

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

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**IN RE: THE DEPLOYMENT OF
ELECTRIC VEHICLE INFRASTRUCTURE**

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Motion To Update Timeline to Commence
Billing Integrating Interim EV TOU Rate**

**MOTION TO UPDATE TIMELINE TO COMMENCE BILLING INTEGRATING
INTERIM EV TOU RATE**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

I. Relevant Procedural History

1. On January 13, 2023, this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (the “January 13th Resolution and Order”) making several determinations regarding the Draft Phase I Electric Vehicle Plan (“Phase I EV Plan”) filed by LUMA on September 1, 2022¹ and the Revised Draft Electric Vehicle Rate Design Proposal (“Interim EV TOU Rate”) filed by LUMA on July 21, 2022².

2. In the January 13th Resolution and Order the Energy Bureau approved the Interim EV TOU Rate (with some modifications), ordered LUMA to file a revised Phase I EV Plan by April 30, 2023, and, in what is pertinent to this motion, ordered LUMA to: finish development of and launch the Interim EV TOU Rate by September 30, 2023; submit by February 10, 2023 a

¹ See LUMA’s *Motion Submitting Draft Phase I EV Plan and Request to Postpone Compliance Technical Hearing No. 3 and Concomitant Deadline to Submit Revised Phase I EV Plan* filed on September 1, 2022 and LUMA’s *Motion Re-Submitting Exhibit 1 Filed on September 1, 2022 with Technical Repairs and Requesting Substitution of Original Exhibit* filed on September 2, 2022.

² See LUMA’s *Motion Submitting Revised EV Rate Design Proposal* filed July 21, 2022.

Project Schedule for implementation of the Interim EV TOU Rate (the “Project Schedule”); and report every thirty (30) days on the progress with the data collection and billing to integrate the Interim EV TOU Rate (“Billing Integration Reports”). *See* January 13th Order on pages 9, 10, 11 and 14.

3. On February 14, 2023, the Energy Bureau issued a Resolution and Order extending the deadline to file the Project Schedule until February 17, 2023 and ordering LUMA to commence presenting the monthly Billing Integration Reports on March 13, 2023, among others.

4. On February 17, 2023, LUMA submitted to the Energy Bureau the Project Schedule. *See Motion Submitting Project Schedule in Compliance with Resolution and Order of January 13, 2023 and Requesting Modification of Certain Deadlines Thereunder* of that date (“February 17th Motion”) and its Exhibit 1. LUMA indicated that the activities in the Project Schedule would be affected by a series of variables, including, among others, existing billing and IT systems uncertainties and limitations and potential procurement hurdles or delays and that changes to the Project Schedule could be needed as activities progressed. *See* February 13th Motion at page 5. LUMA requested the extension of certain deadlines, including the deadline to begin the billing integrating the Interim EV TOU Rate proposed for the end of November 2023 or sixty (60) days following the date when customer enrollment has reached a minimum threshold number of customers, whichever occurs later. *See id.* at pages 5 to 9.

5. On March 13, 2023, LUMA informed in its Billing Integration Report that it had conducted initial vendor conversations to understand the market and structure to inform the development of a request for proposals for the third-party telematics vendor. *See Motion to Submit Billing Integration Report and Request to Modify Reporting Frequency*, Exhibit 1, page 5.

6. On March 29, 2023, the Energy Bureau issued a Resolution and Order (“March 29th Resolution and Order”) approving the Project Schedule and modifying, among others, the deadline for commencing billing integrating the Interim EV TOU Rate to November 30, 2023 or sixty (60) days following the date when customer enrollment has reached a minimum threshold number of customers, whichever occurs later³. *See id.* on page 3.

