

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

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IN RE: THE UNBUNDLING OF THE
ASSETS OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY

CASE NO. NEPR-AP-2018-0004

**SUBJECT: Request to Postpone the Technical
Conference of September 23, 2022.**

**REQUEST TO POSTPONE THE TECHNICAL CONFERENCE OF
SEPTEMBER 23, 2022**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On March 24, 2022, and pursuant to Section 11.01 of Regulation 8543, Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings (“Regulation 8543”) and Section 3.15 of the Uniform Administrative Procedure Act for the Government of Puerto Rico, Act 38-2017 (“LPAU” for its Spanish acronym) this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Final Resolution and Order in this proceeding (“Final Resolution and Order”). In what is relevant to this Motion, on page 21 of the Final Resolution and Order, this Energy Bureau determined that “further processes” were needed to adopt a standard wheeling services agreement. For this, the Energy Bureau requested stakeholder comments by April 25, 2022, and scheduled a technical conference for May 17, 2022. *See* Final Resolution and Order at page 21.

2. LUMA timely submitted a *Motion for Reconsideration of Final Resolution and Order of March 24, 2022*, submitted on April 13, 2022 (“Motion for Reconsideration”).¹ On April 22, 2022, the Energy Bureau entered a Resolution and Order that accepted LUMA’s Motion for Reconsideration. Thereafter, on July 11, 2022, the Energy Bureau issued a Resolution and Order stating that it would extend for thirty (30) additional days, the timeframe to rule upon LUMA’s Motion for Reconsideration.

3. On August 10, 2022, the Energy Bureau entered a Resolution and Order, whereas it denied LUMA’s Motion for Reconsideration (“August 10th Order”). The Energy Bureau ordered that LUMA submit a formal version of the wheeling customer rider along with a description and rationale for any proposed changes from the draft version provided as Attachment A to the Final Resolution and Order within seven days.² Further, the Energy Bureau granted twenty (20) days for stakeholders to submit comments on relevant issues for wheeling services agreements outlined in Attachment B to the Final Resolution and Order³. Finally, this Energy Bureau scheduled a

¹ Then, on April 20, 2022, LUMA filed a *Request for Stay of Portions of Final Resolution and Order of March 24, 2022, Pending Final Adjudication and Request for Additional Remedies*. LUMA requested this Energy Bureau stay several of the orders included in the Final Resolution and Order until the Motion for Reconsideration is adjudicated (“Request for a Stay”). Specifically, LUMA petitioned that the Energy Bureau stay the portion of the Final Resolution and Order that required LUMA to “file a formal version of the wheeling customer rider as a compliance item . . . with a description of and rationale for any changes proposed from this draft version.” See Final Resolution and Order on page 18. Therein, LUMA contended that there were important and weighty considerations that this Energy Bureau should ponder before implementing the Final Resolution and Order and prior to requiring that LUMA file a formal version of the wheeling customer rider. As such, it was in the public interest to conclude the process of addressing LUMA’s Motion for Reconsideration before LUMA is called upon to file the rider. Thus, LUMA requested that the Energy Bureau stay the order to file a formal version of the wheeling customer rider for at least thirty days after it issues a determination on LUMA’s Motion for Reconsideration.

²² On August 15, 2022, LUMA requested an extension until August 24, 2022, to submit the rider.

³ On August 24, 2022, LUMA submitted its proposed changes to the wheeling rider with this Energy Bureau. See “Motion Submitting Proposed Changes to the Draft Wheeling Customer Rider” (“Submission of Proposed Changes to the Wheeling Rider”). Then, on August 30, 2022, LUMA submitted its responses

Technical Conference for September 23, 2022, to discuss the relevant issues for a wheeling services agreement (“September 23rd Technical Conference”).

4. On August 26, 2022, LUMA submitted a motion styled “Requests Regarding the “Further Processes” Scheduled on the Wheeling Services Agreement, Request for an Agenda for the Technical Conference of September 23rd, and submission of a proposed agenda” (“August 26th Motion”). LUMA requested that this Energy Bureau initiate a new non-adjudicative or “MI” proceeding to discuss the “further processes” required to implement wheeling, including the stakeholder comments on the wheeling services agreement due on August 30, 2022. LUMA also requested that this Energy Bureau issue an agenda of the topics to be discussed in the September 23rd Technical Conference and issue an agenda for the technical conference.

