COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

IN RE:	**CASE NO.:** NEPR-MI-2022-0001
ENERGY EFFICIENCY AND DEMAND RESPONSE TRANSITION PERIOD PLAN	**SUBJECT:** Motion to Submit FY2024 Q4 Consolidated Transition Period Plan and Demand Response Administrative Cost Quarterly Report and Request for Approval of Template for these Quarterly Reports

MOTION TO SUBMIT FY2024 Q4 CONSOLIDATED TRANSITION PERIOD PLAN AND DEMAND RESPONSE ADMINISTRATIVE COST QUARTERLY REPORT AND REQUEST FOR APPROVAL OF TEMPLATE FOR THESE QUARTERLY REPORTS

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo"), (jointly referred to as "LUMA"), and respectfully state and request the following:

I. Introduction

As the system operator, LUMA is responsible for facilitating the implementation of Puerto Rico's public energy policy, including key customer initiatives such as Energy Efficiency ("EE") and Demand Response ("DR") Programs, which are required by law and mandated by the Puerto Rico Energy Bureau ("Energy Bureau"). With this motion, LUMA is submitting to the Energy Bureau, in Exhibit 1, a consolidated report for the fourth quarter of the 2024 fiscal year providing information and data on progress, performance, and costs associated with the implementation of the EE and DR programs developed by LUMA and information on DR program administrative

costs which are recovered through the Purchase Power Charge Adjustment ("PPCA"), all as per the Energy Bureau's directives.

The consolidated report includes, among others, information and updates on the Customer Energy Battery Sharing ("CBES") Program, including its expansion to commercial customers; education and outreach activities aimed at building market awareness and readiness; details on the progress of the in-store discount program (providing point-of-sale discount for EE measures) launched in July 2024; incentives for customers purchasing energy efficient equipment through the residential EE rebate program; incentives for businesses adopting efficient lighting, HVAC, and water heating equipment through the EE rebate program; provision of EE measures at no cost to residential and business customers through the EE kit program; and the restoration and energy savings through the conversion to LED lamps under the Community Street Light Initiative(CSI).

LUMA's EE and DR programs are designed to build a more reliable and resilient energy system for the people of Puerto Rico and advance the energy efficiency marketplace in the region. The information included in Exhibit 1 covers the period between April 1, 2024, to June 30, 2024.

LUMA is also requesting the Energy Bureau's approval of the template used in the attached report for future quarterly TPP reports, as further discussed in this motion.

II. Relevant Background and Procedural History

1. On June 21, 2022, LUMA filed with the Energy Bureau, in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation, and Monitoring*, a proposed Energy Efficiency and Demand Response Transition Period Plan containing the description of various quick-start EE and DR Programs to be implemented by LUMA during a two (2)-year Transition Period and associated budgets for Fiscal Years ("FY") 2023 and 2024 ("Proposed TPP"). *See Motion Submitting Proposed EE/DR Transition Period Plan* in Case No. NEPR-MI-

2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring* of that date and its *Exhibit 1*. The EE and DR Programs in the Proposed TPP included an Education and Outreach Program; a Residential EE Rebate Program, providing a prescriptive incentive to customers purchasing energy efficient equipment from a list of qualified measures, a Business EE Rebate Program, offering incentives to businesses for eligible energy efficiency measures; an In-Store EE Discount Program, providing a point-of-sale discount for eligible energy efficiency measures and geo-targeting of stores in low-income areas to provide low-income customers with greater access to energy efficiency opportunities; an Economic Demand Response Program, including voluntary load reduction and/or load shifting during DR events triggered by economic conditions; an Emergency DR Program, targeting commercial and industrial customers for customers to voluntarily reduce load and/or shift load to back up generators during DR events; and a Battery DR Response Program targeting residential customers with behind the meter batteries and providing incentives for load shifting to batteries during DR event periods.

2. On February 16, 2023, this Energy Bureau issued a Resolution and Order in the instant proceeding (the "February 16th Order") in which it considered, amended, and approved the Proposed TPP (as approved, the "TPP"). Among others, the Energy Bureau established deadlines and performance incentive indicators for several activities under the TPP (*see id*. at pages 20, 21, 23, 27 and 30 and Table 2), as well as reporting requirements and deadlines (*see id*. at page 18 and Table 1). The Energy Bureau also ordered LUMA to deliver annual reports and quarterly reports as per the reporting schedule in Table 1 of the February 16th Order, titled "Transition Period Report and Filing Schedule" ("Table 1"). Table 1 provided for the filing of annual reports within one hundred and twenty (120) days following the end of the program year (each a "TPP Annual Report" and, collectively, "TPP Annual Reports") and quarterly reports within sixty (60) days of

the end of each quarter (each a "TPP Quarterly Report" and collectively, "TPP Quarterly Reports")[1]. *See id*. at page 18. In addition, the Energy Bureau ordered LUMA to review and provide input on the Energy Bureau's data reporting templates for the TPP Quarterly Reports and TPP Annual Reports and "until such time as the reporting templates are available, report on all metrics identified in Section 6 of the Proposed TPP". *See* February 16th Order on page 19.

3. On March 8, 2023, LUMA filed a motion requesting reconsideration of certain requirements in the February 16th Order relating to performance targets. *See Motion for Reconsideration of Resolution and Order of February 16, 2023, and Request to Vacate Deadlines* of that date ("March 8th Motion").

4. On April 3, 2023, the Energy Bureau issued a Resolution and Order ("April 3rd Order") in which, among others, it vacated the performance target requirements in the February 16th Order, modified the deadlines for certain requirements under the February 16th Order, and ordered LUMA to file a petition for approval of the EE Rider on or before April 11, 2023.

5. On April 11, 2023, LUMA submitted a petition for approval of the EE Rider ("EE Rider Petition"). *See Motion to Submit EE Rider* filed on that date. *See id*. Exhibit 1 at page 7.

6. On May 19, 2023, LUMA filed a revised EE Rider Petition[2] in which, among others, it combined the TPP Emergency DR and Battery DR programs into one program. *See Motion to Submit Revised Exhibit 1 to EE Rider Petition and Translation Thereof, in Compliance with Bench Order of May 5, 2023,* filed on May 19, 2023, Exhibit 1, Sections 2.1 and 2.3.

[1] Specifically, the February 16th Order provided for filing of these reports for FY2024 on November 23, 2023, March 29, 2024, March 29, 2024, and August 29, 2024, corresponding to the first quarter ("Q1"), second quarter ("Q2"), third quarter ("Q3") and fourth quarter ("Q4"), respectively. *See id*. Except for the deadline for the Q2 report, this timeline is consistent with the requirement in the Regulation on Energy Efficiency, Regulation 9637 ("EE Regulation"), which provides that quarterly reports on the implementation of the Transition Period Plan must be filed within sixty (60) day of the end of the quarter. *See* Regulation 9637, Section 2.02(E)(1)(a). The Q2 deadline appears to be a typographical error and should be February 29, 2024.

[2] This in compliance with an Energy Bureau bench order of May 5, 2023.

7. On July 31, 2023, the Energy Bureau issued a Resolution and Order in the Permanent Rate Case ("July 31st Resolution and Order"), in which it determined, among others, that the cost of DR programs will not form part of the EE Rider and ordered LUMA to contemplate the DR programs as part of the proposal of factors corresponding to the PPCA. *See* July 31st Resolution and Order on pages 8 and 10.

8. On August 11, 2023, the Energy Bureau issued a Resolution and Order ("August 11th Order") in which, among others, it ordered LUMA to file on or before August 23, 2023, for the Energy Bureau's approval, estimated costs associated with the Battery Emergency DR Program of the TPP (now referred to by LUMA as the Customer Battery Energy Sharing Initiative or "CBES") to be recovered through the PPCA. *See* August 11th Order on page 3.

9. On August 23, 2023, LUMA submitted to the Energy Bureau the proposed estimated costs associated with the CBES. *See Motion to Submit Costs Associated with Emergency DR Program in Compliance with Resolution and Order of August 11, 2023, and Request for Confidential Treatment* filed August 23, 2023 ("August 23rd Motion").

10. On August 29, 2023, the Energy Bureau issued a Resolution and Order ("August 29th Order") accepting the CBES budget proposed by LUMA and determining that administrative costs for DR Programs will be recovered through the PPCA. *See* August 29th Order on page 3. Relatedly, the Energy Bureau required LUMA to submit reports quarterly, within forty-five (45) days after each quarter of a fiscal year closes (each a "DR Administrative Costs Quarterly Report" and, collectively, "DR Administrative Costs Quarterly Reports") meeting the requirements set forth the August 29th Order. *See id.* at pages 3 and 4. The Energy Bureau also indicated that the Q4 report was to include the year-end report ("DR Administrative Costs Year-End Report"). *See id*. footnote 8.

11. On August 29, 2023, LUMA submitted the FY2023 Q4 Quarterly TPP Report, in compliance with the February 16th Order. *See Motion to Submit FY 2023 Q4 TPP Report* of that date.

12. On September 22, 2023, the Energy Bureau issued a Resolution and Order in Case *In re LUMA's Initial Budgets*, Case No. NEPR-MI-2021-0004 ("September 22nd Budgets Order") in which it decided that the costs of the EE programs of the TPP would be recovered through base rate revenues, rather than through the EE Rider. *See* September 22nd Budgets Order on page 9.

13. On September 29, 2023, the Energy Bureau issued a Resolution and Order in the Permanent Rate Case in which it indicated, based on the September 22nd Budgets Order, that the charge for the EE Rider for FY2023 was eliminated (*See* September 29th Rate Order on page 8) and ordered LUMA to include in the customer invoices an EE Rider charge equal to zero (0) (*see id*.). [3]

14. On October 30, 2023, LUMA filed a motion requesting this Energy Bureau to extend for an additional fiscal year the TPP, with the same cadence of quarterly and annual reporting as in the TPP, and to delay the schedule for the Three-Year EE and DR Plan by one year. *See Request to Extend by One Additional Year the Deadline to File the Three-Year Plan, Concomitant Deadlines and Extend the Term of the Transition Period Plan for An Additional Fiscal Year* ("October 30th Motion") of that date, pages 15-16 and Exhibit 1.

15. On October 30, 2023, LUMA filed a *Motion to Submit TPP FY2023 Annual Report* in compliance with the February 16th Order.

[3] The Energy Bureau had previously suspended the EE charge for July 2023 in a Resolution and Order issued on June 30, 2023, in the Permanent Rate Case ("June 30th Resolution and Order"). *See* June 30th Resolution and Order on page 11.

16. On November 14, 2023, LUMA submitted the FY2024 Q1 DR Administrative Costs Quarterly Report in compliance with the August 29th Order. *See Motion to Submit First Quarterly Report on Administrative Costs and Expenditures of TPP DR Programs* filed on November 14, 2023.

17. On November 29, 2023, the Energy Bureau issued a Resolution and Order ("November 29th Order") granting LUMA's request to extend the TPP by one year and delay the schedule for the Three-Year EE and DR Plan by one year. *See* November 29th Order on page 7. The Energy Bureau also ordered LUMA to file by December 8, 2023, a revised TPP with the information specified in the November 29th Order.

