

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

**NEPR**

**Received:**

**Sep 5, 2024**

**10:04 PM**

**IN RE: ELECTRIC VEHICLE  
CHARGING INFRASTRUCTURE  
DEPLOYMENT**

**CASE NO. NEPR-MI-2021-0013**

**SUBJECT: Motion to Submit Responses to Request of  
Information in Energy Bureau Order of August 26, 2024**

**MOTION TO SUBMIT RESPONSES TO REQUEST OF INFORMATION IN ENERGY  
BUREAU ORDER OF AUGUST 26, 2024**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

COME now **LUMA Energy, LLC and LUMA Energy ServCo, LLC** (collectively, “LUMA”), through the undersigned legal counsel, and respectfully states, submits and requests the following:

**I. Introduction**

Since April 30, 2024, LUMA has been implementing the Interim Electric Vehicle Time of Use Pilot Program (“Interim EV-TOU Pilot Program”) to encourage the adoption of electric vehicles in Puerto Rico, encourage off-peak electricity consumption, reduce strain on the electricity grid during peak demand periods, and gain insights to address barriers to adoption. Through this program, LUMA aims to gain insights to help inform and identify the necessary modifications to the Interim EV-TOU Pilot Program and the level of interest and engagement by targeted customers, as well information that will help shape the policies and technological solutions necessary to deploy it to a larger customer base in the future.

After program launch, LUMA identified limitations in the current technology that may prevent participation in the program by some customers. In particular, LUMA identified billing

configuration limitations within the Customer Care & Billing (“CC&B”) system that prevent the simultaneous participation of General Residential Service (“GRS”) customers in both the Net Energy Metering (NEM) program and the Interim EV-TOU Pilot Program. Therefore, while the Interim EV-TOU Pilot Program has successfully been applied to GRS customers, the rate is current unavailable to GRS customers in the NEM program.

On July 26, 2024, LUMA notified this Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) of these implementation barriers, and on August 2, 2024, LUMA submitted additional information on mitigation measures and proposed short and long-term solutions to address these barriers. The proposed short-term solutions included temporarily unenrolling the NEM customers from the program, to prevent these customers from experiencing inaccurate billing or incurring charges relating to the Interim EV-TOU Pilot Program Rate, and conducting a research project with qualified NEM and electric vehicle (“EV”) customers along-side the Interim EV-TOU Pilot Program to learn more about EV charging behavior and to develop a more suitable long-term solution, tailored to the needs and constraints of NEM customers. Proposed long-term solutions may include conducting various technological enhancements to existing and potentially new NEM billing capabilities, exploring EV-specific rates and program designs that can better accommodate other customer classes, and adopting technology as it develops and/or becomes more accessible.

On August 26, 2023, the Energy Bureau approved the short-term solution of disenrolling NGRS customers, recognized the value of the proposed research project, and directed LUMA to provide additional information on this research project and other proposed solutions. Through this Motion, LUMA is submitting the information requested by the Energy Bureau.

## II. Relevant Procedural Background

1. On July 21, 2022, LUMA submitted to the Energy Bureau an Electric Vehicle Rate Design Proposal (“EV Rate Design Proposal”) in compliance with the Energy Bureau’s orders in this proceeding<sup>1</sup>. *See Motion Submitting Revised EV Rate Design Proposal* filed on July 21, 2022 (“July 21<sup>st</sup> Motion”). In the EV Rate Design Proposal, LUMA proposed an interim electric vehicle time of use rate (“Interim EV-TOU Pilot Program Rate”) and included a proposed tariff sheet for this interim rate (the “Proposed Tariff Sheet”). Also, in compliance with such orders, LUMA submitted on September 1, 2022, a draft Phase I EV Plan (“Phase I EV Plan”). *See Motion Submitting Draft Phase I EV Plan and Request to Postpone Compliance Technical Hearing No. 3 and Concomitant Deadline to Submit Revised Phase I EV Plan.*

2. On January 13, 2023, the Energy Bureau issued a Resolution and Order (the “January 13<sup>th</sup> Order”) approving the Interim EV-TOU Pilot Program Rate in the EV Rate Design Proposal, subject to certain modifications, and directing LUMA to file, by March 30, 2023, a Final Phase I EV Plan and complete, by September 30, 2023, the development and launch of the Interim EV-TOU Pilot Program Rate. *See* January 13<sup>th</sup> Order on pages 9, 10 and 14. The Energy Bureau also ordered LUMA to submit a report every thirty (30) days on the progress with the data collection and billing to integrate the Interim EV-TOU Rate (“Billing Integration Report”). *See id.*

