

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

NEPR

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

CASE NO.: NEPR-AP-2023-0004

SUBJECT: Informative Motion on Recently
Discovered Issues as to the Scenarios Filed as
Part of the 2025 IRP

**INFORMATIVE MOTION ON RECENTLY DISCOVERED ISSUES AS TO THE
SCENARIOS FILED AS PART OF THE 2025 IRP**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On February 13, 2026, the Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order deeming LUMA’s 2025 IRP filing complete for meeting Regulation 9021 requirements (“February 13th Order”). However, the Energy Bureau determined that it required additional material from LUMA to ensure a comprehensive record for the ongoing review of the 2025 IRP and LUMA’s proposed Preferred Resource Plan (“PRP”). Accordingly, the Energy Bureau directed LUMA to submit the information required in Appendix A of the February 13 Order within the next fifteen business days.

2. On March 9, 2026, LUMA filed a *Motion Submitting Responses to Further Requests for Information in Compliance with Resolution and Order of February 13, 2026, Request for Confidential Treatment, and Memorandum in Support of Confidentiality*. LUMA submitted its responses to the requests for information included in the February 13th Order.

3. LUMA hereby informs the Energy Bureau that, in the course of preparing responses for the requests for information included in the February 13th Order, it uncovered four modeling issues with the scenarios filed as part of the 2025 IRP. Three of the four issues are common to all 17 scenarios. None of the issues is expected to impact, individually or collectively, the selection of LUMA's PRP or the relative ranking of the scenarios presented in the 2025 IRP. The fourth item relates specifically to Scenario 14. While this item could affect Supplemental Scenario 14 ranking relative to the other scenarios, it would not change the PRP selection.

4. The first issue of four relates to a confirmed PLEXOS® software bug regarding units scheduled to come into service in the middle of a year. This impacts Energiza and Genera Peaking generators with a mid-year commercial operation date. PLEXOS® adds these generators earlier than intended in their first year of operation, resulting in incorrect generation and costs for the months prior to their intended operation date. This software bug affects only Energiza and the Genera Peaking generators in their first year of operation, and only for the months prior to the intended first month of operation, over a study horizon of twenty years.

5. The second issue of four relates to the fixed operations and maintenance ("FOM") costs for certain generators. Due to an issue with the PLEXOS® setup, the update to FOM for the generic expansion units, if and/or when converted to biodiesel, was not included in PLEXOS®, resulting in lower-than-intended FOM costs for this subset of generation. Tests have been performed to confirm that including the corrected FOM costs does not impact the PRP; it still relies on thermal generation, a transition to biodiesel to meet the Renewable Portfolio Standard ("RPS"), and the relative ranking of the scenarios is not anticipated to change.

6. The third issue of four relates to variable operations and maintenance ("VOM") and FOM costs inputs to PLEXOS® for tranche projects. Some of these projects included duplicate

VOM and FOM cost components. This issue occurred across all scenarios, and when corrected, the present value revenue requirement (“PVRR”) was reduced by the same amount across all scenarios.

7. Finally, the fourth issue of four is apparent in all of the scenarios. A workaround for a PLEXOS® software bug was used to correctly account for Energiza’s fixed costs. This workaround was inadvertently left in the Scenario 14 results. When corrected, it will lower the PVRR for Scenario 14 and will have no impact on any other scenario.

8. LUMA provides the aforementioned information for transparency purposes. Although the above-described items will not impact the selection of LUMA’s PRP or the relative ranking of the scenarios presented in the 2025 IRP, LUMA is prepared to submit the relevant information and/or documentation described above at the request of the Energy Bureau.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to the Puerto Rico Electric Power Authority: Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record, Natalia Zayas Godoy, nzayas@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net, and Mirelis Valle Cancel, mvalle@gmlex.net, and Genera PR, LLC, through its attorney of record Luis R. Román Negrón, lrn@roman-negrom.com.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on March 17, 2026.



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