

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

NEPR
Received:
Feb 17, 2026
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IN RE:

ENERGY EFFICIENCY AND DEMAND
RESPONSE TRANSITION PERIOD PLAN

CASE NO.: NEPR-MI-2022-0001

SUBJECT: Memorandum of Law in Support of Request for Confidential Treatment of Attachments 1 and 2 of Exhibit 1 to the “Motion to Submit LUMA’s Responses to Requirements of Information in Compliance with Resolution and Order of January 23, 2026”

**MEMORANDUM OF LAW IN SUPPORT OF REQUEST FOR CONFIDENTIAL
TREATMENT OF ATTACHMENTS 1 AND 2 OF EXHIBIT 1 TO THE “MOTION TO
SUBMIT LUMA’S RESPONSES TO REQUIREMENTS OF INFORMATION IN
COMPLIANCE WITH RESOLUTION AND ORDER OF JANUARY 23, 2026”**

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. Relevant Procedural History

1. On January 23, 2026, the Energy Bureau issued a Resolution and Order (“January 23rd Order”) ordering LUMA and PREPA to respond to Requirements of Information, relating to the collections of the Energy Efficiency (“EE”) Rider, included in Attachment A of the January

23rd Order (“January 23rd ROIs”) within ten (10) business days of the notification of the January 23rd Order.¹

2. In compliance with the January 23rd Order, on February 6, 2026, LUMA filed a *Motion to Submit LUMA’s Responses to Requirements of Information in Compliance with Resolution and Order of January 23, 2026* (“February 6th Motion”) submitting, as *Exhibit 1*, LUMA’s responses to the January 23rd ROIs (“February 6th Exhibit 1”). The February 6th Exhibit 1 was accompanied by the following two attachments which were submitted under request for confidential treatment: *Attachment 1 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-A* (“Attachment 1”) and *Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B* (“Attachment 2”).

3. In its February 6th Motion, LUMA requested this Honorable Energy Bureau to keep Attachments 1 and 2 under seal of confidentiality until redacted/public versions were submitted. LUMA informed that it would be submitting the corresponding Memorandum of Law in support of the confidential treatment for both attachments and redacted/public versions thereof protecting the information deemed to be confidential within the next ten (10) days, in compliance with the Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009 issued on August 31, 2016, as amended by the Resolution dated September 16, 2016 (“Policy on Management of Confidential Information”).

4. In accordance with the above, LUMA is submitting below the corresponding Memorandum of Law stating the legal basis for the request to treat Attachments 1 and 2 of the

¹ See *id.*, p. 4.

February 6th Exhibit 1 confidentially. Furthermore, LUMA submits herein the redacted/public versions of Attachments 1 and 2 as **Exhibits A** and **B**, respectively.

II. Memorandum of Law in Support of Request for Confidential Treatment

A. Applicable legal provisions related to the submittal of information confidentially before the Energy Bureau

5. Section 6.15 of the *Puerto Rico Energy Transformation and RELIEF Act*, Act No. 57-2014, as amended (“Act 57-2014”) regulates the management of confidential information filed before this Energy Bureau, providing, 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. 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).

6. Act 57-2014 further provides that 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.” *Id.* Section 6.15(b), 22 LPRA §1054n. In addition, the 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), 22 LPRA §1054n.

7. In connection with the duties of electric power service companies, Section 1.10 (i) of *Puerto Rico Energy Public Policy Act*, Act No. 17-2019, as amended (“Act 17-2019”) provides

that electric power service companies shall submit information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico. 22 LPRR §1141i.

8. The Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended on September 21, 2016 (“Policy on Confidential Information”) details the procedures that a party should follow to request that a document or portion thereof be afforded confidential treatment.² Relatedly, Regulation 8543 includes a provision for filing confidential information in adjudicatory proceedings before this Honorable Energy Bureau.³

B. Request for confidential designation

9. Attachments 1 and 2 of Exhibit 1 contain the names and contact information of various individuals and information about LUMA and/or PREPA bank accounts. This information is safeguarded under Puerto Rico’s legal framework on privacy which protects personal information from disclosure. *See, e.g.*, Const. ELA, Art. II, Sections 8 and 10 protect the right to control personal information and distinctive traits, which applies *ex proprio vigore* and against private parties. *See also e.g. Vigoreaux v. Quiznos*, 173 DPR 254, 262 (2008); *Bonilla Medina v.*

² In essence, the Policy on Confidential Information requires the identification of confidential information and the filing of a memorandum of law explaining the legal basis and supporting evidence for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation and a summary of the reasons why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* paragraph 3. The party who 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.

³ 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. 57-2014, as amended.

P.N.P., 140 DPR 294, 310-11 (1996), *Pueblo v. Torres Albertorio*, 115 DPR 128, 133-34 (1984).

In addition, the Puerto Rico Open Government Data Act provides that the following information is excepted from public disclosure: information the disclosure of which could invade the privacy of third parties or affect their fundamental rights, as well as any type of information related to the street address, telephone number, emergency contact information, social security number, credit card number, tax and/or financial information, bank activity, confidential information of private third parties, trade secrets, tax returns, debt, or pin number, which is collected or maintained by a governmental body. *See* Act 122-2019, Articles 4(vi) and (xi).

10. Based on the above, LUMA respectfully requests the Honorable Energy Bureau to maintain Exhibit 1 in confidence. The following table identifies the confidential information and basis for confidentiality.

