

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

NEPR

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**IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW**

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: Motion Submitting
Alejandro Figueroa's Surrebuttal
Testimony**

**MOTION SUBMITTING MR. ALEJANDRO FIGUEROA'S SURREBUTTAL
TESTIMONY**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU, AND ITS HEARING
EXAMINER, SCOTT HEMPLING:**

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo") (jointly, "LUMA"), and respectfully state and request the following:

1. Pursuant to the *Hearing Examiner's Order on Various Prehearing Matters*, dated October 29, 2025 ("October 29th Order"), and in accordance with the consolidated schedule contained therein, LUMA respectfully submits its surrebuttal testimonies addressing rate design, and decoupling by the October 30th deadline. Specifically, LUMA hereby submits the surrebuttal testimony of Mr. Alejandro Figueroa. *See* LUMA Exhibit 73.

2. Per the Hearing Examiner's instructions, LUMA files this surrebuttal testimony in the captioned proceeding's electronic case docket using the standard motion practice. *See* October 29th Order, at p. 6. Nevertheless, LUMA will upload and number this surrebuttal testimony on the Accion Discovery Platform pursuant to the October 29th Order's instructions on surrebuttal numbering.¹

¹ On May 9, 2025, this Energy Bureau issued a Resolution and Order, requiring that all substantive English-language filings be accompanied by concise Spanish summaries to enhance public accessibility and participation. *See also* Energy Bureau Resolution and Order of June 4, 2025 (*clarifying* that full translations are optional but summaries are mandatory). In compliance with the Energy Bureau's standing directives regarding accessibility and ensuring citizen participation, LUMA will submit the corresponding Spanish-language summary of LUMA Exhibit 73 on or before November 4, 2025.

WHEREFORE, LUMA respectfully requests that the Energy Bureau and its Hearing Examiner **take notice** of the aforementioned; and **accept** the surrebuttal testimony of Mr. Alejandro Figueroa, on behalf of LUMA.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of October, 2025.

WE HEREBY CERTIFY that this Motion was filed using was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Notice will be notified to Hearing Examiner, Scott Hempling, shempling@scotthemplinglaw.com; and to the attorneys of the parties of record. To wit, to the **Puerto Rico Electric Power Authority**, through: Mirelis Valle-Cancel, mvalle@gmlex.net; Juan González, jgonzalez@gmlex.net; Alexis G. Rivera Medina, arivera@gmlex.net; Juan Martínez, jmartinez@gmlex.net; and Natalia Zayas Godoy, nzayas@gmlex.net; and to **Genera PR, LLC**, through: Jorge Fernández-Reboredo, jfr@sbgblaw.com; Giuliano Vilanova-Feliberti, gvilanova@vvlawpr.com; Maraliz Vázquez-Marrero, mvazquez@vvlawpr.com; ratecase@genera-pr.com; regulatory@genera-pr.com; and legal@genera-pr.com; **Co-counsel for Oficina Independiente de Protección al Consumidor**, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; **Co-counsel for Instituto de Competitividad y Sustentabilidad Económica**, jpouroman@outlook.com; agraitfe@agraitlawpr.com; **Co-counsel for National Public Finance Guarantee Corporation**, epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; robert.berezin@weil.com; Gabriel.morgan@weil.com; Corey.Brady@weil.com; alexis.ramsey@weil.com; **Co-counsel for GoldenTree Asset Management LP**, lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; iglassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; **Co-counsel for Assured Guaranty, Inc.**, hburgos@cabprlaw.com; dperez@cabprlaw.com; mmcgill@gibsondunn.com; lshelfer@gibsondunn.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; **Co-counsel for Syncora Guarantee, Inc.**, escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; **Co-Counsel for the PREPA Ad Hoc Group**, dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; david.herman@dechert.com; michael.doluisio@dechert.com; stuart.steinberg@dechert.com; **Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica**, nancy@emmanuelli.law; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; lgnq2021@gmail.com; **Official Committee of Unsecured Creditors of PREPA**, jcasillas@cstlawpr.com; jnieves@cstlawpr.com; **Solar and Energy Storage Association of Puerto Rico**, Cfl@mcvpr.com; apc@mcvpr.com; javrua@sesapr.org; mrios@arroyorioslaw.com; ccordero@arroyorioslaw.com; **Wal-Mart Puerto Rico, Inc.**, Cfl@mcvpr.com; apc@mcvpr.com; **Solar United Neighbors**, ramonluisnieves@rlnlegal.com; **Mr. Victor González**, victorluisgonzalez@yahoo.com; and **the Energy Bureau's Consultants**, Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; jorge@maxetaenergy.com;

