

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

NEPR

Received:

Aug 20, 2025

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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, 20205

**MOTION IN COMPLIANCE WITH ORDER ENTERED ON AUGUST 13, 2025
AND AMENDING MODEL BILL PROPOSAL**

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 Energy Bureau’s directives in its August 13, 2025 Resolution and Order (“August 13th Order”) and consistent with the statutory and regulatory framework governing customer billing transparency, LUMA submits this motion in compliance with said order.

2. This motion is accompanied by a revised version of Exhibit 1, which incorporates the nomenclature mandated by the Energy Bureau for the two provisional rate riders approved on July 31, 2025, in Case No. NEPR-AP-2023-0003.

II. PROCEDURAL BACKGROUND

3. On November 16, 2021, the Energy Bureau approved LUMA’s bilingual Model Bill and required that any future modifications be submitted for prior evaluation and approval.

4. On July 3, 2025, LUMA submitted a Rate Review Petition in Case No. NEPR-AP-2023-0003, requesting approval of provisional rates for Fiscal Year 2026.

5. On July 31, 2025, the Energy Bureau issued a *Resolution and 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. On August 12, 2025, LUMA submitted a request to amend the Model Bill to incorporate these riders, proposing the addition of two new line items. *See Request for Approval of Revisions to LUMA Model Bill to Incorporate Provisional Rate Riders Approved on July 31, 2025.*

7. On August 13, 2025, the Energy Bureau issued a *Resolution and Order* (“August 13th Order”) conditionally granting LUMA’s request. In doing so, the Bureau required the use of specific nomenclature (detailed below) that differs from the terminology proposed by LUMA in its August 12, 2025 submission. The Energy Bureau further ordered LUMA to file a revised version of the Model Bill reflecting the directives outlined in the August 13th Order no later than August 20, 2025. Upon the Bureau’s verification of compliance, LUMA will be authorized to implement the amended Model Bill and commence collection of the provisional rates, effective for all billing cycles beginning on or after September 1, 2025.

III. COMPLIANCE WITH AUGUST 13 ORDER

8. In compliance with the August 13th Order, LUMA has revised Exhibit 1 to incorporate the following nomenclature:

- a. Rider PROVISIONAL – Provisional Rate Adjustment (operations costs FY26)

Cláusula PROVISIONAL – Ajuste por tarifa provisional (costos operacionales AF26)

- b. Rider – PENSION PAYMENTS – Rate Adjustment (pension costs)

Cláusula PAGO DE PENSIONES – Ajuste por tarifa costos de pensión

9. The revised Exhibit 1 reflects these changes in both English and Spanish. *See* Exhibit 1.

10. It must be noted that incorporating the full language mandated by the Energy Bureau alters the structure of the Model Bill as previously approved. Specifically, it requires the addition of a second line to accommodate the detailed nomenclature ordered by the Bureau for each rider in both languages. Should the Energy Bureau determine that this modification does not align with its expectations for the Model Bill format, LUMA respectfully informs that its vendor has advised of the following character limitations for the bill printing system:

Type of content	Maximum number of characters
Only Font W	29 characters
Only Font A	41 characters
Mix Fonts	46 characters
Only Numbers	52 characters

11. The nomenclature ordered by the Energy Bureau for the Provisional Rider in Spanish contains 80 characters, and the Pension Rider contains 64 characters. Both exceed the maximum character limits for a single line, thereby requiring the use of two lines to display the full nomenclature. Therefore, if the Energy Bureau determines that a rider must be confined to a single line, LUMA respectfully requests that any revised nomenclature consider the character limits outlined above.

12. Furthermore, should the Energy Bureau require LUMA to revise the nomenclature due to line limitations, LUMA respectfully requests an opportunity to engage in an informal discussion with the Energy Bureau personnel to explore what is mechanically feasible within the constraints of its billing design system.

13. Finally, it must be noted that once the Energy Bureau issues an order requiring changes to the Model Bill, the vendor may take five business days to produce mock-ups (excluding the implementation process). LUMA respectfully requests that the Energy Bureau take this timeline into consideration when issuing future directives.

IV. REQUEST

WHEREFORE, LUMA respectfully requests that the Energy Bureau (i) take notice of the above-stated; (ii) accept the revised Exhibit 1 attached hereto; and (iii) authorize LUMA to implement the amended Model Bill effective September 1, 2025, following the directives of the August 13 Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of August, 2025.



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CERTIFICATE OF SERVICE

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).

In San Juan, Puerto Rico, this 20th day of August 2025.