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<sup>1</sup> *See* Resolution and Order of November 12, 2021 (“November 18<sup>th</sup> Order”), wherein the Energy Bureau ordered LUMA to file on or before September 1, 2022, a First Phase of an Electric Vehicle Charging Infrastructure Deployment Plan (“Phase I EV Plan”) in accordance with the specified requirements set forth in the November 18<sup>th</sup> Order (*see* November 18<sup>th</sup> Order on page 4) and file on or before May 31, 2022, a proposal for one or more rate designs targeting certain customer segments and addressing the requirements in the November 18<sup>th</sup> Order (*see id.* at pages 5-9). *See also* Resolution and Order of May 19, 2022 (“May 19<sup>th</sup> Order”), wherein the Energy Bureau amended the deadlines for filing the draft of the rate design proposal to May 31, 2022, and for filing a draft Phase I EV Plan for September 30, 2022, as well as established a deadline to file a final EV Rate Design Proposal of June 30, 2022, among others. *See* May 19<sup>th</sup> Order on page 1. LUMA filed the first draft EV Rate Design Proposal on May 31, 2022. *See Motion Submitting Draft of EV Rate Design Proposal* filed on May 31, 2022.

at page 11.

3. The Energy Bureau further ordered LUMA to update data collection and analysis methods related to the planning and design of the successor EV-TOU Rate, submit a project schedule for the implementation of the Interim EV-TOU Rate by February 10, 2023, and finish development and launch the Interim EV-TOU Pilot Program Rate by September 30, 2023. *See id.* on page 14. The Energy Bureau also required LUMA to develop customer information about the Interim EV-TOU Pilot Program Rate, including the complete tariff sheet (meeting specified requirements), and send it to EV owners before implementing the tariff, to advise them of the rate and invite them to enroll in it. *See id.* on page 11.

4. On February 14, 2023, the Energy Bureau issued a Resolution and Order (“February 14<sup>th</sup> Order”) ordering LUMA to present the Billing Integration Report commencing on March 13, 2023, and every thirty (30) days thereafter with progress on data collection and billing to integrate the Interim EV-TOU Pilot Program Rate.

5. Thereafter, LUMA submitted several Billing Integration Reports, in compliance with the January 13<sup>th</sup> Order and the February 14<sup>th</sup> Order.<sup>2</sup>

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<sup>2</sup> *See Motion to Submit Billing Integration Report and Request to Modify Frequency*, filed on March 13, 2023; *Motion to Submit May 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on May 12, 2023; *Motion to Submit June 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023* filed on June 12, 2023; *Motion to Submit July 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on July 11, 2023; *Motion to Submit August 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on August 10, 2023; *Motion to Submit September 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on September 11, 2023; *Motion to Submit October 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on October 10, 2023; *Motion to Submit November 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on November 8, 2023; *Motion to Submit December 2023 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on December 8, 2023; *Motion to Submit January 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on January 8, 2024; *Motion to Submit February 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on February 6, 2024; *Motion to Submit March 2024 Billing Integration Report in*

6. On February 17, 2023, LUMA submitted the project schedule addressing the tasks to fulfill the requirements relating to the Phase I EV Plan and the development and launch of the Interim EV-TOU Pilot Program Rate (“Project Schedule”). *See Motion Submitting Project Schedule in Compliance with Resolution and Order of January 13, 2023, and Requesting Modification of Certain Deadlines Thereunder* dated February 17<sup>th</sup>, 2023.

7. On March 29, 2023, the Energy Bureau issued a Resolution and Order (the “March 29<sup>th</sup> Order”) approving the Project Schedule submitted by LUMA and, among others, modifying the deadline for commencing billing integrating the Interim EV-TOU Pilot Program Rate to November 30, 2023. *See March 29<sup>th</sup> Order* on page 3.

8. On May 1, 2023, LUMA submitted to the Energy Bureau the Final Phase I EV Plan in compliance with the January 13<sup>th</sup> Order in the form of the document titled Puerto Rico’s Electric Vehicle Adoption Plan (“PR-EVAP”). *See Motion to Submit Final Phase I EV Plan in Compliance with Resolution and Order of January 13, 2023*, filed on May 1, 2023.

9. On December 20, 2023, the Energy Bureau issued a Resolution and Order in which, among others, it extended the deadline to commence billing integrating the Interim EV-TOU Pilot Program Rate until February 1, 2024.

10. On March 1, 2024, the Energy Bureau issued a Resolution and Order further extending the deadline for commencement of the billing integrating the Interim EV-TOU Pilot Program Rate until April 30, 2024.

11. On March 28, 2024, LUMA filed with the Energy Bureau in Case No. NEPR-MI-

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*Compliance with Orders of January 13 and February 14, 2023*, filed on March 7, 2024; *Motion to Submit April 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023 and Inform of the Tariff Sheet for the Interim EV-TOU Rate and Customer Outreach Progress*, filed on April 8, 2024; and *Motion to Submit May 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on May 8, 2024.

