

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

NEPR
Received:
Aug 29, 2023
10:23 PM

IN RE:
ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD
PLAN

CASE NO.: NEPR-MI-2022-0001
SUBJECT: Motion to File FY 2023 Q4
TPP Report

MOTION TO SUBMIT FY 2023 Q4 TPP REPORT

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 state and request the following:

I. Procedural History

1. On February 16, 2023, this Energy Bureau issued a Resolution and Order (the “February 16th Resolution and Order”) in which it considered, amended and approved the proposed Energy Efficiency (“EE”) and Demand Response (“DR”) Transition Period Plan submitted by LUMA on June 21, 2022 (“Proposed TPP”)¹, containing the EE and DR Programs to be implemented by LUMA during the Transition Period and associated budgets for Fiscal Years (“FY”) 2023 and 2024, among others.

2. In the February 16th Resolution and Order, the Energy Bureau concluded that the Proposed TPP “represents a reasonable and appropriate launch of EE and DR programs in Puerto Rico and approves all components of LUMA's Proposed TPP that are not specifically addressed”

¹ See *Motion Submitting Proposed EE/DR Transition Period Plan* and its *Exhibit 1* filed on June 21, 2022 in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation, and Monitoring*.

in the February 16th Resolution and Order (the Proposed TPP, as approved by the Energy Bureau, hereinafter the “TPP”). *See* February 16th Resolution and Order on page 5. In addition, the Energy Bureau established requirements related to various TPP program-related tasks and associated deadlines (*see id.* at pages 20-21 and Table 2), as well as reporting requirements and deadlines (*see id.* at page 18 and Table 1).

3. With respect to reporting, the Energy Bureau ordered LUMA to deliver quarterly and annual reports on a fiscal year schedule; align report filing dates for FY2023 and FY2024; produce annual reports within 120 days following the end of the program year as required by the EE Regulation; and adopt the updated reporting schedule in Table 1 of the February 16th Resolution and Order, titled “Transition Period Report and Filing Schedule” (“Table 1”). *See id.* at page 18. Among the deadlines established in Table 1 is the deadline of August 29, 2023 to file the FY2023 fourth quarter (“Q4”) Report (“FY2023 Q4 TPP Report”). *See id.* According to the provisions of Table 1, the reporting period for the FY2023 Q4 TPP Report is from the TPP launch until June 30, 2023 and “[a]ny actions completed from TPP launch through June 30, 2023 shall be included in the FY2023 Q4 [TPP Report]”. *See id.* With respect to the required report data, the Energy Bureau ordered LUMA to “[r]eview and provide input on the Energy Bureau’s data reporting templates for its quarterly and annual reports; [...] and until such time as the reporting templates are available, report on all metrics identified in Section 6 of the Proposed TPP”. *See id.* at page 19.

4. On March 8, 2023, LUMA filed a motion requesting reconsideration of certain provisions of the February 16th Resolution and Order which did not include the reporting deadlines in Table 1 of the February 16th Resolution and Order. *See Motion for Reconsideration of Resolution and Order of February 16, 2023, and Request to Vacate Deadlines* of that date.

5. On April 3, 2023, the Energy Bureau issued a Resolution and Order (“April 3rd Resolution and Order”) vacating certain portions of the February 16th Resolution and Order and establishing revised deadlines for certain program funding, launching and reporting activities. The April 3rd Resolution and Order did not modify the reporting schedule in Table 1 of the February 16th Resolution and Order.

6. After other procedural events, on June 15, 2023, the Energy Bureau issued a Resolution and Order (“June 15th Order”) clarifying certain questions relating to the implementation of the TPP’s Emergency DR Program raised by LUMA in a motion filed on June 5, 2023.² The Energy Bureau also revised the deadlines for certain Emergency DR Program milestones, which did not affect the reporting requirements in Table 1 of the February 16th Resolution and Order.

7. On August 11, 2023, the Energy Bureau issued a Resolution and Order (“August 11th Order”) addressing certain issues relating to funding availability for the TPP’s Emergency DR program and the expected program schedule.³ In addition, the Energy Bureau revised some of the TPP program-related tasks and deadlines which did not affect the reporting requirements in Table 1 of the February 16th Resolution and Order.

