

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

**IN RE: ENERGY EFFICIENCY AND DEMAND
RESPONSE THREE YEAR PLAN**

CASE NO: NEPR-MI-2026-0002

**SUBJECT: 2026-2028 EE and DR Three Year
Plan Requirements of Information.**

RESOLUTION AND ORDER

On March 2, 2026, LUMA¹ filed a *Motion to Submit the Three-Year EE and DR Plan* ("March 2 Motion"), in which LUMA submitted its Three-Year Plan for Energy Efficiency and Demand Response ("TYP") covering the two-year period from July 1, 2026 through June 30, 2028.

Jmr On March 4, 2026, the Energy Bureau issued a Resolution and Order initiating the current proceeding for the review of the 2026-2028 TYP and establishing a procedural calendar. The Energy Bureau scheduled a technical workshop and established deadlines for stakeholders to submit comments and reply comments.

JMS On March 17, 2027, the Energy Bureau held a virtual technical workshop. LUMA gave a presentation on its TYP and answered questions from the Energy Bureau and stakeholders.²

To facilitate its review of the TYP, the Energy Bureau requires LUMA to submit additional information on its plan. The Energy Bureau **ORDERS** LUMA to respond to the Requirements of Information (ROIs) in Attachment A **within fourteen (14) calendar days** of notification of this Resolution and Order.

SMN
one Per Section 4.02 (D)(6) of the EE Regulation³ LUMA is required to propose a performance incentive within the Three-Year Plan. Additionally, in its January 26, 2024, Final Resolution and Order in *In Re: Performance Targets for LUMA Energy Servco, LLC*, Case No. NEPR-AP-2020-0025, the Energy Bureau determined the share of total incentive base points to be allocated to Energy Efficiency and Demand Response but did not establish the performance metrics or associated targets. Rather, the Energy Bureau ordered LUMA to propose performance metrics and associated targets that adhere to the EE Regulation as part of its Three-Year Plan. The Energy Bureau **ORDERS** LUMA to submit a proposal for performance incentive metric(s) and associated target(s) for its TYP **within fourteen (14) calendar days** of notification of this Resolution and Order.

[Handwritten mark] Section 4.02 B) of the EE Regulation requires each three-year plan to include a projected plan for EE resource acquisition illustrating how the statutory goal of 30% saving by 2040 will be achieved, and providing estimated total funding required for each year. The Energy Bureau **ORDERS** LUMA to submit its proposed plan to achieve the 2040 goal consistent with the EE Regulation **within fourteen (14) calendar days** of notification of this Resolution and Order.

Be it notified and published.

¹ LUMA Energy LLC and LUMA Energy ServCo LLC (jointly referred as, "LUMA").

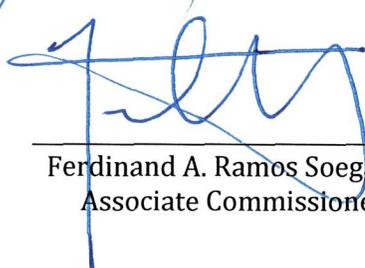
² On March 16, 2026, LUMA submitted via motion its presentation for the March 17, 2026 technical workshop.

³ Regulation No. 9367. Regulation for Energy Efficiency.




Edison Avilés Deliz
Chairman


Lillian Mateo Santos
Associate Commissioner


Ferdinand A. Ramos Soegaard
Associate Commissioner


Sylvia B. Ugarte Araujo
Associate Commissioner


Antonio Torres Miranda
Associate Commissioner

CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on March 24, 2026. I also certify that on March 24, 2026 I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau and a copy was notified by electronic mail to RegulatoryPREBorders@lumapr.com; katuska.bolanos-lugo@us.dlapiper.com; margarita.mercado@us.dlapiper.com; laura.rozas@us.dlapiper.com; alexis.rivera@prepa.pr.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net, hriviera@jrsp.pr.gov; javrua@sesapr.org; mrios@arroyorioslaw.com; jordgraham@tesla.com; forest@cleanenergy.org; pjcleanenergy@gmail.com; agraitfe@agraitlawpr.com, info@sesapr.org; cfl@mcvpr.com; mqs@mcvpr.com.

I sign this in San Juan, Puerto Rico, today March 24, 2026.


