

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

NEPR Received: Nov 20, 2024 4:00 PM
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IN RE: REVIEW OF THE PUERTO RICO
POWER ELECTRIC AUTHORITY'S
PHYSICAL SECURITY PLAN

CASE NO. NEPR-MI-2020-0018

**SUBJECT: LUMA's Request for Extension
to Submit Responses to November 8th
Request of Information**

**MOTION IN REQUEST FOR EXTENSION TO COMPLY WITH THE
NOVEMBER 8th REQUEST OF INFORMATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On December 31, 2020, this Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order initiating the captioned confidential proceeding to evaluate LUMA's Physical Security Plan.

2. On May 28, 2021, LUMA filed a *Motion Submitting LUMA's Physical Security Plan*. Therein, LUMA submitted its Physical Security Plan ("Plan") developed pursuant to Section 4.2(h) of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("T&D OMA").

3. On July 2, 2021, the Energy Bureau entered a Resolution and Order approving the Plan with certain conditions, which included (a) filing a revised Plan with an accelerated padlock replacement or installation timeline during the near-term one (1) year; (b) filing a detailed timeline

on the near-term implementation of the Plan and the generation of the governance documents therein identified; and (c) filing final versions of the pending governance documents (“July 2nd Order”).

4. In compliance with July 2nd Order, on August 13, 2021, LUMA filed a *Motion in Compliance with Order Submitting LUMA’s Revised Physical Security Plan and Timeline of Near-Implementation*. Then, on December 8, 2021, LUMA filed a *Motion in Compliance with Order Submitting Governance Documents and Request for Confidential Treatment*.

5. Thereafter, on November 8, 2024, the Energy Bureau issued a Resolution and Order in which it ordered LUMA to submit, within thirty (30) days, the answers to the Request of Information (“ROI”) included in the Confidential Attachment A (“November 8th Order”), as part of its monitoring of the Plan. The responses to the ROIs from the November 8th Order are currently due on Monday, December 9, 2024.

6. LUMA respectfully informs that key personnel tasked with analyzing and providing the requested data will be unavailable during the coming weeks due to the upcoming holidays. Therefore, LUMA respectfully requests until December 16, 2024, to submit its responses to the ROIs, to comply with the November 8th Order. The additional time is necessary to ensure the appropriate, knowledgeable employees address the specific items included in Confidential Attachment A.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **grant** LUMA until December 16, 2024, to submit the responses to the ROIs, in compliance with the November 8th Order.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We hereby certify that we will send notice of this filing to counsel for the Puerto Electric Power Authority, Lionel Santa, lionel.santa@prepa.pr.gov.

In San Juan, Puerto Rico, this 20th day of November 2024.



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