

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

NEPR

Received:

Dec 18, 2025

5:38 PM

IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Motion to Submit LUMA's Responses
to Requirements of Information in Compliance with
Resolution and Order of December 11, 2025

**MOTION TO SUBMIT LUMA'S RESPONSES TO REQUIREMENTS OF
INFORMATION IN COMPLIANCE WITH RESOLUTION AND ORDER OF
DECEMBER 11, 2025**

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 November 14, 2025, LUMA filed its Consolidated TPP and DR Administrative Costs Quarterly Report¹ ("Q1 FY26 Report") for the first quarter of ("Q1") Fiscal Year ("FY") 2026. *See Motion to Submit FY26 Q1 Consolidated Transition Period Plan and Demand Response Administrative Cost Quarterly Report* ("November 14th Motion"). In the November 14th Motion, LUMA noted that:

During Q1 of FY 2026, LUMA's operations continued to face severe underfunding, a challenge that began in the prior fiscal year and stemmed from a persistent structural funding gap. Although the Energy Bureau approved budgets to support reliable operations, actual cash transfers from PREPA have consistently fallen

¹ This is a quarterly report filed in connection with the Amended Transition Period Plan ("TPP") filed by LUMA on July 22, 2025, and approved by the Energy Bureau by Resolution and Order issued on August 19, 2025. The quarterly reporting requirement arises from Resolutions and Order of the Energy Bureau issued on February 16, 2023, August 29, 2023, and March 21, 2024.

short, covering less than 33% of required balances since August 2024. By the end of Q1 FY2026, LUMA had received only \$142 million, or 77% of the approved budget for that period. This ongoing shortfall has forced LUMA to triage its efforts, focusing limited resources on the most critical activities to safeguard the reliability and stability of the electric grid.

Id., p. 8.

2. On December 11, 2025, the Energy Bureau issued a Resolution and Order (“December 11th Resolution and Order”) in which it highlighted the language in the November 14th Motion quoted above, as well information in the Q1 FY26 Report regarding the resulting pause of certain EE programs. *See December 11th Resolution and Order, pp. 2-3.* Then, among others², the Energy Bureau directed LUMA and PREPA to respond to the following requirements of information included in the December 11th Resolution and Order (“December 11th ROIs”) no later than five (5) business days from the issuance of the Resolution and Order.

1. How much revenue was collected from customers through the EE Rider in Q1 of FY2026?
2. How much revenue is expected to be collected from customers through the EE Rider in each remaining quarter of FY2026?
3. Detail the system used to identify and keep separate EE Rider funds when the funds arrive in the organization's financial system.
4. Has PREPA transferred all collected EE Rider funds to LUMA (including all past and present fiscal year funds)? If not, why not? Where are those funds today?
5. Has LUMA allocated all EE Rider funds it has received to the implementation of EE programs? If not, why not? How have EE Rider funds been allocated if not to EE programs?

Id., p. 4.

² The Energy Bureau also issued directives to PREPA regarding the prompt transfer of collected EE Rider funds to LUMA for use in EE program implementation, and to LUMA regarding the allocation of collected EE Rider funds, reopening of paused EE programs, and future reporting of cash constraints impacting the EE programs. *See id.*, p. 3.

3. In compliance with the December 11th Resolution and Order, LUMA submits herein as *Exhibit 1* LUMA's responses to the December 11th ROIs.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** LUMA's responses to the December 11th ROIs in *Exhibit 1* in compliance with the December 11th Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of December 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 hrivera@jrsp.pr.gov nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; javrua@sesapr.org; mrios@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.



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
Responses to December 11th ROIs

Responses to December 11 ROIs regarding Energy Efficiency Rider and Cash Constraints

NEPR-MI-2022-0001

December 18, 2025

Evaluation Demand Response Energy Efficiency TPP

NEPR-MI-2022-0001

Response: ROI-LUMA-MI-2022-0001-20251211-PREB-#001

REQUEST

1. How much revenue was collected from customers through the EE Rider in Q1 of FY2026?

RESPONSE

During the first quarter of Fiscal Year 2026, a total of \$3,562,168 was billed under the Energy Efficiency (EE) rider.

The data presented pertains to billed, not collected, amounts. It is important to distinguish between the two: billed amounts represent the charges issued to customers based on their monthly energy consumption, while collected amounts reflect the actual payments received from customers. Payments (reflected as collections) made by customers are applied to the total billed amount without prioritization or allocation among the specific components of the invoice.