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
Exhibit 1 Attachment 1 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-A	Excel table	“Request 001-A” tab, “Account” column (column F)	Bank names and accounts numbers	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019,	February 6, 2026

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
				Articles 4(vi) and (xi).	
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Letter from LUMA Chief Financial Officer to PREPA Executive Director dated May 9, 2025	Page 1	Name of Addressee	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
		Page 2	Name of bank and bank account numbers in first full paragraph; name of signatory at end of letter; and name and contact information of individuals copied.		
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Letter from LUMA Chief Financial Officer to PREPA Executive Director dated May 19, 2025	Page 1	Name of Addressee	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto	February 6, 2026
		Page 2	Name of bank and bank account numbers in first full paragraph; name of signatory at end of letter; and name and contact information of		

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
			individuals copied.	Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B Attachment 1	Letter from LUMA Chief Financial Officer to PREPA Executive Director dated July 8, 2025	Page 1	Name of Addressee and, in last paragraph, the name of bank and bank account numbers.	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
		Page 2	Name of signatory at end of letter; and name and contact information of individuals copied.		
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Letter from LUMA Chief Financial Officer to Public-Private Partnership Authority's Executive Director and PREPA Executive	Page 1	Name of Addressees	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262	February 6, 2026
		Page 2	Numbers of bank accounts		
		Page 3	Name of signatory at end of letter; and name and contact		

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
	Director dated November 20, 2025		information of individuals copied.	(2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Letter from LUMA Chief Financial Officer to PREPA Executive Director dated November 21, 2025	Page 1	Name of Addressee	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
		Page 2	Name of bank and bank account numbers in second paragraph; name of signatory at end of letter; and name and contact information of individuals copied.		
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-	Letter from LUMA Chief Financial Officer to Public-Private Partnership Authority's	Page 1	Names of Addressees	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see</i>	February 6, 2026

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
20260123-PREB-#001-B	Executive Director and PREPA Executive Director dated December 30, 2025	Page 2	Numbers of bank accounts	<i>also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	
		Page 3	Name of signatory at end of letter; and name and contact information of individuals copied.		
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Email thread with subject line: “FW: Movimiento de Fondos para Programa Energy Efficiency” dated March 12, 2025	Page 1	Names and contact information of addressor and addressees	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
		Page 2	Name of bank and bank account numbers		

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Email with subject line: “Transferencia CISA” dated October 22, 2024	Page 1	Names and contact information of addressor, addressees, and persons copied; name of bank and bank account numbers	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Email thread with subject line: “RE: Transferencia Cuenta Operacional Energy Efficiency Program” dated July 24, 2025	Page 1	Names and contact information of addressor, addressees, and persons copied	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act	February 6, 2026
		Page 2	Names and contact information of addressor, addressees, and persons copied		

Document	Description	Page	Identification of Information	Legal Basis for Confidentiality Protection	Date Filed
		Page 3	Name of bank and bank account numbers	122-2019, Articles 4(vi) and (xi).	
Exhibit 1 Attachment 2 to ROI-LUMA-MI-2022-0001-20260123-PREB-#001-B	Email thread with subject line: “FW: Movimiento de Fondos para Programa Energy Efficiency” dated March 12, 2025	Page 1	Names and contact information of addressor and addressees	Personal Information protected under Const. ELA, Art. II, Sections 8 and 10 (<i>see also e.g. Vigoreaux v. Quiznos</i> , 173 DPR 254, 262 (2008)) and financial data under Puerto Rico Open Government Data Act, Act 122-2019, Articles 4(vi) and (xi).	February 6, 2026
		Page 2	Name of bank and bank account numbers		

11. As stated previously, LUMA submits, as **Exhibits A** and **B** herein, public versions of Attachments 1 and 2 to the February 6th Exhibit 1, respectively, in which the above identified information is redacted. LUMA respectfully requests the Energy Bureau to accept **Exhibits A** and **B** herein as the redacted/public versions of Attachments 1 and 2 of the February 6th Exhibit 1.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** this Memorandum of Law in support of the confidential treatment of Attachments 1 and 2 of the February 6th Exhibit 1; **grant** the request herein to keep confidential Attachments 1 and 2 of the February 6th Exhibit 1; and **accept** the redacted/public versions of these attachments included as **Exhibits A** and **B** to this motion as the public versions of these attachments.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of February 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 copy of this Motion to hrivera@jrsp.pr.gov; alexis.rivera@prepa.pr.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; [javrua@sesapr.org](mailto:javrva@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.



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B-7 Tabonuco St.
Suite 1501
Guaynabo, PR 00968
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 A

Redacted/public version of Attachment 1 to the February 6th Exhibit 1

[Excel spreadsheet submitted via email]

Exhibit B

Redacted/public version of Attachment 2 to the February 6th Exhibit 1

May 9, 2025

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention: [REDACTED]
 Executive Director
 PO BOX 364267
 San Juan, Puerto Rico 00936-4267

RE: Funding Request for the Energy Efficiency (“EE”) Budget for Fiscal Years (“FY”) 2024-2025

Dear Executive Director [REDACTED]:

As previously communicated by LUMA to PREPA (*Transmittals # LUMA-PREP-T-00826; LUMA-PREP-T-00827; LUMA PREP-T-00894*), the Puerto Rico Energy Bureau (“PREB”) allocated an annual budget of \$11,531,250.00 for Fiscal Year (“FY”) 2024 and \$13,745,450.56 for Fiscal Year 2025 for the costs associated with the implementation and administration of the Energy Efficiency initiatives (“EE Program”), under docket NEPR-MI-2020-0001 (RE: Puerto Rico Electric Power Authority's Permanent Rate).

Pursuant section Annex I (1)(F) of the T&D OMA¹, LUMA as “Operator shall be responsible for promoting, administering, planning, developing and implementing energy efficiency, demand response, load management and renewable energy programs and policies for the T&D System”. Furthermore, pursuant section 6.1(a)(iv) of the T&D OMA, PREPA has the responsibility to cooperate with LUMA such that the budget and funds in support of the Operations & Maintenance Services are sufficient to meet the Contract Standards.

As of today, LUMA has distributed \$14,192,596 in customer rebates for FY2024 and FY2025, vendor costs, Luma Staff labor, and other miscellaneous expenses associated with the EE Program, and Luma has also accumulated \$2,120,241.44 in unpaid amounts still owed to vendors and customers. Below is a table outlining the current accumulated unpaid invoices for customers and external vendors associated with the EE Program.

Table 1.1 Unpaid Invoices for EE Program

Month	Invoice Number	Cost
July 2024	PS-INV107005	\$ 482,059.13
August 2024	PS-INV107006	\$ 424,055.24
September 2024	PS-INV107153	\$ 106,240.00
October 2024	PS-INV107373	\$ 57,720.00
November 2024	PS-INV107317	\$ 1,712.06

¹ The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed in June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”).



Month	Invoice Number	Cost
January 2025	PS-INV107288	\$ 236,114.29
February 2025	PS-INV106840	\$ 437,575.88
February 2025	PS-INV106697	\$ 374,764.84

Accordingly, LUMA is requesting PREPA to authorize a transfer for \$6,060,670.85 (FY2024 \$2,011,458.67; FY2025 \$4,049,212.19) from PREPA's [REDACTED] Account ending in [REDACTED] to LUMA's Operational Account ending in [REDACTED]. This transfer will be used to pay for the associated services incurred in compliance with the EE Program as mandated by PREB.

