

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

NEPR
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**IN RE: ELECTRIC VEHICLE
CHARGING INFRASTRUCTURE
DEPLOYMENT**

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Motion to Submit January 2024 Billing
Integration Report In Compliance with Orders of
January 13 and February 14, 2023**

**MOTION TO SUBMIT JANUARY 2024 BILLING INTEGRATION REPORT IN
COMPLIANCE WITH ORDERS OF JANUARY 13 AND FEBRUARY 14, 2023**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES now LUMA Energy ServCo, LLC (“LUMA”), through the undersigned legal counsel, and respectfully states, submits and requests the following:

Pursuant to the orders issued on January 13, 2023¹ and February 14, 2023² by this Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”), requiring LUMA to submit every thirty (30) days, commencing on March 13, 2023, a report on LUMA’s progress with data collection and billing to integrate the Interim EV TOU Rate approved by the Energy Bureau (the “Billing Integration Report”),³ LUMA herein submits the Billing Integration Report for January 2024. *See Exhibit 1.*

¹ Under Resolution and Order issued on January 13, 2023, NEPR-MI-2021-0013, *In Re: The Deployment of Electric Vehicle Charging Infrastructure*, Subject: Draft Phase I EV Plan and Revised EV Rate Design (“January 13th Order”).

² Under Resolution and Order issued on February 14, 2023, NEPR-MI-2021-0013, *In Re: The Deployment of Electric Vehicle Charging Infrastructure*, Subject: Draft Phase I EV Plan and Revised EV Rate Design (“February 14th Order”).

³ See January 13th Order, page 11, as modified by February 14th Order, page 2.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; accept *Exhibit 1* in compliance with the reporting requirement for January 2024 under the Energy Bureau’s January 13th Order and February 14th Order with respect to the Billing Integration Reports.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 8th day of January 2024.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic courtesy copy of this motion to PREPA’s General Counsel, Lionel Santa, lionel.santa@prepa.com, the record attorney for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law and to the Independent Office of Consumer Protection by submittal to Hannia Rivera, hrivera@jrsp.pr.gov. LUMA understands that other participants or stakeholders in this proceeding will be notified as a result of the publicity of the filings in this process. Notwithstanding, LUMA will send a courtesy copy of the filing to the following stakeholders: agalloza@aggpr.com; alberto.cortes@warrendelcaribe.com; aldo@skootel.com; angel.d.rodriguez@outlook.com; antonio@velocicharge.com; apietranтони@pmalaw.com; azayas@azeng.net; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com; carloxcdeno@gmail.com; clrivera@caguasexpressway.com; flota@caguasexpressway.com; cnegrette@solrenew.com; CR.Tejera@ddec.pr.gov; dacosta@aggpr.com; daniel.perez@totalenergies.pr; dcordero@group-em.com; direxec@ciapr.org; divine.energy@hotmail.com; ecruz@pmalaw.com; eduardo.pinera@toyota.com; Edwin.Acevedo@ddec.pr.gov; emelyies.torres@toyota.com; epenergypr@gmail.com; erica.cosme@gsonnell.com; Fberrios@peritoselectricistas.org; francisco.berrios@hotmail.com; franciscojrullan@yahoo.com; gerard.berlinski@toyota.com; gerardo_cosme@solartekpr.net; gperez@solrenew.com; hamely@motorambar.net; ialsina@plazalasamericas.com; idiaz@glenninternational.com; info@carlosmatta.com; jack@pantekpartners.com; jameauxl@aim.com; jan.rodriguez@toyota.com; javrua@sesapr.org; jbouza@caguasexpressway.com; jcardona@aggpr.com; jmartinez@pmalaw.com; jorrodriguez@motorambar.net; jortiz@caguasexpressway.com; jose.maeso@crowley.com; jpibernus@motorambar.com; JSantana@motorambar.com; jtosado@motorambar.net; juan.diaz.galarza@guidehouse.com; jvazquez905@gmail.com; kenan.d.davila@sargentlundy.com; kkoch@tesla.com; l.marcano@aconer.org; lsundeen@tesla.com; luisgmoreno@gmail.com; Marangelly.Cruz@toyota.com; marilyn.maldonado@toyota.com; mlandron@plazaad.com; mpietranтони@pmalaw.com; nannette.berrios@solpetroleum.com; nmontes@ccmpr.com; nrodriguez@senado.pr.gov; Ochavez@Padigm.com; odette@grupofernandezpr.com; omundo@plazalasamericas.com; patlopez00@gmail.com; dany.oliva@toyota.com; pjcleanenergy@gmail.com; rdiaz@glenninternational.com; repagan@burnsmcd.com; rroy@tcm.law; Ruben.Gonzalez@pumaenergy.com; rvega@guidehouse.com; salvadorlopez5@hotmail.com; shehaly.rosado@ddec.pr.gov; Veronica@pantekpartners.com; Victor.Aponte@toyota.com;

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Exhibit 1

Monthly Billing Integration Report



Monthly Billing Integration Report: Data Collection and Billing to Integrate the Interim EV Time of Use (TOU) Rate

NEPR-MI-2021-0013
January 8, 2024



EV Billing Integration Status Update

G On target
 Y Caution
 R Off plan
 C Complete

Key Activity Summary

- Billing system integration efforts continue with the 3rd party telematics vendor. Key configuration details are being documented for system requirements. Requirements continue to be finalized and the design and development process will get underway.
- Build and test Oracle CC&B process to receive EV Time of Use (TOU) Data. 3rd party telematics vendor will send aggregated vehicle data to LUMA through established secure transmission protocols, then the CC&B system will use the aggregated consumption data to generate the detail for charges on customer bills.
- Continued work through IT/Cybersecurity protocols to ensure proper design and permissions to mitigate potential implementation challenges.
- New features and resources included in the LUMA Electric Vehicle website. For example, tabs with a brochure for download with valuable information and resources regarding EVs and an EV survey.
- Customer outreach and EV TOU tariff communications plan was developed. LUMA continues to update the plan in alignment with ongoing billing system integration efforts and in compliance with the January 13, 2023, Resolution and Order.

Key Milestones

Key Milestones	Date	Status
Development and execution of customer outreach and EV TOU tariff communications plan	September – December	C
Electric Vehicle Website was updated. This is an ongoing effort to enable customers to engage with educational resources and LUMA offerings.	November - December	C
Development and execution of customer facing materials.	Ongoing	G
Build and test Oracle CC&B process to receive EV Time of Use (TOU) data	March	R*
Launch production processes and monitor steps	April	R*

Risks / Issues:

- Uncertainties in implementing an innovative methodology will require additional time for appropriate design and testing.
- Limitations associated with existing billing system require non-standard technical requirements and solutions to reach desired end product.
- Technical questions are being addressed with the 3rd party telematics vendor. Testing and validation have yet to commence. Integration of the Interim EV TOU Rate is expected to commence within the 6-month timeframe estimated in the previous EV TOU Billing Integration Reports.
- *These milestones are shown as “off plan” in light of the timeline set forth in the Energy Bureau’s Resolution and Order of December 20, 2023. LUMA had forecasted the process of integration would be 3-6 months following completion of vendor onboarding, depending on testing and validation. Following a thorough evaluation, LUMA and the vendor have established a 6-month integration timeline. LUMA will be submitting a request to the Energy Bureau to clarify this timeline.