

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

NEPR

Received:

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IN RE:
INFORMES DE PROGRESO DE
INTERCONEXIÓN DE LA AUTORIDAD
DE ENERGÍA ELÉCTRICA DE PUERTO
RICO

CASE NO. NEPR-MI-2019-0016

SUBJECT:

Motion Submitting Responses in Compliance with
Bench Order Issued at the Hearing Held on October
28, 2022

**MOTION SUBMITTING RESPONSES
IN COMPLIANCE WITH BENCH ORDER ISSUED AT
THE HEARING HELD ON OCTOBER 28, 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. The captioned proceeding involves oversight by this Honorable Puerto Rico Energy
Bureau (“Energy Bureau”) of procedures to handle requests for interconnections of distributed
generation systems and microgrids to the Transmission and Distribution System (“T&D System”),
pursuant to Acts 57-2014 and 17-2019.

2. Since July 2020, this Energy Bureau has required that the Puerto Rico Electric
Power Authority (“PREPA”) submit quarterly progress reports on interconnections. *See*
Resolution and Order of July 21, 2020. The docket of this proceeding also reveals that the Energy
Bureau has held several compliance hearings.

3. On May 7, 2021, the Energy Bureau issued a Resolution and Order in which it took
notice of the transition process underway between LUMA and PREPA (“May 7th Resolution and

Order”). On June 1, 2021, LUMA assumed its role as Operator of the T&D System per the terms of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated June 22, 2020, as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement. In the May 7th Resolution and Order, the Energy Bureau ordered that LUMA shall file the quarterly progress reports that the Energy Bureau has required in this proceeding. *See* May 7th Resolution and Order on page 1.

4. On August 27, 2021, this Energy Bureau issued a Resolution and Order directing LUMA to file a copy of the presentation to be offered in every compliance hearing with every Interconnections Progress Report. On September 15, 2022, the Energy Bureau entered a Resolution and Order instructing LUMA to submit the presentation for the Technical Conference, on or before October 26, 2022, at noon. The Energy Bureau set the Technical Conference for October 28, 2022.

5. On October 28, 2022, the compliance hearing for this instant proceeding was held. During the presentation, the Commissioners made a request for information from the LUMA representatives. The Energy Bureau ordered LUMA to provide its responses on or before November 1, 2022, at 5 p.m.

6. In compliance with the October 28th Bench Order, LUMA respectfully requests that this Energy Bureau receive and accept the response to the request for information in presentation format submitted as Exhibit 1 to this Motion. LUMA also includes an Excel Spreadsheet as Exhibit 2 to the Motion.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the response to the request for information in presentation format, included herein as Exhibit 1 to this Motion, and an Excel Spreadsheet as Exhibit 2 to the Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this November 1st 2022.

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; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law. Notice will also be sent to the Office of the Independent Consumer Protection Office, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and to counsel for the Puerto Rico Solar Energy Industries Association Corp. (“SESA”), javrua@sesapr.org.



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/s/ Yahaira De la Rosa Algarín
Yahaira De la Rosa Algarín
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Exhibit 1

The LUMA logo is displayed in a dark blue, bold, sans-serif font. The letter 'A' is stylized with a white sunburst or starburst pattern radiating from its top right corner. The logo is positioned in the upper left quadrant of the page, set against a background of a white utility truck with a green stripe and another LUMA logo on its side. The truck is viewed from a low angle, showing its side mirror and front grille. The background is a mix of green and white geometric shapes, with a white sunburst pattern in the bottom right corner.

LUMA

LUMAPR.COM

Informe de Progreso de Interconexión de Sistemas de Generación Distribuida Casos Regulares

Trimestre Julio a Septiembre 2022

NEPR-MI-2019-0016

1 de noviembre de 2022

Número de Clientes de Flujo Regular con Medición Neta

Información Adicional	
Promedio para autorización de interconexión*	863 días
Clientes conectados en menos de 90 días	5%

Solo un caso de flujo regular dentro del periodo se interconectó en menos de 90 días.