18. On November 29, 2023, LUMA submitted the FY2024 Q1 Quarterly TPP Report, in compliance with the February 16th Order. *See Motion to Submit FY2024 Q1 TPP Report* of that date.

19. On December 20, 2023, LUMA submitted to the Energy Bureau the revised version of the TPP ("Revised TPP") and the information requested under the November 29th Order.[4] *See Motion to Submit Revised TPP and Other Information Requested Under the Resolution and Order of November 29, 2023 filed on December 20, 2023 ("November 20th Motion")* and its Exhibit 1 *(which is the Revised TPP).* The Revised TPP maintained the same requirements pertaining to the TPP Quarterly Reports and TPP Annual Reports for FY2024, while extending these to FY2025, and added the DR Administrative Costs Quarterly Reports. *See id*. Exhibit 1, Section 6.0. The Revised TPP also updates the portfolio of quick-launch programs, adding to the existing programs

[4] The deadline to submit the revised TPP and other information required under the November 29th Order was extended by the Energy Bureau by Resolution and Order of December 12, 2023, in attention to a request for extension filed by LUMA on December 7, 2023 (*see Request for Extension to Comply with the Order for LUMA to Provide Information Under the Resolution and Order of November 29, 2023*, filed by LUMA on December 7, 2023).

a new Energy Efficiency Kit program to be quickly launched in Q3 of FY2024 and provide basic EE measures free of charge to a large number of customers. *See id.*

20. On February 14, 2024, LUMA submitted the FY2024 Q2 DR Administrative Costs Quarterly Report and requested the Energy Bureau to consolidate the DR Administrative Costs Quarterly Reports and the TPP Quarterly Reports into a single quarterly report to be filed within forty-five (45) days of the end of each fiscal quarter, commencing with the reports for Q3 FY2024 and to consolidate the DR Administrative Costs Year-end Reports and the TPP Annual Reports into a single annual report to be filed within one hundred and twenty (120) days following the end of the fiscal year, commencing with the annual report for FY2024. See *Motion to Submit Second Quarterly Report on Administrative Costs and Expenditures of TPP DR Programs and Request to Consolidate Reporting Requirements*.

21. On February 29, 2024, LUMA filed the FY2024 Q2 TPP Quarterly Report in compliance with the February 16th Order. *See Motion to Submit FY2024 Q1*[5] *TPP Report* filed on February 29, 2024.

22. On March 21, 2024, the Energy Bureau issued a Resolution and Order ("March 21st Order") granting LUMA's request to consolidate the TPP and DR Administrative Cost Quarterly Reports into a single filing ("Consolidated TPP and DR Administrative Cost Quarterly Report") to be filed within forty-five (45) days of the end of each quarter, beginning with FY2024 Q3 and file its annual DR Administrative Costs reports as part of its annual TPP reports one hundred and twenty (120) days following the end of the fiscal year. *See* March 21st Order on page 2. The Energy Bureau also clarified that "LUMA need not be limited by quarterly budgets and that LUMA is authorized to grow participation in the [CBES] beyond the budgeted level of 6,500 participants

[5] Please note that the title refers to Q1 instead of Q2 due to inadvertent error.

this fiscal year to utilize the full approved budget for this year". *See id*. at pages 2-3. The Energy Bureau further ordered LUMA to notify it "as soon as it foresees that it may be forced to limit participation in the program this fiscal year due to budget constraints, so that the Energy Bureau may consider the merits of expanding the program and its budget to maximize this resource for the summer of 2024". *See id*. at page 3.

23. On May 15, 2024, LUMA filed the FY2024 Q3 Consolidated TPP and DR Administrative Cost Quarterly Report in compliance with the February 16th Order, the August 29th Order and the March 21st Order. *See Motion to Submit FY2024 Q3 Consolidated Transition Period Plan and Demand Response Administrative Cost Quarterly Report, Inform on Processing of Energy Efficiency Rebates, and Request Confidential Treatment* filed on May 15, 2024.

24. On June 11, 2024, the Energy Bureau issued a Resolution and Order in the Permanent Rate Case approving the implementation of the EE charge to cover the EE program costs for FY2025.

III. Submission of FY2024 Q4 Consolidated TPP and DR Administrative Costs Report and Request for Template Approval

25. In compliance with the February 16th Order, the August 29th Order, and the March 21st Order, LUMA herein submits its FY2024 Q4 Consolidated TPP and DR Administrative Costs Quarterly Report. *See Exhibit 1*.

26. LUMA herein informs that it has revised the format that it has used in the past to file the TPP Quarterly Reports and the format used to file the Q3 Consolidated TPP and DR Administrative Cost Quarterly Report and developed a template that it proposes to use going forward for its Consolidated TPP and DR Administrative Costs Quarterly Reports. Since as of this date the honorable Energy Bureau has not yet established a template for the TPP Quarterly Reports (as was mentioned in the February 16th Order), LUMA respectfully requests the Energy Bureau to

consider the template used in the *Exhibit* 1 herein for approval as the established template for future filings. This template was organized to generally follow the order and substance of the requirements in Section 6.0 of the Revised TPP, with some adjustments to expand on certain TPP program requirements and/or separately address DR program details to address the requirements in the August 29th Order relating to DR program costs.

WHEREFORE, LUMA respectfully requests that the Energy Bureau (i) **take notice** of the aforementioned; (ii) **accept** the FY2024 Q4 Consolidated DR Administrative Costs and TPP Quarterly Report in *Exhibit 1* in compliance with the February 16th Order, as modified by the August 29th Order and further modified by the March 21st Order and **deem** LUMA in compliance with the FY2024 Q4 reporting requirements under such orders; and (iii) and consider and approve the template used for the FY2024 Q4 Consolidated DR Administrative Costs and TPP Quarterly Report in *Exhibit 1* herein as the template to be used for future Consolidated DR Administrative Costs and TPP Quarterly Reports.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of August 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 copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com, info@sesapr.org, bfrench@veic.org, shanson@veic.org, evand@sunrun.com, jordgraham@tesla.com, forest@cleanenergy.org, customerservice@sunnova.com, javrua@sesapr.org, pjcleanenergy@gmail.com, and mrios@arroyorioslaw.com.

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Exhibit 1

FY2024 Q4 Consolidated TPP and DR Administrative Costs Quarterly Report

Consolidated Transition Period Plan and Demand Response Administrative Costs

FY2024 Q4 Quarterly Report

NEPR-MI-2022-0001
AUGUST 13, 2024

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Consolidated Transition Period Plan and Demand Response Administrative Costs

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Executive Summary

LUMA is committed to working with the Puerto Rico Energy Bureau (“Energy Bureau”) in our mission to build a more reliable, and resilient energy system for the people of Puerto Rico. As the system operator, LUMA is responsible for, and fully committed, to helping to implement Puerto Rico’s public energy policy, including key customer initiatives such as Energy Efficiency (“EE”) and Demand Response (“DR”) Programs.

This quarterly report provides an update on LUMA’s Transition Period Plan (“TPP”) and comprises a portfolio of LUMA’s progress and achievements on customer EE and DR Programs. Through the TPP, LUMA has launched quick start EE and DR Programs and projects that raised customer awareness to energy efficiency and energy savings, both of which will directly contribute toward Puerto Rico’s energy consumption reduction targets established in the Puerto Rico Energy Transformation and RELIEF Act ("Act 57-2014").

The programs that promote energy efficiency and energy savings include:

- **Residential EE Kits:**
  - Program to provide basic EE measures free of charge to both residential and commercial customers.
  - Distributed **32,765** kits, bringing the year-to-date total to **41,826** kits.
  - Achieved **11,769 MWh** in FY2024 Q4, bringing the total year-to-date value to **16,606 MWh**, which surpasses the annual target by **246%.** The cost-effectiveness of this achievement is **$0.14** per kWh saved.
- **Home Efficiency Rebate Program**:
  - Providing a prescriptive incentive to customers purchasing energy-efficient equipment from a list of qualified measures, including air conditioners, solar and tankless water heaters, and refrigerators.
  - **1,141** applications were processed during FY2024 Q4, showcasing increased customer engagement and interest in energy-efficient upgrades.
  - Saved **1,317 MWh** in FY2024 Q4, bringing the total year-to-date value to **16,850 MWh**, reaching **12%** of the annual target with a cost-effectiveness of **$1.22** per kWh saved.
- **Business EE Kits**:
  - Ordered **62** kits
  - Strategies are being developed to enhance future engagement.
  - Recorded **71 MWh** in FY2024 Q4 and **0.94%** of the annual target, with a cost-effectiveness of **$0.02** per kWh saved.
- **Business EE Rebate Program**:
  - Offering incentives to businesses for eligible measures, such as efficient lighting, HVAC, and water heating equipment.
  - Launched guidelines with **17** eligible measures.
- **In-Store EE Discount Program**:
  - Providing a point-of-sale discount for eligible EE measures and geo-targeting of stores in low-income areas to provide low-income customers with greater access to EE opportunities.
  - Secured agreements with Home Depot.

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  - Plans for expansion in FY2025.
- **The Community Streetlight Initiative:**
  - In Q4, LUMA restored streetlighting, saved **298,433.04 kWh**, and repaired **10,915** lights.
- **The Customer Battery Energy Sharing ("CBES") Initiative**:
  - Targeting residential and commercial customers with behind the meter batteries and providing incentives for load shifting to batteries during DR event periods.
  - Received DOE grant to support increased participation and flexibility.
  - Achieved **18 MW** in peak demand savings.

LUMA is pleased to submit this Quarterly Report on the implementation of the TPP and the CBES Initiative's administrative costs which correspond to the fourth quarter of Fiscal Year 2024. The TPP EE/DR Report has been completed in accordance with the Energy Bureau Resolutions and Orders and the Regulation for EE, Regulation 9637, as adopted pursuant to Act 57-2014.

Regulatory Background

On June 1, 2022, LUMA submitted to the Energy Bureau the EE and DR Transition Period Plan ("2022 TPP")[1], which describes the various quick-start EE and DR Programs to be implemented by LUMA during a two-year transition period ending on June 30, 2024. By Resolution and Order of February 16, 2023 ("February 16, 2023 Resolution and Order") the Energy Bureau approved (with some modifications) the TPP. Subsequently, by Resolution and Order of November 29, 2023, the Energy Bureau approved the extension of the Approved TPP for an additional year. On December 20, 2023, LUMA prepared and submitted to the Energy Bureau a revised TPP ("Revised TPP"; as used hereinafter in this report, "TPP" refers to this revised TPP) updating the TPP Programs and extending them until June 2025.

This report encompasses the period from April 1 to June 30 of 2024 and is presented by LUMA in adherence to the requirements of the Energy Bureau's February 16, 2023, Resolution and Order to submit quarterly reporting on the reporting metrics set forth in Section 6 of the 2022 TPP, which requirements remained unchanged in the Revised TPP. In addition, this report has the purpose of complying with the requirements set forth in the Energy Bureau's Resolution and Order of August 29, 2023 ("August 29, 2023 Resolution and Order"), requiring LUMA to report quarterly on specified data regarding the administrative costs for the implementation of the CBES Initiative that forms part of the TPP. The Energy Bureau approved the consolidation of these two quarterly reporting requirements by Resolution and Order of March 21, 2024 ("March 21, 2024, Resolution and Order").

