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

NEPR

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IN RE: ELECTRIC VEHICLE CHARGING INFRASTRUCTURE DEPLOYMENT

CASE NO. NEPR-MI-2021-0013

SUBJECT: Motion to Submit Responses to Request for Information in Compliance with Resolution and Order of March 21, 2025

MOTION TO SUBMIT RESPONSES TO REQUEST FOR INFORMATION IN COMPLIANCE WITH RESOLUTION AND ORDER OF MARCH 21, 2025

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

As per the directives of the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") in this proceeding, LUMA has developed Puerto Rico's Electric Vehicle Adoption Plan ("PR-EVAP"), to accelerate the growth and infrastructure deployment for Electric Vehicles, and has developed and launched an Electric Vehicle ("EV") Time of Use Rate pilot program with the objective of advancing vehicle electrification by providing rate options that add value and fuel cost savings to drivers while offering appropriate cost recovery for providing clean fuel (electricity) to power those vehicles.

Relatedly, on February 28, 2025, LUMA filed with the Energy Bureau its first Semi-Annual Report on the PR-EVAP for fiscal year ("FY") 2025 ("FY2025 First Semi-Annual Report"), in

compliance with Energy Bureau Resolutions and Orders of January 13, 2023, and April 23, 2024. In this report, LUMA highlighted the broad spectrum of actions that it had undertaken during the past semester to implement the PR-EVAP, including, among others, continued efforts to educate and engage with different stakeholders and customers to share useful information about EVs and EV charging, and the EV Time of Use Rate pilot program; continued development and improvement of general and program specific educational resources to provide information on EVs, including the EV focused webpage and EV-specific educational information for customers; continued workforce development activities; and continued engagement with the public transportation and fleet sector.

By Resolution and Order of March 21, 2025 ("March 21st Resolution"), the Energy Bureau accepted the FY2025 First Semi-Annual Report and found that it complied with the aforementioned resolutions and orders. The Energy Bureau also requested additional information on the content of this report in the form of responses to a Request for Information ("ROI").

In compliance with the March 21st Resolution, LUMA is submitting in Exhibit 1 herein its responses to the ROI. These responses underscore LUMA's commitment to transparency, program efficacy, and alignment with the PR-EVAP and Puerto Rico energy policy objectives. LUMA reiterates its commitment to continued advancement in the implementation of the PR-EVAP in support of Puerto Rico's clean energy goals.

II. Relevant Procedural Background

1. On January 13, 2023, the Energy Bureau issued a Resolution and Order (the "January 13th Resolution"), in which, among others it approved the Interim EV Time of Use ("TOU") Rate submitted by LUMA in this proceeding on July 21, 2022¹, subject to certain

¹ See LUMA's Motion Submitting Revised EV Rate Design Proposal, filed on July 1, 2022.

modifications; directed LUMA to file a final version of the Phase I EV Plan submitted by LUMA in this proceeding on September 1, 2022², and to file Semi-Annual Reports to follow through and account for its proposed actions and report on the specific outcomes of each action of the Phase I EV Plan; and established a deadline to develop and launch the Interim EV TOU Rate, as well as deadlines for EV Plan related activities.

2. On May 1, 2023, LUMA submitted to the Energy Bureau the Final Phase I EV Plan in the form of a 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. In the PR-EVAP, LUMA included the requirements to file Semi-Annual Reports set forth in the January 13th Resolution and provided a reporting schedule establishing reporting deadlines of sixty (60) days "following the half end of the fiscal year". *See id.* Exhibit 1, Section 6.0.

3. On June 6, 2023, the Energy Bureau issued a Resolution and Order ("June 6th Resolution") taking notice of the filing of the PR-EVAP and, among others, ordering LUMA to report in the Semi-Annual Reports the specific actions that LUMA is taking to assist entities in procuring and implementing federal funds, including specific timelines. June 6th Resolution, pp. 3-4.

4. On February 12, 2024, the Energy Bureau issued a Resolution and Order ("February 12th Resolution") in which it, among others, ordered LUMA to provide within its forthcoming Semi-Annual Report a description of how LUMA plans to further engage with the

² 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, filed on September 1, 2022. On September 2, 2022, LUMA resubmitted the Draft Phase I EV Plan document with certain technical repairs and requested this Energy Bureau to accept this corrected version in substitution of the version submitted on September 1, 2022. See LUMA's Motion Re-Submitting Exhibit 1 Filed on September 1, 2022, with Technical Repairs and Requesting Substitution of Original Exhibit of that date.

public transportation and fleet sectors, especially those located in or serving disadvantaged communities. *See* February 12th Resolution, p. 1.