7. On April 12, 2023, LUMA informed in its Billing Integration Report that it had finalized a Request for Quotations (“RFQ”) scope document for the third-party telematics vendor and published it. *See Motion to Submit April 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

8. On May 1, 2023, LUMA submitted to the Energy Bureau the Final Phase I EV Plan in the form of a document titled Puerto Rico’s Electric Vehicle Adoption Plan (“PR-EVAP”). *See Motion to Submit Final Phase I EV Plan in Compliance with Resolution and Order of January 13, 2023* filed on that date.

9. On June 12, 2023, LUMA informed in its Billing Integration Report that due to a low response rate it would re-issue the RFQ for the third-party telematics vendor. *See Motion to Submit June 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

10. On July 11, 2023, LUMA informed in its Billing Integration Report that it had re-issued the RFQ for third-party telematics vendors. *See Motion to Submit July 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

³ This latter option would apply if LUMA submitted justification for the threshold level and explained the need for it.

11. On September 11, 2023, LUMA informed in its Billing Integration Report that: the third-party telematics vendor had been selected; LUMA was in the process of contracting and onboarding such vendor; and the billing system integration process was estimated to be from 3-6 months “depending on testing and validation with vendor.” *See Motion to Submit September 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

12. On October 10, 2023, LUMA informed in its Billing Integration Report that: the contract with the third-party telematics vendor had been signed; LUMA was in the onboarding phase of the procurement process with this vendor; the billing system integration process was estimated to be from 3-6 months “depending on testing and validation with the vendor”; and the launch of the production process was estimated to be February 2024. *See Motion to Submit October 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

13. On November 8, 2023, LUMA informed in its Billing Integration Report that: LUMA had completed onboarding of the third-party telematics vendor; the finalization of the technical requirements for Oracle CC&B was underway (but off schedule); and the process of building and testing the Oracle CC&B to receive the EV TOU data and the launch of the production process were anticipated to occur in January and February 2024, respectfully. *See Motion to Submit November 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

14. On November 30, 2023, LUMA informed that: the third-party telematics vendor onboarding was completed in October 2023; LUMA was working with this vendor on testing and validation; LUMA had estimated that once the third-party telematics vendor was onboarded, the

process for integration was estimated to take from 3-6 months depending on the testing and validation conducted with the vendor; and LUMA estimated that this process would be completed at the earliest in January 2024 but could take until April 2024, given the uncertainties in implementing an innovative methodology and the uncertainties and limitations associated with the existing billing system. *See Motion Informing Status of Billing Integrating Interim EV TOU Rate and Request for Extension of Time to Complete Such Milestone* filed on November 30, 2023 (“November 30th Motion”) on page 8. LUMA then requested that this Energy Bureau extend the deadline for commencement of the billing integrating the Interim EV TOU Rate until April 2024. *See id.*

15. On December 8, 2023, LUMA informed in its Billing Integration Report that “[u]ncertainties on implementing an innovative methodology have extended the implementation of the EV TOU Rate through April”. *See Motion to Submit December 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* of that date, Exhibit 1 on page 2.

16. On December 20, 2023, the Energy Bureau issued a Resolution and Order (“December 20th Resolution and Order”) in which it indicated that it had reviewed the Billing Integration Reports and the material presented by LUMA in its November 30th Motion and found that “LUMA has improved progress towards implementing the Interim EV TOU Rate, kept the Energy Bureau informed of issues related to the acquisition of the third-party telematics vendor, and took the steps to address those issues and onboard a vendor”. *See* December 20th Resolution and Order on page 3. However, the Energy Bureau indicated that it “believe[ed] implementing the EV TOU rate remain[ed] a priority” and would “set the deadline based on the 3-month estimate for testing and validation of the billing system”. *See id.* The Energy Bureau then “grant[ed]

LUMA's request to extend the deadline for commencement of the billing integrating the Interim TOU Rate until February 1, 2024". *See id.*

