

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

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

CASE NO.: NEPR-MI-2026-0002

SUBJECT: Motion in Support of LUMA's Motion to Request; Extension to Comply with Resolution and Order of March 24, 2026

**MOTION IN SUPPORT OF LUMA'S MOTION TO REQUEST EXTENSION
TO COMPLY WITH RESOLUTION AND ORDER OF MARCH 24, 2026**

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, the Solar and Energy Storage Association of Puerto Rico ("SESA") by and through undersigned counsel, and respectfully states as follows:

I. INTRODUCTION

1. SESA respectfully appears before this Honorable Bureau in support of LUMA Energy, LLC and LUMA Energy ServCo, LLC's ("LUMA") *Motion to Request Extension to Comply with Resolution and Order* of March 24, 2026. As set forth by LUMA, the March 24, 2026 Resolution and Order requires LUMA to submit, by April 7, 2026, responses to the Requirements of Information included in Attachment A, a proposal for performance incentive metrics and associated targets for the Three-Year Plan, and a proposed plan to achieve the 2040 goal of 30% savings.

2. LUMA further explains that the ROIs consist of thirty-two numbered items, some of which contain more than one question or request, for a total of roughly more than fifty items to address. LUMA has therefore requested a limited extension until April 20, 2026, and has proposed that the April 28, 2026 deadline be made available for stakeholder comments.

3. SESA supports this request. The extension sought is limited, reasonable, and directed toward ensuring that the information submitted to the Bureau is complete, methodologically sound, and useful to both the Bureau and stakeholders in their review of the Three-Year Plan. SESA further

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agrees that adjusting the procedural schedule as requested would better enable meaningful stakeholder participation, particularly where stakeholders would benefit from reviewing LUMA's fuller April 20 filing before submitting comments.

II. DISCUSSION

A. THE REQUESTED EXTENSION IS REASONABLE AND LIMITED

4. LUMA does not seek an open-ended delay, but rather a short extension from April 7, 2026 to April 20, 2026 to comply with the Bureau's March 24, 2026 Resolution and Order. That request is very reasonable in light of the scope of the Bureau's directives. As LUMA explained, it must respond not only to numerous ROI items, but also prepare substantive proposals concerning performance incentive metrics and a plan to achieve the 2040 goal of 30% savings.

B. GRANTING THE EXTENSION WILL PROMOTE A MORE MEANINGFUL AND INFORMED STAKEHOLDER PROCESS

5. SESA also agrees with LUMA that the requested schedule adjustment would improve the quality of stakeholder participation. LUMA has proposed that the April 28, 2026 date be made available for stakeholder comments so that parties may review LUMA's April 20 filing before commenting. That proposal is sensible. Stakeholders are in a better position to provide useful and informed input when they have access to LUMA's complete responses and supporting proposals. Allowing comments to be informed by that filing will strengthen the record before the Bureau and facilitate a more meaningful review process for all concerned.

C. THE REQUESTED RELIEF WILL NOT PREJUDICE THE PARTIES OR DISRUPT IMPLEMENTATION OF THE THREE-YEAR PLAN

6. LUMA expressly represents that the requested extension is limited, made in good faith, and not intended to cause unnecessary delay. LUMA further states that the proposed changes would not impact the overall schedule for implementation of the Three-Year Plan. SESA is aware of no prejudice that would result from granting the requested relief. To the contrary, the requested extension would improve the administrative record while preserving the broader implementation timeline. Under these circumstances, granting the motion would serve administrative fairness, support a fuller record, and assist both the Bureau and stakeholders in evaluating the Three-Year Plan on a sound basis.

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WHEREFORE SESA respectfully requests that the Energy Bureau:

1. Grant LUMA's Motion to Request Extension to Comply with Resolution and Order of March 24, 2026;
2. Extend LUMA's deadline to comply with the March 24, 2026 Resolution and Order until April 20, 2026; and
3. Make April 28, 2026 available for stakeholder comments, as proposed by LUMA.

Respectfully submitted on March 31, 2026, in San Juan, Puerto Rico.

I HEREBY CERTIFY that this motion was filed using the Energy Bureau's electronic filing system and that electronic copies of this motion will be notified to the parties of record, including: alexis.rivera@prepa.pr.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; hriviera@jrsp.pr.gov; mrios@arroyorioslaw.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; pjcleanenergy@gmail.com; agraitfe@agraitlawpr.com; info@sesapr.org; cfl@mcvpr.com; and mqs@mcvpr.com.

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