NEPR

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

IN RE: ELECTRIC VEHICLE CHARGING INFRASTRUCTURE DEPLOYMENT	**CASE NO. NEPR-MI-2021-0013** **SUBJECT: Motion to Submit Responses to Requests for Information in Compliance with Resolution and Order of January 7, 2026**

MOTION TO SUBMIT RESPONSES TO REQUESTS FOR INFORMATION IN COMPLIANCE WITH RESOLUTION AND ORDER OF JANUARY 7, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC and LUMA Energy ServCo, LLC** (collectively, "LUMA"), through the undersigned legal counsel, and respectfully states, submits and requests the following:

I. Introduction

As per directives of the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau"), in 2023 LUMA issued the Puerto Rico Electric Vehicle Adoption Plan ("PR-EVAP") (covering fiscal years ("FY") 2024 to 2025), to accelerate the growth and infrastructure deployment for electric vehicles ("EV"), and launched in 2024 an EV Time of Use Rate pilot program. LUMA has also been filing since 2024 Semi-Annual Reports on the PR-EVAP.

On November 3, 2025, LUMA filed a revised PR-EVAP for FYs 2026, 2027 and 2028 and a proposed semi-annual reporting template. With this Motion, LUMA responds to Requests for Information from the Energy Bureau relating to the revised PR-EVAP, in compliance with a Resolution and Order from the Energy Bureau notified on January 7, 2026.

II. Relevant Procedural Background

1. On January 13, 2023, the Energy Bureau issued a Resolution and Order (the "January 13th Order") regarding the Draft Phase I EV Plan filed by LUMA on September 22, 2022[1] and a proposed Interim EV Time of Use pilot rate ("Interim TOU Rate") filed by LUMA on July 21, 2022[2]. Among others, the Energy Bureau approved the Interim TOU Rate, subject to certain modifications, and directed LUMA to file a Final Phase I EV Plan and Semi-Annual Reports.

2. On May 1, 2023, LUMA submitted to the Energy Bureau the Final Phase I EV Plan in the form of a document titled Puerto Rico's Electric Vehicle Adoption Plan ("PR-EVAP").[3]

3. On June 6, 2023, the Energy Bureau issued a Resolution and Order taking notice of the filing of the PR-EVAP.

4. On February 29, 2024, LUMA filed the first PR-EVAP Semi-Annual Report for FY24.[4]

5. On April 23, 2024, the Energy Bureau issued a Resolution and Order directing LUMA to use a reporting template provided by the Energy Bureau for all PR-EVAP Semi-Annual Reports.

[1] *See Motion Submitting Draft Phase I EV Plan and Request to Postpone Compliance Technical Hearing No. 3 and Concomitant Deadline to Submit Revised Phase I EV Plan*
[2] *See Motion Submitting Revised EV Rate Design Proposal*.
[3] *See Motion to Submit Final Phase I EV Plan in Compliance with Resolution and Order of January 13, 2023*.
[4] *See Motion to Submit Semi-Annual Report in Compliance with Order of January 13, 2023.*

6. On April 30, 2024, LUMA informed the Energy Bureau that it had completed the development and launch of the Interim EV TOU Rate.[5]

7. On May 24, 2024, LUMA submitted a revised version of its first PR-EVAP FY24 Semi-Annual Report using the reporting template provided by the Energy Bureau.[6]

8. On August 30, 2024, and February 28, 2025, LUMA filed its FY24 Second Semi-Annual Report and FY25 First Semi-Annual Report, respectively.[7]

9. On September 2, 2025, LUMA filed its FY25 Second Semi-Annual Report.[8]

10. On November 3, 2025, LUMA filed a revised PR-EVAP for Fiscal Years 2026, 2027 and 2028 ("Revised PR-EVAP") and a proposed semi-annual reporting template.[9]

11. On January 7, 2026, the Energy Bureau issued a Resolution and Order ("January 7th Order") indicating that it had reviewed LUMA's Revised PR-EVAP and determining that additional information was required.[10] The Energy Bureau then ordered LUMA to provide responses to Requests for Information ("ROI") set forth in the January 7th Order within ten (10) business days of the issuance of the January 7th Order.

III. Responses to January 7th ROI

12. In compliance with the January 7th Order, LUMA hereby submits its responses to the January 7th ROI. *See Exhibit 1*. Additionally, LUMA requests for PREB's approval of the

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[5] *See Informative Motion Regarding Launch of Interim EV TOU Rate and Request of Release from Requirements to File Billing Integration Reports*.

