

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

NEPR

Received:

Aug 9, 2023

7:07 PM

IN RE:

Review of the Puerto Rico Electric Power
Authority Integrated Resource Plan

CASE NO. NEPR-AP-2023-0004

**SUBJECT: Motion Submitting Presentation Offered
During Initial Technical Conference of August 8, 2023.**

**MOTION SUBMITTING PRESENTATION OFFERED DURING INITIAL
TECHNICAL CONFERENCE OF AUGUST 8, 2023**

TO THE PUERTO RICO ENERGY BUREAU:

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

1. On July 12, 2023, the Energy Bureau issued a Resolution and Order in this docket, whereby it initiated the instant administrative proceeding for the review of the proposed 2024 Integrated Resource Plan (the “2024 IRP”) to be filed by LUMA as the agent for the Puerto Rico Electric Power Authority pursuant to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated June 22, 2020 (the “July 12th Resolution and Order”).

2. In what is pertinent, through the July 12th Resolution and Order, the Energy Bureau took notice of Exhibit 1 to LUMA’s confidential *Motion Submitting Update on IRP Technical Consultant Contracting Process, Request for Modification of Procedural Timeline and Request for Confidential Treatment* filed on March 31, 2023 in Case No. NEPR-MI-2020-0012, *In re: Implementation of the Puerto Rico Electric Power Authority Integrated Resource Plan and*

Modified Action Plan (the “March 31st Motion”), through which LUMA informed the Energy Bureau of certain delays impacting the contracting of the IRP Technical Consultant. The Energy Bureau also granted LUMA’s request as included in the March 31st Motion, that the Energy Bureau schedule the initial technical conference regarding the review of the 2024 IRP to no earlier than May 2023 to provide sufficient time for LUMA to be able to complete the IRP Technical Consultant contracting process in anticipation of the technical conference.

3. Accordingly, the Energy Bureau scheduled the initial technical conference in this administrative proceeding for August 8, 2023, pursuant to the *Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority*, Regulation No. 9021 dated April 20, 2018 (the “August 8th Technical Conference”).

4. The Energy Bureau issued, as Attachment A to the July 12th Order, an Agenda for the August 8th Technical Conference (Attachment A), whereby it identified three main topics of discussion, to wit: (i) Introduction and IRP Prefiling Issues – to be covered by the Energy Bureau; (ii) LUMA IRP Plan to Meet PREB Expectations under Regulation 9021 and Address Puerto Rico Public Policy Compliance – to be covered by LUMA; and (iii) Questions and Discussion.

5. The Energy Bureau also required LUMA to prepare a “presentation of its plan for the 2024 IRP, including addressing the agenda items in Attachment A and indicating how LUMA is or will follow the specific action items ordered by the Energy Bureau in the August 20, 2020 IRP Order.” *See*, July 12th Order at page 4 and Attachment A at paragraph 2.

6. After other procedural developments, on August 3, 2023, LUMA filed an *Informative Motion and Submission of Proposed Revised Agenda for Technical Conference Scheduled for August 8, 2023* whereby it proposed certain modifications to the Agenda issued by the Energy Bureau through the July 12th Order.

7. On August 8, 2023, LUMA appeared at the August 8th Technical Conference and, in compliance with the July 12th Order, offered a presentation to the Energy Bureau covering the items included in the technical conference's Agenda.

8. During the technical conference, the Energy Bureau directed LUMA to file the presentation as part of this proceeding's administrative docket. In compliance therewith, attached herein as *Exhibit 1* LUMA submits a copy in PDF format of the presentation offered during the August 8th Technical Conference with slides 2-3, 5-6 and 8-9 provided in both Spanish and English.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **deem** LUMA in compliance with its bench order to file the presentation offered during the August 8th Technical Conference in the public record of the instant proceeding.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on August 9, 2023.

