

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

**NEPR**

**Received:**

**Feb 1, 2024**

**10:12 PM**

**IN RE:**

Review of the Puerto Rico Electric Power  
Authority Integrated Resource Plan

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

**SUBJECT: Amended Presentation for Third Pre-Filing  
Technical Conference**

**MOTION SUBMITTING AMENDED PRESENTATION FOR THIRD IN-PERSON PRE-  
FILING TECHNICAL CONFERENCE**

**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 December 20, 2023, this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in this proceeding whereby it ordered LUMA to attend the third in-person pre-IRP filing period technical conference scheduled for January 30, 2024 (the “Third Pre-Filing Technical Conference”). The Energy Bureau determined that LUMA should prepare to discuss certain elements of the Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority, Energy Bureau Regulation No. 9021 (“Regulation No. 9021”), regarding the features of the Transmission System; the ability to interconnect new renewable generation and battery storage projects; planned transmission and sub-transmission facilities; the Transmission System’s ability to “permit power exchange” with newly interconnecting independent power producers; and waivers identified thus far by LUMA of Regulation No. 9021 about existing or planned transmission facilities and transmission system analysis. *See* December 20<sup>th</sup> Order, p. 4.

2. The Energy Bureau directed that LUMA should file its presentation for the Third Pre-filing Technical Conference, three business days prior to January 30<sup>th</sup>. *See id.*, p. 5.

3. In compliance with the December 20<sup>th</sup> Order, on January 25, 2024, LUMA submitted with this Energy Bureau, the presentation materials that were prepared for the Third Pre-Filing Technical Conference.

4. The Third Pre-Filing Technical Conference was held as scheduled on January 30, 2024. LUMA's representatives discussed the presentation materials and answered questions by the Energy Bureau Commissioners and Consultants.

5. While discussing the presentation materials during the Third Pre-Filing Technical Conference, LUMA informed that a minor revision to the presentation materials on slide 31 was needed to correct the obligation status of FEMA project #180326 to "existing 115 kV - Line 36800 Palmer Fajardo to Sabana Llana. The presentation materials have been amended accordingly to input that revision.

6. Secondly, slide 42 of the presentation materials was revised to include the complete reference to Section 2.03 J 1. e) of Regulation No. 9021 that is referenced in the first bullet of said slide.

7. Thirdly, the column header on EV Growth in slide 55, was revised to eliminate an asterisk that was included in error.

8. Fourthly, during the Technical Conference the selected scenarios and characteristics of studies and modeling for the IRP were discussed in connection with slide 55 of the presentation materials. In the course of those discussions, Mr. Michael Mount, Lead IRP Technical Expert for LUMA, explained the scenarios selected for the IRP and the variable characteristics of each scenario. Mr. Mount also explained that an additional test will be applied

to a short list of selected Portfolios using sensitivity analyses. Said discussion was illustrated during the Third Pre-Filing Technical Conference with information that was shared on-screen in the live stream of the Technical Conference. The presentation materials were revised to include the Sensitivity Runs table that was shared on-screen during the Third Pre-Filing Technical Conference, *see Exhibit 1* of this Motion, slide 56.

9. To ensure that the administrative record includes presentation materials that accurately reflect the discussions of the Third Pre-Filing Technical Conference, LUMA hereby submits an updated and amended version of the presentation materials for the Third Pre-Filing Technical Conference. *See Exhibit 1.*

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **accept** the updated and amended version of the presentation materials for the Third Pre-Filing Technical Conference that is submitted as *Exhibit 1* of this Motion and **issue** any orders that this Energy Bureau deems proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico on February 1, 2024.

**I HEREBY CERTIFY** that I filed this notice and request using the electronic filing system of this Puerto Rico Energy Bureau and that courtesy copy of this motion was notified to counsel for PREPA, Lionel.santa@prepa.pr.gov; and to Genera PR LLC through brannen@genera-services.com; kbolanos@genera-pr.com; regulatory@genera-pr.com.



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*Exhibit 1*  
*Updated and Amended Presentation for Third Pre-Filing Technical Conference*



# Review Proceeding and Prefiling Technical Conference for the 2024 IRP - (Phase 3) NEPR-AP-2023-0004

January 30, 2024

Please Note: All information presented in this third pre-filing IRP technical conference of 01/30/2024 is preliminary and subject to change as the 2024 IRP development and T&D studies and plans continue to progress.

01/30/2024



# Proposed Agenda

1. Introduction
2. Features of the transmission system
3. Ability of the existing system to interconnect new renewable generation and battery storage projects
4. Description of planned transmission and sub-transmission facilities
5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers
6. Waivers identified thus far by LUMA of Regulation 9021 about existing or planned transmission, and transmission system analysis
7. SETPR Update



# 1. LUMA Introduction

01/30/2024



# 1. LUMA Introduction

- This presentation is prepared in compliance with the Energy Bureau’s Resolution and Order of December 20, 2023 (December 20<sup>th</sup> R&O) to discuss key elements of Regulation 9021 related to the transmission system and current plans to address Puerto Rico’s need to connect new renewable resources and to integrate resources, such as battery energy storage systems. The presentation considers Regulation 9021 requirements and ongoing lessons learned through studies and processes to date –and planned –for interconnection studies for Tranches 1, 2, 3, and later tranches of renewable energy procurement in Case No. NEPR-MI-2020-0012.
- The focus of today’s discussion is based on key gaps and challenges, transmission planning, reliability criteria, and industry standards and best practices.

## 2. Features of the Transmission System

## 2. Features of the Transmission System

Features of the Transmission System, as described in Section 2.03 (J) (1) (a) (i):

- i. A summary of the characteristics of all existing transmission and sub-transmission facilities of thirty-eight kilovolts (38 kV) or higher;
- LUMA plans and operates a transmission system with the following characteristics:

Voltage (kV)	Line count	Miles
38	185	1,563
115	46	711
230	12	424
<b>Total</b>	<b>243</b>	<b>2,698</b>

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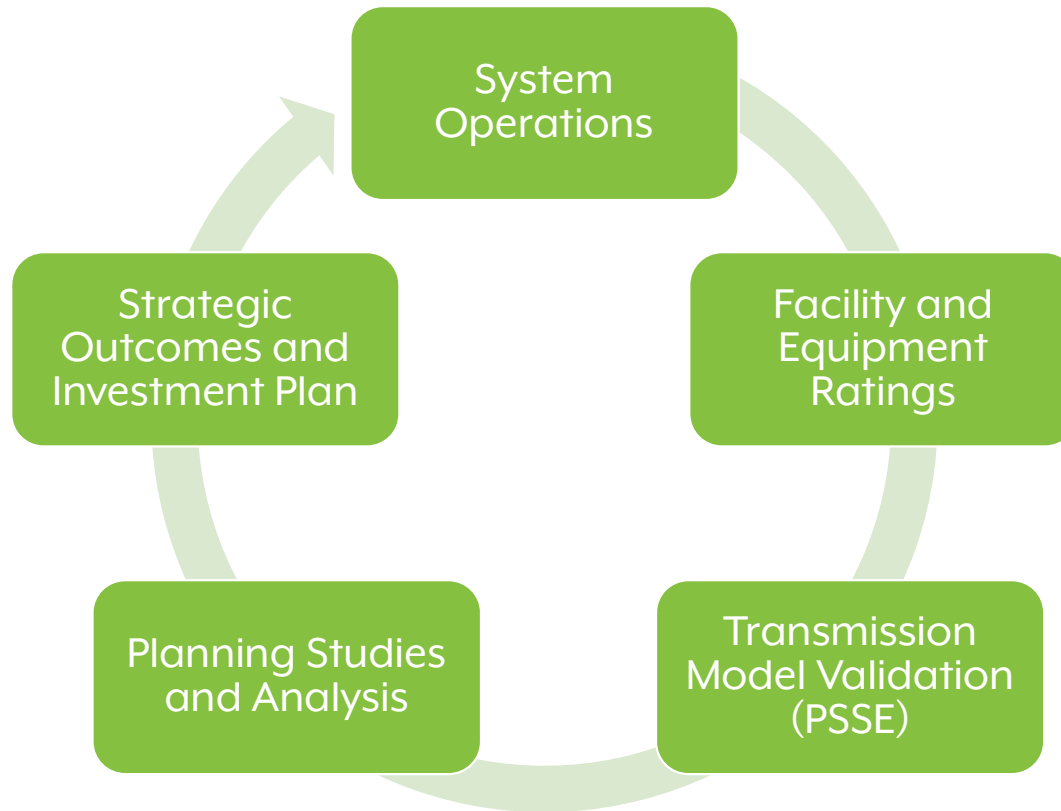
## 2. Features of the Transmission System (Cont.)

### Transmission Planning Process Overview

- An overview of the transmission system
- An overview of the transmission planning process
- NERC and Reliability Standards
- Gaps to Overcome
- How LUMA incorporates NERC Standards into Transmission Planning

## 2. Features of the Transmission System (Cont.)

### Transmission Planning Process Overview



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## 2. Features of the Transmission System (Cont.)

