

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

NEPR

Received:

Sep 29, 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 Responses to
Request for Information in Compliance with Order
Entered on September 26, 2025

**SUBMISSION OF RESPONSES TO REQUEST FOR INFORMATION IN
COMPLIANCE WITH ORDER ENTERED ON SEPTEMBER 26, 2025**

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 submit this motion to the Puerto Rico Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") to comply with the *Resolution and Order* entered on September 26, 2025 ("September 26 Order"). Specifically, this filing includes LUMA's response to the Request for Information ("RFI") concerning *Consumo de Energía en Authority Use (LUMA)*, as set forth in the September 26 Order.

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

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.

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 and respective responsibilities, LUMA would submit responses to RFIs numbered 1.1 through 1.2 and 1.6 through 1.16. Genera would address responses to RFIs numbered 1.3 through 1.5.

7. That same day, the Energy Bureau entered a *Resolution and Order* with multiple requests for information directed to LUMA and Genera. Pursuant to the September 26 Order, the deadline to answer these responses is today, September 29, at noon.

III. Responses to Request for Information

8. Promptly upon receipt of the September 16 Order, LUMA initiated coordination efforts with Genera to ensure the RFIs would be addressed in an organized and timely manner.

9. Pursuant to the parties' agreement and delegated responsibilities, LUMA will submit responses to the RFI identified as *Consumption of Energy for Authority Use (LUMA)*.

10. In accordance with the September 29 Order and the allocation of responsibilities for responding to each RFI, as discussed with Genera, LUMA respectfully submits its response to the RFI *Consumo de Energía en Authority Use (LUMA)*. See Attachment A.

IV. Conclusion and Request for Relief

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of LUMA's response to the RFI concerning *Consumo de Energía en Authority Use (LUMA)*, submitted in compliance with the September 26 Order.

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, ln@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

Permanent Rate

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20250926-PREB-4

SUBJECT

Consumo de Energía en Authority Use (LUMA)

REQUEST

Explique en detalle el incremento desproporcional y la variación, de mes a mes, del consumo eléctrico en las facilidades de PREPA que comprende el total de consumo eléctrico registrado como *Authority Use* en las últimas dos propuestas de reconciliación sometidas por LUMA. Para referencia, ver abajo las cantidades de energía consumidas por las facilidades de PREPA en los meses de junio, julio y agosto de 2025.

- a. 2,510,021 kwh in June 2025
- b. 4,957,702 kwh in July 2025
- c. 6,197,383 kwh in Aug 2025

RESPONSE

Luego del análisis realizado, se encontró que la variación de mes a mes fue el resultado de un error en la lectura utilizada en la facturación de una localidad bajo la titularidad de la Autoridad de Energía Eléctrica de Puerto Rico en voltaje primario. El error ha sido corregido, la reconciliación presentada el 15 de septiembre de 2025 ha sido actualizada y se estará presentando a su vez la propuesta de factores para el periodo de 1 de octubre de 2025 a 31 de diciembre de 2025 con su respectiva corrección.

Para detalle del análisis realizado favor referirse a “*Authority Use Consumption - PREB RFI 9.29.2025.xlsx*”. Se presenta el detalle de la localidad sobreestimada, resaltada en color verde.