² This was the *Informative Motion and Urgent Request for Clarification Regarding Requirements Applicable to the Emergency DR Program and Extension to Meet Program Enrollment Deadline in Resolution and Order of April 3, 2023* filed by LUMA on June 5, 2023, in which LUMA sought clarification regarding the applicability of certain provisions of Regulation 8701, Amendment to Regulation No. 8618 on Certification, Annual Fees and Operational Plans for Electric Service Companies in Puerto Rico, as amended and of the Regulation for Demand Response, Regulation 9246, with respect to the TPP’s Emergency DR Program and the DR aggregators under that program.

³ The August 11th Resolution and Order addressed issues raised on these subjects in a *Response to Orders Staying Approval and Implementation of EE Rider and Request for Suspension of Deadlines to Submit Proof of Customer Enrollment and Documentation on Capability to Call Events Related to Emergency DR Program* filed by LUMA on July 14, 2023; a *SESA reiterated Request for PREB Funding Authorization for LUMA to move forward with EE/DR programs and Further Requests for Clarity of Emergency DR Programs Details* filed by the Solar and Energy Storage Association of Puerto Rico on July 20, 2023; and *Comments Proposing Launch Milestones for the Battery Emergency DR Program Under LUMA EE/DR Transition Period Plan* filed by DR Third Party Aggregator on August 1, 2023.

II. Submittal of FY2023 Q4 TPP Report

8. In compliance with the February 16th Resolution and Order, LUMA herein submits its FY2023 Q4 TPP Report containing a description of the actions completed by LUMA from TPP launch through June 30, 2023 and reporting on the progress as set forth in Section 6 of the TPP. *See Exhibit 1.* The quarterly reports are intended to serve as status updates throughout the year.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the FY2023 Q4 TPP Report in compliance with the requirements set forth in the February 16th Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of August 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 copy of this Motion to agraitfe@agraitlawpr.com; info@sesapr.org; elevin@veic.org; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; the attorneys for PREPA at jmarrero@diazvaz.law and mvazquez@diazvaz.law; and the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov.



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

FY2023 Q4 TPP Report



LUMAPR.COM

Transition Period Plan Quarterly Report

Reporting Period - Oct 2022 through June 2023

NEPR-MI-2022-0001
August 29, 2023

Content

- Introduction
- Progress
- Status
- Customer Education
- Education and Outreach
- DR resources acquired
- Program Savings
- Program Costs
- Conclusions and recommendations
- Appendix

Introduction

LUMA Energy is pleased to submit its first Transition Period Plan Quarterly Report in accordance with the *Regulation for Energy Efficiency* as adopted pursuant to the provisions of Act 57-2014 as amended, known as the *Puerto Rico Energy Transformation and RELIEF Act* ("Act 57-2014") and Act 38-2017, as amended, known as the *Uniform Administrative Procedure Act of the Government of Puerto Rico*.

LUMA is committed to working with the Puerto Rico Energy Bureau (PREB or Energy Bureau) and building a more reliable, and resilient energy system for the people of Puerto Rico. LUMA is responsible for helping to implement Puerto Rico's public energy policy, including critical customer initiatives such as Energy Efficiency (EE) and Demand Response (DR) Programs, that are required by law and mandated by the Energy Bureau.

The information included in this report covers the period between October 1st, 2022 through June 30, 2023. LUMA has prepared this report in accordance with the guidelines suggested in the Transition Period Plan submitted on June 21, 2022, and approved by the Energy Bureau on February 16, 2023.

Progress

LUMA's accomplishments during this period include:

- **June 2022** - LUMA filed the Energy Efficiency and Demand Response Transition Period Plan approved by the Energy Bureau.
- **December 2022** - LUMA launched a Backup Generator Emergency Demand Response Pilot. (Additional information provided in slide 21).
- **June 2023** - LUMA made improvements to the energy section of the LUMA customer webpage to include information on energy efficiency and demand response.
<https://lumapr.com/residencial/ahorrando-energia-y-dinero/>
- **June 2023**- LUMA published an energy savings calculator with payback period projections
<https://lumapr.com/residencial/ahorrando-energia-y-dinero/>
See in resource tab
<https://lumapr.com/wp-content/uploads/2023/06/Energy-Savings-Calculators.xlsx>
- **August 2023** - After gathering input and information from aggregators, LUMA finalized the design and development of the first Battery Emergency Demand Response pilot in Puerto Rico.

