

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

**NEPR**

**Received:**

**Feb 15, 2024**

**9:50 PM**

**IN RE:**

Review of the Puerto Rico Electric Power  
Authority Integrated Resource Plan

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

**SUBJECT: Submission in Compliance with Bench Order  
issued in Third Pre-Filing Technical Conference and  
Request for Confidential Treatment**

**MOTION SUBMITTING INFORMATION REQUESTED THROUGH BENCH ORDER  
ISSUED IN THE THIRD PRE-FILING TECHNICAL CONFERENCE AND REQUEST  
FOR CONFIDENTIAL TREATMENT**

**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:

**I. Introduction**

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<sup>1</sup> and answered questions by the Energy Bureau and Energy Bureau consultants.

5. During the Third Pre-Filing Technical Conference, this Energy Bureau issued bench orders requesting additional information from LUMA. One of said bench orders required LUMA to submit on or before February 15, 2024, the following information:

- a. High-resolution maps of the transmission system of the Puerto Rico Electric Power Authority;
- b. A snapshot of the condition of the transmission system with a list of 115 kV and 230 kV transmission lines and their availabilities; and
- c. Preliminary estimated power transfer capacity between each transmission planning area that will be used in PLEXOS® modeling for the 2024 Integrated Resource Plan ("IRP").

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<sup>1</sup> LUMA filed revised presentation materials on February 1, 2024. *See Motion Submitting Amended Presentation for Third In-Person Prefiling Technical Conference.*

## II. Submission of Information in Response to Bench Order

6. In compliance with the aforementioned bench order issued during the Third Pre-Filing Technical Conference, LUMA hereby submits with *Exhibits 1-7* of this Motion the following:

- a. Five (5) high resolution maps of the transmission system of the Puerto Rico Electric Power Authority, including the 38 kV, 115 kV and 230 kV, transmission lines. Four (4) of the maps are submitted publicly, *see Exhibits 1 through 4*, and one (1) map, which contains critical information of the transmission system, is submitted under seal of confidentiality, *see Exhibit 5*;
- b. Information to provide a snapshot of the condition of the Transmission System which includes a list of 115 kV and 230 kV transmission lines, *see Exhibit 6*. The information on location and current availabilities is submitted under seal of confidentiality; and
- c. Preliminary estimated power transfer capacity between each transmission planning area to be used in PLEXOS® for the 2024 IRP, *see Exhibit 7*.

7. LUMA is submitting *Exhibit 5*, a map of the transmission system, fully under seal of confidentiality. Furthermore, LUMA is filing a partially redacted copy of *Exhibit 6* protecting from disclosure details on the location and availabilities of the transmission lines that are identified therein. This, to protect Critical Energy Infrastructure Information (“CEII”), *see, e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. §388.113 (2020), and pursuant to the Energy Bureau’s Policy on Management of Confidential Information. *See* Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.

### **III. Memorandum of Law in Support of Request for Confidentiality**

#### **A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau**

8. The bedrock provision on the management of confidential information filed before this Energy Bureau, is Section 6.15 of Act 57-2014, known as the “Puerto Rico Energy Transformation and Relief Act.” It provides, in pertinent part, that: “[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such [...]” 22 LPRA §1054n. If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.* §1054n(a).

9. Access to confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.* §1054n(b). Finally, Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review.” *Id.* §1054n(c).

10. Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico.

11. Moreover, the Energy Bureau's Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ¶ 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* at ¶ 6.

12. The Energy Bureau's Policy on Management of Confidential Information states the following with regard to access to validated Trade Secret Information and CEII:

1. Trade Secret Information  
Any document designated by the [Energy Bureau] as Validated Confidential Information because it is a trade secret under Act 80-2011 may only be accessed by the Producing Party and the [Energy Bureau], unless otherwise set forth by the [Energy Bureau] or any competent court.
2. Critical Energy Infrastructure Information ("CEII")  
The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties' authorized representatives only after they have executed and delivered the Nondisclosure Agreement.

Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

*Id.* at § D (on Access to Validated Confidential Information).

13. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that “a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed according to [...] Article 6.15 of Act No. 57-2015, as amended.” *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms*, § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

#### **B. Request for Confidentiality**

14. The Transmission System Map, *Exhibit 5*, and the portions of the snapshot of the condition of the Transmission System that include the location of the transmission lines along with their availabilities, *Exhibit 6*, contain CEII that, under relevant federal law and regulations, is protected from public disclosure. *Exhibit 5* and the redacted portions of *Exhibit 6* warrant confidential treatment to protect critical infrastructure of the Transmission System, from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico.

15. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII under seal of confidentiality.<sup>2</sup> In at least two Data Security and Physical Security proceedings,<sup>3</sup> this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure. Additionally, this Energy Bureau has granted requests by LUMA to protect CEII in connection with LUMA's System Operation Principles. *See* Resolution and Order of May 3, 2021, table 2 on page 4, Case No. NEPR-MI-2021-0001 (granting protection to CEII included in LUMA's Responses to Requests for Information). Similarly, in the proceedings on LUMA's proposed Initial Budgets and System Remediation Plan, this Energy Bureau granted confidential designation to several portions of LUMA's Initial Budgets and Responses to Requests for Information. *See* Resolution and Order of April 22, 2021, on Initial Budgets, Table 2 on pages 3-4, and Resolution and Order of April 22, 2021, on Responses to Requests for Information, table 2 on pages 8-10, Case No. NEPR-MI-2021-0004; Resolution and Order of April 23, 2021, on Confidential Designation of Portions of LUMA's System Remediation Plan, table 2 on page 5, and Resolution and Order of May 6, 2021, on Confidential Designation of Portions of LUMA's Responses to Requests for Information on System Remediation Plan, table 2 at pages 7-9, Case No. NEPR-MI-2020-0019.

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<sup>2</sup> *See e.g., In re Review of LUMA's System Operation Principles*, NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority's System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA's Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan*, NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrid Transmission and Distribution Investments*, NEPR-MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII. However, *see* Resolution and Order of February 12, 2021, reversing in part, grant of confidential designation).

<sup>3</sup> *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

16. Similarly, the Energy Bureau has granted LUMA's requests for confidential treatment of portions of Scopes of Work ("SOWs") submitted for approval in Case No. NEPR-MI-2021-0002. Notably, the Energy Bureau designated portions of SOWs as confidential CEII in its Resolution and Order of February 22, 2023, *see* Table 1 on page 3, Resolution and Order of April 5, 2023, *see* Table 1 on page 4, and Resolution and Order of May 5, 2023, *see* table 1 at page 3, and Resolution and Order of August 30, 2023, *see* table 1 at page 3. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

17. As mentioned above, the Energy Bureau's Policy on Management of Confidential Information provides for the management of CEII. It directs that the parties' authorized representatives access information validated as CEII only after executing and delivering a Non-Disclosure Agreement.

18. CEII or critical infrastructure information is generally exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
- (iv) Does not simply give the general location of the critical infrastructure. *Id.*

19. Additionally, "[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively



affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, “[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.” *Id.*

20. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”).<sup>4</sup> CII is defined as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems [...]” 6 U.S.C. § 671 (3).<sup>5</sup>

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<sup>4</sup> Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

- (A) shall be exempt from disclosure under the Freedom of Information Act;
- (B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision-making official; shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
- (C) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
  - (i) in furtherance of an investigation or the prosecution of a criminal act; or
  - (ii) when disclosure of the information would be--
    - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
    - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office
- (D) shall not, be provided to a State or local government or government agency; of information or records;
  - (i) be made available pursuant to any State or local law requiring disclosure of information or records;
  - (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or
  - (iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.
- (F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

<sup>5</sup> CII includes the following types of information:

21. The Transmission System Map submitted in *Exhibit 5* identifies transmission centers and their locations, as well as the locations of substations, plants, generators, and switchyards. Those are critical infrastructures that are identified in the map with sufficient specificity as to render them vulnerable if the map is disclosed publicly or made publicly available. Furthermore, those portions of the snapshot of the condition of the Transmission System that include the location and current availabilities of transmission lines *Exhibit 6*, also garner protection as CEII because the transmissions lines are critical infrastructures and the details of where they are located and their availabilities, are essential to the safe and reliable operations of the transmission system. The details of these critical infrastructures that include specific locations, could potentially be helpful to a person planning an attack on the energy facilities shown as part of this submission. The information identified as confidential in *Exhibits 5 and 6* is not common knowledge and is not made publicly available by LUMA. Therefore, it is respectfully submitted that, on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of *Exhibits 5 and 6* from disclosure, given the nature and scope of the details included in those documents.

22. LUMA respectfully submits that the Transmission System Map, *Exhibit 5*, and the portions of the snapshot of the condition of the Transmission System with the locations and availabilities of transmission lines, *Exhibit 6*, should be designated as CEII. This designation is a

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(A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;

(B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or

(C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

reasonable and necessary measure to protect the specific location of the facilities listed or identified in *Exhibits 5 and 6*. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that these materials constitute CEII that should be maintained confidentially to safeguard their integrity and protect them from external threats.

