

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

IN RE: PUERTO RICO ELECTRIC POWER  
AUTHORITY PERMANENT RATE

CASE NO: NEPR-MI-2020-0001

SUBJECT: Resolution and Order pertaining to *Motion Submitting FCA and PPCA Reconciliations for July and August 2025, FCA, PPCA, and FOS Calculated Factors and Memorandum of Law in Support of Confidential Treatment*, filed by LUMA Energy, LLC and LUMA Energy ServCo, LLC.

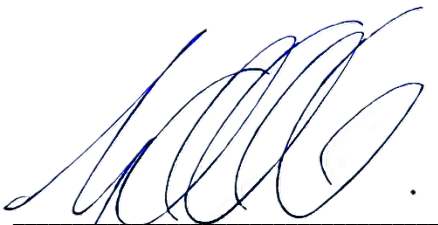
RESOLUTION AND ORDER

On September 15, 2025, LUMA Energy, LLC and LUMA Energy ServCo, LLC (referred to jointly as “LUMA”) filed before the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) a document titled *Motion Submitting FCA and PPCA Reconciliations for July and August 2025, FCA, PPCA, and FOS Calculated Factors and Memorandum of Law in Support of Confidential Treatment* (“September 15 Motion”), through which it submitted its proposed factors to be implemented starting October 1, 2025.

Upon review of the September 15 Motion, the Energy Bureau **ORDERS** LUMA and Genera PR, LLC (“Genera”) to provide their responses to the requirement of information included as **Attachment A** to this Resolution and Order **on or before 12:00p.m. on Wednesday, September 24, 2025.**

The Energy Bureau **WARNS** LUMA and Genera that failure to comply with this Resolution and Order will result in the imposition of fines, in accordance with Article 6.36 of Act 57-2014.<sup>1</sup>

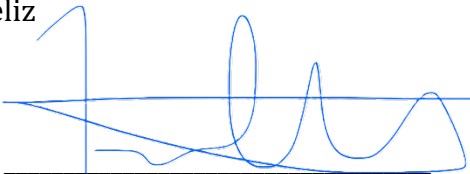
Be it notified and published.



Edison Avilés Deliz  
Chairman



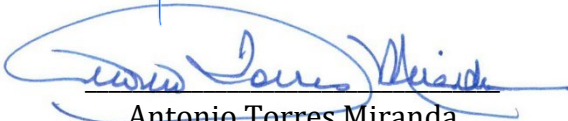
Lillian Mateo Santos  
Associate Commissioner



Ferdinand A. Ramos Soegaard  
Associate Commissioner



Sylvia B. Ugarte Araujo  
Associate Commissioner



Antonio Torres Miranda  
Associate Commissioner

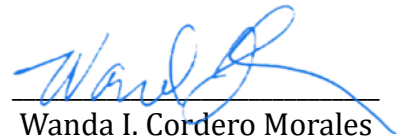
<sup>1</sup> Known as the *Puerto Rico Energy Transformation and RELIEF Act*, as amended (“Act 57-2014”).



## CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau agreed on September 19, 2025. Also certify that on September 19, 2025, I have proceeded with the filing of this Resolution and Order and was notified by email to: [jmartinez@gmlex.net](mailto:jmartinez@gmlex.net); [arivera@gmlex.net](mailto:arivera@gmlex.net); [RegulatoryPREBOrders@lumapr.com](mailto:RegulatoryPREBOrders@lumapr.com); [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov); [legal@genera-pr.com](mailto:legal@genera-pr.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); [lrn@roman-negron.com](mailto:lrn@roman-negron.com).

I sign this in San Juan, Puerto Rico, today, September 19, 2025.