2021-0008, *In re: Review of LUMA's Model Bill* (“Model Bill Docket”), a request for approval of a revised version of the Model Bill, submitted as an Exhibit 1, to include changes to incorporate the Interim EV-TOU Pilot Program Rate in the bill. *See Request for Approval to Incorporate the Electric Vehicle Time of Use Rate into the Model Bill* filed on March 28, 2024 (“March 28<sup>th</sup> Motion”).

12. On April 8, 2024, LUMA submitted to the Energy Bureau the tariff sheet for the Interim EV-TOU Rate (“EV-TOU Pilot Program Tariff Sheet”), in Spanish and English, and informed that it would provide copy of this Tariff Sheet to all customers showing interest in enrolling in the Interim EV-TOU Pilot Program Rate. *See Motion to Submit April 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023, and Inform on the Tariff Sheet for the Interim EV-TOU Rate and Customer Outreach Progress*, filed on April 8, 2024 (“April 8<sup>th</sup> Motion”) on pages 4 and 5 and Exhibit 2.

13. On April 29, 2024, LUMA submitted to the Energy Bureau an updated version of the EV-TOU Pilot Program Tariff Sheet informing that it had revised it to include the formula for the Interim EV-TOU Pilot Program Rate, instead of the specific rate filed in the April 8<sup>th</sup> Motion, which was subject to quarterly changes. *See Motion Re-Submitting the Tariff Sheet for the Interim EV-TOU Rate*, filed on April 29, 2024, on page 2.

14. On April 30, 2024, LUMA informed the Energy Bureau that it had completed the development and launch of the Interim EV-TOU Pilot Program Rate, including billing integrating the Interim EV-TOU Pilot Program Rate, and requested the Energy Bureau that it release LUMA from submitting further Billing Integration Reports after the filing of the Billing Integration Report scheduled for May 8, 2024. *See Informative Motion Regarding Launch of Interim EV-TOU Rate and Request of Release from Requirements to File Billing Integration Reports*, filed on April 30,

2025.

15. On May 8, 2024, LUMA submitted its last Billing Integration Report. *See Motion to Submit May 2024 Billing Integration Report in Compliance with Orders of January 13 and February 14, 2023*, filed on May 8, 2024.

16. On May 22, 2024, the Energy Bureau issued a Resolution and Order (“May 22<sup>nd</sup> Resolution and Order”) in which it took notice of the EV-TOU Pilot Program Tariff Sheet submitted by LUMA and released LUMA from submitting further Billing Integration Reports after filing the Billing Integration Report scheduled for May 8, 2024. *See* May 22<sup>nd</sup> Resolution and Order on pages 4-6. In addition, the Energy Bureau indicated that it agreed with LUMA on using a formula-based approach in the EV-TOU Pilot Program Tariff Sheet as proposed by LUMA in the April 29<sup>th</sup> Motion and requested a correction in the language of one of its Terms and Conditions. *See id.* at page 3.

17. In what is relevant to this Motion, the Energy Bureau further stated that it “ha[d] recently learn[ed] of the potential impacts of LUMA’s [Interim EV-TOU Pilot Program Rate] on [NEM] customers depending on the amount of solar [energy] generated and the timing of the EV Charging consumption under the [Interim EV-TOU Pilot Program Rate]” and that “customers are concerned about the impact on net metering credits should they begin to charge an EV 100% Off-Peak, which corresponds to the time of day their solar system is generating the most energy (9:00 a.m. – 5:00 p.m.)”. *See id.* on page 4. The Energy Bureau also mentioned that the EV Rate Design Proposal identified NEM customers as in “need of specific[al] consideration in the development of an EV Rate”. *See id.* The Energy Bureau then ordered LUMA to, within ten (10) days of issuance of the May 22<sup>nd</sup> Resolution and Order, respond to requests for information in Part III of the May 22<sup>nd</sup> Resolution and Order (“RFIs”), which RFIs included questions on enrollment

specific to NEM or how the Interim EV-TOU Pilot Program Rate may affect NEM customers. *See id.* on pages 4-5.

18. On June 3, 2024, LUMA submitted as an Exhibit 2 its responses to the RFIs from the Energy Bureau. *See Motion to Submit Revised EV-TOU Tariff Sheet and Responses to Requests for Information in Compliance with Order of May 22, 2024, and Inform on Compliance with Requirement to Submit Revised Model Bill*, filed on June 3, 2024 (“June 3<sup>rd</sup> Motion”). In addition, LUMA re-filed the EV-TOU Pilot Program Tariff Sheet, as an Exhibit 1, in Spanish and English, with the revision required in the May 22<sup>nd</sup> Resolution and Order. *See id.* on page 9.