I HEREBY CERTIFY that we filed this notice and request using the electronic filing system of this Puerto Rico Energy Bureau and that courtesy copy of this notice and request was notified to counsel for PREPA mvazquez@diazvaz.law and jmarrero@diazvaz.law; and to Genera PR LLC through brannen@genera-services.com; kbolanos@genera-pr.com; regulatory@genera-pr.com.



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Exhibit 1
Presentation Offered During Initial Technical Conference of August 8, 2023



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Commencement of Review Proceeding and Initial Technical Conference for the 2024 IRP - Prefiling Process (Phase 1)

August 8, 2023



Agenda

- Introducción de LUMA
- Punto 2 en la agenda del NEPR
 - a. Cumplimiento del plan de acción de la orden del PIR 2020
 - b. Asuntos Medulares para el IRP de 2024
 - c. Mejoras en los procesos internos
- Preguntas y discusión

Agenda

- LUMA Introduction
- Item 2 on Energy Bureau Agenda
 - a. Compliance with 2020 IRP Order Action Items
 - b. Core Substantive Issues for 2024 IRP
 - c. Internal Process Improvements
- Questions and Discussion

LUMA Introduction



Perspectiva

- Este es el comienzo de un proceso importante para Puerto Rico. Estamos recopilando opiniones de una variedad de partes interesadas sobre cómo Puerto Rico puede avanzar mejor hacia un futuro energético más sostenible.
- LUMA se ve a sí misma como el administrador del proceso con la responsabilidad de trabajar junto con todas las partes interesadas para encontrar el mejor camino a seguir para Puerto Rico, construyendo el sistema eléctrico más confiable, resiliente y limpio que el pueblo de Puerto Rico merece.
- Estamos al comienzo de un proceso integral de varias fases del PIR dedicado a garantizar que toda retroalimentación y sugerencias se tomen en cuenta al desarrollar el PIR.

LUMA's Perspective

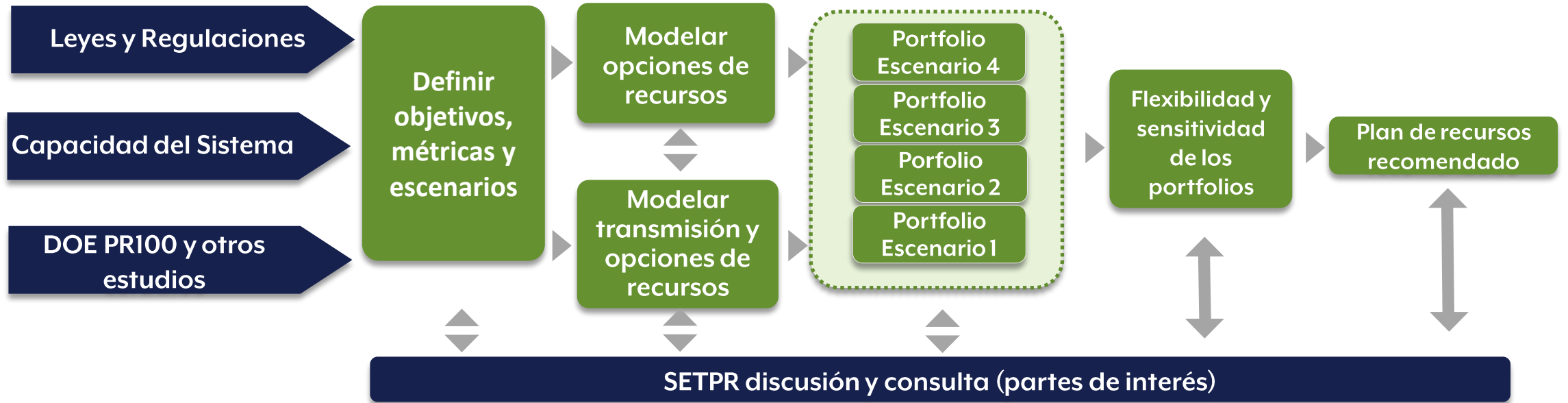
- This is the beginning of an important process for Puerto Rico. We are gathering views from a variety of stakeholders on how Puerto Rico can best move forward toward a more sustainable energy future.
- LUMA views itself as the steward of the process with the responsibility to work together with all stakeholders to find the best path forward for Puerto Rico, building a more reliable, resilient and cleaner energy system that the people of Puerto Rico deserve.
- We are at the beginning of a multi-phase, comprehensive process of the IRP dedicated to ensuring all feedback and input is considered while developing the IRP.