[6] *See Motion to Submit a Revised Semi-Annual Report in Compliance with Order of April 23, 2024.* LUMA subsequently filed another version of the report to incorporate typographical and format corrections, the need for which was noticed after the report was filed. *See Motion to Submit Corrected Exhibit 1 to Motion to Submit a Revised Semi-Annual Report in Compliance with Order of April 23, 2024*, filed on May 24, 2024.

[7] *See Motion to Submit Second Semi-Annual Report for Fiscal Year 2024, in Compliance with Orders of January 13, 2023, and April 23, 2024*, and *Motion to Submit First Semi-Annual Report for Fiscal Year 2025*.

[8] *See Motion to Submit Second Semi-Annual Report for Fiscal Year 2025*.

[9] *See Motion to Submit Revised PR-EVAP and Semi-Annual Report Template*.

[10] *See* January 7th Order, p. 2.

revised PR-EVAP for Fiscal Years 2026, 2027 and 2028 ("Revised PR-EVAP") and the proposed semi-annual reporting template as submitted on November 3, 2025, ahead of LUMA's February deadline to file the next semi-annual report.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept Exhibit 1** as LUMA's responses to the January 7th ROI in compliance with the January 7th Order.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 22nd day of January 2026.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic courtesy copy of this motion to the attorneys for PREPA, Mirelis Valle Cancel, mvalle@gmlex.net and Alexis Rivera, arivera@gmlex.net, and to the Independent Office of Consumer Protection by submittal to Hannia Rivera, hrivera@jrsp.pr.gov. LUMA understands that other participants or stakeholders in this proceeding will be notified as a result of the publicity of the filings in this process. Notwithstanding, LUMA will send a courtesy copy of the filing to the following stakeholders: agalloza@aggpr.com; alberto.cortes@warrendelcaribe.com; aldo@skootel.com; angel.d.rodriguez@outlook.com; antonio@velocicharge.com; apietrantoni@pmalaw.com; azayas@azeng.net; bigwheelcorp@gmail.com; blazquezmalu@gmail.com; brightsunpr@gmail.com; carlosxcedeno@gmail.com; clrivera@caguasexpressway.com; flota@caguasexpressway.com; cnegrette@solrenew.com; CR.Tejera@ddec.pr.gov; dacosta@aggpr.com; daniel.perez@totalenergies.pr; dcordero@group-em.com; direxec@ciapr.org; divine.energy@hotmail.com; ecruz@pmalaw.com; eduardo.pinera@toyota.com; Edwin.Acevedo@ddec.pr.gov; emelyies.torres@toyota.com; epenergypr@gmail.com; erica.cosme@gsonnell.com; Fberrios@peritoselectricistas.org; francisco.berrios@hotmail.com; franciscojrullan@yahoo.com; gerard.berlinski@toyota.com; gerardo_cosme@solartekpr.net; gperez@solrenew.com; hamely@motorambar.net; ialsina@plazalasamericas.com; idiaz@glenninternational.com; info@carlosmatta.com; jack@pantekpartners.com; jameauxl@aim.com; jan.rodriguez@toyota.com; javrua@sesapr.org; jbouza@caguasexpressway.com; jcardona@aggpr.com; jmartinez@pmalaw.com; jorrodriguez@motorambar.net; jortiz@caguasexpressway.com; jose.maeso@crowley.com; jpibernus@motorambar.com; JSantana@motorambar.com; jtosado@motorambar.net; juan.diaz.galarza@guidehouse.com; jvazquez905@gmail.com; kenan.d.davila@sargentlundy.com; kkoch@tesla.com; l.marcano@aconer.org; lsundeen@tesla.com; luisgmoreno@gmail.com; Marangelly.Cruz@toyota.com; marilyn.maldonado@toyota.com; mlandron@plazaad.com; mpietrantoni@pmalaw.com; nannette.berrios@solpetroleum.com; nmontes@ccmpr.com; nrodriguez@senado.pr.gov; Ochavez@Padigm.com; odette@grupofernandezpr.com; omundo@plazalasamericas.com; patlopez00@gmai1.com; dany.oliva@toyota.com; pjcleanenergy@gmail.com;

rdiaz@glenninternational.com; repagan@burnsmcd.com; rry@tcm.law; Ruben.Gonzalez@pumaenergy.com; rvega@guidehouse.com; salvadorlopez5@hotmail.com; shehaly.rosado@ddec.pr.gov; Veronica@pantekpartners.com; Victor.Aponte@toyota.com; victor.martinez@totalenergies.pr; wilfredsonllc@gmail.com; zlopez@efonalledas.com; mara.cruz@toyota.com; lizette.cotto@toyota.com.

DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Laura T. Rozas
Laura T. Rozas
RUA Núm. 10,398
laura.rozas@us.dlapiper.com

Exhibit 1

Responses to January 7th ROI

[Two Excel table attachments to be submitted via email]

Responses to January 7, 2026, RFIs regarding Electric Vehicles

NEPR-MI-2021-0013

January 22, 2026

LUMA

List of Responses and Attachments

Response ID	Document Type	Response Subject
RFI-LUMA-MI-2021-0013-20260107-PREB-#001	Response in PDF	Charging Infrastructure and Reliability
	Attachment 1 in PDF	
RFI-LUMA-MI-2021-0013-20260107-PREB-#002	Response in PDF	Equitable Access
RFI-LUMA-MI-2021-0013-20260107-PREB-#003	Response in PDF	EV Time-of-Use (TOU) Rate
	Attachment 1*	
	Attachment 2*	
RFI-LUMA-MI-2021-0013-20260107-PREB-#004	Response in PDF	Charging Behavior Study
RFI-LUMA-MI-2021-0013-20260107-PREB-#005	Response in PDF	Fuel Cost Savings
	Attachment 1 in PDF	
RFI-LUMA-MI-2021-0013-20260107-PREB-#006	Response in PDF	Grid Modernization
RFI-LUMA-MI-2021-0013-20260107-PREB-#007	Response in PDF	EV Load Projections
RFI-LUMA-MI-2021-0013-20260107-PREB-#008	Response in PDF	EV TOU Rate Pilot
RFI-LUMA-MI-2021-0013-20260107-PREB-#009	Response in PDF	Smart Charging and Managed Charging
RFI-LUMA-MI-2021-0013-20260107-PREB-#010	Response in PDF	System Upgrades
RFI-LUMA-MI-2021-0013-20260107-PREB-#011	Response in PDF	FY2026 Costs
RFI-LUMA-MI-2021-0013-20260107-PREB-#012	Response in PDF	Education and Outreach
RFI-LUMA-MI-2021-0013-20260107-PREB-#013	Response in PDF	Collaboration
RFI-LUMA-MI-2021-0013-20260107-PREB-#014	Response in PDF	Fleet Electrification Surveys
RFI-LUMA-MI-2021-0013-20260107-PREB-#015	Response in PDF	Fleet Electrification Barriers

*Note: *Denotes attachments that have been provided in Microsoft Excel format.*

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#001

REQUEST

Refer to the customer survey responses on page 8 of the Revised PR-EVAP.

a. Please list all the ways the Revised PR-EVAP will address the lack of charging infrastructure. Please answer for both private and public charging infrastructure.

b. Please list all the ways the Revised PR-EVAP will address electrical system reliability.

RESPONSE

a. LUMA does not contemplate the direct deployment, ownership, or operation of public electric vehicle charging infrastructure under the Revised PR-EVAP.

Consistent with its role as the operator of Puerto Rico's electric transmission and distribution system, LUMA's responsibility is to act as a facilitator for third-party entities seeking to develop public charging infrastructure across Puerto Rico. In this capacity, LUMA supports charging infrastructure development by:

- Providing transparent and non-discriminatory interconnection processes for electric vehicles (EV) charging developers
- Coordinating with relevant stakeholders to facilitate the safe and reliable integration of public charging infrastructure into the electric system

The revised PR-EVAP is designed to reduce barriers to market-driven charging infrastructure deployment through partnerships, education, and outreach, while ensuring that new public charging assets are integrated in a way that maintains system reliability and safety.

With respect to private charging infrastructure, the Revised PR-EVAP addresses this area through facilitation and technical support, consistent with LUMA's role.

LUMA maintains general interconnection guidelines applicable to any project requiring electrical interconnection and load integration. Refer to RFI-LUMA-MI-2021-0013-20260107-PREB-#001_Attachment 1, Guidelines for New Connection Project Procedures. These guidelines are not exclusive to electric vehicle charging projects but are available to support all entities and companies, including those interested in the development and deployment of private EV charging infrastructure. Through these established processes, LUMA provides clarity on technical requirements, safety standards, and coordination steps necessary for interconnection.

Furthermore, LUMA has collaborated with the Puerto Rico Highways and Transportation Authority to perform high-level assessments identifying areas with potential electrical capacity to support EV chargers along designated Alternative Fuel Corridors, as part of the National Electric Vehicle Infrastructure initiative. These efforts support the market-led development of private charging infrastructure by reducing informational and technical barriers, while ensuring the safe and reliable integration of new loads into the electric system.

b. LUMA recognizes that the continued adoption of electric vehicles has the potential to impact the electric distribution system, particularly as EV charging load increases and becomes more concentrated in certain areas.

