

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

**IN RE: ELECTRIC VEHICLE
CHARGING INFRASTRUCTURE
DEPLOYMENT**

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Motion to Submit Billing Integration Report
And Request to Modify Reporting Frequency**

NEPR

Received:

Mar 13, 2023

10:17 PM

**MOTION TO SUBMIT BILLING INTEGRATION REPORT AND REQUEST TO
MODIFY REPORTING FREQUENCY**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES now **LUMA Energy ServCo, LLC** (“LUMA”), through the undersigned legal counsel, and respectfully states and submits 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 Resolution and Order”) ¹ making various determinations regarding the Draft Phase I Electric Vehicle Plan “Phase I EV Plan”) filed by LUMA on September 1, 2022² and the Revised Draft Electric Vehicle Rate Design Proposal (“Interim EV TOU Rate”) filed by LUMA on July 21, 2022³.

¹ On that same date, the Energy Bureau also issued a *Resolution Nunc Pro Tunc* correcting *motu proprio* a clerical error in the January 13th Resolution and Order. The discussion of the January 13th Resolution and Order in this motion considers these corrections.

² 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 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.

³ See LUMA’s *Motion Submitting Revised EV Rate Design Proposal* of that date and its Exhibit 1.

2. In the January 13th Resolution and Order, this Energy Bureau issues various orders regarding the deadlines for filing the Phase I EV Plan and the development and launch of the Interim EV TOU Rate, respectively, and certain tasks associated to these actions, including, among others: (i) the submittal of a Project Schedule by February 10, 2023 (“Project Schedule”) (*see id.* at pages 11 and 14); (ii) the submittal of a report every thirty (30) days on the progress with the data collection and billing to integrate the Interim EV TOU Rate (“Billing Integration Reports”) (*see id.* at page 11); and (iii) the issuance of a Request for Proposals (“RFP”) for vendors and partners to provide services regarding the implementation of the Interim EV TOU Rate “to the extent necessary to implement the Interim EV TOU Rate in full” (“Rate Implementation Support RFP”) (*see id.*).

3. On February 9, 2022, LUMA submitted a motion (“February 9th Motion”) requesting this honorable Energy Bureau an extension to submit the Project Schedule (*see* February 9th Motion at pages 3-4); informed that the billing integration efforts had not commenced and there were no concrete steps to be reported at the time (*see id.* at pages 4-5); and informed that the Rate Implementation Support RFP was determined by LUMA to be unnecessary to implement the Interim EV TOU Rate in full and therefore will not be issued (*see id.* at page 5). *See 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”).

4. 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 (*see* February 14th Resolution and Order, page 2); (ii) ordered LUMA to present the Billing Integration 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 Rate Implementation Support RFP” (*see id.*).

5. On February 17, 2023, LUMA filed the Project Schedule, in compliance with the January 13th Order and the extension granted in the February 14th Resolution and Order.

6. On March 1, 2023, LUMA filed the explanation requested by the Energy Bureau regarding the Rate Implementation Support RFP, in compliance with the February 14th Resolution and Order.

II. Submittal of Billing Integration Report And Request to Change Reporting Frequency

7. In compliance with the January 13th Resolution and Order, as modified by the February 14th Resolution and Order, LUMA submits herein the Billing Integration Report. *See Exhibit 1.* The Billing Integration Report includes information on progress on activities related to data collection and billing to integrate the Interim EV TOU Rate. *See id.*

8. LUMA also respectfully requests the Energy Bureau to consider reducing the frequency for submitting the Billing Integration Reports from monthly to quarterly so that it is more closely aligned or consistent with other progress reports LUMA is required to provide in this and other dockets and provide for more efficient reporting. Specifically, in this docket, the only other recurring progress reporting requirement at this time is to file semi-annual reports regarding performance information and other information related to the Phase I EV Plan implementation listed in the January 13th Resolution and Order (*see* January 13th Resolution and Order, page 6) which is less frequent than quarterly. In other dockets, the following examples are worth noting: In Case No. NEPR-MI-2022-0001, *In Re: Energy Efficiency and Demand Response Transition Period Plan*, the most frequent recurring progress reporting requirement is quarterly and the report

