

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

NEPR

Received:

Sep 26, 2025

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IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

SUBJECT: LUMA's Submission of Supplement to Responses to Request for Information Presented on September 23, 2025 and Memorandum of Law in Support of Request for Confidential Treatment

**SUBMISSION OF SUPPLEMENT TO RESPONSES TO REQUEST FOR
INFORMATION PRESENTED ON SEPTEMBER 23, 2025 AND MEMORANDUM
OF LAW REQUESTING CONFIDENTIAL TREATMENT**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and LUMA Energy Servco, LLC (jointly referred to as the "LUMA"), through the undersigned counsel, and respectfully state and request the following:

I. Introduction

LUMA respectfully submits this motion to the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") to supplement its responses to certain Requests for Information ("RFIs") issued in the *Resolution and Order* entered on September 19, 2025 ("September 19 Order"). This filing also includes a request for confidential treatment of specific data.

II. Procedural Background

1. On September 15, 2025, LUMA filed before the 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 reconciliation of the Fuel Charge Adjustment ("FCA") and the Purchased Power Charge Adjustment ("PPCA") costs for July and August 2025

and the proposed FCA, PPCA and the Fuel Oil Subsidy factors to be implemented starting October 1, 2025.

2. On September 19, 2025, the Energy Bureau issued the September 19 Order directing LUMA and Genera PR LLC to respond to various RFIs listed in Attachment A of the Order.¹

III. Supplement to Responses in Compliance with the September 19 Order

3. On September 24, 2025, LUMA submitted a document titled *Submission of Responses to Request for Information in Compliance with Order Entered on September 19, 2025 and Request for Extension of Time to Supplement* (“September 24 Motion”), which included responses to the RFIs in Attachment A of the September 19 Order.

4. In the September 24 Motion, LUMA informed the Energy Bureau that its responses to RFIs 1.1 and 1.2 included preliminary data, subject to further analysis and revision. Regarding RFI 1.12, LUMA indicated it was actively compiling relevant invoices to provide a comprehensive response. In the interim, it submitted a table identifying invoice numbers and associated costs.

5. LUMA also requested an extension until Friday, September 26, 2025, at 5:00 p.m. to supplement its responses to RFIs 1.1, 1.2, and 1.12. LUMA explained that the limited time provided by the September 19 Order did not allow for complete data verification and document compilation necessary to ensure accuracy and completeness. The Energy Bureau has not yet ruled on this request.

6. In accordance with its representations in the September 24 Motion, LUMA now submits, as Attachment A-1 to this motion, supplemental responses to RFIs 1.1 and 1.2, along with the invoices supporting the data provided in response to RFI 1.12.

¹ Promptly upon receipt of the September 19 Order, LUMA initiated coordination efforts with Genera PR LLC to ensure the RFIs would be addressed in an organized and timely manner. Pursuant to the parties’ agreement, LUMA will submit responses to RFIs numbered 1.1 through 1.2 and 1.6 through 1.16. Genera will submit responses to RFIs numbered 1.3 through 1.5.

IV. Request for Confidential Treatment

7. The responses to RFI 1.12 submitted on September 24, as well as the supplemental information included herein, are provided in redacted form to protect confidential information. The basis for this confidentiality is consistent with the arguments presented in the September 15 Motion. *See* September 15 Motion, § IX, pp. 14–18.

8. LUMA hereby incorporates by reference and adopts all legal arguments made in the September 15 Motion in support of the Energy Bureau determining that the redacted information constitutes valid confidential information and should be maintained under seal.

V. Conclusion and Request for Relief

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of LUMA’s supplemental responses to RFIs 1.1, 1.2, and 1.12, submitted in compliance with the September 19 Order; and grant LUMA’s request for confidential treatment of the redacted information included in the response to RFI 1.12, as submitted in Attachment A of the September 23 Motion and in the supplemental response submitted herein, consistent with the legal arguments set forth in Section IX of the September 15 Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of September 2025.

I hereby certify that this Motion was filed using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to the Puerto Rico Electric Power Authority, through: Lionel Santa lionel.santa@prepa.com; Alexis Rivera, arivera@gmlex.net; Juan M. Martínez Nevárez, jmartinez@gmlex.net; and Juan R. González Galarza, jgonzalez@gmlex.net; to Genera PR, LLC through: Luis Roman Negrón, lrn@roman-negron.com; legal@genera-pr.com; and regulatory@genera-pr.com; and to the Independent Consumer Protection Office, through Director Hannia Rivera, hrivera@jrsp.pr.gov.



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Attachment A
Supplemental Responses