Moreover, LUMA hereby informs this Honorable Energy Bureau that Mr. Alejandro Figueroa was not able to appear before a public notary to execute a sworn attestation. Accordingly, LUMA will be filing duly notarized version of Mr. Alejandro Figueroa's surrebuttal testimony, on or before November 4, 2025.

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LUMA Exhibit 73
Surrebuttal Testimony of Mr. Alejandro Figueroa

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

IN RE:

PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: REVENUE DECOUPLING
MECHANISM

Surrebuttal Testimony of

Alejandro Figueroa-Ramírez

Chief Regulatory Officer, LUMA Energy ServCo, LLC

October 30, 2025

**Summary of Surrebuttal Testimony of
ALEJANDRO FIGUEROA
ON BEHALF OF
LUMA ENERGY LLC AND LUMA ENERGY SERVCO, LLC**

Mr. Alejandro Figueroa-Ramírez presents this Surrebuttal Testimony on behalf of LUMA Energy LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”). The purpose of Mr. Figueroa’s Surrebuttal Testimony is to address some issues and differences in opinion from portions of the answering testimonies of Mr. E. Kyle Datta on behalf of the Solar and Energy Storage Association of Puerto Rico (“SESA”) and the expert report of Ms. Melissa Whited of Synapse Energy Economics, Inc., a consultant to the Energy Bureau, filed on September 8, 2025, and October 6, 2025, respectively, in Case No. NEPR-AP-2023-0003, *In Re: Puerto Rico Electric Power Authority Rate Review*.

First, Mr. Figueroa refutes the conclusion made by Mr. Datta in his answering testimony that LUMA should not need to increase the fixed customer charge if a revenue decoupling mechanism is implemented. Mr. Figueroa clarifies that increasing the customer charge accomplishes a different objective than revenue decoupling and confirms that both are needed.

From there, Mr. Figueroa addresses the recommendations made by Ms. Whited in her reports. Mr. Figueroa responds to Ms. Whited’s recommendation that LUMA base the decoupling target revenue on the total utility revenue requirement across all customer classes. LUMA builds the target revenue based on revenues per class but agrees that the decoupling rate be calculated based upon a comparison of over or under collection of the total allowed revenues across all classes. As explained by Mr. Figueroa, Mr. Figueroa agrees with Ms. Whited’s recommendation that LUMA exclude variable costs, such as fuel and purchased power, from the decoupling formula because separate riders already reconcile those costs. Mr. Figueroa does not agree with Ms. Whited’s recommendation to implement *full decoupling* without weather normalization to improve transparency and reduce complexity because LUMA’s sales forecast incorporates weather-normalized sales units, so it is appropriate to compare weather normalized billed sales to ensure a true comparison. Mr. Figueroa also agrees with Ms. Whited’s recommendation that LUMA include sales lost due to outages in the decoupling calculation. PREB should address reliability and performance accountability through separate incentive mechanisms.