Status

TPP Program	Initiatives	Description	Status
Program Management and Implementation Strategies Sec. 5.0	Implementation Contractor Onboarding	Evaluation of proposals	Completed August 2023
Education and Outreach Program Sec. 4.2	Consumer Education	Improvements to LUMA's webpage	Completed June 2023
Education and Outreach Program Sec. 4.2	Consumer Education	Publication of energy savings calculator	Completed June 2023
Education and Outreach Program Sec. 4.2	Consumer Education	Energy savings tips on bill	In progress
Education and Outreach Program Sec. 4.2	LUMA STEM Program	Integrate students of all ages in projects and discussions to help them learn from and contribute to innovative uses of AGI technologies	Completed April 2023
Education and Outreach Program Sec. 4.2	Stakeholder Outreach	Active participation in bi-weekly meetings	In progress
Education and Outreach Program Sec. 4.2	Key Groups Interaction and support	Provided technical support to enterprise applying for DOE funding	Completed March 2023
Funding Sources and Cost Recovery Sec. 8.0	Grant Funds Identification	Conversations with the State Office of Public Energy Policy, Fortaleza, DOE and others	In progress
Street Light Conversion Program Sec. 4.5	Street Lighting Conversion Program	Repair or replace the streetlight infrastructure and upgrade to LED's	In progress
Emergency Demand Response Program Sec. 4.4.2	Pilot Program	Emergency Demand Response Pilot Program using backup generators	Launched December 2022
Battery Emergency Demand Response Program Sec. 4.3.2	Pilot Program	Use customer batteries to mitigate generation shortfalls (in process)	In progress

Customer Education

LUMA is actively educating customers about energy efficiency through different channels.

- Educational messages on monthly bills and bill inserts
- Available information on <https://lumapr.com/residential/energy-saving-tips/>
- As of August 23rd, 2023, **835,416** registered customers at Mi LUMA, and **486,298** customers are using the Mi LUMA mobile app.

Customer facing programs like incentive rebates, and DR programs are still being prepared to launch.

Education and Outreach

- LUMA has started customer education and outreach efforts, prior to launch of program pilots.

Education and Outreach	Quantity
Events	Approximately 15 Events
Social Media Posts	49 Social Media Posts
Website traffic	Approximately 15,651 website views

DR Resources Acquired

- The Battery Emergency Demand Response program will be launched in late fall 2023.
- After launch, the BEDRP aggregators could enroll up to **6,500 participants**.
- The BEDRP will be an important tool to help increase the energy available to all customers during emergency conditions and reduce the need for load shedding.

Program Savings

- LUMA has continued to pursue stakeholder and outreach efforts, prior to launching the pilot programs.
- Demand Response and Energy Efficiency savings and program indicators will be reported once individual programs launch.
- LUMA will report on the following:
 - Program Energy Savings by Sector
 - Program Energy Savings by Program
 - Demand Response Program
 - Additional information on Education and Outreach Initiatives

Estimated Program Costs

- Costs reported of the Energy Efficiency and Demand Response programs are related to professional services and LUMA out-of-pocket administrative costs incurred between October 2022 and June 2023.
- Costs incurred between June 2021 and September 2022 are not included in this table.
- Predictability and stability of funding is critical to success of all programs.
- LUMA representatives have been meeting regularly with the State Office of Public Energy Policy, Governor’s office and the US Department of Energy (DOE) to obtain program funding (which would reduce impact on customers rates).

Program	Estimated Costs
Residential Program	
Residential Rebates	\$0
C&I Program	
Business Rebates	\$0
Emergency DR	\$99,582
Economic DR	\$0
Education & Outreach	\$45,782
Cross-Cutting Planning, Administration & Startup costs	\$694,264

Conclusions and Recommendations

- LUMA will continue to:
 - educate customers about the benefits of energy savings,
 - engage with key stakeholders and
 - prepare for launch of the programs outlined in the EE/DR Transition Period Plan.
(Additional stakeholder details on slides 19 and 20.)
- LUMA plans to onboard an Implementation Contractor for a kick-off meeting and develop the final Energy Efficiency Program implementation details.
- After Energy Bureau approval of the Demand Response Program costs associated with compensation offered to EDR Aggregators, qualified aggregators will be identified, and aggregation agreements be executed so EDR Aggregators can proceed with customer enrollment.
- As indicated in the Transition Period Plan, the specific details of services will be finalized based on input from the Implementation Contractor selected to deliver the programs. The Implementation Contractor selected will be an expert in these programs and may offer innovative ideas or other considerations that will change the final program design details.