Please contact us should you have any questions.

Sincerely,

[REDACTED]

[REDACTED]

Chief Financial Officer

- C: [REDACTED], Chief Financial Officer, PREPA; [REDACTED]
 [REDACTED], Counsel, PREPA; [REDACTED]
 [REDACTED], Controller, PREPA; [REDACTED]
 [REDACTED], Chief Regulatory Officer, LUMA; [REDACTED]
 [REDACTED], VP, T&D OMA Contract Management, LUMA; [REDACTED]
 [REDACTED], Vice President, Customer Experience, LUMA; [REDACTED]
 [REDACTED], Vice President, Customer Programs, LUMA; [REDACTED]
 [REDACTED], Assistant Controller, LUMA; [REDACTED]
 [REDACTED], Payment Processing Manager, Finance, LUMA; [REDACTED]
 [REDACTED], Executive Director, P3A; [REDACTED]
 [REDACTED], P3A ; [REDACTED]
 [REDACTED], Contract Compliance and Control Manager, P3A; [REDACTED]



May 19, 2025

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention: [REDACTED]
 Executive Director
 PO BOX 364267
 San Juan, Puerto Rico 00936-4267

RE: Funding Request for the Energy Efficiency (“EE”) Budget for Fiscal Years (“FY”) 2024-2025

Dear Executive Director [REDACTED]:

As previously communicated by LUMA to PREPA (*Transmittals # LUMA-PREP-T-00826; LUMA-PREP-T-00827; LUMA PREP-T-00894*), the Puerto Rico Energy Bureau (“PREB”) allocated an annual budget of \$11,531,250.00 for Fiscal Year (“FY”) 2024 and \$13,745,450.56 for Fiscal Year 2025 for the costs associated with the implementation and administration of the Energy Efficiency initiatives (“EE Program”), under docket NEPR-MI-2020-0001 (RE: Puerto Rico Electric Power Authority's Permanent Rate).

Pursuant section Annex I (1)(F) of the T&D OMA¹, LUMA as “Operator shall be responsible for promoting, administering, planning, developing and implementing energy efficiency, demand response, load management and renewable energy programs and policies for the T&D System”. Furthermore, pursuant section 6.1(a)(iv) of the T&D OMA, PREPA has the responsibility to cooperate with LUMA such that the budget and funds in support of the Operations & Maintenance Services are sufficient to meet the Contract Standards.

As of today, LUMA has disbursed \$18,648,141 in expenses associated with the EE Program for both FY2024 and FY2025 budgets. Moreover, there are currently \$5,249,241.44 in unpaid amounts still owed to vendors and customers. Below is a table outlining the current accumulated unpaid invoices for customers and external vendors associated with the EE Program.

Table 1.1 Unpaid Invoices for EE Program

Month	Invoice Number	Cost
July 2024	PS-INV107005	\$ 482,059.13
August 2024	PS-INV107006	\$ 424,055.24
September 2024	PS-INV107153	\$ 106,240.00
October 2024	PS-INV107373	\$ 57,720.00
November 2024	PS-INV107317	\$ 1,712.06

¹ The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed in June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”).



Month	Invoice Number	Cost
January 2025	PS-INV107288	\$ 236,114.29
February 2025	PS-INV106840	\$ 437,575.88
February 2025	PS-INV106697	\$ 374,764.84
May 2025	LM25PF009	\$ 3,129,000.00

Accordingly, LUMA is requesting PREPA to authorize a transfer for \$6,060,670.85 (FY2024 \$2,011,458.67; FY2025 \$4,049,212.19) from PREPA's [REDACTED] Account ending in [REDACTED] to LUMA's Operational Account ending in [REDACTED]. This transfer will be used to pay for the associated services incurred in compliance with the EE Program as mandated by PREB.

Please contact us should you have any questions.

Sincerely,

[REDACTED]

[REDACTED]

Chief Financial Officer

- C:
- [REDACTED] Chief Financial Officer, PREPA [REDACTED]
 - [REDACTED] Counsel, PREPA [REDACTED]
 - [REDACTED] Controller, PREPA [REDACTED]
 - [REDACTED], Chief Regulatory Officer, LUMA [REDACTED]
 - [REDACTED] VP, T&D OMA Contract Management, LUMA [REDACTED]
 - [REDACTED] Vice President, Customer Experience, LUMA [REDACTED]
 - [REDACTED] Vice President, Customer Programs, LUMA [REDACTED]
 - [REDACTED], Assistant Controller, LUMA [REDACTED]
 - [REDACTED] Payment Processing Manager, Finance, LUMA [REDACTED]
 - [REDACTED] Executive Director, P3A [REDACTED]
 - [REDACTED], P3A [REDACTED]
 - [REDACTED] Contract Compliance and Control Manager, P3A [REDACTED]



July 8, 2025

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention [REDACTED]
Executive Director
PO BOX 364267
San Juan, Puerto Rico 00936-4267

RE: Funding Request for the Energy Efficiency (“EE”) Budget for Fiscal Years (“FY”) 2024-2025

Dear Executive Director [REDACTED]

As previously communicated by LUMA to PREPA (*Transmittals # LUMA-PREP-T-00826; LUMA-PREP-T-00827; LUMA PREP-T-00894*), the Puerto Rico Energy Bureau (“PREB”) allocated an annual budget of \$11,531,250.00 for Fiscal Year (“FY”) 2024 and \$13,745,450.56 for Fiscal Year 2025 for the costs associated with the implementation and administration of the Energy Efficiency initiatives (“EE Program”), under docket NEPR-MI-2020-0001 (RE: Puerto Rico Electric Power Authority's Permanent Rate).

Pursuant section Annex I (1)(F) of the T&D OMA¹, LUMA as “Operator shall be responsible for promoting, administering, planning, developing and implementing energy efficiency, demand response, load management and renewable energy programs and policies for the T&D System”. Furthermore, pursuant section 6.1(a)(iv) of the T&D OMA, PREPA has the responsibility to cooperate with LUMA such that the budget and funds in support of the Operations & Maintenance Services are sufficient to meet the Contract Standards.

