

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

NEPR

Received:

Jan 15, 2026

4:55 PM

IN RE: REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

CASE NO.: NEPR-AP-2023-0004

SUBJECT: Motion Submitting Supplemental Responses to the First Set of 2025 IRP Post Filing Request for Information in Compliance with Resolution and Order of December 3, 2025, Request for Confidential Treatment, and Memorandum in Support of Confidentiality

**MOTION SUBMITTING SUPPLEMENTAL RESPONSES TO THE FIRST SET OF 2025
IRP POST FILING REQUEST FOR INFORMATION IN COMPLIANCE WITH
RESOLUTION AND ORDER OF DECEMBER 3, 2025, REQUEST FOR
CONFIDENTIAL TREATMENT, AND MEMORANDUM IN SUPPORT OF
CONFIDENTIALITY**

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:

I. Introduction and Submission of Supplemental Responses

1. On October 17, 2025, LUMA filed a *Motion Submitting 2025 IRP and Request for Confidential Treatment*. Therein, LUMA submitted the 2025 IRP recommending that the Puerto Rico Energy Bureau (“Energy Bureau”) approve Resource Plan Hybrid A as LUMA’s Preferred Resource Plan (PRP). In compliance with the May 13th Order, LUMA filed the 2025 IRP Report, along with the workpapers and models relied on in developing it.

2. On October 29, 2025, LUMA filed a *Memorandum of Law in Support of Request for Confidential Treatment of Revised 2025 IRP and Submission of Public Version and Confidential Version of Revised 2025 IRP*. LUMA submitted a revised, redacted version of the

2025 IRP Report, along with the workpapers and models relied on in developing the 2025 IRP Report, for public disclosure.¹ Moreover, pursuant to the Energy Bureau’s Policy on Confidential Information, LUMA filed the corresponding memorandum of law stating the legal basis for the request to treat certain portions of the revised version of the 2025 IRP and the workpapers and models relied on in developing the 2025 IRP confidentially.

3. Thereafter, on November 21, 2025, LUMA filed a *Motion Submitting the Transmission Needs Studies Report, Request for Confidential Treatment, and Memorandum in Support of Confidentiality*. LUMA submitted the Transmission Needs Studies Report in compliance with the portion of Regulation 9021 that requires LUMA to test the PRP to determine any implications it may have on the transmission and distribution system. It also filed a revised version of the pre-filed direct testimony of Dr. Ajit Kulkarni, Grid Modernization Manager, in support of the Transmission Needs Studies Report.

4. On December 3, 2025, the Energy Bureau issued a Resolution and Order directing LUMA to respond to the *First Set of 2025 IRP Post Filing Request For Information* within fifteen (15) business days of the notice of the Resolution and Order (“December 3rd Order”). The *First Set of 2025 IRP Post Filing Request For Information* addresses 2025 IRP completeness, including the need for LUMA to provide further clarity on some aspects of the 2025 IRP Report and to provide further explanation and workpapers in support of the material filed.

5. On December 22, 2025, LUMA filed a *Motion Submitting Responses to the First Set of 2025 IRP Post Filing Request of Information in Compliance with Resolution and Order of December 3, 2025*. Therein, LUMA submitted narrative responses to all questions, except those

¹ The revised version differed from the version filed on October 17, 2025, in that it addressed some grammatical errors and formatting issues, and revised the data presented in Tables 66, 67, and 68, specifically the values in the second column labeled “PR100 Cost Scaling Factor.” It also revisited some of the confidential designations originally made.

that required the data referenced in question four of the *First Set of 2025 IRP Post Filing Request For Information*. LUMA requested an extension to submit no later than January 15, 2026, the hourly data requested in question four of the *First Set of 2025 IRP Post Filing Request For Information*, along with detailed responses to questions 4b, 4c, 4d, and 8d, which are directly related to that data.

6. On December 23, 2025, the Energy Bureau issued a Resolution and Order granting LUMA until January 15, 2026, to submit the hourly data of all Scenarios along with detailed responses to questions 4b, 4c, 4d, and 8d, which are directly related to that data.

7. In further compliance with the December 3rd Order, LUMA hereby submits as *Exhibit 1* detailed responses to questions 4b, 4c, 4d, and 8d of the *First Set of 2025 IRP Post Filing Request For Information*, along with the hourly data requested in question four as *Exhibit 2*.

