

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

NEPR

Received:

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IN RE:
IN RE: REVISIÓN DEL PROGRAMA
COMPRENSIVO DE MANEJO DE
VEGETACIÓN DE LA AUTORIDAD DE
ENERGÍA ELÉCTRICA

CASE NO. NEPR-MI-2019-0005

**SUBJECT: Motion Submitting Vegetation
Management Progress Report for the Third
Quarter of Fiscal Year 2025**

**MOTION SUBMITTING VEGETATION MANAGEMENT PROGRESS REPORT
FOR THE THIRD QUARTER OF FISCAL YEAR 2025**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), through the undersigned legal counsel, respectfully submits the following:

1. On May 24, 2024, LUMA submitted to the Puerto Rico Energy Bureau (“Energy Bureau”) the proposed budget for the Transmission and Distribution System (“T&D Budget”), developed by LUMA. *See Request for Approval of T&D Budgets and Submission of GenCo Budgets for FY2025 and Budget Allocations for the Electric Power System*, filed by LUMA (“FY2025 Budget Submission”) in Case No. NEPR-MI-2021-0004, *In Re: Review of LUMA’s Initial Budgets*.

2. On June 26, 2024, this Energy Bureau issued a Resolution and Order regarding the FY2025 Budget Submission filed by LUMA on May 24, 2024, in Case No. NEPR-MI-2021-0004 (“June 26th Order”). After evaluating the individual budgetary expenditures proposed by LUMA, Genera PR, LLC (“Genera”), and the Puerto Rico Electric Power Authority (“PREPA”), the Energy Bureau modified the respective proposed FY2025 System Budgets, as established in Attachments A through F of the June 26th Order. Among the modifications, this Energy Bureau

directed “an increase in the non-federally funded budget allocation for Vegetation Management from \$50 million to \$63.507 million,”¹ including an increase of \$1.9 million for the Fire Mitigation Program, and fully de-prioritized the Billing Accuracy and Back Office program for FY2025. The Energy Bureau approved the modified budgets subject to additional reporting requirements established in Attachments G and H of the June 26th Order. In what is pertinent to the present motion, this Energy Bureau ordered LUMA to provide “comprehensive monthly updates on vegetation management activities, beginning August 1, 2024, using the Reporting Templates of Attachment G” to the June 26th Order. *See* June 26th Order, p. 7.

3. After several procedural events, on August 8, 2024, the Energy Bureau issued a Resolution and Order in Case No. NEPR-MI-2021-0004, whereby it ordered LUMA to utilize the template in Attachment A for the quarterly Vegetation Management Progress Report (“August 8th Order”). The Energy Bureau also ordered that the Vegetation Management Progress Reports (“VM Progress Reports”) would be due within 45 days after the end of each quarter, beginning with Q4 of FY2024 (August 15, 2024). Importantly, the Energy Bureau further determined that the reports would be filed in this instant proceeding, and LUMA would be relieved of filing the Vegetation Clearing Report in Case No. NEPR-MI-2021-0004.

4. On August 13, 2024, LUMA filed an *Urgent Motion Requesting Extension of Time to Submit Vegetation Management Progress Report for the Fourth Quarter of Fiscal Year 2024*, requesting an extension of time until August 21, 2024, to file the VM Progress Report for the Fourth Quarter of Fiscal Year 2024 (“Q4 Vegetation Progress Report”).

5. On August 16, 2024, the Energy Bureau issued a Resolution and Order granting LUMA until August 21, 2024, to submit the Q4 Vegetation Progress Report (“August 16th Order”).

¹ *See* June 26th Order, p. 6.

6. On August 21, 2024, LUMA filed the *Motion Submitting Vegetation Management Progress Report for the Fourth Quarter of Fiscal Year 2024* whereby it submitted the Vegetation Management Report corresponding to Q4 of Fiscal Year 2024 (“August 21st Motion”). Therein, LUMA requested until Q1 FY2025 to report on the methodology for the newly included “Urban/Rural Site” column. LUMA also provided detailed explanations to respond to the Energy Bureau’s request for additional data, including instances where clarifications were warranted or the information would not be available, for the Energy Bureau’s consideration.

7. Specifically, LUMA requested clarification on whether raw data could be provided for the “Resources Assigned & Their Classifications” column in all tables, the specific information required in the “Recommendations for Future VM” column in all tables except for the “Substations,” and the extent of the information requested in the “LUMA Labor Required” column in the “Distribution Lines” table and in the “Photos Before/After” column in all tables. Further, LUMA suggested merging the “Federal PA Obligation Funds,” “Nonfederal Funds,” and “Operation Exp” columns in all tables into one column. Lastly, LUMA anticipated it would be unable to input information into the “Low Voltage Distribution Lines” table because it does not track mileage for low voltage lines. The August 21st Motion is pending the consideration of the Energy Bureau.

8. On November 14, 2024, LUMA submitted *Motion Submitting Vegetation Management Progress Report for the First Quarter of Fiscal Year 2025*, whereby it submitted the Vegetation Management Report corresponding to Q1 of Fiscal Year 2025 (“November 14th Motion”). Therein, LUMA indicated that the Q1 Fiscal Year 2025 Vegetation Progress Report included substantially all the data requested based on the four templates provided by the Energy Bureau. It requested until the next quarter to update all tables’ “Urban/Rural Site” columns.

9. In compliance with the August 8th Order, LUMA hereby submits its Q3 Vegetation Progress Report for Fiscal Year 2025. *See Exhibit 1* to this Motion.

10. LUMA respectfully restates its request to the Energy Bureau to issue guidance on the matters raised for clarification in the August 21st Motion.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the Q3 VM Progress Report submitted as *Exhibit 1* to this Motion; **reiterate** its request to clarify certain portions of the template VM Progress Report as discussed above; and **deem** that LUMA complied with the August 8th Order regarding reporting on vegetation progress for Q3 Fiscal Year 2025.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to counsels for PREPA, Mirelis Valle-Cancel, mvalle@gmlex.net, and Alexis G. Rivera Medina, arivera@gmlex.net.

In San Juan, Puerto Rico, this 15th day of May, 2025.



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Exhibit 1

Vegetation Management Progress Report for the Third Quarter of FY2025
[Excel Spreadsheet submitted Via Email]