Sonia Seda Gaztambide
Clerk



Attachment A. Requirements of Information

Budget and cost recovery

1. What is the status of LUMA's efforts to restart the TPP programs after program implementation was stalled due to funding constraints? In addition, explain whether and how this impacts LUMA's ability to begin the TYP programs on schedule.
2. LUMA's approved budget for FY26 is about \$16 million. Does LUMA anticipate it will be able to spend its full FY26 budget within the FY26 period? Explain why or why not.
3. Referring to pages 20-21 of the TYP, please explain the following related to budget development.
 - a. Explain how LUMA determined the annual budget for EE programs.
 - b. Explain how LUMA developed the budgets for each customer sector and program.
 - c. Explain how LUMA determined the amount to spend on incentive costs versus PP&A costs.
4. Referring to page 52 of the TYP, please provide average monthly customer rate and bill impacts for the proposed EE rider for each year of the plan. Provide the impacts separately for residential and commercial and industrial customers.
5. Referring to page 3 of the TYP, please explain the following regarding low-income spending.
 - a. In its reporting, will LUMA be able to track and report on the total amount spent on low-income customers across all programs?
 - b. LUMA states it is "confident that the EE Regulation requirement for 25% of overall spending be for dedicated Low-Income customers can be met in the next Three-Year Plan with additional programs targeting Low-Income customers." Explain the programs LUMA envisions for the next plan, and why it cannot implement those programs now.
6. Referring to page 32 of the TYP, please explain the following related to the streetlighting conversion program.
 - c. Explain whether the streetlighting conversion program is entirely funded through the \$1.2 billion FEMA-funded program, or whether LUMA proposes to use EE rider funding to cover any portion of this program.
 - d. Explain whether the federal funding is firm, or whether there is risk that the funding may not come through to LUMA.
 - e. Explain how LUMA would proceed with the streetlighting conversion program if federal funding does not materialize.
 - f. How many streetlights has LUMA already repaired or replaced? How many cumulative conversions does LUMA anticipate completing by the end of the TYP? In response, provide both (1) the number of streetlights and (2) streetlights as a percentage of total streetlights.
 - g. Refer to Section 4.08 B) of the EE Regulation. When does LUMA anticipate achieving 100% streetlight conversion?
7. Referring to EE regulation Section 4.05 F), what steps has LUMA taken to secure outside funding?

Savings and benefits

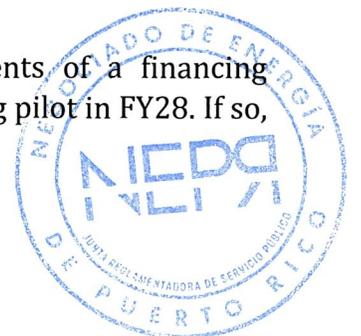
8. Provide the Puerto-Rico Cost Tool populated with all of the measure detail and assumptions LUMA used to develop the Plan.



9. Provide a table with LUMA's estimated savings broken into gross energy (kWh), net energy (kWh), gross demand (kW), net demand (kW), and net-to-gross ratios (NTG, in %) for each program and for each year of the plan.
10. LUMA proposed to apply fixed NTG ratios for each program. For each program, explain how the NTG ratio was determined.
 - a. Explain how LUMA determined the NTG ratios for each program.
 - b. Explain how LUMA's proposed NTG values compare to similar programs in other jurisdictions.
 - c. Provide any evaluation studies used to inform LUMA's proposed NTG ratios.
11. Referring to the Potential Study at page vi, the study indicates LUMA's program achievable savings are 186,600 MWh in FY2027. Referring to the TYP at page 21, LUMA proposes gross savings of approximately 36,500 MWh in FY2027. Explain why LUMA's proposed savings are only 20 percent of the potential study's estimated program achievable savings.