Mr. Figueroa agrees with Ms. Whited’s recommendation that the mechanism operate in both directions, with surcharges when revenues fall short of the authorized amount and refunds when revenues exceed it. Mr. Figueroa notes that LUMA’s proposal is the same as Ms. Whited’s recommendation to require annual decoupling adjustments to limit administrative burden and minimize rate volatility, while still providing timely revenue recovery. Mr. Figueroa indicates that LUMA also agrees with her recommendation to establish a soft cap on upward adjustments equal to 3 percent of annual revenues subject to the decoupling mechanism but takes the position that a similar cap should be placed on downward adjustments (refunds in the form of bill credits). To the extent that LUMA recovers beyond the 3 percent cap, Mr. Figueroa asserts that the utility should be able to reinvest the additional revenues. LUMA is not an investor-owned

utility, so the funds belong ultimately to the citizens of Puerto Rico. Any incremental funding available to support incremental projects, beyond those requested in the rate case, would inure to the benefit of electric customers. Mr. Figueroa also agrees with Ms. Whited's recommendation that LUMA implement the decoupling mechanism through a rider rather than through deferral accounting to promote timely, transparent reconciliation of decoupling revenues, support stable utility cash flow, and avoid large, accumulated balances of decoupling under or overcollections.

Finally, Mr. Figueroa agrees with Ms. Whited's recommendation that LUMA file a complete description of the decoupling mechanism before implementation, including formulas, inputs, data sources, and workpapers. Regarding annual updates, Mr. Figueroa recommends that the PREB treat the update to this rider similar to other periodic updates to riders. He also indicates that LUMA agrees with the PREB reviewing the decoupling mechanism during a future base rate case but suggests that the next rate case will occur prior to any actual experience with the rider and recommends that the review be conducted in a subsequent rate case when there have been some years of information as to how the rider operated.

I. BACKGROUND/INTRODUCTION

Q. 1 Please state your name, business address, title, and employer.

A. My name is Alejandro Figueroa Ramirez. My business address is LUMA Energy, PO Box 363508, San Juan, Puerto Rico 00936-3508. I am the Chief Regulatory Officer for LUMA Energy ServCo, LLC (“LUMA ServCo”).

Q. 2 On whose behalf are you submitting this Surrebuttal Testimony?

A. My surrebuttal testimony is provided on behalf of LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as “LUMA”).

Q. 3 What is the purpose of your surrebuttal testimony?

A. My testimony responds to several portions of the report of Melissa Whited of Synapse Energy Economics, Inc., a consultant to the Puerto Rico Energy Bureau (“PREB” or “Energy Bureau”), dated October 6, 2025.¹ The main purpose of my surrebuttal testimony is to respond to recommendations made by Ms. Whited regarding the proposed decoupling mechanism in her report. I also respond to the testimony of Mr. E. Kyle Datta (“Datta Testimony”) filed in this proceeding on September 8, 2025, on behalf of Solar & Energy Storage Association (“SESA”) to the extent it addresses LUMA’s decoupling mechanism.

Q. 4 Are there any exhibits attached to your testimony?

A. No.

Q. 5 What initiated the proposal for a revenue decoupling mechanism?

A. In my testimony, filed earlier in this rate review as LUMA Exhibit 1.0, I acknowledged the Energy Bureau’s February 27, 2025, resolution and order adding

¹ See PC Ex. 59.0 Expert Report of Melissa Whited.

two filing requirements that required “Schedule I,” a revenue decoupling mechanism with a proposed reconciliation.

Q. 6 Did LUMA provide this proposal?

A. Yes. LUMA witness Sam Shannon, in his testimony filed as LUMA Ex. 20.0, described a revenue decoupling mechanism, and how it could help protect the utility’s financial position in Puerto Rico in the face of energy efficiency programs and the high penetration of distributed generation. Witness Shannon stated that “pending approval from the Energy Bureau, a decoupling mechanism would commence in FY2028, reconciling FY2027.”² LUMA witness Andrew Smith also supported the development of a mechanism to “decouple” revenue from billing determinants. On August 19, 2025, the Energy Bureau issued a determination of completeness meaning that LUMA’s application, as filed and supplemented by responses to requests for information, is complete.