19. On July 15, 2024, LUMA re-submitted a revised Spanish version EV-TOU Pilot Program Tariff Sheet to correct an inconsistency identified by LUMA in the language of a footnote between the English and Spanish versions of the EV-TOU Pilot Program Tariff Sheet submitted as Exhibit 1 in the June 3<sup>rd</sup> Motion. *See Motion Re-Submitting the Spanish EV-TOU Rate Tariff Sheet*, filed on July 15, 2024.

20. On July 26, 2024, LUMA filed with the Energy Bureau a *Notice of Barriers to Implementation of Interim EV-TOU Pilot Program Rate for NEM Customers* (“July 26<sup>th</sup> Notice”) in which it notified the Energy Bureau that it identified a billing configuration limitation within the CC&B system that prevents the simultaneous participation of GRS customers in both the NEM program and the Interim EV-TOU Pilot Program Rate. Therefore, LUMA stated that it was unable to offer the Interim EV-TOU Pilot Program Rate to GRS customers enrolled in NEM (or NGRS customers), and that the Interim EV-TOU Pilot Program Rate would not be reflected in the NGRS customers’ upcoming bills. In the July 26<sup>th</sup> Notice, LUMA further stated that it would provide the Energy Bureau a detailed assessment of the informed situation, including on the limitations encountered, how LUMA proposes to maintain program participation and lessons learned, no later

than August 2, 2024.

21. On August 2, 2024, LUMA filed a *Supplementary Filing Regarding Barriers to Implementation of Interim EV-TOU Pilot Program Rate for NEM Customers and Request for Approval of Short-Term Proposals* (“August 2<sup>nd</sup> Motion”) informing of LUMA’s proposals to address the barriers described in the July 26<sup>th</sup> Notice. Specifically, LUMA informed that it had faced two main barriers posed by the interactions between the NEM program and the Interim EV-TOU Pilot Program Rate- to wit: 1) a pre-launch barrier, involving limitation of LUMA’s system for accounting solar energy generation during off-peak hours, and 2) a post-launch barrier involving a new billing configuration limitation that was identified within the CC&B system that prevents the simultaneous participation of a GRS customer in both the NEM program and the Interim EV-TOU Pilot Program. *See* August 2<sup>nd</sup> Motion on page 8. LUMA also notified that it had taken steps to notify affected NEM customers of the situation, the potential impact on billing, and the measures that LUMA was considering to address the situation. *See id.*

22. LUMA also submitted as an Exhibit 1 to the August 2<sup>nd</sup> Motion a document discussing the mitigation strategies and proposed short and long-term solutions. *See id.* at page 8 and Exhibit 1. The proposed short-term solutions included unenrolling NEM customers from the Interim EV-TOU Pilot Program Rate so that customers do not incur charges related to the Interim EV-TOU Pilot Program Rate, thus alleviating concerns about inaccurate billing, and simultaneously conducting a research project aimed at NEM customers and their charging needs. *See id.* The data from this research project and the findings of the of the Interim EV-TOU Pilot Program would be combined to provide an overview of EV customers across Puerto Rico, thereby contributing to the design of a permanent rate that is scalable, accessible, and satisfactory to EV customers in Puerto Rico. *See id.* The proposed long-term solutions included various technological

enhancements to existing and potentially new NEM billing capabilities, exploring EV-specific rates and program designs that can better accommodate other customer classes, and adopting technology as it develops and/or becomes more accessible. *See id.* at page 9 and Exhibit 1.

23. LUMA then respectfully requested the Energy Bureau to approve the short-term proposal as described in the Exhibit 1 so LUMA could implement them ahead of the next billing cycle beginning August 28, 2024. *See id.* at page 9.

24. On August 26, 2024, the Energy Bureau issued a Resolution and Order (“August 26<sup>th</sup> Order”) approving LUMA’s proposal to unenroll NGRS customers to avoid these customers experiencing inaccurate billing or incurring charges related to the Interim EV-TOU Pilot Program Rate and recognizing the value of the research project proposed by LUMA to find a long-term solution to the issues presented. *See* August 26<sup>th</sup> Order on page 4. The Energy Bureau found, however, that LUMA had not provided information with sufficient detail on the timeline, scope and cost of the research project and, therefore, ordered LUMA to provide, within ten (10) days of the issuance date of the August 26<sup>th</sup> Order, detailed responses to the request of information (“ROI”) in Section III of the August 26<sup>th</sup> Order. *See id.* Section III sets forth the following ROI (“August 26<sup>th</sup> ROI”):

1. Refer to Section 2.0 on page 3 of Exhibit 1 as included in LUMA's August 2 Motion related to the billing integration tests.
  - a. Please describe each billing integration test conducted in connection with testing the implementation of the EV-TOU Rate with NGRS customers. Include in your response a description of the methodology and results for each test.
  - b. What type of EV-TOU rate was used in the billing integration tests? For example, did the billing integration tests examine a three-period TOU rate?
  - c. Please explain why the issue of billing configuration limitations with the CC&B system was not identified during the billing integration tests.
2. Please provide a detailed explanation of the "billing configuration limitation."
3. What upgrades or new investments will LUMA need to make to address the "billing configuration limitation"? Please provide a description of each upgrade or new investment.

