

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

NEPR

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IN RE:
IN RE: REVISIÓN DEL PROGRAMA
COMPRENSIVO DE MANEJO DE
VEGETACIÓN DE LA AUTORIDAD DE
ENERGÍA ELÉCTRICA

CASE NO. NEPR-MI-2019-0005

**SUBJECT: Motion Reiterating LUMA's Request
to Stay the Monthly Reporting Cadence for
Vegetation Management Progress Reports**

**MOTION REITERATING LUMA'S REQUEST TO STAY THE MONTHLY
REPORTING CADENCE FOR VEGETATION MANAGEMENT PROGRESS
REPORTS**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as "LUMA"), through the undersigned legal counsel, respectfully submit the following:

1. On April 15, 2026, the Puerto Rico Energy Bureau ("Energy Bureau") issued a Final Resolution and Order on Electricity Rates ("Final Rate Order") in Case No. NEPR-AP-2023-0003, *In Re: Puerto Rico Electric Power Authority Rate Review* ("Rate Case Proceeding").
2. In Chapter Three, Part IX.F of the Final Rate Order, the Energy Bureau evaluated LUMA's Vegetation Management and Island-Wide Vegetation Clearing Implementation budget and determined that the Optimal Budget was necessary to satisfy the mandates of the Priority Stabilization Plan. In response to the Bondholders' executability concerns regarding municipal coordination, availability of qualified labor, and the proposed FY2026 ramp-up pace, the Energy Bureau imposed monthly and quarterly reporting requirements on LUMA. *See*, Final Rate Order, p. 176. Specifically, the Energy Bureau ordered LUMA to file in the present proceeding a new

report in the form of a monthly Progress Report beginning June 1, 2026, “in tabular and narrative form”, covering detailed vegetation management activity and metrics. *Id.*, p. 177-79.

3. On May 5, 2026, LUMA filed its Motion for Reconsideration of the Final Rate Order in the Rate Case Proceeding (“Motion for Reconsideration”). *See LUMA’s Motion for Consideration of Final Rate Order*. In what is pertinent to this motion, LUMA respectfully requested the Energy Bureau to reconsider the imposition of the monthly reporting requirement on vegetation management progress reports. *See Motion for Reconsideration*, pp. 46-50. LUMA’s general position is that the requirement of a monthly Progress Report creates an inconsistency with the governing Resolution and Order dated August 8, 2024 (“2024 Order”) issued in the present docket and imposes duplicative reporting on the same activities using substantively overlapping fields. *Id.*, p. 46. Therefore, LUMA requested the Energy Bureau to reconsider the new monthly requirement and reinstate a single, uniform quarterly filing in the present docket, consistent with the 2024 Order framework. *Id.*, p.47.

4. On May 13, 2026, the Energy Bureau issued a Resolution and Order (“May 13th Order”) to provide the reporting templates that LUMA shall use to comply with the filing requirements set forth in the Rate Case Order. As to the reporting requirements, the Energy Bureau ordered LUMA to:

- i. Beginning June 1, 2026, file monthly Vegetation Management Progress Reports using the templates provided in Attachment A of the May 13th Order, with the Transmission, Distribution, and Substation worksheets each populated in their entirety for every transmission line, primary distribution line, and substation addressed during the reporting month;
- ii. Include with each monthly Progress Report (i) a narrative summary describing progress against the approved annual mileage targets, cumulative deployment of approved O&M funding by district, and any obstacles encountered during the reporting period; and (ii) an island map depicting the lines, substations and rights-of-way being addressed;
- iii. Beginning July 1, 2026, file quarterly FEMA FAAS^t vegetation management program updates required by the Final Rate Order, including the number of Project

- Worksheets obligated, total funds disbursed, any obstacles to timely obligation and deployment, and the status of municipal coordination agreements for post-federal clearing maintenance; and
- iv. Submit each monthly Progress Report in both native spreadsheet format and PDF format, and the accompanying narrative and island map in PDF format.

Id., p.3. The Energy Bureau also stated that it expected LUMA’s full cooperation in accessing geospatial, asset management, and field inspection tools that LUMA uses to identify the locations of overhead transmission and distribution lines and their associated rights-of-way. *Id.*

5. On May 18, 2026, the Energy Bureau issued a Resolution and Order (“May 18th Order”) in the Rate Case Proceeding, whereby it recognized LUMA, PREPA, and Genera’s motions for reconsideration as proper submissions and took them under advisement. *See*, May 18th Order, p.2.

6. On May 20, 2026, LUMA filed a *Motion Requesting Stay of the Monthly Reporting Cadence for Vegetation Management Progress Reports as Established by May 13, 2026, Resolution and Order and the Final Resolution and Order on Electricity Rates* (“May 20th Motion”). Therein, LUMA respectfully requested the Energy Bureau to stay the portion of the May 13th Order requiring LUMA to file monthly Vegetation Management Progress Reports, until the Energy Bureau issues its order addressing LUMA’s concerns regarding monthly vegetation management reporting in the Rate Case Proceeding. Alternatively, LUMA requested the Energy Bureau to amend the quarterly template adopted in the 2024 Order to incorporate any new data elements identified in the Final Rate Order, while preserving the quarterly reporting cadence.

7. LUMA hereby respectfully reiterates its request, made in the May 20th Motion, to stay the portion of the May 13th Order requiring the filing of monthly Vegetation Management Progress Reports. As stated in the May 20th Motion, such stay should remain in place until the Energy Bureau issues its order addressing LUMA’s concerns regarding the monthly vegetation

management reporting the Rate Case Proceeding. LUMA also reiterates its alternative proposal. That is, that the Energy Bureau amend the quarterly template adopted in the 2024 Order to incorporate any new data elements identified in the Final Rate Order, while preserving the quarterly reporting cadence.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **stay** the portion of the May 13th Order requiring LUMA to file monthly Vegetation Management Progress Reports, until the Energy Bureau issues its order addressing LUMA's concerns regarding monthly vegetation management reporting in the Rate Case Proceeding. In the alternative, LUMA respectfully requests the Energy Bureau to **amend** the quarterly template adopted in the 2024 Order to incorporate any new data elements identified in the Final Rate Order, while maintaining the quarterly reporting cadence.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to PREPA via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record, Natalia Zayas Godoy, nzayas@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net, and Mirelis Valle Cancel, mvalle@gmlex.net, to Genera PR LLC, through its counsel of Jorge Fernández-Reboredo, jfr@sbgbllaw.com, Alejandro López Rodríguez, alopez@sbgbllaw.com, legal@genera-pr.com, regulatory@genera-pr.com.

In Guaynabo, Puerto Rico, this 26th day of June 2026.



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