*Desglose por tamaño en la página 9

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022

Solicitudes de Interconexión por Tipo de Proyecto de Flujo Regular

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022

Tipo de Solicitud	Jul – Sep 2022
Flujo Expedito (<25 kW)	10,413
Flujo Regular (<25 kW)	8
Mayores de 25 kW	19
Total	10,440

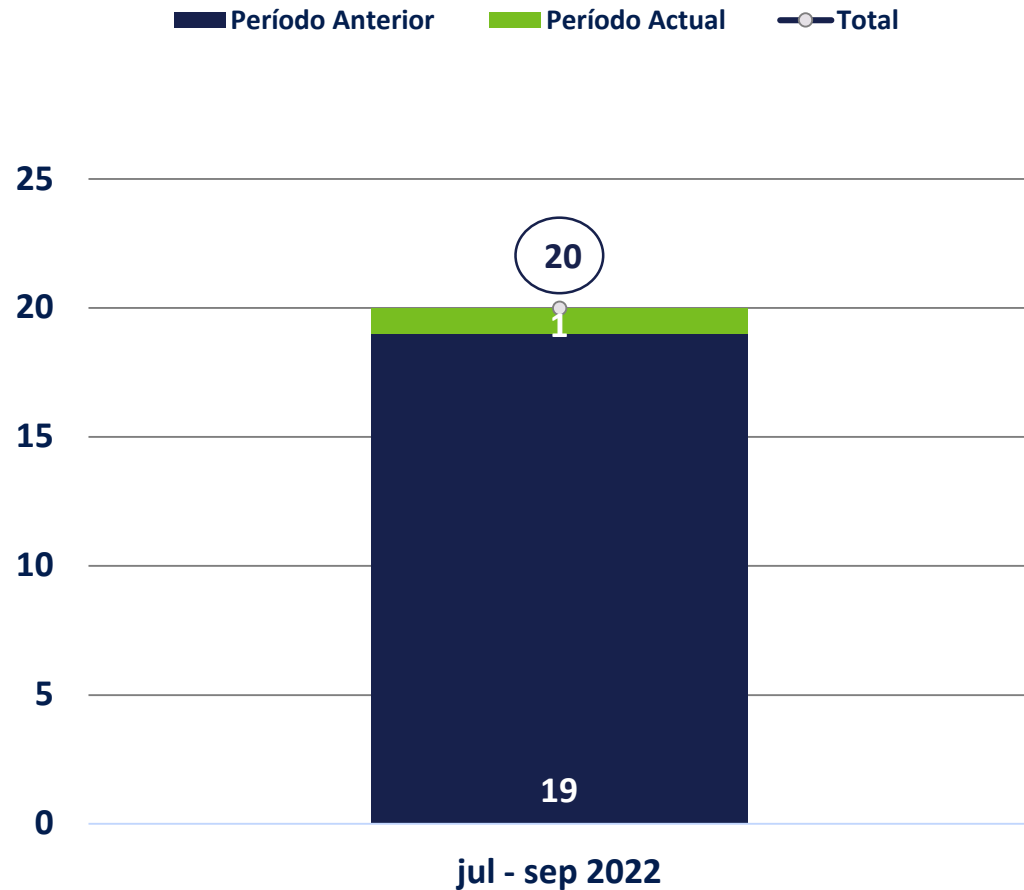
0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022

