NEPR

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GOVERNMENT OF 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: **Motion Submitting Revised Revenue Requirement**

MOTION SUBMITTING REVISED REVENUE REQUIREMENT

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 referred to as "LUMA"), and respectfully state and request the following:

1. On July 3, 2025, LUMA filed a *Motion Submitting Rate Review Petition* ("Rate Review Petition") with this Honorable Puerto Rico Energy Bureau ("Energy Bureau"), on behalf of Genera PR, LLC ("Genera") and the Puerto Rico Electric Power Authority ("PREPA"), thereby formally initiating the captioned adjudicative proceeding aimed at establishing new electric power service rates.

2. The Rate Review Petition was accompanied by prefiled testimonies, workpapers containing analyses, facts, calculations, and supporting schedules. In what is pertinent to the present filing, LUMA submitted schedules containing the system-wide revenue requirement, in compliance with the directives set forth by this Energy Bureau and its Hearing Examiner, Scott Hempling.

3. Pursuant to the agenda established by the Hearing Examiner, evidentiary hearings in the captioned proceeding were held between November 12, 2025, and December 19, 2025.

During said hearings, the Hearing Examiner directed LUMA to file a revised and updated version of the system-wide revenue requirement, containing the relevant adjustments to the revenue requirement for each of LUMA, PREPA, and Genera for each fiscal year in the rate period.

4. In compliance with the above, LUMA hereby submits a revised and updated version of all of the System's revenue requirement schedules with the updated Optimal and Constrained Revenue Requirements for LUMA and PREPA and the prior Optimal and Constrained Revenue Requirements for Genera. *See Annex 1-Updated Revenue Requirement Schedules*.

5. Moreover, for the benefit of all stakeholders, LUMA also includes a document titled Exhibit 1, which itemizes all differences between both the Optimal and Constrained revenue requirements as filed on July 3rd, and the updated revenue requirement filed herewith. *See Annex 2-Itemization of changes to the revenue requirement made since July 3rd Rate Review Petition*.

6. It is LUMA's understanding that although Genera is including the Optimal and Constrained Revenue Requirements that it previously proposed to be considered by the Energy Bureau, it is proposing a final hybrid as its Revenue Requirement. LUMA included a revised Schedule B-1 that shows the revenue requirement with Genera's hybrid Revenue Requirement included as *Annex 3-Updated Revenue Requirement -Updated Schedule B-1 with Genera's Hybrid/Constrained, Annex 4-General Information on Changes to General Filing Schedules by Department/Section*, and *Annex 5-Changes on Genera Filing Schedules*. LUMA's understanding is that Genera will file its own motion to explain in more detail the revisions to its prior revenue requirements incorporated in the hybrid proposal.

WHEREFORE, LUMA respectfully requests that the Energy Bureau and all other stakeholders **take notice** of the above.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of January, 2026.

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 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; rafael@maxetaenergy.com; RSmithLA@aol.com; msdady@gmail.com; mcranston29@gmail.com; dawn.bisdorf@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; guy@maxetaenergy.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com; carl.pechman@keylogic.com; bernard.neenan@keylogic.com; tara.hamilton@ethree.com; aryeh.goldparker@ethree.com; roger@maxetaenergy.com; Shadi@acciongroup.com; Gerard.Gil@ankura.com; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; gerardo_cosme@solartekpr.net; jrinconlopez@guidehouse.com; kara.smith@weil.com; varoon.sachdev@whitecase.com; zack.schrieber@cwt.com; Isaac.Stevens@dechert.com; James.Moser@dechert.com; Kayla.Yoon@dechert.com; juan@londoneconomics.com; arrivera@nuenergypr.com; ahopkins@synapse-energy.com.

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Annex 1

Updated Revenue Requirement Schedules

[Excel Spreadsheet filed separately]

Annex 2

Itemization of changes to the revenue requirement made since July 3rd Rate Review Petition

Update to Revenue Requirement

NEPR-AP-2023-0003

This update identifies the revenue requirement and itemizes any changes made since the July 3 rate review petition.

Table 2-1, below, lists the reconciling items that constitute the difference between the Optimal Budget revenue requirement as filed on July 3rd, and the updated revenue requirement filed on December 12. In the case of Genera, it only identifies changes made up to October 31, 2025.

Table 2-1. Optimal Budget – Updates to July 3rd Filing

Description	FY2026 ($)	FY2027 ($)	FY2028 ($)	Notes
July 3 Revenue Requirement	2,968,354,083	3,250,398,366	3,505,523,002	Base rate funded portion only, including cost share match and margin
PREPA Placeholder	(87,760,970)	(111,127,677)	(117,367,377)	July 3rd filing included a placeholder for PREPA. This placeholder is backed out and replaced with the next two line items in this table.
PREPA Revenue Requirement	91,870,573	81,357,353	79,009,017	See PC-of-LUMA-FIN-3
PREPA Cost Share Match	9,110,265	812,609	-	See PC-of-LIMA-FIN-3
Genera Addition	1,000,000	1,000,000	1,000,000	See PC-of-LUMA-FIN-3
Genera – reduction in cost share match (10/31 filing)	($67,403,088)	($34,288,639)	($8,502,694)	See PC-of-LUMA-FIN-3
Genera – reduction in NFC (10/31 filing)	($56,400,000)	($16,600,000)	($20,820,400)	See PC-of-LUMA-FIN-3
LUMA Adjustments – Update #1	(150,000)	-	-	See Table 2-3, *LUMA's Updates to RR* tab of revenue requirement
LUMA Adjustments – Update #2	(3,000,000)	(3,000,000)	(3,000,000)	See Table 2-4, *LUMA's Updates to RR* tab of Revenue Requirement Schedules
LUMA Adjustments – Update #3	660,000	(11,310,697)	(16,299,595)	See Table 2-5, *LUMA's Updates to RR* tab of Revenue Requirement Schedules

