

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

NEPR Received: Apr 29, 2024 5:48 PM
--

IN RE:

PROCESS FOR THE ADOPTION OF
REGULATION FOR DISTRIBUTION
RESOURCE PLANNING

CASE NO.: NEPR-MI-2019-0011

SUBJECT: Request to Reschedule Technical
Conference set for May 20, 2024

**MOTION TO REQUEST THE RESCHEDULING OF THE TECHNICAL
CONFERENCE SET FOR MAY 20, 2024**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy Servco, LLC** (“ServCo”) (jointly referred to as “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On December 31, 2020, this Honorable Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order in the instant proceeding (“December 31st Order”) ordering the Puerto Rico Electric Power Authority (“PREPA”) and LUMA to initiate the work needed to complete the following three tasks: (1) the creation of voltage level maps, (2) the creation of preliminary maps of interconnection capacity, and (3) updating and completing a power grid inventory. *See* December 31 Order at pp. 8-10.

2. On July 21, 2021, PREPA informed the Energy Bureau that it had created the voltage level maps, uploaded these maps onto the Electronic Filing Portal for Filing of Distributed Generation Projects, and these had gone live on May 28, 2021 (the “Voltage Level Maps”). *See Informative Motion Regarding Voltage Level Maps* filed by PREPA on July 21, 2021.

3. On October 1, 2021, LUMA informed the Energy Bureau that as of September 30, 2021, interconnection capacity maps had been made available for use by any distributed generation (“DG”) customers or developers on the lumapr.com website (“Interconnection Capacity Maps”). See LUMA’s *Informative Motion on Compliance with Order on Interconnection Capacity Maps* of October 1, 2021.

4. During 2021, the Energy Bureau held compliance hearings and LUMA submitted presentations for each of these hearings providing updates on the status of the three tasks established by the December 31st Order.¹ On December 8, 2021, LUMA submitted the presentation for the last of these compliance hearings, in which a close-out date for all activities/milestones for the power grid inventory was set for 2025. See *Motion Submitting Presentation for Compliance Hearing* filed on December 8, 2021.

5. On May 25, 2022, the Energy Bureau issued a Resolution and Order, notified on May 26, 2022 (“May 26th Order”), ordering LUMA to: (1) provide more detailed information regarding the localized interconnection capacity, upon request of a proponent, in the interconnection filing platform within ten (10) working days from a proponent’s request for this information, including the information specified in the May 26th Order (*see id.* at p. 1, Paragraph 1); (2) by September 30, 2022, expeditiously conduct any necessary processes (e.g., administrative, programming or the like) to update the Voltage Level and Interconnection Capacity Maps simultaneously with the completion of the interconnection of a DG system so that these reflect the most recent information of the state of the system (*see id.* at Paragraph 2); (3) in the

¹ See *Motion Submitting Presentation in Anticipation for Compliance Hearing Scheduled for February 10, 2021*, filed on February 5, 2021, *Motion Submitting Presentation in Anticipation for Compliance Hearing Scheduled for July 14, 2021* filed on July 9, 2021, *Motion Submitting Presentation for Compliance Hearing* filed on October 7, 2021, and *Motion Submitting Presentation for Compliance Hearing* filed on December 8, 2021.

meantime and until the process in the foregoing paragraph is completed, update the Voltage Level and Interconnection Capacity Maps at least monthly (*see id.* at Paragraph 3); (4) ensure the maps indicate the date of updating so that the user can use this information in its decision-making regarding interconnection applications and similar matters (*see id.* at Paragraph 4); (5) submit to the Energy Bureau, on or before June 30, 2022, a detailed implementation plan to achieve compliance with the requirements in the May 26th Order, including a Gantt Chart reflecting the anticipated process to achieve compliance (the “Implementation Plan”) (*see id.* at Paragraph 5); (6) submit monthly progress reports regarding the execution of the Implementation Plan on July 30, 2022, and August 31, 2022 (*see id.* at p. 3, Paragraph 6); and (7) submit a final implementation report regarding the matters ordered in the May 26th Order on or before September 30, 2022 (*see id.* at Paragraph 7).