**NERC**  
NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

Facility Ratings  
(FAC)



Model Validation  
(MOD)



Transmission  
Planning (TPL)



Voltage and  
Reactive (VAR)

**NERC's mission**

***“To assure the effective and efficient reduction of risks to the reliability and security of the grid.”***





## 2. Features of the Transmission System (Cont.)

### Transmission Planning Process Overview

Topic	Critical Components
System Operations	<ul style="list-style-type: none"> <li><input type="checkbox"/> Reliability operational performance</li> <li><input type="checkbox"/> Asset health and physical condition</li> <li><input type="checkbox"/> Risk and exposure (e.g. hurricane, flood, wildfire)</li> <li><input type="checkbox"/> Resilience needs</li> </ul>
Facility and Equipment Ratings	<ul style="list-style-type: none"> <li><input type="checkbox"/> Develop ratings consistent with industry standards and best practices</li> <li><input type="checkbox"/> Routine verification of facility and equipment ratings</li> <li><input type="checkbox"/> Identifying mismatches between asset records, and actual field conditions</li> </ul>
Transmission Model Validation (PSSE)	<ul style="list-style-type: none"> <li><input type="checkbox"/> Current-year power flow models reflect actual System Operations</li> <li><input type="checkbox"/> Generation portfolio, expected dispatch, and renewable integration</li> <li><input type="checkbox"/> Future-year power flow models incorporate planned projects</li> </ul>
Planning Studies and Analysis	<ul style="list-style-type: none"> <li><input type="checkbox"/> With both current and predictive models, planners assess future scenarios</li> <li><input type="checkbox"/> Plan solutions for manage and maintain reliability for expected system changes</li> <li><input type="checkbox"/> Sensitivity analyses to ensure the system can handle uncertainty</li> </ul>
Strategic Outcomes and Investment Plans	<ul style="list-style-type: none"> <li><input type="checkbox"/> Solving for multiple objectives: the future scenarios</li> <li><input type="checkbox"/> IRP guides generation resource mix decisions</li> <li><input type="checkbox"/> Strategic grid focus to improve reliability, increase resilience, modernize T&amp;D infrastructure, integrate clean energy, enable customer choice, reduce risks like wildfire</li> </ul>



## 2. Features of the Transmission System (Cont.)

### Gaps to Overcome

- Puerto Rico's transmission grid does not meet industry standards today
  - Evidenced by the history of poor reliability and performance
- Asset Records and Data Are Inaccurate and Inadequate for Planning
  - Adopting Facility Ratings (NERC - FAC) standards will provide LUMA consistent methodology to establish, manage, and maintain accurate data and records
  - Adopting Transmission Models (NERC - MOD) standards will provide LUMA with quality digital power flow models that match the physical grid, and creating confidence in analysis and proposed mitigation solutions
- Existing Grid Conditions
  - Transmission Planning and Reliability Criteria (TPL) standards set clear guidelines for acceptable reliability performance of the Transmission Grid
  - Plans for transmission and substation rebuilds are addressing critical weaknesses that do not meet industry standards today
- We can improve by voluntary adoption of industry standards and best practices
  - NERC and industry standards like it provide a practical roadmap to improve PR's Transmission Grid
  - LUMA is driving towards adherence to industry standards and best practices

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### **3. Ability of the existing system to interconnect new renewable generation and battery storage projects**

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### **3. Ability of the existing system to interconnect new renewable generation and battery storage projects**

**The ability of the existing system to interconnect new renewable generation and battery storage projects, as described in Section 2.03 (J) (1) (a) (ii):**

- ii. A discussion of whether the transmission system constrains the transfer of electricity from existing projects, potential new projects, or projects under development or consideration, including a description of its ability to interconnect intermittent renewable generation projects and microgrids, as applicable, and with as much specificity as practical**

### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

ii. A discussion of whether the transmission system constrains the transfer of electricity from existing projects, potential new projects, or projects under development or consideration [...]

- Generation integration capacity is size and location dependent
  - Each injection point's characteristics must be analyzed individually
  - Grid capacity and constraints change with each successive interconnection
- Multiple variables impact the final recommendation
  - The grid has available capacity – but the grid does not have unlimited available capacity
  - As renewables and other generation interconnect, grid conditions change
  - Each new interconnection affects future available capacity for all others
  - A project's size, physical location and timing of the individual interconnection matters
- LUMA's focus is on safety, reliability, and affordability, also with interconnections
  - Methodologies and adherence to industry standards (facility ratings, models, studies)
  - Ensure that existing projects, potential new projects, or projects under development or consideration can be interconnected safely, at a reasonable cost
  - All while maintaining a reliable, safe, and secure transmission grid

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# 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

## Illustrative Example

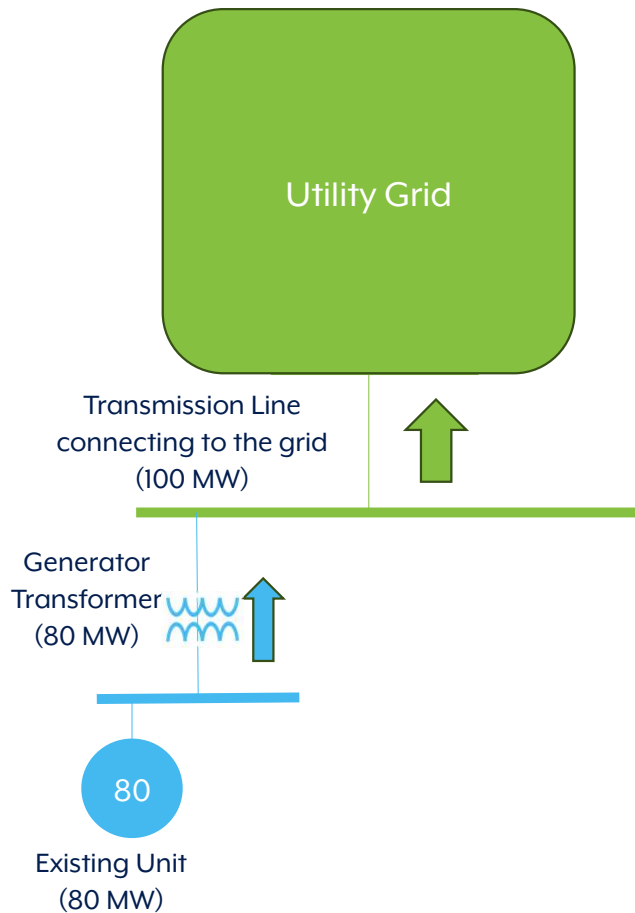
- The following example will illustrate possible interconnection scenarios :
  - Scenario A: the grid interconnection capacity, base case
  - Scenario B: the grid with available interconnection capacity, possible constraints
  - Scenario C: the grid with available interconnection capacity, no constraints
  - Scenario D: the grid constrains interconnection capacity, and possible solutions

### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

## Illustrative Example

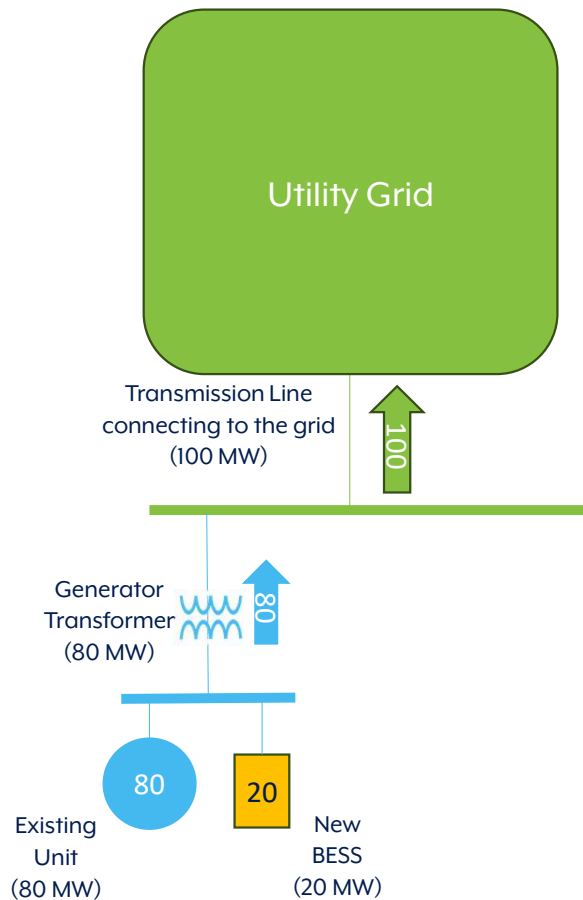
### Scenario A Description

1. An existing generator (80 MW) connected through a generator step-up transformer (80 MW), connected to the utility grid via a transmission line (100 MW).
2. There are no transmission constraints to this system.



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### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)



#### Illustrative Example Scenario B Description

1. An existing generator (80 MW) connected through a generator step-up transformer (80 MW), connected to the utility grid via a transmission line (100 MW).
2. The generator applies to connect a 20 MW battery.
3. The generator step-up transformer is a constraint limiting total injection to 80 MW. The battery can still interconnect, but combined output is limited to 80 MW.
4. The generator step-up transformer can be upgraded to 100 MW, to eliminate any constraints on injection capacity.
5. The utility transmission line rated at 100 MW does not constrain generator or battery injection.