Update Bad Debt[1]	13,137,288	12,178,350	14,505,369	Update to 2.97% of current total system revenue requirement
FOMB Advisory	18,324,982	5,866,071	9,197,272	
LUMA Interim	8,750,000	6,562,500	4,375,000	
December 12 Revenue Requirement	**2,896,493,133**	**3,181,848,236**	**3,447,619,594**	

Table 2-2 below lists the reconciling items that constitute the difference between the Constrained Budget revenue requirement filed on July 3rd and the updated revenue requirement filed on December 19.

Table 2-2. Constrained Budget – Reconciliation to July 3rd Filing

Description	FY2026 ($)	FY2027 ($)	FY2028 ($)	Notes
July 3rd Total	2,355,964,146	2,535,426,554	2,601,663,817	Base rate funded portion only, including cost share match and margin
PREPA Placeholder	(78,470,749)	(79,876,521)	(83,459,839)	Reverse PREPA placeholder amounts
PREPA Revenue Requirement	91,870,573	81,357,353	79,009,017	See PC-of-LUMA-FIN-3
PREPA Cost Share Match	9,110,265	812,609	-	See PC-of-LUMA-FIN-3
Genera Addition	1,000,000	1,000,000	1,000,000	See PC-of-LUMA-FIN-3
Genera – reduction in cost share match (10/31 filing)	($67,403,088)	($34,288,639)	($8,502,694)	See PC-of-LUMA-FIN-3
Genera – reduction in NFC (10/31 filing)	($50,330,000)	($14,205,000)	($19,248,892)	See PC-of-LUMA-FIN-3
LUMA Adjustments – Update #1	(100,000)	(165,935)	(172,575)	See Table 2-3, *LUMA's Updates to RR* tab of revenue requirement
LUMA Adjustments – Update #2	-	1,000,512	1,093,106	See Table 2-4, *LUMA's Updates to RR* tab of Revenue Requirement Schedules
LUMA Adjustments – Update #3	2,145,391	(9,818,036)	(14,799,301)	See Table 2-5, *LUMA's Updates to RR* tab of Revenue Requirement Schedules
Correct Bad Debt	25,401,134	30,384,026	35,842,473	Correct to 2.97% of current total system revenue requirement
FOMB Advisory	18,324,982	5,866,071	9,197,272	

[1] Note that this number has not been adjusted since the July 3rd filing. This update corrects errors present in the initial calculation, and reflects any changes to the overall total system revenue requirement (including fuel and purchased power) as documented in this response. This total reflects 2.97%.

LUMA Interim	8,750,000	6,562,500	4,375,000	
Updated Revenue Requirement	**2,316,262,654**	**2,523,997,473**	**2,606,079,690**	

During the week of December 15 – 19, 2025, LUMA made several attempts to seek corrections from PREPA and Genera. On December 22, 2025, Genera sent to LUMA its Final Revenue Requirement. The update and details of Genera's revenue requirement are reflected in Annexes 3-5.

Attestation

I, Alejandro Figueroa, state that the information contained in this response is complete, true, and accurate to the best of my knowledge and belief.

/s/ Alejandro Figueroa

Annex 3

Updated Revenue Requirement -Updated Schedule B-1 with Genera's Hybrid/Constrained

[Excel Spreadsheet filed separately]

Annex 4

General Information on Changes to General Filing Schedules by Department/Section

Changes to Genera Filing Schedules by Department / Section

Department / Section	Optimal	Constrained	Other	Comments
Labor Expense			X	FY2026: Constrained budget FY2027–FY2028: Constrained budget + $20M annually for union labor expense mitigation
Corporate Affairs		X		
Fuel		X		
IT/OT		X		
HR	X			
Safety		X		
Regulatory		X		
Environmental	X			
Legal	X			
Insurance		X		
Procurement	X			
Finance	X			
Security		X		
Emergency Response	X			
Projects		X		
Corp Office		X		
Fleet		X		
Asset Management		X		
Warehouse			X	FY26–FY28: Constrained budget less $7.2M obsolete materials adjustment in FY26
Operations	X			
GenCo Reserve Account				FY26-FY28: $30M for the Reserve Account
Genera Fixed Fee		X		
Maintenance Projects			X	FY26–FY28: Constrained budget less $1.5M BESS O&M in FY26 and decommissioning projects
Federal Funding Cast Share (Rotating)			X	Included $30M as a rotatory facility in FY26

Annex 5

Changes on Genera Filing Schedules

[Excel Spreadsheet filed separately]