

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

NEPR

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**IN RE: DESPLIEGUE DE
INFRAESTRUCTURA DE CARGADORES
PARA VEHICULOS ELECTRICOS**

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Submittal of Project Schedule in
Compliance with Resolution and Order of January 13,
2023 and Requesting Modification of Certain Deadlines
Thereunder**

**MOTION SUBMITTING PROJECT SCHEDULE IN COMPLIANCE WITH
RESOLUTION AND ORDER OF JANUARY 13, 2023 AND REQUESTING
MODIFICATION OF CERTAIN DEADLINES THEREUNDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES now **LUMA Energy ServCo, LLC** (“LUMA”), through the undersigned legal counsel, and respectfully states and requests the following:

I. Procedural Background

1. On January 13, 2023, this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (the “January 13th Order”) making various findings and determinations regarding the Draft Phase I Electric Vehicle Plan (“Phase I EV Plan”) filed by LUMA on September 1, 2022¹ and the Revised Draft Electric Vehicle

¹ See LUMA’s *Motion Submitting Draft Phase I EV Plan and Request to Postpone Compliance Technical Hearing No. 3 and Concomitant Deadline to Submit Revised Phase I EV Plan* of that date (“September 1 Motion”) and its Exhibit 1. On September 2, 2022, LUMA resubmitted the Phase I EV Plan document with certain technical repairs and requested this Energy Bureau to accept this corrected version in substitution of the version submitted on September 1, 2022 (*see* LUMA’s *Motion Re-Submitting Exhibit 1 Filed on September 1, 2022 with Technical Repairs and Requesting Substitution of Original Exhibit* of that date) which substitution was accepted by this Energy Bureau by Resolution and Order of September 7, 2022. The term “Phase I EV Plan” as used in this Motion refers to this corrected version.

Rate Design Proposal (“Interim EV TOU Rate”) filed by LUMA on July 21, 2022², as well as issuing associated orders.³

2. In the January 13th Order, this Energy Bureau orders LUMA to file by April 30, 2023 a revised Phase I EV Plan incorporating the guidance in the January 13th Order and containing plans for future updates (*see* January 13th Order at page 14), including addressing various subjects and requirements in the areas of low-income customer barriers, federal funding, reporting metrics and cost recovery (*see id.* at pages 2-9). In addition, the Energy Bureau approves the Interim EV TOU Rate subject to modifications set forth in the January 13th Order and orders LUMA to finish development of and launch the Interim EV TOU Rate by September 30, 2023. *See id.* at pages 9, 10 and 14.

3. In the January 13th Order, the Energy Bureau also orders LUMA to take several actions associated with the Phase I EV Plan and the Interim EV TOU Rate, including to: (a) submit by February 10, 2023 a Project Schedule for implementation of the Interim EV TOU Rate (*see id.* at pages 11 and 14) (the “Project Schedule”); (b) “immediately” issue a request for proposals for requisite vendors related to the work needed to integrate collected data into LUMA’s billing system (*see id.* at page 10) (the “Charging Consumption Data RFP”); (c) report every thirty (30) days on the progress with the data collection and billing to integrate the Interim EV Rate (“Billing Integration Reports”); (d) “to the extent necessary to implement the Interim EV TOU Rate in full” issue a request for proposals no later than February 15, 2023 “inviting any requisite external vendors and partners to submit bids to provide services to LUMA” (the “Rate Implementation Support RFP”) and give proponents until March 13, 2023 to submit their proposals (*see id.* at page

² *See* LUMA’s *Motion Submitting Revised EV Rate Design Proposal* of that date and its Exhibit 1.

³ On that same date, the Energy Bureau also issued a *Resolution Nunc Pro Tunc* correcting *motu proprio* a clerical error related to two deadlines set forth in the January 13th Order. The discussion of the January 13th Order in this motion considers these corrections.