Solicitudes de Interconexión por Tipo de Cliente de Flujo Regular

Tipo de Cliente	Jul – Sep 2022
Residencial	10,405
Comercial	35
Total	10,440

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022

Nuevos Clientes con Medición Neta de Flujo Regular

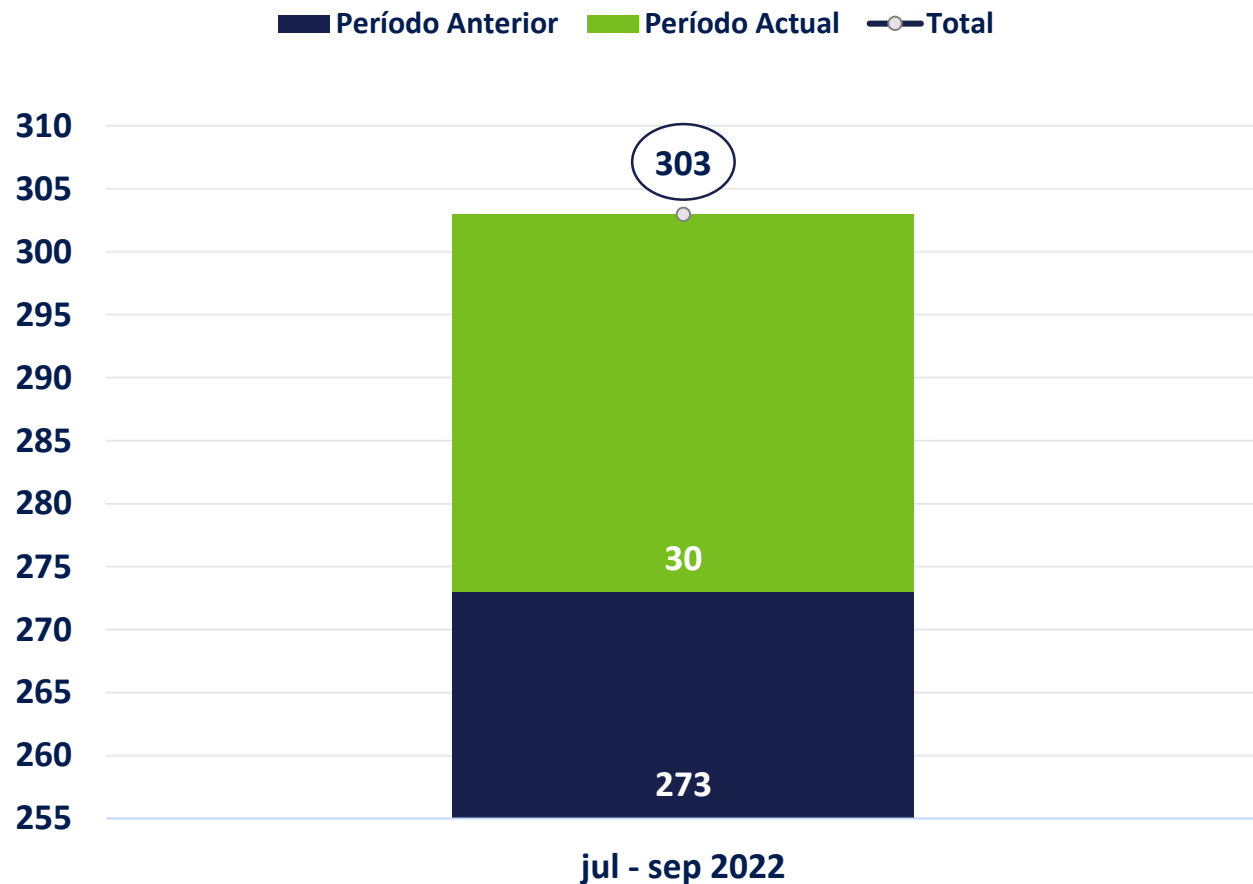


Desde sus comienzos, LUMA se ha enfocado en interconectar casos expeditos según requerido por ley. No obstante, LUMA continua con sus esfuerzos en minimizar los casos categorizados backlog. Estos casos, mayores de 25 KW, LUMA ha interconectado la misma cantidad de solicitudes nuevas, disminuyendo el backlog.

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022



Solicitudes Pendientes de Medición Neta de Flujo Regular



Información Adicional	
Balance pendiente de casos regulares, >25kW.	181 111 (61%) pendiente a acción del cliente
Balance pendiente de casos regulares, <25kW	122 70 (57%) pendiente a acción al cliente

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022

Información sobre Tiempos Promedio para Interconexión Flujo Regular y Medidores Bidireccionales

Requerimiento	Información
Promedio para autorización de interconexión de los sistemas menores de 25 kW (regulares).	49 días
Promedio transcurrido que cliente notifica a LUMA la interconexión de su sistema mayor de 25 kW y que se refleja el acuerdo en la factura.	906 días 18 de los 19 casos interconectados son casos sometidos previo a LUMA. El caso sometido bajo LUMA tomó 165 días para interconectar.
Más de noventa (90) días de espera para reflejar el acuerdo en factura, posterior a la notificación de interconexión en el Portal.	95% Clientes
Cantidad de medidores bidireccionales disponibles en los almacenes.	LUMA tiene suficiente inventario para satisfacer demanda. Al final del trimestre, había unos 12,080 metros bidireccionales en almacén.

0.2% del total de las solicitudes sometidas fueron de flujo regular durante julio – septiembre 2022



LUMA



Gracias



Exhibit 2
(to be submitted via email)