5. On February 29, 2024, LUMA filed the first PR-EVAP Semi-Annual Report for FY24. *See Motion to Submit Semi-Annual Report in Compliance with Order of January 13, 2023.*

6. On April 23, 2024, the Energy Bureau issued a Resolution and Order ("April 23rd Resolution") ordering LUMA to refile the first FY2024 Semi-Annual Report using the reporting template provided with the April 23rd Order for all PR-EVAP Semi-Annual Reports. *See* April 23rd Resolution, p. 5.³

7. On April 30, 2024, LUMA informed the Energy Bureau that it had completed the development and launch of the Interim EV TOU Rate. *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.

8. On May 24, 2024, LUMA submitted a revised version of its first PR-EVAP FY24 Semi-Annual Report ("FY24 First Semi-Annual Report") using the template included in, and in compliance with, the April 23rd Resolution. *See Motion to Submit a Revised Semi-Annual Report in Compliance with Order of April 23*, 2024.⁴

9. On August 30, 2024, LUMA filed its FY24 Second Semi-Annual Report. See Motion to Submit Second Semi-Annual Report for Fiscal Year 2024, in Compliance with Orders of January 13, 2023, and April 23, 2024.

³ The Energy Bureau further directed LUMA to use the structure detailed in the template and provide all the information laid out in the template, as well as to indicate in the Semi-Annual Report if it does spend any budget or not complete any activities for a specific PR-EVAP action to ensure transparency on progress to-date. *See id.*

⁴ LUMA subsequently filed another version of the report to incorporate minor corrections. *See Motion to Submit Corrected Exhibit 1 to Motion to Submit a Revised Semi-Annual Report in Compliance with Order of April 23, 2024*, filed on May 24, 2024.

10. On February 28, 2025, LUMA filed its FY2025 First Semi-Annual Report as an Exhibit 1 to its *Motion to Submit First Semi-Annual Report for Fiscal Year 2025*.

11. On March 21, 2025, the Energy Bureau issued a Resolution and Order ("March 21st Resolution") in which accepted LUMA's FY2025 First Semi-Annual Report and determined that it "complies with the January 13 Resolution and April 23 Resolution". *See* March 21st Resolution, pp. 2 and 4. In addition, the Energy Bureau indicated that it was seeking additional information on the content of this report and ordered LUMA to provide, within ten (10) days, responses to the following Request for Information ("ROI"):

- 1. Refer page 7 of FY25 first Semi-Annual Report regarding bill inserts for residential customers which states: "However, developing these materials and content is being carefully timed and coordinated in order to align with current programs' objectives and other initiatives."
 - a. Please list the specific programs and their objectives that bill inserts need to be coordinated with.
 - b. Please list the specific "other initiatives" and their objectives that bill inserts need to be coordinated with.
 - c. Please provide the estimated month and year when it will be appropriate for bill inserts to go to residential customers. Please also describe the rationale for the timing.
- 2. Refer to LUMA's partnership with Transporte Sonnell described on page 16 of the FY25 first Semi-Annual Report.
 - a. Please describe the key barriers that Transporte Sonnell has faced in electrifying its fleets.
 - b. What guidance did Transporte Sonnell provide to LUMA on "fleet electrification strategies and available incentives?"
 - c. Please describe the "meaningful steps" toward extending electrification benefits to the communities that need it most.
 - d. Does LUMA plan to introduce any initiatives or programs based on its partnership with Transporte Sonnell or feedback obtained from other fleets? If yes, what is the timeline for offering those programs or initiatives? If not, please explain why not.