II. REVENUE DECOUPLING

Q. 7 What is LUMA’s objective of decoupling?

A. The objective of a revenue decoupling mechanism is to stabilize the Utility’s revenues and provide a hedge against revenue erosion. It does this by providing an annual true-up in the event that actual billed revenues are less than target revenues. If actual billed revenues exceed target revenues, the Energy Bureau could opt for these amounts to be returned to customers or to accrue to PREPA’s bank accounts that ultimately fund investment in the System as discussed in further detail below. I note that more investments into the System are required than what current funding levels

² LUMA Ex. 20.0, Sam Shannon’s Expert Testimony

45 provide. Therefore, any incremental revenue that is redirected to fund incremental
46 investments beyond those initially projected will result in a benefit to customers.

47 **Q.8 Does a revenue decoupling mechanism reduce the need for LUMA to increase**
48 **its fixed charges?**

49 A. No. Revenue decoupling and the revenue allocation based on the results of Mr.
50 Shannon's Cost-of-Service Study (COSS") are two separate and distinct things. The
51 purpose of a revenue decoupling mechanism is to permit a surcharge to recover the
52 full revenue authorized by the Energy Bureau without the need for a full rate case to
53 reset rates. The purpose of a COSS is to allocate a utility's embedded costs to its
54 various customer classes based on cost causation and cost allocation principles.
55 Therefore, in its intervener answering testimony, SESA's witness Mr. Datta
56 mischaracterized the impact of the revenue decoupling mechanism in that he asserted
57 that such mechanism would provide the utility with sufficient revenue stability such
58 that an increase to the fixed charges is not warranted.

59 **Q.9 Does a revenue decoupling mechanism solve revenue erosion due to distributed**
60 **generation?**

61 A. No. As I stated in the September 4th Technical Conference, revenue decoupling can
62 provide a useful bridge while broader policy decisions around solar energy are being
63 studied.³ LUMA acknowledges and agrees that this rate review is not intended to set
64 solar policy.

65 **Q.10 The PREB consultant's report recommends that LUMA base the decoupling**
66 **revenue target on the utility's revenue requirement across all customer classes**

³ <https://www.youtube.com/watch?v=Tujq4QtJS6c>, 1:32:28

67 **with annual adjustments. How does LUMA propose the target revenues be**
68 **established?**

69 A. LUMA agrees with the recommendation for an annual decoupling mechanism with a
70 decoupling rate based on the utility's total revenue requirement. LUMA proposes
71 that in present and future rates cases, the Energy Bureau establish authorized
72 revenue requirements for the test years, and that the target revenue would be a
73 function of the authorized revenue requirement. LUMA proposes that target revenue
74 for the purposes of a revenue decoupling mechanism be identified as a revenue per
75 customer number for each customer class. In other words, the authorized revenue
76 allocation for each participating customer class would be translated into a revenue
77 per customer number. The target revenue number(s) would set the basis for
78 comparing actual billed revenue to authorized revenue to determine the annual
79 surcharge (if any). However, the decoupling rate calculation would be based on the
80 total variance in revenue for all classes.

81 **Q.11 The PREB consultant report recommends that the target revenue exclude**
82 **variable costs, such as fuel and purchased power, from the decoupling formula**
83 **because separate riders already reconcile those costs. Does LUMA propose that**
84 **the target revenue per customer include fuel and purchased power revenue?**

85 A. No, it would only be calculated to include the base rates. Riders such as FCA,
86 PPCA, CILT, and SUBA are pass-through riders that collect funds to match specific
87 expenses. Their formulas for these riders already include a prior period
88 reconciliation, which accomplishes the same objective as a revenue decoupling
89 mechanism.

90 **Q.12 Which customer classes will participate in the decoupling mechanism?**

91 A. As a starting point, all non-lighting customer classes except the subsidized rates
92 would participate in the decoupling mechanism i.e., GRS, GSS, GSP, TOU-P, GST,
93 and TOU-T. Target revenues would be developed for each of the participating
94 customer classes and the decoupling charges would only apply to these classes. This
95 approach would be consistent with prior determinations by the Energy Bureau,
96 including the July 31, 2025 Provisional Rate Order.

