

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

NEPR

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

CASE NO. NEPR-MI-2020-0001

SUBJECT: LUMA's Motion to Submit Updated FCA and PPCA Reconciliations for July and August 2025, and Updated Calculated FCA, PPCA and FOS Factors and Request for Confidential Treatment

**MOTION TO SUBMIT UPDATED FCA AND PPCA RECONCILIATIONS FOR JULY
AND AUGUST 2025 AND UPDATED FCA, PPCA AND FOS CALCULATED
FACTORS AND REQUEST FOR 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. Introduction¹

LUMA respectfully seeks leave to substitute the previously filed Fuel Charge Adjustment ("FCA") and Purchased Power Charge Adjustment ("PPCA") reconciliations for July and August 2025, along with the corresponding calculated FCA, PPCA, and Fuel Oil Subsidy ("FOS") factors, to be implemented effective October 1, 2025. This submission also incorporates a request for confidential treatment of the supporting Excel files, as further explained herein.

II. Procedural Background

1. On September 15, 2025, LUMA filed with the Energy Bureau its "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"). In

¹ Capitalized terms not defined herein shall be ascribed the meaning provided in the September 15 Motion.

this filing, LUMA submitted its proposed reconciliation of FCA and PPCA costs for July and August 2025, as well as the proposed FCA, PPCA, and FOS factors to be implemented starting October 1, 2025. The calculated Quarterly Riders factors proposed with the September 15 Motion were:

Adjustment Clause	Factor (\$/kWh)
FCA	\$0.120661
PPCA	\$0.044477
FOS	\$0.021510

2. On September 19, 2025, the Energy Bureau issued the September 19 Order directing LUMA and Genera PR LLC to respond to various Requests for Information (RFIs) listed in Attachment A of the 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. On September 26, 2025, LUMA presented to the Energy Bureau a document with the title *Submission of Supplement to Responses to Request for Information Presented on September 23, 2025 and Memorandum of Law Requesting Confidential Treatment* with responses that supplement RFIs 1.1, 1.2, and 1.12.

7. That same day, the Energy Bureau issued a Resolution and Order (“September 29 Order”) with multiple RFIs directed to LUMA and Genera. Pursuant to the September 26 Order, the deadline to respond was September 29 at noon.

8. Upon receiving the September 16 Order, LUMA began communication with Genera to ensure the RFIs would be addressed in an organized and timely manner.

9. According to the parties’ agreement, LUMA agreed to respond to the RFI regarding Consumption of Energy for Authority Use (LUMA) (“Authority Use RFI”).

10. In compliance with the September 29 Order, earlier today, LUMA submitted a document titled Submission of Responses to Request for Information in Compliance with Order Entered on September 26, 2025, to the Energy Bureau, providing LUMA’s response to the Authority Use RFI (“September 29 Motion”). As noted in Attachment A to the September 29 Motion, while LUMA performed the necessary analysis to respond to the Authority Use RFI, it was noted that the consumption recorded for one of PREPA’s facilities needed to be amended. Consequently, the response to the Authority Use RFI was submitted using the corrected consumption.

III. Revised July and August 2025 Reconciliation and Calculated Quarterly Factors to be Implemented by October 1, 2025

Amending the Authority Use consumption records thereby amends the reconciliation for July and August 2025. Therefore, in compliance with LUMA’s responsibilities under the T&D OMA, and to correct the inadvertent mistake in the consumption figures presented for the service

agreement 6839142389 Authority Use in the submission made with the September 15 Motion, LUMA hereby submits the revised reconciliation for July and August 2025 along with the updated calculated factors to be effective starting October 1, 2025.

IV. Amended Quarterly Reconciliations of FCA and PPCA for July and August 2025 FCA and PPCA Riders

The reconciliations submitted with this Motion, as detailed in the file entitled “*FAC-PPAC Reconciliation Jul-Aug25_Updated.xlsx*” include the reconciliations of the FCA and PPCA riders (costs versus revenues) and the amounts to be recovered or returned for each of these riders. For the quarter, there was a total FCA revenue insufficiency of \$26,202,886.67*² and a total PPCA revenue insufficiency of \$10,043,839.22*³.

a. FCA

For July 2025, the fuel costs and prior period adjustments were \$173,334,059.73*, and revenues totaled \$166,821,870.18. There is a credit pertaining to the return of LGA OMA billed in June of \$10 million, resulting in an excess revenue of \$3,487,810.45*⁴.

For August 2025, the fuel costs and prior period adjustments were \$169,783,935.62*, and revenues totaled \$140,093,238.50. There was a revenue insufficiency of \$29,690,697.12*⁵.

² The updated figures are marked with an asterisk (*).

³ The insufficiency reflected in the September 15 Motion was \$9,855,055.78. Accordingly, the difference between that amount and the total insufficiency presented today is -\$188,783.44.