11); (e) in connection with low-income customers and disadvantaged communities, “[o]ver the next six months, review and propose improvements to its outreach and public access policies and practices [...] and submit a memorandum to the Energy Bureau setting out the actions it plans to adopt” (*id.* at pages 3 and 14) (the latter, the “Customer Outreach Memorandum”); (f) “[o]ver the next nine months, engage in outreach with low-income and disadvantaged communities to determine what they consider their transportation electrification priorities to be” (“Customer Outreach Implementation”) (*id.* at pages 4 and 14); and (g) “[u]pdate data collection and analysis methods related to the planning and design of its successor EV TOU Rate in its next rate proceeding or within 24 months of the issuance of this order” (*id.* at page 14; *see also id.* at pages 10 and 12).

4. With respect to the Project Schedule, the January 13th Order requires that it:

[...] (i) detail[...] each task that LUMA has identified as being important to align with the rollout of the EV TOU Rate, (ii) articulate[...] precisely what other partners, programs, initiatives, etc. must be engaged to proceed with the EV Plan, and when it expects to engage with them, (iii) specif[y] how LUMA will conduct the RFP for data collection and billing integration methods and costs, and (iv) specif[y] a timeline for LUMA's cost-benefit analysis as it decides how to implement the requisite enhancements to its IT and billing systems.

See id. at page 11.

5. On February 9, 2022, LUMA submitted a *Motion Requesting Brief Extension to File Project Schedule Required by Resolution and Order of January 13, 2023 and Submitting Progress Report Due By February 13, 2022 and Information on Status of RFP Due by February 15, 2023 under Such Resolution and Order* (“February 9th Motion”). In the February 9th Motion, LUMA: (i) requested this honorable Energy Bureau an extension of the deadline to submit the Project Schedule by seven (7) calendar days from the original deadline- that is, by February 17, 2023 (*see* February 9th Motion at pages 3-5); (ii) informed that the billing integration efforts had

not commenced and therefore there were no concrete steps to be reported at the time and requested that LUMA be deemed in compliance with the Billing Integration Reporting requirement with respect to the report due by February 13, 2023 (*see id.* at pages 4-5); and (iii) take notice that the Rate Implementation Support RFP required under the January 13th Order “to the extent necessary to implement the Interim EV TOU Rate in full” was determined by LUMA to be unnecessary for such purposes and will therefore will not be issued (*see id.* at page 5).

6. By Resolution and Order notified on February 14, 2023 (“February 14th Resolution and Order”), the Energy Bureau: (i) approved LUMA’s request to extend the deadline to file the Project Schedule until February 17, 2023 (*see* February 14th Resolution and Order at page 2); (ii) acknowledged LUMA’s statement regarding the Billing Implementation Report and ordered LUMA to present a report commencing on March 13, 2023 and “every 30 days thereafter with progress on data collection and billing to integrate the Interim EV Rate” (*see id.*); and (iii) ordered LUMA to file on or before fifteen (15) days “a detailed explanation of its request to not issue the RFP ordered by the Energy Bureau” (*id.*).

II. Submittal of Project Schedule

7. In compliance with the January 13th Order, and as per the extension granted in the February 14th Resolution and Order, LUMA submits herein the Project Schedule. *See Exhibit 1.* The Project Schedule addresses the tasks to meet the various requirements relating to the Phase I EV Plan and the development and launch of the Interim EV TOU Rate, including the necessary actions to proceed with the Phase I EV Plan and the Charging Consumption Data RFP, as well as the timeline to implement requisite enhancements to the IT and billing systems. Exhibit 1 also includes, as a preamble to the Project Schedule, LUMA’s observations, comments, and explanations.

8. LUMA respectfully submits that this Project Schedule is a roadmap to implementation and the pursuit of the necessary activities to comply with the January 13th Order; however, these activities will inevitably be affected by funding availability, market uncertainties (e.g., challenges in estimating and measuring the degree of LUMA influence on incremental EV sales and uncertainty around participation rates and participant behavior change), existing billing and IT systems uncertainties and limitations (e.g., uncertainties in implementing an innovative methodology of receiving billing determinants from a third-party, undertaking several modifications to the billing system to address this and other rate changes related to other dockets, and unforeseen complications from implementing changes to a system that is still remediating) and potential procurement hurdles or delays, among other variables discussed in Exhibit 1. Therefore, changes to the Project Schedule may be needed as the activities progress.

