

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

NEPR

Received:

Aug 12, 2025

1:51 PM

IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: Motion to Inform Filing in
Related Docket

**MOTION TO INFORM FILING IN RELATED DOCKET REQUESTING
APPROVAL OF AMENDED MODEL BILL**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU AND ITS HEARING

EXAMINER, SCOTT HEMPLING:

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”), and respectfully state and inform as follows:

1. On August 12, 2025, LUMA filed a motion in Case No. NEPR-MI-2021-0008, titled *Request for Approval of Revisions to LUMA Model Bill to Incorporate Provisional Riders Approved on July 31, 2025* (the “Model Bill Revision Motion”). See Exhibit 1.

2. The Model Bill Revision Motion seeks Energy Bureau approval to revise the currently operative Model Bill to incorporate the two provisional rate riders approved by the Energy Bureau in its *Resolution and Order* of July 31, 2025 (“July 31 Provisional Rate Order”), issued in the instant docket, namely:

Table 1-1	
2025 Provisional Rate	To collect the “Costs other than pension costs” approved in the July 31 Provisional Rate Order, Sec. VI (S), p. 36.
Tarifa Provisional 2025	
Provisional-Rate Pension Rider	To collect the “Pension Costs” approved in the July 31 Provisional Rate Order, Sec. VI (T), p. 37.
Tarifa Provisional Para Pensión	

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3. The proposed revisions are necessary to ensure compliance with the Energy Bureau's directive to begin collecting the approved provisional rates by September 1, 2025, and to maintain consistency between the approved rate structure and the customer-facing billing format.

4. LUMA submits this motion for the purpose of ensuring that the Energy Bureau and all interested parties in this docket are aware of the filing made in the Model Bill docket, and to facilitate coordinated review and implementation of the provisional rate riders.

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the filing made in Case No. NEPR-MI-2021-0008 attached hereto as Exhibit 1 and consider the same in connection with the implementation of the provisional rates approved on July 31, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of August, 2025.



DLA Piper (Puerto Rico) LLC
Calle de la Tanca #500, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9122
Fax 939-697-6092

/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA 16,266
margarita.mercado@us.dlapiper.com

/s/ Jan M. Albino López
Jan M. Albino López
RUA 22,891
jan.albinolopez@us.dlapiper.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to Hearing Examiner, Scott Hempling, shempling@scotthemplinglaw.com; and to the attorneys of the parties of record. To wit, to the **Puerto Rico Electric Power Authority**, through: Mirelis Valle-Cancel, mvalle@gmlex.net; Juan González, jgonzalez@gmlex.net; Alexis G. Rivera Medina, arivera@gmlex.net; Juan Martínez, jmartinez@gmlex.net; and Natalia Zayas Godoy, nzayas@gmlex.net; and to **Genera PR, LLC**, through: Jorge Fernández-Reboredo, jfr@sbgbllaw.com; Gabriela Castrodad, gcastrodad@sbgbllaw.com; Jennise Alvarez, jennalvarez@sbgbllaw.com; regulatory@genera-pr.com; José J. Díaz Alonso, jdiaz@sbgbllaw.com; and legal@genera-pr.com; **Co-counsel for Oficina Independiente de Protección al Consumidor**, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; **Co-counsel for Instituto de Competitividad y Sustentabilidad Económica**, jpouroman@outlook.com; agraitfe@agraitlawpr.com; **Co-counsel** for National Public Finance Guarantee Corporation, epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; robert.berezin@weil.com; Gabriel.morgan@weil.com; Corey.Brady@weil.com; **Co-counsel for GoldenTree Asset Management LP**, lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; iglassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; **Co-counsel for Assured Guaranty, Inc.**, hburgos@cabprlaw.com; dperez@cabprlaw.com; mmcgill@gibsondunn.com; lshelfer@gibsondunn.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; **Co-counsel for Syncora Guarantee, Inc.**, escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; **Co-Counsel for the PREPA Ad Hoc Group**, dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; david.herman@dechert.com; michael.doluisio@dechert.com; stuart.steinberg@dechert.com; **Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica**, nancy@emmanuelli.law; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; **Official Committee of Unsecured Creditors of PREPA**, jcasillas@cstlawpr.com; jnieves@cstlawpr.com; **Solar and Energy Storage Association of Puerto Rico**, Cfl@mcvpr.com; apc@mcvpr.com; javrua@sesapr.org; mrios@arroyorioslaw.com; ccordero@arroyorioslaw.com; **Wal-Mart Puerto Rico, Inc.**, Cfl@mcvpr.com; apc@mcvpr.com; Mr. Victor González, victorluisgonzalez@yahoo.com; and the **Energy Bureau's Consultants**, Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; jorge@maxetaenergy.com; rafael@maxetaenergy.com; RSmithLA@aol.com; msdady@gmail.com; mcranston29@gmail.com; dawn.bisdorf@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; guy@maxetaenergy.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com; carl.pechman@keylogic.com; bernard.neenan@keylogic.com; tara.hamilton@ethree.com; aryeh.goldparker@ethree.com; roger@maxetaenergy.com; and Shadi@acciongroup.com.

