuánta energía consumen los electrodoméstico.

También muestra el costo anual de operación estimado.

ENERGY GUIDE

Estimated Yearly Operating Cost: **\$67**

630 kWh Estimated Yearly Electricity Use

LUMA

lumapuertorico • Follow

lumapuertorico LUMA está comprometida con ayudar a nuestros 1.5 millones de clientes a tomar mejores decisiones energéticas.

Si quieres conservar energía y ahorrar en tu factura de luz este verano, una opción es utilizar electrodomésticos que consuman energía eficientemente y que estén certificados por ENERGY STAR. Estos productos consumen menos energía y reducen las emisiones de gas.

Cuando vayas a comprar electrodomésticos, busca las etiquetas amarillas de Energy Guide que muestran estimados de eficiencia y costos. Para más consejos para ahorrar energía, visita nuestra página.

5 likes
JULY 15

Add a comment... Post

- Programa tu aire acondicionado para que se apague a cierta hora
- Apaga todos tus equipos electrónicos cuando no los estés utilizando
- Cierra tus cortinas para combatir el calor
- Toma duchas más cortas y más frías

CONSEJOS PARA AHORRAR ENERGÍA

LUMA

lumapuertorico • Follow

lumapuertorico Durante el verano, sabemos cuán difícil puede ser conservar energía mientras te mantienes refrescado. Por esa razón, queremos compartir algunos consejos para conservar energía aunque estés utilizando tu aire acondicionado.

#LUMAPR #Conservación #Verano
3w See translation

3 likes
JULY 27

Add a comment... Post

Additionally, LUMA posts energy conservation videos such as the July 31, 2022, short video in which LUMA's Vice President of Capital Programs provided tips on ways costumers can conserve energy. This video was shared in LUMA's social media accounts and can be seen in the following links:

- [Instagram Link](#)

- [Facebook Link](#)
- [Twitter Link](#)
- [YouTube Link](#)

Based on the number of customers and social media followers, LUMA projects energy conservation education efforts have the following customer impact:

Customer Bill Inserts: 1.5 million customers

Social Media Channels:

- [Facebook](#): 202,653 followers
- [Twitter](#): 60,222 followers
- [Instagram](#): 21,908 followers
- [LinkedIn](#): 18,213 followers
- [YouTube](#): 312 followers

LUMA understands the need for customers to receive energy conservation education and encourages this Energy Bureau to help LUMA impact more customers by sharing LUMA's energy conservation posts through the Bureau's social media channels. Additionally, LUMA submitted an Energy Efficiency and Demand Response Transition Period Plan for PREB's review on June 21, 2022, under docket NEPR-MI-2021-0006 and is awaiting PREB's review. This Transition Period Plan included an emergency demand response program plan for commercial and industrial customers. LUMA continues preparing for deployment of the programs, while they await approval by the Energy Bureau.