- 3. Refer to the non-underserved community customer meetings on page 16 of the FY25 first Semi-Annual Report.
 - a. What EV program strategies did LUMA refine based on these meetings and were those programs refined?
 - b. What infrastructure gaps were identified?
- 4. Refer to the Department of Economic Development and Commerce (DDEC) study on page 17 of the FY25 first Semi-Annual Report.
 - a. By how much did the proposals received through the RFP exceed the budget?
 - b. Did LUMA consider using any available funds from its PR-EVAP budget to support the DDEC study? Please explain why or why not?
- 5. Refer to page 17 of the FY25 first Semi-Annual Report. What has LUMA learned to date regarding EV adoption from the Distribution Planning and Distribution Standards representatives?
- 6. Refer to the discussion of the "internal examination" on page 1i the FY25 first Semi-Annual Report.
 - a. Has LUMA identified any challenges and opportunities from this examination? If yes, please describe each one and explain how LUMA plans to address it. If not, please explain why not.
 - b. Will LUMA report on the findings of the examination within future Semi Annual reports or separately to the Energy Bureau?
 - c. Will the results inform LUMA's proposed investments in the forthcoming rate case? Please explain why or why not.
- 7. Refer to the next steps on page 22 of the FY25 first Semi-Annual Report.
 - a. Please summarize what the "robust framework" will entail and when LUMA will finish the framework.
 - b. How does LUMA plan to address the barriers to fleet electrification, considering the survey results?
- 8. When will the charging behavior study launch?
- 9. Refer to page 28 of the FY25 first Semi-Annual Report that provides charging insights from the EV TOU Rate pilot.
 - a. Will LUMA conduct outreach to pilot participants to understand why they are not charging their vehicles off-peak before changing the charging period structure?
 - b. What methodology will LUMA use to develop the new charging period?

- c. Will the new charging period be designed reduce to distribution system peak? If not, please explain.
- d. Does LUMA plan to offer the new charging period structure in addition to the existing EV TOU rate? If yes, please explain whether offering two TOU rates will reduce the statistical significance of the results of the charging data for the pilot.
- 10. On page 32 of the FY25 first Semi-Annual Report LUMA describes "next steps" related to taking an active role in infrastructure development.
 - a. Please describe what is meant by "taking a leadership position in the development of the necessary infrastructure to support EV adoption."
 - b. Is LUMA planning to develop rebates or other financial incentives to customers to support the purchase of charging equipment?
 - c. Is LUMA planning to install, own, and operate charging equipment?
- 11. Refer to Action 2 on pages 34 and 35 of the FY25 first Semi-Annual Report.
 - a. Explain how LUMA plans to "facilitate access of level 2 chargers to customers."
 - b. Provide a list of all new programs/incentives for businesses to contribute to the charging infrastructure.
 - c. Will LUMA make a filing with the Energy Bureau for approval of new programs/incentives? If yes, what is the anticipated filing date. If not, please explain why not.
- 12. On page 17 of LUMA's Final Phase I EV Plan, filed May 1, 2023, LUMA states that its "role is not to purchase, own and/or operate charging infrastructure." Please confirm this still the case.

Id., pp. 2-3.

III. Submittal of Responses to ROI

12. In compliance with the March 21st Resolution, LUMA hereby submits its responses

to the ROI. See Exhibit 1.

13. LUMA takes this opportunity to inform the Energy Bureau that it looks forward to

continuing to communicate its EV-related efforts in its forthcoming update of the PR-EVAP in accordance with the plans set forth in the FY24 Second Semi-Annual Report of August 30, 2024.

See Motion to Submit Second Semi-Annual Report for Fiscal Year 2024, in Compliance with

Orders of January 13, 2023, and April 23, 2024, Exhibit 1, p. 40.

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the

aforementioned and accept Exhibit 1 as its responses to the ROI in, and in compliance with, the

Energy Bureau's Resolution and Order of March 21, 2025.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 31st day of March 2025.

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; apietrantoni@pmalaw.com; azayas@azeng.net; brightsunpr@gmail.com; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; carlosxcedeno@gmail.com; clrivera@caguasexpressway.com; flota@caguasexpressway.com; CR.Tejera@ddec.pr.gov; dacosta@aggpr.com; cnegrette@solrenew.com; daniel.perez@totalenergies.pr; dcordero@group-em.com; direxec@ciapr.org; divine.energy@hotmail.com; ecruz@pmalaw.com; eduardo.pinera@toyota.com; Edwin.Acevedo@ddec.pr.gov; emelyies.torres@toyota.com; epenergypr@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@pmalaw.com; jorrodriguez@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; l.marcano@aconer.org; kenan.d.davila@sargentlundy.com; kkoch@tesla.com; Marangelly.Cruz@toyota.com; lsundeen@tesla.com; luisgmoreno@gmail.com; mlandron@plazaad.com; mpietrantoni@pmalaw.com; marilyn.maldonado@toyota.com; nmontes@ccmpr.com; nrodriguez@senado.pr.gov; nannette.berrios@solpetroleum.com; omundo@plazalasamericas.com; Ochavez@Padigm.com; odette@grupofernandezpr.com; patlopez00@gmai1.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;