6. On July 30, 2022, in compliance with the May 26th Order and in accordance with an extension requested by LUMA², LUMA submitted an implementation plan detailing the steps to achieve compliance with the requirements in the May 26th Order and including a Gantt Chart reflecting the anticipated process to achieve compliance with such requirements (“Implementation Plan”). *See Motion to Submit Implementation Plan in Compliance with Energy Bureau’s Resolution and Order Notified on May 26, 2022 and Request for Modification of Order to Align Timelines in Implementation Plan* filed on that date (“July 30th Motion”). In the July 30th Motion, LUMA also requested the Energy Bureau to modify the timelines for the required tasks under the May 26th Order to conform with the timelines in the Implementation Plan. *See id.* at p. 4.

² *See Motion Requesting Extension to Submit Implementation Plan Required Under Energy Bureau’s Resolution and Order Notified on May 26, 2022* filed on June 15, 2022.

7. On April 11, 2024, this Honorable Energy Bureau issued and Resolution and Order (“April 11th Order”) taking notice of the Implementation Plan submitted by LUMA on July 30, 2022 and scheduling a Technical Conference for May 20, 2024, at 10:00 a.m. (the “Technical Conference”) “to discuss in detail the current status of the implementation by LUMA of the [May 25th Order], including, but not limited to: (i) the current status of the implementation by LUMA of the Voltage Level Maps; (ii) the current status of implementation by LUMA regarding the Interconnection Capacity Maps; [and] (iii) the current status of implementation by LUMA regarding the Power Grid inventory”. *See* April 11th Order on page 3 (translation ours).

8. In the April 11th Order, the Energy Bureau also orders LUMA to submit by May 1, 2024 an updated version of the Implementation Plan and to appear at a Technical Conference to be held in person scheduled for May 20, 2024, at 10:00 a.m. With respect to the Technical Conference, the Energy Bureau further orders LUMA to “ensure that all the representatives involved in the pertinent documents are available; [...] that said representatives be ready to respond to questions that the Energy Bureau’s personnel and/or Commissioners may have; and [...] timely present a copy of any Power Point presentation, images or materials that LUMA may have the intention of using during the Technical Conference”. *See id.* (translation ours).

9. In preparing for the Technical Conference, LUMA has identified the key individuals with the most knowledge on the technical requirements relating to and/or the implementation of the Voltage Level Maps, Interconnection Capacity Maps and Power Grid Inventory to participate in the Technical Conference, as required by the April 11th Order. Among these is a subject matter expert who has vast knowledge of the technical interconnection requirements and the topics discussed in the April 11th Order. However, this subject matter expert is not expected to be available on the scheduled date of the Technical Conference because he will

be on extended work leave. Given his knowledge of these subjects, his attendance at the Technical Conference is vital to ensure LUMA is most thoroughly prepared to answer the Energy Bureau's questions as required by the April 11th Order.

10. In view of the foregoing, LUMA respectfully requests this Honorable Energy Bureau to reschedule the Technical Conference to June 12, 2024, when LUMA's key subject matter expert will be back from his work leave and available to attend. Although LUMA's preferred date is June 12, 2024, at 10:00 am, LUMA provides the following alternative dates when LUMA's team, including LUMA's key subject matter expert, will also be available: June 13, 2024, or June 18, 2024, at 10:00 am.

WHEREFORE, LUMA respectfully requests this Honorable Energy Bureau to **take notice** of the above and **grant** LUMA's request to **reschedule** the Technical Conference to June 12, 2024, or in the alternative, for any of the remaining dates and times offered in paragraph 10 of this Motion.

RESPECTFULLY SUBMITTED.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to PREPA at lionel.santa@prepa.com and the Independent Consumer Protection Office at hrivera@jrsp.pr.gov.

In San Juan, Puerto Rico, this 29th of April 2024.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147 / 9145
Fax 939-697-6141 / 6145

/s/ Laura T. Rozas

Laura T. Rosas

RUA No. 10,398

laura.rozas@us.dlapiper.com

/s/ Valeria Belvis Aquino

Valeria Belvis Aquino

RUA No. 22,584

valeria.belvis@us.dlapiper.com