Evaluation Demand Response Energy Efficiency TPP

NEPR-MI-2022-0001

Response: ROI-LUMA-MI-2022-0001-20251211-PREB #002

REQUEST

2. How much revenue is expected to be collected from customers through the EE Rider in each remaining quarter of FY2026?

RESPONSE

The data presented below reflects billed amounts, as explained in response to request of information (ROI) 1. LUMA's forecasting is based on billed charges rather than collected amounts. This distinction is critical for accurate data interpretation, as the figures represent billed amounts and not collections received from customers.

A total of \$3,458,802 was billed in October and November. Based on LUMA's consumption forecast for Fiscal Year 2026, the estimated billing for the period from December through June is \$7,573,711. This brings the total estimated billed amount under the EE rider for the remaining months of FY 2026 to \$11,032,513.

Table 1: Breakdown of Amounts Expected to Collected

Period	EE Rider \$
Q2*	\$4,551,445
Q3	\$3,011,396
Q4	\$3,469,672
Total	\$11,032,513

*Q2: October and November are actual.

Evaluation Demand Response Energy Efficiency TPP

NEPR-MI-2022-0001

Response: ROI-LUMA-MI-2022-0001-20251211-PREB-#003

REQUEST

3. Detail the system used to identify and keep separate EE Rider funds when the funds arrive in the organization's financial system.

RESPONSE

Currently, there is no financial system implemented to identify and separately track EE Rider funds when they are received. The CC&B system keeps track of the EE rider billed but the system does not have the capability to assign collections to the basic rate or rider. The transfers to the Energy Efficiency program have been made through specific requests to Puerto Rico Electric Power Authority (PREPA). There has never been a transfer of funds based on the Rider's monthly collections.

Table 2: Source of Funds for Energy Efficiency Program

Period	Amount	Description
FY-24 2024-03-19	\$810,000.00	LUMA's Operating ACC
FY-24 2024-04-05	\$1,994,395.50	LUMA's Operating ACC
FY-24 2024-05-08	\$690,292.50	LUMA's Operating ACC
FY-25 2024-07-17	\$2,539,688.00	LUMA's Operating ACC
	\$6,034,376.00	

Period	Amount	Description
FY-25 2024 10-24	\$3,822,344.00	From EE Rider Collections
FY-25 2025 03-27	\$3,272,344.00	From EE Rider Collections
FY-25 2025 07-28	\$1,196,312.98	From EE Rider Collections
FY-25 2025 09-26	\$500,000.00	From EE Rider Collections
	\$8,791,000.98	

Evaluation Demand Response Energy Efficiency TPP

NEPR-MI-2022-0001

Response: ROI-LUMA-MI-2022-0001-20251211-PREB-#004

REQUEST

4. Has PREPA transferred all collected EE Rider funds to LUMA (including all past and present fiscal year funds)? If not, why not? Where are those funds today?

RESPONSE

PREPA has not transferred all collected EE Rider funds to LUMA. LUMA has only received \$8.791 million from PREPA for the EE program to date. The total program expenditures from FY24 through FY26 (July–November) amount to \$23.850 million.

The breakdown of expenses is as follows:

FY24 – \$5.718 million

FY25 – \$15.770 million

FY26 (Jul–Nov) – \$2.361 million

At this time, LUMA has not received the full amount of EE Rider funds collected by PREPA. Having information from PREPA's billed EE rider amounts will provide essential information to provide transparency and proper alignment with the program's financial requirements.

To that end, LUMA has provided PREPA with all the necessary information regarding the program on multiple occasions, both via email and phone, to facilitate the approval of the fund transfer. LUMA representatives also met in person with each of the three PREPA CFOs to explain the program's funding needs.

Evaluation Demand Response Energy Efficiency TPP

NEPR-MI-2022-0001

Response: ROI-LUMA-MI-2022-0001-20251211-PREB-#005

REQUEST

5. Has LUMA allocated all EE Rider funds it has received to the implementation of EE programs? If not, why not? How have EE Rider funds been allocated if not to EE programs?

RESPONSE

Yes. LUMA has been actively implementing EE programs and allocating all EE Rider funds it has received to the implementation of such programs. As part of managing this program, documentation on expenditures is kept and analyzed, including invoices and documentation for inventory purchased (i.e. kits), administered programs (i.e. rebates) among others. Details related to the implementation of EE programs are provided to the Energy Bureau in docket NEPR-MI-2022-0001.