

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

NEPR Received: Sep 30, 2022 7:10 PM
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IN RE: WIND DEVELOPMENT STUDY

CASE NO.: NEPR-MI-2021-0015

SUBJECT: Submission of Wind Study Report

MOTION SUBMITTING WIND STUDY REPORT

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW LUMA Energy ServCo, LLC (“ServCo” or “LUMA”), and, through the undersigned legal counsel, respectfully submits the following:

1. On August 24, 2020, this Honorable Energy Bureau (“Energy Bureau”) issued a Final Resolution and Order approving an Integrated Resources Plan (“IRP”) and Modified Action Plan (“August 24th Order”) in Case No. CEPR-AP-2018-0001. As part of the August 24th Order, the Energy Bureau ordered the Puerto Rico Electric Power Authority (“PREPA”) to address specific action items for the next IRP review cycle (*see* August 24th Order, p. 285, ¶ 911), including to:

- Conduct an offshore wind study tailored to Puerto Rico’s wind resource and the electric grid that evaluates the cost, generation profile, and other characteristics of anchored and floating wind turbine options;
- Properly and fully account for market-based costs and evening peak performance of onshore wind resources, and especially considering the performance of onshore wind resources designed for “low wind” regimes, using the most up-to-date information available; and
- Properly and fully account for market-based costs and evening peak performance of offshore wind resources, using the most up-to-date information available.

(*Id.* pp. 286-287, ¶ 915.) The study described above will hereinafter be referred to as the “Wind Study.”

2. On July 23, 2021, this Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2020-0012, *In Re: Implementation of the Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan* (“July 23rd Order”), ordering PREPA and LUMA to, among others, file by September 15, 2022 a Gantt Chart showing the timeline for the completion of the Wind Study and information gathering necessary to comply with the August 24th Order (“Gantt Chart”), attend a virtual technical conference on September 21, 2021 to discuss the steps to timely comply with the Wind Study requirement (“Virtual Technical Conference”), and file by September 17, 2021, a copy of a Presentation to be made during the Virtual Technical Conference.

3. After other procedural events¹, on September 15, 2021, the Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2020-0012 (“September 15th Order”) in which it (a) clarified that LUMA is responsible for complying with the implementation of all required activities related to the Wind Study before the Energy Bureau, (b) rescheduled the Virtual Technical Conference to October 1, 2021, and (c) modified the deadlines to submit the Gantt Chart and the Presentation for the Virtual Technical Conference to September 24 and September 28, 2021, respectively.

4. On September 17, 2021, this Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2020-0012 initiating the instant proceeding to evaluate the development of the Wind Study.

¹ On September 10, 2021, LUMA and PREPA filed a *Joint Motion Requesting Clarification of a Portion of the Energy Bureau’s Resolution and Order of July 23, 2021*, in Case No. NEPR-MI-2020-0012. LUMA requested the Energy Bureau to clarify that it was the entity responsible for implementing the required activities related to the Wind Study.

5. On September 24, 2021, in compliance with the July 23rd and September 15th Orders, LUMA submitted the Gantt Chart, as well as a copy of the presentation for the Virtual Technical Conference in PDF format (the “Wind Study Presentation”). In these documents, the submittal of the final report of the Wind Study to the Energy Bureau was proposed for the end of September 2022.

6. On October 1, 2021, LUMA appeared at the Virtual Technical Conference wherein the Wind Study Presentation was given by representatives of LUMA and the National Renewable Energy Laboratory (“NREL”), a national laboratory of the U.S. Department of Energy (“DOE”), Office of Energy Efficiency and Renewable Energy. During the Virtual Technical Conference, LUMA explained that the Wind Study would be prepared by NREL² with the collaboration of LUMA and other stakeholders. In addition, LUMA requested the Energy Bureau to designate a representative or liaison to be involved in the planning process for the Wind Study and the Energy Bureau designated a liaison (as this individual changed through time, the “PREB Liaison”).

7. On July 13, 2022, representatives from NREL distributed a preliminary draft of the Wind Study Report to various stakeholders and subject matter experts for peer review with the request to review the report and respond with comments. The PREB Liaison was included in this stakeholder group and received a copy of the report for review.

8. On September 27, 2022, LUMA informed the Energy Bureau that (i) the Wind Study had been completed, (ii) NREL had prepared an almost final draft of the report of this study; (iii) LUMA had collaborated in the development of this study and review of a draft report; (vi) LUMA understood the next step from NREL would be to issue this report in final; and (iv) as soon as LUMA received this report – an action outside LUMA’s control- LUMA would proceed to

² Therefore, this study was to be, and was, funded by DOE.

submit the final report of the Wind Study to this honorable Energy Bureau. *See Informative Motion Regarding Wind Study Report* filed by LUMA on that date.

9. Now, in compliance with the August 24th Order, LUMA hereby submits to this honorable Energy Bureau the final report of the Wind Study prepared by NREL titled “Wind Energy Costs in Puerto Rico Through 2035” (the “Wind Study Report”). *See* Exhibit 1. The preparation of this report involved interviews with key stakeholders, and the PREB Liaison was invited to participate in various aspects of the planning process and, as mentioned, to peer review a draft of this report. The Wind Study Report will inform the IRP, as well as the Puerto Rico Grid Resilience and Transition to 100% Renewable Energy Study (“PR100 Study”) that is being conducted by the DOE.³

10. LUMA respectfully proposes that this honorable Energy Bureau hold a technical conference to discuss the Wind Study Report. NREL representatives have expressed to LUMA their disposition to participate in such a conference.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the Wind Study Report in Exhibit 1 herein, and **deem** LUMA in compliance with the provisions of the August 24th Order pertaining to the preparation of the Wind Study for the next IRP cycle.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of September 2022.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion to the attorneys for PREPA,

³ This study is being conducted by DOE in partnership with the Federal Emergency Management Agency and DOE national labs, including NREL (*see* Exhibit 1, Section 2, p. 2) and is a study that “represents a comprehensive effort to evaluate pathways to a 100% clean energy future in Puerto Rico” (*see id.*) and will “build on” the work in the Wind Study Report (*see id.*).

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EXHIBIT 1

Final Report of Wind Study

Wind Energy Costs in Puerto Rico Through 2035

<https://www.nrel.gov/docs/fy22osti/83434.pdf>