/s/ Jan M. Albino López
Jan M. Albino López

Exhibit 1

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

NEPR

Received:

Aug 12, 2025

12:48 PM

IN RE: REVIEW OF LUMA’S MODEL
BILL

CASE NO.: NEPR-MI-2021-0008

SUBJECT: Amendment of Model Bill to
Implement Provisional Rate Riders Approved
on July 31, 2025

**REQUEST FOR APPROVAL OF REVISIONS TO LUMA MODEL BILL TO
INCORPORATE PROVISIONAL RIDERS APPROVED ON JULY 31, 2025**

TO THE HONORABLE ENERGY BUREAU:

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”), and respectfully state and inform as follows:

I. INTRODUCTION

1. Pursuant to the Puerto Rico Energy Bureau’s (“Energy Bureau”) directives in the case of caption and consistent with the statutory and regulatory framework governing customer billing transparency, LUMA respectfully submits this request for approval of revisions to the currently operative Model Bill. The proposed revisions are necessary to incorporate two provisional rate riders approved by the Energy Bureau in its Resolution and Order of July 31, 2025, issued in Case No. NEPR-AP-2023-0003. These revisions are required to ensure compliance with the Energy Bureau’s order to begin collecting the approved provisional rates by September 1, 2025, and to maintain the integrity, transparency, and regulatory consistency of the Model Bill as the primary customer-facing instrument for rate communication.

II. PROCEDURAL BACKGROUND

2. On November 16, 2021, the Energy Bureau issued its Resolution and Order titled *Determinación sobre Factura Modelo de LUMA* in the proceeding *In Re: Review of LUMA*

Model Bill, Case No. NEPR-MI-2021-0008 (the “Model Bill Order”), approving LUMA’s bilingual Model Bill. The Energy Bureau determined that the proposed format satisfied the transparency requirements set forth in Act 83-1941, Act 57-2014, Act 17-2019, and Regulation 8863.

3. The Model Bill Order requires that any modification to the approved bill format be submitted to the Energy Bureau for prior evaluation and authorization. Accordingly, LUMA has periodically sought and obtained Energy Bureau approval to revise the Model Bill to implement subsequent regulatory directives. *See i.e., Resolution and Order*, June 28, 2024, Case No. NEPR-MI-2021-0008 (incorporating EV-TOU rate design).

4. On July 3, 2025, LUMA submitted a *Motion Submitting Rate Review Petition* in Case No. NEPR-AP-2023-0003, *In Re: Puerto Rico Electric Power Authority Rate Review* (“Rate Review Docket”), through which LUMA, Genera PR LLC, and the Puerto Rico Energy Bureau (“PREPA”) requested approval of, *inter alia*, provisional rates for Fiscal Year 2026.