9. For the reasons indicated in the February 9th Motion, the Project Schedule in Exhibit 1 does not include Rate Implementation Support RFP. LUMA will submit a detailed explanation of why this RFP was determined to be unnecessary, as required and by the deadline established in the February 14th Resolution and Order.

III. Deadline Modification Requests

10. As explained in LUMA's comments and explanations and indicated in the Project Schedule in Exhibit 1, LUMA respectfully submits that the deadlines or timeframes for issuing the Charging Consumption Data RFP, submitting the Customer Outreach Memorandum, conducting the Customer Outreach Implementation, and launching the Interim EV TOU Rate established under the January 13th Order do not consider or allow sufficient time for the necessary pre-requisite work to complete these actions.

11. Specifically, LUMA estimates that it will be able to issue the Charging Consumption Data RFP (*see* task 14 of the Project Schedule) by mid to late March 2023 (rather than “immediately”), given the need to comply with the various required steps and processes to prepare and get the RFP approved internally for issuance in accordance with LUMA’s required procurement processes and the current volume of active procurements. In this regard, LUMA understands that using the existing billing and IT systems will allow the tariff to be implemented in the near term without significant required investment in a Meter Data Management System and AMI meters.

12. In addition, LUMA has determined that it does not currently have the internal capabilities or employees with the relevant training to conduct the necessary research and analysis of the outreach and public access policies and practices required under the January 13th Order (*see* tasks under section A of the Project Schedule) and, therefore, it will need to procure third-party support for such purposes. Considering the time needed to conduct the procurement for this research provider and for this research provider to conduct the necessary research and analysis, LUMA estimates that it will complete the resulting Customer Outreach Memorandum mid to late September 2023. Since completion of the Customer Outreach Memorandum is a predecessor to the Customer Outreach Implementation activities, LUMA also estimates that Customer Outreach Implementation will commence in late September 2023. As shown in the Project Schedule (*see* task 8 of the Project Schedule), these customer outreach and engagement efforts will be ongoing throughout implementation of the program.

13. As explained in Exhibit 1 and reflected in the Project Schedule included therein, in addition to the tasks related to EV charging consumption data (including the Charging Consumption Data RFP described above) and the Rate Implementation Support RFP and

implementation efforts (covered in subsections C-1 and C-2 of the Project Schedule, respectively), LUMA has identified a series of other tasks that must be completed prior to or in connection with the launch of the Interim EV TOU Rate, including: (i) customer outreach for awareness of or enrollment in the tariff (covered in subsection C-3 of the Project Schedule), for which the procurement of an external vendor will also be required, and (ii) the development of a tariff sheet and associated bill changes and the Energy Bureau's review and approval thereof, customer registration, and issuance of the revised bills (all of these covered in subsection C-4 of the Project Schedule). Based on the estimated timeframes for these tasks, LUMA estimates that the launch of the customer registration would occur around the end of September 2023 and all of the necessary tasks to be able to commence billing under the Interim EV TOU Rate would be completed by the end of November 2023. LUMA respectfully proposes, however, that billing should not begin until a minimum threshold number of customers have registered for the rate, which threshold would be proposed and justified in the Final Phase I EV Plan. Therefore, LUMA respectfully submits that billing under the Interim EV TOU Rate should commence near the end of November 2023 or sixty (60) days following the month when the minimum customer enrollment threshold is reached, whichever is later.

14. Considering the above, LUMA respectfully requests this honorable Energy Bureau to modify the deadlines or timeframes in the January 13th Order for the issuance of the Charging Consumption Data RFP, the Customer Outreach Memorandum, the Customer Outreach Implementation, and the launch of the Interim EV TOU Rate to take into account the tasks, processes and variables and associated timeframes discussed above and in Exhibit 1. LUMA respectfully submits that the modified deadlines or timeframes proposed herein are the earliest estimated dates to complete these actions taking into consideration all the necessary pre-requisite