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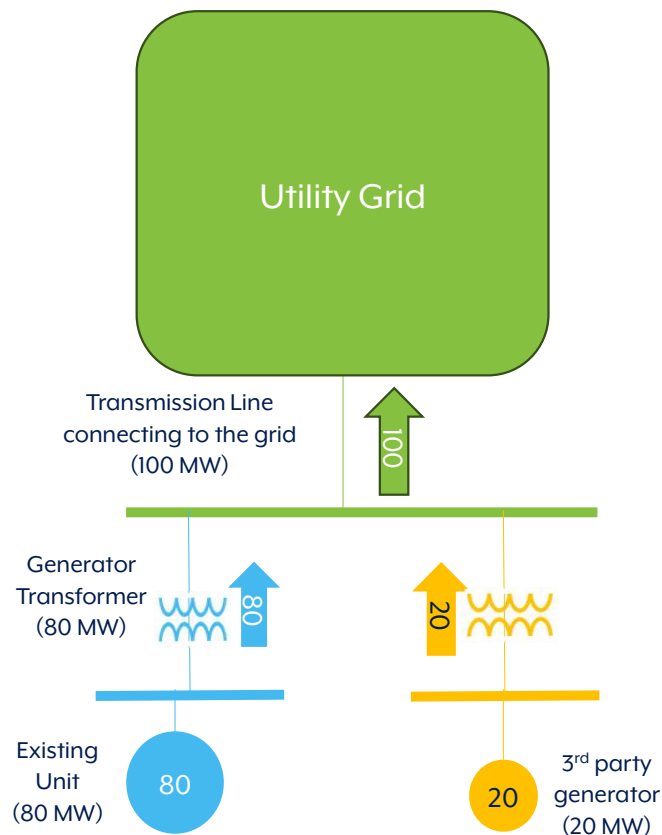


### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

## Illustrative Example

### Scenario C Description

1. An existing generator (80 MW) connected through a generator step-up transformer (80 MW), connected to the utility grid via a transmission line (100 MW).
2. A new 3<sup>rd</sup> party developer applies to connect a 20 MW PV or battery close to the existing plant.
3. There are no utility transmission constraints to this system. Both existing unit (80 MW) and 3<sup>rd</sup> party generator (20 MW) can inject at maximum capacity for total injection of 100 MW.

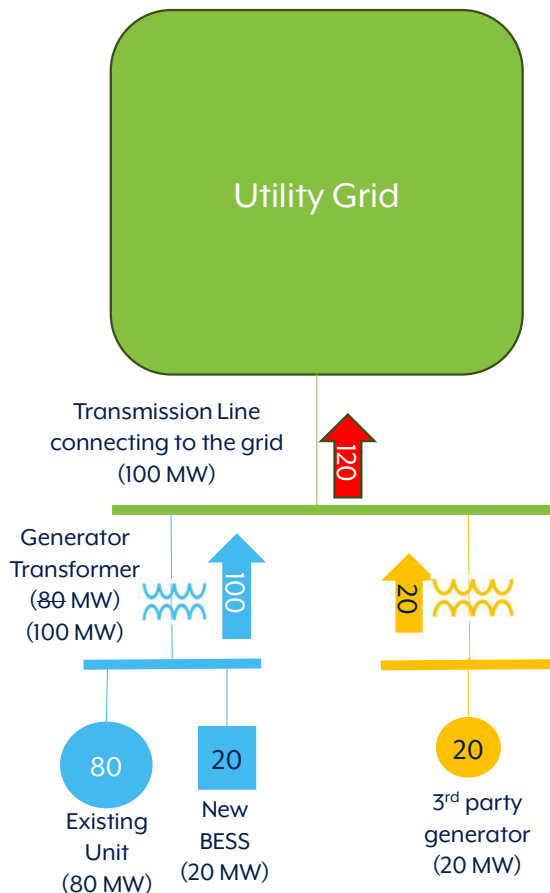


### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

## Illustrative Example

### Scenario D Description

1. An existing generator (80 MW) connected through a generator step-up transformer (80 MW), connected to the utility grid via a transmission line (100 MW).
2. The existing generator applies to connect a 20 MW battery.
3. A new 3<sup>rd</sup> party developer applies to connect a 20 MW PV or battery close to the existing plant.
4. The combined maximum output of existing unit (80 MW), generator battery (20 MW) and 3<sup>rd</sup> party generator (20 MW) exceeds the rating of the utility transmission line (100 MW).
  - a) Note: until the generator transformer is upgraded, the transmission does not constrain the output of the plant. If the generator transformer is upgraded, then the utility transmission line may constrain output.
  - b) Option 1: operating agreements to limit total injection to 100 MW.
  - c) Option 2: upgrade the line to increase capacity to at least 120 MW.



### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

- Accurate asset data and models are required
  - The system is dynamic and constantly changing
    - Daily and weekly load and generation variations are managed by Grid Operators
    - Seasonal and long-term load and generation variations are evaluated in Transmission Planning
  - When one aspect of the system changes (e.g. a new generator interconnects), all others change
  - Accurate asset data and quality transmission models are needed
    - Both operating time-scales, and planning time scales, require accurate data and model
    - No two operating points are ever the same
- Transmission models must be improved
  - The ideal transmission digital model matches the physical grid
    - LUMA's operating experience shows that asset data and records still have gaps, and are being improved
  - Accurate models, and clean data are essential
    - Line, transformer, and equipment ratings, along with electrical parameters must be modeled accurately
    - Simulations identify constraints in the model, and then these must be manually verified, then are mitigated
    - Upgrade decisions are made based on simulation results only after field verification of constraints occurs
  - Models are updated to include expected future planned projects (future state)
    - Planned projects, load forecasts, and renewables integration (all are IRP inputs)



# 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

- Characteristics of a well-planned system
  - A reliable design, fault-tolerant, and flexible to accommodate both generation and load
    - Load and generation can have both temporal and spatial variability
    - The experiences of real-time grid operations are factored into modeling and planning scenarios
  - Operators require constant situational awareness
    - Tools like power flow studies, EMS, SCADA RTUs, line sensors
    - Response to events and disturbances require quick action, operational adjustments are available
- Available capacity today changes as developers confirm project status
  - There is capacity on LUMA's grid to integrate renewables
    - Tranche 1 and 2 studies completed, Genera BESS interconnection plans, other interconnection requests
    - Constraints will exist, but mitigation solutions are developed to enable interconnections to proceed
  - Available capacity for load and generation evolves as the grid is rebuilt
- Fault-tolerant

### 3. Ability of the existing system to interconnect new renewable generation and battery storage projects (Cont.)

- Proactive Transmission Planning Activities
  - FEMA Funded Transmission Line Rebuild Projects
    - Will provide resilient, hurricane-resistant infrastructure designed to handle 160+ mph winds
    - Will upgrade and standardize conductor sizes for improved grid performance
  - FEMA Funded Substation Rebuild Projects
    - Will provide resilient, high-reliability designs at critical substations
    - Will provide for easily expandable configurations to support renewable integration
  - Renewable Interconnections
    - Rigorous process to study and evaluate all proposed interconnectors
    - Network upgrades are proposed, after verifying field conditions and equipment data, to ensure reliable grid operations
- Standardization
  - Will provide known and confirmed capacity across the system

## 4. Description of planned transmission and sub-transmission facilities

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## 4. Description of planned transmission and sub-transmission facilities

**For potential planned transmission facilities, a detailed narrative description of planned transmission and sub-transmission facilities, over the next ten years as described in Section 2.03 (j) (1) (d), including i. through iv.:**

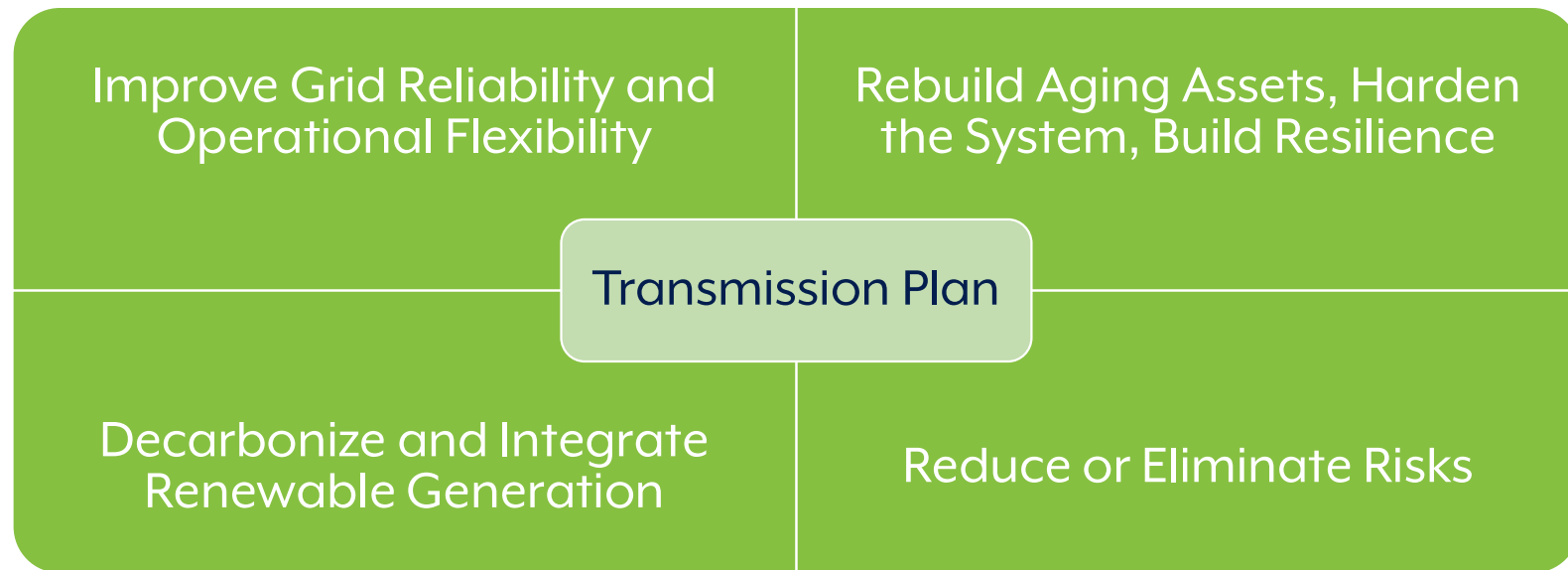
- i. New lines, including any requirements of new rights-of way;
- ii. Lines in which changes in capacity, either in terms of current, voltage or both, are scheduled to take place; and
- iii. Other changes in transmission lines or rights-of-way, which would be considered as substantial additions.
- iv. A listing of all proposed substations including size and location