At this time, the Revised PR-EVAP does not include a stand-alone initiative specifically dedicated to EV-driven system reliability improvements. However, this should not be interpreted as a lack of awareness or inaction. Rather, LUMA's approach reflects the need to balance EV-related considerations with broader system reliability priorities across the electric grid.

LUMA is actively executing numerous grid improvement and modernization efforts across the distribution system, targeting critical infrastructure needs that affect overall reliability, resiliency, and customer service. Given the extent of system vulnerabilities and the number of critical areas requiring attention, these improvements are being prioritized based on system risk, operational necessity, and available resources.

While these reliability enhancements are not currently driven by a discrete EV charging impact analysis, they nevertheless seek to contribute to strengthening the grid's ability to accommodate current and future load growth, including incremental demand associated with electric vehicle adoption.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#002

REQUEST

Refer to the discussion of promoting equitable access to EVs on page 8 of the Revised PR-EVAP.

a. Explain how the Revised PR-EVAP will promote equitable access to EVs and how LUMA will track improved access to EVs?

b. Please explain how the Revised PR-EVAP will support low-income customers.

RESPONSE

a. The Revised PR-EVAP seeks to promote equitable access to electric vehicles through an information-driven approach designed to inform all customer segments on the opportunities to participate in the transition to electric transportation.

   LUMA will provide clear and accessible information to customers regarding the economic and environmental benefits of electric vehicles. This includes education on potential fuel and maintenance cost savings, as well as the role of EV adoption in supporting emissions reductions and broader environmental goals. Future EV-related initiatives developed by LUMA will be guided by a framework with the objective of ensuring that program design, outreach strategies, and eligibility considerations do not inadvertently exclude or disadvantage any segment of the population.

   To track progress toward improved access, LUMA will document customer engagement on EV-related initiatives as they are implemented.

b. The Revised PR-EVAP seeks to support low-income customers primarily through targeted education and inclusive outreach strategies designed to improve awareness of electric vehicle opportunities and related benefits.

   LUMA seeks to provide updated, relevant, and accessible information through its website and other communication strategies to enable customers to better understand available options, potential benefits, and emerging opportunities associated with electric vehicle adoption.

   Through these efforts, the revised PR-EVAP seeks to support equity objectives by helping to address informational barriers and by promoting awareness among customer segments and transportation stakeholders.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#003

REQUEST

Regarding LUMA's EV Time of Use (TOU) rate on pages 8 and 9 of the Revised PR-EVAP please answer the following:

a. Provide all workpapers associated with Table 1 in Microsoft Excel format with formulas intact.

b. Provide the percentage (%) of EV TOU charging that occurred during each period for the EV TOU rate.

c. Provide the average 8760 EV charging load data for all EV TOU rate participants for each year of the pilot in Microsoft Excel format.

d. Provide the average 8760 EV charging load data for customers not enrolled in the pilot in Microsoft Excel format.

e. Please explain why only five (5) timestamps are provided.

f. Did LUMA consider modifying on- and off-peak periods for the TOU rate? Please explain why or why not.

RESPONSE

a. Please refer to RFI-LUMA-MI-2021-0013-20260107-PREB-#003_Attachment 1 for the workpaper associated with Table 1. This table highlights the occurrence of simultaneous charging events. The methodology applied in this updated analysis offers improved temporal accuracy compared to the prior approach, which aggregated sessions into broader time intervals. As a result, the current data more accurately captures the recurring nature of concurrent charging activity within the network.

b. Please refer to RFI-LUMA-MI-2021-0013-20260107-PREB-#003_Attachment 2. The percentage (%) of EV TOU charging that occurred during each period for the EV TOU rate is as follows:

EV TOU rate period	Percentage of EV TOU charging
Off Peak	45%
Mid Peak	38%
On Peak	17%

c. The average yearly charging load data from enrolled customers is 20.57 kWh. Please refer to RFI-LUMA-MI-2021-0013-20260107-PREB-#003_Attachment 2.

d. The average yearly charging load data from non-enrolled customers is 16.87 kWh. Please refer to RFI-LUMA-MI-2021-0013-20260107-PREB-#003_Attachment 2.

e. The five timestamps presented in the Revised PR-EVAP were selected during the development of the filing to illustrate periods in which the highest concentration of electric vehicles were charging simultaneously. These timestamps were chosen based on proximity to Revised PR-EVAP filing and were intended to serve as representative examples of coincident charging behavior, rather than an exhaustive depiction of all charging events.