work to be diligently and responsibly undertaken by LUMA and inputs provided by stakeholders on constraints and market barriers. These modified deadlines or timeframes do not affect the deadline to submit the Final Phase I EV Plan (which would remain the same) or substantially change the deadline for implementation of the Interim EV TOU Rate (which could occur as early as sixty (60) days from the end of September 2023)- that is by the end of November 2023. Therefore, LUMA respectfully submits that these modified deadlines are reasonable and will not cause undue delay in this proceeding. LUMA also respectfully submits that the deadlines and timeframes set forth in the January 13th Order were determined without considering all the necessary tasks, processes, and variables to achieve the activities ordered or required thereunder and which information is critical to ensure these deadlines and timeframes are realistic, reasonable and achievable. Accordingly, LUMA respectfully submits that the information provided by LUMA herein (and Exhibit 1) should form part of the assumptions supporting the timeframes and deadlines of the tasks required or ordered under the January 13th Order to ensure that these are reasonable and nonarbitrary administrative actions. This is particularly important with respect to the subject of electric vehicle infrastructure where there is no specific Puerto Rico legal or regulatory framework, and this is a new type of initiative in Puerto Rico. In this regard, the Puerto Rico Supreme Court has held that the exercise of discretion by an administrative agency must be rooted in reasonableness and in accordance with applicable law. *See e.g., Ramírez v. Policía de PR*, 158 DPR 320, 339 (2003).

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and of the matters discussed in **Exhibit 1**; **accept and approve** the Project Schedule attached as **Exhibit 1**; **deem** LUMA in compliance with the requirement to file the Project Schedule under the January 13th Order; and **grant** LUMA's request to modify the following

deadlines or timeframes in the January 13th Order: (a) the deadline to issue the Charging Consumption Data RFP to mid to late March 2023 (rather than “immediately”); (b) the timeframe to conduct the outreach research and analysis and submit the Customer Outreach Memorandum to the Energy Bureau to the next nine (9) months (instead of the next six(6) months); (c) the timeframe for the Customer Outreach Implementation to provide it will commence by the end of September 2023 (rather than completion within the next nine (9) months); and (d) the deadline to commence the billing integrating the Interim EV TOU Rate (interpreted to be the time of implementation or launch of the Interim EV TOU Rate) to the end of November 2023 or sixty (60) days following the date when customer enrollment has reached a minimum threshold number of customers, whichever occurs later (instead of providing that this rate would be launched by September 30, 2023).

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 17th day of February 2023.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic courtesy copy of this motion to the attorney for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law. LUMA understands that other participants or stakeholders in this proceeding will be notified as a result of the publicity of the filings in this process. Notwithstanding, LUMA will send a courtesy copy of the filing to the following stakeholders: agalloza@aggpr.com; alberto.cortes@warrendelcaribe.com; aldo@skootel.com; angel.d.rodriguez@outlook.com; antonio@velocicharge.com; apietrantoni@pmalaw.com; azayas@azeng.net; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com; carlosxcdeno@gmail.com; clrivera@caguasexpressway.com; flota@caguasexpressway.com; cnegrette@solrenew.com; CR.Tejera@ddec.pr.gov; dacosta@aggpr.com; daniel.perez@totalenergies.pr; dcordero@group-em.com; direxec@ciapr.org; divine.energy@hotmail.com; ecruz@pmalaw.com; eduardo.pinera@toyota.com; Edwin.Acevedo@ddec.pr.gov; emelyies.torres@toyota.com; epenerypr@gmail.com; erica.cosme@gsonnell.com; Fberrios@peritoselectricistas.org; francisco.berrios@hotmail.com; franciscojrullan@yahoo.com; gerard.berlinski@toyota.com; gerardo_cosme@solartekpr.net; gperez@solrenew.com; hamely@motorambar.net; ialsina@plazalasamericas.com; idiaz@glenninternational.com; info@carlosmatta.com; israel.diaz@warren-ecm.com; jack@pantekpartners.com; jameauxl@aim.com; jan.rodriguez@toyota.com; javrua@sesapr.org; jbouza@caguasexpressway.com; jcardona@aggpr.com; jrnartinez@pmalaw.com; jorrodriguez@motorambar.net;

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Exhibit 1

Program Schedule and LUMA's Comments



Electric Vehicles Project Schedule

NEPR-MI-2021-0013

Table of Contents

1.0	Executive Summary	2
2.0	Introduction & Context.....	3
3.0	Procurement of Contractors	4
4.0	Data availability and data quality	5
4.1	Available Data	5
4.2	Data Collection	5
5.0	Implementation of EV Time of Use (TOU) tariff	6
5.1	Securing EV Charging Consumption Data (C-1 Project Schedule)	6
5.2	EV TOU tariff Implementation Support (C-2 Project Schedule)	6
5.3	Customer Outreach and EV TOU tariff Communications Plan (C-3 Project Schedule)	8
5.4	EV TOU tariff (C-4 Project Schedule)	8

1.0 Executive Summary

LUMA is hard at work accelerating a historic green energy transformation in Puerto Rico by ushering in a clean energy future that will include more solar, more wind and more electric vehicles (EVs).