[1] *See Motion Submitting Proposed EE/DR Transition Period Plan* filed on June 21, 2022, in Case No. NEPR-MI-2021-0006, *In Re: Demand Response Plan Review, Implementation and Monitoring*, and its Exhibit 1.

1.0 Description of Implementation Progress

1.1 Summary of Program Implementation Experience and Progress

This section provides a high-level summary of the implementation experience and progress to date for each program and initiative. Table 1 summarizes the activities, achievements, and status of various programs under the TPP.

Table 1: Activities and Achievements for FY2024 Q4

TPP PROGRAM	INITIATIVES	DESCRIPTION AND EXPERIENCE	STATUS
Education and Outreach Sec. 4.2 of TPP	Stakeholder Outreach	Recurring participation in the webcast "Martes Informativo" with Dr. Power, where the CBES[2] and Business Rebate[3] Programs were discussed.	Completed
Education and Outreach Sec. 4.2 of TPP	Stakeholder Outreach	LUMA developed and published marketing materials for the implementation contractors, including marketing guidelines and an email template. These materials were provided to the contractors for use in their marketing efforts.	Completed

[2] "Episodio 234: Estatus de Programa Battery Emergency Demand Response (BEDR) en Puerto Rico" from the webcast series *Martes Informativo* with Dr. Power. Available at: https://www.youtube.com/live/Fndxs5RUCSI?si=2LoWBwtfavB19yiU.

[3] *"Episodio 237: Update de la Nueva Tarifa EV-TOU para Cargar EV's,"* from the webcast series *Martes Informativo* with Dr. Power. Available at: https://www.youtube.com/watch?v=-x2Y6Yr56W0.

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TPP PROGRAM	INITIATIVES	DESCRIPTION AND EXPERIENCE	STATUS
Education and Outreach Sec. 4.2 of TPP	Customer Education	A new landing page was launched for the Business Rebate Program, which includes sections on Business Rebates and EE Business Kits Programs. Additionally, a new Business Rebate Program Brochure was developed that includes cross-promotion with other programs. *See Figure 14*.	Completed
Education and Outreach Sec. 4.2 of TPP	Stakeholder Outreach	Promotional materials for the Residential and Business Rebate Programs were developed and printed, which have been subsequently included in the billing statements mailed to all LUMA customers in July Billing Cycle 2024.	Completed on July 2024
Residential Rebate Program Sec. 4.3 of TPP	Pilot Program	Provided customers with a financial incentive for purchasing and installing high-efficiency eligible equipment and appliances. Since the launch of the Program, 1,218 customers have participated and received reimbursements for qualifying measures in less than a full quarter of implementation.	Ongoing

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TPP PROGRAM	INITIATIVES	DESCRIPTION AND EXPERIENCE	STATUS
Business EE Rebates Sec. 4.7 of TPP	Pilot Program	Provided commercial customers with a financial incentive for purchasing and installing eligible equipment and appliances. Since its launch, the focus has been on increasing market awareness and educating potential customers about rebate availability through contractor and association networks. Additionally, direct outreach efforts have been made via email and direct mail to this customer segment. Initial FY2025 figures indicate that positive uptake from this customer class is a direct result of the transformation initiatives implemented during FY2024 Q4. These initiatives included targeted program enhancements and improvements designed to drive increased participation and benefits. To support these efforts and account for anticipated success, LUMA accrued funding[4] in anticipation of the program's positive outcomes. This approach was informed by the successful results observed with the Residential Rebate Program, which demonstrated the potential for similar achievements. The accrued funding was intended to facilitate expected reimbursements and ensure the sustainability of the Program.	Ongoing

[4] Refer to Section 4 of this report for further information.

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TPP PROGRAM	INITIATIVES	DESCRIPTION AND EXPERIENCE	STATUS
In-Store EE Discount Program Section 4.5 of TPP	Pilot Program	Offers customer point-of-sale ("POS") discounts on eligible products at participating retail stores. Initial Manufacturer's Memorandum of Understanding ("MOU") obtained for POS discount and reimbursement processes, continuing the growth of measure and brand availability for customers in store to secure energy management and saving measures. The program launched in July 2024 at ten (10) Home Depot locations across Puerto Rico, offering instant discounts when paying at the cash register on qualifying lighting products. Additional stores and regions will be added in FY2025, further expanding access and equity for customers throughout Puerto Rico.	Launched on July 2024
EE Kits Program Sec. 4.6 of TPP (Residential)	Pilot Program	LUMA provided free mail-order "kits" containing typical EE measures and educational materials. A total of 32,765 customers across Puerto Rico ordered these kits this quarter. Each round of kit distribution received immediate and full uptake, with all available kits being claimed within days of the Program's launch.	Ongoing
Business EE Kits Sec. 4.6 of TPP	Pilot Program	Commercial customers are provided with a free mail-order kit that includes typical EE measures and educational materials. Since the launch, LUMA has distributed 62 kits. To build on this, LUMA will implement additional strategies in FY2025 to enhance awareness and distribution, with the goal of increasing the reach and impact of this measure.	Ongoing
Street Light Conversion Program Sec. 4.8 of TPP	Street Light Conversion Program	This quarter, LUMA saved 298,433.04 kWh as a result of repairing 10,915 streetlights, demonstrating its commitment to looking at its work holistically, combining EE and infrastructure modernization.	Ongoing

1.2 Residential Energy Efficiency Kits Program

During FY2024 Q4, LUMA made significant progress in its Residential EE Kits Program, achieving milestones in distributing these kits to the public and enhancing accessibility, particularly for low-income customers.

Figure 1: Residential EE Kit Order Site[5]

[5] https://eekit.lumapr.com/default/welcome/

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Figure 2: Residential EE Kits offering products description

In April, LUMA successfully launched a second round of **8,080**[6] kits and shipped units to the general public. The high demand for these EE kits was evident as they were ordered online and ran out within **48 hours**. To increase awareness and accessibility, especially for low-income customers, LUMA developed a strategy to distribute kits through its Regional Customer Service Center offices.

In May, LUMA launched a third round, with **7,889 units shipped** to the general public, that ran out in seven **(7) days**. Additionally, LUMA allocated **1,400** units to be distributed through three Community-Based Organizations, which will be identified in early FY2025 Q1. This initiative is aimed at ensuring that these kits are effectively distributed to low-income customers, helping to ensure savings for them.

In June, LUMA successfully launched a fourth round of **6,686 units shipped** to the general public, which ran out in just **(3) three days**. Recognizing the ongoing demand, LUMA ordered a fifth round of **10,110** units to be distributed through seven (7) LUMA Regional Customer Service Center Offices. In total, **32,765** kits were distributed in FY2024 Q4. This continued effort reflects LUMA's commitment to expanding the reach and impact of its EE Kits Program.

Year-to-date, a total of **41,826** kits have been distributed. This total includes **9,061** units shipped in the first round of kits on FY2024 Q3, resulting in a significant monthly energy savings total of **16,581 MWh**[7],

[6] In the EE and DR Plan FY2024 Q3 Quarterly Report, LUMA stated that 8,500 kits would be available for online ordering in April. However, only 8,080 kits were shipped. The difference of 420 kits is attributed to duplicate orders and cancellations due to incomplete customer information.

[7] The total energy savings of 16,581 MWh were calculated by multiplying the number of distributed energy-efficient kits by the average energy savings per kit. Specifically, with 41,826 kits distributed and each saving approximately 0.396 MWh annually, the total savings amount to 16,581 MWh.

which is conservatively equivalent to the annual electricity[8] use of **3,454 homes**. These achievements reflect LUMA's dedication to promoting EE and ensuring that these valuable resources are accessible to a wider audience, with a particular focus on low-income customers and community-based organizations.

These achievements demonstrate LUMA's dedication to promoting EE and making these resources accessible to a broader audience, particularly targeting geographically diverse population, low-income customers, and community-based organizations.

1.3 Home Efficiency Rebate Program

During this final quarter of FY2024, LUMA made substantial progress in processing and reimbursing residential EE rebates, reflecting a growing interest in energy-saving equipment among customers.

In April, a total of **162** applications were successfully reimbursed. This initial progress laid a solid foundation for the months to follow.

During the month of May, a significant increase was observed with **428** applications reimbursed. This surge indicates a rising awareness and participation in the Residential Rebate Program, as more customers took advantage of the available incentives for eligible energy-efficient equipment.

By June, the number of applications reimbursed had grown to **551**, demonstrating increasing interest and continued success in promoting EE. Taken together the **growth rate of uptake for this program is averaging 196% month over month** – this is an indicator of the continued demand LUMA expects to see and support of the program in FY2025.

During the latest reporting period, LUMA served a substantial number of customers and processed a significant volume of applications. It issued a notable number of rebates, with the total expenditure reflecting a considerable investment in customer support. Some rebates remain to be processed and are being recorded as accruals. This highlights LUMA's ongoing dedication to effectively managing and delivering rebate programs, while also ensuring that funding set aside from FY24 is appropriately allocated to FY25 to cover these unprocessed rebates. See Table 2 below.

Table 2: Rebates Processed FY2024 Q4

CUSTOMERS SERVED	APPLICATIONS PROCESSED[9]	REBATES ISSUED	REBATES SPEND
1,360	1,141	1,178	$868,246

LUMA's Residential Rebate Program has seen a diverse range of measures installed. The data reflects various types of energy-efficient upgrades made during the period. For a detailed breakdown of the measures and their distribution, refer to Table 3 below.

[8] The average usage of a residential customer class is 400 kWh per month or 4,800 kWh per year.

[9] One application allows for more than one measure.

