

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

<b>NEPR</b>  <b>Received:</b>  <b>Apr 1, 2026</b>  <b>4:39 PM</b>
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**IN RE:** PROCESO PARA LA ADOPCIÓN DEL REGLAMENTO PARA LA AUTORIZACIÓN, SUPERVISIÓN Y REGULACIÓN DE LA PARTICIPACIÓN MUNICIPAL EN EL ALUMBRADO PÚBLICO CONECTADO AL SISTEMA ELÉCTRICO

**CASE NO.:** NEPR-MI-2026-0003

**SUBJECT:** Motion to Request Extension to Submit Comments on Draft Regulation

**MOTION TO REQUEST EXTENSION TO SUBMIT COMMENTS ON DRAFT  
REGULATION**

**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 March 26, 2026, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“March 26<sup>th</sup> Order”) informing that it had completed a draft of a “Regulation for the Authorization, Oversight, and Regulation of Municipal Participation in Public Lighting Connected to the Electric Grid” (“Draft Regulation”) and attached both Spanish and English versions of the Draft Regulation to the March 26<sup>th</sup> Order. In addition, the Energy Bureau ordered LUMA to submit its observations and/or comments, if any, to the Draft Regulation within ten (10) days, which would occur prior to the Energy Bureau’s adoption of the final text of the proposed regulation that would be subject to the

rulemaking process under Act 38-2017, known as the “Uniform Administrative Procedure Act of the Government of Puerto Rico”.

2. LUMA hereby informs that LUMA is reviewing the Draft Regulation, and LUMA intends to submit comments on it. LUMA notes that the Draft Regulation is a 28-page document containing provisions regarding multiple and varied subjects, such as: regulatory authority and institutional coordination, including matters arising under the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement; the minimum contractual provisions to be included in agreements with Municipalities; compliance with Federal Funding requirements; types of municipal interventions affecting street lighting systems; the classification of and technical requirements and standards applicable to street lighting systems; personnel certification and training requirements; and liability, insurance and indemnification provisions, among others. Hence, the Draft Regulation covers important and varied legal, contractual and technical subjects affecting street lighting systems and the Puerto Rico Transmission and Distribution System. Given the number and interdisciplinary nature of the subjects covered by the Draft Regulation, the review of this document requires the involvement of different LUMA departments (such as, Capital Programs and Engineering, Regulatory, Legal, Finance (Federal Funds Office and Risk Management, among others)). The legal/contractual aspect of the Draft Regulation in and of itself requires an in-depth and time-consuming analysis. The interceding holiday week, which occurs right before the week the comments would be due, presents a significant hurdle.

3. In light of the foregoing, LUMA respectfully submits that the ten (10)- day period provided to submit comments on the Draft Regulation is not sufficient for LUMA to effectively conduct the necessary internal coordination and analysis within LUMA to yield the thorough and thoughtful comments this regulation merits. Accordingly, LUMA respectfully requests that the

Energy Bureau extend the deadline for LUMA to submit comments to the Draft Regulation by an additional twenty (20) days, for a total of thirty (30) days from the March 26<sup>th</sup> Order- that is, by April 25, 2025.

4. It is respectfully informed that this request for extension is made in good faith and is not intended to cause unnecessary delay.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the foregoing and **grant** LUMA's request to extend the deadline for LUMA to submit comments on the Draft Regulation set forth in the Energy Bureau's March 26<sup>th</sup> Order by twenty (20) days, for a total of thirty (30) days from the March 26<sup>th</sup> Order, that is, by April 25, 2025.

**RESPECTFULLY SUBMITTED.**

In Guaynabo, Puerto Rico, this 1<sup>st</sup> day of April 2026.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau.



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