4. How does LUMA plan to fund the upgrades or new investments identified in response to questions 3?
5. Does LUMA have an anticipated date by when it will make the necessary upgrades to the billing system to address the "billing configuration limitation"?
6. Refer to Exhibit 1 of the August 2 Motion at Section 4.0 related to the research project.
  - a. What is the anticipated start date and end date of the research project?
  - b. Please explain how LUMA plans to use the EV charging data from the research project to develop solutions to barriers preventing NEM customers from enrolling in an EV IOU rate.
  - c. What incentive level does LUMA plan to provide to customers enrolling in the research project?
  - d. Will the customer incentive be the cost associated with the research project? If not, please provide a budget table for each year of the research project.
  - e. How will LUMA fund the research project and the associated customer incentives?

*Id.* at pages 4-5.

### **III. Submittal of Responses to ROI**

25. In compliance with the August 26<sup>th</sup> Order, LUMA hereby submits its responses to the August 26<sup>th</sup> ROI. *See Exhibit 1.*

26. LUMA remains committed to continue working with its customers, the Energy Bureau, and stakeholders on the Interim EV-TOU Pilot Program and other efforts that support EV adoption in Puerto Rico.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the responses to the August 26<sup>th</sup> ROI in *Exhibit 1* of this Motion in compliance with the August 26<sup>th</sup> Order.

### **RESPECTFULLY SUBMITTED**

In San Juan, Puerto Rico, this 5<sup>th</sup> day of September 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 courtesy copy of this motion to the attorneys for PREPA, Mirelis Valle Cancel, mvalle@gmlex.net and Alexis Rivera, arivera@gmlex.net, and to the Independent Office of Consumer Protection by submittal to Hannia Rivera, hrivera@jrsp.pr.gov. LUMA understands that other participants or stakeholders in this proceeding will be notified as a result of the publicity of the filings in this process. Notwithstanding, LUMA

will send a courtesy copy of the filing to the following stakeholders: agalloza@aggpr.com;  
alberto.cortes@warrendelcaribe.com; aldo@skootel.com; angel.d.rodriguez@outlook.com;  
antonio@velocicharge.com; apietrantonio@pmaalaw.com; azayas@azeng.net;  
bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com;  
carlosxcdeno@gmail.com; clrivera@caguasexpressway.com; flota@caguasexpressway.com;  
cnegrette@solrenew.com; CR.Tejera@ddec.pr.gov; dacosta@aggpr.com;  
daniel.perez@totalenergies.pr; dcordero@group-em.com; direxec@ciapr.org;  
divine.energy@hotmail.com; ecruz@pmaalaw.com; eduardo.pinera@toyota.com;  
Edwin.Acevedo@ddec.pr.gov; emelyies.torres@toyota.com; epenegypr@gmail.com;  
erica.cosme@gsonnell.com; Fberrios@peritoselectricistas.org; francisco.berrios@hotmail.com;  
franciscojrullan@yahoo.com; gerard.berlinski@toyota.com; gerardo\_cosme@solartekpr.net;  
gperez@solrenew.com; hamely@motorambar.net; ialsina@plazalasamericas.com;  
idiaz@glenninternational.com; info@carlosmatta.com; jack@pantekpartners.com;  
jameauxl@aim.com; jan.rodriguez@toyota.com; javrua@sesapr.org;  
jbouza@caguasexpressway.com; jcardona@aggpr.com; jmartinez@pmaalaw.com;  
jorrodriiguez@motorambar.net; jortiz@caguasexpressway.com; jose.maeso@crowley.com;  
jpibernus@motorambar.com; JSantana@motorambar.com; jtosado@motorambar.net;  
juan.diaz.galarza@guidehouse.com; jvazquez905@gmail.com;  
kenan.d.davila@sargentlundy.com; kkoch@tesla.com; l.marcano@aconer.org;  
lsundeen@tesla.com; luisgmoreno@gmail.com; Marangelly.Cruz@toyota.com;  
marilyn.maldonado@toyota.com; mlandron@plazaad.com; mpietrantonio@pmaalaw.com;  
nannette.berrios@solpetroleum.com; nmontes@ccmpr.com; nrodriguez@senado.pr.gov;  
Ochavez@Padigm.com; odette@grupofernandezpr.com; omundo@plazalasamericas.com;  
patlopez00@gmail.com; dany.oliva@toyota.com; pjcleanenergy@gmail.com;  
rdiaz@glenninternational.com; repagan@burnsmcd.com; rry@tcm.law;  
Ruben.Gonzalez@pumaenergy.com; rvega@guidehouse.com; salvadorlopez5@hotmail.com;  
shehaly.rosado@ddec.pr.gov; Veronica@pantekpartners.com; Victor.Aponte@toyota.com;  
victor.martinez@totalenergies.pr; wilfredsonllc@gmail.com; zlopez@efonalledas.com;  
mara.cruz@toyota.com; lizette.cotto@toyota.com.



