

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

**NEPR**

**Received:**

**Nov 14, 2023**

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**IN RE:**

Review of the Puerto Rico Electric Power  
Authority Integrated Resource Plan

**CASE NO. NEPR-AP-2023-0004**

**SUBJECT: Request for Modification of Timeline for  
2024 IRP Filing**

**REQUEST FOR MODIFICATION OF TIMELINE FOR 2024 IRP FILING**

**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 Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in this docket, whereby it initiated the instant administrative proceeding for the review of the proposed Integrated Resource Plan to be filed by LUMA as the agent for the Puerto Rico Electric Power Authority (the “July 12<sup>th</sup> Order”).

2. Through the July 12<sup>th</sup> Order, the Energy Bureau also 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 31<sup>st</sup> Motion”), through which LUMA informed the Energy Bureau of certain delays impacting the contracting of the IRP Technical Consultant.

3. Through the July 12<sup>th</sup> Order, the Energy Bureau also granted LUMA's request as included in the March 31<sup>st</sup> Motion, that the Energy Bureau schedule the initial Prefiling Technical Conference regarding the review of the 2024 Proposed IRP to no earlier than May 2023 to provide sufficient time for LUMA to be able to complete the technical consultant contracting process before the technical conference. Accordingly, the Energy Bureau scheduled the 2024 Proposed IRP Prefiling Initial Technical Conference pursuant to the *Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority*, Regulation No. 9021 dated April 20, 2018, for August 8, 2023 (the "August 8<sup>th</sup> Technical Conference").

4. During the August 8<sup>th</sup> Technical Conference, LUMA anticipated the possibility of the need to modify the 2024 Proposed IRP submission date to account for the delays in the contracting process of its technical consultant.

5. On August 30, 2023, LUMA filed a *Motion Submitting Revised Version of Exhibit I of Final Contract for Technical Consultant and Related Documents, Request for Approval of Final Contract, and Request for Confidential Treatment* whereby, in what is pertinent, it submitted a revised Exhibit I in the terms discussed with the Energy Bureau during the August 8<sup>th</sup> Technical Conference and requested that the Energy Bureau approve the revised version of Exhibit I of the technical consultant contract.

6. On September 7, 2023, the Energy Bureau issued a Resolution and Order approving the revised technical contract between LUMA and the technical contractor and scheduled a second IRP prefiling conference for October 31, 2023 (the "second pre-filing Technical Conference").

7. On September 27, 2023, the Energy Bureau issued a subsequent Resolution and Order, whereby it ordered LUMA's personnel to attend the second prefiling Technical Conference together with its technical consultant ("September 27<sup>th</sup> Order"). The Energy Bureau issued, as

Attachment A to its September 27<sup>th</sup> Order, an Agenda for the October 31<sup>st</sup> technical conference and ordered LUMA to prepare a presentation in accordance with the agenda and to submit it by October 25, 2023. The Energy Bureau also ordered LUMA to respond to a series of Requests for Information (RFI's) included as Attachment B of its September 27<sup>th</sup> Order.

8. On October 24, 2023, LUMA submitted its responses to the RFIs included as Attachment B of the September 27<sup>th</sup> Order. *See, Motion Submitting Responses to Requests for Information Issued Through Resolution and Order Dated September 27, 2023.*

9. In further compliance with the September 27<sup>th</sup> Order, on October 25, 2023, LUMA submitted a copy of the presentation materials prepared in accordance with the Agenda for the second pre-filing Technical Conference (the "Presentation"). *See, Motion Submitting Presentation for Second Pre-filing Technical Conference in Compliance with Resolution and Order dated September 27, 2023.*

10. The second pre-filing Technical Conference was held on October 31, 2023. During the same, LUMA discussed the Presentation and answered the questions posed by the members of the Energy Bureau. LUMA also had the opportunity to introduce its technical consultant for the 2024 IRP filing, Black and Veatch ("B&V").

11. In what is pertinent, during the second pre-filing Technical Conference, LUMA proposed the revised IRP filing date of June 28, 2024 and espoused the reasons supporting its request for a modification of the current deadline of March 1, 2024. *See, slide 45 of the Presentation.* At the closing of the technical conference, this Energy Bureau directed LUMA to submit its request in writing for the Energy Bureau's consideration.

12. As discussed during the second pre-filing Technical Conference, once the technical consultant was onboarded, LUMA and B&V worked diligently to develop a revised schedule that

takes into account the considerable work entailed by the 2024 IRP submission, the interrelation of the LUMA and B&V tasks for the 2024 IRP and the sequential nature of those tasks. *See*, slide #45 of the Presentation.

13. The requested revised filing date of June 28, 2024 represents the earliest reasonable date that LUMA and B&V can commit to complete the remaining tasks detailed in slide 45 of the Presentation and be in position to file the rigorous and comprehensive analysis required for the 2024 IRP.

14. In compliance with the Energy Bureau's bench order, LUMA includes herein as *Exhibit 1*, the revised timeline with a summary of the explanations supporting LUMA's request. LUMA respectfully sets forth that, as per its discussion with B&V and based on the technical consultant's vast experience, the normal scope of a regular IRP will typically require approximately nine to twelve months to complete. The 2024 IRP, however, involves added complexities in its planned scope of work which includes eight separate planning areas as opposed to the more common single planning area, integrated transmission modeling, and distributed energy resource modeling. Those characteristics of the 2024 IRP, in addition to the transmission and distribution areas and additional sensitivities that will be considered, require additional time to develop and, consequently, the modification of the submission date as requested herein.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the information included in this motion, **grant** LUMA's request for modification of the 2024 Proposed IRP filing date to June 28, 2023 and **deem** the Energy Bureau's bench order issued during the second pre-filing Technical Conference complied with as it relates to the written submission of the request to modify the IRP filing date.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico on November 14, 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 [Lionel.santa@prepa.pr.gov](mailto:Lionel.santa@prepa.pr.gov); and to Genera PR LLC through [brannen@genera-services.com](mailto:brannen@genera-services.com); [kbolanos@genera-pr.com](mailto:kbolanos@genera-pr.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com).



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*Exhibit 1*



# Integrated Resource Plan Status Report

NEPR-AP-2023-0004  
November 14, 2023

# 2024 Revised IRP Schedule

## Key Arguments

- For an IRP, the term to complete an IRP requires approximately 9 to 12 months.
- The 2024 IRP is more complex than other IRPs with a common single planning area because it will require the analysis of eight separate planning areas, integrated transmission modeling, distributed energy resource modeling, and additional sensitivities.
- LUMA has worked diligently to develop a revised schedule incorporating the considerable work that is required to complete the 2024 IRP.
- The revised IRP schedule also considers the time required for stakeholder engagements throughout the development of the IRP to seek input and provide interim results to the public.
- The requested revised filing date of June 28, 2024, represents the earliest reasonable date that LUMA can commit to completing the required work to file a rigorous and comprehensive analysis required for the 2024 IRP.

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November 14, 2023

Task	2023			2024						
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Stakeholder Consultations and Input										
Define IRP Objectives and Scenarios										
PLEXOS Model Data Load										
Modeling of First Scenario										
Modeling of Remaining Scenarios										
Sensitivity Modeling of Preferred Portfolio										
B&V Draft Report										
B&V Final Report										
LUMA Eng. Benchmark PLEXOS Load Flow with PSSe										
LUMA Eng Review PLEXOS results										
LUMA Eng. Transmission Modeling & Report										
LUMA Forecasts and Assumptions										
LUMA Distribution Analysis and Report										
LUMA IRP Filing Prep										
LUMA IRP File - June 28, 2024										★