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Table 3: Measures Installed

MEASURE	QTY (#)	PERCENTAGE
Solar Water Heater	425	36.08%
Energy Star® Tankless Water Heater	11	0.93%
Energy Star® Refrigerator	87	7.39%
Energy Star® Freezer	15	1.27%
Mini-Split Air Conditioner	614	52.12%
Energy Star® Window Air Conditioner	26	2.21%
Total	**1178**	**100%**

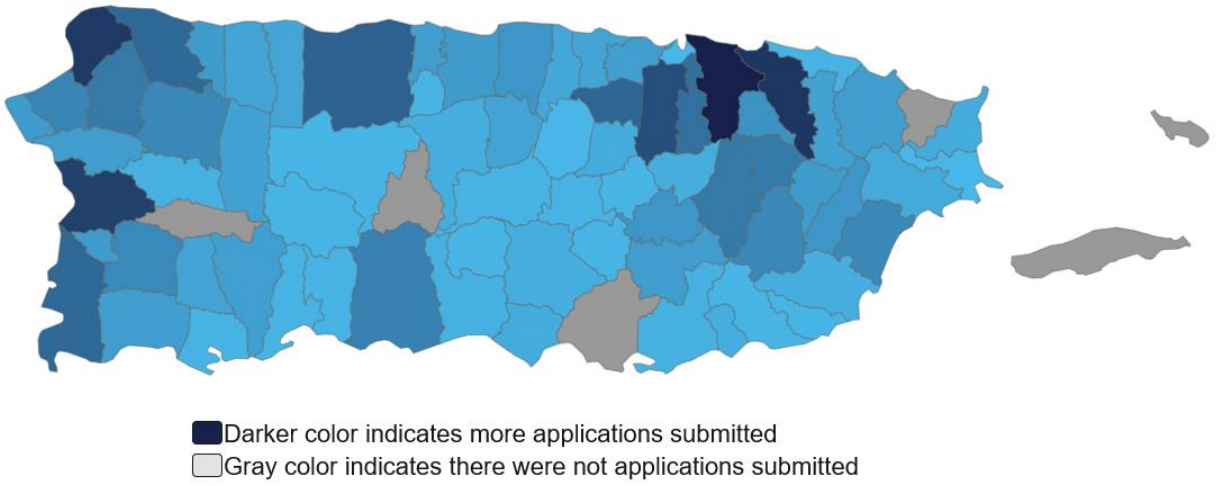

Figure 3: Geographic Distribution of Residential Energy Efficiency Measure Rebates

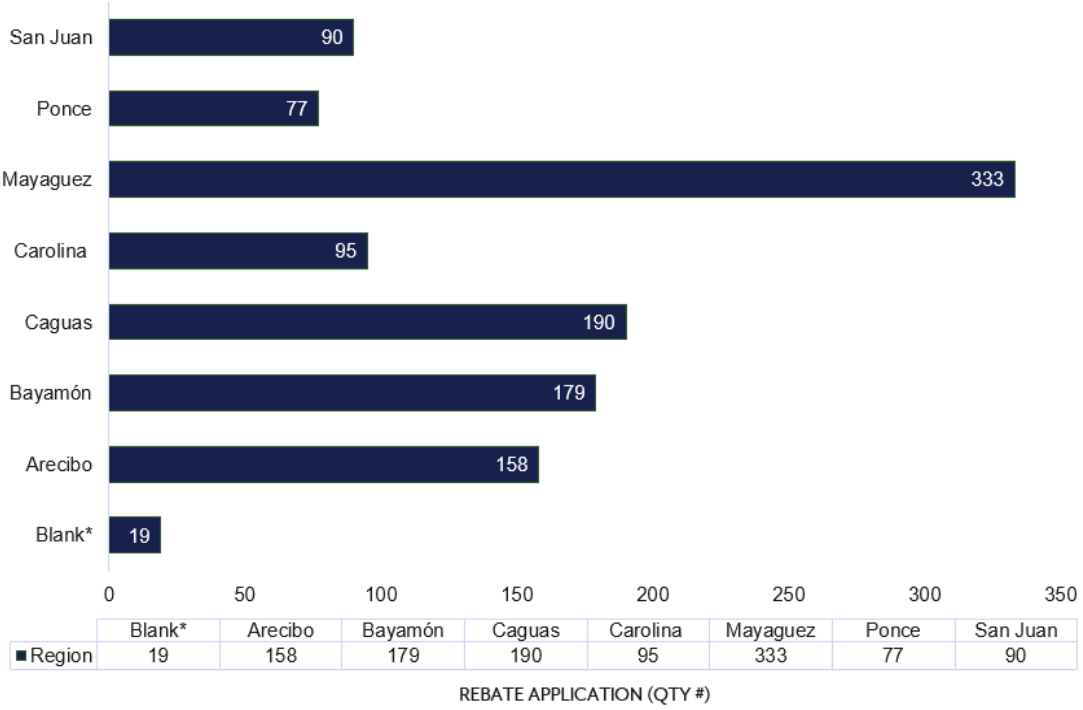

Figure 4: Distribution of Residential Energy Efficiency applications by region

1.4 Business Energy Efficiency Kits Programs

During FY2024 Q4, LUMA made notable strides with its Business EE Kits Program, that was designed to enhance EE across a range of business environments and operational settings. Given the fact that this customer class is significantly smaller than residential and that energy decisions are made with different motivations and timetables, LUMA is committed to improving education, outreach, and community-based market transformation in FY2025 driving an increased uptake in this free and cost-effective measure.

In late May, LUMA launched the Business EE Kits Program, distributing 6,000 kits tailored for **Retail, Restaurant, Office** or a **Lighting-only** kit alternative. Each kit came with a satisfaction survey postcard to collect feedback. This program supports small and medium enterprises (“PYMES”), crucial for Puerto Rico's economic development, by boosting their operational efficiency and promoting sustainability.

This initiative highlights LUMA's commitment to supporting PYMES, which are crucial to Puerto Rico's economic development. By providing tailored EE solutions, LUMA aims to enhance the operational efficiency of these businesses, contribute to cost savings, and promote sustainable growth within the local economy.

After a limited launch timeline in June, **62** kits had been ordered, with the Office Kit emerging as the most popular choice among businesses. Additionally, LUMA has allocated **600** kits for the Puerto Rico Chamber of Commerce (“the Chamber”) for distribution among its members. This collaboration is designed to amplify the Program's reach and impact, extending its benefits to a broader network of businesses. These joint efforts highlight LUMA's commitment to working with stakeholders to enhance the effectiveness and reach of its programs.

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LUMA's recent achievements reflect substantial progress in expanding its EE initiatives, particularly in supporting businesses with energy-saving practices. To launch the business-focused rebate program, LUMA utilized funds originally designated for the Residential EE Kits program.

By utilizing these funds, LUMA has effectively advanced its commitment to assisting businesses in implementing energy-saving practices and improving overall customer engagement. This approach underscores LUMA's dedication to broadening the impact of its EE initiatives and ensuring effective support for both residential and business customers.

Figure 5: Business EE Kits Order Site[10]

[10] https://eekitcomercial.lumapr.com/default/welcome/

Figure 6: Business EE Kits Survey Postcard

1.5 Business Energy Efficiency Rebates Program

During FY2024 Q4, LUMA made significant advancements in enhancing its Business EE Rebates Program and improving customer service and operational efficiency.

In April, the development of the Business EE Rebates Program Guidelines was completed. These guidelines set the framework for the program, outlining eligibility criteria and procedures to ensure clarity and consistency in processing rebates.

In May, LUMA officially launched the Business EE Rebate Program, which included **17** eligible measures. This comprehensive program offers a range of incentives designed to encourage businesses to implement energy-saving upgrades. Additionally, training sessions were conducted for all LUMA Customer Service representatives, equipping them with the necessary knowledge and tools to assist customers effectively.

By June, LUMA made further improvements by updating the rebate application to include auto-calculation features. This enhancement streamlines the application process, making it easier for businesses to apply for rebates and manage their EE projects.

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These steps reflect LUMA's commitment to supporting businesses in their EE efforts and continuously improving the accessibility and functionality of its rebate programs.

Figure 8: Beach Cities Solar Consulting on LUMA's LED Lighting Rebates

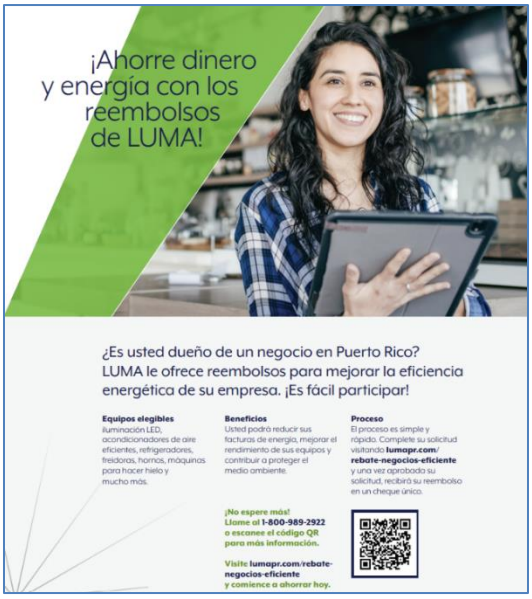

Figure 9: Business Rebates Website[11]

[11] https://lumapr.com/news/luma-introduces-innovative-energy-efficiency-rebate-program-in-puerto-rico/?lang=en

Table 4: Eligible Equipment for Rebates

ELIGIBLE EQUIPMENT	REBATE AMOUNT
Exit Sign	$10
Omni Directional LED Replacement	$10
LED Troffer Replacement	$25 - $30
Linear Fluorescent LED Replacement	$5 - $10
Occupancy Sensor	$20 per sensor
Fryer	$350
Convection Oven	$350
Combination Oven	$800
Ice Machine	$500
Solar Water Heater	$550
Commercial Refrigerator and Commercial Freezer	$100 each
Commercial Air Conditioning	Tier 1: $100 per ton Tier 2: $175 per ton
Ductless Split Air Conditioner	$750
Energy Star® Window Air Conditioner	$130
Chiller	Tier 1: $100 per ton Tier 2: $175 per ton
Window Film	$1 per square foot
Pool Pump Valuable Frequency Drive (“VFD”)	$200 per HP

1.6 In-Store Discounts Program

LUMA’s work in FY2024 Q4 for the In-Store Discounts Program centered around preparation and execution of necessary agreements with initial participating stores (Home Depot) and product manufacturers. The initial quick launch of this program will support lighting measures and work to expand to other measures in FY2025 as aligned to portfolio and market goals.

Figure 11: In-Store Discount Program

Lighting as a first launch measure is a very accessible and impactful approach, whereby most customers will have an opportunity to purchase it within a calendar year for their home or business needs.

Initial launch activity in FY2025 has shown promising uptake of anticipated measure spend and opportunities to cross promote other potential in-store discount measures or supporting EE Programs allowing customers to stack value and energy savings together.

1.7 Program and Implementation Strategies

Focus on Equity and Access

To ensure that LUMA's EE Programs are as equitable as possible, the incentives for low-income applicants are set at a higher level compared to those available to non-low-income participants. This approach is designed to address the specific needs and challenges faced by low-income households, providing them with greater financial support to access energy-saving resources.

Eligibility for the low-income incentives is determined based on the estimated combined yearly income and household information submitted by the applicant. This information is carefully reviewed to verify eligibility and ensure that the assistance is directed to those who most need it. By adjusting the incentive levels, LUMA aims to bridge the gap in EE access, helping to reduce the financial burden on low-income families and making it easier for them to implement energy-saving measures.

This tiered incentive structure is a key component of LUMA's commitment to promoting equity and inclusivity within its programs. It recognizes that financial constraints can significantly impact a household’s ability to invest in energy-efficient upgrades and seeks to provide additional support where it is needed most. Through this approach, LUMA not only fosters greater participation across diverse income groups but also contributes to broader community benefits by improving overall EE and reducing utility costs for vulnerable populations.

