

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

NEPR
Received:
Apr 8, 2024
10:53 PM

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

CASE NO. NEPR-MI-2021-0013

**SUBJECT: Motion to Submit April 2024 Billing
Integration Report In Compliance with Orders of
January 13 and February 14, 2023, and Inform on the
Tariff Sheet for the Interim EV TOU Rate and
Customer Outreach Progress**

**MOTION TO SUBMIT APRIL 2024 BILLING INTEGRATION REPORT IN
COMPLIANCE WITH ORDERS OF JANUARY 13 AND FEBRUARY 14, 2023, AND
INFORM ON THE TARIFF SHEET FOR THE INTERIM EV TOU RATE AND
CUSTOMER OUTREACH PROGRESS**

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:

I. Relevant Procedural History

1. On July 21, 2022, LUMA submitted to this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) an Electric Vehicle Rate Design Proposal (“EV Rate Design Proposal”) in compliance with the Energy Bureau’s Resolution and Order of November 18, 2021 (“November 18th Order”),¹ as modified by the Energy Bureau’s Resolution and Order of May 19, 2022 (May 19th Order).² In the EV Rate Design Proposal, LUMA proposed

¹ In the November 18th Order, the Energy Bureau ordered LUMA to file on or before September 1, 2022, a First Phase of an Electric Vehicle Charging Infrastructure Deployment Plan (“Phase I EV Plan”) in accordance with the specified requirements set forth in the November 18th Order (*see* November 18th Order on page 4) and file on or before May 31, 2022, a proposal for one or more rate designs targeting certain customer segments and addressing the requirements in the November 18th Order (*see id.* at pages 5-9).

² In the May 19th Order, the Energy Bureau amended the deadlines for filing the draft of the rate design proposal to May 31, 2022, and for filing a draft Phase I EV Plan for September 30, 2022, as well as established a deadline to file a final Rate Design Proposal of June 30, 2022, among others. *See* May 19th

an interim electric vehicle time of use rate (“Interim EV TOU Rate”) and included a proposed tariff sheet for this interim rate (the “Proposed Tariff Sheet”).

2. On September 1, 2022, in compliance with the November 18th Order, LUMA filed a draft Phase I EV Plan (“Draft Phase I EV Plan”). *See 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, 2022.³

3. On January 13, 2023, the Energy Bureau issued a Resolution and Order (the “January 13th Resolution and Order”) making several determinations regarding the Draft Phase I EV Plan and the EV Rate Design Proposal. Among other matters, the Energy Bureau approved the Interim EV TOU Rate in the EV Rate Design Proposal, subject to modifications in the same order. It also directed LUMA to file a Final Phase I EV Plan by March 30, 2023, and to complete the development and launch of the Interim EV TOU Rate by September 30, 2023. *See* January 13th Resolution and Order on pages 9, 10 and 14. In addition, the Energy Bureau ordered LUMA to submit a report every thirty (30) days on the progress with data collection and billing to integrate the Interim EV TOU Rate (“Billing Integration Report”). *See id.* at page 11.

4. In the January 13th Resolution and Order, the Energy Bureau specified requirements for customer outreach and enrollment. It stated that “LUMA shall develop a customer outreach plan that details the timeline and approach for enrolling customers in the EV Time of Use (TOU) Rate”, “describe the market barriers to customer enrollment in the TOU rates and how LUMA’s

Order on page 1. LUMA filed the first draft Rate Design Proposal on May 31, 2022. *See Motion Submitting Draft of EV Rate Design Proposal* filed on May 31, 2022.

³ On September 2, 2022, LUMA resubmitted the Draft Phase I EV Plan document with certain technical repairs and requested this Energy Bureau to accept this corrected version in substitution of the version submitted on September 1, 2022 (*see* LUMA’s *Motion Re-Submitting Exhibit 1 Filed on September 1, 2022 with Technical Repairs and Requesting Substitution of Original Exhibit* of that date) which substitution was accepted by this Energy Bureau by Resolution and Order of September 7, 2022. The term “Phase I EV Plan” as used in this Motion refers to this corrected version.

outreach plan will address each barrier”, provide “estimates of the number planned customer enrollments by year, and what percent of known registered EVs this represents, and demonstrate how [the] planned enrollment matches the revised adoption forecast as described in "Estimating adoption rates" in [...] the Phase I EV Plan”. *See id.* at page 11.