As of today, LUMA has disbursed \$20,277,916.63 in expenses associated with the EE Program for both FY2024 and FY2025 budgets. This amount can be segregated in \$14,559,483.70 for professional & technical outsourced services, materials and supplies, and other miscellaneous expenses. As for the remaining amount of \$5,718,432.93, these are mostly comprised of salary related expenditures.

Accordingly, LUMA is requesting PREPA to authorize a transfer for \$6,060,670.85 (FY2024 \$2,011,458.67; FY2025 \$4,049,212.19) from PREPA's [REDACTED] count ending in [REDACTED] LUMA's Operational Account ending in [REDACTED]. This transfer will be used to pay for the associated services incurred in compliance with the EE Program as mandated by PREB.

¹ The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed in June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”).



Please contact us should you have any questions.

Sincerely,

[REDACTED]

[REDACTED]

Chief Financial Officer

- C: [REDACTED], Chief Financial Officer, PREPA; [REDACTED]
- [REDACTED], Controller, PREPA; [REDACTED]
- [REDACTED], Chief Regulatory Officer, LUMA; [REDACTED]
- [REDACTED], VP, T&D OMA Contract Management, LUMA; [REDACTED]
- [REDACTED], Vice President, Customer Experience, LUMA; [REDACTED]
- [REDACTED], Vice President, Customer Programs, LUMA; [REDACTED]
- [REDACTED], Assistant Controller, LUMA; [REDACTED]
- [REDACTED], Payment Processing Manager, Finance, LUMA; [REDACTED]
- [REDACTED], Executive Director, P3A; [REDACTED]
- [REDACTED], P3A ; [REDACTED]
- [REDACTED], Contract Compliance and Control Manager, P3A; [REDACTED]



November 20, 2025

To: Puerto Rico Public-Private Partnerships Authority (“P3A”)

Attention: [REDACTED]
Executive Director
Roberto Sánchez Vilella (Minillas) Government Center
De Diego Ave. Stop 22,
San Juan, PR 00907

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention: [REDACTED]
Executive Director
PO BOX 364267
San Juan, Puerto Rico 00936-4267

Re: Notice of PREPA Non-Compliance with Service Accounts Funding – October 2025

LUMA is providing written notice of PREPA’s failure to fully fund the Service Accounts, as required under Section 7.5 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”)¹, which states the Owner shall replenish the Service Accounts no later than the tenth (10th) Business Day of each month in accordance with the funding requirements for each Service Account.

On November 17th, 2025, the tenth (10th) Business Day of the month, PREPA failed to fund \$695,525,000 out of \$1,020,232. Service Accounts as required by Section 7.5 of the T&D OMA, including the GenCo Fuel Account as per Section 3.3 of the Puerto Rico PREPA-GenCo-HydroCo Operating Agreement (“PGHOA”)², in an amount equal to the requisite funding amount established therein. PREPA also failed to fund the Outage Event Reserve Account (Section 7.5 (d)(ii) of the T&D OMA), which has remained unfunded since January 2024.

Furthermore, on October 29, 2025, due to the ongoing Service Account underfunding, LUMA withdrew \$31 million from the Contingency Reserve Account for the settlement of outstanding financial obligations and support ongoing operations. Under Section 7.5(f)(iv) of the T&D OMA, PREPA is required to replenish the Contingency Reserve Account by the tenth (10th) Business Day of the following month in accordance with the formula established therein. As of the date of this notice, PREPA has not replenished the Contingency Reserve Account in compliance with the T&D OMA for the fourteen (14th) consecutive month.

¹ The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed on June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”)

² The Puerto Rico PREPA-GenCo-HydroCo Operating Agreement (“PGHOA”) executed on June 19, 2023, by and among the Puerto Rico Electric Power Authority (“PREPA”), PREPA Genco LLC (“GenCo”), PREPA HydroCo LLC (“HydroCo”), LUMA Energy ServCo, LLC (“LUMA”), and the Puerto Rico Public-Private Partnerships Authority (“P3A”)



The following table provides a summary of the current underfunding of the Service Accounts:

Service Accounts	PREB Approved Monthly Budget	Service Account minimum monthly balance required per T&D OMA	Bank Account balance as of 10/31/2025	Minimum Funding Replenishment Required from PREPA (T&D OMA required – Bank Balance)	Amount Replenished by PREPA	Comments
LUMA Energy Service Accounts						
Operating Account [REDACTED]	\$ 62,049	\$ 275,940	\$ 27,058	\$ 248,882	\$ 62,459	
Capital Account - Federally Funded [REDACTED]	\$ 100,596	\$ 452,684	\$ 318,499	\$ 134,185	\$ -	
Capital Account - Non-Federally Funded [REDACTED]	\$ 15,305	\$ 68,872	\$ 9,514	\$ 59,358	\$ 15,305	
Outage Event Reserve Account [REDACTED]	\$ -	\$ 30,000	\$ 1	\$ 29,999	\$ -	The amount of \$29.9M does not include an additional \$237M (approximately) that has not been reimbursed for prior compliant Outage Event expenses as of October 2025.
Purchased Power Account [REDACTED]	\$ 67,643	\$ 135,287	\$ 18,564	\$ 116,723	\$ 65,744	PREPA replenishes this account with funds from Purchase Power and Genera Operating Funds. In this row, we are including only the Purchase Power amount. For the Genera Operating Funds, please refer to the below Genera PR Service Accounts section.
Contingency Reserve [REDACTED]*	\$ -	\$ 78,184	\$ 23,559	\$ 54,625	\$ -	The account has not been funded for the last fourteen months.
LUMA Subtotals	\$ 245,594	\$1,040,967	\$397,195	\$ 643,772	\$ 143,508	T&D OMA Funding Requirement LUMA Subtotal excludes Genera Operating Account funding requirement as it is included in Genera's Operating Account below.
Genera PR Service Accounts						
Genco Operating Account [REDACTED]	\$ -	\$ -	\$ -	\$ 52,414	\$ 26,138	PREPA funds this amount within the Purchase Power account funding. Amount included separately for clarity.
Fuel Account [REDACTED]	\$ -	\$ -	\$ -	\$ 291,912	\$ 155,061	Please note, the amount refunded by PREPA for the Fuel Account includes approximately \$120M in out-of-cycle Fuel Advances Genera obtained from PREPA to fund the Fuel Account. These fuel funding advances, as noted by LUMA on numerous occasions, go against the agreements made under the T&D OMA, LGA OMA, and PGHOA.
Genco Reserve Account [REDACTED]	\$ -	\$ 30,000	\$ 224	\$ 32,134	\$ -	
Genera Subtotals	\$ -	\$ 30,000	\$ 224	\$ 376,460	\$ 181,199	
Total Replenishment Required				\$ 1,020,232		
Total Refunded by PREPA					\$ 324,707	



In addition to the funding previously presented, LUMA has submitted a request for \$15,736,456 (LUMA-PREP-T-01035) to support the Energy Efficiency Program (“EE Program”). This request includes actual expenditures incurred during Fiscal Year (“FY”) 2024 and 2025, as well as a forecasted replenishment of \$1,400,000 for October 2025.

