

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

NEPR Received: Nov 14, 2023 10:58 PM

IN RE:
Review of the Puerto Rico Electric Power
Authority Integrated Resource Plan

CASE NO. NEPR-AP-2023-0004

**SUBJECT: Motion Submitting Supplemental
Response to RFI 5 in Compliance with Bench
Order**

**MOTION SUBMITTING SUPPLEMENTAL RESPONSE TO REQUEST FOR
INFORMATION NUMBER 5 IN COMPLIANCE WITH BENCH ORDER**

TO THE PUERTO RICO ENERGY BUREAU:

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

1. On September 27, 2023, this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order in this proceeding, whereby it ordered LUMA’s personnel to attend the second IRP pre-filing Technical Conference scheduled for October 31, 2023 (the “second pre-filing Technical Conference”), together with its technical consultant (“September 27th Order”). The Energy Bureau also ordered LUMA to respond to a series of Requests for Information (“RFI’s”) included as Attachment B of its September 27th Order.

2. On October 24, 2023, LUMA submitted its responses to the RFI’s included as Attachment B of the September 27th Order. See, *Motion Submitting Responses to Request for Information Issued Through Resolution and Order Dated September 27th Order*.

3. The second pre-filing Technical Conference was held on October 31, 2023. During the discussion of the presentation and the responses to the RFI’s, the Energy Bureau directed

LUMA to present an updated version of the electric vehicle charging impact forecast (“EV Forecast”) developed by the Puerto Rico Grid Resilience and Transitions to 100% Renewable Energy Study (“PR100 Study”) of the United States Department of Energy (“DOE”) because the version originally submitted did not include the forecast for three (3) of Puerto Rico’s municipalities. LUMA informed at the time that it would be procuring the information from the PR100 Study.

4. In compliance with the Energy Bureau’s bench order issued during the second pre-filing Technical Conference, LUMA includes herein as *Exhibit 1* a supplemental response to RFI 5 which includes an explanation as to the zero values assigned to three municipalities in the EV Forecast.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **accept** *Exhibit 1* of this Motion and **deem** LUMA in compliance with the Energy Bureau’s directive for LUMA to supplement to its response to RFI 5.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of November 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 Lionel.santa@prepa.pr.gov, and to Genera PR, LLC through, brannen@genera-service.com, kbolanos@genera-pr.com, regulatory@genera-pr.com.



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Exhibit 1

(supplemental Response to RFI 5)



PR100 Electric Vehicle Charging Forecast

NEPR-AP-2023-0004
November 14, 2023

Supplemental Response to RFI 5: Electric Vehicle Charging Forecast

During the Second Prefiling Technical Conference held on October 31, 2023, the Energy Bureau questioned why three (3) municipalities (Culebra, Maricao, and Vieques) had zero values in the “Municipio-level Electric Vehicle (EV) charging forecast” submitted by LUMA in response to the Request of Information number 5 of the Resolution and Order of September 27, 2023 (September 27 R&O). LUMA indicated that the EV charging forecast was developed by the Department of Energy’s Puerto Rico Grid Resilience and Transition to 100% Renewable Energy Study (PR100), and that LUMA would need to seek a response to the Energy Bureau’s question from the PR100 project team. After the October 31st Second Prefiling Technical Conference LUMA requested from the PR100 team the missing information from these three (3) municipalities for the EV charging forecast.

The PR100 project team members explained that the EV charging forecast was developed for all of Puerto Rico and then allocated to the individual municipalities. PR100 did not have sufficient data from the three (3) municipalities to include them in the allocation of the EV charging forecast. Even if PR100 had sufficient allocation data available for the three (3) municipalities, it would not have changed the total Puerto Rico EV charging forecast. The data would only have modified the allocations to other municipalities. PR100 indicated the lack of an EV charging load allocation to the three municipalities did not have an impact on the overall results of its analysis.

LUMA plans to structure the modeling of loads and resources in the 2024 IRP based on dividing Puerto Rico into eight (8) Transmission Planning Areas (TPAs), with each TPA representing a group of municipalities. LUMA plans to divide the EV charging forecast from the PR100 into the eight (8) TPAs for the 2024 IRP. The three (3) municipalities in question (Culebra, Maricao, and Vieques) collectively represent 0.4% of Puerto Rico’s total population¹. Further, the three (3) municipalities are in two different TPAs. Due to the size of the three (3) municipalities, and LUMA’s planned aggregation of the EV charging loads into TPAs, LUMA believes the lack of EV charging forecast data for the three (3) municipalities will not have an impact on the overall TPA EV charging forecasts, TPA load forecasts or the results of the 2024 IRP energy resource modeling.

¹ Based on the 2022 US Census data.