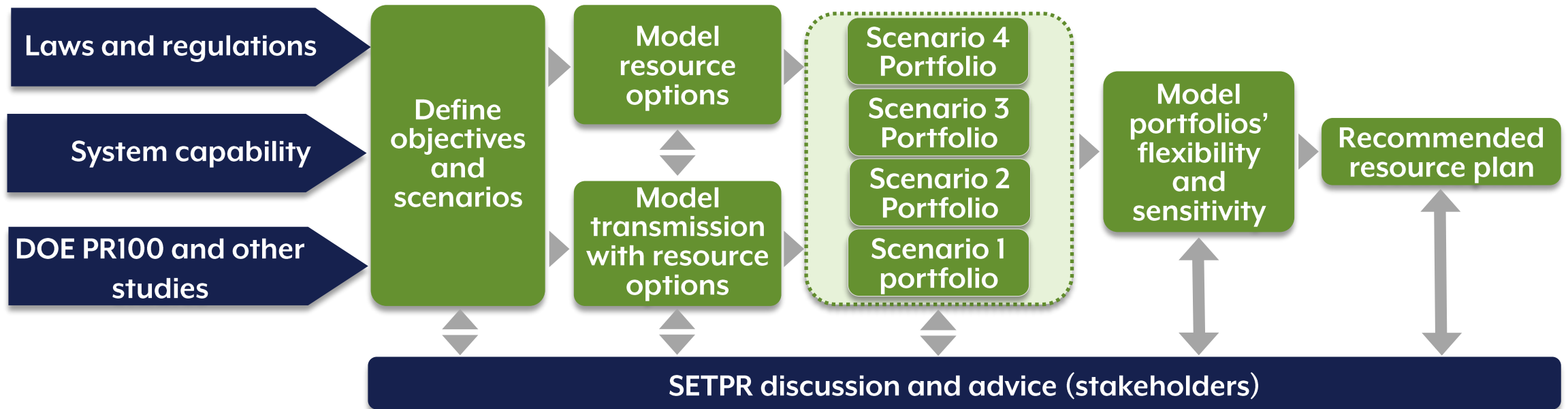
Objectives

- Respond to Energy Bureau July 12th R&O.
- High-level overview of planned IRP methodology and status.

PIR 2024 Resumen de Metodología



2024 IRP Methodology Summary



2.a Compliance 2020 IRP Order Action Items



i. Energy Efficiency and Demand Response

- Based on information from the Energy Bureau consultant, LUMA does not expect their market baseline and potential studies to be completed in time to incorporate the results in the 2024 IRP.
- Benchmarking of other energy efficiency and demand response program costs and performance will be conducted.
- Will conduct cost-effectiveness testing of programs.
- LUMA is currently conducting a DR resource projection that includes interruptible load tariffs.

