

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

IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: Hearing Examiner's Order
Requiring Attestation Addressing PREPA's
Billing System

**Hearing Examiner's Order Requiring Attestation
Addressing PREPA's Billing System**

In our conference on July 24, 2025, Jessica Laird, LUMA's Senior Vice President, Customer Service, addressed the ways in which LUMA could feasibly bill customers for the provisional rate, and do so by September 1, 2025. She explained that to recover the portion of the provisional rate represented by the increment above the current rate, LUMA has created computer code and taken other steps that make two riders available. She added that in constructing those riders, LUMA relied on prior Energy Bureau statements allowing LUMA to use in each rider an equal cents/kWh charge for all customer categories.

At the July 24 conference, PREB consultants and I asked Ms. Laird about the feasibility of altering one of those riders to accommodate fixed charges rather than an equal cents/kWh charge, where the fixed charge would differ among the customer categories. Ms. Laird's response, as I understood it, was that unusual features of PREPA's billing system, including some 4800 components that lacked any counterpart in customary billing systems, made that alteration by September 1 infeasible—that infeasibility arising from time, cost, and risk. She added that with money and time, such as the time between now and when the Energy Bureau issues its final order on permanent rates, the alteration would be feasible.

I would like Ms. Laird to support her July 24 statements with an attestation, submitted officially to the Energy Bureau and copied to all parties as soon as possible. The attestation should contain as much detail as is available to her, should be based on facts and professional experience, and should cover the following topics:

- the specific characteristics of PREPA's current billing system that would require change or replacement;

- the technical steps necessary to achieve the change or replacement;
- the time and cost associated with those steps; and
- the specific risks—including events and consequences—that would accompany an attempt to achieve the change or replacement by September 1.

I recognize that LUMA is still responding to discovery requests, but I ask that it make this provisional-rate matter an immediate priority.

Be notified and published.



Scott Hempling
Hearing Examiner

CERTIFICATION

I certify that the Hearing Examiner, Scott Hempling, has so established on July 29, 2025. I also certify that on July 29, 2025, a copy of this Order was notified by electronic mail to mvalle@gmlex.net; arivera@gmlex.net; jmartinez@gmlex.net; jgonzalez@gmlex.net; katiuska.bolanos-lugo@us.dlapiper.com; Yahaira.delarosa@us.dlapiper.com; margarita.mercado@us.dlapiper.com; carolyn.clarkin@us.dlapiper.com; andrea.chambers@us.dlapiper.com; sromero@sbgblaw.com; gcastro@sbgbllaw.com; jfr@sbgbllaw.com; regulatory@genera-pr.com; legal@genera-pr.com; hriviera@jrsp.pr.gov; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com; Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidehouse.com; Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; kara.smith@weil.com; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; lgnq2021@gmail.com; jan.albinolopez@us.dlapiper.com; Rachel.Albanese@us.dlapiper.com; varoon.sachdev@whitecase.com; jdiaz@sbgbllaw.com; javrua@sesapr.org; Brett.ingerman@us.dlapiper.com; agraitfe@agraitlawpr.com; jpouroman@outlook.com; epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; Robert.berezin@weil.com; Gabriel.morgan@weil.com; corey.bradley@weil.com; lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; isaac.glassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; hburgos@cabprlaw.com; dperez@cabprlaw.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com;

bill.natbony@cwt.com; thomas.curtin@cwt.com; escalera@reichardescalera.com;
riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com;
erickay@quinnemanuel.com; dmonserrate@msglawpr.com; fgierbolini@msglawpr.com;
rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com;
David.herman@dechert.com; Julia@londoneconomics.com; Brian@londoneconomics.com;
luke@londoneconomics.com; juan@londoneconomics.com; mmcgrill@gibsondunn.com;
LShelfer@gibsondunn.com; jnieves@cstlawpr.com; arrivera@nuenergypr.com;
apc@mcvpr.com. I also certify that on July 29, 2025, I have proceeded with the filing of the Order
issued by the Puerto Rico Energy Bureau.

I sign this in San Juan, Puerto Rico, on July 29, 2025.


Sonia Seda Gaztambide
Clerk

