

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

NEPR

Received:

Aug 29, 2025

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IN RE:

REVIEW OF LUMA'S MODEL BILL

CASE NO.: NEPR-MI-2021-0008

SUBJECT: Corrected Exhibit 1 to Motion in Compliance with Order Entered on August 13, 2025 and Amending Model Bill Proposal

**MOTION TO SUBMIT CORRECTED EXHIBIT 1 TO MOTION IN COMPLIANCE
WITH ORDER ENTERED ON AUGUST 13, 2025 AND AMENDING MODEL BILL
PROPOSAL**

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:

1. Earlier today, August 29, 2025, LUMA filed with the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") a *Motion in Compliance with Order Entered on August 13, 2025 and Amending Model Bill Proposal*, which included an Exhibit 1.

2. After this submittal, it came to LUMA's attention that, by inadvertence, there was a formatting error in Exhibit 1 which resulted in the inability to view some of the text in the Exhibit. LUMA has prepared a corrected version of this Exhibit 1, which is attached as *Exhibit A* to this Motion. LUMA respectfully requests the Energy Bureau to substitute the mentioned Exhibit 1 with the attached corrected version in *Exhibit A* herein.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **accept** *Exhibit A* herein in substitution of the Exhibit 1 to LUMA's *Motion in Compliance with Order Entered on August 13, 2025 and Amending Model Bill Proposal* filed today.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th 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 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).



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147
Fax 939-697-6147

/s/ Laura T. Rozas
Laura T. Rozas
RUA No. 10,398
laura.rozas@us.dlapiper.com

Exhibit A

Corrected Exhibit 1 to LUMA's *Motion in Compliance with Order Entered on August 13, 2025
and Amending Model Bill Proposal*

Revised Model Bill

On August 21, 2025, LUMA submitted a *Motion Submitting Revised Version of Model Bill in Compliance with August 13th Order*¹ (August 21 Motion). LUMA highlighted that incorporating all the changes mandated by the Puerto Rico Energy Bureau (Energy Bureau) in its August 13 Order altered the structure of the Model Bill as previously approved. Specifically, it necessitated the addition of a second line to accommodate the detailed nomenclature ordered by the Energy Bureau for each rider in both languages. LUMA stated that if the Energy Bureau determined that this modification did not align with its expectations for the Model Bill format, its vendor had advised of the following character limitations for the bill printing system:

Table 1. 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

The nomenclature ordered by the Energy Bureau for the Provisional Rider in Spanish contained 80 characters, and the Pension Rider contained 64 characters. Both exceeded the maximum character limits for a single line, thereby requiring the use of two lines to display the full nomenclature.

LUMA also 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 requested that the Energy Bureau consider this timeline when issuing future directives.

On August 25, 2025, the Energy Bureau issued a Resolution and Order (August 25 Order) establishing that:

“LUMA shall amend its revised Model Bill to incorporate the following nomenclature, in English and Spanish, respectively:

- **Rider PROVISIONAL** - Provisional Adjustment
Cláusula PROVISIONAL - Ajuste provisional
- **Rider PENSION PAYMENTS** - Adjustment pension costs
Cláusula PAGO DE PENSIONES – Ajuste costos pensión”²

In accordance with the August 25 Order, LUMA modified the Model Bill to align with the Order in both English and Spanish versions. The required new riders will appear as new line items inside the

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

² Page 2 of Resolution and Order of August 25, 2025, Docket No. NEPR-MI-2021-0008.

Revised Model Bill

“Reconciliation Clauses and Riders” section on the Current Charges Detail table on page three (3) of the Model Bill, as illustrated in Figure 1.³

LUMA respectfully informs the Energy Bureau that, while it has diligently complied with the August 25 Order, modifications to the Model Bill within compressed timeframes constitute an atypical process that significantly increases the risk of inadvertent errors, given the technical complexity of the billing system. It is important to note that each revision requires a significant investment of resources and external vendors’ services costs to ensure accuracy and quality assurance. LUMA respectfully requests that the Energy Bureau take these operational and procedural considerations into account when ordering future modifications of this nature, so that compliance can be achieved efficiently while upholding the accuracy, clarity, and quality standards expected by the Energy Bureau and required for the benefit of customers.

³ Due to the constraints in the timeline for the billing system configuration, by inadvertent error, the Spanish version of the “Cláusula Provisional – Ajuste provisional” was configured to read as follows: “Cláusula Provisional – Ajuste Provisional”, which capitalizes the first letter of the word “provisional”. However, this is consistent with the English version “Rider Provisional- Provisional Adjustment” in which this word is capitalized. LUMA understands that this is a non-substantive matter and should not affect moving forward with issuing the bills with this nomenclature as set forth in this Exhibit starting on September 1, 2025. If the Energy Bureau understands that the capitalized letter in question should be changed, LUMA respectfully requests that LUMA be allowed to make this change for the October billing cycle given that there would not be sufficient time to reconfigure the billing system by September 1, 2025.

EXHIBIT 1

Revised Model Bill

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

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	410 kWh x \$0.05564	\$22.81
Subtotal		\$47.82
Cláusulas de Reconciliación		
Cláusula FCA-Ajuste Cargo de Combustible	835 kWh x \$0.102718	\$85.77
Cláusula PPCA-Ajuste por Compra de Energía	835 kWh x \$0.04166	\$34.79
Cláusula CILTA-CELI (Municipios)	835 kWh x \$0.004417	\$3.69
Cláusula SUBA-Subsidios HH	835 kWh x \$0.012558	\$10.49
Cláusula SUBA-Subsidios NHH	835 kWh x \$0.001091	\$0.91
Cláusula EE-Cargo Eficiencia Energética	835 kWh x \$0.000853	\$0.71
Cláusula PAGO PENSIONES - Ajuste costos pensión	835 kWh x \$0.019191	\$16.02
Cláusula PROVISIONAL - Ajuste Provisional	835 kWh x \$0.014931	\$12.47
Subtotal		\$164.85
Total		\$212.67

CURRENT CHARGES DETAIL		
DESCRIPTION	TARIFF	CHARGE
Service Charges		
Customer Charge		\$4.00
Consumption Charge	425 kWh x \$0.04944	\$21.01
Additional Consumption Charge	475 kWh x \$0.05564	\$26.43
Sub-Total		\$51.44
Reconciliation Clauses and Riders		
Rider FCA - Fuel Charge Adj	900 kWh x \$0.102718	\$92.45
Rider PPCA-Purchased Power Charge Adj	900 kWh x \$0.04166	\$37.49
Rider CILTA-Municipalities Adj	900 kWh x \$0.004417	\$3.98
Rider SUBA-Subsidies, Public Light and other Subv HH	900 kWh x \$0.012558	\$11.30
Rider SUBA-Subsidies, Public Light & other Subv NHH	900 kWh x \$0.001091	\$0.98
Rider EE - Energy Efficiency Charge	900 kWh x \$0.000853	\$0.77
Rider PENSION PAYMENTS - Adjustment pension costs	900 kWh x \$0.019191	\$17.27
Rider PROVISIONAL - Provisional Adjustment	900 kWh x \$0.014931	\$13.44
Sub-Total		\$177.68
Total		\$229.12