

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

NEPR

Received:

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IN RE:
ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD
PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Motion to File FY 2024 Q1
TPP Report

MOTION TO SUBMIT FY 2024 Q1 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. Relevant Procedural History and Background

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, 2022¹ (“TPP”), containing the EE and DR Programs to be implemented by LUMA during a 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 established requirements related to various TPP program-related tasks and associated deadlines (*see* February

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*.

16th Resolution and Order on 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 Energy Bureau's Regulation for Energy Efficiency; 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 others, in Table 1 the deadlines of August 29, 2023 and November 29, 2023 were established to file the FY 2023 fourth quarter report ("FY2023 Q4 TPP Report") and the FY2024 first quarter report ("FY2024 Q1 TPP Report"), respectively. *See id.* The latter report is to cover the period from July 1, 2023 until September 30, 2023. The Energy Bureau also 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. This Energy Bureau issued Resolutions and Orders on April 3, 2023, June 15, 2023, and August 11, 2023, which modified certain deadlines for TPP activities or milestones established in the February 16th Resolution and Order. However, the TPP reporting deadlines and requirements discussed above remained unchanged.

5. On August 29, 2023, LUMA submitted the FY2023 Q4 TPP Report, in compliance with the February 16th Resolution and Order.

6. As of this date, this Energy Bureau has not issued reporting templates.

II. Submittal of FY2024 Q1 TPP Report

7. In compliance with the February 16th Resolution and Order, LUMA herein submits its FY2024 Q1 TPP Report reporting on the progress of the TPP as set forth in Section 6 of the TPP. *See Exhibit 1.* LUMA has also included in the FY2024 Q1 TPP Report information on certain achievements made during the months of October and November when the first DR program was successfully launched.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the FY2024 Q1 TPP Report in compliance with the requirements set forth in the February 16th Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29 day of November 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 the attorney for PREPA at jmarrero@diazvaz.law and lionel.santa@prepa.pr.gov; the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; and agraitfe@agraitlawpr.com, info@sesapr.org, bfrench@veic.org, shanson@veic.org, evand@sunrun.com, jordgraham@tesla.com, forest@cleanenergy.org, customerservice@sunnova.com, javrua@sesapr.org, pjcleanenergy@gmail.com, and mrrios@arroyorioslaw.com.



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Exhibit 1

FY 2024 TPP Q1 Report



Energy Efficiency and Demand Response Transition Period Plan: 2024 Q1

Reporting Period - July 2023 through September 2023

NEPR-MI-2022-0001
November 29, 2023

Content

- Introduction
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- Estimated Programs Costs
- Next Steps
- Conclusions

Introduction

LUMA is pleased to submit its second Energy Efficiency and Demand Response 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) to build a more reliable, and resilient energy system for the people of Puerto Rico. As the system operator, 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, which are required by law and mandated by the Energy Bureau.

The information included in this report represents the period between July 1, 2023, through September 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. This report also includes significant updates after the July to September period.

Progress - LUMA's Activities and Achievements

LUMA's recent accomplishments include:

August 2023

- Finalized the design and development of the first Customer Battery Energy Sharing (CBES) pilot program in Puerto Rico, after gathering input and information from aggregators.

October 2023

- Selected an Energy Efficiency Implementation Contractor and signed Multiple Aggregation Agreements.

October 2023

- Signed a work order with the Energy Efficiency Implementation Contractor to develop and launch a Quick-Start Rebate program.

Progress - LUMA's Activities and Achievements

LUMA's recent accomplishments include:

November 2023

- Launched the Customer Battery Energy Storage Sharing (CBES) Initiative, a new battery demand response pilot program, with five third-party aggregators.
- Completed a successful test dispatch, allowing the pilot CBES program to officially begin activating demand response events when needed.
- A total of **953 customers enrolled** to participate in the CBES pilot program.
- Approximately **4.6 MW in battery capacity** is available for Emergency Demand Response Event.