## 4. Description of planned transmission and sub-transmission facilities

- LUMA Transmission Planning has undertaken various improvement initiatives
  - Consistent with NERC FAC criteria, improved field validation of facility ratings including conductor types and sizes and substation transformer nameplate information
  - Consistent with NERC MOD criteria, corrections and improvements to the transmission models are occurring consistently, as asset data is evaluated and validated, models are created and updated
  - Examples include validating and adding much of the 38kV network to transmission models
- LUMA Transmission Planning models form the basis for analysis
  - With improved transmission models (constantly being refined) additional gaps and risks are identified
  - Consistent with NERC Transmission Planning Criteria (TPL) and CIP standards LUMA continues to evaluate the T&D infrastructure using standards and industry best practices



## 4. Description of planned transmission and sub-transmission facilities (Cont.)



- Transmission Planning projects are proposed to solve multiple objectives
- Investments support these strategic goals to support all customers and stakeholders
- These plans are in development as the various IRP assumptions are refined, and improvements to asset data quality and simulation models support our transmission plan development
- LUMA expects projects to be proposed reported in the IRP

## 4. Description of planned transmission and sub-transmission facilities (Cont.)

A listing of all proposed substations including size and location are included in December 2023, FEMA 90-Day Plan (see December 14, 2023, filing in Case No. NEPR-MI-2021-0002)

- LUMA's T&D Planning and Engineering approach to substation investments
  - Replace damaged and out-of-service equipment
    - Examples include recent transformers energized at Conquistador, Sabana Llana, and Venezuela that have already been completed and additional sites that are in progress
  - Relocation or rebuilds of substations in floodways and flood zones
    - FEMA maps
  - Rebuilds to industry standards based on NERC TPL and CIP studies
    - These studies have identified reliability and resilience gaps that lead to the development of improved and modernized substation reliability designs

## 4. Description of planned transmission and sub-transmission facilities (Cont.)

- See FEMA 90-Day Plan with proposed Substations projects @

<https://energia.pr.gov/wp-content/uploads/sites/7/2023/12/20231214-MI20210002-Motion-Submitting-Update-TD.pdf>.

### Including below substations projects as examples:

FEMA Project #	Project Name	Obligation Status
174422	FAASt- Catano-Rebuilt 1808 (Substation)	\$23,255,049
550910	FAASt [Physical Security – Group 1] (Substation)	\$6,691,229
668669	Mayaguez TC	Pending Obligation
169266	FAASt Centro Medico 1327/1359 Equipment Repair & Replacement (Substation)	\$21,332,361

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## 4. Description of planned transmission and sub-transmission facilities (Cont.)

- See FEMA 90-Day Plan with proposed Transmission projects @

<https://energia.pr.gov/wp-content/uploads/sites/7/2023/12/20231214-MI20210002-Motion-Submitting-Update-TD.pdf>.

**Including below Transmission projects as examples:**

FEMA Project #1	Project Name	Obligation Status
166860	37800 – Jobos- Caguas	Pending Obligation
180326	Existing 115 kV – Line 36800 Palmer Fajardo to Sabana Llana	Pending Obligation
180052	Existing 38kV – Line 100, Line 200 Ponce TC to Jobos TC	Pending Obligation

## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers

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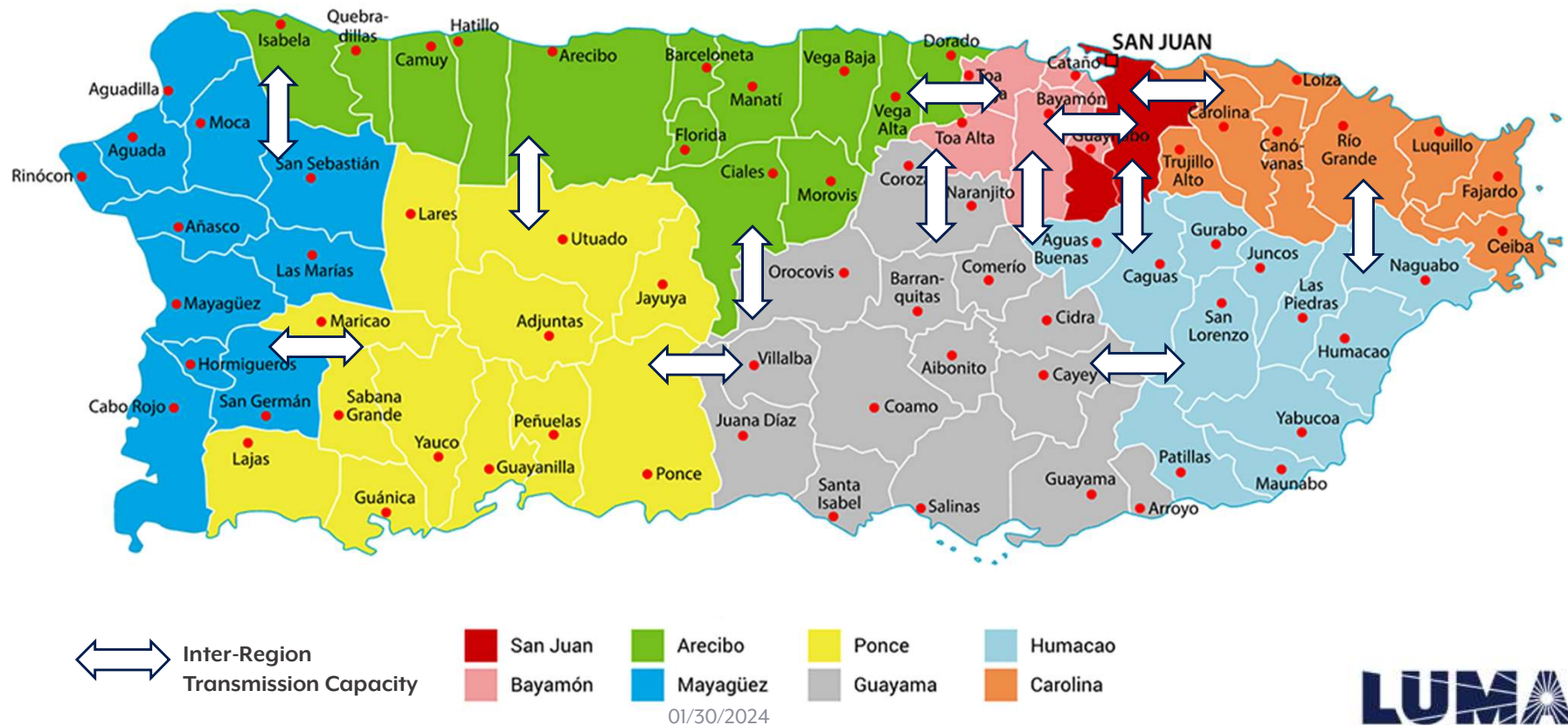
**5. For potential planned transmission facilities, the ability of the system to "permit power exchange" with newly interconnecting independent power producers, especially those contracted or under contract consideration for the tranches of renewable energy and battery storage projects, and as described in Section 2.03 (j) (1) (d) (ix):**

- ix. A high-level analysis of PREPA's transmission system's ability to permit power interchange with microgrids and other independent power producers. PREPA should provide examples of interconnection studies from recent renewable integration projects.

## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

### Baseline Transmission Transfer Capacity

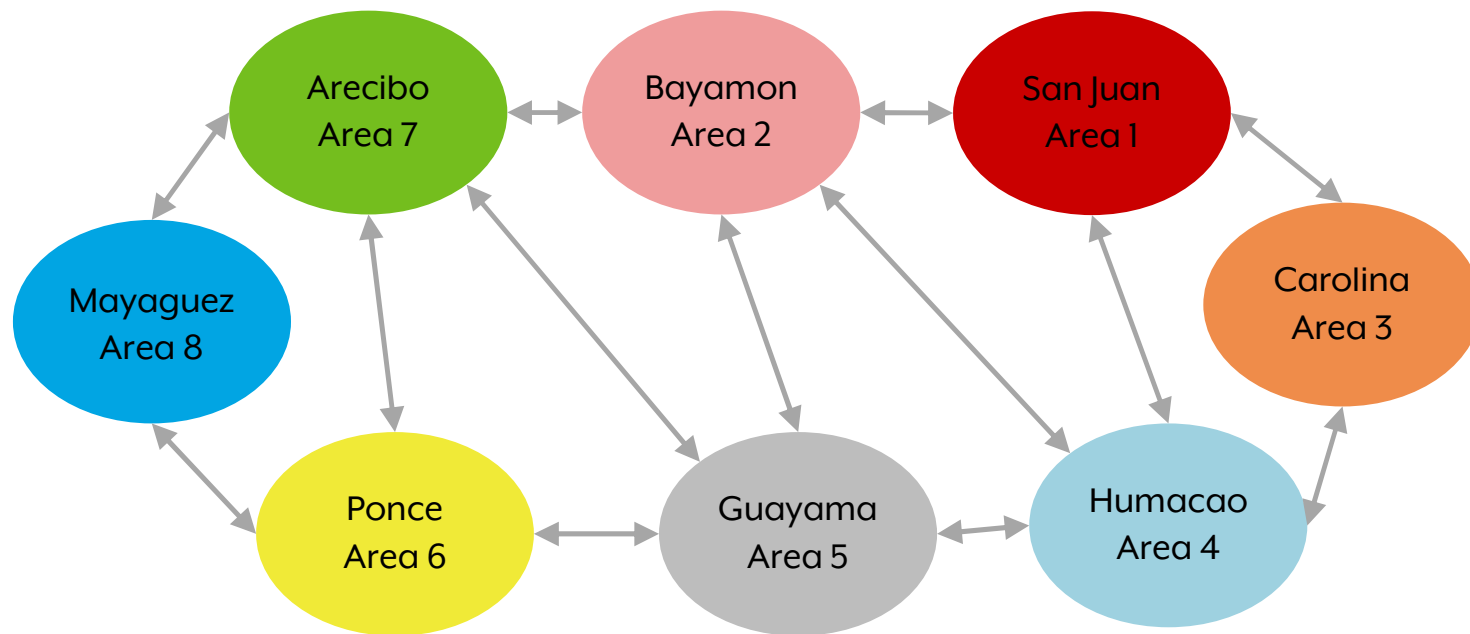
- Define inter-regional, transmission and sub-transmission transfer capability for each inter-regional interface (total of 13 interfaces across 8 regions (districts))



## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

### Baseline Transmission Transfer Capacity

- With the 8 Planning Regions identified below, Transmission Planning is supporting the assessment of IRP scenarios with varied load forecasts, generation integration and operational characteristics

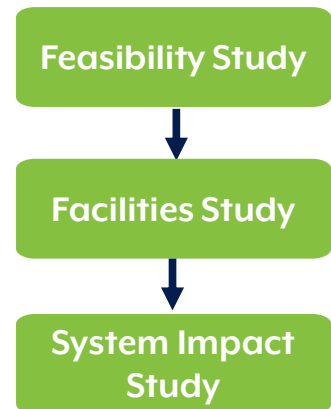


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## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

- LUMA's assessment of the potential interconnection of a new generator includes a series of standard industry analyses.
- The primary phases of LUMA's interconnection analyses include:
  - Feasibility Study – a high-level analysis of facility and system level interconnection requirements and costs
  - Facilities Study – an assessment of the requirements for the generator's point of interconnection with the grid
  - System Impact – an assessment of the generator's impact to the remaining power grid
- Each of these phases is further described in the following slides



## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

### Feasibility Study: Scope and Deliverables

#### Feasibility Study

#### Purpose

Model and assess integration capacity for proposed projects without causing violations in the grid

#### Provide preliminary estimates of interconnection facilities

Necessary equipment required to interconnect the project and required network upgrades to the grid

#### Perform steady-state contingency analysis

LUMA studies the Day peak and Night peak power flow cases using industry standard Transmission Planning software

#### Identify thermal and voltage violations and required network upgrades

Proposed interconnection projects that cause impact to the grid are required to mitigate the impact

#### Perform field verification of proposed point of interconnection

Verify the substation and transmission locations proposed for Point of Interconnection (POIs)

#### Create conceptual single-line diagrams and general arrangement drawings of the POIs

Created specific to each project

#### Prepare high-level cost estimates (AACE Class 5) and schedule for project completion

Developed for both the POI locations and identified Network Upgrades to resolve violations

## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

### Facilities Study: Scope and Deliverables

Facilities Study

#### Purpose

Define the required POI upgrades and network upgrades needed for a safe and reliable interconnection.

#### Identify POI upgrades

Document the physical improvements required to existing stations to connect a proposed project. This includes any and all substation or grid infrastructure.

- **Perform detailed field visit** to each station POI to assess conditions and required upgrades.
- **Create a final POI facilities study report** which includes required scope of work plus preliminary design, materials list, construction cost estimate (AAE level-3 accuracy), and construction schedule.

#### Identify network upgrades

Identify any and all grid infrastructure improvements (outside the POI) required to allow the proposed interconnection to operate at full-rated output.

- **High Level Assessment (HLAs) field visits** for T-lines and stations identified in need for upgrade is performed.
- **Create a final Network Upgrade study report** which includes scope of work, materials list, documentation and cost estimate (AAE level-5 accuracy), and estimated construction schedule.

## 5. Ability of the system to "permit power exchange" with newly interconnecting independent power producers (Cont.)

# System Impact Study: Scope and Deliverables

System Impact Study

### Purpose

Model and analyze the impact of projects to identify network upgrades, any additional new infrastructure needed to alleviate equipment violations, and allocate projects responsibilities.

### Define Cost allocation

Cost allocation for identified network upgrades is developed based on System Impact Study result and individual project contribution to the required network upgrade.

This is achieved by performing Day and Night peak conditions analysis of:

- Thermal and voltage analysis: Detailed analysis under normal and contingency scenarios is performed where all new projects connecting are studied together case to evaluate aggregate impacts to the transmission grid.
- Short-circuit analysis and short-circuit ratio analysis: A short-circuit analysis is conducted to evaluate the impact of the proposed projects on the fault current levels on the grid, and to ensure that circuit breakers and protective devices operate as designed to ensure public safety, equipment safety, grid stability, and reliability.
- Dynamic modeling Minimum Technical Requirements compliance: To check if each proposed facility model complies with the Minimum Technical Requirements (MTRs) specified within the Request For Proposal. This analysis includes project compliance on voltage and frequency regulation and ride-thru, reactive power capabilities, and power factor requirements, among others.

## **6. LUMA waivers for Regulation 9021 about existing or planned transmission facilities, and transmission system analysis**

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## 6. LUMA waivers for Regulation 9021 about existing or planned transmission facilities, and transmission system analysis

- Any waivers LUMA may be aware of at this time, to consider particular requirements of Regulation 9021 as they pertain to sections about existing or planned transmission, and transmission system analysis.

- Potential LUMA waivers

- LUMA may request a partial waiver for sections 2.03 J 1. b) i. B. and 1.e) i.B. which reference voltage variations on distribution circuits that do not comply with the current version of ANSI C 84.1.
  - A partial waiver may be requested because of known data deficiencies from lack of adequate circuit level metering (only one of three phases at the substation) and lack of AMI data to ascertain voltage measurements at customer premise without manual data gathering. Information available will be provided at the time of IRP filing.
- LUMA may request a partial waiver for section 2.03 J 1.d) which references ten years of transmission planning facilities being developed, and all associated project details and descriptions.
  - While LUMA has project plans and details out to ten years, the focus of LUMAs transmission planning efforts to initiate rebuilds and projects is mainly centered on the 5-year horizon, which involves the asset data cleansing, modeling improvements and other industry-standard best practice implementation as discussed in today's Technical Conference
  - Ten-year project plans that are developed will be provided but additional projects and plans will develop as analyses are completed, and the full project list is subject to change.

## 6. LUMA waivers for Regulation 9021 about existing or planned transmission facilities, and transmission system analysis

- Similarly applicable to Section 2.03 J. 1. e) – Distribution Upgrade plans for 10 years
  - LUMA's schedule for executing Distribution Area Plans will extend past the IRP filing deadline.
  - Any distribution projects in the 10-year project plan will be provided, but this list will continue to grow as studies are completed, and the full project list is expected to change.
- These are the waivers that LUMA has identified at this stage of the IRP process on requirements of Regulation 9021 on planned transmission projects and analysis of the Transmission system. Other waivers may be identified and requested as they become known throughout the development of the IRP.

