

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

NEPR Received: Apr 24, 2026 3:38 PM
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IN RE: PLAN PRIORITARIO PARA LA ESTABILIZACIÓN DE LA RED ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

SUBJECT: Urgent Request for Extension of Time to Submit the Comprehensive Transmission Plan

**URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT
THE COMPREHENSIVE TRANSMISSION PLAN**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

I. Relevant Procedural History/Background

1. On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“March 28th Resolution”) in which it approved the Electric System Priority Stabilization Plan (“PSP”) setting forth specified activities to be implemented by LUMA, Genera, LLC (“Genera”) and the Puerto Rico Electric Power Authority (“PREPA”) within the next two years. Among the activities to be implemented by LUMA was the development of a Transmission Plan (also referred to as a “Comprehensive Transmission Plan”) which the Energy Bureau indicated was needed to identify: (i) congestion points and bottlenecks that limit power flow; (ii) areas where grid flexibility and resilience are lacking, especially for hurricane-prone regions; (iii) strategic interconnections that can unlock low-cost, renewable-rich zones; (iv) investments in grid hardening and modernization, including smart

grid and digital controls; and (v) how to increase transmission system flexibility that allows for interconnection of different types of variable generation, even though the specific generation's characteristics may be unknown. *See* March 28th Resolution, pp. 9-10. The Energy Bureau also described this Comprehensive Transmission Plan as a “formal, long-range Transmission Plan [that] is critical to guide expansions, upgrades, and integration of new generation” and “must meet technical requirements established by the Energy Bureau, address N-1/G contingency reliability, incorporate distributed energy resources, and integrate anticipated renewable/battery capacity additions”. *See id.*, Attachment A, p. 20. The Energy Bureau established the deadline of April 30, 2026, for LUMA to submit the Comprehensive Transmission Plan. *Id.*, pp. 19-20.

2. On July 16, 2025, the Energy Bureau issued a Resolution and Order (“July 16th Order”) discussing the Comprehensive Transmission Plan, among other subjects. Specifically, the Energy Bureau addressed a request made by LUMA to submit the Comprehensive Transmission Plan alongside its next Integrated Resource Plan (“IRP”). *See* July 16th Order, p. 4. The Energy Bureau determined that these documents needed to be filed separately, explaining that “while an IRP can draw on transmission studies, the two documents pursue different- though complementary- goals”. *See id.* The Energy Bureau further explained that the typical focus of the IRP was “evaluating resource adequacy, charging emissions-reduction pathways, and identifying a cost-effective mix of generation resources” while that of a Transmission Plan was to “detail transmission system upgrades and expansions that (i) support system reliability and energy delivery, and (ii) provide contingency capabilities consistent with bulk-electric-system reliability standards”. *See id.* Hence, the Energy Bureau found that “folding the entire Transmission Plan into the IRP” was “premature” and ordered LUMA to file a “stand-alone Transmission Plan in this

docket [...] and reference its findings in the forthcoming IRP for context”. *See id.*, pp. 4-5 (emphasis omitted).

II. Request for Extension

3. LUMA respectfully informs that LUMA is diligently working to complete the Transmission Plan in accordance with the Energy Bureau requirements. However, despite its best efforts, and for the reasons set forth by LUMA in the attached *Exhibit 1*, discussed below, LUMA respectfully informs that it may not be able to complete the Transmission Plan in time for the April 30th deadline, and LUMA will require an extension of time, until June 1, 2026, to complete and file this Plan.

4. *Expanded Scope Resulting from Inclusion of 38 kV System.* The Comprehensive Transmission Plan draws from the Transmission Needs Study conducted by LUMA for the 2024 IRP filed in Case No. 2023-AP-0004, *In Re: Review of Puerto Electric Power Authority Integrated Resource Plan* (“IRP Case”). The 2024 IRP, with the exception of certain supplemental scenarios and the Transmission Needs Studies Report, was filed with the Energy Bureau on October 17, 2025. *See Motion Submitting 2025 IRP and Request for Confidential Treatment* filed in the IRP Case. The Transmission Needs Studies Report for the 2024 IRP was filed on November 21, 2025. *See Motion Submitting Transmission Needs Studies Report, Request for Confidential Treatment, And Memorandum in Support of Confidentiality* filed in the IRP Case. For the 2024 IRP, LUMA conducted a transmission PSS®E Analysis based on steady-state power-flow and contingency analysis to identify thermal overloads and voltage violations. *Exhibit 1*, p. 1. The results of that analysis focused on the 115 kV and 230 kV transmission backbone. *Id.* To prepare the Comprehensive Transmission Plan, the scope of the PSS®E Analysis was expanded to include the 38 kV transmission network system. *Id.* This change represents a substantial expansion in study

affecting all project workstreams, including (a) additional data collection across LUMA's operations, protection, and metering functions, as well as ensuring data completeness and accuracy as a prerequisite to initiating reliable modeling; and (b) the introduction of a significantly larger contingency set requiring individual simulation, review, and documentation. *See id.* Taken together, these factors represent an increase in the scope, complexity, and required effort of the plan in comparison to the Transmission Needs Studies Report. *Id.*

5. *Model Validation and Iterative Technical Analyses.* The preparation of the Comprehensive Transmission Plan requires extensive model validation efforts, particularly in connection with the PSS®E contingency files serving as the analytical foundation for the study. *Id.* Discrepancies identified during certain evaluations have required multiple iterative cycles of study execution, including the reassessment of critical scenarios such as 115/38 kV transformer replacements. *Id.* Additionally, the added consideration of 38 kV system introduced a larger set of network elements, operating conditions, and contingency scenarios that required full modeling and validation. *Id.* Each modeling iteration demands additional data integration to ensure that system models accurately reflect current system conditions across both voltage levels. *Id.*