5. In addition, the Energy Bureau indicated in the January 13th Resolution and Order that “LUMA shall enroll customers in the order in which they apply and bill them under the new tariff upon enrollment”. *See id.* Furthermore, it stated that “LUMA shall develop its customer information about the [Interim EV TOU Rate], including the complete tariff sheet and a description of all costs (including any costs for data collection) [...] and send it to EV owners before implementing the tariff, to advise them of the rate and invite them to enroll in it”. *See id.* Moreover, it added that “in its customer tariff sheet for the [Interim EV TOU Rate], LUMA shall present a complete itemization of all charges, including any base and PPCA charges and all components of its FCA charges, so customers can see the complete set of fully itemized charges they will pay.” *Id.*

6. On February 14, 2023, the Energy Bureau issued a Resolution and Order (“February 14th Order”) ordering LUMA to present the Billing Integration Report commencing on March 13, 2023, and “every 30 days thereafter with progress on data collection and billing to integrate the Interim EV Rate”. *See* February 14th Order on page 2.

7. On March 29, 2023, the Energy Bureau issued a Resolution and Order (“March 29th Resolution and Order”) 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 later.⁴ *See* March 29th Resolution and Order on page 3.

8. On May 1, 2023, LUMA submitted to the Energy Bureau the Final Phase I EV Plan in compliance with the January 13th Resolution and Order in the form of the document titled Puerto Rico’s Electric Vehicle Adoption Plan (“PR-EVAP”). This plan outlined strategies aimed at boosting EV adoption, including the implementation of an Interim EV Time-of-Use Rate. *See Motion to Submit Final Phase I EV Plan in Compliance with Resolution and Order of January 13, 2023*, filed on that date.

9. After other related procedural events,⁵ on March 1, 2024, the Energy Bureau issued a Resolution and Order in which it extended the deadline for commencement of the billing integrating the Interim EV TOU Rate until April 30, 2024.

II. Submittal of Billing Integration Report

10. In compliance with the January 13th Resolution and Order and the February 14th Order, LUMA herein submits the Billing Integration Report for April 2024. *See Exhibit 1*.

III. Information on Tariff Sheet and Customer Outreach

11. As informed in the February Billing Integration Report, LUMA has prepared the tariff sheet, in Spanish and English, to be submitted to customers. *See Exhibit 2*. This document, outlined in Exhibit 2, is an updated version of the Proposed Tariff Sheet which incorporates

⁴ This latter option would apply if LUMA submitted justification for a threshold level and explained the need for it.

⁵ On November 30, 2023, LUMA requested the Energy Bureau to extend the deadline for commencement of the billing integrating the interim TOU Rate until April 2024. *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, on page 8. On December 20, 2023, the Energy Bureau issued a Resolution and Order extending this deadline until February 1, 2024. On February 1, 2024, LUMA requested this Energy Bureau to modify this deadline until April 30, 2024. *See Motion to Update Timeline to Commence Billing Integrating Interim EV TOU Rate* filed on February 1, 2024, on page 8.

modifications to ensure consistency in content and formatting with other tariff sheets in the Tariff Book. These modifications aim to remove policy-related language and update the terms and conditions to eliminate redundant terms (which are already present in the General Residential Service Tariff of the customers) and conform them with the development of the program and the directives of the Energy Bureau. The modifications also aim to ensure that the Tariff Sheet is compliant with the regulatory standards while effectively communicating the rights and responsibilities of both LUMA and the customer. The Tariff Sheet was also shared and discussed with the Independent Consumer Protection Office.