# 7. SETPR Update

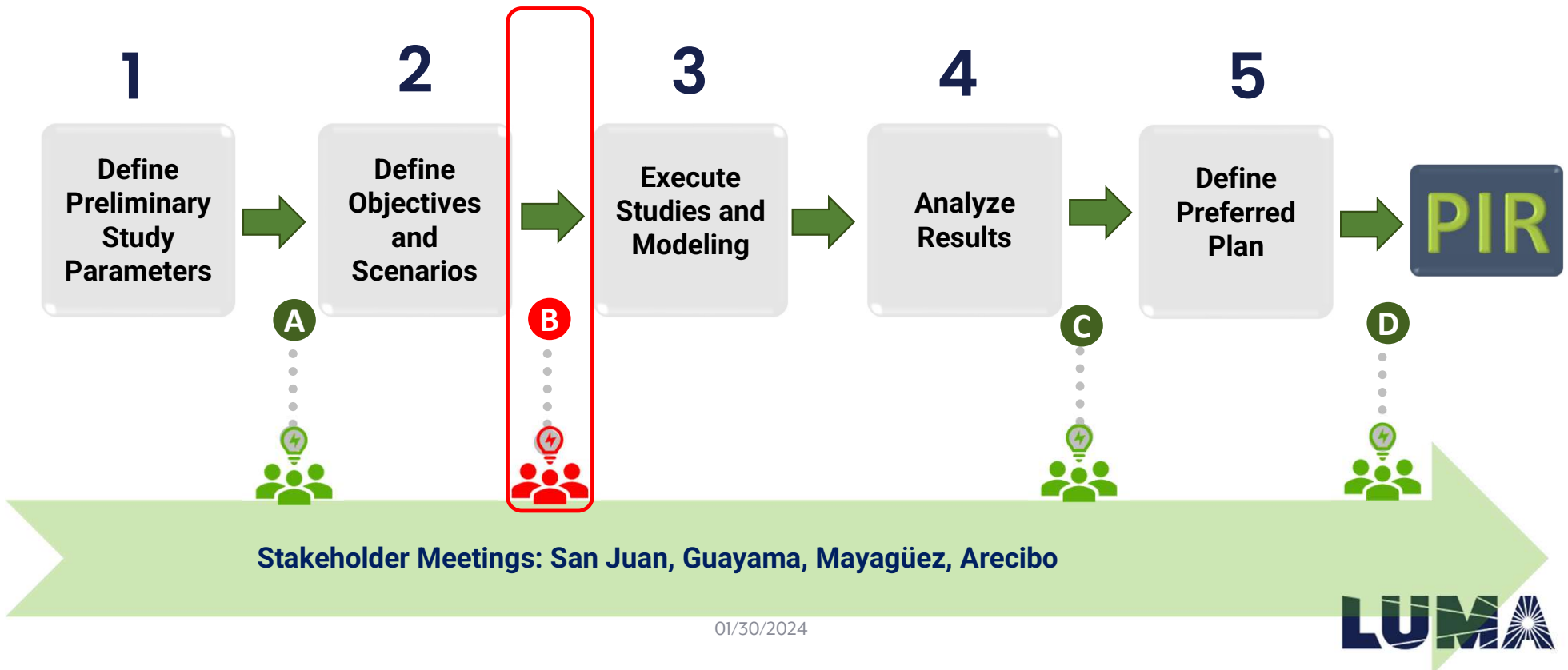
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# 7. SETPR Update

## Prefiling IRP Process



# 7. SETPR Update (Cont.)

## IRP / SETPR Projected Schedule

■ Workshops SETPR Meeting  
 ■ Objectives & Scenarios SETPR Meetings  
 ■ IRP Filing  
 ■ Technical Conference

October 2023							November 2023							December 2023							
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat	
1	2	3	4	5	6	7				1	2	3	4							1	2
8	9	10	11	12	13	14	5	6	7	8	9	10	11	3	4	5	6	7	8	9	
15	16	17	18	19	20	21	12	13	14	15	16	17	18	10	11	12	13	14	15	16	
22	23	24	25	26	27	28	19	20	21	22	23	24	25	17	18	19	20	21	22	23	
29	30	31					26	27	28	29	30	31		24	25	26	27	28	29	30	

January 2024							February 2024						
Sun	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Mon	Tue	Wed	Thu	Fri	Sat
	1	2	3	4	5	6					1	2	3
7	8	9	10	11	12	13	4	5	6	7	8	9	10
14	15	16	17	18	19	20	11	12	13	14	15	16	17
21	22	23	24	25	26	27	18	19	20	21	22	23	24
28	29	30	31				25	26	27	28	29		

### Workshop SETPR Objectives and Scenarios

- 10/10/23 San Juan CAPR (2)
- 10/11/23 San Juan CAPR (1)
- 10/12/23 San Juan CAPR (2)
- 10/18/23 Dorado Iglesia Cristiana Discípulos de Cristo
- 10/19/23 Castañer Esc. Julia Lebrón Soto
- 10/24/23 PRMA- cancelada

- 10/26/23 Humacao CIAPR
- 11/1/23 Guayama CIAPR
- 11/2/23 Ponce CIAPR
- 11/3/23 Arecibo CIAPR
- 11/8/23 San Juan SESAPR
- 11/9/23 Mayagüez CIAPR
- 11/16 y 17 /23 Virtual Workshop

### SETPR Meeting Objectives and Scenarios

- 1/15/2024 Arecibo CIAPR
- 1/16/24 Guayama CIAPR
- 1/17/24 San Juan CIAPR
- 1/18/24 Mayagüez CIAPR
- 2/8/24 Virtual Meeting

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CIAPR - Colegio de Ingenieros y Agrimensores de Puerto Rico  
 CAPR - Colegio de Abogados y Abogadas de Puerto Rico



# 7. SETPR Update (Cont.)

## First Round of Meetings / Workshops

140 Participants / 17 Workshops



# 7. SETPR Update (Cont.)

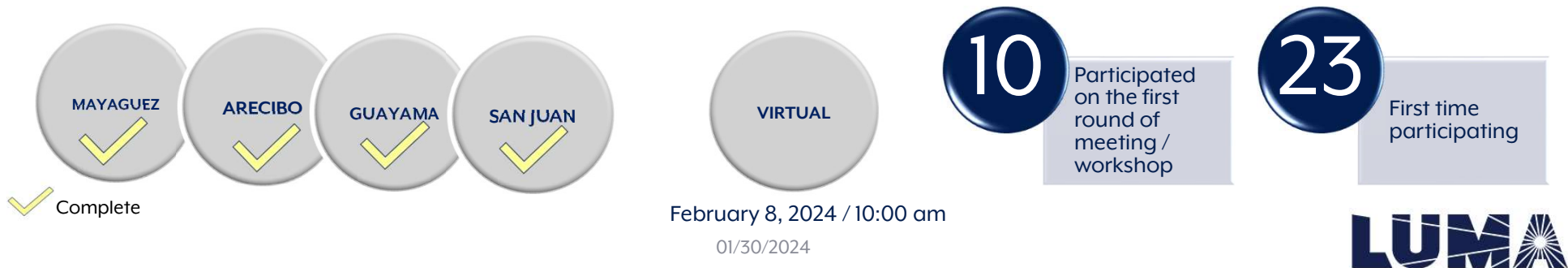


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# 7. SETPR Update (Cont.)

