

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

NEPR

Received:

Nov 15, 2024

4:17 PM

IN RE: REVIEW OF LUMA'S MODEL BILL

CASE NO. NEPR-MI-2021-0008

SUBJECT: Request for Approval of Revisions to LUMA Model Bill to Incorporate Bill Correction and Adjustment Information

**REQUEST FOR APPROVAL OF REVISIONS TO LUMA MODEL BILL TO
INCORPORATE BILL CORRECTION AND ADJUSTMENT INFORMATION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as "LUMA"), and respectfully submit and request the following:

1. On November 16, 2021, the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("November 16th Resolution") approving LUMA's proposed inaugural model bill, as submitted by LUMA to the Energy Bureau in the referenced proceeding via *Motion in Compliance with Energy Bureau's Resolution and Order of September 16, 2021* (the "September 29th Motion"), and authorizing LUMA to implement such approved model bill (the "LUMA Model Bill") in accordance with the provisions of the November 16th Resolution.

2. In the November 16th Resolution, the Energy Bureau also approved, as a temporary measure, language and information to be included in a document (separate from the bill) to be sent to customers to explain bill adjustments and corrections proposed by LUMA (as specified in an Exhibit A of the September 29th Motion), until such time LUMA was able to reprogram the billing system to reflect this information in the body of the LUMA Model Bill. *See* November 16th

Resolution on page 9. Furthermore, the Energy Bureau ordered LUMA to submit to the Energy Bureau, for its review and approval, any proposed modification to the LUMA Model Bill. *See id.*¹

3. LUMA herein informs that it has implemented the necessary modifications to its billing system to incorporate into the body of the LUMA Model Bill the information on bill adjustments and corrections, which will make it unnecessary to use the separate document approved in the November 16th Resolution. LUMA submits herein, for the Energy Bureau's review and approval, these proposed modifications, which are detailed in *Exhibit I* herein, and described below.

4. To incorporate the details for corrections and adjustments of invoices, LUMA is now proposing the following modifications to the LUMA Model Bill, which would appear in the bill whenever a bill correction or adjustment applies:

(a) Changes to Account Detail section. In the LUMA Model Bill, as approved to date, any corrections and adjustments applied to the billed amount are currently shown in the "Account Detail" (*Detalle de la Cuenta*) on the third logical page of the bill, in the line item "Invoice Correction" (*Corrección de factura*) located immediately below the "Current Charges" ("Cargos corrientes"). The "Invoice Correction" (*Corrección de factura*) line item currently provides a single amount attributable to corrections, without including any detail or breakdown (as this information is being provided in the mentioned separate document). LUMA now proposes to rename this line item as "Bill Adjustment" (*Ajuste de Factura*). In addition, LUMA proposes to add, below the "Bill Adjustment" (*Ajuste de Factura*) line item, a breakdown of the canceled and

¹ Since November 16, 2021 to the present, the Energy Bureau has approved revisions and updates to the LUMA Model Bill, by Resolutions of February 11, 2022, August 16, 2023, April 8, 2024, and June 28, 2024. The term "LUMA Model Bill" as used in this motion refers to the version approved by the Energy Bureau on November 16, 2021, with the revisions and updates subsequently approved by the Energy Bureau in those Resolutions.

rebilled charges, which will appear in two new line items “Canceled Charges” (*Cargos Cancelados*) and “Rebilled Charges” (*Cargos Refacturados*). Right below each of these line items, the bill will show the premise identification number and the time period (that is, date range) corresponding to the canceled charges and the rebilled charges, respectively. These canceled and rebilled charges will be shown from the most recent to the oldest. Figure 1-2 of *Exhibit 1* herein contains an example of the “Account Detail” section of the LUMA Model Bill with the changes described in this paragraph.

