

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

**IN RE:**

LUMA'S ACCELERATED STORAGE  
ADDITION PROGRAM

**CASE NO. NEPR-MI-2024-0002****SUBJECT:** Compliance with Resolution and Order of June 25, 2025, and Request for Confidential Treatment

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF JUNE 25, 2025,  
AND REQUEST FOR CONFIDENTIAL TREATMENT**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy Servco, LLC** ("ServCo") (jointly referred to as "LUMA"), through the undersigned counsel, and respectfully states and requests the following:

**I. Relevant Procedural History and Background**

1. On June 16, 2025, the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("June 16<sup>th</sup> Order") requiring LUMA to submit an update on the Accelerated Storage Addition Program ("ASAP")<sup>1</sup>. Specifically, the Energy Bureau ordered LUMA to provide, within five (5) days from the notification of the June 16<sup>th</sup> Order,

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<sup>1</sup> ASAP is a program developed by LUMA and approved by the Puerto Rico Energy Bureau ("Energy Bureau") proposing the accelerated integration of Battery Energy Storage Systems ("BESS") to the Puerto Rico electrical system to be dispatched to provide time shift services, voltage and frequency support and other ancillary services resulting in improved system reliability, reduction of load shedding events and lower costs to customers. This program involves providing a standard offer ("SO") for adding BESS capacity at qualified independent power producer ("IPPs") facilities using two types of SO Agreements: the SO1 Agreement, offered to existing IPPs already operating and injecting energy into the grid, and the SO2 Agreement, offered to other IPPs with power purchase and operating agreements with the Puerto Rico Electric Power Authority ("PREPA") that are not yet operating and are in various stages of development.

“all **interconnection studies** conducted to date; a detailed report on the current status of any pending interconnection studies; a clear timeline for the completion of outstanding studies; and all available cost **information**, including detailed estimates, incurred costs, supporting documentation, associated with the interconnection process and a detailed status report of all the Phase 1 projects”. See June 16<sup>th</sup> Order, p. 2 (emphasis in the original).

2. On June 23, 2025, LUMA filed with the Energy Bureau a status update on the interconnection studies of the ASAP projects, ASAP interconnection process cost information, and status update of the SO1 projects, in compliance with the June 16<sup>th</sup> Order. See *Motion in Compliance with Resolution and Order of June 16, 2025 and Request for Confidential Treatment* (“June 23<sup>rd</sup> Motion”), Exhibits 1, 2 and 3. Exhibit 1 of the June 23<sup>rd</sup> Motion contained a report titled “ASAP Interconnection Studies and Costs Update” dated June 23, 2025. Exhibits 2 and 3 of the June 23<sup>rd</sup> Motion contained the relevant documents of Power Purchase Cost Adjustment (“PPCA”) factors filings conducted in Case No. NEPR-MI-2020-0001, *In re: Puerto Rico Electric Power Authority Permanent Rate* (“Permanent Rate Docket”) on March 17, 2025 and June 16, 2025<sup>2</sup>, providing the costs incurred and forecasted for ASAP implementation for purposes of recovery and reconciliation through the PPCA, along with detailed descriptions of incurred and forecasted costs.

3. On June 26, 2025, the Energy Bureau issued a Resolution and Order (“June 26<sup>th</sup> Order”) indicating that LUMA had provided in the June 23<sup>rd</sup> Motion a status update of the SO1 Agreements but “did not provide the status of the SO2 Agreements, including interconnection

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<sup>2</sup> Specifically, the *Motion Submitting FCA and PPCA Reconciliations for December 2024 through February 2025, Submission of FCA, PPCA and FOS Calculated Factors, and Request for Confidential Treatment* filed on March 17, 2025 and pertinent Exhibit 1 and the *Motion Submitting FCA and PPCA Reconciliations for March through May 2025 and Updated Annual Reconciliation and Submission of FCA, PPCA and FOS Annual Calculated Factors and Request for Confidential Treatment* filed on June 16, 2025 and pertinent Exhibit 1.

studies and cost information”. See June 26<sup>th</sup> Order, p. 1. The Energy Bureau then ordered LUMA to within five (5) business days, provide “all interconnection studies conducted to date; a detailed report on the current status of any pending interconnection studies; a clear timeline for the completion of outstanding studies; and all available cost information, including detailed estimates, incurred costs, supporting documentation, associated with the interconnection process”. *Id.*

## **II. Submittal of Information in Compliance with June 26<sup>th</sup> Order**

4. In compliance with the June 26<sup>th</sup> Order, LUMA is providing herein additional details on the status of the interconnection studies, the timeline for completing these studies and available cost information associated with the interconnection process of the SO2 Agreements. See *Exhibits 1* and *2*. These Exhibits supplement the status update provided in Exhibit 1 of the June 23<sup>rd</sup> Motion.

