

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

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| NEPR |
| Received: |
| May 22, 2026 |
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IN RE:

CABLE TV POWER SUPPLIES FISCAL
YEARS 2027 AND 2028 RATES

CASE NO.: NEPR-MI-2026-0005

SUBJECT: LUMA's Urgent Request for
Clarification Regarding New CATV Rates

URGENT REQUEST FOR CLARIFICATION REGARDING NEW CATV RATES

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and LUMA Energy ServCo, LLC ("ServCo"), (jointly "LUMA"), and respectfully state and request the following:

1. On April 15, 2026, the Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a *Final Resolution and Order on Electricity Rates* ("Final Rate Order") in the matter of *In Re: Puerto Rico Electric Power Authority Rate Review*, case no. NEPR-AP-2023-0003.

2. As part of the revisions to the revenue allocation through rates, for fiscal year ("FY") 2027 and FY 2028 the rates applicable to CATV (Cable TV Power Supplies) service within the Small Commercial customer class were revised. *See* Final Rate Order, Appendixes A and B.

3. In preparation to implement the FY 2027 new rates, LUMA has noticed certain discrepancies in the prevailing cost assigned to the volumetric consumption component of the CATV tariffs for Fiscal Years 2027 and 2028, which materially affect the revenue allocation attributed to this component. The purpose of this motion is to seek urgent clarification from this Honorable Energy Bureau relating to these discrepancies. These discrepancies, discussed below, are analyzed and discussed in LUMA's Certified Technical Memorandum attached hereto as *Exhibit 1*.

4. The CATV rate applies to cable TV power supplies and is billed to cable TV companies for the energy supplied to their devices; it is composed of a fixed monthly customer charge and a volumetric consumption (hereafter “energy consumption” or “consumption”) charge that varies depending on the cable TV device.

5. For FY 2027, the Final Rate Order establishes the following CATV volumetric consumption rates: for 60-volt (“V”) units, a rate of \$93.00 per 656 kWh, which results in an energy consumption charge of \$0.14177 per kWh; for 90-V units, a rate of \$70.00 per 494 kWh, which results in an energy consumption charge of \$0.14170 per kWh; and, for any additional CATV unit with a different consumption level from the two preceding categories, a volumetric consumption charge of approximately \$0.15128 per kWh. *See id.*, Appendix B-3.

6. For FY 2028, the Final Rate Order establishes the following CATV volumetric consumption rates: for 60-V units, a rate of \$93.00 per 656 kWh, which results in an energy consumption charge of \$0.14177 per kWh; for 90-V units, a rate of \$70.00 per 494 kWh, which results in an energy consumption charge of \$0.14170 per kWh; and, for any additional CATV unit with a different consumption level from the two preceding categories, a volumetric consumption charge of approximately \$0.14232 per kWh. *See id.*

7. The FY 2027 and FY 2028 CATV volumetric energy consumption rates differ from the current FY 2026 CATV rates in a significant way. Under the FY 2026 rates, the volumetric energy consumption charge across all categories is constant: \$55.43 per 656 kWh for 60-V units, or approximately \$0.08449 per kWh; \$41.74 per 494 kWh for 90-V units, or approximately \$0.08449 per kWh; and \$0.08449 per kWh for units with a different consumption level. *See id.* Accordingly, LUMA’s CC&B system is currently programmed to determine the CATV energy charge based on the same volumetric energy consumption charge across the three categories. *See Exhibit 1*, p. 1.

8. By contrast, the FY 2027 and FY 2028 CATV volumetric energy consumption charge set forth in the Final Rate Order results in different per-kWh charges for each category. To implement this change, LUMA must make structural changes to the CC&B system so that different CATV volumetric consumption charges per kWh are established for each category before the FY 2027 rates enter into effect beginning on July 1, 2026, which would not be feasible within our current timeline. *See id.*, pp. 1-2.

9. Moreover, if the new FY 2027 and FY 2028 CATV volumetric energy consumption charges, as set forth in the Final Rate Order, and shown in incise (6) six, were to be implemented, the total approved revenue requirements allocated to the CATV class will result in a deficit resulting in lower billing than intended. *See id.*, p. 1.

10. Provided that, for FY 2027, the total revenues allocated to CATV from the consumption charges for the three categories is \$2,488,567, based on billing units totaling 16,450,000 kWh. *See* Final Rate Order, Appendix H, Consumer Analysis Tab. To meet that allocation, a rate of approximately \$0.15128 per kWh would have to be applied across the board, and the 60-V and 90-V rates would have to be set at approximately \$99.24013 per 656 kWh and \$74.73266 per 494 kWh, respectively, rather than the \$93.00 and \$70.00 amounts set forth in the Final Rate Order. *See Exhibit 1*, p. 1.

11. LUMA's analysis is equally true for FY 2028. If FY 2028 rates are implemented, as set forth in the Final Rate Order, the CATV revenues established by the Energy Bureau for FY 2028 will not be met as they currently stand, and the corresponding rate numbers may require clarification or correction. *See Exhibit 1*, p. 1.

12. Given the discrepancies noted above, and acknowledging the Energy Bureau's intention is to adopt rates that can be implemented through LUMA's existing rate structure (Final Rate Order,

Chapter Seven, p. 57, § XLVI (H)(6), ¶ 6), LUMA respectfully and urgently requests that the Energy Bureau confirm whether it was the Energy Bureau's intention to set the new CATV rates as reflected in the Final Rate Order or, in the alternative, whether the rate numbers should be corrected. LUMA must complete the CC&B system structural changes before the second week of June so that the FY 2027 CATV rates can be incorporated in the test runs for the new FY 2027 rates.

13. LUMA clarifies that it is not seeking reconsideration of the new CATV rates set forth in the Final Rate Order, but rather the urgent clarifications discussed above so that LUMA can timely implement the new CATV rate.

WHEREFORE, LUMA respectfully requests that this Energy Bureau **take notice** of the above; **issue**, on an urgent basis and by no later than May 29, 2026, the clarifications requested herein and indicate whether the CATV rates for FY 2027 and FY 2028 should be implemented as set forth in the Final Rate Order or corrected to align with the revenue allocation reflected therein; and **grant** any other relief that the Energy Bureau deems appropriate.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 22nd day of May 2026.



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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of May 2026, I filed the foregoing motion with the Clerk of the Puerto Rico Energy Bureau through the Bureau's electronic filing system. Respectfully submitted.

In Guaynabo, Puerto Rico, on the 22nd day of May 2026.

/s Katuska Bolaños Lugo
Katuska Bolaños Lugo

Exhibit 1

Technical Memorandum