(b) Consumption History Detail. In the LUMA Model Bill, as approved to date, there is a section in the fourth logical page of the bill with a bar graph showing the customer’s history of consumption for the preceding twelve (12) months, under the heading “History of Consumption (KWH)” (*Historial de Consumo (KWH)*). In those bills with cancellations or adjustments, LUMA proposes to modify this graph to show those months subject to adjustments in bars delineated with a solid black line but containing no shading or filling (that is, the inside of the bars would be white, in contrast with the bars for actual and estimated reads which contain shading or diagonal lines) and to include in the legend of this graph, which currently indicates which bars are for “Actual Read” (*Lectura*) and “Estimated Read” (*Estimado*), an indication of which bars correspond to adjustments in the form of a box with no shading labelled Adjusted (*Ajustado*). Figure 1-3 of *Exhibit 1* herein contains an example of the mentioned graph in the “History of Consumption (KWH)” (*Historial de Consumo (KWH)*) section of the Model Bill with the changes described in this paragraph.

(c) Addition of “Service and Meter Information” sections. In the LUMA Model Bill, as approved to date, there is a section below the Account Detail (*Detalle de la Cuenta*) section on the third logical page of the bill, titled “Service and Meter Information” (*Información del Medidor*

y del Servicio), which provides information on the meter reads during the billing period followed by a subsection titled “Current Charges Detail” (*Detalle de los Cargos Corrientes*) which provides a breakdown of the current charges. The current bill does not provide similar details for invoice corrections/adjustments, since, as mentioned, these details are provided in the separate document authorized in the November 16th Resolution. In those bills with cancellations or adjustments, LUMA now proposes to include, additional “Service and Meter Information” (*Informacion del Medidor y del Servicio*) sections providing the details of the “Canceled Charges” and “Rebilled Charges” set forth in the Account Detail section (that is, each “Canceled Charges” and “Rebilled Charges” will have a separate “Service and Meter Information” section). These additional “Service and Meter Information” sections will be identical in format and display to the section with the same name in the current Model Bill, except that instead of the words “Current Charges Details”, the words “Canceled Charges Detail” (*Detalle de Cargos Cancelados*) or “Rebilled Charges Details” (*Detalle de Cargos Refacturados*), as applicable, will be the subtitles located immediately before the breakdown of charges. In addition, for cancellations, a line identifying the reason for the cancellation will be included below the “Total” (*Total*), with the words “Cancellation Reason:” (*Razon de cancelación:*) followed by the reason, such as, for example, “billing calculation error” (*error en calcular la factura*), “mass cancellation” (*cancelación en masa*), “incorrect reading” (*lectura incorrecta*) or “estimated reading” (*lectura estimada*), or other applicable reason. The cancellation reasons may vary depending on the situation, and, therefore, this text of the bill will be variable. These new Service and Meter Information sections will be displayed in a new fifth logical page of the LUMA Model Bill. Figures 1-5 and 1-6 of *Exhibit I* herein contain examples of the “Service and Meter Information” sections for each “Canceled Charges Detail” and “Rebilled Charges Detail”, as proposed in this paragraph.

5. LUMA first presented these modifications to OIPC in 2022. At the time, OIPC had suggested that LUMA modify the *Consumption History* Graph, as described in Section 1.2 of *Exhibit 1*. LUMA has addressed the feedback provided and reapproached OIPC in October 2024 to present the updates and address any remaining questions. .

6. LUMA respectfully submits that the proposed changes enhance the customer experience by transparently displaying all correction details in the body of LUMA's Model Bill, without the need for the customer to cross-reference additional documents. It also streamlines the billing process by eliminating the manual inputs required to generate a separate document, thereby enabling billing representatives to invest more time to enhancements to the billing process and addressing customer inquiries.

7. In compliance with the November 16th Resolution, LUMA respectfully requests this honorable Energy Bureau to approve the proposed changes to the Model Bill described in this Motion and *Exhibit 1*, which changes would be reflected only in those bills subject to cancellations or adjustments. LUMA informs that once these changes are approved, LUMA will conduct a two (2)-week pre-launch testing process prior to implementing the changes.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the above, accept **Exhibit 1** to this Petition, and **approve** and **authorize** LUMA to implement the revisions to the LUMA Model Bill described in this Motion and **Exhibit 1**.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of November 2024.

I hereby certify that I filed this Petition using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to the **Independent Office of**

Consumer Protection, Lcda. Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and the attorneys for PREPA, mvalle@gmlex.net and arivera@gmlex.net.