To date, the more than 3,000 men and women of LUMA have made, in just 20 months, significant progress advancing clean energy priorities and improving the electric system. For example, LUMA has already helped connect over 42,000 customers to solar power, adding over 270 megawatts of renewable electricity to the grid; provided continued support to the Energy Bureau, together with renewable energy developers and investors, to execute the next steps of integrating up to 1,000 megawatts of new utility-scale solar energy and up to 500 megawatts of energy storage into the grid. Additionally, LUMA is coordinating with three utility-scale wind and solar energy facilities to connect an additional 175 megawatts of electricity to the grid. Overall, these are key examples of the multifaceted renewable energy projects that are advancing Puerto Rico's clean energy goals and will improve the future reliability of the electric system for customers.

As part of LUMA's clean energy vision, LUMA is deeply committed to empowering the growth of Electric Vehicles (EVs) and transforming Puerto Rico's transportation sector as part of its overall effort to advance a shared clean energy vision. Most importantly, by modernizing the island's transportation infrastructure, LUMA will achieve our shared clean energy and climate goals as set forth in Act 17-2019, known as "Puerto Rico's Energy Public Policy Act"¹ and Act 33-2019, known as "Climate Change Mitigation, Adaptation, and Resiliency Act".² LUMA's proposed portfolio of near-term actions in the Proposed Phase 1 EV Plan (Phase 1 EV Plan)³, as filed Puerto Rico's Energy Bureau, will not only help support, encourage, and empower the use of EVs, it will help contribute to Puerto Rico's clean energy objectives that will benefit our 1.5 million customers and their families for years and decades to come.

LUMA looks forward to the Energy Bureau's review and assessment and to working together to make real and tangible progress on the fundamental clean energy transformation and modernization of Puerto Rico's electric system.

¹ Act 17-2019 - <https://bvirtualogp.pr.gov/ogp/Bvirtual/leyesreferencia/PDF/2-ingles/17-2019.pdf>

² Act 33-2019 - <https://bvirtualogp.pr.gov/ogp/Bvirtual/leyesreferencia/PDF/2-ingles/0033-2019.pdf>

³ LUMA Energy's Phase 1 Electric Vehicles Plan [Motion Re-submitting Exhibit 1 Filed on September 1, 2022 with Technical Repairs and Requesting Substitution of Original Exhibit](#)

2.0 Introduction & Context

On January 13, 2023, the Energy Bureau issued a Resolution and Order (January 13, R&O)⁴ making a series of observations and conclusions and issuing various directives and setting deadlines relating to the filed Phase 1 EV Plan and the Revised Rate Design⁵. Among these, the Energy Bureau ordered LUMA to submit by February 10, 2023 (a date later extended to February 17, 2023)⁶, a Project Schedule for the implementation of the Interim EV TOU Rate, and that this Project Schedule:

[...] (i) detail[...] each task that LUMA has identified as being important to align with the rollout of the EV TOU Rate, (ii) articulate[...] precisely what other partners, programs, initiatives, etc. must be engaged to proceed with the Phase 1 EV Plan, and when it expects to engage with them, (iii) specif[y] how LUMA will conduct the RFP for data collection and billing integration methods and costs, and (iv) specif[y] a timeline for LUMA's cost-benefit analysis as it decides how to implement the requisite enhancements to its IT and billing systems.

The Phase 1 EV Plan, referenced in the January 13, R&O, presents a broader list of activities and comprises six-near term actions to be pursued over the next three years, that alongside the work of other stakeholders, promote the deployment of EV infrastructure across Puerto Rico. Approval of the Phase 1 EV Plan or its components will facilitate LUMA's ability to comprehensively plan the implementation of such activities and empower the clean energy and EV transformation in Puerto Rico.