## **III. Request for Confidentiality**

5. LUMA respectfully requests the honorable Energy Bureau to maintain *Exhibit 2* herein confidential as containing validated trade secret information under applicable laws and regulations, including the Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended on September 21, 2016 (“Policy on Confidential Information”). LUMA will be submitting, within the next ten (10) days, a Memorandum of Law in support of this request for confidential treatment, in compliance with the Policy on Confidential Information.

**WHEREFORE**, LUMA respectfully requests that this Energy Bureau **take notice** of the aforementioned; and **accept** this motion and *Exhibits 1* and *2* in compliance with the June 25<sup>th</sup> Order; and **grant** LUMA’s request for confidential treatment of *Exhibit 2*, noting that LUMA will be submitting a Memorandum of Law in support of this request within the next ten (10) days.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 2<sup>nd</sup> day of July 2025.

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau and we will send a courtesy copy of this motion to hriviera@jrsp.pr.gov; arivera@gmlex.com; oramos@pmalaw.com; and agraitfe@agraitlawpr.com.



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## Exhibit 1

# Standard Offer Phase 2 Interconnection Studies and Cost Information

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Exhibit 1





## Executive Summary

In compliance with the Puerto Rico Energy Bureau's Resolution and Order of June 25, 2025, LUMA is providing in this document additional information regarding the status of the Standard Offer 2 (SO2) projects of the Accelerated Storage Addition Program (ASAP). This document supplements the ASAP Interconnection Studies and Costs Update submitted to the Energy Bureau on June 23, 2025, as Exhibit 1 to the Motion in Compliance with Resolution and Order of June 16, 2025, and Request for Confidential Treatment (June 23rd Response) filed by LUMA in Case NEPR-MI-2024-0002.

As will be described below, LUMA focused much of its June 23rd Response on discussing SO1 project status, since that is where the vast majority of LUMA's efforts have been focused since the January 14, 2025, Energy Bureau order approving the last of the first four SO1 contracts. While the status of SO2 projects was included in the June 23rd Response, we are providing herein further details and clarification.

LUMA has organized this response into two major sections which are listed below and explained in the following paragraphs:

1. SO2 Project Status
2. Compliance with the June 25<sup>th</sup> Order

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## 1.0 SO2 Project Status

LUMA continues to pursue the steps and the sequence described in the ASAP Program Implementation Plan submitted to the Energy Bureau on February 28, 2025<sup>1</sup> and approved by the Energy Bureau by Resolution and Order issued on March 5, 2025. When it prepared this plan and associated timeline, LUMA anticipated that the site visits and system studies, as well as discussions with the six SO1 development projects that had indicated their interest in the ASAP Standard Offer, would be completed before initiating the site assessments relating to the SO2 interested participants and associated system studies. Exhibit 3 of the February 28, 2025, motion provides SO1 and SO2 indicative timelines. Showing SO2 site visits happening one month after SO1.

This ASAP Implementation Program Plan was based on the principle that the SO1 development projects were already operating with existing points of interconnection (POIs) and were more knowledgeable about the details of the ASAP BESS deployment issues since they have been engaged with detailed discussions with LUMA over the previous year. As LUMA informed in the past, there were several elements of the ASAP SO Program that needed to be completed before expanding the SO Agreements to the other interested SO2 parties. Many, but not all, of those items have been resolved as a result of detailed discussions with the SO1 participants. The resolution of these elements will be useful in proceeding with the SO2 projects. As a result, most of LUMA June 23<sup>rd</sup> Response discussed SO1 status with only references to SO2 interconnection project status.

With the above context in mind, it is clarified that there have been no interconnection studies started or completed for SO2 projects as of this date. There have been several meetings and discussions with SO2 developers who have expressed significant interest in ASAP.

## 2.0 Compliance June 25<sup>th</sup> Order

In its June 25<sup>th</sup> Order, the Energy Bureau ordered LUMA to provide several specific items or answers to questions. These are addressed here to make sure this filing is responsive to the requested information.