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Table 5: Contrast by Sector of Eligible Measures

ELIGIBLE MEASURE	NON-LOW-INCOME INCENTIVE	LOW-INCOME INCENTIVE
Solar Water Heater	$550	$775
Electric Tankless Water Heater	$60	$85
Energy Star® Refrigerator	$210	$280
Energy Star® Freezer	$210	$280
Energy Star® Air Conditioner – Window	$130	$175
Air Conditioner – Mini-Split	$750	$1,000

During FY2024 Q4, LUMA paid a total of **$277,196** in incentives specifically to low-income customers, representing **32%** of the FY2024 Q4 incentive spend for rebates, supporting a variety of energy-efficient upgrades. The distribution of these funds was reflected in the installation of **316** energy-saving measures for **287** low-income customers across different categories, see Table 6 below.

Table 6: Measures Installed for Low-Income Customers

MEASURE	QTY #
Solar Water Heater	78
Electric Tankless Water Heater	0
Energy Star® Refrigerator	16
Energy Star® Freezer	9
Energy Star® Air Conditioner – Window	13
Air Conditioner – Mini-Split	200
Total	**316**

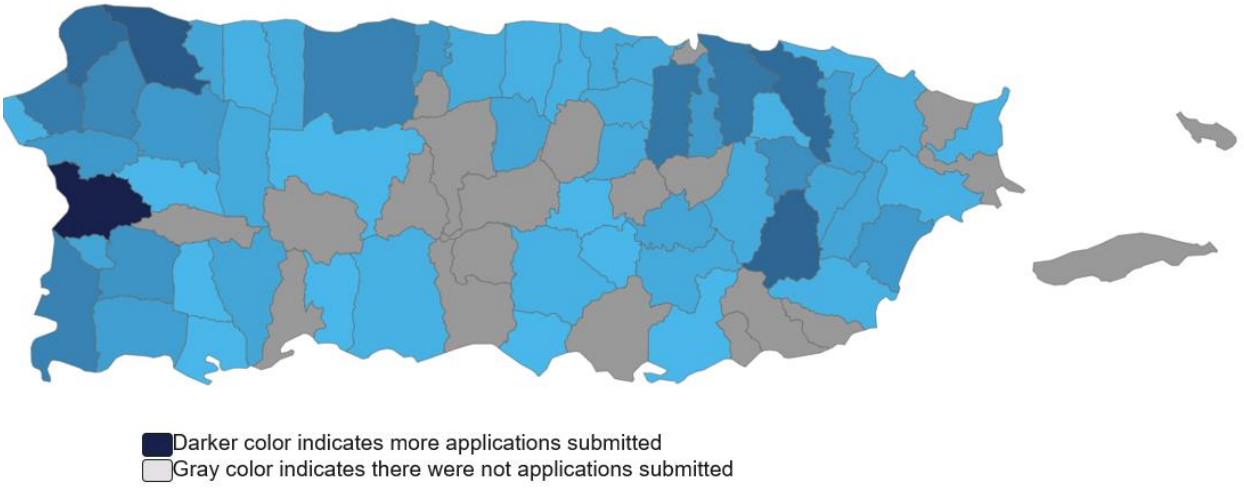

Figure 12: Geographic Distribution of Residential EE Measure Rebates for low-income customer

1.8 Funding Sources and Cost Recovery

LUMA is always exploring the potential to expand its program's reach and impact through additional funding sources such as the Department of Energy ("DOE") and the Central Office for Recovery, Reconstruction and Resiliency ("COR3") partnerships. Particularly, LUMA has been awarded funds to support its CBES program which will enable increased participation, testing and flexibility alongside currently budgeted funds for the pilot program.

Additionally, LUMA is actively engaged in discussions with key stakeholders, including the State Office of Public Energy Policy, Fortaleza, and the DOE. These discussions are vital for aligning efforts and ensuring comprehensive support for LUMA's initiatives. The collaboration with these entities is ongoing, with a dedication to fostering strong partnerships to advance its objectives.

2.0 Energy Efficiency Participants Enrolled and Installed Measures

2.1 Number of Participants in Energy Efficiency Programs

During FY2024 Q4, the number of participants enrolled in each of LUMA's EE programs is a testament to the growing interest and involvement in these initiatives. Table 2 presents the total number of participants who have enrolled or received the benefits of the EE programs to date, focusing on those programs where customers enroll to receive rebates or obtain other types of incentives.

Notably, the Residential Rebates Program processed **1,141** participants applications, reflecting a strong uptake among residential customers looking to benefit from energy-efficient upgrades. On the other hand, the Business Rebates Program had no participants this quarter, largely due to launching towards the end of the quarter. Time for market transformation and ultimately customer awareness will drive the adoption of the discounted measures - an area for continued investment and growth augmented with new, diverse, and increased outreach efforts.

The Residential EE Kits Program experienced significant participants' enrollment, with **32,765** customers receiving kits this quarter. This response highlights the program's effectiveness and popularity among residential customers. In contrast, the Business EE Kits Program had **62** participants, suggesting a more modest but steady interest from the business sector.

Energy savings across all sectors illustrate the significant impact of these initiatives. For instance, the Commercial, Industrial, and Agriculture ("C&I") sector, including both the Business EE Kits and Business Rebates Programs had energy savings of **71 MWh**. Additionally, the Residential Low-Income Sector achieved **302 MWh,** reaching **16%** of its annual target, and the Residential Non-Low-Income Sector surpassed its goal with **12,788 MWh**, exceeding the target by **130%.** Overall, the total energy savings for FY24 Q4 amounted to **13,157 MWh**, representing **55%** of the annual goal. These savings not only contribute to substantial cost reductions but also support broader economic growth and sustainability. See Table 9 for more information.

The total number of participants across these programs during the FY2024 Q4 quarter was **33,968** demonstrating the widespread impact of LUMA's EE initiatives.

Note that no information is provided on the In-Store Discount Program currently because it launched after the conclusion of FY2024 Q4, specifically in July 2024. As the Program commenced following the end of the fiscal year, there are no relevant data points or indicators available within the FY2024 Q4 reporting period. LUMA will include data and analysis for this Program in subsequent reports starting from FY2025 Q1 to ensure comprehensive and accurate representation of its impact and performance.

Table 7 below includes the number of participants enrolled or receiving benefits in the EE programs by program to date (limited to those programs where customer enrolled or received the rebates and/or incentives).

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Table 7: Number of participants enrolled or receiving incentives in each EE program during FY2024 Q4

PROGRAM	PARTICIPANTS FY2024 Q4
Residential Rebates	1,141
Low-Income	299
Non-Low-Income	842
Business Rebates	0
Residential EE Kits[12]	32,765
Business EE Kits	62
Total	**33,968**

Table 8 provides an overview of the installed measures by sector, segment, and program for FY2024 Q4. It details the types and quantities of energy-efficient measures implemented across different residential, commercial, and industrial segments.

Table 8: Installed Measures by Sector, Segment, and Program (FY2024 Q4)

SECTOR	SEGMENT	PROGRAM	INSTALLED MEASURE	QUANTITY
Residential	Single-Family Homes	Residential Rebate Program	Air Conditioners (Window / Mini-Split)	640
Residential	Single-Family Homes	Residential Rebate Program	Solar Water Heaters	425
Residential	Single-Family Homes	Residential Rebate Program	Tankless Water Heaters	11
Residential	Single-Family Homes	Residential Rebate Program	Refrigerators	87
Residential	Single-Family Homes	Residential Rebate Program	Energy Star Freezers	15

[12] A strategy was implemented to distribute 10,110 kits through seven LUMA Regional Customer Service Centers, specifically targeting low-income communities. It is estimated that a substantial portion of these kits were requested by customers from low-income households.

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SECTOR	SEGMENT	PROGRAM	INSTALLED MEASURE	QUANTITY
Residential	Single-Family Homes	EE Kits Program	LED Bulbs	196,590
Residential	Single-Family Homes	EE Kits Program	Advanced Power Strip	32,765
Residential	Single-Family Homes	EE Kits Program	LED Night Strip	32,765
Commercial	Small Business	Business EE Kit Program	Retail Kit	7
Commercial	Small Business	Business EE Kit Program	Office Kit	39
Commercial	Small Business	Business EE Kit Program	Restaurant Kit	10
Commercial	Small Business	Business EE Kit Program	Lighting Kit	9
Commercial	Small Businesses	Business Rebate Program	Efficient Lighting	0
Commercial	Small Businesses	Business Rebate Program	HVAC Units	0
Commercial	Small Businesses	Business Rebate Program	Water Heaters	0
Commercial	Small Business	Business Rebate Program	Refrigerators	0
Commercial	Small Business	Business Rebate Program	Cooking Equipment	0
Commercial	Small Business	Business Rebate Program	Window Films	0
Commercial	Small Business	Business Rebate Program	Pool Pump VFD	0

3.0 Energy Efficiency Performance

3.1 Energy and Peak Demand Savings by Sector

Table 9 includes the preliminary estimates of energy (MWh) and peak demand savings (MW) achieved during the Quarter for each sector and subsegment and as it relates to annual targets.

Table 9: Energy and Peak Demand Savings Performance by Market Sector and Subsegment

MARKET SECTOR	SUBSEGMENT	ANNUAL ENERGY SAVINGS TARGET (MWH)	FY24 Q4 ENERGY SAVINGS (MWH)	YTD ENERGY SAVINGS (MWH)	ACTUAL SAVINGS (%) OF ANNUAL TARGET	PEAK DEMAND SAVINGS TARGET (MW)	FY24 Q4 PEAK DEMAND SAVINGS (MW)	YTD PEAK DEMAND SAVINGS (MW)	ACTUAL PEAK DEMAND SAVINGS (%) ANNUAL TARGET
Residential Sector	Low-Income	1,896	298	302	16	4.4	0.61	0.61	13.86
Residential Sector	Non-Low-Income	13,771	12,788	17,885	130	6.8	2.34	3.16	46
Commercial, Industrial and Agriculture (C&I) Sector	Small Business	3,951	71	71	2	4.7	0.01	0.01	0.21
Commercial, Industrial and Agriculture (C&I) Sector	Other Commercial/Industrial and Agricultural Sector	13,600	0	0	0.0	0	0	0	0.00
Government/Public	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Portfolio Total		**33,218**	**13,157**	**18,258**	**55**	**15.9**	**2.96**	**3.78**	**23.77**

3.2 Energy and Peak Demand Savings by Program

Table 10 below provides the preliminary estimates of energy (MWh) and peak demand (MWh) savings achieved during the Quarter for each program and how these relate to annual targets.

Annual targets were established based on a 12-month operating period for achieving both energy savings and demand targets. However, delays in funding and other factors, such as the time required for procurement and contracting of a portfolio administrator, resulted in loss of operational time, which impacted the achievement of targets. Despite these barriers, LUMA's performance, when adjusted for these factors, exceeds annual targets in many categories.

Looking ahead, LUMA anticipates a full program year of operation will provide a clearer validation of its portfolio and program designs, confirming their effectiveness in meeting Puerto Rico's energy savings and peak demand reduction goals.

