

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

NEPR

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IN RE:
TARIFA PERMANENTE DE LA
AUTORIDAD DE ENERGÍA ELÉCTRICA
DE PUERTO RICO

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Motion Reiterating Request to Modify
the Cadence of the Report on Streetlight Repairs.**

**MOTION REITERATING REQUEST TO MODIFY THE CADENCE OF THE
REPORT ON STREETLIGHT REPAIRS**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), through the undersigned legal counsel and respectfully submit the following:

1. On June 28, 2020, this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order (“June 28th Resolution and Order”) making, among others, determinations regarding the factors for the annual adjustment riders for the July 2020 to June 2021 period.

2. In pertinent part, in the June 28th Resolution and Order, the Energy Bureau approved the reconciliation amount and annual factor for the annual SUBA-HH rider for the mentioned fiscal year period. *See* June 28th Resolution and Order, Section IV, paragraph 2. The Energy Bureau explained that the SUBA-HH rider is designed to recover costs associated with various subsidies, including municipal streetlighting. *See id.* The Energy Bureau also ordered the Puerto Rico Electric Power Authority (now LUMA) to submit, “no later than the tenth (10th) day of the following month, a detailed report regarding the public light emitting diode (LED) or renewable luminaires installed (i.e., new or in replacement of traditional luminaires) during the previous month so that the Energy Bureau can verify compliance with Act 17-2009 and can

compile the necessary information for the next reconciliation and calculation of the factor of the SUBA-HH rider”. *See id.*, Section VIII, paragraph 3 (footnote omitted) (translation ours).

3. Since it commenced operating the T&D system, LUMA has been filing the monthly reports on streetlight repairs in compliance with the mentioned requirement of the June 28th Resolution and Order.

4. On April 10, 2023, LUMA filed a motion styled *Motion Submitting Report on Streetlight Repairs for March 2023 and Request for Modification of Reporting Frequency* whereby it submitted the monthly report on streetlight repairs for the month of March 2023. As part of its motion, LUMA also included a request for the Energy Bureau to reduce the frequency for submitting the streetlight repairs report from monthly to quarterly so that it is more closely aligned with the frequency for reconciliation and calculation of the factor for the SUBA-HH rider and other progress reports that LUMA is required to provide in other dockets, as well as to provide for more efficient reporting.

5. As espoused in the April 10th Motion, since the SUBA-HH factor is a factor calculated and reconciled annually, the current monthly streetlight reporting requirement is more frequent than the rider it supports. LUMA further explained that the quarterly reporting can effectively support the compilation of the necessary information for the yearly reconciliation and calculation of the SUBA-HH Rider as well as any necessary verification of compliance with Act 17-2019.

6. Quarterly streetlight reports would also align the reporting in this case with the quarterly cadence for other dockets.¹ It would also allow LUMA to inform the PREB and the

¹ LUMA noted that in other dockets, quarterly reporting is more prevalent. As examples, LUMA cited the reporting requirements in Cases No. NEPR-MI-2022-0001, *In Re: Energy Efficiency and Demand Response Transition Period Plan*; NEPR-MI-2020-0019, *In Re: System Remediation Plan*; NEPR-MI-2021-0004, *In Re: Review of LUMA's Initial*

public with better quality of information than that provided by the monthly reporting. Monthly reporting may not reflect the full picture of the progress achieved in the process of data collection.

7. In light of the above and for the reasons espoused in its April 10th motion which are incorporated herein by reference, LUMA respectfully reiterates its request for the Energy Bureau to reduce the frequency for submitting the instant report from monthly to quarterly.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **modify and reduce** the cadence of the streetlighting report from monthly to quarterly.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of August 2023.

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 attorney for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.com and to the Independent Office of Consumer Protection by submittal to Hannia Rivera, hrivera@oipc.pr.com.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147
Fax 939-697-6147

/s/ Ana Margarita Rodríguez Rivera
Ana Margarita Rodríguez Rivera
TSPR Núm. 16,195
ana.rodriguezrivera@us.dlapiper.com

/s/ Valeria Belvis Aquino
Valeria Belvis Aquino
RUA NUM. 22,584 valeria.belvis@us.dlapiper.com