5. LUMA hereby respectfully requests that this Energy Bureau continue or re-schedule the September 23rd Technical Conference for the week of November 7, 2022, and at least one month after PREB approves or issues an agenda for the technical conference so that LUMA will be afforded the time to prepare. As outlined below, pending parallel technical conferences and filing deadlines conflict with the September 23rd Technical Conference, and an agenda has not been approved or issued by the Energy Bureau.

6. First, LUMA anticipates that during the week of September 19th, or in the first half of the week of September 26th, this Energy Bureau will be working on the important and time-intensive task of evaluating LUMA’s submission in Case No. NEPR-MI-2020-0001, *In re Tarifa Permanente de la Autoridad de Energía Eléctrica*, of the quarterly reconciliations and calculated

to the questions for comments included in Attachment B to the Final Resolution and Order. *See* “Motion Submitting LUMA’s Responses to Questions for Comments By Stakeholders Included in Attachment B to the Resolution and Order of March 24, 2022,” filed on August 30, 2022.

factors for the Fuel Charge Adjustment (“FCA”), Purchased Power Clause Adjustment (“PPCA”) and Fuel Oil Subsidy (“FOS”) Riders. *See* Resolution and Order of July 31, 2022, Case No. NEPR-MI-2020-0001.⁴ As per this Energy Bureau’s prior practice and precedents, a technical conference is typically scheduled during the third week of the month (and typically towards the end of the week), and this Energy Bureau typically requests additional information to be submitted either prior to the technical conference and / or shortly thereafter. In said technical conference, LUMA and its personnel are required to discuss the quarterly reconciliations and the calculated factors that the Energy Bureau shall approve to be implemented beginning on October 1, 2022. Accordingly, LUMA’s personnel has budgeted time after September 15, 2022, to prepare to appear at the technical conference and to submit any additional information that the Energy Bureau may require to consider the calculated factors and adopt the quarterly FCA, PPCA, and FOS reconciliations. It is important to underscore that, operationally, the LUMA personnel in charge of the quarterly reconciliations and calculated FCA, PPCA, and FOS factors, are the same persons who work in filings for this unbundling proceeding and would appear on behalf of LUMA at the September 23rd Technical Conference. Given the overlap between the September 23rd Technical Conference and the aforementioned processes in Case No. NEPR-MI-2020-0001, *In re Tarifa Permanente de la Autoridad de Energía Eléctrica*, LUMA respectfully submits that there is just and reasonable cause for this Energy Bureau to postpone the September 23rd Technical Conference for six weeks.

⁴ The filing was due on September 15, 2022 at noon. Due to delays in receiving fuel costs data from PREPA, on September 13, 2022, LUMA requested an extension to file the quarterly reconciliations and calculated factors on September 19, 2022.

7. Second, the September 23rd Technical Conference is also in conflict with other overlapping conferences and filings in several parallel active proceedings before this Energy Bureau, and that were or are scheduled for the last days of August and the month of September:

- i. Case NEPR-MI-2021-004, *In re Review of LUMA's Initial Budgets*- Per a Resolution and Order of August 12, 2022, the Energy Bureau continued *motu proprio*, the technical conference to consider LUMA's Annual Budget for the Fiscal Year 2023 that had been set for August 17, 2022 ("August 12th Annual Budgets Order"). The Energy Bureau re-scheduled the technical conference for September 9, 2022. In turn, the conference was rescheduled for September 13, 2022, per a Resolution and Order of August 19, 2022. In the August 12th Annual Budgets Order, this Energy Bureau issued seven requests for information that LUMA shall answer on August 29, 2022; required LUMA to file by September 6, 2022, the presentation that it will offer in the technical conference; and set a third deadline for September 23, 2022, when LUMA shall submit revised or additional information that the Energy Bureau may request in the technical conference. Currently, per Resolutions and Orders issued on August 19, 2022, and August 25, 2022, LUMA has until September 8, 2022, to submit the presentation for the technical conference and until September 27, 2022, to file revised or additional information that the Energy Bureau may request in the technical conference. Finally, as per a Resolution and Order of August 26, 2022 ("August 26th Order"), LUMA has been required to submit the Quarterly Report for the Fourth Quarter of Fiscal Year 2022 by September 2, 2022, and a submission in response to an order to show cause, by September 6, 2022. Also, per a Resolution and Order of September 6, 2022, LUMA is to submit financial results for the Fourth Quarter of FY 2022 on September 8, 2022. Consequently, in connection with LUMA's Annual Budget for the Fiscal Year 2023, this honorable Energy Bureau's schedule included **one full-day technical conference to be held from 10:00 am through 5:00 pm on September 13, 2022**; and **six (6) deadlines** for LUMA to complete substantive filings in the last week of August and during September.