PREPA’s obligation to timely and fully fund Service Accounts is a Material Obligation under the T&D OMA and is necessary to enable LUMA to comply with its responsibilities as Operator of the T&D System in a manner consistent with Contract Standards and Prudent Utility Practice. LUMA strongly urges PREPA to provide the remaining funding for the Service Accounts required by Section 7.5 of the T&D OMA, Section 3.3 of the PGHOA, and Section 7.6 of the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement (“LGA OMA”)³ immediately.

Nothing contained in this Notice shall constitute a waiver or relinquishment by LUMA of any rights and remedies provided by the T&D OMA, the PGHOA, and Applicable Law. LUMA reserves all rights and remedies under the T&D OMA, the PGHOA, and Applicable Law and equity, including but not limited to, pursuing legal action related to the subject of this notice. This shall not be construed as a Notice of an Event of Default. LUMA reserves the right to issue such Notice of an Event of Default.

Sincerely,

[Redacted]

[Redacted]

Chief Financial Officer

- C: [Redacted] Counsel, PREPA; [Redacted]
[Redacted], Chief Financial Officer, PREPA; [Redacted]
[Redacted], Chief Executive Officer, Genera; [Redacted]
[Redacted], Contract Compliance and Control Manager, P3A; [Redacted]
[Redacted], Executive Director, Financial Oversight and Management Board;
[Redacted], Senior infrastructure Manager, FOMB; [Redacted]
[Redacted], President, PREB; [Redacted]
[Redacted], Chief Regulatory Officer, LUMA; [Redacted]
[Redacted], Vice President, T&D OMA Contracts Management, LUMA; [Redacted]
[Redacted], Chief Legal Officer, LUMA; [Redacted]

³ The Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement (“LGA OMA”) executed on January 24, 2023, by and among the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”), and Genera PR LLC (“Genera”).



November 21, 2025

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention: [REDACTED]
 Executive Director
 PO BOX 364267
 San Juan, Puerto Rico 00936-4267

RE: Energy Efficiency (“EE”) Funding Request

Dear Executive Director [REDACTED]:

On August 19, 2025 Puerto Rico Energy Bureau (“PREB”) issued a Resolution and Order (“R&O”)¹ establishing the Fiscal Year (“FY”) 2026 Energy Efficiency Program (“EE Program”) budget of \$16,460,036 which includes a rollover of \$2,520,621 from FY 2025 for the costs associated with the implementation and administration of the EE Program initiatives.

Pursuant to Annex I (1)(F) of the T&D OMA², LUMA as “Operator shall be responsible for promoting, administering, planning, developing and implementing energy efficiency, demand response, load management and renewable energy programs and policies for the T&D System”. Moreover, pursuant Section 6.1(a)(iv) of the T&D OMA, PREPA has the responsibility to cooperate with LUMA such that the budget and funds in support of the Operations & Maintenance Services are sufficient to meet the Contract Standards.

As of today, LUMA has disbursed \$5,718,433, \$15,604,134, and \$1,804,890 for FY 2024, 2025, and 2026, respectively. Of the total \$23,127,457 disbursed amount, PREPA has replenished only \$8,791,001, while the outstanding amount of \$14,336,456 has been partially funded by \$6,034,376 with LUMA’s Operational Account. This activity can be shown as follows:

Description	FY 2024	FY2025	FY 2026 through Sept 2025	Total
Actual Spending	\$5,718,433	\$15,604,134	\$1,804,890	\$23,127,457
PREPA provided Funding	\$ -	\$7,094,688	\$1,696,313	\$8,791,001
Outstanding	\$5,718,433	\$8,509,446	\$108,577	\$14,336,456

¹ Resolution and Order issued by PREB on August 19, 2025, in case number NEPR-MI-2022-0001, In Re: Energy Efficiency and Demand Response Transition Period Plan.

² The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed in June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”).



In addition, LUMA is requesting \$1,400,000 to fund the EE Program for the month of October 2025 to comply with its FY 2026 EE obligations.

Accordingly, LUMA is requesting PREPA to authorize a transfer for \$15,736,456 (\$14,227,879 of actual amounts spent for FY 2024 and FY 2025 as well as \$108,577 of actual spending for FY 2026 and \$1,400,000 forecast for October 2025) from PREPA's [REDACTED] Account ending in [REDACTED] to LUMA's Operational Account ending in [REDACTED]. This transfer will be used to pay for the associated services incurred in compliance with the EE Program as mandated by PREB.

A determination will be made regarding the period to which the funding received will be allocated.

Please contact us should you have any questions.

Sincerely,

[REDACTED]
[REDACTED]

Chief Financial Officer

- C: [REDACTED], Chief Financial Officer, PREPA; [REDACTED]
- [REDACTED], Chief Regulatory Officer, LUMA; [REDACTED]
- [REDACTED], VP, T&D OMA Contract Management, LUMA; [REDACTED]
- [REDACTED], VP Accounting & Controller, LUMA; [REDACTED]
- [REDACTED], Payment Processing Manager, Finance, LUMA; [REDACTED]
- [REDACTED], VP Customer Operations, LUMA; [REDACTED]
- [REDACTED], Executive Director, P3A; [REDACTED]
- [REDACTED], Contract Compliance and Control Manager, P3A; [REDACTED]



December 30, 2025

To: Puerto Rico Public-Private Partnerships Authority (“P3A”)

Attention: [REDACTED]

Executive Director

Roberto Sánchez Vilella (Minillas) Government Center
De Diego Ave. Stop 22,
San Juan, PR 00907

To: Puerto Rico Electric Power Authority (“PREPA”)

Attention: [REDACTED]

Executive Director

PO BOX 364267

San Juan, Puerto Rico 00936-4267

Re: Notice of PREPA Non-Compliance with Service Accounts Funding – December 2025 - Restated

LUMA is providing written notice of PREPA’s failure to fully fund the Service Accounts, as required under Section 7.5 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”)¹, which states the Owner shall replenish the Service Accounts no later than the tenth (10th) Business Day of each month in accordance with the funding requirements for each Service Account.