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Exhibit 1

Responses to ROI in Resolution and Order of March 21, 2025

Responses to March 21, 2025, Request

March 31, 2025



List of Responses and Attachments

Response ID	Document Type	Response Subject
ROI-LUMA-MI-2021-0013-20250321-PREB-001	Response in PDF	FY25 First Semi-Annual Report
ROI-LUMA-MI-2021-0013-20250321-PREB-002	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-003	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-004	Response in PDF	
	Attachment 01	
ROI-LUMA-MI-2021-0013-20250321-PREB-005	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-006	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-007	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-008	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-009	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-010	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-011	Response in PDF	
ROI-LUMA-MI-2021-0013-20250321-PREB-012	Response in PDF	



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-001

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- 1. Refer page 7 of FY25 first Semi-Annual Report regarding bill inserts for residential customers which states: "However, developing these materials and content is being carefully timed and coordinated in order to align with current programs' objectives and other initiatives."
 - a. Please list the specific programs and their objectives that bill inserts need to be coordinated with.
 - b. Please list the specific "other initiatives" and their objectives that bill inserts need to be coordinated with.
 - c. Please provide the estimated month and year when it will be appropriate for bill inserts to go to residential customers. Please also describe the rationale for the timing.

RESPONSE

Answer for sections **a** and **b**.

LUMA uses bill inserts to support customers that might not be able to receive information from LUMA by other means, including digital communication channels. Since Electric Vehicles ("EV") customers tend to be more tech-savy that prefer to receive information via email, social media and other digital platforms, the bill inserts have not been used yet to share information about these programs. However, LUMA plans to continue using bill inserts to promote energy efficiency efforts wich might include the Time-of-use rates for EV and other potentially cost-saving programs that benefit our customers. Future bill insert efforts for EV programs will align to the goals of the program as defined by LUMA and applicable public policy.

Answer for section c.

The LUMA EV team will continue to evaluate the potential use of bill inserts once broader customer enrollment is achieved or residential-specific EV initiatives are developed.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-002

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- Refer to LUMA's partnership with Transporte Sonnell described on page 16 of the FY25 first Semi-Annual Report.
 - a. Please describe the key barriers that Transporte Sonnell has faced in electrifying its fleets.
 - b. What guidance did Transporte Sonnell provide to LUMA on "fleet electrification strategies and available incentives?"
 - c. Please describe the "meaningful steps" toward extending electrification benefits to the communities that need it most.
 - d. Does LUMA plan to introduce any initiatives or programs based on its partnership with Transporte Sonnell or feedback obtained from other fleets? If yes, what is the timeline for offering those programs or initiatives? If not, please explain why not.

RESPONSE

a. LUMA has held multiple meetings with Transporte Sonnell to discuss their plans for fleet electrification, federal funding applications, initiatives, and overall strategy. These discussions have addressed key challenges, including the installation of charging infrastructure and its associated costs, as well as logistical considerations for routes in mountainous and rural municipalities, concerns about grid reliability, and the need to train mechanics to service commercial electric vehicles.

Notwithstanding these discussions, LUMA has reached out to Transporte Sonnel to provide greater visibility related to the barriers faced, however, Transporte Sonnell, could not provide the answer in the allotted time.

- b. Discussions on fleet electrification strategies and incentives included the following:
 - The implementation of route simulation technology for optimal battery efficiency planning.



- The opportunity to access EV infrastructure and incentive programs.
- Suggestions to create technical design templates to guide customers and fleet operators.
- Interest in time-of-use incentives tailored for fleets, especially those charging overnight or during mid-day off-peak periods.
- The importance of collaboration in educational outreach efforts to enhance understanding of vehicle operation and charging components.

Further, as stated above in response to request num. 2(a), LUMA similarly intends to request Transporte Sonnell's updated guidance as it relates to EV electrification and incentives.

c. Through its engagement with Transporte Sonnell, LUMA obtained valuable insights regarding the significant infrastructure challenges that fleet operators face when transitioning to electric vehicles. Specifically, Transporte Sonnell highlighted the urgent need for improvements in public infrastructure, as well as the high costs associated with necessary upgrades to critical components such as transformers, substations and cabling improvement costs. The latter are costs that, under current practices, are expected to be borne entirely by the applicant.