   The selection of these timestamps was not intended to limit the scope of analysis, but rather to highlight periods of greatest system relevance in a concise and illustrative manner.

   LUMA has included with this submission the full dataset containing the entirety of available EV charging data in RFI-LUMA-MI-2021-0013-20260107-PREB-#003_Attachment 2. The methodology applied in this updated analysis offers improved temporal accuracy compared to the prior approach, which aggregated sessions into broader time intervals. As a result, the current data more accurately captures the recurring nature of concurrent charging activity within the network.

f. Yes, LUMA did consider modifying the on-peak and off-peak periods for the EV TOU rate.

   This consideration was informed by direct feedback received through multiple conversations with existing and prospective EV customers, who indicated that the established off-peak period did not align with typical work schedules. Specifically, many customers noted that they are away from their residences between approximately 9:00 a.m. and 5:00 p.m., which limits their ability to charge their vehicles at home during portions of the off-peak window and reduces their ability to fully realize the intended benefits of the rate design.

   While this feedback highlighted opportunities to improve customer alignment and program effectiveness, implementing modifications to the TOU periods would require additional analysis, system configuration changes, and supporting data infrastructure. Accordingly, the feedback received will be considered in future evaluations of TOU rate design, particularly as LUMA advances the implementation of Meter Data Management Systems (MDMS) and Advanced Metering Infrastructure (AMI), which are expected to enhance data granularity, billing flexibility, and rate design capabilities.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#004

REQUEST

Refer to LUMA's PR-EVAP FY2025 S1 Semi-Annual report on page 27. Please explain the status of the charging behavior study and explain if that will continue in FY26-28 as part of the Revised PR-EVAP.

RESPONSE

LUMA does not plan to continue developing the electric vehicle charging behavior study as part of the Revised PR-EVAP.

The charging behavior study was originally proposed to support planning efforts for customers under the Net Energy Metering tariff structure, with the goal of improving LUMA's understanding of EV charging patterns within that customer segment.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#005

REQUEST

Refer to page 9 of the Revised PR-EVAP. Does the statement that "residential customers can save over $1,000 annually on fuel costs by switching from an ICE vehicle to an EV" based on Puerto Rico specific gasoline and electricity costs? Please provide all workpapers in Microsoft Excel with formulas intact and sources used to develop the fuel cost savings value.

RESPONSE

The statement indicating that residential customers can save over $1,000 annually in fuel costs by switching from an internal combustion engine (ICE) vehicle to an electric vehicle (EV) is not derived from Puerto Rico specific gasoline or electricity cost data.

Rather, the estimate provided at that time was informed by national-level studies conducted across multiple U.S. jurisdictions which analyze comparative fuel and energy costs for ICE vehicles and EVs under a range of driving and pricing assumptions. Specifically, the estimate was based on publicly available research compiled by Coltura[1], included as RFI-LUMA-MI-2021-0013-20260107-PREB-#005_Attachment 1, to this response, which evaluated EV fuel cost savings using aggregated data from all 50 U.S. states.

At present, Puerto Rico specific, comprehensive charging behavior and cost datasets are limited, which constrains the ability to develop a statistically robust, island-specific savings estimate. In the absence of such localized data, LUMA relied on widely cited national research available to provide an illustrative estimate intended to communicate the order of magnitude of potential fuel cost savings, rather than a guaranteed or universal outcome for all customers.

LUMA notes that actual savings will vary based on individual driving behavior, vehicle efficiency, fuel prices, electricity rates, and charging patterns. Accordingly, the estimate is presented for informational and educational purposes and should be interpreted as indicative rather than prescriptive.

[1] https://coltura.org/ev-savings-report/

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#006

REQUEST

Referring to Action #2 on pages 10 and 11 of the Revised PR-EVAP, please answer the following:

a. Explain why costs and actions related to grid modernization belong in the Revised PR-EVAP.

b. Please list and describe which grid modernization technologies will be promoted.

c. Does LUMA have technology in place to utilize EVs with vehicle-to-grid capabilities?

d. Please describe the expected deliverables and outcomes from Action #2 for each year of the Revised PR-EVAP.

