

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

NEPR

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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO. NEPR-MI-2022-0001

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

**MOTION TO SUBMIT NOVEMBER 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

With this motion, LUMA is submitting to the Puerto Rico Energy Bureau (“Energy Bureau”) the monthly report on the Pilot Emergency Backup Generators Demand Response Program covering the activities during the month of October 2025. This program was developed 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.

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 May 21, 2025, LUMA filed with the Energy Bureau its proposal for the Emergency Load Reduction Program.²

3. 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 Emergency Load Reduction Program, among others.³ The Energy Bureau also directed LUMA to continue filing the monthly reports on the status of the program.⁴

III. Submittal of Report on Emergency Load Reduction Program

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

5. As per the October 23rd Order, the Energy Bureau ordered LUMA to file a proposed backup generators emergency response program to be implemented by June 2025. The Energy Bureau also required LUMA to submit monthly reports on or before the 15th of each month, beginning January 15, 2025, detailing its efforts to implement the program. Despite these

¹ See October 23rd Order, pp. 4-5.

² See *Motion to Submit Proposal for Emergency Load Reduction Program in Compliance with Resolution and Order of April 30, 2025*

³ See June 20th Order, p. 3.

⁴ See *id.*

efforts, the Emergency Load Reduction Program was not deployed during Summer 2025, as implementation barriers –detailed in LUMA’s Monthly Reports– prevented its launch.

6. LUMA continues to work toward the successful deployment of the Emergency Load Reduction Program, with the goal of launching the program in Summer 2026, subject to resource adequacy and the determination of the Energy Bureau at that time. Given that the original milestone for implementation by June 2025 could not be met, and that the purpose of the monthly reports to monitor progress toward that milestone has been fulfilled, LUMA respectfully requests that the Energy Bureau release LUMA from the requirements to file further reports. Moreover, LUMA requests that this November report be considered the final report in compliance with the October 23rd Order and the June 20th Order.

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the aforementioned and accept the Report included in *Exhibit 1* as the final Monthly Report 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 and release LUMA from the requirement to submit further Emergency Load Reduction Monthly Reports.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of November 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 to hrivera@jrsp.pr.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; javruea@sesapr.org; mrrios@arroyorioslaw.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; pjcleanenergy@gmail.com; agraitfe@agraitlawpr.com; info@sesapr.org; cfl@mcvpr.com; mqs@mcvpr.com.



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Exhibit 1

Demand Response: Emergency Load Reduction Program Monthly Report



Demand Response: Emergency Load Reduction Program Monthly Report

NEPR-MI-2022-0001

November 17, 2025

Emergency Load Reduction Program (ELRP) Monthly Report

Key Activity Summary
During the month of October, the following activities were carried out in relation to the ELRP program: - LUMA held a meeting with a member of the Pharmaceutical Industry Association (PIA) where LUMA provided updates on the ELRP program, including the status of discussions with EPA regarding No Action Assurance. - Following a prior meeting with representatives from the U.S. Environmental Protection Agency (EPA), it was identified that multiple submissions related to the same request for Non-Action Assurance were active in that agency. As a result, LUMA has been coordinating communications with the other agencies involved to align efforts to facilitate a resolution of the matter before the EPA.
Risk / Issues:
Due to ongoing uncertainty regarding the number of participants who will ultimately enroll, a specific budget forecast for approval is not available at this time. The ELRP program was not deployed during Summer 2025, as implementation barriers outlined by LUMA in its Monthly Reports prevented its launch.

Key Milestones	Date	Status
Continued alignment with internal departments for the re-launch of the ELRP program.	Completed	G
Refine and revise ELRP 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 agreement signed.	Completed	G
Program ready for events.	Off Plan	O

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



**People First.
Safety Always.**

LUMA 