8. LUMA respectfully submits that *Exhibit 2* contains confidential information that garners protection from public disclosure pursuant to applicable law and regulations, as will be expounded upon below. Accordingly, pursuant to this Energy Bureau's Policy on Confidential Information, LUMA hereby submits the corresponding memorandum of law stating the legal basis for the request to treat *Exhibit 2* confidentially.

II. Applicable Laws and Regulations for submitting information confidentially before the Energy Bureau

9. Section 6.15 of Act 57-2014 regulates the management of confidential information filed before this Energy Bureau. It provides, in pertinent part, that: “[i]f any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the Commission to treat such information as such” 22 LPRA § 1054n (2025). If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner

that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.*, Section 6.15(a).

10. In connection with the duties of electric power service companies, Section 1.10(i) of Act 17-2019² further provides that electric power service companies shall submit information requested by customers, except for: (i) confidential information in accordance with the Rules of Evidence of Puerto Rico. 22 LPRA § 1141i (2025).

11. Access to the confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” Section 6.15(b) of Act 57-2014, 22 LPRA § 1054n (2025). Finally, Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who need to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review”. *Id.*, Section 6.15(c).

12. Moreover, the Energy Bureau’s Policy on Confidential Information details the procedures that a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the Energy Bureau’s Policy on Confidential Information requires identification of the confidential information and the filing of a memorandum of law, “no later than ten (10) days after filing of the Confidential Information”, explaining the legal basis and support for a request to file information confidentially. *See* Policy on Confidential Information, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The

² Known as the “Puerto Rico Energy Public Policy Act” (hereinafter, “Act 17-2019”).

memorandum should also include a table identifying the confidential information, a summary of the legal basis for the confidential designation, and a summary of the reasons each claim or designation conforms to the applicable legal basis for confidentiality. *Id.*, paragraph 3. The party that seeks confidential treatment of information filed with the Energy Bureau must also file both a “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.*, paragraph 6.

13. Relatedly, Energy Bureau Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, includes a provision for filing confidential information in adjudicatory proceedings before this honorable Energy Bureau. To wit, Section 1.15 provides that, “a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to . . . Article 6.15 of Act No. 57-2015, as amended.”

III. Legal Basis and Arguments in Support of Confidentiality

14. Section 4(x) of the *Puerto Rico Open Government Data Act*, Act 122-2019, exempts from public disclosure commercial or financial information whose disclosure will cause competitive harm. 3 LPRC § 9894. The hourly data relied on in the development of the Supplemental Scenarios, included as *Exhibit 2* to this Motion, contains or references proprietary PLEXOS© formulas and pivot tables belonging to third parties. These PLEXOS© formulas and pivot tables constitute commercial or financial information within Section 4(x) of Act 122-2019,

as they possess independent economic value and provide a business advantage by virtue of not being generally known or readily accessible to competitors or the public.

15. Moreover, reasonable measures have been taken to maintain the confidentiality of this information, consistent with statutory requirements. Disclosure of these PLEXOS© formulas and pivot tables would risk competitive harm to the third party and undermine public policy favoring the protection of commercially valuable confidential information. Therefore, LUMA requests that the Energy Bureau grant confidential treatment to these PLEXOS® formulas and pivot tables, all of which are proprietary to third parties, to ensure compliance with the statutory protections afforded under Puerto Rico law.

IV. Identification of Confidential Information

16. In compliance with the Energy Bureau’s Policy on Confidential Information, CEPR-MI-2016-0009, a table summarizing the hallmarks of this request for confidential treatment is hereby included.

Document	Name	Pages in which Confidential Information is Found	Summary of Legal Basis for Confidentiality Protection	Date Filed
Exhibit 2	CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B	Entire File	Third-Party Proprietary Information	January 15, 2026
	CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B.2	Entire File	Third-Party Proprietary Information	January 15, 2026

Document	Name	Pages in which Confidential Information is Found	Summary of Legal Basis for Confidentiality Protection	Date Filed
	CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004C	Entire File	Third-Party Proprietary Information	January 15, 2026
	CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-008D	Entire File	Third-Party Proprietary Information	January 15, 2026

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the detailed responses to questions 4b, 4c, 4d, and 8d of the *First Set of 2025 IRP Post Filing Request For Information*, as *Exhibit 1* of this Motion, and the hourly data, as *Exhibit 2* of this Motion; and **approve the request for confidential treatment** of the information submitted in *Exhibit 2* to this Motion.

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 January 15, 2026.



