

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

NEPR

Received:

May 21, 2024

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IN RE:
INFORMES DE PROGRESO DE
INTERCONEXIÓN DE LA AUTORIDAD
DE ENERGÍA ELÉCTRICA DE PUERTO
RICO

CASE NO. NEPR-MI-2019-0016

SUBJECT: Motion Submitting Partial Responses in Compliance with Bench Order Issued at the Compliance Hearing Held on May 6, 2024

**MOTION SUBMITTING PARTIAL RESPONSES
IN COMPLIANCE WITH THE BENCH ORDER ISSUED AT
THE COMPLIANCE HEARING HELD ON MAY 6, 2024**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, LUMA), through the respective undersigned legal counsel and respectfully state and submit the following:

I. Introduction

In accordance with the directives from the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) in this proceeding, LUMA hereby submits its responses to the Bench Orders issued during the May 6, 2024, Technical Conference. These responses address specific items discussed at the conference. The captioned proceeding involves oversight by this Energy Bureau of procedures to handle requests for interconnections of distributed generation systems and microgrids to the Transmission and Distribution System (“T&D System”), pursuant to Acts 57-2014 and 17-2019.

II. Relevant Procedural Background

1. Since July 2020, this Energy Bureau has required that the Puerto Rico Electric Power Authority (“PREPA”) submit quarterly progress reports on interconnections. *See* Resolution and Order of July 21, 2020. The docket of this proceeding also reveals that the Energy Bureau has held several compliance hearings.

2. On May 7, 2021, the Energy Bureau issued a Resolution and Order in which it took notice of the transition process underway between LUMA and PREPA (“May 7th Resolution and Order”). On June 1, 2021, LUMA assumed its role as Operator of the T&D System per the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020, as supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement.

3. In the May 7th Resolution and Order, the Energy Bureau ordered that LUMA shall file the quarterly progress reports that the Energy Bureau has required in this proceeding. *See* May 7th Resolution and Order on page 1.

4. On August 27, 2021, this Energy Bureau issued a Resolution and Order directing LUMA to file a copy of the presentation to be offered in every compliance hearing with every Interconnections Progress Report.

5. On April 4, 2024, the Energy Bureau issued a Resolution and Order in which it instructed LUMA to file the Interconnections Progress Report for the period of January through March 2024 on April 25, 2024 (“April 4th Order”). It also scheduled the Compliance Hearing to discuss said report for May 6, 2024, at 10:00 a.m. Moreover, the Energy Bureau requested LUMA to incorporate certain information and data based on the specific definitions provided in the April 4th Order in subsequent interconnections progress reports.

6. On April 25, 2024, LUMA filed a *Motion Submitting Interconnections Progress Report for January through March 2024 and Supporting Materials*. LUMA submitted the Interconnections Progress Report for the January through March 2024 quarter, adhering to the requirements outlined in the Resolution and Order of July 21, 2020. Further, LUMA submitted the Distributed Generation Systems Data File (“DG Data File”) in compliance with the Resolution and Order of September 30, 2020. Also, in compliance with the April 4th Order, LUMA submitted the DG Data File divided by customer class, including residential, commercial, industrial, and agricultural. In addition, LUMA included the presentation for the next Compliance Hearing and the additional data and information requested by the Energy Bureau in the April 4th Order.

7. On May 6, 2024, the Compliance Hearing for this instant proceeding was held. During the presentation, the Commissioners requested different information from the LUMA representatives on the quarterly progress report and matters related to the timeframe, customer communications, and costs of the supplementary studies after interconnection (“May 6th Bench Order”). The Energy Bureau made five requests for information during the Compliance Hearing. The Energy Bureau granted LUMA until May 21, 2024, to provide its responses to the different requests for information posed.

8. In compliance with the May 6th Bench Order, LUMA respectfully requests that this Energy Bureau receive and accept the responses to some of the requests for information posed during the Compliance Hearing, hereby submitted as Exhibit 1 to this Motion. The responses address those requests for information related to an explanation for applying a 30-day window in the quarterly report; and customer communications on the fee for supplementary studies.

9. However, LUMA is currently working on completing its responses to those requests for information related to the supplementary studies completion timeline, options to

approach those cases where customers reject paying the \$300 fee for a supplementary study, and LUMA's multi-departmental approach to the various upgrade costs scenarios. These topics are being discussed amongst different LUMA departments to present comprehensive and responsible options to this Energy Bureau. Thus, LUMA respectfully requests an extension to submit its responses to those requests for information by June 11, 2024.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the responses to some of the requests for information posed during the Compliance Hearing as Exhibit 1 to this Motion; and **grant** LUMA an extension of time to submit its responses to the outstanding requests for information of the May 6th Bench Order until June 11, 2024.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this May 21st, 2024.