5. On July 31, 2025, the Energy Bureau issued a *Resolution and Order* in the Rate Review Docket titled *Establishment of Fiscal Year 2026 Provisional Rates and Fiscal Year 2026 Provisional Budget* (the “July 31 Provisional Rate Order”), approving two provisional rate riders: (i) a provisional rate to recover incremental costs for Fiscal Year 2026 (excluding pension costs), and (ii) a provisional rate to recover PREPA pension costs for Fiscal Year 2026.

6. These provisional rate riders are not currently reflected in the approved Model Bill. Accordingly, LUMA must amend the Model Bill to incorporate these riders and commence collection in compliance with applicable laws and regulations.

III. LEGAL STANDARD

7. The electricity bill issued to customers is the primary instrument for communicating the charges associated with electric service. Pursuant to Regulation No. 8863, bills must be drafted in plain language and include specific content to ensure transparency and consumer protection. Required elements include, inter alia, the billing date, due date, notice of the right to object, and contact information for the utility and the Energy Bureau. See Regulation No. 8863, § 3.02.

8. The legal framework governing bill content is established in Article 6.27 of Act No. 57-2014, which mandates that the Energy Bureau adopt regulations governing bill review and service suspension procedures. *See* P.R. Laws Ann. tit. 22, § 1054x (2024). Additionally, Section 6(i) of Act No. 83-1941, as amended, requires that electricity bills itemize all charges and credits, including fuel adjustments, transition charges, and base rate components. *See* P.R. Laws Ann. tit. 22, § 196(i) (2024). These provisions collectively define the minimum standards for bill transparency and regulatory compliance.

IV. REQUEST FOR LEAVE TO AMEND MODEL BILL

9. LUMA hereby requests leave to revise the operative Model Bill to incorporate the following two provisional rate riders, which must be implemented by September 1, 2025, pursuant to the July 31 Provisional Rate Order:

[continues in next page]

Table 1-1	
2025 Provisional Rate	To collect the “Costs other than pension costs” approved in the July 31 Provisional Rate Order, Sec. VI (S), p. 36.
Tarifa Provisional 2025	
Provisional-Rate Pension Rider	To collect the “Pension Costs” approved in the July 31 Provisional Rate Order, Sec. VI (T), p. 37.
Tarifa Provisional Para Pensión	

10. Exhibit 1 hereto contains the proposed amendment to the Model Bill in both English and Spanish, illustrating the inclusion of the riders listed in the preceding paragraph, the applicable tariff, and an example of the charge for a customer per its consumption. These charges will be displayed in accordance with the Energy Bureau’s approved values for each rider, as established on the Rate Review docket *NEPR-AP-001-2003*. The new line items will appear under “Current Charges Details” > “Reconciliation Clauses and Riders” / “Detalle de los Cargos Corrientes” > “Cláusulas de Reconciliación,” preserving the structure and format previously approved by the Energy Bureau and employing the same nomenclature and positioning used for existing riders such as FCA – Fuel Cost Adjustment, PPCA – Purchased Power Cost Adjustment and CILT – Contribution in Lieu of Taxes. This approach ensures consistency and minimizes customer confusion, in alignment with the Bureau’s itemization standards.

11. Pursuant to the directives in the July 31 Provisional Rate Order, LUMA must begin collecting both provisional rates by September 1, 2025. Accordingly, LUMA respectfully requests that the Energy Bureau approve the revised section of the Model Bill submitted herein prior to that date.

12. LUMA is prepared to implement the amended Model Bill effective September 1, 2025, thereby ensuring timely and transparent disclosure of the new rate components.

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the foregoing, accept Exhibit 1 to this Petition, and approve and authorize LUMA to implement the revisions to the LUMA Model Bill described herein and in Exhibit 1.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of August, 2025.



