

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

IN RE: REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY  
INTEGRATED RESOURCE PLAN

CASE NO.: NEPR-AP-2023-0004

SUBJECT: LUMA’s Response to  
*Informative Motion and Request for Order to  
Incorporate Genera into the IRP Process*

NEPR

Received:

Apr 14, 2025

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LUMA’S RESPONSE TO *INFORMATIVE MOTION AND REQUEST FOR ORDER TO  
INCORPORATE GENERA INTO THE IRP PROCESS*

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and LUMA Energy ServCo, LLC (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On April 2, 2025, Genera PR, LLC (“Genera”) filed an *Informative Motion and Request for Order to Incorporate Genera into the IRP Process* before the Puerto Rico Energy Bureau (“Energy Bureau”). Therein, Genera claimed that LUMA had not sought its input while developing the Integrated Resource Plan (“IRP”) to be filed in 2025. In addition, it states sending a communication on February 20, 2025, to LUMA on its engagement on the 2025 IRP that remained unanswered. Thus, it requested the Energy Bureau to immediately incorporate Genera into the 2025 IRP process and instruct LUMA to secure Genera’s input and feedback in energy generation matters before presenting a final version.<sup>1</sup>

2. LUMA differs from Genera’s characterization of their involvement in LUMA’s development of the 2025 IRP to be submitted to the Energy Bureau. First, Genera has been notified of each and every one of LUMA’s submissions in this instant proceeding since it filed a Notice of Appearance in June 2024. Second, LUMA has responded to Genera’s February 2025 communication, rebuking any claim of lack of participation. *See Exhibit 1.*

3. As explained in LUMA’s correspondence to Genera, since July 2023, LUMA and Genera have held four (4) meetings to discuss and gather information about Genera’s proposed projects, retirement schedule, unit emissions, and fuel conversion plans, amongst other relevant information. These meetings have been significant in ensuring that LUMA’s planning assumptions accurately reflect the system's current and future conditions. Notably, and specifically, in April

<sup>1</sup> Although Genera stated in the Certificate of Service that it notified LUMA’s legal representation of the motion via email, the undersigned was not informed and learned of Genera’s submission through a third-party publication over a week later.



2024, LUMA shared and discussed the generation and retirement assumptions developed for the 2025 IRP with Genera.

4. Subsequently, in August 2024, LUMA contacted Genera to request information regarding the possibility of converting some units to operate using biodiesel, while other units continue operating on the original fuel resource. This information was requested to incorporate Genera's responses into the 2025 IRP modeling. In October 2024, Genera responded and submitted a series of questions related to the 2025 IRP revised scenarios and characteristics and assumptions of the 2025 IRP base model. Thereafter, in January 2025, after completing the first interim filing, LUMA responded to Genera with the latest developments and updates, ensuring ongoing communication and maintaining transparency.

5. Moreover, LUMA has invited Genera to contribute to LUMA's Solutions for the Energy Transformation of Puerto Rico ("SETPR")<sup>2</sup>, a collaborative process developed to gather feedback on Puerto Rico's energy future from customers and stakeholders from different industries and sectors. To date, LUMA has hosted three rounds of SETPR meetings. Unfortunately, Genera has not attended any of those meetings, although having registered. It is LUMA's expectation for Genera to participate in the fourth round of meetings that will be held in April 2025.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned for all purposes.

**WE HEREBY CERTIFY** that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to the Puerto Rico Electric Power Authority: [lionel.santa@prepa.pr.gov](mailto:lionel.santa@prepa.pr.gov) and through its attorneys of record Mirelis Valle-Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net); and Alexis G. Rivera Medina, [arivera@gmlex.net](mailto:arivera@gmlex.net); and Genera PR, LLC, through its attorney of record Luis R. Román Negrón, [lrn@roman-negrom.com](mailto:lrn@roman-negrom.com).

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on April 14, 2025.

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<sup>2</sup> See SETPR Calendar of Events First Round of Meetings October and November 2023 <https://setpr.com/eventos/month/2023-10/> and <https://setpr.com/eventos/month/2023-11/>, Second Round of Meetings January 2024: <https://setpr.com/eventos/month/2024-01/>, Third Round of Meetings January 2025: <https://setpr.com/eventos/month/2025-01/>.





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*/s/ Yahaira De la Rosa Algarín*  
Yahaira De la Rosa Algarín  
PR Bar No. 18,061  
Yahaira.DelaRosa@us.dlapiper.com



*Exhibit 1*



April 7, 2025

**To: Genera PR LLC**

Attention: Ricardo Palléns Cruz, Esq.  
VP EEHS & Regulatory  
American International Plaza  
250 Ave. Luis Muñoz Rivera, Suite 1200  
San Juan, PR 00918

**RE: LUMA's Letter to Genera, re: Genera's Integrated Resource Plan Role**

Dear Mr. Palléns Cruz:

We acknowledge receipt of your letter of February 20, 2025, whereby you request Genera PR, LLC ("Genera") be "formally included in the [2025 Integrated Resource Plan ("IRP")] process to actively contribute to its development" and be granted access to "all relevant information concerning the IRP discussions and planning, including, but not limited to[,] any data, reports, models, and analyses related to energy generation and O&M services."