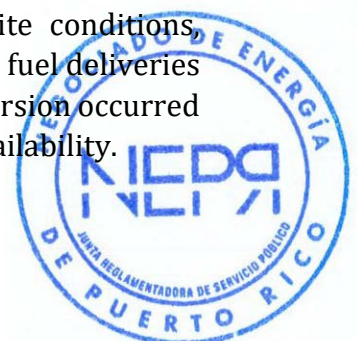
  
Wanda I. Cordero Morales  
Interim Clerk



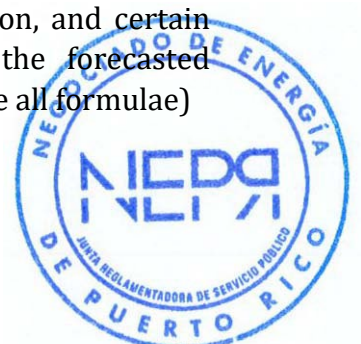
## ATTACHMENT A

### Request for Information for LUMA and Genera

- 1.1. During the months of July and August 2025:
  - a. Were there any transmission system outages that prevented generation from being supplied to serve electric load?
  - b. If the answer to part (a) is “yes” identify and explain the cause of each transmission system outage in July and August 2025 that affected the system’s ability to transmit power generated and/or purchased to serve the demand. Also, explain how these incidents did or did not affect the fuel and purchased power revenues and/or costs for the months of July and August 2025. Include supporting calculations.
  - c. Were any generating units unavailable due to unplanned or forced outages?
  - d. If the answer to part (c) is “yes” identify each forced/unplanned outage in July and August 2025 by generating unit, date, time, duration and cause. Also, explain how these incidents did or did not affect the fuel and purchased power revenues and/or costs for the months of July and August 2025. Provide an analysis, with calculations or estimates, of the impact on fuel and purchased power costs related to those outages, including but not limited to estimates of the amounts of fuel costs saved by not running the units that experienced the forced outages, and estimates of the additional costs incurred for the replacement power. If such analysis is not available, explain fully why not. Include supporting calculations.
- 1.2. During the months of July and August 2025 were any generating units run for system reliability reasons and/or because of system constraints outside of normal economic dispatch in which the lowest variable cost units are called upon first to meet load? If so, identify the days and hours in which non-economic dispatch occurred and explain the related reasons. During the months of July and August 2025 were there any hours in which sufficient generating and purchased power resources were not available to meet system demand? If so, identify the days and hours in which the available generating and purchased power resources were insufficient to fully supply the system demand and explain the related reasons why sufficient resources were not available during those hours.
- 1.3. During the months of July and August 2025 were there any days on which the most economical fuel source (*i.e.*, LNG) was not available, for any reason (*e.g.*, fuel storage replenishment), in sufficient quantities, or not available at all, at such fuel compatible generating units? If so, identify the days during which the most economical fuel source was not available, and a higher cost fuel was used for generation. Also, explain the related reasons why the most economic fuel source was not available to those generating units during those days and provide all related analysis and calculations of the related cost impacts for each month.
- 1.4. During the months of July and August 2025, were any incoming fuel deliveries diverted to another delivery location (*e.g.*, because of delivery site conditions, weather, or other causes)? If so, please identify with specificity which fuel deliveries were diverted and include a short explanation of why the delivery diversion occurred and whether it had any impact on plant operations and generation availability.



- 1.5. Was a new contract for supply of natural gas to the TM units executed? If yes, provide the following information: (i) a copy of the contract (highlighting the pricing, quantities and delivery terms), (ii) the names and job titles of the people who negotiated the contract, and (iii) certify if the identified people are employed by affiliated entities or related parties, and, if so, an explanation of the affiliated relationship.
- 1.6. For July and August 2025, were there any constraints on the power being supplied by Ecoeléctrica? If so, please identify, quantify and explain those constraints.
- 1.7. For July and August 2025, were there any days or hours in which power could not be supplied by Ecoeléctrica? If so, please identify those days and hours and explain what prevented the Ecoeléctrica power from being supplied.
- 1.8. Refer to page 5 of LUMA's September 15, 2025 Motion which addresses the establishment of the restricted reserve account for funds transferred from PREPA to LUMA, exclusively for Tranche 1 interconnection costs.
  - a. What was the balance in that restricted reserve account as of August 31, 2025?
  - b. What is the expected balance in that restricted reserve account for September 30, 2025?
  - c. Explain in detail and identify amounts from the restricted reserve account, if any, that are projected to be utilized each month, October through December 2025.
- 1.9. What is the cumulative difference between actual and forecasted dollar amounts for Customer Battery Energy Sharing ("CBES and CBES+"), including an estimate of actual costs for the remainder of September? When are payments to CBES aggregators effectuated relative to the service provided?
- 1.10. What is the cumulative difference between actual and forecasted dollar amounts for the implementation of the ASAP Program, including an estimate of actual costs for the remainder of September? When are payments to ASAP implementation providers effectuated relative to the service they provided?
- 1.11. If the actual costs for CBES and ASAP Implementation through September 2025 are exceeding LUMA's forecasted costs, is there any reason why that difference cannot or should not be amortized over three months to reduce PPCA costs for the October through December 2025 period? Explain fully.
- 1.12. Provide all invoices and documentation that justify the amounts spent on the CBES and ASAP Implementation for July and August 2025.
- 1.13. How did actual energy production, per plant, during the months of June, July and August 2025, deviate from the projections in the *July-September 2025 Proposed Factors.xlsx* file (Attachment 3, Tab) filed by LUMA in June 24, 2025. (All files provided must include all formulae)
- 1.14. Explain why energy production projections, per plant, during the months of October, November and December 2025 in the *Oct-Dec.2025 Proposed Factors.xlsx* file (Attachment 3, Tab) filed by LUMA on September 15, 2025 deviates from the energy production projections, per plant, in the *July-September 2025 Proposed Factors.xlsx* file (Attachment 3, Tab) filed by LUMA on June 24, 2025. Specifically, explain why certain base load generators show less forecasted energy production, and certain peaking units show more forecasted energy production than the forecasted production in the June 24, 2025 filing. (All files provided must include all formulae)



- 1.15. How does LUMA account for the portion of bad debt related to the Fuel and Purchased Power Cost of uncollectable bills?
- 1.16. Explain in detail how LUMA calculates the Authority Use (energy and dollar amounts) used in the reconciliation process? How are these costs recovered?