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Table 10: Energy and Peak Demand Savings Performance

PROGRAM	ANNUAL ENERGY SAVINGS TARGET (MWh)	FY24 Q4 ENERGY SAVINGS (MWh)	YTD ENERGY SAVINGS (kWh)	FY24 YTD ENERGY SAVINGS (%)	FY24 PEAK DEMAND SAVINGS TARGET (MW)	FY24 Q4 PEAK DEMAND SAVINGS (MW)	YTD PEAK DEMAND SAVINGS (MW)	FY24 YTD PEAK DEMAND SAVINGS (%)	Q4 FY24 SPEND ($)	YTD PROGRAM SPEND ($)	$/kWh [13]
Residential Rebates[14]	10,902	1,317	1,606,036	12	6.9	0.22	0.26	3.7	1,360,987	1,954,501	1.22
Residential EE Kits	4,765	11,769	16,580,906	246	4.4	2.73	3.51	80	2,384,873	2,384,873	0.14
Business Rebates	10,015	0	0	0	3.7	0	0.00	0.00	225,687	226,035	0
Business EE Kits	7,536	71	71,490	.94	0.9	0.01	0.01	1.11	162,540	162,540	0.02
Total	**33,218**	**13,157**	**18,258,432**	**55**	**15.9**	**2.96**	**3.78**	**23.77**	**4,134,087**	**4,727,949**	**0.26**

[13] The calculation of cost per kilowatt-hour ($/kWh) is based on the YTD program spend for FY24 divided by the YTD Energy Savings (kWh). This figure helps to gauge the cost-effectiveness of the program's investments in relation to the energy savings achieved.

[14] Total Actual Energy Savings for Residential Rebates and EE Kits reflect rebates disbursed and kits ordered and shipped to customers during the reporting period.

3.3 Customer Education and Outreach

Commercial Energy Efficiency Programs

During FY2024 Q4, LUMA made considerable progress in enhancing its outreach and promotion efforts for the EE, DR and related segment initiatives.

In April, LUMA launched a new landing page for the **Business Incentives Program**[15]. This updated online resource serves as a central hub for information on available incentives and how businesses can take advantage of them.

In May, LUMA developed a new **Business Efficiency Rebates Brochure**, which outlines rebate opportunities and cross-promotes other related programs. Additionally, **Contractor (Water heating, plumbing, and solar energy) Marketing Guidelines** were created to assist contractors in effective promotion of EE programs to customers and extending the Program's reach.

By June, several key activities were undertaken to boost the Program visibility and engagement:

- An **email campaign** was launched, targeting approximately **6,000** businesses. This campaign aimed to promote the availability of EE kits and rebate offers.
- LUMA met with the **Chamber** to advance the Business Rebates Program and Business EE Kits initiatives. As part of this effort, **600** kits were allocated for distribution among the Chamber members.
- A **promotional postcard** with a unique code was developed to highlight the Business EE Kits Program at various events.
- LUMA participated in the **Dr. Power YouTube webcast, "Martes Informativo",** where discussions included Electric Vehicles, Business Incentives, and the CBES program.
- A training session was conducted at **Glenn International's** facilities to promote the Business Rebates program among electrical contractors, with **35** to **50** contractors in attendance.

These outreach activities highlight LUMA's ongoing efforts to educate and engage with the public, making sure more individuals and businesses are aware of, and can benefit from, the available EE and DR Programs. For more details about Customer Outreach and Education efforts, see Appendix A.

3.4 Marketing Performance

Customer Feedback

The onsite feedback from LUMA customers regarding EE Programs has been largely positive. Customers have consistently expressed their appreciation through various interactions with LUMA's Customer Service team. Notably, several customers have shown significant gratitude for the complimentary kits provided through the EE programs. Additionally, some customers have taken steps to assist others, such as helping elderly family members and friends with kit orders, thereby broadening the Program's reach within their communities. This feedback indicates the effectiveness of LUMA's marketing efforts and underscores the value of its EE programs.

[15] https://lumapr.com/business-incentive-programs/?lang=en

Marketing Progress

Furthermore, website traffic saw a substantial increase, rising from approximately **34,427** views in FY2024 Q3 to **214,323** views on the LUMA website. This represents a significant growth of approximately **526%** and reflects the growing interest in LUMA's EE Programs. The increase in online engagement indicates that LUMA's digital resources are effectively reaching and informing a broader audience.

This positive feedback and notable surge in website traffic underscore the effectiveness of LUMA's marketing efforts and the significant value its programs bring to the community.

3.5 Stakeholder Consultations

LUMA's engagement with federal agencies, organizations, and programs has been a cornerstone of its EE and sustainability efforts. LUMA has actively sought collaboration with key federal agencies, including the DOE and the Environmental Protection Agency ("EPA"), to identify funding and support. These discussions have clarified eligibility requirements and streamlined application processes, allowing LUMA to leverage opportunities such as the EE and Conservation Block Grant Program and various Energy Star incentives. Additionally, consultations with the DOE's Office of Energy Efficiency and Renewable Energy ("EERE") have provided valuable technical assistance, helping LUMA refine project designs and align with best practices in EE. Collaborative initiatives with federal programs have also enabled LUMA to showcase innovative energy solutions and benefit from cutting-edge research and technologies.

Furthermore, LUMA has established biweekly meetings with the Department of Economic Development and Commerce ("DDEC"), facilitating coordinated efforts regarding the launch of EE kits for both organizations to launch their respective programs while addressing different customer sectors across the island, addressing challenges with engagement and market penetration, and ensuring alignment with broader economic development goals. Overall, these engagements have significantly advanced LUMA's projects, equipping the organization with the necessary resources and support to drive impactful change and enhance operational effectiveness.

3.6 Research Activities

LUMA, as part of its research efforts, is completing surveys with the recipients of the EE kits with the intent to learn more about their home energy consuming equipment. A survey is being included with each kit to learn about the type of home cooling and water heating equipment that each customer has in their home. In addition, LUMA is ranking the most popular EE pilot measures to provide feedback for the three-year plan.

On the CBES Program LUMA is outlining a consumer research plan to learn more about the participant overall pilot experience and gather applicable testimonials.

Key findings and analyses from the research

Due to the recent launch of the EE Programs, LUMA expects to have a larger and more significant amount of data to complete the analysis and draw appropriate conclusions in future quarterly reports and as a part of the inputs during the TPP implementation. As the research is still underway, LUMA currently does not have available data to report on the CBES pilot. Once the planning phase is complete and data

collection begins, it will be able to provide more detailed information and analysis on the pilot program's performance and impact.

3.7 Collaboration with Key Strategics Groups

LUMA has established a collaborative partnership with the Chamber to enhance the promotion of Business Rebates and EE Kits Programs. This collaboration leverages the Chamber's extensive network of **600** members, including various business organizations, to broaden the reach of LUMA's initiatives. The Chamber demonstrates a strong interest and enthusiasm for the Business Programs, recognizing them as beneficial for its diverse membership base. The Chamber utilizes multiple communication channels, such as email blasts, newsletters, social media, and events, which will be key in promoting LUMA's Programs.

As part of this collaboration, the Chamber's Marketing, Sales, and Member Service Director invited LUMA to participate in these communication avenues, including their Annual Energy Symposium, convention, and digital TV show. LUMA has committed to provide **600** business kits designated under a unique code[16] to the Chamber to support their outreach efforts.

This partnership aims to effectively disseminate information about LUMA's EE programs, increase community involvement, and ultimately promote EE efforts across Puerto Rico.

LUMA continued its Contractor Outreach initiatives, focusing on engaging local contractors specializing in solar water heating, HVAC, lighting, and appliance businesses. In FY2024 Q4, over **100** contractors were contacted to promote the Residential and Business Rebates Programs. The response from the contractors has been positive, with many expressing enthusiasms about these Programs and recognizing the benefits they offer to their customers.

Additionally, LUMA has maintained its ongoing engagement with local government agencies, including the DDEC and its Energy Policy Program ("EPP"). This collaboration has been instrumental in the creation and dissemination of educational materials and joint outreach efforts. Discussions around strategy and marketing research for EE and DR branding continue as the TPP is implemented and inputs are incorporated. By working closely with these agencies, LUMA ensures that its EE initiatives are well-supported and effectively communicated to a broader audience.

Together, these efforts reflect LUMA's commitment to strengthening relationships with key stakeholders and expanding the reach of its EE programs. The proactive outreach to these stakeholders and continued partnerships with government agencies are vital components in driving the successful implementation and adoption of energy-saving measures across Puerto Rico.

[16] An alphanumeric code stamped on a card, used to identify and track individual items or records uniquely.

3.8 LUMA's Community Streetlight Initiative (CSIS) Energy Savings

LUMA is poised to significantly enhance public safety and EE in Puerto Rico over the next three years with its ambitious plan to install **300,000** streetlights. This initiative will not only improve safety for residents but also boost EE across communities.

In the current quarter, LUMA has achieved EE savings of **298,433.04 kWh** and repaired nearly **10,915** streetlights, reflecting its commitment to maintaining and upgrading existing infrastructure.

The installation of new streetlights under the federally funded CSIS features next-generation LED lights. These LEDs are highly efficient, consuming approximately **65%** less energy and lasting four times longer than traditional streetlight bulbs. This upgrade represents a significant advancement in energy conservation and operational longevity.

With a total of **10,915** streetlights, the Community Streetlight Initiative is a vital part of LUMA's broader EE efforts. By replacing outdated streetlights with advanced LED technology, LUMA is paving the way for a safer, more sustainable future for Puerto Rico.

4.0 Energy Efficiency Program Costs

During this reporting period, LUMA has incurred costs associated with the launch and management of various pilot programs. These expenditures include funding for six types of Residential Rebates, the distribution of free Residential EE Kits, and the development of Business Rebates and Business Kits. Additional resources were dedicated to Education and Outreach initiatives, as well as to cross-cutting areas such as Planning, Administration, and Evaluation, covering professional services, salaries, and the ongoing assessment of implemented measures. For a detailed breakdown of costs for each EE Program, please refer to Table 11, which outlines expenditures for FY2024 Q4 and Year to Date.

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Table 11: EE Budget & Costs

PROGRAM[17]	COST FOR FY2024 Q4	FY24 YTD COSTS	TOTAL PROGRAM BUDGET FY2024 Q4	% OF TOTAL PROGRAM BUDGET
Residential Rebates	$1,403,917	$1,954,501	$4,218,750	46.33%
In-Store Discounts	$129,672	$129,672	$100,000	129.67%
Residential EE Kits	$1,764,873	$2,384,873	$676,700	352.43%
Business Rebates	$225,687	$226,035	$3,588,165	6.3%
Business EE Kits[18]	$162,540	$162,540	$630,585	25.77%
Education & Outreach	$224,748	$632,071	$1,125,000	56.18%
Cross-Cutting Planning, Administration & Evaluation Costs	$128,143	$228,741	$1,125,000	20.33%
Total Portfolio	**$4,039,577**	**$5,718,433**	**$11,464,200**	**49.88%**

Business Incentive Program

In the Motion in Compliance with Resolution and Order of June 21, 2024[19], LUMA initially reported a total of **$1,055,801.50** for processing business rebates. This amount was made based on the successful performance of the residential rebates program, which had demonstrated significant uptake. Specifically, between FY2024 Q3 and Q4, the residential rebates program processed approximately $2 million in reimbursements, reflecting a strong demand and successful engagement from residential customers.

