

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

NEPR

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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Submittal of August 2025 Report on
the Development of the Pilot Emergency Backup
Generators Demand Response Program

**MOTION TO SUBMIT AUGUST 2025 REPORT ON THE DEVELOPMENT OF THE
PILOT EMERGENCY BACKUP GENERATORS DEMAND RESPONSE PROGRAM**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

I. Introduction

Since January 15, 2025, LUMA has been submitting to the Puerto Rico Energy Bureau (“Energy Bureau”) monthly reports on the development of a pilot Emergency Backup Generator Demand Response Program (now referred to as the “Emergency Load Reduction Program”). This program aims to address the energy generation shortfall forecasted for the summer of 2025, through the deployment of emergency backup generators during defined emergency demand response events to prevent load shedding events that could result in impacts to a significant number of customers.

In addition, as directed by the Energy Bureau, LUMA submitted to the Energy Bureau, on May 21, 2025, its proposal for the Emergency Load Reduction Program, which was approved by

the Energy Bureau with certain conditions, while directing LUMA to continue providing monthly reports.

LUMA is now submitting, as *Exhibit 1* to this Motion, the report for August 2025 on the status of this pilot program.

II. Relevant Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Order”) in which, among other determinations, it ordered LUMA to submit a program for the use of backup generators as a demand resource in emergency situations before the summer of 2025 (that is, the Emergency Load Reduction Program) and file monthly reports on the 15th of each month, beginning on January 15, 2025, detailing LUMA’s efforts to design and implement the program.¹

2. On January 15, February 15, March 17, April 15, and May 14, 2025, LUMA filed with the Energy Bureau monthly reports on the development of the Emergency Load Reduction Program.² In these reports, LUMA informed on the progress of the development of the program, potential constraints to enrollment due to the restrictions on the air emissions permits of participants, and the potential that formal enrollment in the program would not occur without a waiver of these restrictions by the relevant agencies.³

¹ See October 23rd Order, pp. 4-5.

² See *Motion to Submit January 2025 Report on the Development of the Backup Generators Emergency Demand Response Program* (“January Motion”); *Motion to Submit February 2025 Report on the Development of the Backup Generators Emergency Demand Response Program* (“February Motion”); *Motion to Submit March 2025 Report on the Development of the Backup Generators Emergency Demand Response Program* (“March Motion”); *Motion to Submit April 2025 Report on the Development of the Backup Generators Emergency Demand Response Program* (“April Motion”); and *Motion to Submit May 2025 Report on the Development of the Backup Generators Emergency Demand Response Program* (“May Motion”).

³ See January Motion, Exhibit 1; February Motion, Exhibit 1; March Motion, Exhibit 1; April Motion, Exhibit 1; and May Motion, Exhibit 1.

3. On May 21, 2025, LUMA filed with the Energy Bureau its proposal for the Emergency Load Reduction Program.⁴

4. On June 13, 2025, LUMA filed with the Energy Bureau a monthly report on the development of the Emergency Load Reduction Program.⁵ LUMA noted in the report that customer enrollment was awaiting program approval and action by other agencies to facilitate customer participation.⁶

5. On June 20, 2025, the Energy Bureau issued a Resolution and Order (“June 20th Order”) in which it approved the Emergency Load Reduction Program through October 31, 2025, and directed LUMA to respond to certain requirements of information (“ROI”).⁷ In addition, given the uncertainties “around when and if LUMA will be able to enroll participants” and the number of months and events, the Energy Bureau did not yet approve a program budget; rather, the Energy Bureau directed LUMA to file a revised budget and timeline for program implementation “once LUMA finds a path to implement the ELRP” containing the information set forth in the June 20th Order and file the costs and justifications in the quarterly PPCA process once costs are incurred or the revised budget is approved.⁸ Furthermore, the Energy Bureau directed LUMA to continue filing the monthly reports on the status of the program.⁹

6. On July 11, 2025, LUMA submitted to the Energy Bureau the responses to the ROI. *See Motion to Submit Responses to Requirement of Information Regarding Emergency Load Reduction Program, in Compliance with Resolution and Order of June 20, 2025.*

⁴ *See Motion to Submit Proposal for Emergency Load Reduction Program in Compliance with Resolution and Order of April 30, 2025*

⁵ *See Motion to Submit June 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.*

⁶ *See id.*, Exhibit 1.

⁷ *See June 20th Order.*, p.3.

⁸ *See id.*

⁹ *See id.*

7. On July 15, 2025, LUMA filed with the Energy Bureau a monthly report on the development of the Emergency Load Reduction Program.¹⁰ LUMA noted that it continued to engage interested potential participants; however, regulatory action had not yet been taken to address the air permitting limitations that constrain customers' ability to participate in the program.¹¹

III. Submittal of Report on Emergency Load Reduction Program

8. In compliance with the October 23rd Order and June 20th Order, LUMA submits with this Motion its report for August 2025 on the status of the Emergency Load Reduction Program. *See Exhibit 1* (the "Report"). LUMA notes that it has continued its efforts with the relevant agencies to support the necessary agency actions to facilitate customer participation and has continued to work with stakeholders, among other actions described in the Report.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the Report included in *Exhibit 1* in compliance with the October 23rd Order and the June 20th Order with respect to the submittal of monthly reports on the development/status of the Emergency Load Reduction Program.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of August 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com; info@sesapr.org; bfrench@veic.org; evand@sunrun.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; [javrua@sesapr.org](mailto:javrva@sesapr.org); pjcleanenergy@gmail.com; cfl@mcvpr.com; mqs@mcvpr.com; and mrrios@arroyorioslaw.com.

¹⁰ See Motion to Submit July 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.

¹¹ See *id.*, p. 5.



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Exhibit 1

August 2025 Report on Emergency Backup Generator Demand Response Program



Demand Response: Emergency Load Reduction Program Monthly Report

NEPR-MI-2022-0001

August 15, 2025

Emergency Load Reduction Program Monthly Report

B On target **Y** Caution **O** Off plan **G** Complete

Key Activity Summary		Key Milestones	Date	Status
<ul style="list-style-type: none">LUMA continues its efforts to communicate with the United States Environmental Protection Agency (EPA), and the Puerto Rico Department of Natural and Environmental Resources (DRNA) to support the necessary agency actions and facilitate customer participation in the Emergency Load Reduction Program (ELRP), allowing eligible customers to use their backup generators during Emergency DR Events.During the current reporting month, LUMA held webinars with interested commercial and industrial customers. Four companies participated in the first webinar held on July 10, 2025, and seven companies participated in the second webinar held on July 15, 2025.As a follow up mechanism, a standard survey form was developed and shared with the webinar participants to collect feedback and learn about any concerns or issues that may prevent them from enrolling in the program.As of the filing of this report, one company has signed the ELRP Participation Agreement. Follow up meetings are being scheduled to continue the process for future participation.		Continued alignment with internal departments for the re-launch of the Backup Generator Demand Response pilot.	Ongoing	B
		Refine and revise Backup Generator Demand Response pilot program terms and customer outreach materials as needed.	Ongoing	B
		Work with stakeholders to discuss limitations of EPA regulations for Backup Generators.	Ongoing	B
		Conduct outreach to target industrial customers to recruit and gather additional input.	Ongoing	B
		Initial customer agreements signed and program ready for events.	Ongoing	Y
Risk / Issues:				
LUMA has successfully executed one agreement and continues to actively engage with additional potential participants. However, due to the evolving nature of the program and the current uncertainty regarding the number of participants who will ultimately enroll, a specific timeline nor budgetary details on implementation are available at this time.				





**People First.
Safety Always.**

