

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

NEPR Received: Mar 30, 2026 6:36 PM
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IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: Motion Submitting Responses
to Requests for Clarification regarding
Revenue Requirement

**MOTION SUBMITTING RESPONSES TO REQUESTS FOR CLARIFICATION
REGARDING REVENUE REQUIREMENT**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU, AND ITS HEARING
EXAMINER, MR. SCOTT HEMPLING:**

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

1. On March 26, 2026, the Hearing Examiner, Mr. Scott Hempling, and Energy Bureau Consultant, Ms. Kate Bailey sent LUMA requests for clarification regarding the March 25, 2026 update (“March 25th filing”) to the revenue requirement that was filed by LUMA on March 17, 2026 (“March 17th filing”). LUMA hereby provides the attached documents with the aim of clarifying the record. *See Attachment 1 and Attachment 2*, as described below.

2. On March 26, 2026, Ms. Bailey sent an email to counsel for LUMA requesting that LUMA “file the revised Exhibit A so that LUMA Ex[.] 1106 can be replaced with the version that contains all corrected information.” In response to Ms. Bailey’s request, LUMA hereby submits revised Revenue Requirement Schedules, as Attachment 1 hereto.

3. Moreover, on that same date, the Hearing Examiner sent a second email to counsel for LUMA expounding upon the referenced request:

I need to know the new numbers for ‘Other Income.’ Your Exh A from March 17 had these numbers (which included the \$27M adjustment): \$84,404,402 (FY26),

\$87,341,675 (FY27), and \$90,381,165 (FY28). So I need two things: A revised Tab B-7 (preferably in Word so that I can just slot it into a Word doc) [and] The new totals for Other Income. Btw Tab B-7 would be more useful if somewhere it showed the \$27M adjustments and the new Other Income totals.

4. In response to the Hearing Examiner’s request, LUMA hereby submits a revised version of Tab B-7 in both Word and Excel formats. See Attachment 2.

5. Attachment 1 shows the \$3,107,253 adjustment to the TPA revenues (\$3,500,000 minus the prior amount included of \$392,748, resulting in a difference of \$3,107,253) per year, as discussed in the March 17th filing, as shown in the Table below:

LUMA’s Updates to Revenue Requirement Other Income - Third Party Attachments (“TPA”)

(A)	(B)	(C)	(D)	(E)	(F)
<i>C-2 Optimal & C-2 Constrained</i>	7	2026	Other Income	3,107,253	Update to Third Party Attachment Income
<i>C-2 Optimal & C-2 Constrained</i>	7	2027	Other Income	3,107,253	Update to Third Party Attachment Income
<i>C-2 Optimal & C-2 Constrained</i>	7	2028	Other Income	3,081,069	Update to Third Party Attachment Income

6. These corrections are shown in Attachment 1 on Tab C-2 Optimal, Column N, entitled “System Adjustments,” Line No. 8, which for FY2026 shows an adjustment of \$31,010,394. This adjustment reflects the \$27,903,141 “Other Cost Recovery Income Directly Allocated” (*see Attachment 2*, Row 9) plus the \$3,500,000 updated Third-Party Attachments (*see Attachment 2*, Column F, Row 3) minus the \$392,748 Third-Party Attachment. *See Attachment 1*, Tab C-2 Optimal, Column N, “System Adjustments,” Line No. 8. Because these changes are made in Attachment 1, Tab C-2 Optimal as adjustments, they roll up to Attachment 1, Tabs B-1 and B-2 for Optimal and Constrained Budgets. For example, Tab B-1 Optimal reflects the adjustment on Column H, Line No. 26, “Subtotal Revenue and Other Income,” showing the adjustment of \$31,010,394.

7. Attachment 2 also sets forth the numbers for Other Income, and the Total Other Income (Row 10) for FY2026 of \$87,511,454, FY2027 of \$90,448,721 and FY2028 of \$93,464,020.

WHEREFORE, LUMA respectfully requests that the Energy Bureau and its Hearing Examiner **take notice** of the aforementioned.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of March, 2026.

WE HEREBY CERTIFY that this document was filed using the electronic filing system of this Energy Bureau and that electronic copies of this document will be served onto the following mailing list: mvalle@gmlex.net; alexis.rivera@prepa.pr.gov; jmartinez@gmlex.net; jgonzalez@gmlex.net; nzayas@gmlex.net; Gerard.Gil@ankura.com; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; mdiconza@omm.com; golivera@omm.com; pfriedman@omm.com; msyassin@omm.com; regulatory@genera-pr.com; legal@genera-pr.com; mvazquez@vvlawpr.com; gvilanova@vvlawpr.com; dbilloch@vvlawpr.com; ratecase@genera-pr.com; jfr@sbgblaw.com; hriviera@jrsp.pr.gov; gerardo_cosme@solartekpr.net; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com; Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidehouse.com; Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; alexis.ramsey@weil.com; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; luis@emmanuelli.law; varoon.sachdev@whitecase.com; javrua@sesapr.org; agraitfe@agraitlawpr.com; jpouroman@outlook.com; epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; Robert.berezin@weil.com; Gabriel.morgan@weil.com; corey.brady@weil.com; lindsay.greenbaum@analysisgroup.com; harrison.holtz@analysisgroup.com; charles.wu@analysisgroup.com; Brian.Gorin@analysisgroup.com; Bhumika.Sharma@analysisgroup.com; Rachel.Anderson@analysisgroup.com; lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; isaac.glassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; hburgos@cabprlaw.com; dperez@cabprlaw.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; zack.schrieber@cwt.com; thomas.curtin@cwt.com; escalera@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; David.herman@dechert.com; Isaac.Stevens@dechert.com; James.Moser@dechert.com; michael.doluisio@dechert.com; Kayla.Yoon@dechert.com; mfb@tcm.law; lft@tcm.law; arosenberg@paulweiss.com; pbrachman@paulweiss.com; swintner@paulweiss.com;

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Attachment 1
[revised Revenue Requirement Schedules]
To be filed separately via email

Attachment 2
[revised *Tab B-7* – Word and Excel formats]
To be filed separately via email