On August 29, 2022, LUMA submitted its responses to the requests for information issued in the August 12th Annual Budgets Order. On August 30, 2022, LUMA submitted a "Motion for Partial Reconsideration of Resolution and Order of August 26, 2022, and Proposing Alternative Schedule for Submission and Consideration of Financial Actuals," whereby it requested that this Energy Bureau reconsider that portion of the August 26th Order that determined that consideration of the Q4 financial data is necessary to evaluate the FY 2023 Annual Budget that was certified by the Financial Oversight and Management Board for Puerto Rico ("FOMB") and alter the schedule for submission of the Q4 Report; and authorize LUMA to submit its year-end actual financial information on or before October 28, 2022.

- During the technical conference held on September 13, 2022, the Energy Bureau requested LUMA to submit information regarding 18 additional requests for information on or before September 23, 2022. Different components of LUMA personnel have to provide their input in the responses to be provided, such as Operations, Regulatory, Human Resources, and Finance. Moreover, the Energy Bureau ordered the continuation of the technical conference for September 27, 2022.
- ii. Case No. NEPR-MI-2021-0013 *In re Despliegue de Infraestructura de Cargadores para Vehículos Eléctricos*- Per a Resolution and Order of May 19, 2022, on September 1, 2022, LUMA shall file a draft of the First Phase of an EV Charging Infrastructure Deployment Plan (“Phase I EV Plan”); a Compliance Technical Hearing No. 3 is scheduled for September 15, 2022, at 1:00 pm; and the final Phase I EV Plan is currently set to be filed on September 30, 2022. Thus, currently, the schedule before this Energy Bureau for September includes **three (3) events** in this proceeding on the topic of deployment of infrastructure for Electric Vehicles. On September 1, 2022, LUMA requested to postpone the compliance hearing of September 15, 2022, and the concomitant deadline to submit the Final Phase I EV Plan. In a Resolution and Order dated September 7, 2022, this Energy Bureau scheduled the technical conference for October 12, 2022.
 - iii. Case No. NEPR-MI-2019-0007, *In re the Performance of the Puerto Rico Electric Power Authority*- Per a Resolution and Order issued on August 18, 2022 (“August 18th Order”), LUMA shall submit by August 31, 2022, the name of a LUMA representative to meet with the Energy Bureau to discuss reporting on customer monthly peak data metrics. Furthermore, the Energy Bureau directed that LUMA submit by September 1, 2022, an explanation of several performance areas that the Energy Bureau identified in the August 18th Order as showing performance below the applicable baselines and information on corrective actions. Finally, by September 30, 2022, LUMA must file a timeline to report on non-technical losses as well as submit the first bi-monthly report on the status of LUMA’s reporting on non-technical losses. Thus, per an order issued in August, LUMA has been required to submit three (3) filings on this docket in the last days of August and the month of September. In a motion filed on August 26, 2022, LUMA requested that the Energy Bureau extend to October 3, 2022, the deadline of September 1, 2022, to submit explanations on LUMA’s performance with reference to corrective actions. On August 31, 2022, this Energy Bureau determined that LUMA’s submission on underperforming metrics and corrective actions shall be filed on September 20, 2022.
 - iv. Case No. NEPR-AP-2020-0025, *In re Performance Targets for LUMA Energy ServCo, LLC*- LUMA has requested to file on September 21, 2022, a Revised Annex IX to the Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) and supporting testimonies, in compliance with a Resolution and Order of August 1, 2022.