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

Description of Proposed Updates to LUMA Model Bill

Revised Model Bill

November 15, 2024

Exhibit 1 – Cancel, Rebill and Consumption Graph



Executive Summary

On November 16, 2021, the Puerto Rico Energy Bureau (Energy Bureau or PREB) issued a Resolution and Order (November 16 R&O approving LUMA's customer bill (the "Model Bill").¹ The November 16 R&O also approved the temporary use of a manual process whereby LUMA would provide customers, in a separate document, any supporting details related to adjustments or corrections that are summarized on the customer's bill.² This separate document had been agreed upon with the Independent Consumer Protection Office (ICPO) and proposed by LUMA on September 29, 2021, as a temporary measure until LUMA was able to reprogram its billing system and update its bill rendering processes to incorporate this information in the bill.³

LUMA has implemented the necessary modifications to its billing systems and bill rendering processes and is now requesting approval to update the Model Bill to include information regarding cancelled and rebilled charges. These modifications facilitate the presentation of the bill adjustments or corrections in the customer bill, thereby eliminating the need for a separate document. Customers will be able to review their consumption and invoice details without the need to cross-reference additional documents. LUMA is presenting to the Energy Bureau an updated Model Bill to reflect the new functionality herein. These changes will only impact customers who have an adjustment on their bills.

¹ See Resolution and Order of November 16, 2021, Docket No. NEPR-MI-2021-0008.

² *Id.*, page 9.

³ See pages 3-6 of Exhibit A of September 29, 2021, LUMA's Motion in Compliance with Energy Bureau's Resolution and Order of September 16, 2021, Docket No. NEPR-MI-2021-0008.

Revised Model Bill

Contents

Executive Summary	2
1.0 Detailed Description of Changes	4
1.1 Additional Wording: Account Detail	4
1.2 New Category: Consumption History Detail.....	6
1.3 New Sections: Canceled Charges Detail and Rebilled Charges Detail	7

Revised Model Bill

1.0 Detailed Description of Changes

LUMA is requesting approval to update the LUMA Model Bill to include the cancelled and rebilled charges information and eliminate the temporary manual process of sending a separate letter. Note that all of these proposed changes will only impact customers who require an adjustment on their bill.

The sections that will change on the Model Bill are:

- Account Detail – page three
 - Additional wording will be added to this section
- Consumption History Graph – page four
- Charges Detail – starting on page five
 - Cancelled Charges Detail
 - Rebilled Charges Detail

The changes that LUMA proposes to these sections are described in detail below.

1.1 Additional Wording: Account Detail

The *Account Detail* section, found on page three of the customer bill, currently only displays detailed billing information for the current month's charges. As shown in Figure 1-1, a bill correction is currently presented only as a single net dollar amount with no details or breakdown, as these are shared separately by letter.

Figure 1-1. Current LUMA Customer Bill: Account Detail Section (Spanish and English)

DETALLE DE LA CUENTA		ACCOUNT DETAIL	
Balance	\$0.00	Balance	\$0.00
<i>Cantidad adeudada del periodo anterior</i>	\$32.66	<i>Amount Due Previous Period</i>	\$32.66
<i>Pagos acreditados</i>	-\$32.66	<i>Payments Credited</i>	-\$32.66
Cargos corrientes	\$21.97	Current Charges	\$21.97
Corrección de factura	-\$19.85	Invoice Correction	-\$19.85
Cantidad Total Adeudada	\$2.12	Total Amount Due	\$2.12

As shown in Figure 1-2, LUMA proposes that the item labelled “Invoice Correction” in the *Account Detail* section will be changed to read “Billed Adjustments” instead. Two new line items will display underneath the “Billed Adjustments” line item, showing *Canceled Charges* and *Rebilled Charges*, respectively, separately and clearly. The red box in Figure 1-2 shows the proposed changes.

