

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

NEPR Received: Aug 31, 2023 2:06 PM
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IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Motion Requesting Extension of Time to
Comply with Resolution and Order of August 16, 2023

**MOTION REQUESTING EXTENSION OF TIME TO COMPLY WITH
RESOLUTION AND ORDER OF AUGUST 16, 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. The requirement to submit quarterly reports on specified system data of the Puerto Rico Electric Power Authority (“PREPA”) arises under a Resolution and Order issued by the Puerto Rico Energy Bureau (“Energy Bureau”) on May 14, 2019, in this proceeding.

2. Pursuant to a Resolution and Order issued on December 30, 2020, the quarterly system data is due on the 20th day of the month after each quarter closes. Pursuant to Section 5.6 of the Puerto Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”), LUMA, as an agent of PREPA, submits systems data regarding the Transmission and Distribution System (“T&D System”) and as instructed by the Energy Bureau, submit PREPA’s system data regarding generation.

3. On April 20, 2023, LUMA filed before the Energy Bureau its *Submission of Performance Metrics Report for January through March 2023 and In Compliance with Orders of*

January 12, 2023 and April 3, 2023 ("April 20 Motion"). LUMA submitted its Report on System Data covering data from January through March 2023. Further, LUMA requested leave from the Energy Bureau to report reliability metrics (SAIDI and SAIFI metrics) using LUMA's districts and not the T&D System's previous operator's districts for the July 2023 quarterly performance metrics report filing.

4. Then, on July 20, 2023, LUMA filed its *Submission of Performance Metrics Report for April through June 2023* ("July 20 Motion"). LUMA submitted its Report on System Data covering April through June 2023. As announced in the April 20 Motion, in its submission of data pertaining to the reliability metrics, LUMA incorporated LUMA's districts instead of PREPA's districts.

5. On August 16, 2023, the Energy Bureau entered a Resolution and Order in which it determined that additional information was required to evaluate LUMA's request to report the reliability metrics (SAIDI and SAIFI metrics) according to LUMA's operational districts instead of using PREPA's districts ("August 16 Order"). Therefore, the Energy Bureau instructed LUMA to respond to various requests for information in Attachment A of the August 16 Order within fifteen (15) days.

6. LUMA is currently working on obtaining the necessary information to respond to the requests for information in Attachment A of the August 16 Order. However, LUMA will require additional time to provide the information related to the metrics within the LUMA district level to respond to the requests for information.

7. This extension request is in good faith and is not intended to cause unnecessary delay. LUMA remains committed to complying with the orders issued by the Energy Bureau.

WHEREFORE, LUMA respectfully requests that the Energy Bureau extend the deadline to respond to the requests for information contained in Attachment A of the August 16 Order until at least September 6, 2023.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st 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 counsel for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law, and the Independent Consumer Protection Office, Hannia Rivera Díaz, hrivera@jrsp.pr.gov.



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