- v. Case No. NEPR-MI- *In re Review of the Puerto Rico Electric Power Authority's 10 Year Infrastructure Plan December 2020*- On or before September 15, 2022, LUMA is set to file the Supplemental 90-Day work plan regarding transmission and distribution programs submitted or to be submitted for approval by the Federal Emergency Management Agency.
- vi. Case No. NEPR-IN-2022-0002, *In re Interrupción de Servicio Eléctrico del 6 de abril de 2022*- As the record of this proceeding shows, LUMA is set to file a circuit breaker failure report on August 26, 2022; a power plant analysis on September 9, 2022; and a root cause analysis on September 23, 2022. To wit, LUMA has been required to submit two (2) technical and specialized filings within the next four (4) weeks.
- vii. Case No. NEPR-IN-2022-0003, *In re Interrupción de Servicio Eléctrico del 17 de agosto de 2022*- Per a Resolution and Order of August 17, 2022, LUMA submitted an incident report on August 31, 2022.

8. Per the aforementioned outline of the current filings and hearings calendar in several proceedings before this Energy Bureau, during the last week of August and the month of September 2022, **four technical conferences and at least eighteen (18) filings** were or are scheduled, including the submission of stakeholders' comments and the September 23rd Technical Conference in this proceeding. This illustration of the regulatory calendar for the coming weeks provides important insights into the overall workload of this Energy Bureau, LUMA, PREPA, and stakeholders. Incidents of overlapping and successive events have occurred in the past, and this Energy Bureau has mindfully postponed or re-scheduled events. *See* Resolution and Order of May 7, 2021, Case No. NEPR-MI-2019-0016, *In re Informes de Progreso de Interconexión de la Autoridad de Energía Eléctrica* (postponing compliance hearing set for May 17, 2021, due to conflicts with other proceedings with this Energy Bureau); Resolution and Order of May 7, 2021, Case No. NEPR-MI-2021.006, *In re Demand Response Plan Review, Implementation and Monitoring* (rescheduling technical conference bases on conflicts with other proceedings); Resolution and Order of May 5, 2021, Case No. NEPR-MI-2020-0016, *In re Optimization Proceeding of MiniGrid Transmission and Distribution Investments* (postponing two technical

workshops to allow the Energy Bureau to analyze information submitted by stakeholders thoroughly); Resolution and Order of May 14, 2021, Case No. NEPR-2020-0025, *In re Performance Targets for LUMA Energy ServCo LLC* (amending procedural calendar *motu proprio* in attention to the pendency of parallel proceedings in Case No. NEPR-MI-2019-007).

9. It is respectfully submitted that when overlapping submissions and events are scheduled, the need for the procedural calendars and due dates to change on or close to a deadline increases because the parties to proceedings, stakeholders, and this Energy Bureau, are not able to deploy their time and efforts to fulfill their duties fully, and processes become less efficient. LUMA, in good faith, proposes that a planning and scheduling approach that involves parties and stakeholders in setting short, medium-term, and long-term agendas on the regulatory topics that will be addressed by this Energy Bureau each quarter, semester, or year, will serve to streamline processes, enable the parties to comply timely with the orders of this Energy Bureau, ensure that the parties and stakeholders have sufficient time to work on topics and matters that have been prioritized, and further efficiencies. Moreover, a scheduling proceeding or scheduling meetings will further the common goal of adopting reasonable timeframes to secure compliance with energy public policy goals and related legal mandates. To that end, LUMA will submit forthwith to this Energy Bureau a proposal to open a scheduling docket where stakeholders and those entities that this Energy Bureau supervises and regulates can engage in collaborative discussions with this Energy Bureau regarding schedules for active proceedings.