LUMA reiterates its commitment to Puerto Rico's clean energy transformation in order to benefit LUMA's 1.5 million customers. It is important to keep in mind that reaching these goals requires other stakeholders to work alongside and in coordination with LUMA as well as to pursue other work streams for which LUMA is not responsible. Broadly speaking, electrification of transportation is not the responsibility of the electric utility, but it is a government policy with multiple private actors that have to undertake actions towards the massive change entailed. LUMA continues to work collaboratively with the regulator, government, private, and civil society stakeholders to develop sound policies and strategies while building a more reliable and resilient energy system.

LUMA would like to address some of the required actions and constraints that affect the upcoming activities and tasks as described in the Project Schedule.

⁴ See Energy Bureau's Resolution and Order of January 13, 2023.

⁵ LUMA Energy's Revised Rate Design - [Motion Submitting Revised EV Rate Design Proposal](#)

⁶ See Energy Bureau's Resolution and Order of February 14, 2023.

3.0 Procurement of Contractors

LUMA foresees the need to procure external contractors for several elements of the Phase 1 EV Plan as follows:

1. **Market Research:** Market research (Project Schedule task 4) the transportation electrification needs and potential outreach and public policy enhancements for Low Income and Disadvantaged customers.
2. **Consumption Analysis:** Collection and provision of EV charging consumption from vehicle telematics or usage data from residential EV chargers equipped with communications modules. This activity is discussed in more detail in Section 5.1 below.
3. **Billing Changes:** Modifications and enhancements to our billing system to enable billing customers under the EV TOU tariff and to integrate EV charging consumption data from the telematics vendor (#2 above). For these changes, LUMA will utilize our existing expert contractor for our billing and related systems. Further details on our approach to the EV TOU tariff Implementation are provided in Section 5.2 below.
4. **New Customer Rates:** Development and execution of the EV TOU tariff customer outreach and communications plan, as described in Section 5.3 below.

LUMA plans to utilize an expert already under contract, for item #3 above., LUMA anticipates procurements undertaken in compliance with LUMA's procurements rules and processes, which closely follow federal procurement guidelines. Given the complexity of federal procurement requirements and processes, the procurement process for activities typically takes longer than other procurements and are subject to delays based on federal approval processes. LUMA will proactively communicate updates to the schedule with the Energy Bureau.

4.0 Data availability and data quality

4.1 Available Data

LUMA has continuously engaged with external stakeholders from the start of the Phase 1 EV Plan development and its filing and aims to work collaboratively with stakeholders and entities to help facilitate the interconnection of EV infrastructure by streamlining processes and serving as an engaged participant in the process. Upon further engagement, stakeholders have provided their inputs on market barriers, areas of support and available funding. Additionally, LUMA has sought information from government agencies and there is consensus among LUMA and these stakeholders that there are limitations to data availability and quality, creating a challenge to accurately forecast EV growth in Puerto Rico. To proceed accurately, LUMA is working with these agencies to identify ways to collect and forecast information, with the State Energy Program (SEP) through the Department of Economic Development and Commerce (DDEC) commissioning a study to obtain accurate data for forecasting among many other efforts.

LUMA will continue to engage with these agencies that prioritize energy affordability and security. Their collaboration will continue to be a priority in order to enable transportation electrification in Puerto Rico.

4.2 Data Collection

The approach proposed for the EV TOU project is to utilize the existing billing and IT systems. This will allow the tariff to be implemented in the near term without significant required investment in a Meter Data Management System and Advance Metering Infrastructure (AMI) meters.

LUMA proposes moving forward with a rate that utilizes aggregated vehicle charging data from a third-party provider to be sent to LUMA. Once the data is aggregated and presented in the necessary file format, LUMA's system will receive the data through established secure transmission protocols and then a customer bill would receive the aggregated time of use consumption data and the bill would generate the detail for charges. For these changes, LUMA would utilize its existing contractor for billing and related systems to modify or enhance the system to update rate and billing details and integrate with third-party aggregator information. This contractor is an existing provider and has historical and detailed system experience which is important to be able to implement planned changes with a fast-paced timeline.