**DLA Piper (Puerto Rico) LLC**  
500 Calle de la Tanca, Suite 401  
San Juan, PR 00901-1969  
Tel. 787-945-9107  
Fax 939-697-6147

/s/ Laura T. Rozas  
Laura T. Rozas  
RUA Núm. 10,398  
laura.rozas@us.dlapiper.com

**Exhibit 1**

Responses to August 26<sup>th</sup> ROI



Response to ROI Regarding the  
Interim Electric Vehicle TOU Pilot  
Program in Resolution and Order of  
August 26, 2024

NEPR-MI-2021-0013  
SEPTEMBER 5, 2024

# August 26<sup>th</sup> Request for Information Order

## Response to the August 26<sup>th</sup> ROI (Request of Information)

NEPR-MI-2021-0013

**Response: RFI-LUMA-MI-2021-0013-20240826-PREB-0001**

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### INTRODUCTION

In response to the Puerto Rico Energy Bureau's Resolution and Order dated August 26, 2024 (August 26 R&O), LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively "LUMA") hereby submits this exhibit addressing the requests for information (ROI) regarding the implementation of the Interim Electric Vehicle Time of Use (EV-TOU) Pilot Program for Net Energy Metering (NEM) customers. This submission provides detailed responses to the questions outlined in Section III of the August 26 R&O and offers insights into the current billing configuration limitations of LUMA's Customer Care and Billing (CC&B) system, the necessary upgrades to support the Interim EV-TOU Pilot Program for NEM customers, and the Puerto Rico EV Charging Habits Program (EVCharge PR) that aims to understand the unique charging behaviors, patterns and preferences of LUMA's NEM Customers.

Time of Use (TOU) programs are widely implemented across various jurisdictions to promote energy conservation and optimize electricity usage. These programs typically use Advanced Metering Infrastructure (AMI), such as that being deployed by LUMA's Smart Meter Initiative, or other technologies to enable real-time energy monitoring and provide more accurate billing based on the time of day energy is consumed. LUMA remains committed to advancing the deployment of electric vehicle infrastructure in Puerto Rico and ensuring that all customers, including those participating in NEM programs, can benefit from innovative rate structures designed to promote sustainable energy consumption. This exhibit reflects LUMA's ongoing efforts to address the challenges identified in the implementation of the Interim EV-TOU Pilot Program and provides more information regarding the proposed path forward, the EVCharge PR Program.

# August 26<sup>th</sup> Request for Information Order

## 1.0 BILLING INTEGRATION TESTS

### REQUEST

Refer to Section 2.0 on page 3 of Exhibit 1 as included in LUMA's August 2 Motion related to the billing integration tests.

- a. Please describe each billing integration test conducted in connection with testing the implementation of the Interim EV-TOU Pilot Program with NGRS<sup>1</sup> customers. Include in your response a description of the methodology and results for each test.
- b. What type of Interim EV-TOU Pilot Program was used in the billing integration tests? For example, did the billing integration tests examine a three-period TOU Rate?
- c. Please explain why the issue of billing configuration limitations with the CC&B system was not identified during the billing integration tests.

### RESPONSE

- a. The billing integration workstream for the Interim EV-TOU Pilot Program followed the Revised EV Rate design Proposal as approved by the Energy Bureau, which only considered GRS customers and did not include NEM customers. However, as the pilot program progressed and interest grew, it became evident that many EV owners were also NEM customers. To expand the pilot's reach and address this, the project team revised the eligibility requirements to include NEM customers.

Unfortunately, LUMA did not anticipate that NEM customer enrollment in the EV-TOU Pilot Program could not be immediately supported from a billing integration standpoint. LUMA assumed that integrating NEM customers into the EV-TOU rate would not represent significant incremental challenges, given the successful results from the testing conditions for GRS customers.