Appendix

Next Steps

Program	Activity	Description
EE/DR	Design and implementation of transition programs	Selection of an Implementation Contractor expected in September 2023
EE	Consumer Education	Continuation of energy saving tips on energy bill, bill inserts, social media
EE	Street Lighting Conversion Program	Ongoing
EE	Identification of funds	Ongoing
EE/DR	Interaction and support with key groups	Ongoing
DR	Battery Emergency Demand Response Program	Sign agreement with aggregators expected in October 2023

Improvements Made to LUMA's web page: Energy Saving Tips

- **Content Improvements**
 - More information
 - Tips to help consumers save energy
- **Scope improvements - new links to:**
 - Public Energy Policy Program
 - ENERGY STAR
 - Small Business (tips specifically targeted to help small businesses save energy)

Consejos para ahorrar energía en el hogar

Conservar energía puede ayudarte a ahorrar dinero y salvar el planeta.

New webpage

Sigue los consejos que se ofrecen a continuación bajo cada categoría para que tú y tu familia tomen buenas decisiones sobre el consumo eléctrico en el hogar. A continuación, compartimos algunos ejemplos sobre maneras simples en las que puedes conservar energía y reducir el pago de tu factura de luz mensualmente.

- **Luces**
- **Enfriamiento**
- **Electrodomésticos**
- **Calentador de agua**
- **Equipos electrónicos**
- **Recursos**

Hay recursos e incentivos disponibles para ayudarte a reducir el consumo de energía y ahorrar en tu factura de luz.

- **Energy Saver:** El Departamento de Energía de EE. UU. dispone de recursos e información para ayudarte a ahorrar dinero relacionados con costos de energía.
- **Programa de Política Pública Energética:** Los residentes y negocios en Puerto Rico pueden optar por incentivos que tienen el propósito de fomentar la eficiencia energética y la energía renovable.
- **ENERGY STAR:** ENERGY STAR es un programa federal creado para ayudarte a ahorrar dinero y proteger nuestro medio ambiente. Los electrodomésticos certificados por ENERGY STAR consumen de un 10 a un 50 % menos de energía, lo que te ayudará a ti y a tu familia a reducir el consumo y el costo de la energía.
- **Small Businesses:** Puedes ahorrar hasta un 30 % en la factura de luz de tu negocio si tomas las medidas y estrategias adecuadas.

Calcula tu ahorro energético

Los electrodomésticos cada año son más eficientes, y los más viejos consumen más energía que los modelos más nuevos. Si estás buscando comprar un electrodoméstico nuevo, utiliza nuestra calculadora de eficiencia energética para estimar cuánto puedes ahorrar con un electrodoméstico certificado por ENERGY STAR.

[DESCARGA NUESTRA CALCULADORA DE EFICIENCIA ENERGÉTICA](#)

<https://lumapr.com/residencial/ahorrando-energia-y-dinero/>

Energy Savings Calculator

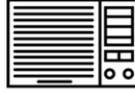
- LUMA’s downloadable calculator helps consumers estimate how much it will cost to operate their current equipment.
- LUMA’s downloadable calculator helps consumers see how much they can save by upgrading to ENERGY STAR appliances.
- LUMA’s downloadable calculator includes the following equipment options:
 - Refrigerator / Freezers
 - Lighting
 - Water Heater
 - Window Air Conditioner (AC)
 - Mini-Split AC



Example


[LEARN MORE AT energystar.gov](https://www.energystar.gov)

Estime cuanto le cuesta operar su aire acondicionado (AC) actual y cuanto puede ahorrar si lo mejora a uno ENERGY STAR



AC de ventana

PASO 1	¿Cuál es la capacidad de enfriamiento del AC que quiere reemplazar?	6,000 to 7,999 Btu/h
PASO 2	Costo de la unidad convencional (\$)	
	Costo de la unidad ENERGY STAR (\$)	

R E S U L T A D O S	Consumo anual de electricidad estimado de su AC actual (kWh/año)	2,021
	Consumo anual de electricidad estimado de su unidad ENERGY STAR nueva (kWh/año)	1,620
	Costo anual de electricidad estimado para operar su AC actual (\$/año)	\$667
	Costo anual de electricidad estimado para operar su unidad ENERGY STAR nueva (\$/año)	\$535
	Ahorro anual estimado (\$/año)	\$132

Periodo de repago estimado	Por favor entre costos en el Paso 2
-----------------------------------	--