On December 12th, 2025, the tenth (10th) Business Day of the month, PREPA failed to fund \$830,860 out of \$1,039,034. Service Accounts as required by Section 7.5 of the T&D OMA, including the GenCo Fuel Account as per Section 3.3 of the Puerto Rico PREPA-GenCo-HydroCo Operating Agreement (“PGHOA”)², in an amount equal to the requisite funding amount established therein. PREPA also failed to fund the Outage Event Reserve Account (Section 7.5 (d)(ii) of the T&D OMA), which has remained unfunded since January 2024.

Furthermore, on October 29, 2025, due to the ongoing Service Account underfunding, LUMA withdrew \$31 million from the Contingency Reserve Account for the settlement of outstanding financial obligations and support ongoing operations. Under Section 7.5(f)(iv) of the T&D OMA, PREPA is required to replenish the Contingency Reserve Account by the tenth (10th) Business Day of the following month in accordance with the formula established therein. As of the date of this notice, PREPA has not replenished the Contingency Reserve Account in compliance with the T&D OMA for the fifteen (15th) consecutive month.

¹ The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”) executed on June 22, 2020, amongst the Puerto Rico Electric Power Authority (“PREPA”), the Puerto Rico Public-Private Partnerships Authority (“P3A”) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”)

² The Puerto Rico PREPA-GenCo-HydroCo Operating Agreement (“PGHOA”) executed on June 19, 2023, by and among the Puerto Rico Electric Power Authority (“PREPA”), PREPA Genco LLC (“GenCo”), PREPA HydroCo LLC (“HydroCo”), LUMA Energy ServCo, LLC (“LUMA”), and the Puerto Rico Public-Private Partnerships Authority (“P3A”)



The following table provides a summary of the current underfunding of the Service Accounts:

Service Accounts	PREB Approved Monthly Budget	Service Account minimum monthly balance required per T&D OMA	Bank Account balance as of 12/31/2025	Minimum Funding Replenishment Required from PREPA (T&D OMA required – Bank Balance)	Amount Replenished by PREPA	Comments
LUMA Energy Service Accounts						
Operating Account [REDACTED]	\$ 62,049	\$ 275,940	\$ 41,720	\$ 234,220	\$ 62,459	
Capital Account - Federally Funded [REDACTED]	\$ 100,596	\$ 452,684	\$ 217,221	\$ 235,463	\$ -	
Capital Account - Non-Federally Funded [REDACTED]	\$ 15,305	\$ 68,872	\$ 15,936	\$ 52,936	\$ 15,305	
Outage Event Reserve Account [REDACTED]	\$ -	\$ 30,000	\$ 1	\$ 29,999	\$ -	The amount of \$29.9M does not include an additional \$237M (approximately) that has not been reimbursed for prior compliant Outage Event expenses as of November 2025.
Purchased Power Account [REDACTED]	\$ 69,643	\$ 139,287	\$ 60,584	\$ 78,703	\$ 67,211	PREPA replenishes this account with funds from Purchase Power and Genera Operating Funds. In this row, we are including only the Purchase Power amount. For the Genera Operating Funds, please refer to the below Genera PR Service Accounts section.
Contingency Reserve [REDACTED]	\$ -	\$ 78,184	\$ 23,617	\$ 54,567	\$ -	The account has not been funded for the last fifteen months.
Energy Efficiency	\$ 1,400	\$ -	\$ -	\$ 8,400	\$ -	The funding requirement only reflects the FY 2026 amount. The total replenishment requirement since the inception of the program (FY24, FY25, and FY26) is \$16,459,740.
LUMA Subtotals	\$ 248,994	\$1,044,967	\$359,079	\$ 694,288	\$ 144,975	T&D OMA Funding Requirement LUMA Subtotal excludes Genera Operating Account funding requirement as it is included in Genera's Operating Account below.
Genera PR Service Accounts						
Genco Operating Account [REDACTED]	\$ -	\$ -	\$ -	\$ 41,938	\$ 26,138	PREPA funds this amount within the Purchase Power account funding. Amount included separately for clarity.
Fuel Account [REDACTED]	\$ -	\$ -	\$ -	\$ 270,674	\$ 37,061	Please note, the amount refunded by PREPA for the Fuel Account includes approximately \$93M in out-of-cycle Fuel Advances Genera obtained from PREPA to fund the Fuel Account. These fuel funding advances, as noted by LUMA on numerous occasions, go against the agreements made under the T&D OMA, LGA OMA, and PGHOA.
Genco Reserve Account [REDACTED]	\$ -	\$ 30,000	\$ 224	\$ 32,134	\$ -	
Genera Subtotals	\$ -	\$ 30,000	\$ 224	\$ 344,746	\$ 63,199	
Total Replenishment Required				\$ 1,039,034		
Total Refunded by PREPA					\$ 208,174	



PREPA's obligation to timely and fully fund Service Accounts is a Material Obligation under the T&D OMA and is necessary to enable LUMA to comply with its responsibilities as Operator of the T&D System in a manner consistent with Contract Standards and Prudent Utility Practice. LUMA strongly urges PREPA to provide the remaining funding for the Service Accounts required by Section 7.5 of the T&D OMA, Section 3.3 of the PGHOA, and Section 7.6 of the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("LGA OMA")³ immediately.

Nothing contained in this Notice shall constitute a waiver or relinquishment by LUMA of any rights and remedies provided by the T&D OMA, the PGHOA, and Applicable Law. LUMA reserves all rights and remedies under the T&D OMA, the PGHOA, and Applicable Law and equity, including but not limited to, pursuing legal action related to the subject of this notice. This shall not be construed as a Notice of an Event of Default. LUMA reserves the right to issue such Notice of an Event of Default.