Program design

12. The program descriptions within the TYP indicate example measures for each program (see, e.g., Table 12).
 - a. For each EE program, provide the full list of measures LUMA proposes to offer to customers.
 - b. For each measure, provide the per-unit annual energy savings (kWh), lifetime energy savings (kWh), demand savings (kW), and incentive offered (\$).
 - c. As part of the response, highlight measure changes from the TPP, including measures that are new to the TYP and measures that LUMA is no longer offering.
13. Regarding financing programs, please explain the following.
 - a. Explain the types of financing programs LUMA considered in developing its plan (e.g., Pay-as-you-save, on-bill tariff, low-interest loans).
 - b. Explain whether LUMA contemplated financing programs for C&I customers specifically.
 - c. Explain how financing programs could interact with incentive-based programs.
14. Referring to page 3 of the plan, LUMA states it proposed "a Pay as You Save (PAYS) finance offering; however, LUMA has determined that implementing a financing-based program during this Plan period is not feasible given the time and resources required to establish financing partnerships, customer protections, and administrative processes."
 - a. Identify the time and resources required to establish financing partnerships, customer protections, and administrative processes. As part of the response, estimate the costs required for each element of a financing-based program.
 - b. Explain why it is not feasible to establish these elements during this TYP.
 - c. Explain whether LUMA could begin establishing some or all of these elements in this TYP, such that LUMA could start a financing-based program at the beginning of the next TYP. If so, identify the specific steps and associated costs that LUMA could take in this TYP.
 - d. Explain whether LUMA could establish enough elements of a financing program during FY27 such that it could launch a financing pilot in FY28. If so,



identify the specific steps that LUMA could take in this TYP and associated cost impacts.

15. Referring to page 23 of the plan, explain why the In-Store Discounts program will not be at "Full Speed" in FY28.
16. Referring to page 12 of the TYP, besides CBES, what other demand response programs did LUMA consider when developing the TYP? As part of the response, explain why LUMA is not proposing to implement any other demand response or pilot programs during the TYP.
17. Please provide a status update for the Emergency Load Reduction Program (ELRP) and LUMA's expectations for the ELRP for the TYP.
18. For the Residential Rebates program, explain how LUMA will balance available budget with customer demand for the program. As part of the response, explain how LUMA would proceed if customer demand exceeds the budget, including when LUMA would notify PREB and stakeholders and whether LUMA would shut down the programs.
19. Referring to page 26 of the TYP, please explain the following regarding the online rebate portal.
 - a. What is the status and timeline for launching the online rebate portal?
 - b. Explain what information will be available on the portal.
 - c. Explain whether the rebate portal could eventually indicate close to real-time data, such the status of the program's budget availability and the average wait time for a customer to receive an incentive.
20. Referring to page 26 of the TYP, please explain the Low-Income Assistance Initiative.
21. For each program in the TYP, explain how LUMA determined the incentive levels to offer customers. As part of the response, explain whether LUMA applied any lessons learned from implementing the TPP that it applied in determining the TYP incentive levels. If so, explain the specific lessons learned and how they informed the TYP incentives.
22. For each program in the TYP, explain how LUMA accounted for the potential study findings when designing the program.

CBES program

23. Provide LUMA's planning assumptions for the CBES program, including:
 - a. Number of customers enrolled (broken out by auto-enrolled and opt-in)
 - b. Number and duration of events, by month
 - c. Total kWh per event
 - d. Participation rate
 - e. Average reserve level
 - f. Administrative cost assumptions, broken out by cost category
 - g. Incentive costs
 - h. Total budget
 - i. Any other planning key planning assumptions
24. Why does LUMA expect administrative costs for the CBS program to increase from the \$1.5 million budgeted in FY26 to the \$4.9 million budgeted in FY27?
25. What changes or improvements does LUMA anticipate making to the CBES program in FY27-FY28?



26. Has LUMA tested the CBES program for cost-effectiveness based on the Puerto Rico Cost Test?

Evaluation and reporting

27. Refer to Appendix A (pages 40-42) of the TYP. Explain how LUMA envisions collaborating with the Energy Bureau to carry out the proposed EM&V schedule and plan.

28. Per the EE Regulation, the Energy Bureau must develop, or hire experts to develop, a Technical Reference Manual (TRM).

- a. Explain how LUMA envisions collaborating with the Energy Bureau to develop a TRM.
- b. Is development of a TRM part of LUMA's proposed EM&V plan?
- c. Has LUMA already developed assumptions that can be used in the development of a TRM?

29. Provide an updated EM&V schedule that includes the development of a Market Baseline Potential Study and a TRM.

30. Referring to Section 8 of the TYP on Reporting, indicate whether LUMA is proposing any notable changes from the TPP reports it prepares. Explain LUMA's rationale for any such changes.

31. Referring to page 39 of the TYP, provide more information on LUMA's expectations for the annual plan revisions.

- a. What level of information does LUMA expect to include in the annual updates?

TYP development

32. Please provide the October 1, 2025 draft TYP. Explain at a high level the changes LUMA made between the October 1 plan and the plan ultimately filed with the PREB, and why LUMA made those changes.