Since July 2023, LUMA and Genera have held 4 meetings to discuss and gather information about Genera's proposed projects, retirement schedule, unit emissions, and fuel conversion plans, amongst other relevant information. These meetings have been highly significant in ensuring that LUMA's planning assumptions accurately reflect the system's current and future conditions. On April 19, 2024, LUMA shared and discussed with Genera the assumptions developed for the 2025 IRP. Since then, LUMA has been working on completing the 2025 IRP modeling, which we have provided regular updates filed with the Puerto Rico Energy Bureau ("PREB"), including interim filings made on November 11, 2024, and March 27, 2025. These interim filings include the preliminary results of the 2025 IRP Portfolios A through J (Scenarios 1 through 10), the Preliminary Resource Plan, an overview of the current condition of the Transmission and Distribution System and the Transmission Planning for the 2025 IRP Preferred Resource Plan.<sup>1</sup>

Moreover, on August 19, 2024, LUMA contacted Genera via email to request information regarding the possibility of converting some units to biodiesel, while other units continue operating on the original fuel. This information was requested with the intention of incorporating Genera's responses into the 2025 IRP modeling. On October 18, 2024, Genera provided its answers with the caveat that responses should "not be construed as an endorsement or support of using biodiesel as an alternative fuel in the IRP analysis." Together with their response, Genera submitted a series of questions related to the 2024 IRP Revised Scenarios and Characteristics and assumption of the 2025 IRP base model. On January 24, 2025, after completing the first interim filing, LUMA responded to Genera with the latest developments and updates ensuring ongoing communication and maintaining transparency.

Genera has also had the opportunity to contribute to the development of the IRP through LUMA's Solutions for the Energy Transformation of Puerto Rico ("SETPR"), a collaborative process developed to gather feedback on Puerto Rico's energy future from customers and stakeholders from different industries

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<sup>1</sup> On June 6, 2024, Genera filed a Notice of Appearance with the Puerto Rico Energy Bureau's ("PREB") docket NEPR-AP-2023-0004 and has received notifications of all orders, resolutions, and filings related to the IRP.





and sectors. As of January 2025, LUMA has hosted three rounds of SETPR meetings. To date, Genera has not attended any of these meetings, despite being invited by LUMA and having registered to attend. The fourth round of SETPR meetings are currently scheduled for the week of April 21, 2025. It is our sincere hope you or other members of Genera's team will have a chance to participate.

LUMA, as agent of PREPA under the T&D OAM,<sup>2</sup> is exclusively responsible for developing and proposing and IRP. In undertaking this obligation, LUMA seeks to ensure all stakeholders are treated equitably and in a non-discriminatory manner.<sup>3</sup> While Genera is responsible for the operation and maintenance of legacy thermal generation assets owned by PREPA by virtue of the TGF OMA,<sup>4</sup> such responsibility does not entail a right to greater access to information related to the IRP when compared to other stakeholders or generators.

LUMA values and appreciates Genera's collaboration and contribution as a key stakeholder in Puerto Rico's electric system. With this in mind, and in full spirit of collaboration, we propose a meeting between our technical teams to clarify any questions Genera may have regarding the current status of the proposed 2025 IRP, new energy public policy changes and updates on the condition of Genera's fleet. Kindly suggest three convenient dates to schedule a meeting.

Please contact us should you have any questions.

Sincerely,

*Alejandro J. Figueroa*

**Alejandro J. Figueroa Ramírez**  
Chief Regulatory Officer

cc: Winnie Irizarry, CEO and President, Genera-PR; [winnie@genera-services.com](mailto:winnie@genera-services.com)  
Francisco Prego, Vice President T&D OMA Contract Management, LUMA; [francisco.prego@lumapr.com](mailto:francisco.prego@lumapr.com)  
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María Giovanna Dessy, Manager IRP, LUMA; [mariagiovanna.dessy@lumapr.com](mailto:mariagiovanna.dessy@lumapr.com)

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<sup>2</sup> The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement executed on June 22, 2020, by and amongst the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, "LUMA").

<sup>3</sup> See T&D OMA, Annex I, Schedule I. See, also, LUMA System Operating Principles dated February 23, 2021, § 5.3.

<sup>4</sup> The Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("TGF OMA" also known as "LGA OMA"), executed by and amongst GeneraPR LLC, the Puerto Rico Electric Power Authority ("PREPA") and the Puerto Rico Public-Private Partnerships Authority ("P3A").