Revised Model Bill

Figure 1-2. Proposed LUMA Customer Bill: Account Detail Section (Spanish and English)

DETALLE DE LA CUENTA	
Balance <i>Pague inmediatamente</i>	\$648.59
<i>Cantidad adeudada del periodo anterior</i>	\$648.59
<i>Pagos acreditados</i>	\$0.00
Cargos corrientes	\$24.61
Ajuste de Factura	\$31.02
<i>Cargos Cancelados</i>	
██████████: 2023 11 12 - 2023 12 12	-\$25.52
<i>Cargos Refacturados</i>	\$56.54
██████████: 2023 11 12 - 2023 12 12	
Cantidad Total Adeudada	\$704.22

ACCOUNT DETAIL	
Balance <i>Pay immediately</i>	\$648.59
<i>Amount Due Previous Period</i>	\$648.59
<i>Payments Credited</i>	\$0.00
Current Charges	\$24.61
Bill Adjustment	\$31.02
<i>Canceled Charges</i>	
██████████: 2023 11 12 - 2023 12 12	-\$25.52
<i>Rebilled Charges</i>	\$56.54
██████████: 2023 11 12 - 2023 12 12	
Total Amount Due	\$704.22

Details about the charges will be presented below each of the *Canceled Charges* and *Rebilled Charges* line items. The canceled and rebilled billing periods will be displayed (from the most recent to the oldest), and beside them will be the premises identification number. The canceled and rebilled charges lines will also show the corresponding date ranges of the adjustment and the total of the amount of all canceled and rebilled periods.

In summary, the *Account Detail* section will now show the net of the bill correction and the details of the canceled and rebilled amounts. These amounts match the detailed consumption information provided on the *Canceled and Rebilled Charges Detail* section, which starts on page five of the customer bill and is illustrated below in Figures 1-5 and 1-6.

Revised Model Bill

1.2 New Category: Consumption History Detail

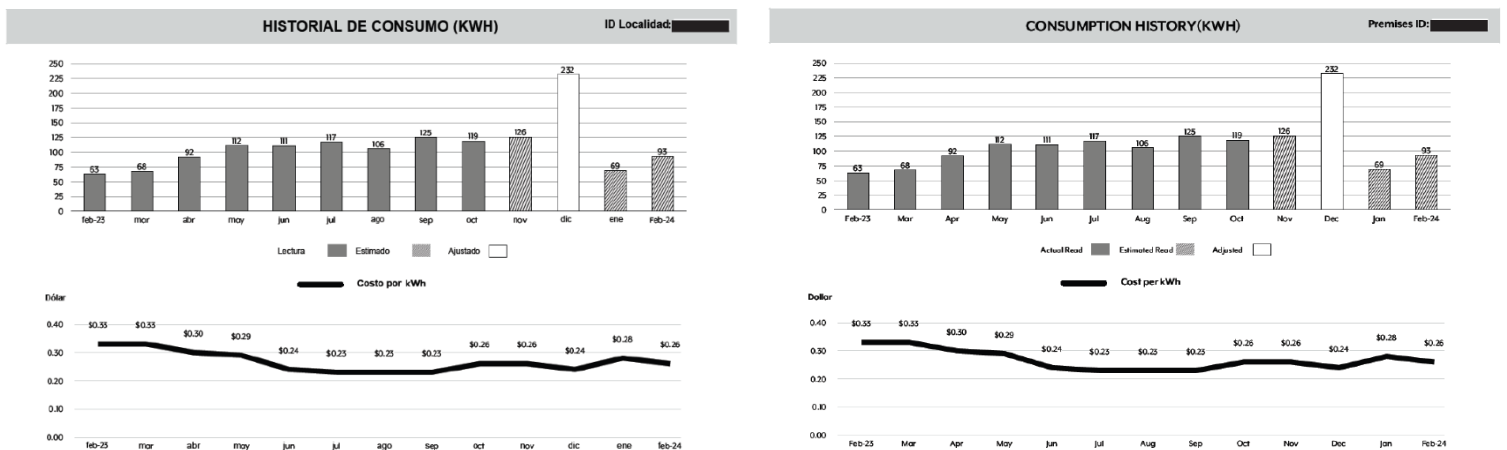
The *Consumption History* section found on page four of the customer bill currently shows the previous 12 months, with a delineation between whether the customer's consumption was read or estimated. A customer who has an adjustment processed on their bill is unable to identify the adjustment in the *Consumption History* graph on page four of their bill. See Figure 1-3 for the current presentation of this information.

