

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

NEPR Received: Jun 23, 2023 4:15 PM
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IN RE: REVIEW OF LUMA’S INITIAL
BUDGETS

CASE NO. NEPR-MI-2021-0004

**SUBJECT: Informative Motion Submitting LUMA’s
comments to Genera PR’s Proposed Maintenance
and Outage Schedule**

**INFORMATIVE MOTION SUBMITTING LUMA’S COMMENTS TO GENERA PR’S
PROPOSED MAINTENANCE AND OUTAGE SCHEDULE**

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 states and submits the following:

1. On June 9, 2023, the honorable Puerto Rico Energy Bureau (the “Energy Bureau”) held a Virtual Technical Conference (“June 9th Technical Conference”) in connection with its review of the proposed System Annual Budgets submitted by LUMA on May 16, 2023.¹

2. During the June 9th Technical Conference, the Energy Bureau directed Genera PR, LLC (“Genera PR”) to provide to the Energy Bureau, among others, a maintenance and outage schedule based on certain conditions outlined by the Energy Bureau during the June 9th Technical Conference, and to coordinate with LUMA, in its capacity as system operator, such proposed maintenance and outage schedule.

¹ The proposed System Annual Budgets are comprised of the proposed budget for the Transmission and Distribution System (“Proposed Annual T&D Budgets”), developed by LUMA; the budget proposal for the legacy thermal generation units (the “GenCo Budget”), developed by Genera PR, and the budget proposals for the hydroelectric generating units and the public irrigation facilities (the “HydroCo Budget”) and PREPA and its subsidiaries other than GenCo and HydroCo (the, “HoldCo Budget”), developed by PREPA.

3. On June 13, 2023, Genera PR provided LUMA with a proposed maintenance and outage schedule.

4. In compliance with the Energy Bureau's directives during the June 9th Technical Conference, and after a thorough review of Genera PR's proposed maintenance and outage schedule, on June 21, 2023, LUMA provided Genera PR with its comments and feedback. LUMA hereby submits a copy of such response to the honorable Energy Bureau. *See Exhibit 1* to this Motion.

WHEREFORE, LUMA respectfully requests that the honorable Bureau **take notice** of the aforementioned and **deem** LUMA to be in compliance with the directives issued by the Energy Bureau during the June 9th Technical Conference.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of June, 2023.

I hereby certify that this motion was filed using the electronic filing system of this Energy Bureau. I also certify that copy of this motion will be notified to the Puerto Rico Electric Power Authority, through attorneys of record: **Joannely Marrero Cruz** jmarrero@diazvaz.law and **Maraliz Vázquez**, mvazquez@diazvaz.law; and to Genera PR LLC, through counsels of record, **Jorge Fernandez-Reboredo**, jfr@sbgblaw.com and **Alejandro López Rodríguez**, alopez@sbgblaw.com.



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Exhibit 1

LUMA's June 21 Letter to Genera

June 21, 2023

To: Genera

Attention: Katuska Bolaños
Chief Regulatory Officer
954 Ponce de Leon Ave, Suite 400
San Juan, PR 00907

Re: LUMA Response to Genera Letter regarding Proposed Maintenance and Outage Schedule in compliance with PREB June 9, 2023 Bench Order

LUMA understands that in compliance to a bench order from the Puerto Rico Energy Bureau dated June 9, 2023, Genera requested in its June 13, 2023 letter that LUMA's review and approve Genera's maintenance plan. In response to this request, LUMA provides the following feedback:

1. Working with the assumptions that 350 MW of FEMA temporary power will be available and that Aguirre 1 will be fully available and online by July 2023, then the FY2024 plan provided by Genera on June 13, 2023 would comply with the System Operation Principles ("SOP") for reserve margin, and can be executed as proposed. There has not been an exact date provided by PREPA for when Aguirre 1 will come back online, and it is expected to be limited to 100 MW when it comes back due to missing condenser circulating pumps.
2. Generally, it is not ideal to take units out during the peak demand season (July to September) given the higher load and the risk of unexpected outages from other units. However, under the current plan assumptions, there is sufficient capacity to enable Genera's proposed Costa Sur 5 outage beginning in August 2023. However, reconsideration of the Costa Sur 5 outage may be required if any issues or delays arise with availability of Aguirre 1, San Juan 9, and/or the 350 MW of FEMA temporary units.
3. To mitigate risk of generation supply shortfalls, LUMA recommends adjusting the timing of the San Juan 5 planned outage to November or December 2023 until at least one of Costa Sur 6 or Palo Seco 4 is online.
4. There is no information in Genera's plan about planned outages for the Aguirre Combined Cycles and the Cambalache units. LUMA requests Genera provide an update with this information.
5. LUMA also highlights that the FEMA temporary generation units are scheduled to run until the end of December 31, 2023. It is LUMA's understanding that an extension for running the temporary units beyond that date is not unconfirmed. LUMA strongly supports such an extension in order to lower the risk of insufficient generation to serve customer demand.
6. Please note that LUMA has not provided Genera with feedback on the information provided for AES and EcoEléctrica. As System Operator, LUMA is required to directly obtain this



information from AES and EcoEléctrica, and coordinate and schedule maintenance work with them directly.

Should Genera have any further questions, please do not hesitate to reach out. LUMA looks forward to working with Genera and coordinating in accordance with the System Operation Principles and other related processes. It is important to note that any maintenance schedule is subject to change depending on system status, unforeseen outages, and other conditions. LUMA will continue to communicate directly with Genera on these matters through the Control Center and Genera's designated operations contacts.

Sincerely,

Gary F. Soto-Fernández

Gary F. Soto-Fernández (Jun 21, 2023 13:43 EDT)

Gary F. Soto Fernández

Director, Energy Management and TOC

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