Sincerely,

[Redacted]

VP, Accounting and Controller

- C: [Redacted] Counsel, PREPA; [Redacted]
- [Redacted] Chief Financial Officer, PREPA; [Redacted]
- [Redacted] Chief Executive Officer, Genera [Redacted]
- [Redacted] Contract Compliance and Control Manager, P3A; [Redacted]
- [Redacted] Executive Director, Financial Oversight and Management Board; [Redacted]
- [Redacted] Senior infrastructure Manager, FOMB; [Redacted]
- [Redacted] President, PREB; [Redacted]
- [Redacted] Chief Regulatory Officer, LUMA; [Redacted]
- [Redacted] Vice President, T&D OMA Contracts Management, LUMA; [Redacted]
- [Redacted] Chief Legal Officer, LUMA; [Redacted]

³ The Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("LGA OMA") executed on January 24, 2023, by and among the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and Genera PR LLC ("Genera").



[REDACTED]

From: [REDACTED]
Sent: Wednesday, March 12, 2025 1:58 PM
To: [REDACTED]
Subject: FW: Movimiento de Fondos para Programa Energy Efficiency
Attachments: 20240611 MI20200001 Resolucion y Orden Factores Ajuste Anual.pdf; Facturas.zip; LUMA RI PY2 Pre-Fund Incentive Invoice 8 2.21.2025.pdf

FYI.

Me llamas al [REDACTED]

Thks

From: [REDACTED]
Sent: Tuesday, February 11, 2025 5:52 PM
To: [REDACTED]
Subject: Movimiento de Fondos para Programa Energy Efficiency

Saludos [REDACTED]:

Por la siguiente notifico las facturas pendientes relacionadas al Programa de Energy Efficiency.

Este programa esta incluido como ajuste a la tarifa de los clientes efectivo Julio 2024.

IV. Resumen de las Cláusulas de Ajuste

Luego de evaluar los documentos presentados por LUMA, el Negociado de Energía APRUEBA los siguientes factores anuales a ser implementados como parte de la Tarifa Permanente de la Autoridad a partir de 1 de julio de 2024.

Factores Anuales

Cláusula de Ajuste	Factor (\$/kWh)	Fechas de Efectividad
CILTA	0.003755	1 de julio de 2024 – 30 de junio de 2025
SUBA-HH	0.010847	1 de julio de 2024 – 30 de junio de 2025
SUBA-NHH	0.000916	1 de julio de 2024 – 30 de junio de 2025
EE	0.000853	1 de julio de 2024 – 30 de junio de 2025

Los factores anuales entran en vigor el 1 de julio de 2024 y permanecerán vigentes hasta el 30 de junio de 2025.

Por este medio solicitamos autorización para mover los fondos necesarios para el pago estas facturas.

Los fondos serian movidos de la cuenta de [REDACTED] @ [REDACTED].

Adjunto facturas y contrato

Cualquier duda me dejás saber.

Gracias

SCOTTMADDEN INVOICES NOT PAID	
PS-INV106839 OCT. CBES(1) SM hours	\$ 72,935.00
PS-INV106838 SEPT. CBES(2)	\$ 64,417.50
PS-INV106837 SERVICES CBES/DR SUB.AUGUST 2024	\$ 84,202.50
PS-INV106836 SERVICES CBES SUB. JULY 2024	\$ 38,987.50
PS-INV105925 MAY SERV. EE/DR SUBC. (RI/DR)	\$ 371,769.51
PS-INV105908 APR. SERVIC. SUBC. EE	\$ 230,257.82
PS-INV105203 FEBR. EE	\$ 1,068.55
PS-INV106388 JULY EE/DR SUBC. (RI/NS)	\$ 149,535.17

\$ 1,013,173.55

Los

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 22, 2024 2:25 PM
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: Transferencia CISA
Attachments: LUMA_RI PY2 Pre-Fund Incentive Invoice 8_19_2024 (003) no. 7.pdf; 20240611 MI20200001 Resolucion y Orden Factores Ajuste Anual.pdf

Saludos [REDACTED]

Durante esta semana se estará transfiriendo la cantidad de 3,822,344.00 por concepto del CISA.

Se estarán moviendo los Fondos de la cuenta de [REDACTED] a la [REDACTED] que es la operacional de Luma.

Adjunto encontraras el acuerdo firmado y el pre-funding document.

Cualquier duda o pregunta me dejassaber.

Gracias

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 24, 2025 4:19 PM
To: [REDACTED]
Cc: [REDACTED]; FINANZAS
Subject: RE: Transferencia Cuenta Operacional Energy Efficiency Program
Attachments: SCOTTMADDEN, INC-PS-INV106026.pdf; SCOTTMADDEN, INC-PS-INV106027.pdf; SCOTTMADDEN, INC-PS-INV106035.pdf; SCOTTMADDEN, INC-PS-INV106336.pdf; SCOTTMADDEN, INC-PS-INV106388.pdf; SCOTTMADDEN, INC-PS-INV107288.pdf; SCOTTMADDEN, INC-PS-INV106264.pdf; SCOTTMADDEN, INC-PS-INV106394.pdf; SCOTTMADDEN, INC-PS-INV106841.pdf; SCOTTMADDEN, INC-PS-INV106851.pdf; SCOTTMADDEN, INC-PS-INV107007.pdf; SCOTTMADDEN, INC-PS-INV107737.pdf; SCOTTMADDEN-PS-INV107317.pdf; SCOTTMADDEN, INC-PS-INV107749.pdf; SCOTTMADDEN, INC-PS-INV107748.pdf; SCOTTMADDEN, INC-PS-INV107690.pdf; Solicitiud Cheque Firmada Pago Energy Eff. - Facturas Scottmadden.pdf

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Saludos [REDACTED]

Te incluyo la Solicitud de Cheque firmada para el pago de de facturas Pagadas relacionadas al Efficiency Program.

Cualquier información adicional nos dejás saber,

[REDACTED]

[REDACTED]
Jefe Auxiliar de División



PUERTO RICO
ELECTRIC POWER AUTHORITY
PREPA
GOVERNMENT OF PUERTO RICO



Phone: [REDACTED]
Email: [REDACTED]
Visit our website: <https://aeepr.com>
1110 Ave. Ponce de León, San Juan, PR 00922



From: [REDACTED] <[REDACTED]>
Sent: Monday, July 14, 2025 10:17 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>
Subject: Transferencia Cuenta Operacional Energy Efficiency Program

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Saludos:

Adjunto solicitud para transferencia de fondos relacionados al Efficiency Program.

