

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

NEPR

Received:

Oct 14, 2025

7:58 PM

IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO. NEPR-MI-2022-0001

SUBJECT: Motion to Submit October 2025 Report on the
Development of the Pilot Emergency Backup Generators
Demand Response Program

**MOTION TO SUBMIT OCTOBER 2025 REPORT ON THE DEVELOPMENT OF THE
PILOT EMERGENCY BACKUP GENERATORS DEMAND RESPONSE PROGRAM**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

I. Introduction

Since January 15, 2025, LUMA has been submitting to the Puerto Rico Energy Bureau (“Energy Bureau”) monthly reports on the development of a pilot Emergency Backup Generator Demand Response Program (now referred to as the “Emergency Load Reduction Program”). This program aims to address the energy generation shortfall forecasted for the summer of 2025 (period from June 2025 to October 2025), through the deployment of emergency backup generators during defined emergency demand response events to prevent load shedding events that could result in impacts to a significant number of customers.

In addition, as directed by the Energy Bureau, LUMA submitted to the Energy Bureau, on May 21, 2025, its proposal for the Emergency Load Reduction Program, which was approved by

the Energy Bureau with certain conditions, while directing LUMA to continue providing monthly reports.

LUMA is now submitting, as *Exhibit 1* to this Motion, the report for October 2025 on the status of this pilot program.

II. Relevant Procedural History

1. On October 23, 2024, the Energy Bureau issued a Resolution and Order (“October 23rd Order ordering LUMA to submit a program for the use of backup generators as a demand resource in emergency situations before the summer of 2025 (that is, the Emergency Load Reduction Program) and file monthly reports on the 15th of each month, beginning on January 15, 2025, detailing LUMA’s efforts to design and implement the program.”¹

2. On January, February, March, April and May, 2025, LUMA submitted monthly progress reports on the Emergency Load Reduction Program to the Energy Bureau.² In these reports, LUMA informed on the progress of the development of the program, potential constraints to enrollment due to the restrictions on the air emissions permits of participants, and the potential that formal enrollment in the program would not occur without a waiver of these restrictions by the relevant agencies.³

3. On May 21, 2025, LUMA filed with the Energy Bureau its proposal for the Emergency Load Reduction Program.⁴

¹ See October 23rd Order, pp. 4-5.

² See *Motion to Submit January 2025 Report on the Development of the Backup Generators Emergency Demand Response Program*; *Motion to Submit February 2025 Report on the Development of the Backup Generators Emergency Demand Response Program*; *Motion to Submit March 2025 Report on the Development of the Backup Generators Emergency Demand Response Program*; *Motion to Submit April 2025 Report on the Development of the Backup Generators Emergency Demand Response Program*; and *Motion to Submit May 2025 Report on the Development of the Backup Generators Emergency Demand Response Program*.

³ See *id.*

⁴ See *Motion to Submit Proposal for Emergency Load Reduction Program in Compliance with Resolution and Order of April 30, 2025*

4. On June 13, 2025, LUMA filed with the Energy Bureau the monthly report on the development of the Emergency Load Reduction Program.⁵

5. On June 20, 2025, the Energy Bureau issued a Resolution and Order (“June 20th Order”) in which it approved the Emergency Load Reduction Program through October 31, 2025, but did not yet approve a program budget given uncertainties around when and if LUMA will be able to enroll participants and the number of months and events; rather, the Energy Bureau directed LUMA to file a revised budget and timeline for program implementation once LUMA finds a path to implement the ELRP, among others.⁶ In addition, the Energy Bureau directed LUMA to continue filing the monthly reports on the status of the program.⁷

6. On June, July, August and September 2025, LUMA continued to file with the Energy Bureau monthly reports on the development of the Emergency Load Reduction Program.⁸ These reports described LUMA’s continued efforts with the relevant agency to support the necessary actions to facilitate customer participation and its continued work and outreach with stakeholders, among other actions.⁹

III. Submittal of Report on Emergency Load Reduction Program

7. In compliance with the October 23rd Order and June 20th Order, LUMA submits with this Motion its report for October 2025 on the status of the Emergency Load Reduction Program. *See Exhibit 1* (the “Report”).

⁵ See Motion to Submit June 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.

⁶ See June 20th Order, p. 3.

⁷ See *id.*

⁸ See Motion to Submit June 2025 Report on the Development of the Backup Generators Emergency Demand Response Program; Motion to Submit July 2025 Report on the Development of the Backup Generators Emergency Demand Response Program; Motion to Submit August 2025 Report on the Development of the Backup Generators Emergency Demand Response Program; and Motion to Submit September 2025 Report on the Development of the Backup Generators Emergency Demand Response Program.

⁹ See *id.*

8. **WHEREFORE**, LUMA respectfully requests that the Energy Bureau take notice of the aforementioned and accept the Report included in *Exhibit 1* in compliance with the October 23rd Order and the June 20th Order with respect to the submittal of monthly reports on the development/status of the Emergency Load Reduction Program.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of October 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion the Independent Office for Consumer Protection at hrivera@jrsp.pr.gov; PREPA at arivera@gmlex.net; and mvalle@gmlex.net; and agraitfe@agraitlawpr.com; info@sesapr.org; bfrench@veic.org; evand@sunrun.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; javrua@sesapr.org; pjcleanenergy@gmail.com; cfl@mcvpr.com; mqs@mcvpr.com; and mrrios@arroyorioslaw.com.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9147
Fax 939-697-6147
/s/ Laura T. Rozas
Laura T. Rozas
RUA No. 10,398
laura.rozas@us.dlapiper.com

Exhibit 1

Demand Response: Emergency Load Reduction Program Monthly Report



Demand Response: Emergency Load Reduction Program Monthly Report

NEPR-MI-2022-0001

October 14, 2025

Emergency Load Reduction Program Monthly Report

Key Activity Summary
- On September 17, 2025, LUMA conducted a strategic follow up meeting with Environmental Protection Agency (EPA) personnel to discuss the next steps for the process for companies to obtain the Non-Action Assurance. The EPA continues working on the details of this process. - LUMA held a dedicated in-person meeting with the Pharmaceutical Industry Association on September 18, 2025, where the Demand Response team provided a comprehensive update on the program's alignment with EPA air permit requirements and addressed additional inquiries raised by the Association. - To support program optimization and compliance tracking, LUMA proactively conducted an analysis of demand data for a customer who recently enrolled in the Emergency Load Reduction Program (ELRP). - During the Energy Efficiency (EE) stakeholder workshop held on September 30, 2025, aspects of the ELRP program were presented and discussed with the participants of the workshop. - A communication will be issued to the relevant government agencies to address the best approach for the Non-Action Assurance.
Risk / Issues:
Due to the current uncertainty regarding the number of future participants who will ultimately enroll, a specific budgetary forecast for approval is not available at this time.

Key Milestones	Date	Status
Continued alignment with internal departments for the re-launch of the Backup Generator Demand Response pilot.	Ongoing	B
Refine and revise Backup Generator Demand Response pilot program terms and customer outreach materials as needed.	Ongoing	B
Work with stakeholders to discuss limitations of EPA regulations for Backup Generators.	Ongoing	B
Conduct outreach to target industrial customers to recruit and gather additional input.	Ongoing	B
Initial customer agreements signed and program ready for events.	Ongoing	Y

B On target **Y** Caution **O** Off plan **G** Complete





People First.
Safety Always.

LUMA