

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

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| <b>NEPR</b><br><br><b>Received:</b><br><br><b>Jun 28, 2024</b><br><br><b>9:17 PM</b> |
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**IN RE:**

PLAN PRIORITARIO PARA LA  
ESTABILIZACIÓN DE LA RED  
ELÉCTRICA

**CASE NO. NEPR-MI-2024-0005**

**SUBJECT:** Request For Extension of Time to  
Submit Preliminary Plan Required by the  
Resolution and Order of June 13, 2024

**REQUEST FOR EXTENSION OF TIME TO SUBMIT THE PRELIMINARY PLAN  
REQUIRED BY THE RESOLUTION AND ORDER OF JUNE 13, 2024**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC** (collectively “LUMA”) through their undersigned legal representatives and respectfully submit and request the following:

1. On June 13, 2024, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“June 13<sup>th</sup> Order”) ordering LUMA, the Puerto Rico Electric Power Authority (“PREPA”) and Genera PR, LLC (“Genera”) to develop an “aggressive preliminary plan of improvements to the electric system that mitigates recurring failures and eliminates weak points that affect the quality of electric service” (“Preliminary Plan”). *See* June 13<sup>th</sup> Order on page 1 (translation ours). According to the Energy Bureau, there is a need to manage and resolve the current electric situation, which it describes as having “recurrent failures and weak points”. *See id.* (translation ours). While it acknowledges the current vulnerable conditions of the electric system, the Energy Bureau also emphasizes the need to identify and mitigate the failures in the system to ensure a safe, reliable and efficient power supply. *See id.*

2. The Energy Bureau requires that this Preliminary Plan include “a comprehensive analysis of the electric system ‘as is’ (as it is currently) to identify weak points and any other factor

that contributes to the instability” and that it “detail factors such as the need to upgrade protection schemes, the need for redundant lines and/or equipment, vegetation management, lack of reliable generation, the need for frequency and inertia control and persistent load shedding”. *See id.* (translation ours). The Energy Bureau further requires that the Preliminary Plan “include an estimate detailing the costs necessary to repair and conduct such upgrades to the electric system and identify whether they are to be covered by federal, state or budget funds and/or the rate itself” and “include a detailed timeline with specific and measurable goals ... for the execution of the necessary repairs and implementations”.<sup>1</sup> *See id.* at pages 1-2 (translation ours).

3. The implementation of this plan is to be completed in a maximum period of two (2) years. *See id.* at page 2.

4. As for the timeframe to prepare the Preliminary Plan, the Energy Bureau orders LUMA, PREPA and Genera, to individually present their respective Preliminary Plans within a term of twenty (20) days from the date of the notification of the June 13<sup>th</sup> Order. *See id.* The Energy Bureau also explains that, once submitted, and after the required evaluation, the Energy Bureau will schedule a public hearing for public expression on the plans. *See id.*

5. LUMA hereby informs that it has been diligently working on the preparation of the Preliminary Plan and, as of this date, it has developed a preliminary working draft. However, given the extensive scope of the plan and required details in a variety of subjects (including system analyses, validation of identified needs for repairs and upgrades, estimated costs, implementation timelines, and funding sources), the preparation of the plan requires significant coordination across several LUMA departments. Furthermore, LUMA is currently reassessing its Preliminary Plan to

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<sup>1</sup> The plan must also contemplate the Genera battery project approved in Case No. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan- December 2020*, and LUMA’s proposed batteries concept approved in Case No. NEPR-MI-2024-0002, *In Re: LUMA’s Accelerated Storage Addition Program*.

incorporate details about the recent events, ensuring that it has the most current and comprehensive list of critical points of the T&D System. Given the above, and the need to evaluate contingency elements that may affect the implementation of the plan, the Preliminary Plan will require further cross-departmental reviews that are anticipated to extend beyond the originally anticipated date to have a complete, internally verified, version acceptable to LUMA. In light of these circumstances, LUMA anticipates that it will need additional time to complete this review process and have a completed Preliminary Plan for submittal to this Honorable Energy Bureau. LUMA reasonably estimates that the complete Preliminary Plan may be ready for submittal to this Energy Bureau by July 19, 2024. LUMA respectfully submits that this brief additional time will allow for LUMA to achieve a more thorough, clear, verified, and implementable Preliminary Plan that will more effectively address the requirements of the June 13<sup>th</sup> Order and be better positioned for the ensuing Energy Bureau review and public comment.

6. Based on the above, LUMA respectfully requests a brief extension to submit LUMA's Preliminary Plan until July 19, 2024.

7. LUMA makes this request in good faith and to ensure the quality of the Preliminary Plan and believes that this brief extension of time will not unduly delay proceedings in this case.

**WHEREFORE**, LUMA respectfully requests the Energy Bureau to take notice of the aforementioned and grant LUMA until July 19, 2024, to submit its Preliminary Plan in compliance with the June 13<sup>th</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on this 28<sup>th</sup> day of June 2024.

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau. I will send an electronic copy of this Motion to counsel for PREPA Alexis G. Rivera

Medina, arivera@gmlex.net, and to Genera PR LLC, alopez@sbgblaw.com, jfr@sbgblaw.com,  
and regulatory@genera-pr.com.



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