10. LUMA respectfully requests that this Energy Bureau consider the aforementioned summary of the current schedule and timeline of filings across several active dockets to ascertain that even with several dedicated teams spanning regulatory, operations, and other components of

LUMA's operations and workforce, it is not feasible to comply simultaneously with the overlapping deadlines and appear for the technical conferences that are scheduled in the aforementioned active and parallel proceedings. LUMA respectfully posits that there is a material benefit for all of those concerned to prioritize proceedings and deadlines for the Annual Budgets, the filing of the FCA, PPCA, and FOS quarterly reconciliations and calculated factors, the revised Annex IX to the T&D OMA, and the filing of the investigation reports outlined above. To wit, LUMA will propose in each of the relevant dockets and this Motion, that several other deadlines and technical conferences be re-scheduled for the last week of September and into October and November 2022. This will allow all the parties concerned to concentrate on a group of filings and appearances at technical conferences requiring considerable time and resources during September to address other matters, without delay, in October and November.

11. LUMA proposes collaborative solutions to minimize overlapping filings and conferences and allow for sufficient time between filings and appearances at technical conferences for personnel to prepare and comply with the orders of this Energy Bureau. In turn, this will reduce the need for piecemeal requests to extend times for submissions or re-schedule conferences.

12. Finally, a continuance of the September 23rd Technical Conference will afford this Energy Bureau the opportunity to consider the requests for relief stated in LUMA's August 26th Motion to open a new non-adjudicative proceeding to evaluate the wheeling services agreement and LUMA's proposed agenda for the Technical Conference that is currently scheduled for September 23rd. LUMA respectfully submits that it is beneficial to the parties and stakeholders for this Energy Bureau to issue the agenda for technical conferences in this highly complex and important proceeding at least one month prior to the date set for a technical conference. The prior

notice of one month will reasonably allow LUMA and stakeholders to budget time to appear for a technical conference, be prepared to provide the Energy Bureau with considered input, and readily answer questions from the Energy Bureau and its consultants. In what behooves LUMA, and as this Energy Bureau is aware, LUMA has a team of its personnel assigned to this proceeding and also works with third-party consultants. The third-party consultants understandably has parallel commitments regarding other professional engagements. Thus, a timeframe of a month for third-party consultant and LUMA to allocate time in their calendars to appear at a technical conference and, importantly, to evaluate the agenda and prepare accordingly, is necessary and reasonable. Having an agenda with topics one month in advance of the technical conference will also allow LUMA and stakeholders to prepare supporting materials and testimony for the technical conference,.

13. In view of the above, LUMA respectfully requests that the Energy Bureau postpone the September 23rd Technical Conference for the week starting on November 7, 2022. As stated previously, a technical conference is scheduled for October 12, 2022, in Case No. NEPR-MI-2021-0013 *In re Despliegue de Infraestructura de Cargadores para Vehículos Eléctricos*, to discuss LUMA's draft EV Phase 1 Plan. LUMA respectfully requests that this Energy Bureau schedule the technical conference in this proceeding for at least three weeks after the technical conference on the EV Phase 1 Plan is held.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of this Motion, **grant** LUMA's request to postpone the September 23rd Technical Conference to the week of November 7th and **issue** an agenda for the technical conference at least one month in advance of said conference.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of September 2022.

I hereby certify that this Motion was filed in the electronic docket of the Puerto Rico Energy Bureau and that a stamped copy of this Motion will be served via electronic mail to intervenors: Cooperativa Hidroeléctrica de la Montaña, via Ramón Luis Nieves, ramonluisnieves@rlnlegal.com; Office of the Independent Consumer Protection Office, Hannia Rivera, hrivera@jrsp.pr.gov, and Pedro E. Vázquez Mélenlez, contratistas@jrsp.pr.gov; Puerto Rico Manufacturer's Association via Manuel Fernández Mejías, manuelgabrielfernandez@gmail.com; and Ecoeléctricas via Carlos Colón, ccf@tcm.law. It is also certified that I will serve notice of this motion to counsel for the Puerto Rico Electric Power Authority, Katuska Bolaños, kbolanos@diazvaz.law, and Joannely Marrero Cruz, jmarrero@diazvaz.com.

I will also send a copy of this Motion to the following individuals or entities that the Energy Bureau included in its email:

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