### **C. Identification of Confidential Information**

23. In compliance with the Energy Bureau’s Policy on Management of Confidential Information (CEPR-MI-2016-0009) below, find a table summarizing the portions of the Transmission System Map for which we present this request for confidential treatment.

<b>Document</b>	<b>Name</b>	<b>Pages in which Confidential Information is Found, if applicable</b>	<b>Summary of Legal Basis for Confidentiality Protection, if applicable</b>	<b>Date Filed</b>
Exhibit 5	LUMA Energy Transmission System	Entire Document	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	February 15, 2024
Exhibit 6	Snapshot of 115 kV and 230 kV	Columns on location and availability.	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	February 15, 2024

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take note** of the aforementioned; **deem** LUMA in compliance with the bench orders issued during the Third Pre-

Filing Technical Conference; **grant** LUMA's request for confidential treatment stated herein; and **issue** any orders that this Energy Bureau deems proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico on February 15, 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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*Exhibits 1 Through 4*



# Exhibit 1

## LUMA Transmission Lines 38kV

NEPR-AP-2023-0004

February 15, 2024

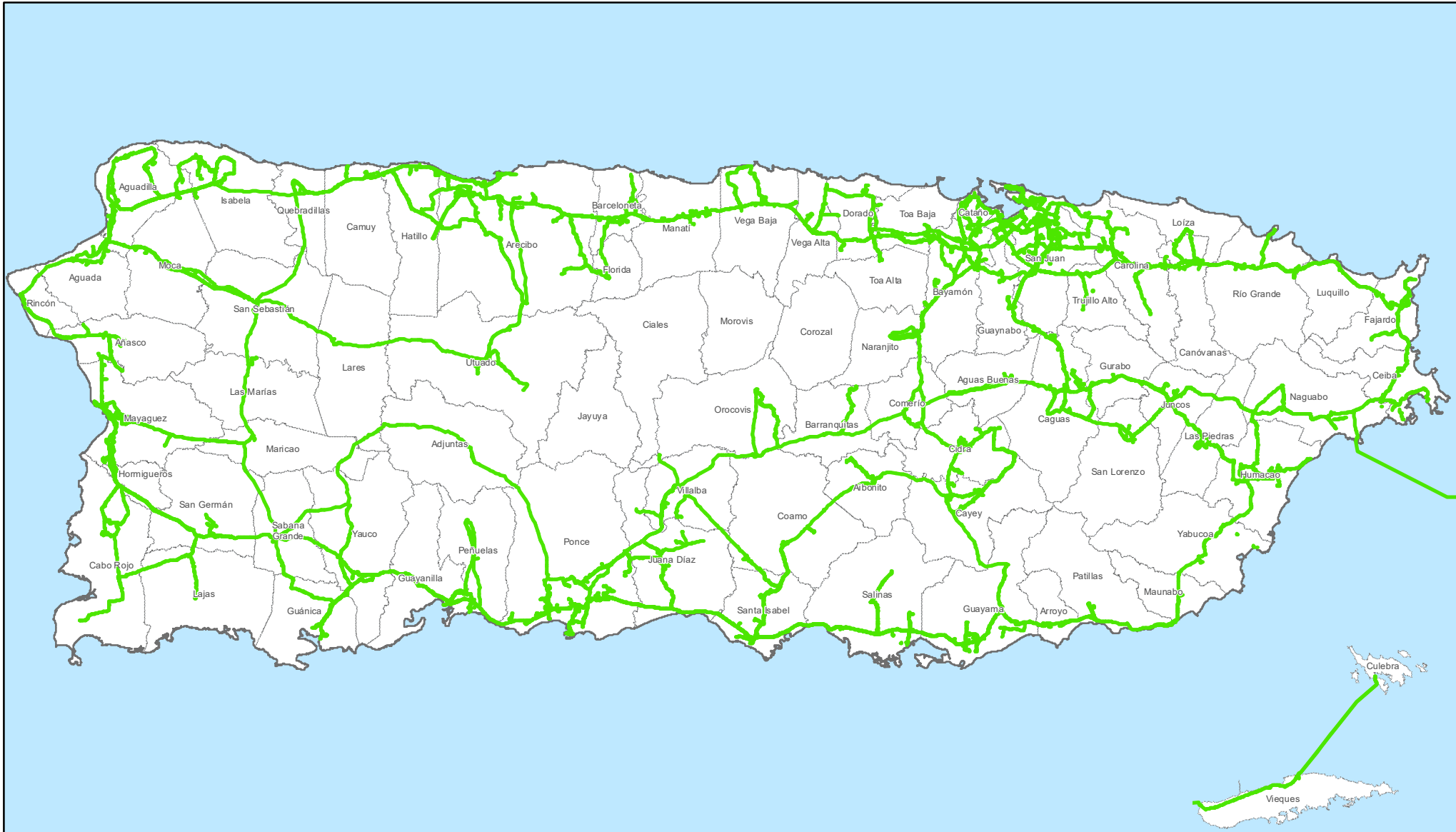


# LUMA Transmission Lines

## 38kV

0 5 10 20 Kilometers

1:665,000



— 38kV Transmission Lines



# Exhibit 2

## LUMA Transmission Lines 115kV

NEPR-AP-2023-0004

February 15, 2024





# LUMA Transmission Lines 115kV

0 5 10 20 Kilometers

1:665,000



— Transmission Lines 115kV



# **Exhibit 3**

**LUMA Transmission Lines 230kV**

**NEPR-AP-2023-0004**

**February 15, 2024**





# Exhibit 4

## All LUMA Transmission Lines

NEPR-AP-2023-0004

February 15, 2024



# LUMA Transmission Lines

0 5 10 20 Kilometers

1:665,000



*Exhibit 5*



