

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

IN RE:

LUMA'S ACCELERATED STORAGE
ADDITION PROGRAM ("ASAP")

CASE NO. NEPR-MI-2024-0002

**SUBJECT: Informative Motion and
Request for Modification of October 3,
2025, Order**

NEPR

Received:

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**INFORMATIVE MOTION AND REQUEST FOR MODIFICATION OF OCTOBER 3,
2025, ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On October 3, 2025, the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("October 3rd Order") whereby it vacated the stay of the instant proceeding and ordered LUMA "to offer the Phase 1 Standard Offer Agreement ("SO1") to Phase 2 proponents that are interested and agree without reservations to accept the terms established thereby." *See* October 3rd Order, p. 1. The Energy Bureau also directed LUMA to identify and notify potential candidates within five (5) days from the notification of the October 3rd Order, and within five (5) days thereafter, proceed with the submittal of such contracts before the Energy Bureau for its review and approval. *See id.*

2. LUMA respectfully informs that LUMA has identified several issues associated with the SO1 template that need to be addressed and/or resolved prior to distribution of the SO1

to Phase 2 proponents, including issues relating to interconnection costs, conditions precedent to agreement effectiveness, and cost recovery mechanisms. These are just some issues that LUMA has preliminarily identified. LUMA is in the process of more comprehensively identifying and analyzing all the implications of the PREB Order and will be submitting to the Energy Bureau no later than October 17, along with LUMA's recommendations. Resolution and definition of these issues prior to the distribution of the SO1 to Phase 2 participants will provide greater certainty and ensure that the transactions reflect conditions that guarantee affordable, just and reasonable energy costs for all consumers and pursue energy storage goals that best suit the needs of Puerto Rico.

4. Given the above, LUMA respectfully requests this Honorable Energy Bureau to modify the October 3rd Order to suspend the distribution of the SO1 to potential Phase 2 participants until after the resolution of the pending issues that will be more fully identified and discussed in the mentioned upcoming motion, so that the Energy Bureau can decide on the terms that will better support the successful execution of the ASAP program by these Phase 2 participants.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **modify** the October 3rd Order to suspend the requirement to submit SO1 to Phase 2 proponents until after the Energy Bureau resolves the pending issues to be expanded upon in a motion to be submitted by LUMA within the next five (5) business days.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of October 2025.

We hereby certify that we filed this Motion was filed using the electronic filing system of this Energy Bureau and we will send a courtesy copy of this motion to hrivera@jrsp.pr.gov, oramos@pmalaw.com, and agraitfe@agraitlawpr.com.



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