## Second Round of Meetings

33 Participants/ 4 Meetings

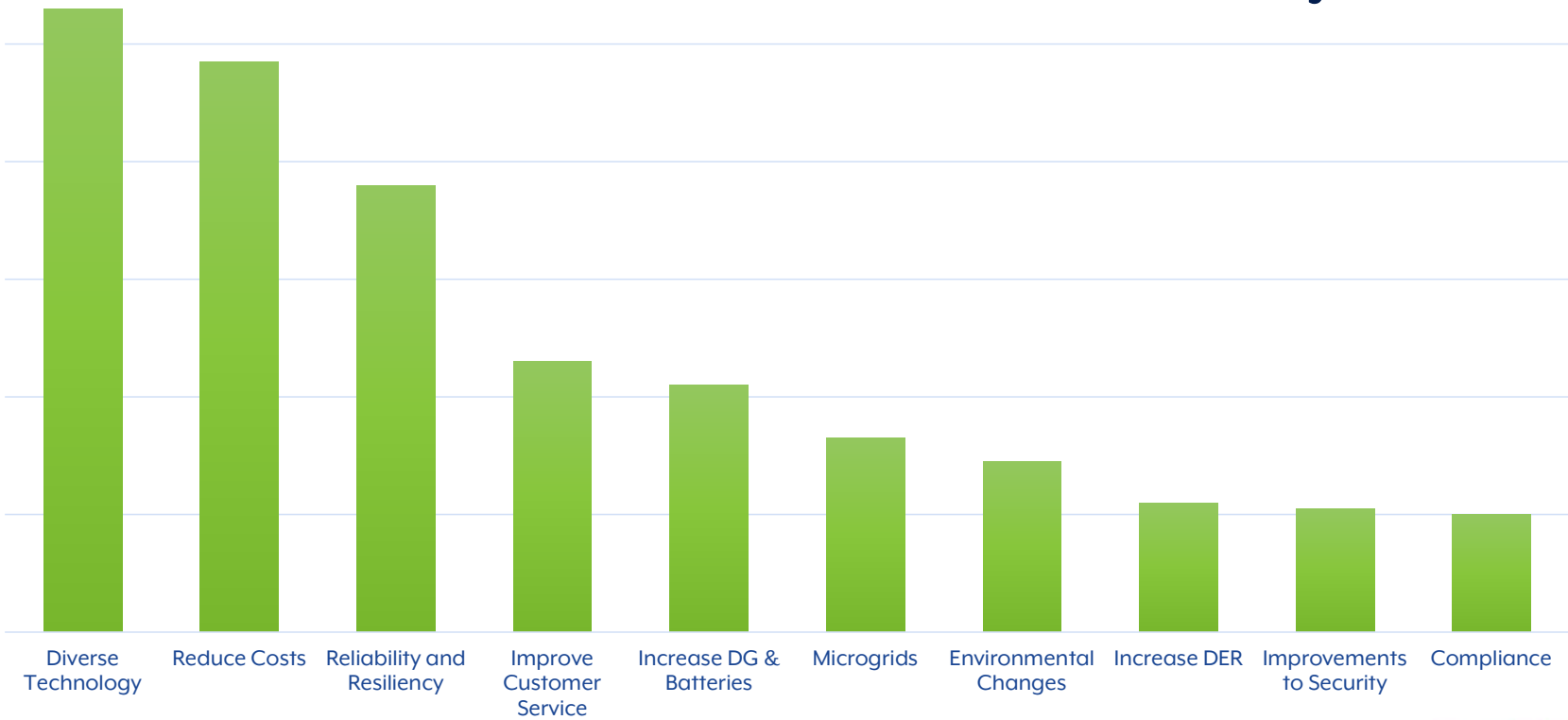


# 7. SETPR Update (Cont.)



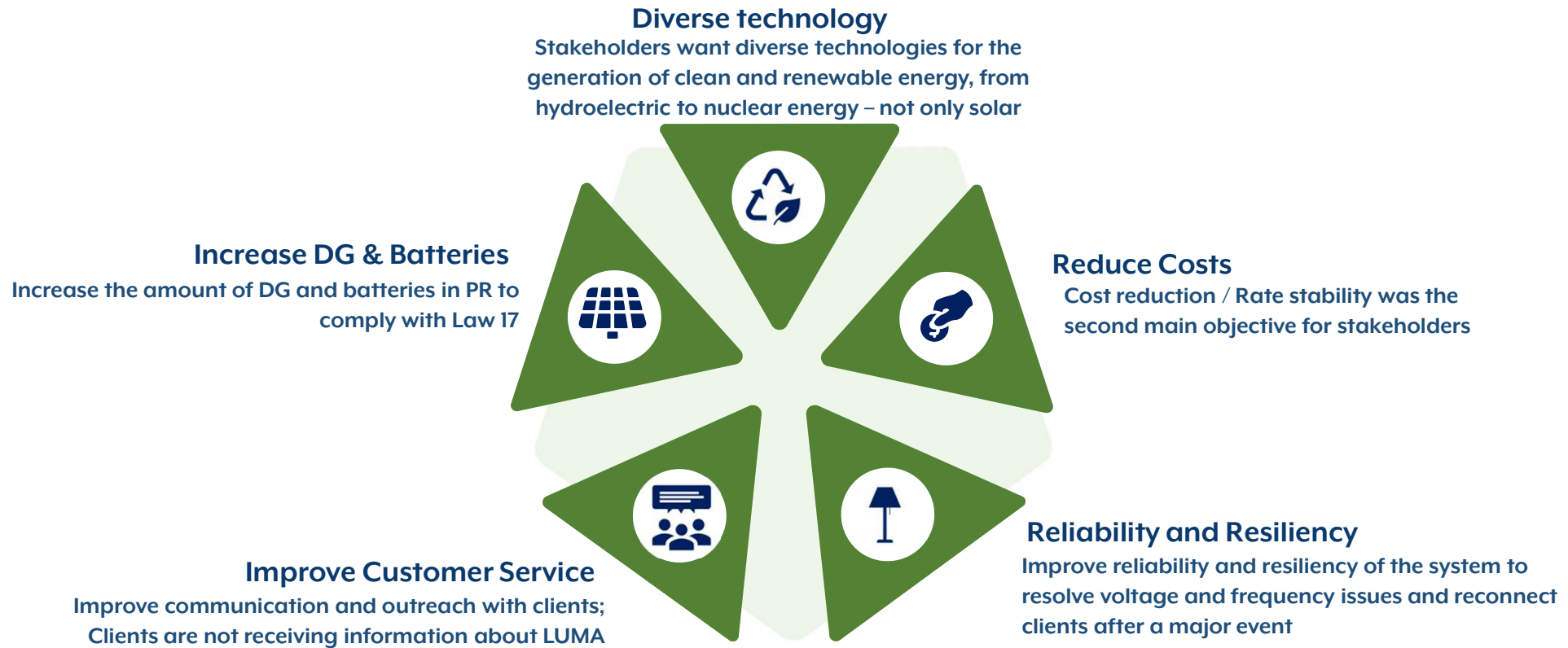
# 7. SETPR Update (Cont.)

## Stakeholder's recommendations for Objectives



# 7. SETPR Update (Cont.)

## Stakeholder's Objectives Recommendations



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## 7. SETPR Update (Cont.)

### Costs

1. Least cost Portfolio
2. Reduce nominal costs of energy supply
3. Reduce and stabilize customer's rate

### Environment

1. Reduce emissions
2. Increase renewable energy
3. Improve the capacity of the system to allow greater penetration of renewables
4. Increase EV's and infrastructure

### Reliability and Resiliency

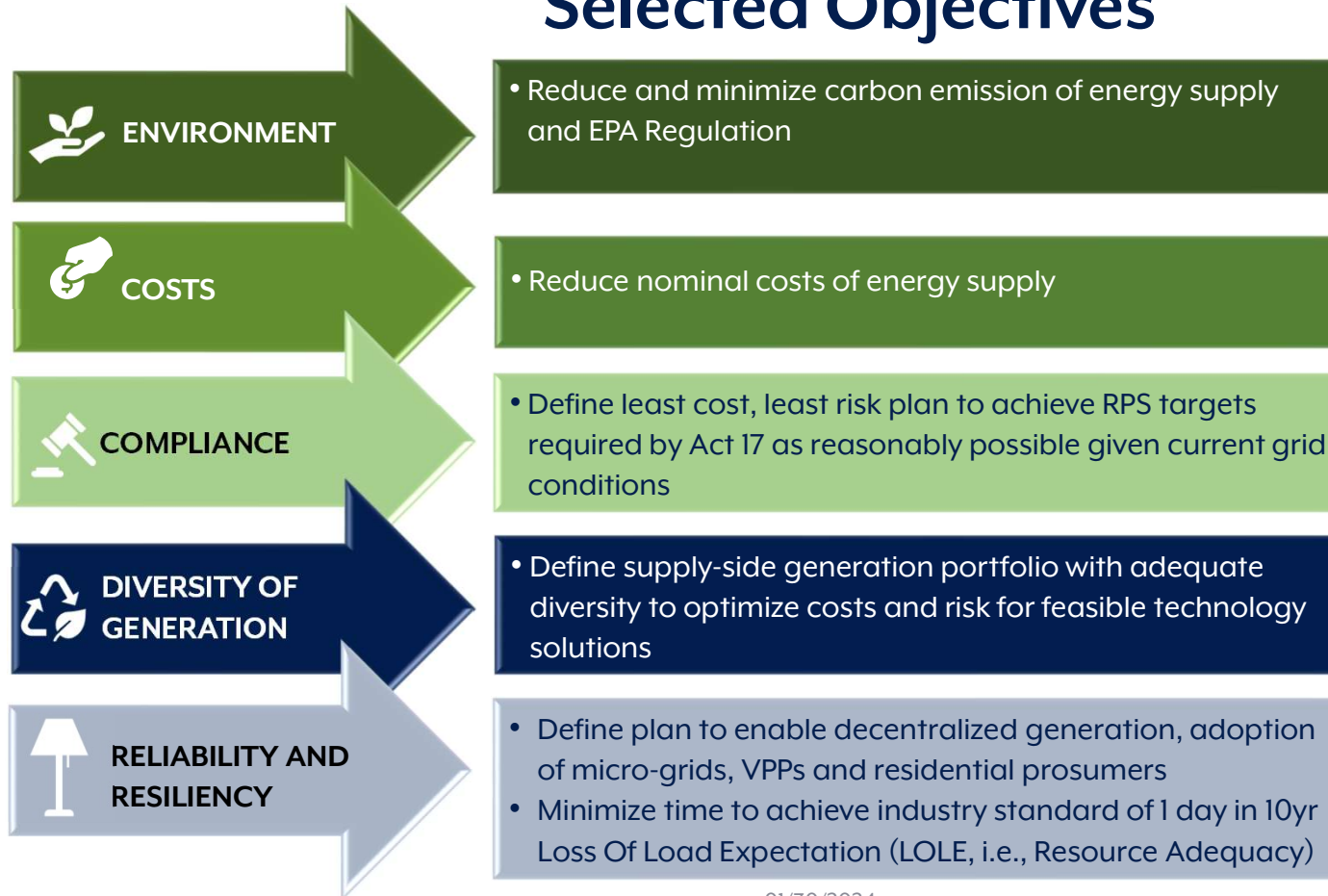
1. Maximize transmission of load served by generation
2. Maximize critical load served by generation
3. Necessary restorations to stabilize the system.
4. Develop new projects to provide reliable service to customers during and after emergencies.

### Distributed Energy Resources

1. Enable distributed energy resources growth
2. Customers without distributed energy should not be impacted

# 7. SETPR Update (Cont.)

## Selected Objectives



### Additional Indicators to be tracked that are not considered objective

- Acres of land used % of energy from DER
- Number of technologies screened

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# 7. SETPR UPDATE (Cont.)