Status – LUMA’s Activities and Achievements

TPP Program	Initiatives	Description	Status
Program Management and Implementation Strategies Sec. 5.0	Implementation Contractor Onboarding	Multiple Service Agreement was signed with the selected Implementation Contractor	Completed October 2023
Education and Outreach Program Sec. 4.2	Consumer Education	Energy savings tips on bill	In progress
Education and Outreach Program Sec. 4.2	Stakeholder Outreach	Active participation in bi-weekly meetings	In progress
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
Customer Battery Energy Sharing Program Sec. 4.3.2	Pilot Program	Use customer batteries to mitigate generation shortfalls (in process)	Launched in November 2023

Performance - Customer Education and Public Outreach

LUMA is actively communicating with customers and communities about energy efficiency tips and resources through different outreach channels, including:

- Educational messages on monthly bills and bill inserts
- Social Media posts and updates
- Website updates: <https://lumapr.com/residential/energy-saving-tips/>

November 2023

LUMA has participated in industry events such as the SESA Summit to educate about the Customer Battery Energy Sharing Program and Energy Efficiency.

- Energy educational brochure which has been distributed in conventions and meetings, including:
 - ASORE (Association of Restaurants of Puerto Rico)
 - SESA Summit (Solar and Energy Storage Association)
 - IRP Stakeholder Meetings
- Media interviews to discuss the recently launched CBES initiative.