5.0 Implementation of EV Time of Use (TOU) tariff

There are four primary tasks associated with the implementation of the EV TOU tariff:

1. Securing EV Charging Consumption Data (Subsection C-1 of Project Schedule)
2. EV TOU tariff Implementation Support (Subsection C-2 of Project Schedule)
3. Customer Outreach / EV TOU tariff Communications Plan, (Subsection C-3 of Project Schedule)
4. EV TOU tariff approvals (Subsection C-4 of Project Schedule)

These tasks are described below.

5.1 Securing EV Charging Consumption Data (C-1 Project Schedule)

LUMA agrees with the Energy Bureau that vehicle telematics or usage data from residential EV chargers equipped with communications modules would be the most expedient way to secure EV charging consumption data for billing of participants in the EV TOU tariff on an interim basis.

This task covers the development and issuance of an RFP to secure an external vendor with expertise in this area, along with the evaluation of proposals received and contracting with the preferred vendor. Once the vendor is contracted, LUMA will also need to undertake internal system changes to securely receive the consumption data from the vehicle telematics and EV chargers.

Based on recent experience, LUMA expects this process to take 5-6 months from the issuance of an RFP before the vendor is on board, as shown in the Project Schedule. Trying to expedite this process could jeopardize the quality of the vendor selected and, ultimately, the quality of EV charging data and range and extent of EV models for which charging consumption data is available.

Upon securing a contract with the chosen vendor, LUMA will prepare a costing proposal for the Energy Bureau for recovery of the EV Charging Consumption Data costs. Further, once a vendor is on board, more concrete details will be secured regarding vendor requirements and customer enrollment processes for gathering customer telematics data. The time required for the vendor to develop and implement these processes before customer telematics data is available will be estimated by the vendor after on boarding and analyzing the existing system.

5.2 EV TOU tariff Implementation Support (C-2 Project Schedule)

The approach proposed for the EV TOU tariff Implementation project is to utilize the existing billing and IT systems to facilitate a near-term opportunity for the tariff to be implemented without significant investment in a Meter Data Management System and Advance Metering Infrastructure (AMI) meters as a pre-requisite.

LUMA proposes moving forward with a rate that utilizes aggregated vehicle charging data from a third-party provider to be sent to LUMA (as discussed in 5.1 above). Once the data is aggregated and

presented in the necessary file format, LUMA's system will receive the data through established secure transmission protocols and then a customer bill would receive the aggregated time of use consumption data and the bill would generate the detail for charges. These changes would utilize LUMA's existing expert contractor for billing and related systems to modify or enhance the system to update rate and billing details and integrate with third-party aggregator information. This contractor is an existing provider and has historical and detailed system experience that is important to be able to implement planned changes with a fast-paced timeline.

It is also important to note that:

1. This methodology of receiving billing determinants from a third-party is innovative even from a mainland utility system perspective. This innovation will be supported through a vendor (or, possibly, vendors) that will be selected specifically to provide this service and that have experience in conducting these programs. However, this approach is new and there are unknowns that may arise throughout the project.
2. Throughout 2023 and potentially into 2024 LUMA anticipates undertaking several modifications to its billing system for other items such as PREPA Bankruptcy Plan of Adjustment charges, Retail Wheeling, and Energy Efficiency rates. LUMA is also currently undergoing significant efforts under the System Remediation Plan to fix and address the existing billing system and related processes to resolve inherited situations. Additional resources can be added to address the changes required by the Energy Bureau, however, testing and validation of the many system changes required are a concern for LUMA because having so many initiatives underway at one time poses potential risk and likelihood of additional costs to address regression testing to avoid errors and issues in a compounded change management scenario.
3. These various new requirements represent significant changes to systems that LUMA is still remediating, and unforeseen complications are to be expected.

As noted, LUMA expects that the bulk of the tariff implementation support would be done with a combination of internal and external resources already under contract to its Customer Experience team.