Figure 1-3. Current LUMA Customer Bill: Consumption History Detail (Spanish and English)



LUMA proposes to update the *Consumption History (kWh)* graph on the fourth page of the Model Bill to reflect and clearly identify the bill adjustment. With the proposed modification, the chart will display the adjusted month as a white bar, as illustrated in Figure 1-4.

Figure 1-4. Proposed LUMA Customer Bill: Consumption History Detail (Spanish and English)



Revised Model Bill

1.3 New Sections: Canceled Charges Detail and Rebilled Charges Detail

Canceled and rebilled charges details will now be shown, separately, in additional *Service and Meter Information* sections to be included in the bill. The details of each canceled and rebilled period will be presented chronologically, from the most recent to the oldest. These additional sections will also illustrate the adjustment of the consumption charge, and the rest of the charges billed per kWh for the period, as shown in Figures 1-5 and Figure 1-6.

With the details of both the canceled and the rebilled charges now clearly presented on the customer bill, a customer can compare the canceled details with the rebilled details and easily identify where consumption was adjusted. This reaffirms LUMA's commitment to provide customers with a transparent and detailed bill.⁴ Furthermore, this section will also provide the reason why the charges are being canceled and rebilled. These reasons will vary depending on the situation. Therefore, the language in this part of the bill must remain variable.

These new sections will be added only for customers who have an adjustment to their bill, and will be displayed starting on page five of the customer bill.

⁴ Per the requirements set forth in article 6.25 (b)(9) of Act 57 of 2014, as amended, known as the "*Puerto Rico Energy Transformation and Relief Act*"; and section 6 (i) of Act 83 of 1941, as amended, known as the "*Puerto Rico Electric Power Authority Act*".

Revised Model Bill

Figure 1-5. Proposed LUMA Customer Bill: Cancelled Charges Detail (Spanish and English)

INFORMACIÓN DEL MEDIDOR Y DEL SERVICIO							
Dirección del servicio: [REDACTED]				ID localidad: [REDACTED]			
Tarifa: Servicio Residencial General		Periodo: 12-nov-2023 a 12-dic-2023		Próxima lectura: Mar-13			
Número de contador	Fecha de lectura	Lectura actual	Fecha de lectura anterior	Lectura anterior	Consumo		Constante
					kWh	Días	
[REDACTED]	12-dic	10823.00 A	12-nov	10728.00	95.00	30	1

DETALLE DE CARGOS CANCELADOS		
DESCRIPCIÓN	TARIFA	CARGO
Cargos por Servicio		
Cargo por Cliente		\$4.00
Cargo por Consumo	95 kWh x \$0.04944	\$4.70
Subtotal		\$8.70
Cláusulas de Reconciliación		
Cláusula FCA-Ajuste Cargo de Combustible	95 kWh x \$0.130057	\$12.36
Cláusula PPCA-Ajuste por Compra de Energía	95 kWh x \$0.025168	\$2.39
Cláusula CILTA-CELI (Municipios)	95 kWh x \$0.007049	\$0.67
Cláusula SUBA-Subsidios HH	95 kWh x \$0.013717	\$1.30
Cláusula SUBA-Subsidios NHH	95 kWh x \$0.001042	\$0.10
Cláusula EE-Cargo Eficiencia Energética	95 kWh x \$0.00	\$0.00
Subtotal		\$16.82
Total		CR \$25.52
Razón de cancelación: Corrección Cálculo de Factura		

SERVICE AND METER INFORMATION							
Service Address: [REDACTED]				Premises ID: [REDACTED]			
Rate: General Residential Service		Period: Nov-12-2023 to Dec-12-2023		Next Read: 13-Mar			
Meter Number	Read Date	Current Read	Previous Read Date	Previous Read	Consumption		Constant
					kWh	Days	
[REDACTED]	12-Dec	10823.00 A	12-Nov	10728.00	95.00	30	1