12. LUMA will be providing a copy of the Tariff Sheet to all customers showing interest in enrolling in the Interim EV TOU Rate via email through its webpage. In these communications, LUMA will also refer the customers to its website for the program's detailed terms and conditions. Additionally, customers will find information about the Interim EV TOU Rate, the environmental and financial benefits of acquiring an Electric Vehicle, and a map with the locations of charging stations that will be updated as new charging stations are installed, among other data that will help the customer make informed decisions. As of this date, over 100 customers have emailed LUMA regarding the Interim EV TOU Rate.

13. LUMA also herein informs that it developed an internal customer outreach and enrollment plan in alignment with the January 13th Resolution and Order and has been implementing it. LUMA's communication efforts have been successful with a significant increase in customer awareness of the program and interest in participation in the rate. LUMA plans to continue to implement communication strategies that have proven effective and leverage strategic partnerships to increase awareness and adoption of the Interim EV TOU Rate. During this soft launch, LUMA is working on solutions to automate the file transfer and validation process,

including refining enrollment, financing, and billing integration processes. Throughout this phase, testing is limited to participant registration, validation as LUMA clients, and charging sessions with the corresponding vehicles or chargers. The final end-to-end billing integration User Acceptance Test (UAT) is scheduled for April 22, 2024. LUMA will continue to inform the Energy Bureau of its efforts towards the successful implementation of the Interim EV TOU Rate in the forthcoming EV TOU Billing Integration Reports and remains committed to supporting customers as they transition to a more sustainable and reliable electric system.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept *Exhibit 1*** in compliance with the reporting requirement for April 2024 under the Energy Bureau’s January 13th Resolution and Order and February 14th Order with respect to the Billing Integration Reports; and **accept** the Tariff Sheet included in ***Exhibit 1*** in compliance with the requirement in the January 13th Resolution and Order for LUMA to prepare a Tariff Sheet for the Interim EV TOU Rate to be submitted to customers.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 8th day of April 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, 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; apietrantonio@pmalaw.com; azayas@azeng.net; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com; carlosxcedeno@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; epenenergypr@gmail.com; erica.cosme@gsonnell.com; Fberrios@peritoselectricistas.org; francisco.berrios@hotmail.com; franciscojrullan@yahoo.com; gerard.berlinski@toyota.com;

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Exhibit 1

April 2024 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
APRIL 8, 2024

EV Billing Integration Status Update

G On target
 Y Caution
 R Off plan
 C Complete

Key Activity Summary
<ul style="list-style-type: none"> • Enrollment Validation process is under continued improvements as a result of the soft launch, which began on March 5th. • Customer Outreach and Enrollment Implementation tasks to be complete by April 22: <ul style="list-style-type: none"> ○ EV Programs website update and information aligned across different portals ○ Vehicle and Charging Eligibility Infographics ○ Customer Support Training scheduled • Final end-to-end billing Integration User Acceptance Test (UAT) scheduled for April 22.

Key Milestones	Date	Status
Enrollment test (soft launch) started. Est. Completion: April 15, 2024.	March	G
Validated Manual Enrollment Process	March	C
Secured File Transfer Procedure	March	C
Printed Customer Invoice Design	March	C
Finance Integration to CC&B	March	C
Updates and lessons learned added to customer facing materials.	Ongoing	G
Build and test Oracle CC&B process to receive EV Time of Use (TOU) data.	March - April	Y
Launch production-ready processes and monitor steps.	April	Y

Risks / Issues:
<ul style="list-style-type: none"> • Cybersecurity and Compliance concerns related to manual enrollment process on CC&B due to the potential vulnerabilities to the billing system. <ul style="list-style-type: none"> ○ LUMA Risk Acceptance in process



Exhibit 2

Interim EV TOU Rate Tariff Sheet



TARIFA POR TIEMPO DE USO PARA VEHÍCULOS ELÉCTRICOS RESIDENCIALES

DESIGNACIÓN:

EV-TOU

DISPONIBILIDAD:

En todo Puerto Rico.