As LUMA identifies and explores the many IT and billing system enhancements necessary to implement the EV TOU tariff, there may be alternative approaches available for certain enhancements. As appropriate, LUMA will evaluate these alternatives and choose the alternative that provides the best value (or benefit/cost ratio) to LUMA and its customers based on the evaluation criteria. If any of these evaluations are required, LUMA anticipates completing them as part of Task 19: Identify necessary procedures system changes to implement EV TOU tariff.

Interested customers would be able to register for the EV TOU tariff starting at the end of September. Billing of these participating customers would occur on their normal billing cycle immediately following completion of 1) the EV TOU tariff implementation support task, and 2) the various acquisition and customer enrollment processes to be undertaken by the third-party telematics data aggregator. LUMA also proposes that billing should not begin until a specific number of customers, to be determined for the Phase 1 EV Plan submission, have registered for the rate.

LUMA will prepare a costing proposal to the Energy Bureau for recovery of the EV TOU tariff implementation support activities and other related costs, as appropriate.

5.3 **Customer Outreach and EV TOU tariff Communications Plan (C-3 Project Schedule)**

LUMA intends to secure an external vendor to support customer outreach and communications related to the EV TOU tariff, as LUMA does not currently have the appropriate expertise or sufficient resources for this work. This task covers the development and issuance of an RFP to secure an external vendor with expertise in this area, along with the evaluation of proposals received and contracting with the preferred vendor. Once the vendor is contracted, LUMA will work with the vendor to develop and execute the customer outreach and EV TOU tariff communications plan.

LUMA considers customer outreach as an iterative effort and an essential element for the successful implementation of an EV TOU rate.

Based on recent experience, LUMA expects this process to take at least three months after the vendor is on board, as shown in the project schedule.

5.4 **EV TOU tariff (C-4 Project Schedule)**

This task is primarily focused on securing the necessary Energy Bureau approvals for the final EV TOU tariff sheet, derivation of the EV TOU tariff based on the current FCA and PPCA, and process for updating the EV TOU tariff as the FCA and PPCA are changed quarterly as described in the Draft Phase 1 EV Plan.

Task	Milestone	Status	FY23					FY24										
			Jan	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.		
A. Low Income and DA Customer Memorandum																		
1	Low income and DA customer outreach	In Progress																
2	Develop market interest research approach	In Progress																
3	Develop RFP for research provider	Not Started																
4	Issue RFP for research provider	Not Started																
5	RFP responses due	Not started																
6	Select preferred provider	Not Started																
7	Submit memorandum to PREB	Not Started																
8	Ongoing LI and RI customer engagement	Not Started																
B. Pursue Federal Funding																		
9	Federal funding and potential impact on EV penetration	In Progress																
10	Identify possible federal funding opportunities	In Progress																
11	Identify the potential impact of programs on EV and charging infrastructure penetration	In Progress																
C. Implementation of EV Tariff																		
12	Implementation of EV Tariff	In Progress																
C-1. EV Charging Consumption Data																		
13	Develop RFP for charging consumption data	In Progress																
14	Issue RFP	Not Started																
15	RFP responses due	Not started																
16	Submit estimated costs and capabilities to PREB as recoverable costs	Not Started																
17	Internal system changes to enable collection of charging consumption data	Not Started																
C-2. EV Tariff Implementation Support																		
18	Identify support needs for EV tariff implementation	In Progress																
19	Identify necessary procedures system changes to implement EV Tariff	Not Started																
20	EV Tariff implementation readiness confirm	Not Started																
21	Submit estimate of incremental cost for EV Tariff implementation to PREB	Not Started																
C-3. Customer Outreach / EV Tariff Communication Plan																		
22	Develop RFP for customer outreach vendor	Not Started																
23	Issue RFP	Not Started																
24	Develop preliminary plan	Not Started																
25	Customer outreach	Not Started																
C-4. EV Tariff																		
26	Develop draft EV tariff sheet and any associated bill changes	In Progress																
27	PREB review of EV tariff sheet and any associated bill changes	Not Started																
28	EV Tariff registration open	Not Started																
29	EV Tariff bills issued	Not Started																
D. Final Phase I EV Plan																		
30	Update Final Phase I EV Plan	In Progress																
31	Submit Final Phase I EV Plan	Not Started																

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Filings before the PREB and/or the issuance of a milestone.