

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

**NEPR**

**Received:**

**Jul 21, 2025**

**5:03 PM**

**IN RE:** PUERTO RICO ELECTRIC POWER  
AUTHORITY'S EMERGENCY RESPONSE  
PLANS

**CASE NO.:** NEPR-MI-2019-0006

**SUBJECT:** APPA mutual aid benefits

**JOINT MOTION IN COMPLIANCE WITH THE JUNE 20, 2025-RESOLUTION AND ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

**COMES NOW** the Puerto Rico Electric Power Authority ("PREPA") through its undersigned counsel, and LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA"), through the undersigned counsel, respectfully respond and submit as follows:

1. On June 20, 2025, the Energy Bureau issued a Resolution and Order ("June 20-Resolution") ordering PREPA to submit, within ten (10) days of the notification of this Resolution and Order: a single coordinated LUMA response addressing the questions of: (i) whether LUMA prefers that PREPA request mutual aid on its behalf or prefers to do so directly and (ii) an explanation of which process is the most efficient to expeditiously obtain mutual aid in an emergency.

2. On June 30, 2025, PREPA filed a *Motion in Partial Compliance with June 20<sup>th</sup>, 2025-Resolution and Order and Request for an Extension of Time*

requesting, among other things, a twenty (20) day extension to comply with its June 20-Resolution, which expires today, July 21, 2025.

3. On July 18, 2025, to comply with the June 20-Resolution, the undersigned counsel from PREPA had a meeting with LUMA to discuss LUMA's position regarding the *American Public Power Association* ("APPA"), which LUMA had communicated to PREPA via email to PREPA's counsel on July 10, 2025.

4. Therefore, in compliance with the June 20-Resolution, PREPA and LUMA state that it is LUMA's position to continue leveraging the APPA through PREPA for both mutual aid and the procurement of difficult-to-obtain materials and equipment.

5. This is due to PREPA's long-standing relationship with APPA, which enables expedited requests for volunteer resources. Even though LUMA understands that using PREPA's APPA agreement does not diminish LUMA's responsibilities for mutual aid, it understands that this collaborative approach has demonstrated its effectiveness in past events. For example, during Tropical Storm Ernesto, PREPA immediately reached out to LUMA during the pre-event stage to participate in the APPA meetings in preparation for a potential mutual aid request. Most recently, as part of a Department of Energy ("DOE") initiative, PREPA partnered with LUMA to facilitate the inclusion of APPA in a request for difficult-to-procure materials and equipment.

6. Therefore, LUMA prefers that PREPA remain the APPA member of record because PREPA's established relationship allows for expedited access to

request mutual aid resources during emergencies and facilitates participation in federal initiatives. This arrangement preserves continuity, avoids duplicative efforts, and has already demonstrated its effectiveness through joint actions in recent events. By maintaining PREPA's membership, both entities can maximize coordination and responsiveness without undermining LUMA's or PREPA's responsibilities under the T&D OMA.

7. As to which process is the most efficient to expeditiously request external resources in an emergency, LUMA states that the most efficient process is through pre-positioned contracts. These contracts are LUMA's first option, followed by LUMA's mutual aid agreement with the Edison Electric Institute ("EEI") and, as a third option, PREPA's mutual aid with APPA. Pre-positioned contracts are highly efficient because they do not rely on requesting volunteers; instead, they feature well-defined Statements of Work with specific resources pre-identified to augment LUMA's organic capabilities for Type 1, 2, or 3 Events as defined in LUMA's Emergency Response Plan ("ERP").

**WHEREFORE**, PREPA and LUMA respectfully request the Energy Bureau to take notice of the foregoing and, therefore, determine both entities complied with its June 20-Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 21<sup>st</sup> day of July 2025.

**CERTIFICATE OF SERVICE:** We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at

<https://radicacion.energia.pr.gov/login>, and that  
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