These conversations allowed the LUMA EV team to better understand the practical and financial obstacles confronting organizations committed to fleet electrification, especially those serving disadvantaged communities. As a result, LUMA has been able to align and refine its strategic priorities to focus on the most pressing issues faced by early adopters. This includes exploring opportunities to reduce the cost burden on applicants and to promote more equitable access to EV infrastructure and associated benefits across the island.

Additionally, LUMA worked collaboratively with Transporte Sonnell by signing the electric utility partnership template, a crucial component required for the application to the United States Environmental Protection Agency's Clean School Bus Rebate Program. The foregoing strengthened their position to secure external funding which would further enable both vehicle and infrastructure integrations. This support reflects LUMA's commitment to advancing transportation electrification in ways that directly benefit underserved communities and help unlock broader federal resources for Puerto Rico.

- d. Yes, LUMA is currently considering new offerings that integrate lessons learned from the Transporte Sonnell collaboration and other fleet engagements.
 - Exploration of a commercial Time of Use ("TOU") pilot rate structure, designed to incentivize off-peak charging behaviors.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-003

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- Refer to the non-underserved community customer meetings on page 16 of the FY25 first Semi-Annual Report.
 - a. What EV program strategies did LUMA refine based on these meetings and were those programs refined?
 - b. What infrastructure gaps were identified?

RESPONSE

- a. The discussions with non-underserved community members provided key insights into optimizing EV charging strategies as described below
 - Relying solely on passive TOU rates without implementing managed charging can potentially lead to moving demand spikes to later hours, rather than mitigating or smoothing demand as customers are incentivized to charge simultaneously usually at the start of the off or shoulder peak periods. To mitigate these unintended impacts of shifting peak loads and ensure grid stability, managed charging has been discussed as a preferred method to help alleviate some of these unintended consequences.
- b. The identified infrastructure gaps are largely attributed to the insufficient availability of public charging stations and the significant costs associated with the infrastructure upgrades required to support charger deployment.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-004

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- 4. Refer to the Department of Economic Development and Commerce ("DDEC") study on page 17 of the FY25 first Semi-Annual Report.
 - a. By how much did the proposals received through the RFP exceed the budget?
 - b. Did LUMA consider using any available funds from its PR-EVAP budget to support the DDEC study? Please explain why or why not?

RESPONSE

- a. Please refer to Attachment 01 vehicle DDEC letter providing the requested information).
- b. LUMA evaluated the use of available funds to support the study but determined to defer allocation for now due to the substantial gap between DDECs budget and the RFP responses. After evaluating the RFP it was suggested to review and reduce the scope of work and reissue the RFP to obtain new proposals from participating firms. At this moment the new RFP has not been issued.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-005

SUBJECT

FY25 First Semi-Annual Report

REQUEST

5. Refer to page 17 of the FY25 first Semi-Annual Report. What has LUMA learned to date regarding EV adoption from the Distribution Planning and Distribution Standards representatives?

RESPONSE

The primary purpose of the internal working sessions with the Distribution Planning and Distribution Standards teams was and continues to be to maintain alignment around the growing adoption of EVs in Puerto Rico. Recognizing the implications EV adoption may have on the electrical grid, these sessions are designed to facilitate the early integration of EV-related load growth into the utility's broader planning framework.

Through these discussions, LUMA emphasized the importance of incorporating EV load forecasts into medium- and long-term distribution system plans to enable grid reliability and stability, optimize infrastructure investments and cost efficiency and rate stability, among others.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-006

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- Refer to the discussion of the "internal examination" on page 18 of the FY25 first Semi-Annual Report.
 - a. Has LUMA identified any challenges and opportunities from this examination? If yes, please describe each one and explain how LUMA plans to address it. If not, please explain why not.
 - b. Will LUMA report on the findings of the examination within future Semi Annual reports or separately to the Energy Bureau?
 - c. Will the results inform LUMA's proposed investments in the forthcoming rate case? Please explain why or why not.

RESPONSE

a. Yes, LUMA has identified several critical challenges and opportunities through its internal examination of infrastructure readiness in the context of EV adoption.