- b. The billing integration tests for the Interim EV-TOU Pilot Program utilized a three-period TOU rate structure. This structure includes distinct pricing periods for peak, off-peak, and mid-peak times, designed to encourage EV charging during times of lower demand. The tests focused on ensuring that the system correctly applied these different rates for GRS (General Residential Service) customers as per the EV Rate Design Proposal.
- c. The particular limitation with the CC&B system impacting NEM customer enrollment in the EV-TOU Rate was not identified during the billing integration tests because the tests were focused and conducted only on GRS customers, which do not have the NEM subsidy. LUMA tested the GRS configuration for the Interim EV-TOU Rate as it was designed for GRS customers. LUMA assumed that a similar configuration would be applied in order to enroll NEM customers. However, after the EV-TOU Program's launch, it became apparent to LUMA that to combine the EV-TOU rate with NEM rate, a complete redesign of the existing billing configuration would be required. Once the EV-TOU Rate is established as a permanent rate, the technical requirements for this integration will provide LUMA with insights into the costs associated with the project.

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<sup>1</sup> NGRS customers is a CC&B term. Moving forward LUMA will refer to these customers as NEM customers.

# August 26<sup>th</sup> Request for Information Order

## 2.0 EXPLANATION OF BILLING CONFIGURATION LIMITATION

### REQUEST

Please provide a detailed explanation of the "billing configuration limitation".

### RESPONSE

The term "billing configuration limitation" refers not to a fundamental incapacity of the CC&B system but to practical constraints related to time and budget. Due to these constraints, it is currently not feasible to configure the CC&B system to integrate the Interim EV-TOU Pilot Program with the existing billing algorithm for NEM customers. Enabling this integration requires a complete redesign of the CC&B system's configuration, including updates to billing algorithms and printing processes. The complexity arises from the need to configure the billing system to accommodate both the Interim EV-TOU Pilot Program structure and the specific subsidy mechanisms associated with NEM customers. This process involves significant adjustments and requires extensive testing to ensure that the billing system functions correctly under the new configuration.

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## 3.0 UPGRADES OR NEW INVESTMENTS FOR BILLING CONFIGURATION LIMITATION

### REQUEST

What upgrades or new investments will LUMA need to make to address the "billing configuration limitation"? Please provide a description of each upgrade or new investment.

### RESPONSE

To address the billing configuration limitation for the Interim EV-TOU Pilot Program, LUMA will need to focus on configuring the system to accurately apply the Interim EV-TOU Pilot Program for NEM customers. This involves adjusting the NEM subsidy and tariff within the system, which includes configuring and redesigning these elements to ensure they are correctly applied. The redesigned system will need thorough testing to ensure it accurately processes the Interim EV-TOU Pilot Program while preserving the integrity of NEM customers' earnings and credits.

The necessary steps include:

- **Configuration and Redesign:** Adjust the system to integrate the Interim EV-TOU Pilot Program by configuring the NEM subsidy and tariff. This redesign will involve developing and implementing new algorithms or modifying existing ones to ensure accurate billing.
- **Testing:** After configuration and redesign, the system must undergo comprehensive testing to validate that it manages the Interim EV-TOU Pilot Program and NEM subsidies correctly. This testing is crucial to confirm that the system applies the rates accurately and maintains the integrity of credits and earnings.
- **Automation:** The system's automation process must be designed to manage the new configurations effectively. This includes ensuring that the billing system can automatically apply the redesigned tariff and subsidy without manual intervention, supporting accurate and efficient billing.

To support the accurate implementation of the Interim EV-TOU Pilot Program, AMI will be essential. AMI provides real-time, granular data on electricity consumption, which is critical for precise billing and integration of new rate structures. While the current pilot project utilizes third-party data, future configurations and permanent implementations will require AMI to ensure the system has accurate and comprehensive information. This data will enhance the system's ability to manage complex billing scenarios and ensure correct application of the Interim EV-TOU rates.

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## 4.0 FUNDING FOR UPGRADES OR NEW INVESTMENTS

### REQUEST

How does LUMA plan to fund the upgrades or new investments identified in response to question 3?

### RESPONSE

Funding has not been planned or contemplated for FY25 due to budget restrictions. Funding would need to be allocated in FY26 O&M budgets or considered as part of an upcoming rate case.

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## 5.0 TIMELINE FOR NECESSARY UPGRADES

### REQUEST

Does LUMA have an anticipated date by when it will make the necessary upgrades to the billing system to address the "billing configuration limitation"?

### RESPONSE

LUMA does not currently have a specific anticipated date for implementing the necessary system configuration or upgrades to the billing system to address the "billing configuration limitation."

LUMA's approach will be informed by the research project's results, financial analysis, and the AMI implementation schedule. These factors will collectively determine the timeline for addressing the billing configuration limitations and implementing the necessary system enhancements in the long term. For the period of the Interim EV-TOU Pilot Program, no budget was identified to address the complete redesign of the configuration of the CC&B system that would be required.