ii. Distributed Generation and Storage

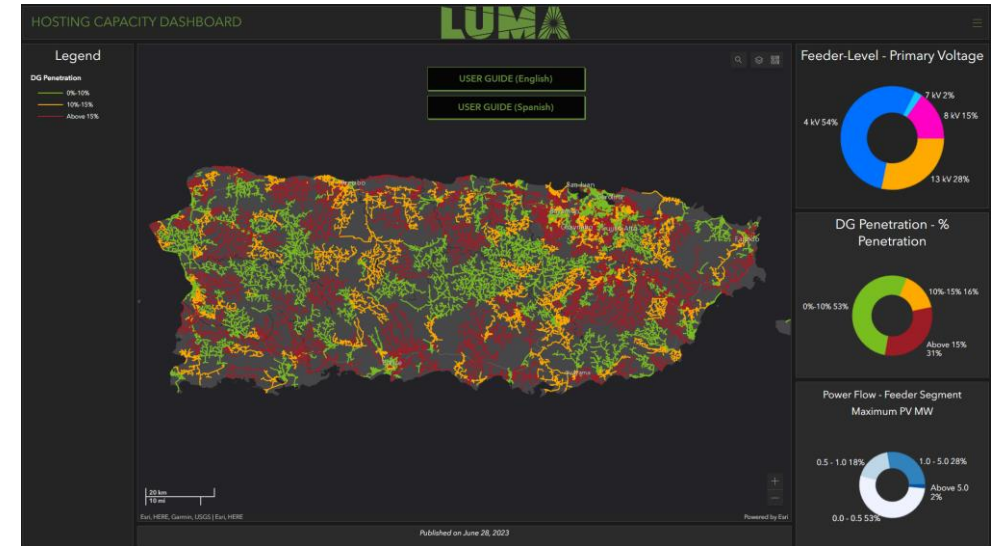
- LUMA has proposed a battery emergency demand response program and plans to assess the value of distributed storage as a demand resource in the 2024 IRP.
- LUMA will discuss with the IRP Technical Consultant options to forecast distributed generation and storage adoption rates.
- LUMA is working on acquiring distributed storage services to provide grid services.



ii. Distributed Generation and Storage (Continued)

Other LUMA Actions to Support Distributed Generation and Storage

- Centralization of the NEM Program
 - Significant reduction in application time and activation.
 - 59K+ applications activated / 350 MW since LUMA's commencement.
 - Total of 85K+ NEM Customers and 580 MW.
- Published Hosting Capacity Map (HCM)(NEPR-MI-2019-0011 R&O)
 - Voltage layer
 - DER level penetration
 - Incremental Hosting Capacity
- Technical Interconnection Requirements (TIR) for DERs proposed to the Energy Bureau (12/22).
- Adoption of DER storage as a Virtual Power Plant solution
 - Technical support to 17 MW VPP Tranche 1



iii. Load Forecasting – Base & Alternative Load Forecast

- LUMA is progressing on a multi-step process to improve both the peak load and energy forecasts for the 2024 IRP and future forecasts.
- LUMA created a new forecast for the 2024 IRP that included quality checks and cleansing of historical load data and regression analysis of alternative econometric drivers.
- Final results confirmed GNP and population are statistically relevant drivers for the forecast of the residential, commercial, and industrial loads.
- LUMA used Moody's Analytics projections of 4th and 96th percentile of GNP, population projections, and extreme temperatures to provide alternative load forecasts for use.



iii. Load Forecasting – EV Forecast

- LUMA plans to review and use the final EV forecasts developed by DOE PR100 Study.

iii. Load Forecasting – Energy Efficiency

- While the order requires accounting for federal appliance standards, building codes, and relevant governmental programs in the development of its load forecast and Energy Efficiency projections, this will require completion of the Energy Bureau's market baseline and potential studies.

iv. Wind Resources*

- LUMA has filed analysis of onshore and offshore wind generation potential in Puerto Rico, completed by NREL. Results are being incorporated in DOE PR100 Study and the 2024 IRP.
- NREL has also analyzed the Solar generation potential as part of the DOE PR100 Study. Preliminary results were presented during the PR100 Advisory Group meetings.
- LUMA completed a complementary analysis using 10 years of sub-hourly historical wind and solar data to assess the regional differences in energy potential and the seasonal and sub-hourly variability that can be expected.
- After review and input by the IRP Technical Consultant, this collective set of data and analysis will serve as input to the 2024 IRP.