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Exhibit 1

2025 Integrated Resource Plan (2025 IRP)

Attachment A Responses to First
Set of 2025 IRP Post-filing
Request For Information (RFI) /
Hourly Data

Executive Summary

LUMA hereby submits its responses to questions 4b, 4c, 4d, and 8d of the First Set of 2025 Integrated Resource Plan (IRP) Post-Filing Requests For Information (First Set of 2025 IRP Post-Filing RFI), issued by the Puerto Rico Energy Bureau (Energy Bureau) on December 3, 2025.

LUMA remains committed to supporting and advancing the transformation of Puerto Rico's energy system into one that is more resilient, cleaner, and sustainable for all customers. As the operator of the transmission and distribution (T&D) system, LUMA is responsible for developing an IRP that outlines the transformation of the island's energy resources over the next two decades. LUMA's 2025 IRP is designed to meet customer energy needs while aligning with Puerto Rico's public energy policies, including achieving 100% renewable energy by 2050, in a reliable and responsible manner that serves the long-term interests of Puerto Rico.

LUMA's energy planning approach incorporates a wide range of considerations, including resource constraints, land use, cost dynamics, and the integration of emerging technologies.

LUMA values the opportunity to collaborate closely with the Energy Bureau and its consultants to develop a practical and actionable plan that supports Puerto Rico's long-term energy goals. The shared goal is to shape a 2025 IRP grounded in analytical rigor and reflective of a diverse range of realistic future scenarios and resource portfolios, ultimately guiding Puerto Rico toward a sustainable, reliable, and customer-focused energy future aligned with public policy priorities.

2025 INTEGRATED RESOURCE PLAN

Attachment A

NEPR-AP-2023-0004

RESPONSE: RFI-LUMA-AP-2023.0004-20251203-PREB

INTRODUCTION

On December 3, 2025, the Puerto Rico Energy Bureau issued its First Set of 2025 IRP Post-Filing RFI. LUMA submitted narrative responses on December 22, 2025, except for questions 4b, 4c, 4d, and 8d, which required extensive hourly-level data extraction from PLEXOS® across all scenarios and a 20-year modeling horizon, necessitating additional time and resources.

In light of this complexity, LUMA requested an extension on December 22, 2025, to complete the required data compilation and analysis. In a Resolution and Order issued on December 23, 2025, the Energy Bureau granted the request, authorizing LUMA to submit the hourly data and corresponding responses to questions 4b, 4c, 4d, and 8d by January 15, 2026.

Accordingly, LUMA submits herein its responses to questions 4b, 4c, 4d, and 8d, together with the associated hourly modeling outputs, in compliance with the Energy Bureau's directive.

2025 INTEGRATED RESOURCE PLAN

List of Responses and Attachments

Response ID	Document Type	Response Subject
CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B	Hourly Data Folder	Annual LT and Hourly ST data for PRP, Scenario 1 and Scenario 12
CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B.2	Excel document	FOR calculation Juncos and Guayama Solar
CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004C	Hourly Data Folder	Hourly results final iteration
CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-008D	Hourly Data Folder	BESS dispatch examples

2025 INTEGRATED RESOURCE PLAN

List of Acronyms

ACRONYM	DEFINITION
BESS	Battery Energy Storage System
EUE	Expected Unserved Energy
IRP	Integrated Resource Plan
LOLE	Loss Of Load Expectation
LOLP	Loss Of Load Probability
LT	Long-Term
MW	Megawatt
PRP	Preferred Resource Plan
PV	Solar photovoltaic
RFI	Request for Information
ST	Short-Term

2025 INTEGRATED RESOURCE PLAN

Attachment A NEPR-AP-2023-0004

Response: RFI-LUMA-AP-2023.0004-20251203-PREB-004b-d

SUBJECT

Outage and Loss Of Load Expectation (LOLE) Modeling

REQUEST

4. Reference: IRP Report Sections 8.2.5-8.2.6 (Outage and LOLE Modeling), including Short-Term (ST) Module model run results on an hourly basis.
 - a. [...]
 - b. For each year of the planning horizon (2025 through 2044) provide the hourly ST and annual LT dispatch results for each iterative step for Scenario 1, the PRP, and Scenario 12, or state the specific source / filename reference in the workpapers that contain these results if already submitted. These hourly results should show at minimum the hourly detail of forced outages and planned maintenance by unit, as well as the unserved energy in each hour and the capacity builds and retirements per year.
 - c. Provide the final hourly Gen ST, Battery ST, and Region ST results for Scenario 1, the PRP; and Scenario 12, or state the specific source / filename reference in the workpapers that contain these results if already submitted.
 - d. Confirm, or explain otherwise that the final ST hourly run results provide the same energy generation results seen in aggregate on an annual basis in summary PLEXOS files provided in the Exhibit 2 folder "Confidential PLEXOS Solution spreadsheets".