97 **Q.13 Under the proposal, would each participating customer class be reviewed in**
98 **isolation, or as a total population?**

99 A. Both the participating customer class and the total population for all the classes
100 would be considered. Each customer class would be evaluated based on its variance
101 from the target revenue number. However, the decoupling rate calculation would be
102 based on the total variance. If, for example, the GRS customer class falls short of its
103 target revenue, but the utility's total revenue reaches or exceeds the authorized
104 revenue requirement, then there would be no surcharge to any customer class.
105 However, if there is a total revenue shortfall, then the surcharge would apply to all
106 classes subject to decoupling.

107 **Q.14 If the decoupling mechanism fundamentally operates based on the total**
108 **variance, why use class-specific revenues as the basis for targets?**

109 A, Using class-specific revenue targets protects both customers and the utility. First, it
110 accounts for customer growth within a customer class, or conversely, the loss of
111 customers. Second, class-specific revenue targets reflect the fact that some customer
112 classes have vastly greater revenues per customer than others. For these classes, a
113 handful of individual customers can swing the actual billed revenue numbers.
114 Keeping these classes separate from mass classes, like GRS or GSS, provides more

115 transparency in the reporting of the decoupling mechanism and gives a clearer
116 picture of the utility's sales.

117 **Q.15 The PREB Expert Reports proposed to recover or refund any under or over**
118 **collected revenues to customers using a rider mechanism instead of deferral**
119 **accounting. What is LUMA's opinion?**

120 A. LUMA agrees with the recommendation to recover decoupling adjustments through
121 a separate rider. Any variance from forecast revenue would be recovered via the
122 decoupling rider annually. Separately from the revenue decoupling mechanism, in
123 the surrebuttal testimony on costs due November 3, LUMA will discuss the use of
124 deferral accounting to facilitate the rolling over of any accumulated variance in the
125 bad debt provision (i.e., between the amount that is forecast and what the actual bad
126 debt amount is) into the revenue requirement for the next rate case.

127 **Q.16 How frequently would the decoupling mechanism operate?**

128 A. LUMA agrees with the PREB consultants that the mechanism should operate on an
129 annual basis. Similar to how the other riders operate, LUMA will submit, in this
130 case, an annual filing with the Energy Bureau in May, two months before the end of
131 the fiscal year with ten months of actuals and two months of forecast. The
132 decoupling mechanism surcharge (if any) would be in effect for the entire following
133 fiscal year.

134 **Q.17 Why would the decoupling mechanism not operate more frequently than**
135 **annually?**

136 A. LUMA agrees with the PREB consultants that an annual reconciliation strikes the
137 right balance between reducing administrative burden and reducing bill volatility
138 while still providing timely revenue recovery. Because authorized revenue

requirements are set for test years, the target revenue and decoupling mechanism should match that time period. Also, attempting to define actual revenue versus target revenue for part of the test year may be complicated by the seasonality of electricity sales. Having an annual reconciliation for decoupling avoids this issue. It also allows the utility to smooth the surcharge (if any) and thereby reduce the rate impact, again noting the Hearing Examiner's comments on the presence of a decoupling mechanism versus customers' ability to pay.

Q.18 The PREB Expert Report recommends full decoupling without weather normalization. What is LUMA's opinion? Should the actual revenue be weather normalized prior to comparison with target revenues?

A. Yes. The decoupling mechanism should account for weather normalization. This is necessary because the sales forecast incorporates weather-normalized sales units adjusted for cooling degree days, and so the actual revenues for a fiscal year would be adjusted to remove the effect of deviations due to weather. Because the sales forecast already uses weather-normalized sales, the authorized target revenues will be a weather-normalized number. Evaluating the target against the weather-normalized actual billed sales ensures a true apples-to-apples comparison.

Q.19 The PREB Expert Report recommends that LUMA include outages in the decoupling calculation. Should the decoupling mechanism incorporate revenue reduction due to storm outages?