As of now, no interconnection studies have been completed for either the SO1 or SO2 projects.

Regarding the current status of pending interconnection studies, Requests for Information (RFIs) are currently being exchanged between the SO1 project participants and the engineering firm, which is a necessary step before the actual studies can begin. However, the studies themselves have not yet commenced. For the SO2 projects, the RFI exchange process has not yet started. Notably, the SO1 contract project schedules are not expected to be impacted by the timing of the SO1 interconnection studies.

A timeline for the completion of the outstanding interconnection studies has been established: the SO1 studies are expected to be completed three months following the initial site assessment, which points to a projected completion in September 2025. For the SO2 studies, the same three-month completion timeframe will apply following the site assessments; however, these have not yet been scheduled. Based

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<sup>1</sup> See Motion to Submit Program Implementation Plan and Associated Documents, Request for Approval of ASAP Cost Recovery Mechanism, and Request for Confidential Treatment filed on February 28, 2025, in Case No. NEPR-MI-2024-0002.

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on current expectations, the SO2 studies would be completed around late October. A more specific schedule for the SO2 studies will be developed and submitted to the Energy Bureau once the SO1 studies are completed.

In terms of costs associated with the interconnection process, LUMA has provided a copy of engineering firm Task Order as Exhibit 2. This document outlines all currently available details and estimates related to the cost of the interconnection studies and related support activities. The costs forecasted and incurred to date for ASAP program are being reported under docket NEPR-MI-2020-0001 and are inclusive of both SO1 and SO2.

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## Appendix A: SO2 Participants' Details

Projects participating in ASAP SO2 will remain anonymous until further notice.

#	Task	SO2-01	SO2-02	SO2-03	SO2-04	SO2-05	SO2-06	SO2-07	SO2-08	SO2-09	SO2-10	SO2-11	SO2-12	SO2-13
<b>1</b>	<b>Preliminary Assessment</b>													
1.1	Receive Expression of Interest	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed
1.2	Receive Preliminary Project Details	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed
1.3	Receive Preliminary Agreement	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
<b>2</b>	<b>Standard Offer (SO) Agreement Status</b>													
2.1	Receive Developer's Information for SO	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.2	Submit Draft SO to Energy Bureau	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.3	Submit Finalized SO to Energy Bureau	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.4	Approval of SO by Energy Bureau	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.5	Approval of SO by PREPA	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.6	Approval of SO by FOMB	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.7	Approval of SO by P3A	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
2.8	Execution of SO	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
<b>3</b>	<b>Site Visits and Engineering Studies</b>													
3.1	Site Visits (Part I)	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
3.2	Memo of Findings	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
3.3	Participants to answer RFIs prior to Site Visits Part II	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
3.4	Site Visits (Part II)	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
3.5	Completion of RFIs	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started

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3.6	System Impact and Feasibility Studies	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
<b>4</b>	<b>Agreed Operation Procedures (AOP)</b>													
4.1	AOP Prelim. Draft v1 sent to SO2 Developers for feedback	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
4.2	AOP Workshops completed	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
4.3	AOP Prelim. Draft v2 to SO2 Developers for redlines	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
4.4	AOP Legal Review	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
4.5	Finalize AOP Draft v2.0	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
4.6	Execution of AOP v2.0	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
<b>5</b>	<b>Position Papers</b>													
5.1	Insurance Position Paper Draft sent to Developers	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed	Completed
5.2	Insurance Position Paper Developer Feedback Received	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.3	Insurance Position Paper Execution	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.4	Tariffs Position Paper Draft sent to Developers	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.5	Tariffs Position Paper Developer Feedback Received	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.6	Tariffs Position Paper Execution	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.7	Expanded Capacity Position Paper Draft sent to Developers	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.8	Expanded Capacity Position Paper Developer Feedback Received	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
5.9	Expanded Capacity Position Paper Execution	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
<b>6</b>	<b>Large Generation Interconnection Agreement (LGIA)</b>													
6.1	Prepare Preliminary Draft	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
6.2	LUMA and Legal Review	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
6.3	Collect feedback from Developers	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started

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6.4	Finalize LGIA Draft	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
6.5	Execution of LGIA	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
7	<b>Initiate Developer Engineering, Procurement and Construction (EPC)</b>													
8	<b>Commercial Operation Date (COD)</b>													

Exhibit 2

*[Submitted under Seal of Confidentiality]*