RESPONSE

- b. For hourly short-term (ST) results, including generation, forced outages, maintenance, and unserved energy across all iterations of the Preferred Resource Plan (PRP), Scenario 1, and Scenario 12 for generators and batteries, refer to the files in attached folder titled "CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B." ¹ Note that the folder names identify the scenario name and iteration number. For the annual addition and retirements from the LT module iterations and the annual dispatch from the LT module

¹ When reviewing the hourly detail of forced outages an additional 1% forced outage rate was found to have been erroneously applied across all scenarios to two Tranche 1 solar units: Guayama Solar Energy and Juncos I PV. LUMA's analysis of the impact of this error in the forced outage input is included in the attached file "CONFIDENTIAL RFI-LUMA-AP-2023.0004-20251203-PREB-004B.2." Since approximately half of the additional forced outage hours occurred during nighttime (between sunset and sunrise), when solar generation is not possible, the 1% outage rate does not change the outcome of the results. Similarly, an additional 1% forced outage rate was found to have been erroneously applied across all scenarios to Pattern Barceloneta and Pattern Santa Isabel Battery Energy Storage System (BESS) units. The impact of this error does not change the outcome of the results since the incremental forced outage hours overlap periods of BESS unavailability (i.e., scheduled outages) and non-operation hours due to commitment & dispatch economics and constraints.

2025 INTEGRATED RESOURCE PLAN

- iterations for each of the three scenarios, refer to the files in the same folder titled “CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004B.”²
- c. For the hourly results of the final iteration for Generator ST, Battery ST, and Regional ST under Scenario 1, PRP, and Scenario 12, refer to the files in the folder titled “CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-004C”
 - d. Yes, the final ST hourly run results provide the same energy generation results seen in aggregate on an annual basis in summary PLEXOS® files provided in the Exhibit 2 folder “Confidential PLEXOS Solution spreadsheets”

² Several Excel files provided in response to questions “4b” and “4c” are large, with some exceeding 1GB in size. Depending on the computer’s specifications (e.g., memory and CPU), the file may take time to fully open, and certain Excel functions—such as sorting and filtering—may not work properly.

2025 INTEGRATED RESOURCE PLAN

Attachment A

NEPR-AP-2023-0004

Response: RFI-LUMA-AP-2023.0004-20251203-PREB-008b-d

SUBJECT

Battery ST Items

REQUEST

8. Reference: PLEXOS Solution Spreadsheets, including "CONFIDENTIAL_25.10.03 IRP Summary Results_Scl_HYBRID A - PRP.xlsm, Tab "Battery ST". The annual capacity factors (between 2026 and the end of the modeling horizon) of the aggregate of Tranche 1, Tranche 2, Tranche 4, and new Genera Battery units on the "Battery ST" tab for the Scenario 1 Hybrid A PRP scenario in all but the last few years of the planning horizon are on the order of 5-6% (based on the "Generation MWh" field).
- a. [...]
 - b. [...]
 - c. [...]
 - d. If not already provided in response to question 4 c) above, provide the hourly ST file that contains the dispatch results illustrating how these battery resources were utilized and their contribution to reducing EUE.

RESPONSE

- d. Refer to the response to question 4 c) above for the hourly Battery Energy Storage (BESS) dispatch data. Additionally, refer to the attached folder titled "CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-008D" that provides two examples of BESS dispatch reducing Expected Unserved Energy (EUE) in the PRP scenario.

In the attachment "CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-008D", cells A1:AZ6 provide the first example where at date and time "12/1/2031 23:00", the BESS units dispatch to minimize EUE (i.e., 4.51 MW shown in cell F3). Cell G3 then shows the higher value of EUE (i.e., 370.81 MW versus 4.51 MW) had the BESS units not been committed and dispatched at that hour and at the levels shown.

In the same attachment "CONFIDENTIAL_RFI-LUMA-AP-2023.0004-20251203-PREB-008D", cells A11:AZ16 provide the second example where at date and time "11/30/2034 17:00", the BESS units dispatch to minimize EUE (i.e., 116.23 MW shown in cell F13). Cell G13 then shows the higher value of EUE (i.e., 404.91 MW versus 116.23 MW) had the BESS units not been committed and dispatched at that hour and at the levels shown.

Exhibit 2