APLICABILIDAD:

Esta tarifa aplicará a clientes residenciales que utilicen el servicio bajo la tarifa de Servicio Residencial General (GRS por sus siglas en inglés) para uso doméstico y que compren o arrienden un vehículo eléctrico (EV por sus siglas en inglés) enchufable y apto para uso vial, cargándolo a través de una conexión al sistema de distribución de la Autoridad de Energía Eléctrica de Puerto Rico (PREPA) en su residencia principal¹. Los clientes que participen de esta tarifa deberán tener instalado en su residencia un cargador de EV elegible o poseer un vehículo elegible. El servicio bajo esta tarifa comenzará cuando el cargador de EV elegible sea instalado por el cliente o el vehículo elegible sea registrado.

CARÁCTER DEL SERVICIO:

Corriente alterna, 60 Hertz, 2 o 3 cables, monofásico o trifásico; 120, 208 o 240 voltios, a opción de PREPA.

COBROS:

Estas tarifas se aplicarán a todo el consumo registrado a través del cargador de EV del cliente o del vehículo elegible.

Cargo Mensual de Energía

Cargo de Energía en Horario Pico:	\$ 0.129865
Cargo de Energía en Horario Intermedio:	\$ 0.110912
Cargo de Energía en Horario Fuera de Pico:	\$ 0.064932

Además, se aplicarán todas las cláusulas correspondientes a la tarifa GRS, excepto la de Ajuste de Costos de Combustible (FCA, por sus siglas en inglés).

PERIODOS DE PRECIOS:

Horario Pico:	5:00 p.m. a 11:00 p.m., todos los días.
Horario Intermedio:	11:00 p.m. a 9:00 a.m., todos los días.
Horario Fuera de Pico:	9:00 a.m. a 5:00 p.m., todos los días.

TERMINOS Y CONDICIONES:

1. Los clientes que reciban servicio bajo esta tarifa deben demostrar elegibilidad proporcionando lo siguiente:

¹ Esta tarifa fue establecida como parte de un programa piloto en cumplimiento con la Resolución y Orden de la Oficina de Energía de Puerto Rico emitida el 13 de enero de 2023, en el expediente NEPR-MI-2021-0013, In RE: La Implementación de Infraestructura de Carga de Vehículos Eléctricos, y otras órdenes y directivas en ese expediente.



- a. Cargador de EV elegible o vehículo elegible.
 - b. Cuenta válida de servicio eléctrico de PREPA en CC&B con acuerdo de medición residencial.
 - c. Servicio de internet inalámbrico en el sitio.
2. Para los clientes que alquilan su vivienda, se requiere que cuenten con un servicio medido de forma independiente a su nombre para la misma.
 3. El medidor del equipo de carga de EV debe estar conectado y tener la misma dirección que el medidor principal del cliente.
 4. El servicio de carga de EV se proporcionará a través del cableado conectado al medidor único del cliente destinado al GRS. El consumo de energía de esta tarifa se deducirá del medidor principal al facturar los cargos por el uso de energía no relacionado con la carga de vehículos eléctricos (EV) del cliente.
 5. En caso de que el equipo de carga o la telemetría del vehículo no registren el consumo en algún momento, al cliente se le facturarán los cargos según la tarifa GRS por cualquier consumo durante esos momentos.
 6. El servicio de carga de EV estará sujeto a interrupciones y recortes cuando no haya suficiente generación para cubrir un período de demanda pico proyectado.
 7. Si PREPA determina que se están violando los criterios de disponibilidad de esta tarifa, podrá excluir al cliente de esta.

CLÁUSULAS DE RECONCILIACIÓN Y *RIDERS*:

La Tarifa TOU está disponible para los clientes inscritos en la tarifa GRS, la cual está sujeta a las siguientes *Riders*:

1. *Riders* PPCA - Ajuste de Carga por Compra de Energía
2. *Riders* FOS - Subsidio de Combustible
3. *Riders* CILTA - Contribuciones en Lugar de Impuestos (CELI) - Municipios
4. *Riders* SUBA - HH - Subsidios de Ayuda para Humanos
5. *Riders* SUBA -NHH - Subsidios de No Ayuda para Humanos
6. *Riders* EE - Cargo Eficiencia Energética
7. *Riders* NM - Crédito Medición Neta
8. *Riders* SC - Cargo Titulización
9. *Riders* QF - Compras a Instalaciones Calificadas (*Qualifying Facilities*) (Generación Paralela)
10. *Riders* LP - Descuento Preservar Vida
11. *Riders* DD - Débito Directo
12. *Riders* TUP – Reconciliación Tarifa Provisional



RESIDENTIAL ELECTRIC VEHICLE TIME-OF-USE RATE

DESIGNATION:

EV-TOU

AVAILABLE:

Everywhere in Puerto Rico.