*Requires support of IRP Technical Consultant



v. Resource Need Assessment*

- Capacity resource balance for fiscal year 2023 (i.e., July 2022- June 2023), can be found in the Generation Resource Adequacy Analysis Report filed with the Energy Bureau on August 30, 2022.
- Resource Adequacy Analysis Report for this year is in process and is expected by the end of August 2023.
- Resource needs assessment will be expanded to 20 years (i.e., 2025 to 2044) in 2024 IRP.

vi. Caveats and Limitations - Scorecard Use if Chosen*

- LUMA plans to include a comprehensive set of objectives and scenarios in the 2024 IRP, with input from stakeholders.
- No decision has yet been made on how best to combine results of the individual indicators into comprehensive assessment tool, such as a scorecard.
- LUMA plans to discuss options for scorecard weights and other options with our IRP Technical Consultant before choosing a final methodology.

vii. Transmission and Distribution

Transmission

1. Area Transfer Study completed to identify transfer capability across planning areas to provide baseline guidance to the 2024 IRP.
2. Optimal placement study completed to identify favorable sites for renewable generation using ratio of the resource hosting MW to the network upgrade and interconnection costs. Study was to aid developers in identifying favorable locations and assist in selection of new generation locations in 2024 IRP.
3. Reliability Studies/ Infrastructure planning: Transmission level studies are performed to evaluate resource planning impact on system reliability. Methodology follows best utility practice commonly observed by North-American Electric Reliability Corporation (NERC).
 - Transmission expansion plan (TEP), system condition for year 2026 was considered and included TEP projects and earlier IRPs. Power flow model used includes results of all ongoing integrated distribution system planning and hosting capacity analysis
 - Transmission solutions are proposed for network upgrades to resolve the observed system reliability violations
4. Further transmission studies planned for the 2024 IRP to assess essential reliability services of resource portfolio options, e.g., ramping capability, inertia, short circuit strength.



vii. Transmission and Distribution

Distribution

1. Hosting Capacity

- Focused on assessing hosting capacity of field feeders validated and undergoing upgrade work
- Using calculation of stochastic hosting capacity before and after upgrades
- Efforts to increase Hosting Capacity
 - Feeder Rebuild and Area Planning (Conductor upgrades, voltage conversions)
 - TIR and associated smart inverter requirements

2. DER forecast

- Monitoring evolving DER trends in Puerto Rico
- Plan discussions with distributed solar and storage installers to gather input
- Evaluating forecasting options for the IRP (i.e., distributed PV, Storage, EE, DR and EV)

viii. Modified Action Plan Contract cessation/retirement of AES by end of 2027 *

- As suggested by the Energy Bureau, in paragraph 919 of the 8/24/2020 IRP R&O, LUMA will consider the potential of repowering the AES unit to natural gas as part of the 2024 IRP.

Core Substantive Issues for 2024 IRP



i. Scenario analysis structure

- LUMA intends to define both the future scenarios and the sensitivity runs under which portfolios are assessed to ensure the preferred portfolio is selected after rigorous analysis under future potential conditions.
- Plan to gather input of both stakeholders and our IRP Technical Consultant before finalizing number and individual characteristics of scenarios and sensitivity runs.
- Defined a preliminary methodology to assess flexibility of portfolios under range of future conditions, will also consider testing portfolio flexibility by supplementing or replacing planned deterministic analysis with probabilistic modeling of future conditions.



ii. Annual energy and peak load forecasting

Treatment of input assumptions for energy efficiency and distributed resources.

- Plan to review optional paths to energy efficiency forecast, including using data from the DOE PR100 Study. As discussed in slide 8, the distributed resources forecast will be developed after consultation with the IRP Technical Consultant.

iii. Tranche 1 (T1), T2, T3, T4-T6 Planned Resources

- LUMA plans to use most recent data and projections available from Energy Bureau for the renewable and storage procurement Tranches.

vi. Wind and Solar potential from DOE PR100 Study

- Plan to have the IRP Technical Consultant review wind and solar potential work completed by NREL and include as basis for renewable projections in the 2024 IRP.