Key Challenges Identified:

- Insufficient Public Charging Infrastructure: The lack of publicly accessible charging stations remains a significant barrier to widespread EV adoption. This reality limits charging accessibility for residents and discourages potential EV buyers.
- Grid Infrastructure Limitations: Existing distribution infrastructure particularly transformers, feeders, and substations are not uniformly equipped to accommodate the additional load presented by EV charging, especially in commercial corridors with concentrated demand.
- Localized Grid Constraints Impacting Stakeholders: In areas like Kennedy Avenue, where there is a high concentration of auto dealerships, the installation of fast chargers by one dealership has exhausted local electrical



capacity. As a result, neighboring dealerships are now faced with the burden of financing costly infrastructure upgrades to meet Original Equipment Manufacturer ("OEM") requirements. These OEMs mandate that dealerships demonstrate adequate on-site charging capabilities as a condition for receiving EV inventory, thereby complicating the importation and sale of EVs on the island.

Opportunities Identified:

- These findings presented above provide an opportunity for LUMA to engage more proactively in coordinated planning efforts with key stakeholders, including commercial clusters, fleet operators, and municipal planners, to facilitate shared infrastructure investment and load forecasting.
- LUMA will also explore targeted capacity studies and localized hosting capacity mapping to support smarter, more efficient deployment of EV charging infrastructure.
- b. Yes, LUMA will continue to report all findings in the upcoming semi-annual reports.
- c. No. LUMA does not plan to include the proposed investments in the forthcoming rate case.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-007

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- 7. Refer to the next steps on page 22 of the FY25 first Semi-Annual Report.
 - a. Please summarize what the "robust framework" will entail and when LUMA will finish the framework.
 - b. How does LUMA plan to address the barriers to fleet electrification, considering the survey results?

RESPONSE

- a. The "robust framework" referenced in the FY25 First Semi-Annual Report refers to LUMA's comprehensive approach to understanding and addressing EV adoption challenges in an integrated and holistic manner. This framework considers:
 - Customer charging behaviors and load patterns;
 - Infrastructure limitations and upgrade needs;
 - Coordination across multiple initiatives (e.g., TOU rates, managed charging, public infrastructure);
 - Incentives and policy alignment;
 - Stakeholder feedback.

LUMA is currently refining this framework with the goal of finalizing it, undergoing engagement with key internal and external stakeholders and reporting next steps in upcoming Semi-Annual Reports. It will serve as the foundation for the design and implementation of future EV programs and rate structures.

b. In response to both survey findings and direct stakeholder engagement, LUMA has identified several strategies to reduce barriers to fleet electrification. Notwistanding, all initiatives identified are subject to the appropriate level of funding and further analysis into market conditions. The initiatives considered are the following:

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- Commercial TOU Rate Design: LUMA is considering designing a charger-only TOU rate tailored to commercial customers. This rate will incentivize charging during daytime off-peak hours (8:00 AM to 5:00 PM), when vehicles are typically idle at workplace depots. This shift not only benefits fleet operators but also supports grid stability by spreading load across less congested periods.
- Refined Residential TOU Periods: LUMA is considering reassesing the incentives for the residential shoulder period for more customers to charge between the hours of 11:00 PM – 7:00 AM to further discourage on-peak charging and align customer behavior with system needs.
- **Managed Charging Integration:** Recognizing that static TOU pricing can lead to new demand peaks, LUMA is actively exploring managed charging solutions to optimize load while maintaining a positive user experience.
- **Public Charging Deployment:** In response to consistent stakeholder feedback, LUMA is evaluating the feasibility of installing public charging infrastructure, particularly in high-traffic areas.
- **Infrastructure Upgrade Incentives:** LUMA is exploring the design of programs that offset the costs of infrastructure upgrades "in front of the meter." This approach is modeled after successful initiatives by peer utilities and is intended to reduce the financial burden on fleets and commercial entities.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-008

SUBJECT

FY25 First Semi-Annual Report

REQUEST

8. When will the charging behavior study launch?

RESPONSE

LUMA is currently finalizing the necessary administrative and documentation processes required to initiate the charging behavior study. The study is expected to launch during fiscal year 2026.

Electric Vehicles

Response: ROI-LUMA-MI-2021-0013-20250321-PREB-009

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- Refer to page 28 of the FY25 first Semi-Annual Report that provides charging insights from the EV TOU Rate pilot.
 - a. Will LUMA conduct outreach to pilot participants to understand why they are not charging their vehicles off-peak before changing the charging period structure?
 - b. What methodology will LUMA use to develop the new charging period?
 - c. Will the new charging period be designed reduce to distribution system peak? If not, please explain.
 - d. Does LUMA plan to offer the new charging period structure in addition to the existing EV TOU rate? If yes, please explain whether offering two TOU rates will reduce the statistical significance of the results of the charging data for the pilot.

