

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

NEPR Received: Oct 17, 2025 5:08 PM
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IN RE: REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

CASE NO.: NEPR-AP-2023-0004

SUBJECT: Motion Requesting Extension of
the Review Period for Determination of
Completeness

**MOTION REQUESTING EXTENSION OF THE REVIEW PERIOD FOR
DETERMINATION OF COMPLETENESS**

TO THE HONORABLE 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:

1. On May 13, 2025, the Energy Bureau issued a Resolution and Order setting October 17, 2025, as the date for LUMA to submit the 2025 Integrated Resource Plan (“2025 IRP”), specifically the primary sections of Regulation 9021 that require resource plan development, selection of a Preferred Resource Plan, and reporting on existing and planned transmission and distribution system elements (“May 13th Order”). Further, the Energy Bureau provided two additional filing deadlines: (a) November 21, 2025, to file the portion of the requirements that commands LUMA to test the Preferred Resource Plan to determine any implications it may have on the transmission and distribution system; and (b) “shortly thereafter” November 21, 2025 to file the “Supplemental” modeling runs identified the May 13th Order.

2. Furthermore, the May 13th Order stated that the Energy Bureau will review the October 17, 2025, filing for completeness in alignment with the *Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority*, Regulation No. 9021, dated April 20, 2018

(“Regulation 9021”). Thus, the requirement of Section 2.03(J)(2)(e) of Regulation 9021 concerning the implications of the Preferred Resource Plan on the transmission and distribution system was conditionally waived. The condition is that LUMA will file the supplemental material associated with that requirement after selecting a Preferred Resource Plan.

3. Section 3.02(A) of Regulation 9021 provides that within thirty (30) days from the date on which the proposed IRP is filed, the Energy Bureau shall review the IRP filing to determine whether it complies in full with the requirements of the regulation. *See* Section 3.02(A) of Regulation 9021. If the Energy Bureau determines that the 2025 IRP complies with Regulation 9021, it will issue a resolution finding the 2025 IRP complete, and the adjudicative process may begin. *See* Section 3.02(A)(1) of Regulation 9021. However, Section 3.02(B) establishes that the Energy Bureau, at its discretion, may extend its review period to determine whether the 2025 IRP filing complies with the requirements of Regulation 9021. *See* Section 3.02(B) of Regulation 9021.

4. Today, LUMA filed a *Motion Submitting 2025 IRP and Request for Confidential Treatment*. Therein, LUMA submitted the 2025 IRP recommending that the Energy Bureau approve Resource Plan Hybrid A as LUMA’s Preferred Resource Plan. Resource Plan Hybrid A represents a balanced, cost-effective path to meeting Puerto Rico’s energy needs, reflecting current expectations for fuel and technology costs.

5. As ordered by the Energy Bureau, LUMA will file on November 21, 2025, the portion under Section 2.03(J)(2)(e) of Regulation 9021, which requires additional analysis on the Preferred Resource Plan to determine any implications it may have on the transmission and distribution system. Once this step is complete and in accordance with the requirement to file the Supplemental Scenarios shortly thereafter, given the complex, time-consuming process for

modeling scenarios and analyzing results, LUMA will submit the Supplemental Scenarios on or before December 12, 2025.

6. The Energy Bureau's review of the 2025 IRP Filing for completeness is better served if it considers the analysis required under Section 2.03(J)(2)(e) of Regulation 9021 to perform a fulsome review of the 2025 IRP and the modeling of the Supplemental Scenarios..

7. Furthermore, as the Energy Bureau is cognizant, LUMA is currently involved in the proceeding *Puerto Rico Electric Power Authority Rate Review*, Case No. NEPR-AP-2023-0003 (“Rate Review Process”), which is scheduled for an evidentiary hearing from November 12 through December 19, 2025. LUMA will have to devote considerable resources and time to that proceeding during that timeframe, and many of the LUMA staff engaged in the Rate Review Process are also engaged in the 2025 IRP process.

8. As discussed previously, it is LUMA’s contention that only when the Supplemental Scenarios and the analysis required under Section 2.03(J)(2)(e) of Regulation 9021 are filed, the Energy Bureau will have a complete picture to conduct a review for completeness in this instant proceeding. Thus, triggering the period for review completeness on October 17, 2025, will omit those important components. Moreover, starting the 30-day completeness review process on October 17th could prompt a determination of completeness and the commencement of the adjudicative proceeding in this instant case by November 16, 2025, during the middle of the evidentiary hearing of the Rate Review Process. Unfortunately, at this juncture, LUMA does not have the resources to conduct two proceedings of this nature simultaneously.

9. Considering the aforementioned, for completeness determination purposes, LUMA respectfully requests the Energy Bureau to determine that the 2025 IRP is filed on the date the Supplemental Scenarios are submitted, which LUMA plans to file on or before December 12,

2025. This would allow the Energy Bureau to consider the implications of the Preferred Resource Plan on the transmission and distribution system in any completeness determination. In addition, it will avoid the commencement of this instant adjudicative proceeding during the course of the evidentiary hearing of the Rate Review Process.

10. In the alternative, LUMA requests that the Energy Bureau extend its review period to determine whether the 2025 IRP filing complies with the requirements of Regulation 9021 until after December 19, 2025, to consider the Supplemental Scenarios. This scenario would also allow the Energy Bureau to consider all primary and supplemental scenarios, the implications of the Preferred Resource Plan on the transmission and distribution system, and any determination on the Rate Review Case that could be impacted by the 2025 IRP Preferred Resource Plan.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned for all purposes, **determine**, for completeness determination purposes, that the 2025 IRP is filed on the date the Supplemental Scenarios are submitted, that is, on or before December 12, 2025, or, in the alternative, extend its review period to determine whether the 2025 IRP filing complies with the requirements of Regulation 9021 until after December 19, 2025, when the Rate Review Process evidentiary hearings have concluded.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to the Puerto Rico Electric Power Authority: lionel.santa@prepa.pr.gov and through its attorneys of record Mirelis Valle-Cancel, mvalle@gmlex.net; and Alexis G. Rivera Medina, arivera@gmlex.net; and Genera PR, LLC, through its attorney of record Luis R. Román Negrón, lrn@roman-negrom.com.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 17, 2025.



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