[17] The programs include PP&A costs as well.

[18] The $630,585 budget for Business EE Kits was reallocated from the Business Rebates Program budget, as the Business EE Kits were not included in the original budget plan.

[19] *See Motion in Compliance with Resolution and Order of June 21, 2024*, p.6.

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Encouraged by this success, LUMA anticipated a similar positive response from the Business Rebates Program towards the end of FY2024 and the beginning of FY2025. To ensure efficient processing and accommodate the expected surge in business rebate applications, LUMA designated **$1,055,801.50** to a pre-fund account.[20]

It is standard utility to deposit EE programs' incentive funds into a joint bank account with their program administrators before the incentive payments are distributed to customers. The primary objective of this "pre-fund" is to streamline and expedite incentive payments to customers, ensuring that funds are readily available for immediate disbursement once a customer rebate claim is approved.

As the quarter progressed, the forecasted surge in rebate applications did not materialize as expected. As a result, the actual expenditure on rebates totaled **$225,687**, reflecting the amount spent from the initially forecasted **$1,055,801.50**.

Shifts in funds between programs

Given the limited amount of time that the programs have been available, LUMA considers it is too early to determine any future reallocation of funds between programs. One exception to this observation is related to the In-Store Discounts initiative, which reflected overspending early in the development process. Please refer to Table 11 for more information.

Managing Budget Variations Above 20 Percent

As shown in Table 11, most of the costs incurred for each program during this period reflect significant underspending due to the implementation of the programs later the fiscal year. For example, the launch of the solar water heater rebates started in January and the other five residential measures available started in March.

As stated in the FY2024 Q3 Report, the Residential EE Kits Program shows a significant deviation in incurred costs due to the decision to ship a higher number of kits to customers. The decision to increase the number of kits to be sent was made due to the quick speed of implementation and the positive response from customers during previous launches. The kits proved to be an effective way to increase energy awareness and achieve savings.

The In-store Discounts initiative reflects early overspending for this reporting period. This was a strategic decision by LUMA to utilize the FY2024 budget and ensure a fresh budget for FY2025. The development costs for the initiative were higher than initially planned, and administrative costs associated with launching the initiative in July were included in this expenditure. Once this initiative is fully deployed, budget numbers will be reviewed to reflect the spending amount for the remainder of FY2025.

Business Rebates show the lowest underspent figure due to the partial reallocation of these funds to the Business EE Kits initiative and the launch of the measures in March 2024. The overall budgeted costs

[20] It is common practice among utilities to deposit energy efficiency program incentive funds into a joint account with their program administrators before the incentive payments are distributed to customers. The primary aim of this "pre-fund account" is to streamline and expedite incentive payments to customers, ensuring that funds are readily available for immediate disbursement once a customer rebate claim is approved.

between both Business EE Kits and Business Rebates add up to the original budget intended for Business Rebates.

At a portfolio level the total costs incurred for the execution of the programs were lower than the budgeted amount because most of the programs were deployed halfway through the fiscal year.

5.0 Demand Response Programs

In compliance with the August 29, 2023, Resolution and Order, as well as the reporting requirements outlined in the Revised Transition Period Plan submitted on December 20, 2023, this section of the report details the DR administrative costs. It presents the actual receipts for both the quarterly and fiscal-year-to-date periods, compared to the budgeted inflows from the Power Purchase Charge Adjustment ("PPCA"), and reflects the current fund balance.

The report includes a summary of program information indicators for the same periods, aligning them with the assumptions used in the August 23rd Filing and highlighting any significant variances from the approved budget. Additionally, it outlines the quarterly and fiscal-year-to-date expenditures for the DR program, broken down by line items, and details any discrepancies from the approved budget.

This overview is essential for assessing fund management, withdrawals, and outstanding balances. It also addresses any material variances greater than 10%, providing explanations to ensure transparency and facilitate effective oversight by the Energy Bureau.

5.1 Demand Response: Customer Battery Energy Sharing Pilot Program

During FY2024 Q4, significant progress was made in expanding customer participation and enhancing the capacity of the DR program.

In April, **393** new customers enrolled in the program. This initial growth set the stage for continued expansion throughout the quarter. By May, enrollment increased further with an additional **450** new customers joining. During May, **20** response events were conducted, achieving a robust participation rate between **89%** and **93%**.

June marked a notable surge in enrollment, with **1,073** new customers joining the program. This brought the cumulative total of enrolled customers to **5,726** for FY2024.

Total enrolled capacity of batteries in the program is **38 MW**; of which the program saw **18 MW** consistently available for Emergency DR Events, indicating capability to manage and respond to demand fluctuations on the grid by adjusting the energy supply during supply shortages.

Overall, these achievements reflect progress in increasing customer engagement and strengthening the Program's capacity to handle emergency DR scenarios.

5.1 Demand Response Participants

Table 12 below includes the number of participants enrolled in the CBES Pilot to date by program and sector/segment and total MW enrolled.

Although customer enrollment in the CBES Program has shown positive increases, the available capacity per DR event is lower than the enrolled capacity. Reports indicate that the year-to-date enrolled capacity is **38 MW** per DR event, while the real available capacity as reported by aggregators is **18 MW**.

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Table 12: Number of participants and total MW available in each DR program during the FY2024 Q4 quarter

SECTOR	SEGMENT	PROGRAM	INCREMENTAL PARTICIPANTS ENROLLED (FY24 Q4)	TOTAL PARTICIPANTS ENROLLED (YTD)	TOTAL MW AVAILABLE (YTD)*	TOTAL MW ENROLLED (YTD)
Residential	Residential Housing	Customer Battery Energy Sharing	1,882	5,652	17.6	37
Commercial	Small Business	Customer Battery Energy Sharing	34	74	0.4	1
Total			**1,916**	**5,726**	**18**	**38**

5.2 Program Administrative Costs

Funds were allocated primarily to enhance the program's capacity to manage DR events. In accordance with the March 21 Resolution and Order, which permits LUMA to exceed quarterly budgets and expand participation in the battery emergency DR program, these expenditures were strategically invested in several key areas.

A significant portion of the PPCA funds was dedicated to increasing customer participation, which saw substantial growth with **1,073** new customers enrolling in June, raising the total to **5,726** by the end of FY2024 Q4. This expansion was essential for boosting the overall capacity available during DR events.

Moreover, the PPCA funds were primarily allocated to increase program participation during FY2024 Q4. This approach aimed to fully utilize the available budget to maximize participant numbers before the fiscal year ended. Tracking performance indicators, such as customer response rates and battery performance, was part of this effort to gather crucial insights for refining strategies and improving program outcomes. These investments were aligned with the goals of the Resolution and Order, ensuring effective use of the authorized flexibility while staying within the approved budget.

Table 13: DR YTD Performance Indicators

PROGRAM PARAMETERS	YTD FORECAST (A)	YTD ACTUAL (B)	VARIANCE BETWEEN YTD FORECAST AND ACTUAL YTD (A-B)
Enrolled Customers (#)	6,500	5,726	774

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PROGRAM PARAMETERS	YTD FORECAST (A)	YTD ACTUAL (B)	VARIANCE BETWEEN YTD FORECAST AND ACTUAL YTD (A-B)
Enrolled Load (kW)	31,353	38,283	(6,930)
Average Battery Capacity (kWh/battery)	13	11	2
Average Battery Reserve (%)	50%	31	19
Average Impacts per Event (kW)	28,878	11,723	17,155
Aggregate Seasonal/Annual Impacts (kW)	26,724	11,074	15,650
Impacts as % of Enrolled Load	92.1	30.6	62
Average Event Response (%)	90	86.8	3
Average Event Duration (Hours)	2	2	0
Events (#)	50	53	(3)
Capacity per Event (kW)	26,186	18,444	7,742

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PROGRAM PARAMETERS	YTD FORECAST (A)	YTD ACTUAL (B)	VARIANCE BETWEEN YTD FORECAST AND ACTUAL YTD (A-B)
Estimated Energy per Event (kWh)	68,130	37,668	30,462
Total Energy Delivered (kWh)	2,990,226	1,173,720	1,816,506
Incentive Payments ($)	3,737,783	1,467,150	2,270,633
Administrative Costs ($)	763,771	2,430,789	(1,667,018)
Total program costs ($)	**4,501,554**	**2,430,789**	**2,070,765**

Understanding Demand Response Variances[21]

Significant variances in the program indicators, as illustrated in Table 13, have arisen due to discrepancies between initial program estimates and actual performance. The original estimates assumed that customer enrollment would increase in a linear fashion, leading to a proportional rise in both available capacity and energy per DR event. This model anticipated that as more customers enrolled, the program would naturally experience greater capacity and energy availability during each event, thereby allowing for higher incentive payments.

However, data received from aggregators revealed that the actual available capacity and energy were lower than initially projected. This variance is primarily due to fluctuations in customer participation and changes in their battery reserves. Specifically, customer engagement in DR events did not align with the expected linear increase. Additionally, variations in the amount of energy stored in customer batteries resulted in less available energy than initially forecasted.

As a consequence of these factors, the total amount of incentive payments per DR event has decreased. Initially, it was expected that incentive payments would increase in line with the growing capacity and energy availability. However, the reduction in actual available capacity and energy has led to lower incentive payments per event than anticipated, reflecting the gap between the forecasted and actual program performance.

[21] *See Resolution and Order of August 29, 2023,* p. 3, which specifies that quarterly reports must include explanations for any significant variances exceeding 10%.

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Table 14 below provides the costs to date of the CBES Pilot during the Quarter broken down by category.

Table 14: DR Budget and Costs

CATEGORIES	TOTAL PROGRAM BUDGET FY2024 Q4	COSTS FOR FY2024 Q4
Program Management	$363,771	$96,727
System Operations	0	0
Customer Service	0	0
Professional Services	$200,000	$1,865,482
Program Evaluation	$200,000	0
Other Expenses	0	$7,827
Total	**$763,771**	**$1,970,036**

5.3 CBES Performance for FY2024 Q4

In FY2024 Q4, LUMA has been closely monitoring key performance indicators to evaluate the effectiveness of the program, as detailed in Table 15. This includes tracking the number of enrolled customers, the power and energy enrolled per event, and the total number of events dispatched. By analyzing these indicators—such as the average customer response rate and the average battery power and energy dispatched per event—LUMA aims to gain insights into program performance. This data helps in assessing the program's benefits and guiding future improvements to enhance customer engagement and operational efficiency.

Table 15: Demand Response Performance Values

PERFORMANCE	FY2024 Q4
Enrolled Customers (#)	1,916
Enrolled Power per Event (MW)	12
Enrolled Energy per Event (MWh)	31
Events Dispatched (#)	46

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PERFORMANCE	FY2024 Q4
Average Customer Response (%)	87
Average Dispatched Battery Power per Event (MW)	18
Average Dispatched Battery Energy per Event (MWh)	38
Peak Demand Savings Target (MW)	26.2
Peak Demand Savings (MW)	18
YTD Peak Demand Savings (%)	68.70
Costs ($)	**$1,970,036**

CBES Quarterly and Fiscal-Year-to-Date PPCA Fund Inflows and Balances Comparison

The following table provides an overview of LUMA's financial performance by comparing the actual fund inflows received against the budgeted inflows specified in the PPCA. It also includes the fiscal-year-to-date actual fund balance, offering a clear view of how actual receipts align with the planned budget and how they impact the overall fund balance for the year. This detailed comparison helps assess the accuracy of budgeting, identify any discrepancies, and ensure that financial operations are in line with the August 29th Resolution and Order requirements.