# **Exhibit 5- CONFIDENTIAL**

**LUMA Energy Transmission System**

**NEPR-AP-2023-0004**

**February 15, 2024**





*Exhibit 6*



# **Exhibit 6- CONFIDENTIAL**

## **Snapshot of the transmission system**

**NEPR-AP-2023-0004**

**February 15, 2024**

#	Line Number	Voltage (kV)	Location	Availability
1	36100	115		
2	36200	115		
3	36300	115		
4	36400	115		
5	36500	115		
6	36600	115		
7	36700	115		
8	36800	115		
9	36900	115		
10	37000	115		
11	37100	115		
12	37200	115		
13	37400	115		
14	37500	115		
15	37600	115		
16	37700	115		
17	37800	115		
18	37900	115		
19	38000	115		
20	38100	115		
21	38200	115		
22	38300	115		
23	38400	115		
24	38500	115		
25	38600	115		
26	38700	115		
27	38800	115		
28	38900	115		
29	39000	115		
30	39100	115		
31	39300	115		
32	39600	115		
33	39800	115		
34	39900	115		
35	40100	115		
36	40200	115		
37	40300	115		
38	40400	115		
39	40600	115		
40	40700	115		
41	40800	115		
42	41000	115		
43	41200	115		
44	41300	115		
45	41400	115		
46	41500	115		

#	Line Number	Voltage (kV)	Location	Availability
1	50100	230		
2	50200	230		
3	50300	230		
4	50400	230		
5	50500	230		
6	50700	230		
7	50800	230		
8	50900	230		
9	51000	230		
10	51100	230		
11	51200	230		
12	51300	230		

*Exhibit 7*



# **Exhibit 7**

## **PREB Transmission Transfer Capability**

**NEPR-AP-2023-0004**

**February 15, 2024**

# Preliminary Estimate of Puerto Rico Transmission Transfer Capability

## Eight Transmission Planning Areas

LUMA uses eight Transmission Planning Areas (TPAs) following the legacy model of the transmission system in PSS®E study software. Since transmission systems do not generally follow geographic or municipal boundaries, defining exact geographic areas served by specific transmission system elements is difficult. Therefore, Figure 1 illustrates the eight TPAs for which the boundaries provide a high-level depiction of approximate geographic areas served by the transmission system elements. The TPAs will be modeled as separate regions in the Integrated Resource Plan (IRP) resource modeling performed in PLEXOS®.