6. *Mitigation Measures and Engineering Solutions.* After identifying overload conditions across the system, the team conducted an iterative engineering review to identify sound and practical mitigation measures. *Id.* It became clear that standard mitigation approaches were insufficient under certain system conditions, particularly under high-demand scenarios. *Id.* This finding required the evaluation of alternative solutions that demanded additional analytical work. *Id.*, pp. 1-2. The expansion of the study scope to include the 38 kV system introduced a new set of overloaded elements and thermally constrained facilities. *Id.*, p. 2. Therefore, additional time is

needed to ensure all recommended solutions are technically defensible, appropriately engineered and aligned with system needs. *Id.*

7. *Development of Cost Estimates for Recommended Solutions.* Concurrently with the technical analyses, detailed cost estimates are being developed for all recommended mitigation measures, including substation rebuilds and other capital improvements. *Id.* Several proposed solutions—particularly those involving substation-level rebuilds—require additional coordination among planning, engineering, and estimating functions to ensure that cost information is appropriately scoped, technically supported, and traceable to the underlying engineering recommendations. *Id.*

8. In sum, the factors discussed above have made the preparation of the Comprehensive Transmission Plan a more resource-intensive and time-consuming process. LUMA takes very seriously its responsibility to ensure the completeness of the Comprehensive Transmission Plan to be submitted. Having to file this Plan by April 30, 2026, significantly thwarts these efforts. Therefore, LUMA urgently and respectfully requests the Energy Bureau to extend the deadline to submit the Comprehensive Transmission Plan until June 1, 2026. This extension is limited in nature and strictly necessary to allow LUMA to complete this Plan in accordance with the applicable standards.

9. LUMA submits this request in good faith, without intending to cause undue delay, and for the purposes of treating each filing before the Energy Bureau with the time and attention it deserves.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the foregoing, **grant** this *Motion for Extension of Time to Submit the Transmission Plan* and accordingly **extend** the deadline to file the Transmission Line until June 1, 2026.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 24th day of April 2026.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified via email to PREPA, via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record Mirelis Valle Cancel, mvalle@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net and Natalia Zayas Godoy, nzayas@gmlex.net, and to Genera PR LLC, through its counsel of record Luis R. Roman-Negron, ln@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com.



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Exhibit 1

*LUMA's Discussion of Factors Affecting Timeline for Preparation of Comprehensive
Transmission Plan*

Factors Affecting Timeline for Completion of Comprehensive Transmission Plan

1.0 Introduction

LUMA discusses below the various factors affecting the timeline for LUMA to complete the Comprehensive Transmission Plan, currently due on April 30, 2026. These factors justify the need for additional time to ensure that the final submission meets the requirements and standards expected by the Puerto Rico Energy Bureau (Energy Bureau). LUMA understands that this effort may be completed for the Plan to be ready for filing by June 1, 2026.

2.0 Basis for Request

I. **Expanded Scope Resulting from Inclusion of the 38 kV System**

For the Comprehensive Transmission Plan, LUMA is expanding the scope of the PSS@E Analysis study performed (that is, the Transmission Needs Studies Report in the 2024 IRP) to include the 38 kV transmission network. For the 2024 IRP, LUMA conducted a transmission PSS@E Analysis based solely on steady-state power-flow and contingency analysis to identify thermal overloads and voltage violations. The results of that analysis focused on the 115 kV and 230 kV transmission backbone. The analysis conducted by LUMA, and to be included in the Comprehensive Transmission Plan, will represent a substantial expansion in study scope affecting all project workstreams. Additional data collection is required across operations, protection, and metering groups. Ensuring the completeness and accuracy of this data has been a prerequisite for reliable modeling.

Analytically, the 38 kV system introduces a significantly larger contingency set requiring individual simulation, review, and documentation. While the 38 kV and 115 kV networks are operationally interconnected, the relationship between them primarily requires confirming consistency across studies rather than modifying previously concluded results. This interconnection reduces opportunities for parallel work and increases the coordination effort needed between voltage levels. Taken together, these elements represent a material increase in scope, complexity, and workload.

II. **Model Validation and Iterative Technical Analyses**

The development of the Transmission Comprehensive Plan requires extensive model validation, particularly with respect to the PSS@E contingency files serving as the analytical basis for the study. During TARA-driven evaluations, several discrepancies were identified that necessitated multiple iterative cycles of study execution, including the reassessment of key scenarios such as 115/38 kV transformer replacements.

Furthermore, inclusion the 38 kV system introduced a significantly larger set of network elements, operating conditions, and contingency scenarios, each requiring full modeling and validation. Each iteration involves additional data integration to ensure that the system models reflect current operating conditions across both voltage levels.

III. **Mitigation Measures and Engineering Solutions**

The identification of system overloads triggered a detailed, iterative engineering review to determine technically sound and implementable mitigation measures. The team determined that standard approaches, such as the deployment of ACSR conductors, were insufficient under certain high-demand conditions. This required evaluation of alternative solutions, including the potential

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application of ACSS conductors and previously studied capacity upgrades, each of which required additional analytical validation.

The inclusion of the 38 kV system further expands the scope of required mitigation analysis by introducing new overloaded elements and thermally constrained facilities. Additional time is necessary to ensure that all recommended solutions are technically defensible, appropriately engineered, and aligned with system needs.

IV. Development of Cost Estimates for Recommended Solutions

In parallel with the technical analysis, detailed cost estimates are being developed for the full set of recommended mitigation measures, including substation rebuilds and related capital improvements. Several proposed solutions, particularly substation-level rebuilds, require enhanced coordination among planning, engineering, and estimating functions to ensure cost figures are appropriately scoped, technically supported, and traceable to the underlying engineering recommendations.