v. Sources for wind, solar, battery, and other resource cost projections*

- Plans to consider cost projections developed for the DOE PR100 Study as one, and possibly the primary, source of resource cost projections for the 2024 IRP.
- Plan to leverage expertise of IRP Technical Consultant to assist in assessing reasonableness of Projections for use in 2024 IRP or the need to adjust projections or supplement with alternative estimates developed by IRP Technical Consultant.

vi. Hydro resources

- LUMA will request information to PREPA-HydroCo of any plans to refurbish the current hydro fleet or any plans to add new hydro resources in the future.

vii. Distribution system analysis/ distributed resources projection*

- Issues were addressed in slides 9 and 18.

viii. Transmission system analysis including lessons learned and analysis from the DOE PR100 Study

LUMA Studies

- Continue to evaluate and study Utility Scale Renewables
 - Tranches (1, 2 & 3)
 - Identified POI and Network upgrades
- Established Transmission Expansion Process including annual Transmission Planning Study:
 - 83 transmission projects to improve transmission system Reliability and Resilience.
 - 47 projects - 38 kV
 - 20 projects - 115 kV
 - 16 projects - 230 kV
- Conducted Physical Security Critical Infrastructure Protection (CIP) Study and commenced projects to protect critical substations.
 - Six (6) critical substations identified from steady state studies
 - Additional critical substations could be added from Dynamic Studies
- Applied relevant standards and developing roadmap to adopt NERC standards.
- MTR – modeling of Grid Forming inverters and requiring for new BESS (Tranche 2 onwards).



viii. Transmission system analysis including lessons learned and analysis from DOE PR100 Study (Continued)

DOE PR100 Study

- EGRASS Damage prediction tool being integrated into PR100 initiative.
 - Utilizing scenario planning tool in conjunction with the PR100 EGRASS
 - Inclement weather scenario planning includes a general model for asset vulnerability and impact on load drops during major weather events.
- Grid-forming inverter models to study multi-scenarios of RPS intermediate goals. Studies include other grid reinforcements such as synchronous condensers.

ix. New peakers & new black start resource procurements

- In November 2022 PREPA requested approval of RFP by the Energy Bureau.
- The Energy Bureau conditionally approved the RFP on January 23, 2023.
- PREPA filed a status report with the Energy Bureau on August 1, 2023, in Case No. NEPR-MI-2022-005; however, the filing is largely confidential.
- LUMA is reviewing the current black start plan and if improvements could be made to the current plan.

x. Retirement schedule for legacy generation assets*

- Demonstrated in its Resource Adequacy filing (filed 8/30/22) that PR generation fleet is significantly below capacity needed to meet industry standard of 1 day in 10 years loss of load expectation (LOLE).
- Resource adequacy should determine the retirement dates for generation assets.

xi. Role of 2023-installed emergency generation at Palo Seco and San Juan

- Palo Seco (150 MW)
 - Units operational and online as baseline units.
 - FEMA states that the six installed generators (gensets) will continuously operate at 150MW and not be subject to reducing production.
- San Juan (200 MW)
 - Ten gensets in process of installation: electrical and mechanical systems under construction, such as diesel pipelines, cable tray installation, and approximately 220' of natural gas pipeline from the New Fortress Energy Interconnection point to the gensets.
 - Target date for complete installation adjusted for mid-September due to time required for design and build of the new 115 kV transmission line.

Internal Process Improvements



i. Processes for Improving the Filing

- LUMA filed status filing of the process on 12/17/2021.
- Lessons learned and potential improvements:
 - LUMA suggests the IRP Technical Consultant procurement process could be further enhanced by the removal of additional steps requiring Energy Bureau review and approval.
 - Regulation 9021 requirements for the Appendix 1 Transmission and Distribution Plan portion of the IRP is an extensive element of the IRP filing that could be either simplified or have a substantial portion of the required contents moved to a separate filing and review process without diminishing the IRP. Information from the T&D Plan would still be used in the IRP.



Questions and Discussion





Thank You