Table 16: FY24 CBES Costs and PPCA Fund Overview

CBES FY24 Q4 COSTS	CBES YTD COSTS	ESTIMATED BUDGET INFLOWS FOR CBES FROM THE PPCA	PPCA FISCAL YTD ACTUAL FUND BALANCE
$1,970,036	$2,430,789	$2,996,013.82	$13,346,652.95[22]

[22] This balance is based on preliminary data as updated inflows will be reported on Case No. NEPR-MI-2020-0001.

6.0 Transition Period Plan Conclusions and Recommendations for FY2024 Q4

6.1 Customer Battery Energy Sharing – Pilot Analysis & Growth

The CBES Program has shown potential in enhancing grid stability and optimizing energy consumption through effective DR strategies.

Analysis & Observation

In the most recent quarterly performance analysis, LUMA observed a trend where the battery capacity utilized per event did not increase proportionately to the rising number of customers enrolled in the CBES Program. For FY2024 Q4, the analysis revealed that the actual capacity realized per event ranged from 9 to 12.6 MW, with typical events lasting around two (2) hours.

This behavior may be influenced by a range of factors but provides a clearer understanding of consumer behavior, which could be addressed through program design adjustments. In addition, achieving an actual capacity of approximately 20MW is an aspirational goal of the CBES Pilot, as it represents the offset of a generating unit not required to bridge any shortfall in capacity.

To address this barrier and further the Program's objectives, LUMA intends to exceed the original enrollment target, given the following key justifications:

Growth in Battery Capacity Utilization

Despite the steady rise in customer participation, the battery capacity utilized per event has shown an initial plateau. This suggests that the current customer base alone cannot drive growth in battery capacity deployment, which seeks to offset deficits in generation and offset emergency generation and load shed events. Increasing the number of participants will enable the CBES Pilot to provide a larger pool of battery resources and available capacity, to further maintain grid reliability.

A larger customer base will help to facilitate more comprehensive and varied analysis of customer behavior and response patterns within the CBES Pilot. Understanding these patterns is crucial for refining and optimizing LUMA’s demand management and response strategies in the future.

Opportunities for Commercial Sector Engagement

In alignment with the TPP, LUMA recognizes the potential to enhance the Program by including additional customer types in future phases. Currently, the residential sector, with 5,652 participants, provides 17.6 MW of capacity, while the commercial sector, with 74 participants, contributes 0.4 MW. This data highlights an opportunity to explore greater engagement with the commercial sector, which typically has larger battery capacities and distinct usage patterns.

Expanding participation in this sector has offered LUMA valuable insights and additional options for leveraging these resources but also support economic development by enhancing business operations.

Such an expansion aims to boost the program's overall capacity during DR events, helping to address generation deficits and reduce the reliance on emergency generation.

The commercial sector typically has larger battery capacities and different usage patterns compared to residential customers. This further engagement will significantly boost the capacity available during DR events, helping address deficits in generation and offset emergency generation needs.

Enhanced Data Collection for Demand Response Test Events

With more customers enrolled, the CBES Pilot can also conduct more varied and robust testing. As the goal of the CBES Pilot is to ensure both short-term impacts and long-term reliability across various scenarios, this testing is crucial for establishing LUMA's residential battery resources as a dependable and permanent asset.

The anticipated increase in enrollment is not currently modeled to exceed the budget for the CBES Pilot, as allocated by PREB for FY2025. Should LUMA anticipate a need to exceed this FY2025 budget, it will promptly notify the Energy Bureau.

6.2 Strategic Partnerships

Strategic partnerships, such as those with Home Depot for the EE Kits Program, have proven to be instrumental in expanding program visibility and accessibility. Strengthening these partnerships and exploring new collaborations can further enhance reach and impact. For the CBES program, collaborating with battery manufacturers and technology providers could improve program efficiency and customer satisfaction.

6.3 Business Rebate Program Launch

LUMA’s main observation has been regarding how Business Rebates have been slower compared to Residential Rebates. LUMA is implementing targeted strategies to boost awareness among business groups and individual owners. These strategies include tailored outreach campaigns and informational sessions designed to highlight the benefits of the Business Rebates Program and encourage greater participation.

6.4 Next Steps

In July 2024, LUMA issued a press release to inform the media about its existing EE Programs available for residential and business customers. The campaign included a substantial media push, featuring interviews and segments across major channels with broad reach, such as Tele11, Radio Isla, and Telemundo. By leveraging these high-visibility platforms, LUMA aimed to maximize its outreach and engage multiple market segments effectively. This broad-based media strategy not only increased the visibility of the EE programs but also provided valuable information to a diverse audience, enhancing overall program participation and impact.

During the same month, LUMA launched Stage 1 of the In-Store EE Discount Program. This initiative offers discounts on energy-efficient products directly in stores, making it easier for consumers to purchase

and use energy-saving devices. LUMA is working to include additional in-store discounts for other types of measures and expand these discounts to other stores across Puerto Rico.

LUMA will also continue its Contractor Outreach efforts, engaging local contractors to promote the Home and Business Rebates Program. By encouraging contractors to actively inform their customers about available rebates for energy efficient upgrades, LUMA aims to boost program participation.

To further its commitment to Education and Outreach, LUMA will initiate an EE Education Program tailored to students in Puerto Rico schools. This program aims to enhance awareness and practices in EE across public and private schools throughout the island. Comprehensive educational materials will be developed to support this program, scheduled to be launched in FY2025.

LUMA will maintain its involvement in industry events, such as those organized by the Solar and Energy Storage Association of Puerto Rico (“SESA”), and with trade media to promote the EE and DR Programs. Furthermore, LUMA will seek opportunities to participate in additional events to broaden its outreach and engage with a wider audience.

7.0 Appendix A: Customer Education & Outreach Materials

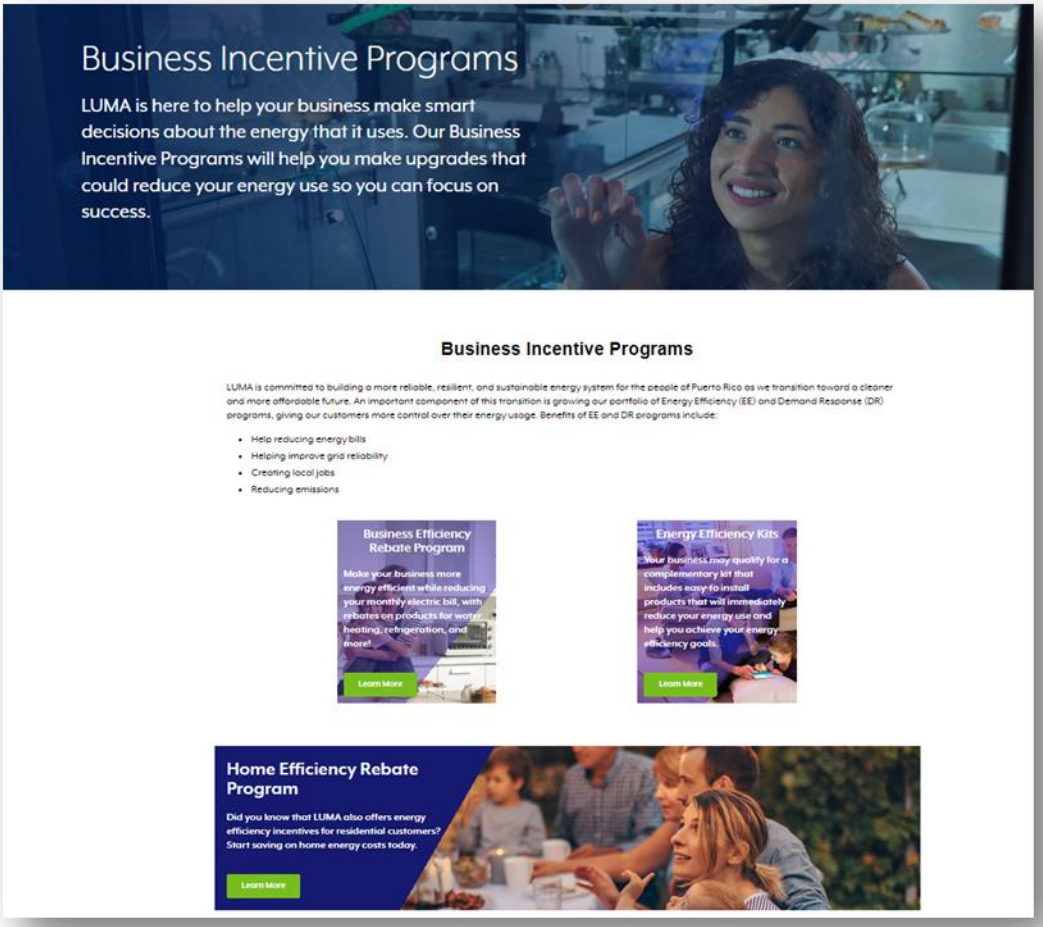

Figure 13: Business Incentive Program New Landing Page[23]

[23] https://lumapr.com/business-incentive-programs/?lang=en

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Figure 14: Business Rebate Brochure

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Figure 15: Postcard – Business EE Kits Program

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Figure 16: Contractor Marketing Guidelines

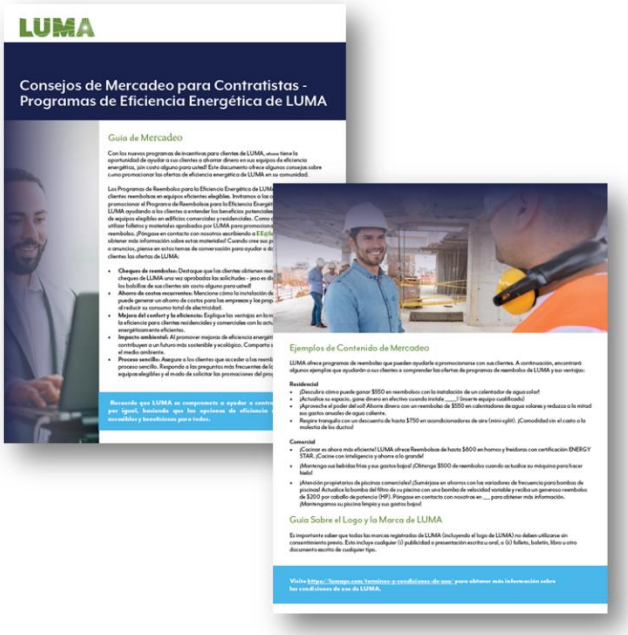

Figure 17: Business Email Campaign

Figure 18: YouTube Webcast "Martes Informativo"