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 the attorney for PREPA, Alexis Rivera, arivera@gmlex.net. Notice will also be sent to the Office of the Independent Consumer Protection Office, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and to counsel for the Puerto Rico Solar Energy Industries Association Corp. ("SESA"), javrua@sesapr.org.



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Exhibit 1



Response to May 6th
Technical Conference
Bench Orders

NEPR-MI-2019-0016

MAY 21, 2024

May 6th Technical Conference Bench Orders

NEPR-MI-2019-0016

Response: TC-RFI-LUMA-MI-2019-0016-20240506-PREB-003

INTRODUCTION

LUMA hereby provides its responses to the Bench Orders issued by the Puerto Rico Energy Bureau (“Energy Bureau”) during the May 6, 2024, Technical Conference. The responses outlined herein address specific items discussed during the May 6th Technical Conference.

1.CALCULATION OF COMPLIANCE WITH THE 30-DAY ACTIVATION REQUIREMENT

REQUEST

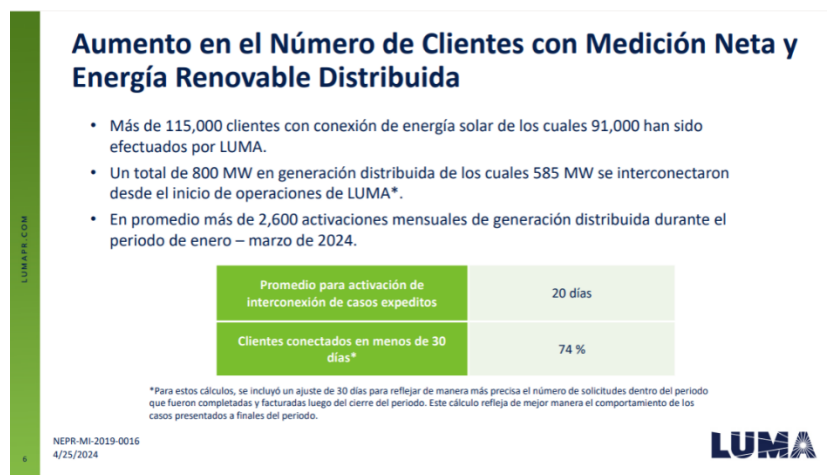
Verify the footnote on page six and explain the application of the 30-day period.

RESPONSE

During the January 24, 2024, Interconnection Progress Report Compliance Hearing, the Energy Bureau acknowledged and stated that the indicator herein needed to be modified. Therefore, LUMA was requested to amend the indicator for the average number of days for expedited case interconnection activations. Figure 1 presents the amended method in which LUMA is to report the indicator.

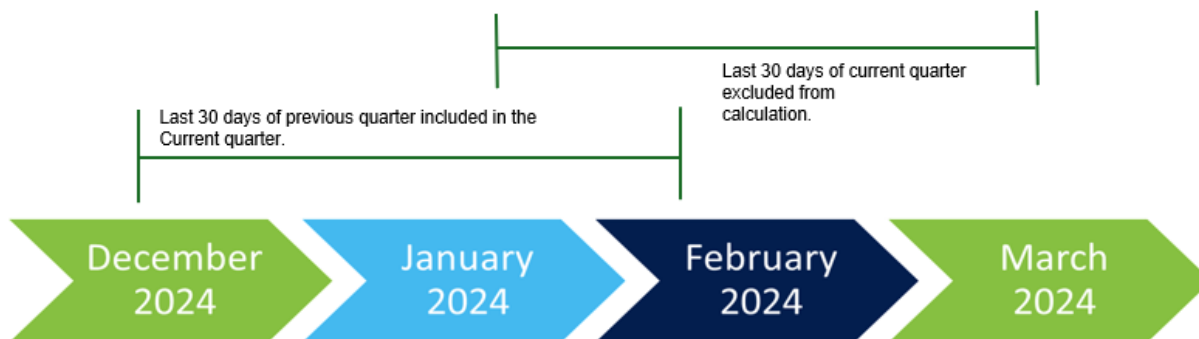
Figure 1 below shows the slide and footnote referenced by the Energy Bureau in its Bench Order.

Figure 1: Slide 6 - “Increase in the number of Net Metering customers and Distributed Renewable Energy”.