⁴ The excess revenue reflected in the September 15 Motion was \$3,647,500.57. Accordingly, the difference between that amount and the total excess revenue presented today is -\$159,690.12.

⁵ The insufficiency reflected in the September 15 Motion was \$29,397,118.67. Accordingly, the difference between that amount and the total insufficiency presented today is -\$293,578.45.

b. PPCA

For July 2025, the PPCA and prior period adjustments were \$73,736,471.42*, and revenues totaled \$72,922,369.06. There was a revenue insufficiency of \$814,102.368*⁶.

For August 2025, the PPCA and prior period adjustments were \$66,095,604.59*, and revenues totaled \$56,865,867.74. There was a revenue insufficiency of \$9,229,736.85*⁷.

The CBES and ASAP implementation costs presented with the September 15 Motion remain unchanged.

V. FCA and PPCA Calculated Factors

The Excel spreadsheet titled “*Oct_Dec.2025 Updated_Proposed Factors.xlsx*” includes the proposed FCA, PPCA, and FOS factors. FCA and FOS are presented in “Attachment 1,” and the PPCA factor is presented in “Attachment 2.”

LUMA respectfully submits the following updated Quarterly Factors for the Energy Bureau’s review and consideration, applicable from October 1, 2025, to December 31, 2025:

Adjustment Clause	Factor ⁸ (\$/kWh)
FCA	\$0.120772*
PPCA	\$0.044523*
FOS	\$0.021510

⁶ The insufficiency reflected in the September 15 Motion was \$73,666,755.69. Accordingly, the difference between that amount and the total insufficiency presented today is -\$69,715.73.

⁷ The insufficiency reflected in the September 15 Motion was \$65,976,536.88. Accordingly, the difference between that amount and the total insufficiency presented today is -\$119,067.71.

⁸ The updated factors are marked with an asterisk (*).

VI. Documents Filed in Support of the Quarterly Reconciliation and Calculated Quarterly Factors

Confidential Folder:

1. Precio Ponderado Analisis _ 2025.08.31.xlsx
2. Oct_Dec.2025 Updated_Proposed Factors.xlsx*⁹
3. FAC-PPAC Reconciliation Jul-Aug25_Updated.xlsx*

Values Folder:

1. Inventory (Fuel) – August 31, 2025:
 - a. GPR_Fuel Inventory_Weighted Average Price Report_PREPA SYSTEM_2025.08.31.pdf
 - b. Precio Ponderado Analisis _ 2025.08.31_Values.xlsx
 - i. AGUIRRE_TANK INVENTORY_2025.08.31.pdf
 - ii. CAMBALACHE_Tank Inventory_2025.08.31.pdf
 - iii. COSTA SUR_TANK INVENTORY_2025.08.31.pdf
 - iv. DAGUAO_TANK INVENTORY_2025.08.31.pdf
 - v. JOBOS_TANK INVENTORY_2025.08.31.pdf
 - vi. MAYAGÜEZ_TANK INVENTORY_2025.08.31.pdf
 - vii. PALO SECO_TANK INVENTORY_2025.08.31.pdf
 - viii. SAN JUAN_TANK INVENTORY_2025.08.31.pdf
 - ix. YABUCOA_TANK INVENTORY_2025.08.31.pdf
2. Oct_Dec.2025 Updated_Proposed Factors_Values.xlsx*
3. FAC-PPAC Reconciliation Jul-Aug25_Updated_Values.xlsx*

⁹ The updated documents are marked with an asterisk (*).

VII. Request for Confidential Treatment of Excel Files and Supporting Memorandum of Law

11. LUMA herein submits additional Excel spreadsheets in native format (.xlsx) with formulae intact, which are identical in structure and content to those previously submitted, except for certain updated figures.

12. These spreadsheets contain original calculations and formulas developed by LUMA personnel and include sensitive commercial information and confidential procedures belonging to LUMA and/or PREPA.

13. Accordingly, LUMA incorporates by reference the Section IX titled *Request for Confidential Treatment of Excel Files and Supporting Memorandum of Law*, included in the September 15 Motion *supra*, as the legal and factual grounds for requesting confidential treatment of the newly submitted Excel files remain unchanged.

14. The files submitted under seal today are likewise Valid Confidential Information, and LUMA respectfully requests that they be received, kept, and maintained confidentially by the Energy Bureau, pursuant to the applicable laws, regulations, and policies cited in the incorporated section.

VIII. Conclusion and Request for Relief

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the aforementioned, accept the filing of the updated Quarterly Reconciliation for July through August 2025, and the updated calculated Quarterly Rider factors to start on October 1, 2025; and grant the request to keep confidentially the spreadsheets that have been filed in excel format and with formulae in the file entitled *Confidential* that is submitted with this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th 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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/s/ Margarita Mercado Echegaray

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Updated September 15 Motion Exhibit 1

Updated Quarterly Reconciliation and Updated Quarterly Riders

Files to be submitted via email