## Scenarios recommended by Stakeholders



# 7. SETPR Update (Cont.)

## Selected Scenarios and Characteristics

#	Scenario Name	Characteristics										
		Load Growth	PV Cost	DER Growth	% Distributed Storage Control	Storage Cost	New Gas Units Allowed	Fossil Fuel Cost	Biodiesel Fuel Cost	EV Growth	EE Forecast	Land Use
	Base Assumptions	Base	Base	Base	0%	Base	Yes	Base	Base	Adjusted PRI00- Base	PRI00- Base	PRI00- More Land
	Plentiful Biodiesel at Cost of Diesel	Base	Base	Base	0%	Base	Yes	Base	Low	Adjusted PRI00- Base	PRI00- Base	PRI00- More Land
	High Distributed Solar and Storage Growth	Base	Base	High	20%	Low	Yes	Base	Base	Original PRI00- High	PRI00- Base	PRI00- More Land
	Accelerated Load Loss	Low	Base	Base	0%	Base	No	High	Base	Adjusted PRI00- Base	PRI00- Base	PRI00- More Land
	Optimistic load growth and costs	High	Low	High	20%	Low	Yes	Low	Base	Original PRI00- High	PRI00- Base	PRI00- More Land
	Less Ag land use	Base	Base	Base	0%	Base	Yes	Base	Base	Adjusted PRI00- Base	PRI00- Base	PRI00-Less Land
	Act 17 EE	Base	Base	Base	0%	Base	Yes	Base	Base	Adjusted PRI00- Base	PRI00 Act 17	PRI00- More Land
	Marine Cable	Base	Base	Base	0%	Base	Yes	Base	Base	Adjusted PRI00- Base	PRI00- Base	PRI00- More Land

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# 7. SETPR Update (Cont.)

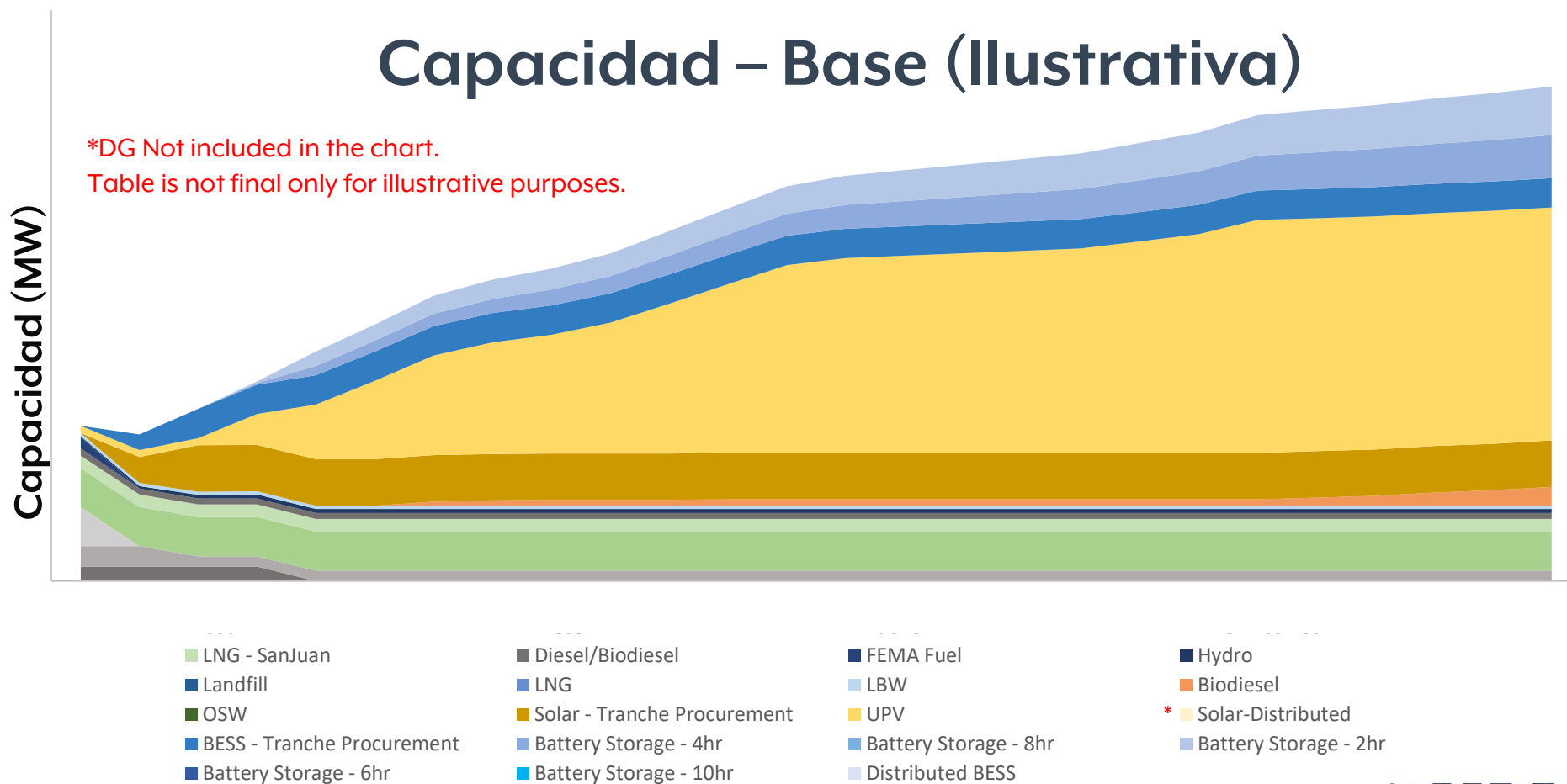
## Sensitivity Runs

#	Category 1	Category 2	Objectives	Sensitivity
1	Environment	Cost	Assess Value of different levels of EE as compared to Scenario 1 results	<ul style="list-style-type: none"> <li>• PVRR with no EE</li> <li>• PVRR with Act 17 EE</li> </ul>
2	Reliability	Cost	Assess projections cost/ benefit of control of distributed Storage	Assess control of 40% and 80% of incremental additions from 2030 and thereafter
3	Environment	Cost	Access cost of portfolios with no RPS	PVRR & LCOE
4	Cost		Assess impact of loss of eligible customers to wheeling	PVRR, and LCOE for loss of 50% and 100% of eligible customers
5	Reliability		Changes to further improve reliability in Vieques, Culebra, and central area of PR Island	Will serve as viable plan to customers in these areas

# 7. SETPR Update (Cont.)

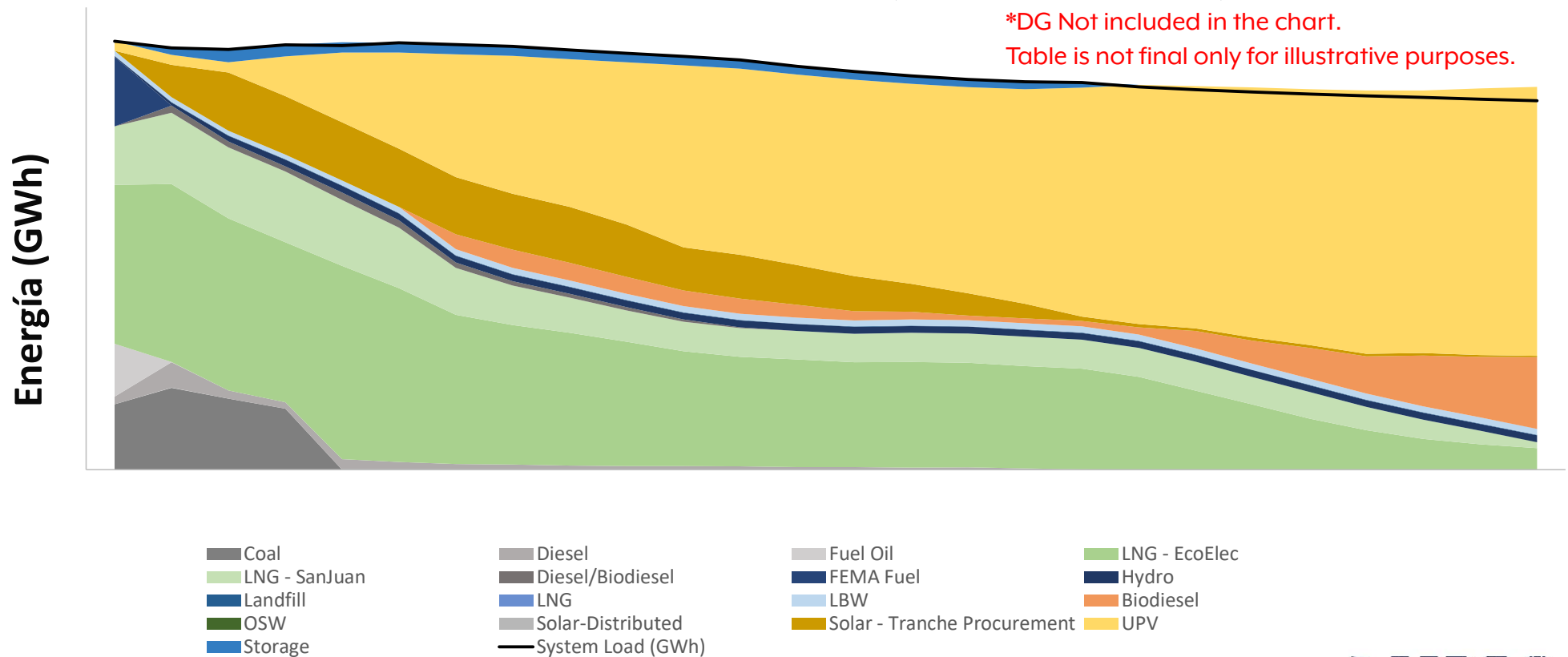
## Capacidad – Base (Ilustrativa)

\*DG Not included in the chart.  
Table is not final only for illustrative purposes.



# 7. SETPR Update (Cont.)

## Generación – Base (Ilustrativa)





Thank You

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