Productos calificados ENERGY STAR son comparados a productos no calificados. Basado en 2,800 horas de uso anual. Los ahorros pueden variar según uso y otros factores. Los ahorros pueden variar según uso y otros factores. El periodo de repago es el tiempo que tomaría recobrar la inversión adicional de comprar un producto calificado ENERGY STAR. En esta calculadora, el periodo de repago es el tiempo que tomaría recobrar la inversión adicional de comprar un producto calificado ENERGY STAR (ver formula abajo). Ejemplo: el periodo de repago estimado para recobrar la inversión adicional de comprar un acondicionador de aire ENERGY STAR sería 1 semana. Suposiciones: estimados basados en acondicionadores de aire convencionales y ENERGY STAR con especificaciones similares comprados a precio regular (capacidad de enfriamiento: 8,000 Btu/h); otras suposiciones a las usadas en este ejemplo pudieran dar resultados diferentes.

$$\text{Tiempo estimado de repago (año)} = \frac{\text{Costo de la unidad ENERGY STAR (\$)} - \text{Costo de la unidad Convencional (\$)}}{\text{Ahorros estimados (\$) Tiempo (año)}}$$

Para información de productos ENERGY STAR visite <https://www.energystar.gov>
 Para consejos de como ahorrar energía visite <https://lumapr.com/residencial/ahorrando-energia-y-dinero/>
 Icono creado por Mania del Noun Project