CANCELLED CHARGES DETAIL		
DESCRIPTION	TARIFF	CHARGE
Service Charges		
Customer Charge		\$4.00
Consumption Charge	95 kWh x \$0.04944	\$4.70
Sub-Total		\$8.70
Reconciliation Clauses and Riders		
Rider FCA-Fuel Charge Adj	95 kWh x \$0.130057	\$12.36
Rider PPCA-Purchased Power Charge Adj	95 kWh x \$0.025168	\$2.39
Rider CILTA-Municipalities Adj	95 kWh x \$0.007049	\$0.67
Rider SUBA - Subsidies, Public Light & other Subv HH	95 kWh x \$0.013717	\$1.30
Rider SUBA-Subsidies, Public Light & other Subv NHH	95 kWh x \$0.001042	\$0.10
Rider EE - Energy Efficiency Charge	95 kWh x \$0.00	\$0.00
Sub-Total		\$16.82
Total		CR \$25.52
Cancellation Reason: Bill Calculation Correction		

Revised Model Bill

Figure 1-6. Proposed LUMA Customer Bill: Rebilled Charges Detail (Spanish and English)

INFORMACIÓN DEL MEDIDOR Y DEL SERVICIO							
Dirección del servicio: [REDACTED]				ID localidad: [REDACTED]			
Tarifa: Servicio Residencial General		Periodo: 12-nov-2023 a 12-dic-2023		Próxima lectura: Mar-13			
Número de contador	Fecha de lectura	Lectura actual	Fecha de lectura anterior	Lectura anterior	Consumo		Constante
					kWh	Días	
[REDACTED]	12-dic	10823.00 A	12-nov	10728.00	95.00	30	1

DETALLE DE CARGOS REFACTURADOS		
DESCRIPCIÓN	TARIFA	CARGO
Cargos por Servicio		
Cargo por Cliente		\$4.00
Cargo por Consumo	232 kWh x \$0.04944	\$11.47
Subtotal		\$15.47
Cláusulas de Reconciliación		
Cláusula FCA-Ajuste Cargo de Combustible	232 kWh x \$0.130057	\$30.17
Cláusula PPCA-Ajuste por Compra de Energía	232 kWh x \$0.025168	\$5.84
Cláusula CILTA-CELI (Municipios)	232 kWh x \$0.007049	\$1.64
Cláusula SUBA-Subsidios HH	232 kWh x \$0.013717	\$3.18
Cláusula SUBA-Subsidios NHH	232 kWh x \$0.001042	\$0.24
Cláusula EE-Cargo Eficiencia Energética	232 kWh x \$0.00	\$0.00
Subtotal		\$41.07
Total		\$56.54

SERVICE AND METER INFORMATION							
Service Address: [REDACTED]				Premises ID: [REDACTED]			
Rate: General Residential Service		Period: Nov-12-2023 to Dec-12-2023		Next Read: 13-Mar			
Meter Number	Read Date	Current Read	Previous Read Date	Previous Read	Consumption		Constant
					kWh	Days	
[REDACTED]	12-Dec	10960.00 A	12-Nov	10728.00	232.00	30	1

REBILLED CHARGES DETAIL		
DESCRIPTION	TARIFF	CHARGE
Service Charges		
Customer Charge		\$4.00
Consumption Charge	232 kWh x \$0.04944	\$11.47
Sub-Total		\$15.47
Reconciliation Clauses and Riders		
Rider FCA-Fuel Charge Adj	232 kWh x \$0.130057	\$30.17
Rider PPCA-Purchased Power Charge Adj	232 kWh x \$0.025168	\$5.84
Rider CILTA-Municipalities Adj	232 kWh x \$0.007049	\$1.64
Rider SUBA - Subsidies, Public Light & other Subv HH	232 kWh x \$0.013717	\$3.18
Rider SUBA-Subsidies, Public Light & other Subv NHH	232 kWh x \$0.001042	\$0.24
Rider EE - Energy Efficiency Charge	232 kWh x \$0.00	\$0.00
Sub-Total		\$41.07
Total		\$56.54