APPLICABLE:

This rate shall apply to residential customers taking service under the General Residential Service (GRS) tariff for domestic use who purchase or lease an on-road plug-in electric vehicle (EV) and charge the vehicle through a connection to the Puerto Rico Electric Power Authority (PREPA) distribution system at their primary residence¹. Customers who participate in this rate shall have installed at their residence an eligible EV charger or have an eligible vehicle. Service under this rate shall commence when the eligible EV charger is installed by the customer, or the eligible vehicle registered.

CHARACTER OF SERVICE:

Alternating current, 60 Hertz, 2 or 3 wires, single or three-phase; 120, 208, or 240 volts, at PREPA's option.

CHARGES:

These rates will be charged for all consumption recorded through the customer's EV charger or eligible vehicle.

Monthly Energy Charge

On-Peak Energy Charge:	\$ 0.129865
Shoulder Energy Charge:	\$ 0.110912
Off-Peak Energy Charge:	\$ 0.064932

Customers shall also be charged all applicable riders to the GRS tariff, except for the Fuel Cost Adjustment (FCA) rider.

PRICING PERIODS:

On-Peak:	5:00 p.m. to 11:00 p.m., all days.
Shoulder:	11:00 p.m. to 9:00 a.m., all days.
Off-Peak:	9:00 a.m. to 5:00 p.m., all days.

TERMS AND CONDITIONS:

¹This rate was established as part of a pilot program in compliance with the Puerto Rico Energy Bureau's Resolution and Order issued on January 13, 2023, in docket NEPR-MI-2021-0013, In RE: Electric Vehicle Charging Infrastructure Deployment, and other orders and directives in that docket.



1. Customers taking service under this rate must demonstrate eligibility by the following requirements:
 - a. Eligible EV charger or eligible vehicle
 - b. Valid PREPA electric service account in CC&B with active residential metered agreement
 - c. Wireless internet service at the site
2. Customers who are renting their dwelling must have a separately metered service under their name for their dwelling.
3. The meter for the EV charging equipment must be connected to and have the same address as the customer's main meter.
4. EV charging service shall be served through wiring connected to the customer's single meter provided for General Residential Service. Consumption under this rate will be subtracted from the main meter for purposes of billing the customer's energy charges for non-EV charging usage.
5. Should the charging equipment or the vehicle telematics fail to record consumption at any time, the customer will be billed the charges under the GRS tariff for any consumption during those times.
6. EV charging service shall be subject to interruption and curtailment when there is insufficient generation to meet a projected peak demand period.
7. If PREPA finds that the availability criteria of this rate are being violated, it may remove the customer from this rate.

RECONCILIATION CLAUSES AND RIDERS:

TOU Rate is available to customers enrolled in the GRS tariff, which is subject to the following Riders:

1. Rider PPCA – Purchased Power Charge Adjustment
2. Rider FOS – Fuel Oil Subsidy
3. Rider CILTA – Contributions in Lieu of Taxes (CILT) – Municipalities
4. Rider SUBA - HH – Help to Humans Subsidies
5. Rider SUBA - NHH – Non-Help to Humans Subsidies
6. Rider EE – Energy Efficiency Charge
7. Rider NM – Net Metering Charge
8. Rider SC – Securitization Charge
9. Rider QF – Purchases from Qualifying Facilities (Parallel Generation)
10. Rider LP – Life Preserving Discount Rider
11. Rider DD – Direct Debit Rider
12. Rider TUP – True of Provisional Rate Increase