RESPONSE

a. Costs and actions related to grid modernization do not belong in the Revised PR-EVAP. The focus of this iteration of the PR-EVAP is on education, research, analysis and plan development.

b. The evaluation of grid-modernization technologies under the PR-EVAP framework, aimed at supporting and enabling vehicle electrification, is currently in progress and will become more defined once AMI is fully deployed.

c. LUMA does not have the technology in place to utilize electric vehicles with vehicle-to-grid (V2G) capabilities.

d. Expected Potential Deliverables and Outcomes (Years 1–3)

1. Grid Modernization Awareness and Planning
   Deliverables
   - Stakeholder workshops to align utilities, regulators, and municipalities on modernization needs

   Outcomes
   - Improved stakeholder understanding of grid modernization requirements to support EV adoption
   - Increased alignment between EV planning efforts and broader grid modernization initiatives
2. EV Charging Infrastructure Education
   Deliverables
   - Educational materials on EV charging technologies and interconnection requirements

Outcomes

- Greater awareness of charging infrastructure options and grid impacts
- Reduced delays caused by knowledge gaps among stakeholders

3. Grid Resilience & Distributed Energy Resources (DER) Knowledge Sharing

Deliverables

- Knowledge-sharing forums focused on EVs, DERs, and resilience strategies

Outcomes

- Increased understanding of how EVs can support grid resilience when integrated with DERs
- Enhanced collaboration across agencies and industry stakeholders
- Foundational knowledge to support future resilient, electrified transportation solutions

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#007

REQUEST

In LUMA's PR-EVAP FY2025 S1 Semi-Annual Report, Section 3.5 on page 19, LUMA states it will continue efforts to improve detailed EV load projections. Is that work complete? If yes, please provide the EV load projections and associated work papers and sources. If not, please explain why this effort is not included in the Revised PR-EVAP.

RESPONSE

Yes, the EV forecast was completed for the 2025 IRP. The forecast was based on the PR100 Study (developed by DOE Labs). The EV forecast is discussed in detail in the IRP report, Section 3.2.6[2]. In the foreseeable future LUMA does not plan to continue efforts related to EV load projections.

[2] Refer to section 3.2.6 of the 2025 Integrated Resource Plan as submitted on October 17, 2025, under docket NEPR-AP-2023-0004. https://setpr.com/wp-content/uploads/2025/10/0.00_IRP-Report_Main-Report_Revised_Redacted.pdf

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#008

REQUEST

Refer to Action #3: EV Rates and Load Management as included in the Revised PR-EVAP.

a. Please explain why LUMA cannot continue the EV TOU rate pilot in its current form through FY2028.

b. Can LUMA renew the contract with Weavegrid?

c. How much would it cost to continue the EV TOU rate pilot for the current number of enrolled customers and if more customers enroll.

d. Please confirm whether LUMA is aware that other jurisdictions provide EV TOU rates without advanced metering. If confirmed, please list each jurisdiction.

e. Please confirm that LUMA's Constrained Budget for FY26-28 as proposed in Case No.: NEPR-AP-2023-0003 LUMA Ex. 7.00 was based on eliminating the EV TOU rate pilot. If not confirmed, please explain why not.

f. Please explain why LUMA's proposed budget for the Revised PR-EVAP does not reflect the Constrained Budget as proposed in Case No. NEPR-AP-2023-0003 LUMA Ex. 7.00 because the EV TOU Rate pilot will be eliminated.

RESPONSE

a. LUMA’s conclusion is that there is limited value in continuing the pilot. In its current form, data quality and quantity is limited and there is a lack of customer interest due to program constraints and low EV penetration on the island. Additionally, pausing the current pilot provides an opportunity to reassess and refine the EV TOU rate design based on lessons learned to date. This includes evaluating potential improvements such as adjusting the TOU charging window to better align with customer charging behaviors. This approach allows LUMA to balance fiscal responsibility with thoughtful program development, ensuring that any future EV TOU offering is better aligned with customer needs, system considerations, and long-term program objectives.

b. Yes, LUMA can renew its contract with Weavegrid. However, LUMA’s conclusion is that there is limited value in continuing the pilot for reasons listed above in answer a of this question.

c. The cost would remain the same but there is little value in the pilot in its given form.

d. LUMA is generally aware that some jurisdictions have implemented EV-related rate structures or charging incentives without relying on fully deployed advanced metering infrastructure (AMI).

However, these approaches are highly jurisdiction-specific and depend on factors such as local regulatory frameworks, market structure, data availability, customer penetration of enabling technologies, and utility system capabilities. As a result, the design and implementation of such programs vary significantly across jurisdictions. LUMA has not conducted a comprehensive, formal benchmarking analysis to identify and validate each jurisdiction offering EV TOU rates without advanced metering, nor to assess the transferability of those models to Puerto Rico. Accordingly, LUMA is unable at this time to provide a definitive or exhaustive list of jurisdictions where such rate structures are in place.

e. Both LUMA's Optimal and Constrained Budget for FY26-28 as proposed in Case No.: NEPR-AP-2023-0003 LUMA Ex. 7.00 assumed eliminating the EV TOU rate pilot as LUMA has concluded that there is limited value in continuing the pilot, regardless of budget.

f. LUMA decided to present the Optimal budget, not the Constrained budget, in the revision to the PR-EVAP as the Optimal Budget represents all the system funding needs, without funding constraints.