Performance - Customer Education and Public Outreach

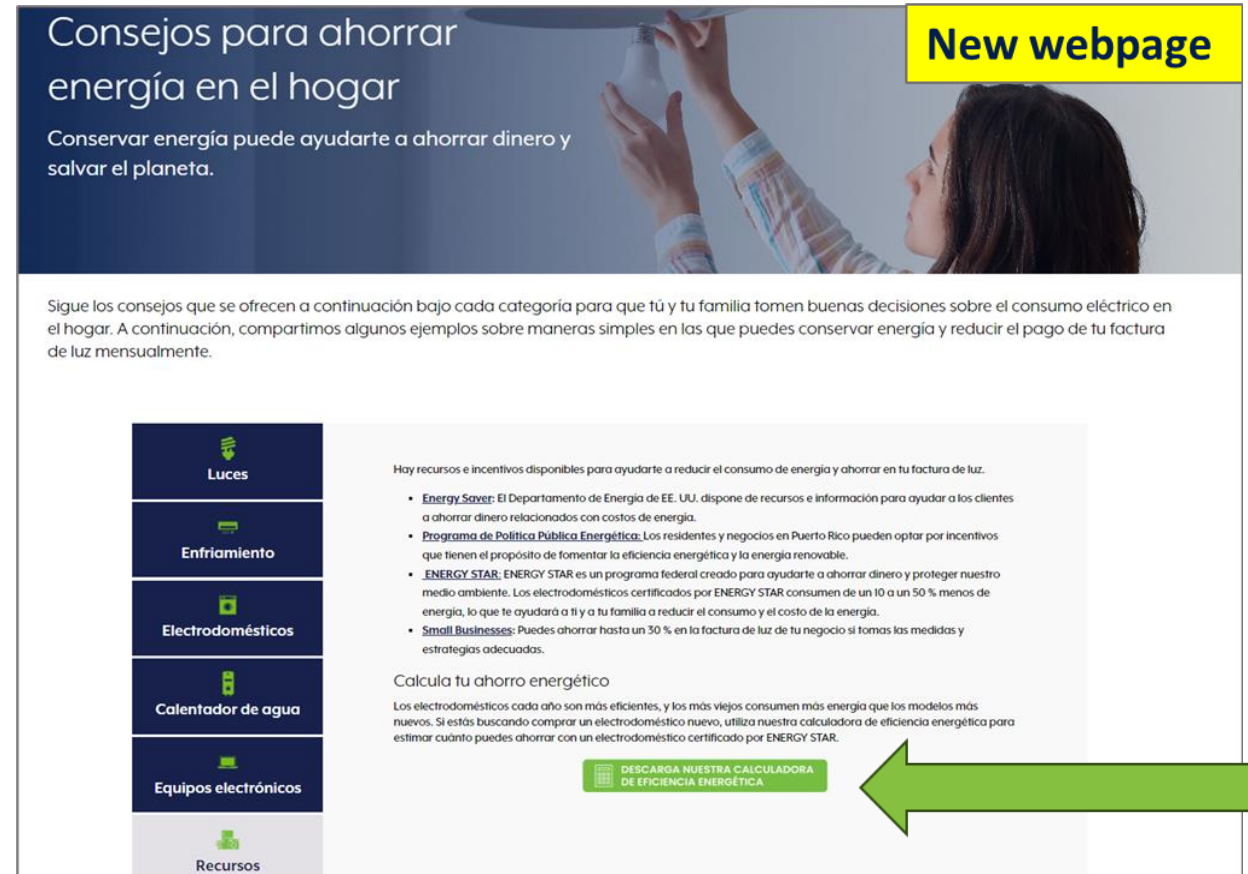
November 2023

- Participation in industry events, such as the SESA summit, to educate stakeholders about the CBES initiative and energy efficiency programs.
- LUMA personnel had thirteen public media appearances to educate about the recently launched Customer Battery Energy Sharing Program.

Customer incentive programs are being prepared for launch and will be accompanied by proactive media and outreach campaigns to continue to educate customers about energy savings opportunities and programs.

Improvements to LUMA's web page: Energy Saving Tips


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




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

Energy Savings Calculator


- LUMA's downloadable energy efficiency calculator helps consumers estimate how much it will cost to operate their current equipment and how much they could save by upgrading to energy efficient appliances.
- LUMA's calculator estimates costs for the following equipment :
 - Refrigerator / Freezers
 - Lighting
 - Water Heater
 - Window Air Conditioner (AC)
 - Mini-Split AC



Example


LEARN MORE AT
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

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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.

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

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



Energy Savings Tips on Customer Bill Inserts

Sample customer bill insert

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 Messages on Customer Bills

Example of educational messages on customer 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.





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.



Performance - Support to Key Strategic Groups

LUMA continues to support initiatives of key energy industry groups, including:

- Virtual Power Plant (VPPs) Proponents
- Interest groups such as the PR EE Working Group
- LUMA maintains regular engagement with local government agencies like the Department of Economic Development and Commerce (DEDC) and Energy Policy Program (EPP) to collaborate the creation and delivery of educational materials and joint outreach efforts.

Performance- LUMA's Community Streetlight Initiative (CSIS) Energy Savings

- LUMA is installing 300,000 streetlights across Puerto Rico over the next 3 years to help improve safety for our customers and increase energy efficiency in our communities. **Over 65,000 streetlights** have been installed.
- Every streetlight LUMA installs as part of the federally funded CSIS uses 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.

Results for Q1 FY2024

Period	Estimated Energy Savings (MWh)
Q1FY24	388

Estimated Programs Costs

Costs reported for Energy Efficiency programs in Q1 were related to professional services and LUMA out-of-pocket administrative costs.

Program	Estimated Costs
Residential Program	
Residential Rebates	\$0
C&I Program	
Business Rebates	\$0
Emergency DR	\$192,548
Economic DR	\$0
Education & Outreach	\$5,328
Cross-Cutting Planning, Administration & Startup costs	\$61,281

Next Steps

Program	Activity	Description
EE/DR	Design and implementation of transition programs	Planning to launch the first Rebate Program pilot in January 2024
EE	Consumer Education	Continue communicating energy saving tips on energy bill, bill inserts, social media
EE	Street Lighting Conversion Program	In Progress
EE	Identification of funds	In Progress
EE/DR	Interaction and support with key groups	In Progress
DR	Customer Battery Energy Sharing Program Program	In Progress



Conclusions

- **LUMA will continue to:**
 - Educate customers about the benefits of energy savings;
 - Engage with key stakeholders;
 - Enroll customers in the CBES program;
 - Monitor CBES program event activation performance; and
 - Coordinate with an Implementation Contractor to strategize the launch of the remaining programs outlined in the EE/DR Transition Period Plan.
- Evaluate periodically the results of the Customer Battery Energy Sharing Pilot Program related to enrollment and events when they are called.
- Work closely with the EE program Implementation Contractor to finalize EE program design details and prepare for the quick launch of the first Rebate Program.