/s Katuska Bolaños Lugo
Katuska Bolaños Lugo

Exhibit 1

EXHIBIT 1

Revised Model Bill

On August 13, 2025, the Puerto Rico Energy Bureau (Energy Bureau or PREB) issued a Resolution and Order (August 13 R&O)¹ conditionally granted LUMA's request for approval of revisions to the LUMA Model Bill filed² on August 12, 2025, subject to the following conditions:

“LUMA shall modify its Model Bill to incorporate the two new provisional rate riders using the following, and only the following, nomenclature, in English and Spanish, respectively:

- **Rider PROVISIONAL** - Provisional Rate Adjustment (operations costs FY26) /
Cláusula PROVISIONAL - Ajuste por tarifa provisional (costos operacionales AF26)
- **Rider - PENSION PAYMENTS** - Rate Adjustment (pension costs)
Cláusula PAGO DE PENSIONES - Ajuste por tarifa costos de pensión”³

In compliance with the August 13 R&O, LUMA is requesting PREB's approval to modify the Model Bill to include the above-mentioned line items: one for the provisional rate adjustment and the other for the pension costs. These new line items will appear as new lines inside the “Reconciliation Clauses and Riders” column of the Current Charges Detail Section on page three (3) of the Model Bill, as illustrated in Figure 1.

It is worth noting that incorporating the full language mandated by the Energy Bureau alters the structure of the Model Bill as previously approved. Specifically, it necessitates the addition of a second line to accommodate the detailed nomenclature ordered by the Energy Bureau for each rider in both languages. If the Energy Bureau determines that this modification does not align with its expectations for the Model Bill format, LUMA respectfully informs that its vendor has advised of the following character limitations for the bill printing system:

Table Error! No text of specified style in document.. Customer Bill Model Character Limitations

Type of content	Maximum number of characters
Only Font W	29 characters
Only Font A	41 characters
Mix Fonts	46 characters
Only Numbers	52 characters

¹ Resolution and Order of August 13, 2025, Docket No. NEPR-MI-2021-0008.

² LUMA's Motion Requesting Approval of Revisions to the LUMA Model Bill to Incorporate Provisional Riders Approved on July 31, 2025, of August 12, 2025, Docket No. NEPR-MI-2021-0008.

³ Resolution and Order of August 13, 2025, Docket No. NEPR-MI-2021-0008.

EXHIBIT 1

Revised Model Bill

The nomenclature ordered by the Energy Bureau for the Provisional Rider in Spanish contains 80 characters, and the Pension Rider contains 64 characters. Both exceed the maximum character limits for a single line, thereby requiring the use of two lines to display the full nomenclature. Therefore, if the Energy Bureau determines that a rider must be confined to a single line, LUMA respectfully requests that any revised nomenclature consider the character limits outlined above.

It is further informed that once the Energy Bureau issues an order requiring changes to the Model Bill, the vendor may take five business days to produce mock-ups (excluding the implementation process). LUMA respectfully requests that the Energy Bureau take this timeline into consideration when issuing future directives.

EXHIBIT 1

Revised Model Bill

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	425 kWh x \$0.04944	\$21.01
Additional Consumption Charge	107 kWh x \$0.05564	\$5.95
Sub-Total		\$30.96
Reconciliation Clauses and Riders		
Rider FCA - Fuel Charge Adj	532 kWh x \$0.128051	\$68.12
Rider PPCA - Purchase Power Charge Adj	532 kWh x \$0.036023	\$19.16
Rider CILTA - Municipalities Adj	532 kWh x \$0.003755	\$2.00
Rider SUBA - Subsidies, Public Light, & Other Subv HH	532 kWh x \$0.010847	\$5.77
Rider SUBA - Subsidies, Public Light, & Other Subv NHH	532 kWh x \$0.000916	\$0.49
Rider EE - Energy Efficiency Charge	532 kWh x \$0.000853	\$0.45
Rider PROVISIONAL - Rate Adjustment (pension costs)	532 kWh x \$0.019191	\$10.21
Rider - PENSION PAYMENTS Provisional Rate Adjustment (operations costs FY26)	532 kWh x \$0.014931	\$7.94
Sub-Total		\$114.14
Total		\$145.10
DETALLE DE LOS CARGOS CORRIENTES		
DESCRIPCIÓN	TARIFA	CARGO
Cargos por Servicio		
Cargo por Cliente		\$4.00
Cargo por Consumo	425 kWh x \$0.04944	\$21.01
Cargo por Consumo Adicional	107 kWh x \$0.05564	\$5.95
Subtotal		\$30.96
Cláusulas de Reconciliación		
Cláusula FCA-Ajuste Cargo de Combustible	532 kWh x \$0.128051	\$68.12
Cláusula PPCA-Ajuste por Compra de Energía	532 kWh x \$0.036023	\$19.16
Cláusula CILT-CELI (Municipios)	532 kWh x \$0.003755	\$2.00
Cláusula SUBA-Subsidios NHH	532 kWh x \$0.010847	\$5.77
Cláusula SUBA-Subsidios NHH	532 kWh x \$0.000916	\$0.49
Cláusula EE-Cargo Eficiencia Energética	532 kWh x \$0.000853	\$0.45
Cláusula PAGO DE PENSIONES - Ajuste por tarifa costos de pensión	532 kWh x \$0.014931	\$7.94
Cláusula PROVISIONAL - Ajuste por tarifa provisional (costos operacionales AF26)	532 kWh x \$0.019191	\$10.21
Subtotal		\$114.14
Total		\$145.10