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Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#009

REQUEST

Refer to the smart charging and managed charging strategies under Action #3: EV Rates and Load Management of the Revised PR-EVAP.

a. Can LUMA implement automated demand response, smart charging, and managed charging during FY26–28?

b. Please explain why the billing system and technological limitations impacting the EV TOU rate will not also limit smart charging and managed charging deployment.

c. Please describe specific outcomes expected from smart charging and managed charging strategies in FY26, FY27, and FY28.

RESPONSE

a. No, LUMA will not implement automated demand response, smart charging, or managed charging during FY2026–FY2028.

   To clarify, LUMA's role in these activities is centered on education, outreach, and support—not on direct implementation or leadership of these initiatives at this stage. The actions outlined in Action #3 of the Revised PR-EVAP, such as exploring partnerships, collaborating on advanced charging technologies, and researching managed charging programs, are intended to foster awareness, share best practices, and enable coordination with automakers and charging network providers. These industry players will lead the development and deployment of technologies and programs, while LUMA's responsibility is to provide guidance, facilitate stakeholder engagement, and ensure that grid considerations are understood and incorporated.

b. Please see above for answer a of this question.

c. LUMA has not defined specific outcomes or year-by-year deliverables associated with the implementation of smart charging or managed charging strategies for FY2026, FY2027, or FY2028.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#010

REQUEST

Please explain how LUMA can currently offer the EV TOU rate without the required upgrades to the rate engine within LUMA's Customer Care & Billing System (CC&B), completion of advanced metering infrastructure (AMI) meter deployment, and adoption of a Meter Data Management System.

RESPONSE

LUMA is currently able to offer the EV TOU rate by leveraging data from a third-party aggregator. Because LUMA does not yet have the necessary meter infrastructure to capture this data directly, the process is being handled manually within CC&B. This involves manually entering the rate in CC&B and performing calculations using both the original meter data and the third-party aggregator data.

As noted by LUMA during the Technical Conference on May 7, 2025, a Meter Data Management System (MDMS) that plugs into the billing system is critical and necessary to implement dynamic pricing such as TOU rates. Currently, MDMS is still in the procurement phase and several more months of contracts and general procurement processes are expected. Industry standard MDMS implementation takes up to 24 months to ensure proper integration and testing with the billing engine. Even with a standard 24-month MDMS implementation, LUMA's island wide installation and deployment of Automated Metering Infrastructure (AMI) is not scheduled to be completed until the end of calendar year 2028. It is highly recommended that AMI be fully deployed for all customers before moving to TOU rates to ensure fair access across LUMA's customer base.

At the May 7th Technical Conference, LUMA also clarified that an upgrade to the rate engine within the CC&B system would be needed to be able to implement TOU rates. While funding for this upgrade is requested in the current rate review, it would be highly unlikely and cost prohibitive to implement TOU rates before 2028. Additionally, LUMA faces challenges in reconfiguring the system from the way it is highly customized today. As a result, LUMA anticipates dynamic pricing options would not be available before the next rate case.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#011

REQUEST

Refer to the estimated costs for FY26 in Table 2 on page 11 of the Revised PR-EVAP.

a. How much has LUMA spent on the PR-EVAP during FY26?

b. Are the FY26 costs in Table 2 in addition to what has been spent so far in FY26?

RESPONSE

a. FY2026 PR-EVAP Expenditures to Date - As of the end of November 2025, LUMA has incurred a total of $26,423.71 in costs associated with the Electric Vehicle Program.

   However, program execution during FY2026 to date and part of FY2025 has been materially reduced due to the energy system financial constraints given chronic underfunding. These limitations have curtailed planned activities, delayed certain initiatives and restricted the ability to deploy resources at the originally anticipated scale. This dollar figure is not reflective of the program's planned level of activity or expected annual cost profile.

b. The FY2026 cost estimates presented in Table 2 of the Revised PR-EVAP are not incremental to amounts already spent for the Electric Vehicle Program during FY2026. Rather, the costs shown in Table 2 reflect the total estimated FY2026 program costs, inclusive of expenditures incurred to date.