Se provee lista de facturas Pagadas y pendientes relacionadas al Programa y copia de las facturas.

Cualquier duda me dejan saber.

Gracias.

FACTURAS PAGADAS									
Payee Name	Payee Num.	Check Number	Check Date	Check Amount	Invoice Number	Invoice Date	Type of Program	Period of Service	Invoice Amount
SCOTTMADDEN, INC	121791	100012227	30-Oct-24	137,681.17	PS-INV106026	30-Aug-24	EE	Jul-24	2,336.76
SCOTTMADDEN, INC	121791	100012227	30-Oct-24	137,681.17	PS-INV106027	30-Aug-24	EE	Jul-24	33,895.00
SCOTTMADDEN, INC	121791	100012227	30-Oct-24	137,681.17	PS-INV106035	30-Aug-24	EE	Jul-24	50,995.00
SCOTTMADDEN, INC	121791	100012562	29-Nov-24	372,886.70	PS-INV106264	30-Sep-24	EE	Aug-24	69,840.00
SCOTTMADDEN, INC	121791	100012954	20-Dec-24	65,533.50	PS-INV106336	11-Oct-24	EE	Jul-24	1,912.50
SCOTTMADDEN, INC	121791	100013915	21-Feb-25	174,733.42	PS-INV106388	31-Oct-24	EE	Jul-24	143,415.23
SCOTTMADDEN, INC	121791	100013075	27-Dec-24	220,371.28	PS-INV106394	31-Oct-24	EE	Sep-24	65,245.00
SCOTTMADDEN, INC	121791	100014012	28-Feb-25	1,149,375.29	PS-INV106841	31-Dec-24	EE	Oct-24	59,425.00
SCOTTMADDEN, INC	121791	100014012	28-Feb-25	1,149,375.29	PS-INV106851	30-Dec-24	EE	Nov-24	71,315.00
SCOTTMADDEN, INC	121791	100014348	28-Mar-25	437,486.52	PS-INV107007	31-Jan-25	EE	Dec-24	72,930.00
SCOTTMADDEN, INC	121791	100014904	23-May-25	235,203.82	PS-INV107288	24-Mar-25	EE	Jul-24	232,067.17
SCOTTMADDEN, INC	121791	100014904	23-May-25	235,203.82	PS-INV107317	24-Mar-25	EE	Feb-25	1,711.43
SCOTTMADDEN, INC	121791	100015329	27-Jun-25	45,193.36	PS-INV107737	30-May-25	EE	Jan-25	45,193.36
									850,281.45
FACTURAS EN AGING									
BANK	INV DATE	CREA	SUPPLIER	SUP	TYPE	INVOICE NUM.	Type of Program	PAY	TOTAL
	29-May-25	9-Jun-25	SCOTTMADDEN, INC	121791	SERVICIOS	PS-INV107690	EE	EFT	64,750.00
	12-Jun-25	18-Jun-25	SCOTTMADDEN, INC	121791	SERVICIOS	PS-INV107748	EE	EFT	42,423.05
	12-Jun-25	18-Jun-25	SCOTTMADDEN, INC	121791	SERVICIOS	PS-INV107749	EE	EFT	238,858.48
									346,031.53
								Total	1,196,312.98

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[REDACTED]

From: [REDACTED]
Sent: Wednesday, March 12, 2025 1:58 PM
To: [REDACTED]
Subject: FW: Movimiento de Fondos para Programa Energy Efficiency
Attachments: 20240611 MI20200001 Resolucion y Orden Factores Ajuste Anual.pdf; Facturas.zip; LUMA RI PY2 Pre-Fund Incentive Invoice 8 2.21.2025.pdf

FYI.

Me llamas al [REDACTED]

Thks

From: [REDACTED]
Sent: Tuesday, February 11, 2025 5:52 PM
To: [REDACTED]
Subject: Movimiento de Fondos para Programa Energy Efficiency

Saludos [REDACTED]:

Por la siguiente notifico las facturas pendientes relacionadas al Programa de Energy Efficiency.

Este programa esta incluido como ajuste a la tarifa de los clientes efectivo Julio 2024.

IV. Resumen de las Cláusulas de Ajuste

Luego de evaluar los documentos presentados por LUMA, el Negociado de Energía **APRUEBA** los siguientes factores anuales a ser implementados como parte de la Tarifa Permanente de la Autoridad a partir de 1 de julio de 2024.

Factores Anuales

Cláusula de Ajuste	Factor (\$/kWh)	Fechas de Efectividad
CILTA	0.003755	1 de julio de 2024 – 30 de junio de 2025
SUBA-HH	0.010847	1 de julio de 2024 – 30 de junio de 2025
SUBA-NHH	0.000916	1 de julio de 2024 – 30 de junio de 2025
EE	0.000853	1 de julio de 2024 – 30 de junio de 2025

Los factores anuales entran en vigor el 1 de julio de 2024 y permanecerán vigentes hasta el 30 de junio de 2025.

Por este medio solicitamos autorización para mover los fondos necesarios para el pago estas facturas.

Los fondos serian movidos de la cuenta de [REDACTED] @ [REDACTED].

Adjunto facturas y contrato

Cualquier duda me dejás saber.

Gracias

SCOTTMADDEN INVOICES NOT PAID	
PS-INV106839 OCT. CBES(1) SM hours	\$ 72,935.00
PS-INV106838 SEPT. CBES(2)	\$ 64,417.50
PS-INV106837 SERVICES CBES/DR SUB.AUGUST 2024	\$ 84,202.50
PS-INV106836 SERVICES CBES SUB. JULY 2024	\$ 38,987.50
PS-INV105925 MAY SERV. EE/DR SUBC. (RI/DR)	\$ 371,769.51
PS-INV105908 APR. SERVIC. SUBC. EE	\$ 230,257.82
PS-INV105203 FEBR. EE	\$ 1,068.55
PS-INV106388 JULY EE/DR SUBC. (RI/NS)	\$ 149,535.17

\$ 1,013,173.55

Los