RESPONSE

a. Yes. LUMA has already begun engaging with pilot participants to better understand their charging behaviors. Through ongoing customer support interactions, including direct phone calls, several participants have indicated that the current TOU rate structure—set between 9:00 AM and 5:00 PM—does not align with their daily routines or charging needs, as this is typically when most individuals are at work or away from home.

Additionally, non-participating customers have expressed reluctance to join the program for the same reason, noting that the current off-peak window does not fit their schedules. This feedback has informed LUMA's consideration of changes to better align program design with customer behavior while still advancing grid optimization objectives.

- b. LUMA is considering a revised TOU structure using a dual approach:
 - For residential customers, an improved incentive under consideration is for the shoulder period between 11:00 PM to 5:00 AM, which reflects a time when most vehicles are parked and can be charged without interfering with daily usage. This period also avoids the grid's evening peak demand.



- For chargers placed in commercial locations, fleets and workplace charging scenarios, a 9:00 AM to 5:00 PM off-peak structure is being evaluated. This timing aligns with when many vehicles remain stationary during business hours and helps shift charging load away from critical peak periods.
- In both structures having either a baseline or control strategy established to evaluate the efficacy of the approaches will be crucial in determining the impacts of interventions as truly effective in producing the de results from participants and for the benefit of grid management.
- c. Yes. The revised TOU periods are specifically designed to reduce demand during known system peak hours, thereby mitigating the risk of localized overloads and supporting grid stability. The goal is to create behavioral incentives that align customer charging patterns with the needs of the distribution system.

Furthermore, by providing customers with the opportunity to charge their vehicles during the day between 9:00 AM and 5:00 PM while they are at work or visiting commercial locations, the program reduces the likelihood that customers will need to initiate charging upon returning home in the evening. This strategy not only supports grid efficiency but also enhances customer convenience and helps to avoid additional load during the evening peak.

d. No. LUMA does not plan to offer both the existing and new TOU structures simultaneously. Instead, the EV team is preparing to transition to a refined TOU framework that applies differentiated time windows for residential and commercial customers. This approach will ensure clarity in program design and maintain the integrity and statistical consistency of the data collected through the pilot.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-010

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- 10. On page 32 of the FY25 first Semi-Annual Report LUMA describes "next steps" related to taking an active role in infrastructure development.
 - a. Please describe what is meant by "taking a leadership position in the development of the necessary infrastructure to support EV adoption."
 - b. Is LUMA planning to develop rebates or other financial incentives to customers to support the purchase of charging equipment?
 - c. Is LUMA planning to install, own, and operate charging equipment?

RESPONSE

a. LUMA recognizes that the lack of adequate infrastructure—such as public charging stations and essential grid hardware—is one of the primary barriers slowing EV adoption in Puerto Rico. As such, taking a leadership position means that LUMA intends to actively contribute to the planning, development, and deployment of infrastructure solutions that enable widespread and equitable EV adoption across the island.

This leadership role will involve:

- Provide effective advise on the the installation of public charging infrastructure, particularly in underserved and high-traffic areas, to close accessibility gaps and increase user confidence in EV viability. LUMA will leverage its knowledge of the grid and its constraints to facilitate the penetration of EVs in Puerto Rico.
- Identifying and assisting in the upgrade critical grid components, including transformers, feeders, and substations, to ensure that the system can safely and reliably accommodate increased EV load without triggering faults or service disruptions.
- Exploring financial support mechanisms, such as incentives or cost-sharing programs, to assist businesses and commercial customers in offsetting the costs of



"in front of the meter" infrastructure upgrades required for Electric Vehicle Supply Equipment ("EVSE") deployment.

These efforts will follow best practices observed in other jurisdictions and utilities, which have demonstrated the effectiveness of proactive utility engagement in overcoming adoption barriers and accelerating market transformation.

- b. LUMA believes it would be appropriate and beneficial to offer financial incentives to support customer acquisition of Level 2 chargers, particularly to accelerate residential and commercial EV adoption. However, any such initiative must be carefully designed with financial responsibility in mind, ensuring an appropriate balance between program costs and revenue recovery for the utility.
- c. LUMA is evaluating the possibility of sponsoring the installation and operation of public charging infrastructure, following the example of other utilities that have taken similar steps to accelerate EV adoption in their jurisdictions. Public charging availability has consistently been identified as a critical barrier in Puerto Rico, and LUMA recognizes the importance of utility involvement in addressing this gap.