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NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#012

REQUEST

Refer to Table 2 on page 11 of the Revised PR-EVAP that proposes an annual budget of $189,000 per year for Education and Outreach.

a. Please confirm that LUMA plan to utilize education and outreach materials developed during the FY2026.

b. Please explain why an annual budget of $189,000 is required when LUMA only spent $94,145 in FY2024 and $64,563 in FY2025 according to PR-EVAP Second Semi-Annual Reports for FY2024 and FY2025, respectively.

c. Please describe all the ways in which Education and Outreach efforts will differ from those conducted in the previous PR-EVAP.

d. Please explain how education and outreach can benefit low-income customers.

RESPONSE

a. Yes. LUMA plans to utilize and build upon the outreach and education materials developed during FY2026. These materials will serve as a foundation for continued engagement and will be updated or expanded as needed to reflect evolving program objectives, stakeholder feedback, and lessons learned from prior implementation periods.

b. The proposed $189,000 budget reflects a more complete and optimized implementation of education and outreach activities compared to prior years. The increased budget accounts for a full fiscal year execution, expanded scope, improved quality of materials, broader stakeholder engagement, and the resources necessary to meet program requirements more effectively.

c. Education and outreach under the revised PR EVAP will be more structured, targeted, and scalable than in previous years. Efforts will shift from primarily introductory awareness to more tailored content addressing specific customer segments, municipalities, fleet operators, and community organizations. Outreach will also place greater emphasis on practical guidance, grid impacts, charging options, and integration with distributed energy resources, informed by prior program experience.

d. Education and outreach can benefit low-income customers by increasing awareness of EV related programs, incentives, and cost saving opportunities. Clear, accessible information can help reduce barriers to participation, support informed decision making, and ensure that the benefits of transportation electrification, such as lower fuel and maintenance costs and improved resilience, are more equitably accessible across communities

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#013

REQUEST

Please explain how quarterly meetings with Hawaiian Electric during the previous PR-EVAP informed the development of the Revised PR-EVAP.

RESPONSE

Quarterly meetings with Hawaiian Electric (HECO) during the prior PR-EVAP period provided LUMA with valuable insights into electric vehicle adoption initiatives implemented within another islanded utility system.

Through these discussions, LUMA gained an understanding of key challenges encountered by HECO in advancing EV adoption, as well as the strategies and program structures used to address those challenges. Topics discussed included HECO's experience with multiple EV-related TOU rate designs, public charging initiatives, and various incentive programs supporting EV adoption.

This knowledge transfer brings LUMA a better understanding of how certain elements of these initiatives could potentially be considered or adapted in the future, taking into account LUMA's own operational capabilities, system conditions, regulatory framework, and resource constraints. These exchanges supported informed planning and helped shape LUMA's assessment of practical considerations and emerging best practices relevant to the development of the Revised PR-EVAP, while recognizing that program implementation must be tailored to Puerto Rico's specific context.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#014

REQUEST

As part of the previous PR-EVAP, LUMA conducted fleet electrification surveys. Please explain how LUMA used responses and findings from those surveys to inform the actions and offerings in the Revised PR-EVAP.

RESPONSE

Responses received through the fleet electrification surveys conducted under the prior PR-EVAP provided LUMA with direct insight into stakeholder perspectives, enabling a clearer understanding of prevailing challenges, concerns, and expectations related to mobility electrification in Puerto Rico.

Survey feedback highlighted, among other themes, a strong interest in incentive-based programs and the development of charging infrastructure as key factors influencing fleet electrification decisions. These findings informed LUMA's understanding of market needs.

LUMA has not implemented additional programmatic measures beyond education and information-based initiatives. In response to survey findings, LUMA focused on expanding access to educational materials and outreach efforts through existing communication channels.

These efforts were intended to address informational gaps identified through the surveys while remaining aligned with available resources.

Electric Vehicles

NEPR-MI-2021-0013

Response: RFI-LUMA-MI-2021-0013-20260107-PREB-#015

REQUEST

How does LUMA plan to address barriers to the electrifications of fleets in the Revised PR-EVAP?

RESPONSE

Under the Revised PR-EVAP, LUMA's role in addressing barriers to fleet electrification is primarily facilitative and informational.

LUMA will provide relevant and accessible information to organizations operating vehicle fleets to help them better understand the economic, operational, and environmental benefits associated with electric vehicle adoption. This includes sharing best practices related to fleet charging strategies, operational considerations, and general guidance to support informed decision-making.

In addition, LUMA will work collaboratively with its internal planning teams. This coordination is intended to support awareness of potential requirements and facilitate consideration of system improvements where warranted.