DLA Piper (Puerto Rico) LLC
Calle de la Tanca #500, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9122
Fax 939-697-6092

Margarita Mercado Echegaray
RUA 16,266
margarita.mercado@us.dlapiper.com

/s Katuska Bolaños Lugo
Katuska Bolaños Lugo
RUA 18,888
Katuska.Bolanos-Lugo@us.dlapiper.com

I HEREBY CERTIFY that I filed this motion using the Energy Bureau's electronic filing system and that I will send an electronic copy of this motion to the Director of the Independent Consumer Protection Office, Hannia Rivera Díaz (hrivera@jrsp.pr.gov), and to the attorneys for PREPA, Mirelis del Valle (mvalle@gmlex.net) and Alexis Rivera (arivera@gmlex.net).

/s Katuska Bolaños Lugo
Katuska Bolaños Lugo

Exhibit 1

Revised Model Bill

On November 16, 2021, the Puerto Rico Energy Bureau (Energy Bureau or PREB) issued a Resolution and Order (November 16 R&O) approving LUMA's customer bill, known as the Model Bill.¹ The November 16 R&O further stipulated that any changes to the approved Model Bill must be submitted to the Energy Bureau for review and approval.²

In compliance with the November 16 R&O, LUMA is seeking PREB's approval to update its Model Bill to include the addition of the Provisional Rate and the Provisional Rate Pension Rider line items. The Provisional Rate and Provisional-Rate Pension Rider will appear as new line items under the "Reconciliation Clauses and Riders" column of the Current Charges Detail Section on page three of the Model Bill, as illustrated in Figure 1 highlighted in red.

The inclusion of these two (2) distinct items complies with the requirements set forth in the July 31, 2025, Provisional Rate Order (July 31st Order)¹ and aims to enhance LUMA's dedication to providing customers with a transparent and comprehensive billing statement.

Figure 1: Proposed Model Bill Current Charge Detail Section (English and Spanish)

CURRENT CHARGES DETAIL		
DESCRIPTION	TARIFF	CHARGE
Service Charges		
Customer Charge		\$4.00
Consumption Charge	500 kWh x \$0.04944	\$24.72
Sub-Total		\$28.72
Reconciliation Clauses and Riders		
Rider FCA- Fuel Charge Adj	500 kWh x \$0.102718	\$51.36
Rider PPCA-Purchased Power Charge Adj	500 kWh x \$0.047325	\$23.66
Rider CILTA-Municipalities Adj	500 kWh x \$0.004417	\$2.21
Rider SUBA-Subsidies, Public Light & Other Subv HH	500 kWh x \$0.012558	\$6.28
Rider SUBA-Subsidies, Public Light & Other Subv NHH	500 kWh x \$0.001091	\$0.55
Rider EE - Energy Efficiency Charge	500 kWh x \$0.000853	\$0.43
2025 Provisional Rate	500 kWh x \$0.014931	\$7.47
Provisional - Rate Pension Rider	500 kWh x \$0.019191	\$9.60
Sub-Total		\$101.56
Total		\$130.28

DETALLE DE LOS CARGOS CORRIENTES		
DESCRIPCIÓN	TARIFA	CARGO
Cargos por Servicio		
Cargo por Cliente		\$4.00
Cargo por Consumo	500 kWh x \$0.04944	\$24.72
Subtotal		\$28.72
Cláusulas de Reconciliación		
Cláusula FCA-Ajuste Cargo de Combustible	500 kWh x \$0.102718	\$51.36
Cláusula PPCA-Ajuste por Compra de Energía	500 kWh x \$0.047325	\$23.66
Cláusula CILTA-CELI (Municipios)	500 kWh x \$0.004417	\$2.21
Cláusula SUBA-Subsidios HH	500 kWh x \$0.012558	\$6.28
Cláusula SUBA-Subsidios NHH	500 kWh x \$0.001091	\$0.55
Cláusula EE-Cargo Eficiencia Energetica	500 kWh x \$0.000853	\$0.43
Tarifa Provisional 2025	500 kWh x \$0.014931	\$7.47
Tarifa Provisional Para Pension	500 kWh x \$0.019191	\$9.60
Subtotal		\$101.56
Total		\$130.28

¹ Resolution and Order of July 31, 2025, Docket No. NEPR-AP-2023-0003.