is due within approximately sixty (60) days after the end of the quarter (*see* Resolution and Order of January 13, 2023 issued in that case, page 18); in Case No. NEPR-MI-2020-0019, *In Re: System Remediation Plan*, the most frequent recurring progress reporting requirement is quarterly (*see* Resolution and Order of August 25, 2021 issued in that case, page 3) and the due date is forty-five (45) days after the end of the quarter (*see* Resolution and Order of November 4, 2021 issued in that case, page 2); in Case No. NEPR-MI-2021-0004, *In Re: Review of LUMA's Initial Budgets*, the most frequent recurring progress reporting requirement is quarterly (*see* Resolution and Order of May 31, 2021 issued in that case, page 36) and the same post-quarter forty-five (45) day filing deadline as in case NEPR-MI2020-0019 was adopted; and in Case No. NEPR-MI-2021-0002, *In Re: Review of Puerto Rico Electric Power Authority's 10 Year Infrastructure Plan*, the most frequent recurring progress reporting requirement is quarterly (*see* Resolution and Order of June 16, 2021 issued in case No. NEPR-MI-2021-0004, page 6 (wherein federal funding activity reporting was established on a quarterly basis to avoid “duplicity of reporting” with Case No. NEPR-MI-2021-002)) and the same post-quarter forty-five (45) day filing deadline as in the two afore-cited cases was adopted.

9. LUMA respectfully submits that alignment and consistency of the reporting in this case with the quarterly cadence for the other dockets is preferable than separate and more frequent reporting. Comprehensive quarterly reporting creates efficiencies in the time and efforts of the LUMA teams to prepare the reports. In addition, quarterly reporting allows for the use of better-quality information and a more complete picture of processes, including providing direct links between activities. In contrast, monthly reporting may not reflect a fuller picture of progress achieved in the process of data collection and billing to integrate the Interim EV TOU Rate.

10. In addition, given the multiple tasks that LUMA needs to focus on to prepare and implement the Phase I EV Plan and to launch and implement the Interim EV TOU Rate- initiatives that are ground-breaking in Puerto Rico and the United States- and the limited overall utility of monthly reporting, LUMA respectfully submits that the thirty (30)-day reporting frequency is overly burdensome and takes time away from other, more critical tasks.

11. As part of this request, LUMA proposes to submit the quarterly reports within the first forty-five (45) days of the end of each quarter, as is done in other dockets.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; accept **Exhibit 1** in compliance with the Billing Integration Report reporting requirement for March 13, 2023 under the January 13th Resolution and Order, as modified by the February 14th Resolution and Order; and **grant** LUMA's request to change the frequency of the Billing Integration Reports from monthly to quarterly as described in this Motion.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 13th day of March 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 and to the Independent Office of Consumer Protection by submittal to Hannia Rivera, hriviera@jrsp.pr.gov. 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.rodriquez@outlook.com; antonio@velocicharge.com; apietrantoni@pmalaw.com; azayas@azeng.net; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com; carlosxcedeno@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; epenenergypr@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;

jack@pantekpartners.com; jameauxl@aim.com; jan.rodriguez@toyota.com; javrua@sesapr.org;
 jbouza@caguasexpressway.com; jcardona@aggpr.com; jmartinez@pmalaw.com;
 jorrodriguez@motorambar.net; jortiz@caguasexpressway.com; jose.maeso@crowley.com;
 jpibernus@motorambar.com; JSantana@motorambar.com; jtosado@motorambar.net;
 juan.diaz.galarza@guidehouse.com; jvazquez905@gmail.com;
 kenan.d.davila@sargentlundy.com; kkoch@tesla.com; l.marcano@aconer.org;
 lsundeen@tesla.com; luisgmoreno@gmail.com; Marangelly.Cruz@toyota.com;
 marilyn.maldonado@toyota.com; mlandron@plazaad.com; mpietranтони@pmalaw.com;
 nannette.berrios@solpetroleum.com; nmontes@ccmpr.com; nrodriguez@senado.pr.gov;
 Ochavez@Padigm.com; odette@grupofernandezpr.com; omundo@plazalasamericas.com;
 patlopez00@gmail.com; dany.oliva@toyota.com; pjcleanenergy@gmail.com;
 rdiaz@glenninternational.com; repagan@burnsmcd.com; rry@tcm.law;
 Ruben.Gonzalez@pumaenergy.com; rvega@guidehouse.com; salvadorlopez5@hotmail.com;
 shehaly.rosado@ddec.pr.gov; Veronica@pantekpartners.com; Victor.Aponte@toyota.com;
 victor.martinez@totalenergies.pr; wilfredsonllc@gmail.com; zlopez@efonalledas.com;
 mara.cruz@toyota.com; lizette.cotto@toyota.com.