While no formal program is currently in place, LUMA views public charging deployment as a strategic opportunity to support equitable access, and to help catalyze broader market transformation.

All planning efforts will be guided by fiscal responsibility and aligned with best practices, with a focus on maximizing public benefit, grid efficiency, and long-term sustainability.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-011

SUBJECT

FY25 First Semi-Annual Report

REQUEST

- 11. Refer to Action 2 on pages 34 and 35 of the FY25 first Semi-Annual Report.
 - a. Explain how LUMA plans to "facilitate access of level 2 chargers to customers."
 - b. Provide a list of all new programs/incentives for businesses to contribute to the charging infrastructure.
 - c. Will LUMA make a filing with the Energy Bureau for approval of new programs/incentives? If yes, what is the anticipated filing date. If not, please explain why not.

RESPONSE

a. LUMA is committed to engaging with EV stakeholders in order to achieve greater EV charging options in an effective, safe and coordinated manner. LUMA will continue to engage with market players whose objective is to deploy charging hardware and infrastructure to further leverage our position as a trusted advisor and facilitator of EV growth in Puerto Rico. We expect that these efforts promote greater access of level 2 chargers to customers —both residential and commercial— thus, accelerating broader EV adoption.

Reference Model: Installation and Rental of Residential Chargers

- b. At this time, LUMA does not have any active or newly launched programs or incentives specifically designed for businesses to contribute to EV charging infrastructure. The primary limiting factor is the need to secure dedicated funding to support the development and implementation of such initiatives.
- c. At this time, no filing has been scheduled, as LUMA is still in the process of evaluating viable program models, identifying potential funding sources, and aligning proposed initiatives with the broader electric vehicle strategy for Puerto Rico.



Response: ROI-LUMA-MI-2021-0013-20250321-PREB-012

SUBJECT

FY25 First Semi-Annual Report

REQUEST

12. On page 17 of LUMA's Final Phase I EV Plan, filed May 1, 2023, LUMA states that its "role is not to purchase, own and/or operate charging infrastructure." Please confirm this still the case.

RESPONSE

LUMA continues to be committed to be a trusted advisor and facilitator in the EV ecosystem in order to enable the adoption of EVs in Puerto Rico alongside other market players. LUMA's role remains unchanged, however, its commitment to greater EV adoption continues to expand as it works with stakeholders like Transporte Sonnell, DDEC and others who are called to make a lasting impact on EV adoption in Puerto Rico.





March 28, 2025

Puerto Rico Energy Bureau

RE: NEPR-MI-2021-0013 – DDEC'S ANSWER TO MARCH 21, 2025, RFI RESOLUTION AND ORDER

The Energy Policy Program of the Department of Economic Development and Commerce (DEDC) reviewed the Puerto Rico Energy Bureau the Request for Information (RFI) to LUMA, issued in its March 21, 2025, Resolution and Order. In section II.4.a the following information was requested:

Refer to the Department of Economic Development and Commerce (DDÉC) study on page 17 of the FY25 first Semi-Annual Report.

a. By how much did the proposals received through the RFP exceed the budget?

On March 21, 2024, the DEDC issued RFP-DDEC-EPP-2024-001 requesting proposals to carry out an Electric Vehicle Market Study of Puerto Rico. Funding for the study was agreed to come from DDEC's State Energy Program (SEP). The SEP identified \$100,000. Therefore, to answer section 11.4.a of the RF1 we are considering \$100,000 as the budget set for the study.

Before the proposal's presentation deadline, of April 25, 2024, the DDEC received four (4) proposals. The proponents name, amount proposed and amount exceeding the budget are as follows:

	Proponent	Proposal amount	Amount exceeding the \$100,000 budget
1	Abexus Analytics	\$868,050.00	\$768,050.00
2	V2A Consulting	\$720,000.00	\$620,000.00
3	Steer Davies & Gleave Limited	\$577,748.00	\$477,748.00
4	ScottMadden Management Consultants	\$3,471,158.60	\$3,371,158.60

The RFP was not adjudicated since the DDEC decided it was in our best interest not to proceed with the consideration and award and in accordance with section 10.11 of the RFP.

Should you require any further details to assist LUMA in complying with the RFI you may contact us at energydirector@ddec.pr.gov

Cordially,

Mariamelia Suciro Alvarez

Mariamelia Sueiro Álvarez, Esq. Interim Director Energy Policy Program



