

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

IN RE:

**LUMA’S ACCELERATED STORAGE
ADDITION PROGRAM**

CASE NO. NEPR-MI-2024-0002

**SUBJECT: Request for Extension of Time to
Comply with Resolution and Order Issued on
August 8, 2024**

NEPR

Received:

Aug 13, 2024

5:45 PM

**REQUEST FOR EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND
ORDER ISSUED ON AUGUST 8, 2024**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On April 19, 2024, the Energy Bureau issued a Resolution and Order (“April 19th Order”) opening the instant docket for the evaluation of LUMA’s Accelerated Storage Addition Program (“ASAP”) which proposes the addition of Battery Energy Storage Systems (“BESS”) at existing generation facilities (a preliminary description of which had been submitted by LUMA to the Energy Bureau in Case No. NEPR-MI-2021-0002¹) and ordering LUMA to submit a final version of the ASAP concept within five (5) business days from the notification of the Resolution and Order.

2. On April 26, 2024, LUMA filed a *Motion to Submit ASAP Structure and Concept in Compliance with Resolution and Order issued on April 19, 2024 and Request for Determination*

¹ See LUMA’s Motion to Submit Information on Accelerated Storage Addition Program in Compliance with Resolution and Order of November 30, 2023 and of December 11, 2023 and Request for Energy Bureau to Open a Separate Docket for the Evaluation of this Program, filed on December 21, 2023 in Case No. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan-December 2020*.

of Consistency with Energy Public Policy and IRP in which it submitted the final version of the ASAP concept, explained that ASAP had generated interest among Independent Power Producers (“IPP”), and requested the Energy Bureau confirmation to proceed with the development of a proposed Standard Offer Agreement with IPPs to add BESS at their facilities, estimating that these could be developed by May 2024 and possibly executed near the third quarter of 2024.

3. On May 8, 2024, the Energy Bureau issued a Resolution and Order determining that ASAP was aligned with Puerto Rico’s energy public policy and authorized LUMA and IPPs to proceed with the development of the Standard Offer Agreements.

4. On August 8, 2024, the Energy Bureau issued a Resolution and Order (“August 8th Order”) ordering LUMA to, within five (5) business days from the notification of the Resolution and Order, file with the Energy Bureau the Standard Offer agreements or provide a detailed status update.

5. LUMA herein informs that it is in the process of preparing a detailed status update to comply with the August 8th Order. However, Monday, August 13, 2024 (two working days into this process), LUMA had to activate its *Emergency Operations Center* (LEOC) in compliance with LUMA’s Emergency Response Plan to prepare for the imminent passage of Tropical Storm Ernesto. Tropical Storm Ernesto is expected to bring potential heavy rains, strong winds and flash flooding across Puerto Rico starting on the night of Tuesday August 13th and into Wednesday, August 14th.

6. Preparing for Tropical Storm Ernesto requires the engagement of many key personnel and components of LUMA’s organization, including LUMA’s personnel in charge of preparing, reviewing and approving the status report required in compliance with the August 8th Order. LUMA expects that response efforts will continue this week and in the coming weeks,

depending on the magnitude of the impact of Tropical Storm Ernesto in Puerto Rico and the electric power grid.

7. Given the aforementioned urgent and unforeseeable circumstance, it is not possible for LUMA to complete its status update report by August 15, 2024. At this time, LUMA expects to be in a position to file a response and comply with the August 8th Order within the next fourteen (14) days- that is, on or before August 29, 2024. This proposed timeline is based on LUMA's good faith estimation of the time that may be needed to normalize operations after the passage of Tropical Storm Edward so that its personnel can retake their regular duties. If additional time is needed, LUMA will timely advise this Energy Bureau.

8. This additional time will allow LUMA personnel to finalize their duties in LEOC operations, return to their non-emergency duties and be in position to finalize the status update to comply with the August 8th Order for submission with this Energy Bureau.

9. LUMA restates its commitment to comply with the August 8th Order of this Honorable Energy Bureau.

WHEREFORE, LUMA respectfully requests the Energy Bureau to take notice of the aforementioned and grant LUMA until August 29, 2024, to comply with the August 8th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of August 2024.

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau.



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