17. On January 8, 2024, LUMA informed in its Billing Integration Report that "[billing] system integration efforts continue with the 3rd party telematics vendor" and LUMA has continued to "work through IT/Cybersecurity protocols to ensure proper design and permissions to mitigate potential implementation challenges". *See Motion to Submit January 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* filed on January 8, 2023, Exhibit 1 on page 2. LUMA further informed that the estimated dates for the building and testing of the Oracle CC&B process to receive the EV TOU data and the launch of the production processes and monitoring of steps were March and April 2023, respectively. *See id.* LUMA explained that among the risks hindering key milestones were: "[u]ncertainties in implementing an innovative methodology [which] will require additional time for appropriate design and testing"; "[l]imitations associated with [the] existing billing system [which] require non-standard technical requirements and solutions to reach [the] desired end product"; "[t]echnical questions are being addressed with the 3rd party telematics vendor" and "[t]esting and validation are yet to commence"; and "[i]ntegration of the Interim EV TOU Rate is expected to commence within the 6-month timeframe estimated in the previous EV TOU Billing Integration Reports". *See id.* LUMA also indicated that "[f]ollowing a thorough evaluation, LUMA and the vendor have established a 6-month integration timeline" and LUMA would be "submitting a request to the Energy Bureau to clarify this timeline". *See id.*

II. Update on Timeline to Commence Billing Integrating Interim EV TOU Rate

18. As LUMA informed in the Billing Integration Reports that have been filed with this Energy Bureau, LUMA had forecasted that, once the third-party telematics vendor was onboarded,

the process for integrating the Interim EV TOU Rate in the LUMA billing system would take about 3-6 months, depending on the testing and validation to be conducted by the vendor. LUMA also explained that this timeline was contingent on LUMA and the vendor's assessment of the system, the uncertainties in implementing an innovative methodology and the limitations associated with the existing billing system. As has been informed to this Energy Bureau, the vendor onboarding was completed in October 2023. After further examination and evaluation between LUMA and the selected vendor, it was concluded that the earliest time when the full billing integration can be properly achieved would be a date closer to the 6-month mark within the 3-to-6-month range after October 2023, as was anticipated for this task and informed to the Energy Bureau in the Billing Integration Reports.

19. Considering all of the relevant factors that will enable a seamless integration of the Interim EV TOU Rate, it is not operationally feasible to complete integration by February 1, 2024. It is anticipated that the process to integrate the Interim EV TOU Rate fully and properly into the billing system and commence billing at this rate will be completed by April 30, 2024—within the estimated range previously provided by LUMA—.

20. The role of the third-party telematics vendor is to send aggregated vehicle data to LUMA through secure transmission protocols. The aggregated TOU consumption data will be used by the CC&B System to generate the detail for charges on customer bills. This methodology is innovative and will be implemented in Puerto Rico for the first time, making this step one to take with much caution and study, particularly given the state of the billing system which is still under remediation.

21. Furthermore, following the onboarding of the third-party telematics vendor and commencement of their work, it was concluded that supplementary design efforts are required to

guarantee a seamless integration of the CC&B System with the proposed new technology of the telematics vendor, specifically to incorporate TOU data into the CC&B system. Steps required to ensure a positive customer experience and deployment include analyzing requirements, designing the process, preparing a functional design, building the solution, preparing test cases, carrying out integration testing, preparing training materials, user acceptance testing, deployment preparation and finally, deployment. Additionally, enhancing cybersecurity measures and protocols to ensure proper design is a crucial priority.

22. LUMA, as Operator of the Transmissions and Distribution system (“T&D system”), continues to be committed to carrying out expeditiously and responsibly, the required processes efficiently and informing the Energy Bureau of new developments in the path towards integration of the EV TOU Rate.

WHEREFORE, LUMA respectfully informs that the Energy Bureau **take notice** of the aforementioned timeline for commencement of the billing integrating the Interim TOU Rate by April 30, 2024.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 1st day of February 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 the attorney for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; lionel.santa@prepa.pr.gov; 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; apietrantoni@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;

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