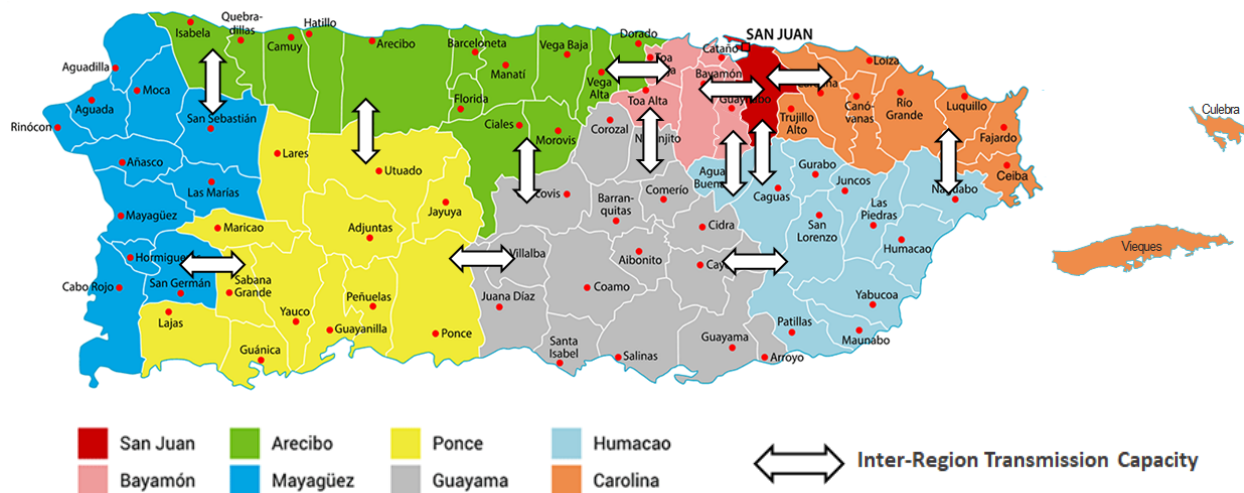


Figure 1 - Map of Transmission Planning Areas

## Transmission Modeling in PLEXOS® and PSS®E

The transmission system is modeled in PLEXOS® and PSS®E as a representation of loads, generation sources, and transmission system connections including transmission lines within each TPA and between TPAs or ties. In PLEXOS®, the transmission system will be represented as a total of 13 ties connecting the eight TPAs, see Figure 2 below.

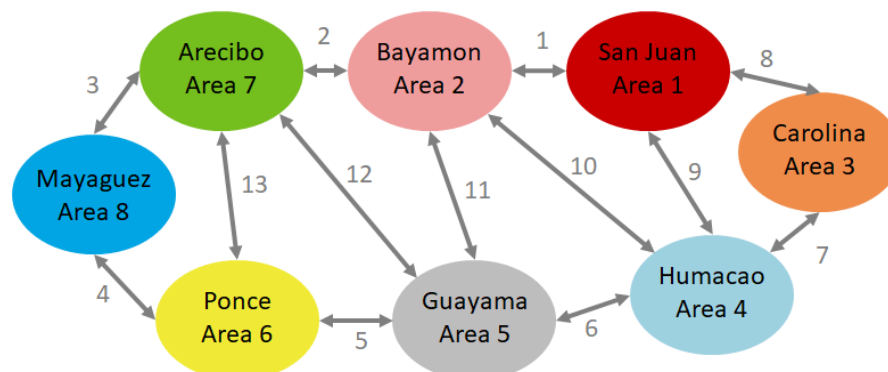


Figure 2 - Transmission Planning Area Representation in Models

## Base Case Transmission Transfer Capacity

A PSS®E model of the Puerto Rico transmission system was used to estimate the transfer capacity for each tie or combination of ties connecting the TPAs. Table 1 below includes the preliminary estimated power transfer capacity between each TPA that results from the transfer capacity modeling.

*Table 1 - Summary of Estimate Transfer Capacity Between TPAs*

Tie#	TPA A	TPA B	Capacity MW [A to B]	Capacity MW [B to A]
1	San Juan	Bayamon	818*	773*
2	Bayamon	Arecibo	204	214
3	Arecibo	Mayaguez	249	206
4	Mayaguez	Ponce	336	229
5	Ponce	Guayama	150	1,020*
6	Guayama	Humacao	233*	332*
7	Humacao	Carolina	120	132
8	Carolina	San Juan	221*	167*
9	Humacao	San Juan	321*	224*
10	Humacao	Bayamon	322*	225*
11	Guayama	Bayamon	232	1,153*
12	Guayama	Arecibo	205	275
13	Ponce	Arecibo	115	287

\* DC Transfer Limit

The values presented in Table 1 are based on an analysis completed in 2023 using a 2021 Night Peak transmission model which provided the best representation of the transmission system at the time of the analysis. LUMA has continued to refine and verify the models using field data and engineering analysis. LUMA considers the values in Table 1 as estimates that could change during the development of the IRP and through further refinement of the models used to represent the transmission system.

LUMA will use these estimates as the preliminary transfer capacities for the combined resource modeling and transmission modeling using PLEXOS®. LUMA plans to perform additional refined modeling within PSS®E as part of the process of selecting the preferred generation and transmission plan for the IRP.