DLA Piper (Puerto Rico) LLC

500 Calle de la Tanca, Suite 401

San Juan, PR 00901-1969

Tel. 787-945-9107

Fax 939-697-6147

/s/ Laura T. Rozas

Laura T. Rozas

RUA Núm. 10,398

laura.rozas@us.dlapiper.com

Exhibit 1

Billing Integration Report



LUMA's Billing Integration Report:
Data Collection and Billing to Integrate the
Interim EV Time of Use (TOU) Rate

NEPR-MI-2021-0013

March 13, 2023

Introduction

The more than 3,000 men and women of LUMA are making infrastructure improvements every day and building the next-generation electric grid that Puerto Ricans deserve. The progress to date includes:

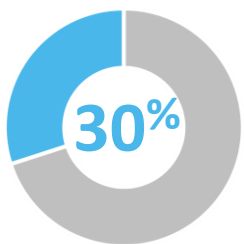
- Advancing **282** FEMA projects representing over **\$6.7 billion** in federally funded projects, with **35** already under construction, to repair, restore and rebuild the electric grid.
- Launching a historic Substation Modernization Initiative (SMI), a **\$55 million** FEMA-funded effort to reconstruct five critical substations.
- Repairing and replacing **26,000+** streetlights as part of our FEMA-funded **\$1 billion** Community Streetlight Initiative (CSI) to improve safety and energy efficiency across communities.
- Increasing the adoption of renewables in Puerto Rico by helping to connect **42,000+** customers to clean solar power.

Looking ahead, LUMA will continue to build on the progress we've made and remain steadfast in our commitment to building a more reliable, more resilient, more customer-focused and cleaner energy system for all of Puerto Rico.



LUMA's Historic Progress

ENHANCED RELIABILITY



**FEWER
OUTAGES**
under LUMA,
measured by
SAIFI

EXPANDED RENEWABLES

Helped Connect
42,000+
CUSTOMERS
to rooftop solar, representing
approximately 270 MW



IMPROVED SAFETY

Achieved
65%
OSHA Recordable Injury
Rate Improvement
No Serious Injuries



INCREASED RESILIENCY

Replaced
4,400+
**BROKEN AND FAILING
UTILITY POLES**

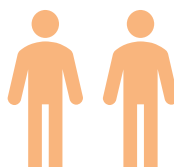


Installed
300+ **DISTRIBUTION &
AUTOMATION**
devices

BETTER CUSTOMER SERVICE

Assisted
2,000,000+
PEOPLE

after reopening
all 25 customer
service centers



Answered
4,200,000+
CALLS

with an average
call wait time of
<5 minutes



ACCELERATED FEDERAL PROJECTS

Launched
\$1,000,000,000+
**COMMUNITY STREETLIGHT
INITIATIVE**

in historic
first FEMA
approval



Advanced
282
PROJECTS
representing **\$6.7B**
of dollars in investments



Billing Integration Report

Interim Electric Vehicle Time of Use Rate



Key Activity Summary

- Developed initial technical requirements for system data integration
- Evaluated internal tariff requirements for specific scenarios (i.e. Net Energy Metering)
- Reviewed specifications and technical requirements with existing contractor for existing Oracle Customer Care & Billing (CC&B) System
- Received from existing contractor for CC&B qualifications as background and global experience with EV and EV Time of Use (TOU) system support and integration
- Conducted initial vendor conversations to understand market and structure to inform RFP development



Data Collection

The various data collection items being addressed through the vendor integrations are related to the items below

Customer
enrollment - 3rd
party system

Customer
validation between
3rd party and
LUMA

Rate engine
development in
CC&B

Receive and batch
process of 3rd
party data

Monitoring and
verification



Key Milestones

Key Milestones	Status
Complete evaluation of vendor capabilities and cost requirements to determine certainty of Request for Proposal (RFP) requirement	In progress
As necessary, finalize RFP scope document and publish	In development
Finalize technical requirements for system integration	In development
Complete vendor selection and onboarding; either RFP or other process	Not started
Build and test Oracle CC&B batch process to receive EV Time of Use (TOU) billing determinants data	Not started
Launch production processes and monitor steps	Not started