May 6th Technical Conference Bench Orders

Figure 2: Periods reported for average number of days for expedited case interconnection activations currently and previously used.



To account for the 30-day activation period required for interconnecting new clients, the last 30 days of the previous quarter will be considered as part of the current quarter, while the last 30 days of the current quarter will be excluded and included in the next quarter. This adjustment will be applied from December 1 to February 29; and March 1 to May 31.

Figure 2 reflects the methodology applied by LUMA for purposes of reporting on the number of quarterly activations made within 30 days or less from the date an application was submitted and referenced in the footnote in slide 6 of the May 6th TC presentation (see Figure 1 above). The method described therein accurately reflects the number of customers activated within the 30-day timeframe during the reporting period of December 1, 2023, to February 29, 2024. Customers who apply within 30 days or less of the end of a quarter (i.e., March 1-31, 2024) do not count towards the number of activations within 30 days or less reported in that quarter because the 30-day term to review such customers' applications would end after the close of the quarter.

Applications submitted 30 days or less prior to the end of the quarter are reflected in the following quarterly report.

2.SUPPLEMENTAL STUDIES COMPLETION TIMELINE

REQUEST

The Energy Bureau requested a breakdown of the hours required to complete the Supplemental Studies.

RESPONSE

LUMA will provide the Supplemental Studies completion timelines by June 11, 2024.

3.SUPPLEMENTAL STUDY OPTIONS

REQUEST

Present the options for collecting the Supplemental Studies \$300 fee for clients that do not pay.

RESPONSE

LUMA will provide the options for collecting the Supplemental Studies \$300 fee by June 11, 2024.

May 6th Technical Conference Bench Orders

4.CLIENT COMMUNICATIONS

REQUEST

Share the letter notifying clients about the Supplemental Study Costs.

RESPONSE

Between November and December 2023, notices were posted in the PREPA LUMA portal. Two sets of communication were delivered. The first was distributed as a Portal notification (Figure 3), which is the official notice that a Supplemental study is required. The second was a portal notification sent in December to contacts registered with the portal, which included more generic information regarding Supplemental studies.

Figure 3: Supplemental Study cost notification posted in PREPA LUMA Portal

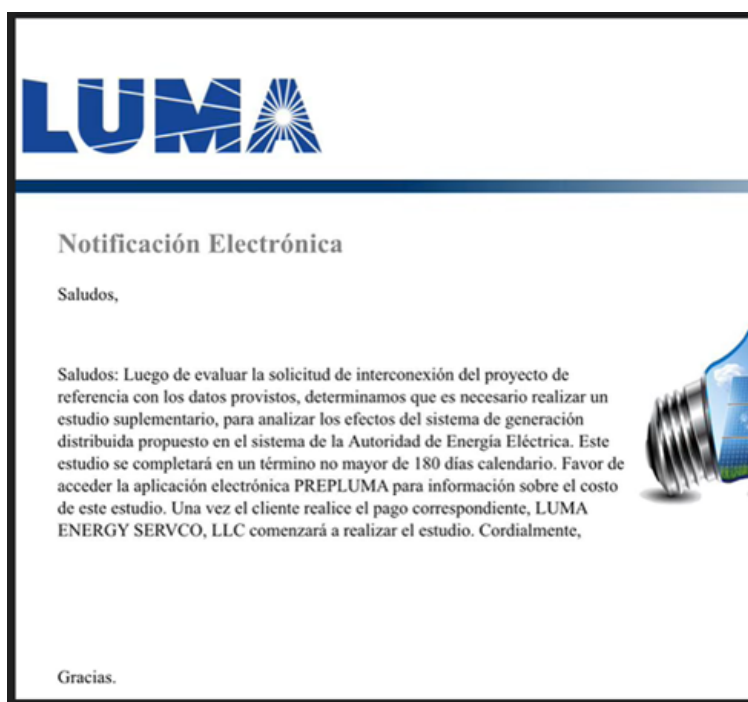


Figure 4: Portal display of estimated cost for the Supplemental Study.

Project Number	Date	Detailed Description	Paid?	Amount
	15/12/2023 02:46 AM	Estimado por Estudio Suplementario	No	\$300.00

May 6th Technical Conference Bench Orders

5.UPGRADE COSTS SCENARIOS

REQUEST

Please propose different scenarios and ways the Energy Bureau could distribute the upgrade costs.

RESPONSE

LUMA will provide a proposal for different scenarios to distribute the upgrade costs by June 11, 2024.