

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

NEPR

Received:

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IN RE:

IMPLEMENTATION OF 2026'S
APPROVED PERMANENT RATE

CASE NO.: NEPR-MI-2026-0005

SUBJECT: LUMA's Motion to Submit
Municipalities' CILT Consumption Report in
Compliance with Final Rate Order and to Inform
the Methodology for the Report Due on October 1,
2026

**MOTION TO SUBMIT MUNICIPALITIES' CILT CONSUMPTION REPORT IN
COMPLIANCE WITH FINAL RATE ORDER AND TO INFORM THE
METHODOLOGY FOR THE REPORT DUE ON OCTOBER 1, 2026**

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. The Final Rate Order includes multiple orders, including for LUMA to "[n]o later than July 1, 2026 ... identify which of the 70 municipalities in Puerto Rico may be exceeding their electric usage that is covered by CILT, which should be billed to and collected from those municipalities." Final Rate Order, Chapter VIII, p. 14.
3. LUMA's report submitted in compliance with the foregoing directive is attached hereto as **Exhibit 1**.
4. The Final Rate Order also directs LUMA to "[n]o later than October 1, 2026 ... identify the top ten municipalities which could be exceeding their CILT-covered electricity use."

Id. LUMA herein informs the Energy Bureau of the quantitative method it will follow to present the conclusions in the report to be presented by October 1, 2026. *See* Exhibit 1 at pp. 1-2. The objective of this methodology is to provide information that aligns with, and effectively advances, the Energy Bureau's intended purpose in requiring such disclosure. *Id.* at p. 1.

5. LUMA is committed to complying with the Final Rate Order to report the ten municipalities which could be exceeding their CILT-covered electricity use in a manner that reflects the Energy Bureau's intent; however, because FY2027 will commence on July 1, 2026, only two (2) months of actual consumption data will be available by October 1, which is the compliance deadline. *Id.*

6. To address this limitation, LUMA respectfully submits that it will follow a methodology that estimates consumption for the remaining months of FY2027 using historical monthly consumption patterns from Fiscal Years 2023 through 2025, combined with available FY2027 actual data. *Id.*

7. This approach provides a standardized and replicable framework while allowing for adjustments where historical data is not representative, including reliance on the most recent fiscal year when necessary. *Id.* at p. 2. LUMA respectfully submits that this methodology offers a reasonable and data-driven basis for compliance.

WHEREFORE, LUMA respectfully requests that this Energy Bureau **take notice** of the foregoing; **deem** LUMA in compliance with the Final Rate Order requirement to identify the municipalities that may be exceeding their CILT-covered electricity use; **take notice** of the methodology LUMA will apply to comply with the October 1, 2026 reporting requirement; and **grant** any other relief that the Energy Bureau deems just and appropriate.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 1st day of July 2026.



DLA Piper (Puerto Rico) LLC

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of July 2026, I filed the foregoing motion with the Clerk of the Puerto Rico Energy Bureau through the Energy Bureau's electronic filing system. Respectfully submitted. I further certify that on the same date I served a true and correct copy of the foregoing filing upon all parties of record in this proceeding via the Energy Bureau's electronic filing system, in accordance with the applicable rules and regulations, including:

The Independent Consumer Protection Office, through:
hrivera@jrsp.pr.gov;

Genera PR LLC, through:
legal@genera-pr.com;
regulatory@genera-pr.com;
lrn@roman-negron.com.

In Guaynabo, Puerto Rico, on the 1st day of July 2026.

/s/ Katiuska Bolaños Lugo
Katiuska Bolaños Lugo

Exhibit 1