The timeline for the upgrades in the long term will be influenced by several factors:

1. **Research Project Outcomes:** LUMA is conducting a research project to gather detailed information on the integration of the Interim EV-TOU Pilot Program for NEM customers. The results of this project will be crucial in determining the exact nature and scope of these required upgrades. The timeline for these upgrades will depend on how the research findings guide the development and implementation process.
2. **Financial Analysis:** Following the research project, LUMA will conduct a financial analysis to assess the costs and feasibility of the required upgrades. This analysis will help determine whether to proceed with the necessary investments and how to allocate resources effectively. The financial evaluation will influence the timeline for implementing the upgrades.
3. **Budget and Resource Allocation:** The availability of budgetary resources and the allocation of funds will also impact the timing of the configuration requirements or upgrades if needed. LUMA will need to secure the necessary funding through future budget cycles, such as upcoming fiscal year O&M budgets or through an upcoming rate case.
4. **Technology Implementation:** If the research and financial analysis indicate that including NEM customers is necessary, the timeline for the upgrades will align with the AMI implementation schedule. AMI technology is expected to be rolled out over a period of approximately 3 years<sup>2</sup>. LUMA would coordinate the billing system configurations or upgrades with this timeline to ensure compatibility and effectiveness.
5. **Long Term Solutions** – LUMA will determine what is the best and most cost-effective solution as it relates to system configuration or upgrades to CC&B.

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<sup>2</sup> This is contingent on the AMI implementation schedule.

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## 6.0 RESEARCH PROJECT INFORMATION

### REQUEST

Refer to Exhibit 1 of the August 2 Motion at Section 4.0 related to the research project.

- a. What is the anticipated start date and end date of the research project?
- b. Please explain how LUMA plans to use the EV charging data from the research project to develop solutions to barriers preventing NEM customers from enrolling in an Interim EV-TOU Pilot Program.
- c. What incentive level does LUMA plan to provide to customers enrolling in the research project?
- d. Will the customer incentive be the cost associated with the research project? If not, please provide a budget table for each year of the research project.
- e. How will LUMA fund the research project and the associated customer incentives?

### RESPONSE

The research project is divided into three (3) main efforts:

- **Creation of a new program:** Includes designing and implementing the EVCharge PR Program, an alternative research project that aims to understand the unique EV charging behaviors of LUMA NEM Customers.
- **Customer interface:** Includes implementing the necessary procedures and processes to ensure participation, data gathering, compensation processing, and customer support. That includes the adjustments to the current EV-TOU platform provider, system and communication resources to accommodate the new program.
- **Data analysis:** Processing an analysis of data provided by NEM customers, securely transferred through the EV-TOU platform provider.
  - a. The project has two start dates: one for existing customers (July 1, 2024), and another for new customers (October 31, 2024). The end date for all participants will be June 30, 2025.
  - b. LUMA will analyze NEM customer EV charging behavioral data to identify actual plug-in charging times, charging sessions durations, charging frequency and at home charging sessions information using telematics, data analytics and statistical models. LUMA will assess NEM customer interest in the program and proper future alignment with EV-TOU pricing periods. LUMA also plans to collaborate with solar and battery storage aggregators to cross-reference EV consumption data with energy exported to the grid or stored for backup, pending vendor authorization. Based on the results, LUMA will conclude if Interim EV-TOU Pilot Program and billing system investments are appropriate for NEM customers or if a more suitable solution for these customers should be considered.
  - c. Unlike the Interim EV-TOU Pilot Program that offers special rates for specific periods of time, LUMA will compensate EVCharge PR participants with a flat fee for allowing LUMA to gather their charging data regardless of the time they charge their vehicles. Participating customers will

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receive \$10 per account every quarter they are enrolled, up to a maximum of \$40 for the entire year. The payments will follow the pre-determined schedule below.

| QUARTER OF FY2025           | COMPENSATION |
|-----------------------------|--------------|
| July 1 – September 30       | \$10         |
| October 1 - December 31     | \$10         |
| January 1 – March 31        | \$10         |
| April 1 – June 30           | \$10         |
| <b>Maximum compensation</b> | <b>\$40</b>  |

- d. Yes, the customer incentive will be part of the research project cost. The maximum cost for customer incentives is \$10,000, and the estimated labor cost associated with the research and data analysis activities is \$16,000. The research project will occur in parallel with the EVCharge PR program.

| ACTIVITY                                       | ESTIMATED COST     |
|--|--------------------|
| Customer incentives (up to 250 participants)   | \$10,000.00        |
| Research project labor cost (1 SME, 1 Analyst) | \$16,000.00        |
| <b>Total</b>                                   | <b>\$26,000.00</b> |

- e. The research project will be funded from operating expenditures.