A. Yes. LUMA's sales forecast does not account for storm outages therefore, to the extent that storm outages reduce PREPA's revenues, these losses would be captured by the decoupling mechanism. As Ms. Whited explains, "excluding outage-related sales would deprive the utility of necessary revenues for maintenance and

investment, which would ultimately harm customers by undermining system reliability.”⁴ LUMA agrees with this statement. The purpose of a decoupling mechanism is to provide a tool for the utility to gain stability and predictability in revenues such that it can continue to invest in the system at the levels necessary to maintain and improve service quality levels. Not accounting for storm-related outages defeats the purpose as the overall needs of the utility will remain the same, while the revenues would fall short of those required to meet those needs.

Q.20 Would the decoupling mechanism incorporate revenue reduction due to transmission, distribution or generation outages?

A. Yes. As I describe above, depriving the utility of revenues undermines reliability by creating a situation in which the utility does not have the funds to invest in the system. LUMA agrees with Ms. Whited’s conclusion that this is why performance incentives should be addressed separately.

Q.21 How would the decoupling mechanism apply to customers?

A. The decoupling rate would be a monthly volumetric charge applied to all the participating customer classes. The allocation of the decoupling recovery amount would be based on the forecast energy sales for the following fiscal year. The Utility requests the Energy Bureau establish a Decoupling Rider with an initial rate of zero in the event that the Energy Bureau approves a decoupling mechanism.

Q.22 When would the decoupling mechanism begin?

A. If approved by the Energy Bureau in its final Order in February, March or April of 2026, then the decoupling mechanism would begin in FY2027, with the first

⁴ See PC Ex. 59.0 Expert Report of Melissa Whited.

185 potential decoupling surcharge (if any) going into effect for beginning of fiscal year
186 2028, to reconcile revenues from FY2027.

187 **Q.23 Will the decoupling mechanism take into account effects of energy efficiency**
188 **activities?**

189 A. No. The sales forecast prepared by Ms. Joseline Estrada for LUMA already contains
190 modifiers for energy efficiency impacts. Therefore, the potential impact has already
191 been incorporated into rates.

192 **Q.24 The PREB Expert Report proposes a one-way cap of 3% on the decoupling**
193 **mechanism. Do you have any comments on that cap?**

194 A. Yes. Any cap should be bidirectional such that the utility has a reasonable
195 opportunity to both collect and credit customers as needed. To the extent that there is
196 an overcollection, then a cap would provide an opportunity for a portion of the
197 overcollection to be reinvested into the system to support incremental investments
198 that may be urgently required or otherwise provide incremental benefits to
199 customers. In the event that PREPA gains access to capital markets in the future,
200 then the proposed cap on credits for overcollection can be reassessed.

201 **Q. 25 Do you have comments on the PREB Expert Report's recommendations filing**
202 **description, workpapers, etc. and regarding stakeholder review?**

203 A. Yes. The Energy Bureau should conduct this review in the same manner in which it
204 reviews all other periodic rate adjustments such as FCA, PPCA, and the other riders.

205 **Q. 26 Do you have a response to the recommendation that the pilot program be**
206 **evaluated in next rate case?**

207 A. Yes. LUMA suggests that the next rate case may be premature to evaluate this
208 mechanism. The first year that the revenue decoupling mechanism will be in place is

209 FY2028, to true up revenues for FY2027. Therefore, assuming the following rate
210 case occurs sometime around FY2028, it is unlikely that there will be enough
211 information available regarding the application and implementation of the
212 decoupling mechanism to support any modifications. Accordingly, LUMA proposes
213 that any assessment of the decoupling mechanism be performed after such
214 mechanism has been in place for at least more than one fiscal year.

215 **Q. 27 The PREB Expert Reports noted that LUMA stated in response to a request for**
216 **information that the cost of implementing the decoupling mechanism is not in**
217 **the rate case, do you plan to address that cost?**

218 A. Yes. LUMA will address this in its surrebuttal on costs to be filed November 3rd.

219 **Q.28 Does this conclude your testimony?**

220 A. Yes.