

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

NEPR

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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Submittal of June 2025 Report on
the Development of the Pilot Emergency Backup
Generators Demand Response Program

**MOTION TO SUBMIT JUNE 2025 REPORT ON THE DEVELOPMENT OF THE
PILOT EMERGENCY BACKUP GENERATORS DEMAND RESPONSE PROGRAM**

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:

I. Introduction

As the transmission and distribution system operator, LUMA is responsible for facilitating the implementation of Puerto Rico’s public energy policy, including key customer initiatives such as Energy Efficiency (“EE”) and Demand Response Programs (“DR”), which are required by law and mandated by the Puerto Rico Energy Bureau (“Energy Bureau”). Accordingly, LUMA has been implementing a Transition Period Plan (“TPP”) containing various quick-start or pilot EE and DR programs, which will be setting the stage for the design and implementation of larger scale, more permanent programs.

In compliance with a Resolution and Order of October 23, 2024, since January 15, 2025, LUMA has been submitting monthly reports on the development of a pilot Emergency Backup Generator Demand Response Program (now referred to as the “Emergency Load Reduction

Program”) which the Energy Bureau directed be in place for summer of 2025. As directed by Resolution and Order of April 30, 2025, LUMA submitted to the Energy Bureau, on May 21, 2025, its proposal for the Emergency Load Reduction Program which is currently pending before the Energy Bureau.

LUMA is now submitting, as *Exhibit 1* to this Motion, the report for June 2025 on the status of this pilot program.

II. Relevant Background and Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Order”) in which, among other determinations, it ordered LUMA to submit a program for the use of backup generators as a Demand Resource in emergency situations before the summer of 2025 (that is, the Emergency Load Reduction Program) and file monthly reports on the 15th of each month, beginning on January 15, 2025, detailing LUMA’s efforts to design and implement the program. *See* October 23rd Order, pp. 4-5.

2. On January 15, 2025, February 15, 2025, March 17, 2025, LUMA submitted monthly reports on the development of the Emergency Load Reduction Program. *See Motion to Submit January 2025 Report on the Development of the Backup Generators Emergency Demand Response Program; Motion to Submit February 2025 Report on the Development of the Backup Generators Emergency Demand Response Program; and Motion to Submit March 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.*

3. On April 3, 2025, the Energy Bureau issued a Resolution and Order scheduling a Technical Conference for April 24, 2025 to discuss, among others the status of the Emergency Load Reduction Program.

4. On April 15, 2025, submitted a monthly report on the development of the Emergency Load Reduction Program. *See Motion to Submit April 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.*

5. On April 24, 2025, the Energy Bureau held a Technical Conference, in which LUMA provided a presentation on the Emergency Load Reduction Program, among others.

6. On April 30, 2025, the Energy Bureau issued a Resolution and Order ordering LUMA to file, among others, the proposal for the Emergency Load Reduction Program (“April 30th Order”).

7. On May 14, 2025, LUMA submitted a monthly report on the development of the Emergency Load Reduction Program. *See Motion to Submit May 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.*

8. On May 21, 2025, LUMA filed its proposal for the Emergency Load Reduction Program, in compliance with the April 30th Order. *See Motion to Submit Proposal for Emergency Load Reduction Program in Compliance with Resolution and Order of April 30, 2025.*

III. Submittal of Report on Emergency Load Reduction Program

9. In compliance with the October 23rd Order, LUMA submits with this Motion its report for June 2025 on the development of the Emergency Load Reduction Program. *See Exhibit I* (the “Report”). As noted in the report, customer enrollment is awaiting program approval and action by other agencies to facilitate customer participation.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the report included in *Exhibit I* in compliance with the October 23rd Order with respect to the submittal of monthly reports on the development of the Emergency Load Reduction Program.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of June 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 copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com, info@sesapr.org, bfrench@veic.org, evand@sunrun.com, jordgraham@tesla.com, forest@cleanenergy.org, customerservice@sunnova.com, javrua@sesapr.org, pjcleanenergy@gmail.com, cfl@mcvpr.com; mqs@mcvpr.com; and mrios@arroyorioslaw.com.



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Exhibit 1

June 2025 Report on Emergency Backup Generator Demand Response Program



Demand Response: Backup Generator Demand Response Pilot Monthly Report

NEPR-MI-2022-0001

June 13, 2025

Backup Generator Demand Response Pilot Monthly Report

B On target **Y** Caution **O** Off plan **G** Complete

Key Activity Summary	
<ul style="list-style-type: none">LUMA has been in periodic communication with the Puerto Rico Energy Bureau (PREB), the United States Environmental Protection Agency (EPA), and the Puerto Rico Department of Natural and Environmental Resources (DRNA) to support the necessary agency actions and facilitate customer participation in the Emergency Load Reduction Program (ELRP), allowing eligible customers to use their backup generators during Emergency DR Events.<ul style="list-style-type: none">On May 9 - LUMA sent a copy of the Request to EPA for No Action Assurance to DRNA for their awareness.On May 13 - LUMA had a meeting with EPA to discuss their comments about LUMA's Request for Non-Action Assurance (NAA).On May 15 - LUMA participated in a meeting with Governor and EPA Regional Administrator to discuss LUMA's request for NAA, as well as other demand reduction initiatives.During the current reporting month, LUMA has held discussions with commercial and industrial customers interested in participating in the program. While no customer agreements have been signed yet, LUMA has begun collecting generator information from these potential participants to address the information requirements that may be established by EPA if they issue a determination addressing the air permitting limitations.On May 21, 2025, LUMA submitted to the PREB a formal proposal for the Emergency Load Reduction Program, along with a request for approval of this program. The PREB review process for this proposal remains ongoing.	
Risk / Issues:	
EPA has not yet addressed the air permitting limitations that constrain customers' ability to participate in the program.	

Key Milestones	Date	Status
Continued alignment with internal departments for the re-launch of the Backup Generator Demand Response pilot.	Ongoing	B
Refine and revise Backup Generator Demand Response pilot program terms and customer outreach materials as needed.	Ongoing	B
Work with stakeholders to discuss limitations of EPA regulations for Backup Generators.	3/21/2025	Y
Conduct outreach to target industrial customers to recruit and gather additional input.	Ongoing	B
Initial customer agreements signed and program ready for events.*	6/1/2025 – 6/30/2025	Y

*Subject to PREB approval of ELRP Proposal.





People First.
Safety Always.