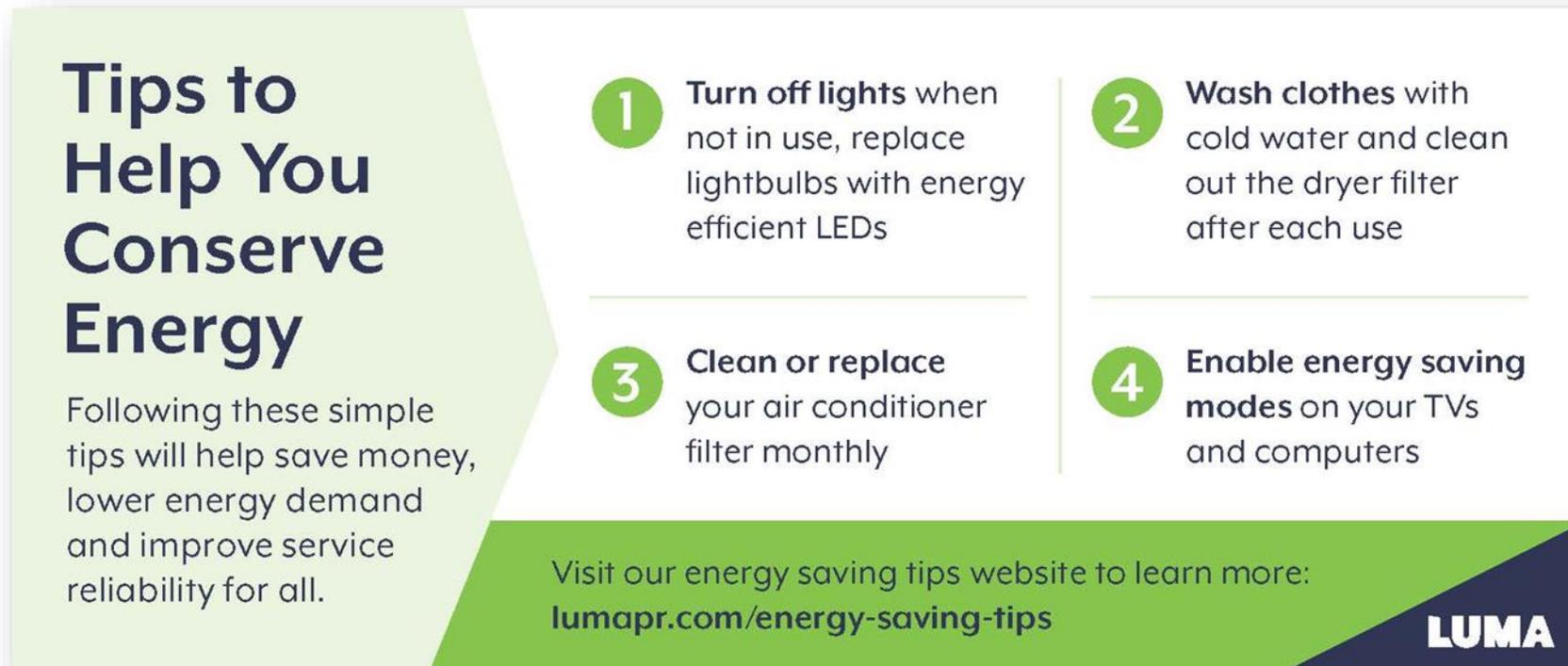
LUMAPR.COM

15

NEPR-MI-2022-0001
August 29,2023

Energy Savings Tips on Bill

Example of a LUMA Energy bill insert



The graphic is a rectangular insert with a light green background on the left and a white background on the right, separated by a diagonal line. The left side features the title 'Tips to Help You Conserve Energy' in a large, bold, dark blue font. Below the title is a paragraph of text. The right side contains four numbered tips, each with a green circular icon containing the number. The tips are arranged in two columns. At the bottom of the graphic, there is a green banner with white text and the LUMA logo in the bottom right corner.

Tips to Help You Conserve Energy

Following these simple tips will help save money, lower energy demand and improve service reliability for all.

- 1 Turn off lights** when not in use, replace lightbulbs with energy efficient LEDs
- 2 Wash clothes** with cold water and clean out the dryer filter after each use
- 3 Clean or replace** your air conditioner filter monthly
- 4 Enable energy saving modes** on your TVs and computers

Visit our energy saving tips website to learn more:
lumapr.com/energy-saving-tips

LUMA

Energy Savings Tips on Bill

Example of educational information directly placed on the LUMA energy bill.

¡En LUMA trabajamos para ti!

LUMA tiene tarifas de electricidad especiales para quienes cumplan con los requisitos, como los clientes de 65 años o más. Para más información, llámanos al 1-844-888-5862 o usa la aplicación Mi LUMA para llenar una 'Solicitud de plan de pago'.



Transformación del sistema eléctrico

¿Sabías que LUMA está encabezando la lucha por un Puerto Rico más renovable? En 17 meses, LUMA ha conectado a sobre 36,500 clientes de energía solar, más que los que conectó el operador anterior en 10 años.



LUMA Cantidad total adeudada al 7 de marzo de 2023:  PÁGINA 3 DE 4

La instalación de un equipo para generar energía de fuentes renovables puede ayudarle a reducir su factura de electricidad y LUMA, mediante sus oficinas comerciales o por Internet, le suministrará información sobre cómo puede cualificar para ingresar al programa de medición neta. Además, existen beneficios contributivos para incentivar la compra de esos equipos sobre los que puede obtener más información en el Programa de Política Pública Energética.



Energy Savings from LUMA's Community Streetlight Initiative

- Every streetlight LUMA installs utilizes next-generation LED lights that use approximately 65% less energy and can last four times longer than conventional streetlight bulbs.
- This is an important energy efficiency effort that has short and long-term benefits for Puerto Rico.

Energy Savings, calendar year 2022 Q4 – 2023 Q2

Period	Assessments	Repaired	Energy Savings
Calendar Year-Quarter	Quantity	Quantity	MWh
2022-Q4	33,959	10,176	1,220
2023-Q1	87,182	13,312	1,150
2023-Q2	93,471	12,936	516
Totals	214,612	36,424	2,886

Support to Key Strategic Groups

LUMA continues to support the initiative of key groups in the energy sector, such as:

- Virtual Power Plant Proponents (VPPs)
- Interest groups like the PR EE Working Group
- LUMA is preparing a Request for Proposal for the development and implementation of an AMI System in Vieques and Culebra.
- LUMA has issued a Request for Information (RFI) related to AMI to gather information on available technologies and costs for implementation in Puerto Rico.
- LUMA maintains regular engagement with local government agencies like the Department of Economic Development and Commerce (DEDC) Energy Policy Program (EPP) to collaborate in the creation and delivery of educational materials and joint outreach efforts.

Backup Generator Emergency Demand Response Pilot

- In December 2022, workshops were held with industrial customers from the following sectors:
 - Pharmaceutical – Medical Devices
 - Biotechnology
 - Agricultural Sciences
- In May 2023, a presentation of the pilot program was sent to 26 potential industrial participants.
- Based on feedback from participants, challenges to broad enrollment include:
 - Questions and concerns about the hours available under existing air permits.
 - Noise pollution.
 - Very limited number of hours to run per year.
- Other potential issues may include:
 - Additional specific costs to modify the generators for permits and compliance.