

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

NEPR

Received:

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IN RE: LUMA’S ACCELERATED STORAGE CASE NO. NEPR-MI-2024-0002
ADDITION PROGRAM

**SUBJECT: Urgent Request for Extension of Time to
Comply with the July 9, 2025, Order to Show Cause**

**URGENT REQUEST FOR EXTENSION OF TIME TO COMPLY WITH THE JULY 9,
2025, ORDER TO SHOW CAUSE**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy Servco, LLC** (“ServCo”) (jointly referred to as the “Operator” or “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On July 9, 2025, the Puerto Rico Energy Bureau (“Energy Bureau”) issued an Order to Show Cause (“July 9th Order”) in connection with a *Motion in Compliance with Resolution and Order of June 25, 2025, and Request for Confidential Treatment* (“July 2nd Motion”) filed by LUMA on July 2, 2025, in which LUMA provided information on the status of the interconnection studies and available cost information for the interconnection process of the Accelerated Storage Addition Program (“ASAP”) SO2 projects, and submitted a Task Order reflecting the estimated costs for the interconnection studies. The Energy Bureau argued that the costs associated with SO1 projects were “neither disclosed nor justified” by LUMA during the ASAP approval process; that the Task Order, reflecting an estimated cost of \$1.3MM for SO1 interconnection studies, “directly contradicted” LUMA’s prior representation that no upgrades on interconnection costs were required for SO1; and that LUMA had “strayed from the approved ASAP”. See July 9th Order, p. 3.

2. The Energy Bureau also argued that LUMA's "failure to comply with and abide by the Energy Bureau's orders and/or directives constitute[d] non-compliance and warrant[ed] the imposition of fines, under Section 6.36 of Act 57-2014." *See id.* The Energy Bureau then ordered LUMA to Show Cause, within five (5) days of the July 9th Order, as to why the Energy Bureau should not: 1) impose an administrative fine of one hundred thousand dollars (\$100,000) for "willful non-compliance and/or misrepresentation of material facts and deviation from the Energy Bureau's directives"; and 2) disallow the mentioned costs of the interconnection studies based on "inaccurate or misleading information" submitted to the Energy Bureau. *See id.* The Energy Bureau further directed that LUMA explain in detail the reasons for this alleged "misrepresentation and disregard of" the Energy Bureau's directives and provide justification for the Energy Bureau to consider regarding the imposition of fines, noting that failure to respond to the July 9th Order would result in the immediate imposition of fines, and a continuing fine of up to twenty-five thousand dollars (\$25,000) per day until full compliance is achieved. *See id.*

3. The Energy Bureau's characterizations of LUMA's submittals and actions in this proceeding set forth in the July 9th Order are of a severe nature. LUMA takes these types of allegations very seriously and intends to provide an in-depth, detailed response to these allegations which will demonstrate that the record does not sustain the findings made by this Honorable Energy Bureau. This is of utmost importance to ensure the clarity and accuracy of the record in this proceeding and for LUMA to be able to vigorously and appropriately defend itself from these allegations. However, given the nature of the allegations and type of response that is required, LUMA respectfully submits the timeframe provided is insufficient for LUMA to adequately respond. Accordingly, LUMA hereby respectfully requests from this Honorable Energy Bureau a brief extension of time of five (5) business days to submit its full response to the July 9th Order.

4. It is respectfully informed that this request for extension is made in good faith and is not intended to cause unnecessary delay.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the above; **grant** this Urgent Request for Extension of Time to Comply with the July 9, 2025, Order to Show Cause; and accordingly **grant** LUMA five (5) additional business days to respond to the Energy Bureau's July 9th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th 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 hrivera@jrsp.pr.gov; arivera@gmlex.com; oramos@pmalaw.com; and agraitfe@agraitlawpr.com.



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