

**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
COMPENSIVO DE MANEJO DE
VEGETACIÓN DE LA AUTORIDAD DE
ENERGÍA ELÉCTRICA

CASE NO. NEPR-MI-2019-0005

**SUBJECT: Motion Submitting Vegetation
Management Progress Report for the Fourth
Quarter of Fiscal Year 2026 and Restatement of
Previous Quarterly Reports**

**MOTION SUBMITTING VEGETATION MANAGEMENT PROGRESS REPORT
FOR THE FOURTH QUARTER OF FISCAL YEAR 2026 AND RESTATEMENT OF
PREVIOUS QUARTERLY 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:

I. Submittal of LUMA’s Fourth Quarter (“Q4”) Vegetation Management Progress Report for Fiscal Year 2026

1. On May 24, 2024, LUMA submitted to the Puerto Rico Energy Bureau (“Energy Bureau”) the proposed budget for the Transmission and Distribution System (“T&D Budget”), developed by LUMA. *See Request for Approval of T&D Budgets and Submission of GenCo Budgets for FY2025 and Budget Allocations for the Electric Power System*, filed by LUMA (“FY2025 Budget Submission”) in Case No. NEPR-MI-2021-0004, *In Re: Review of LUMA’s Initial Budgets* (“the Initial Budgets Docket”).

2. On June 26, 2024, this Energy Bureau issued a Resolution and Order regarding the FY2025 Budget Submission filed by LUMA on May 24, 2024, in the Initial Budgets Docket (“June 26th Order”). After evaluating the individual budgetary expenditures proposed by LUMA, Genera PR, LLC (“Genera”), and the Puerto Rico Electric Power Authority (“PREPA”), the Energy

Bureau modified the respective proposed FY2025 System Budgets, as established in Attachments A through F of the June 26th Order. The Energy Bureau approved the modified budgets, subject to the additional reporting requirements set forth in Attachments G and H of the June 26th Order. In what is pertinent to this motion, this Energy Bureau ordered LUMA to provide “comprehensive monthly updates on vegetation management activities, beginning August 1, 2024, using the Reporting Templates of Attachment G” to the June 26th Order. *See* June 26th Order, p. 7.

3. On August 8, 2024, the Energy Bureau issued a Resolution and Order (“August 8th Order”) in the Initial Budgets Docket, whereby it ordered LUMA to use the template in Attachment A for the quarterly Vegetation Management Progress Report. The Energy Bureau also ordered that the Vegetation Management Progress Reports (“VM Progress Reports”) would be due within 45 days after the end of each quarter, beginning with Q4 of FY2024 (August 15, 2024). The Energy Bureau further determined that the reports would be filed in this instant proceeding, and LUMA would be relieved of filing the Vegetation Clearing Report in the Initial Budgets Docket.

4. LUMA notes that, following several procedural events,¹ the Energy Bureau issued a Resolution and Order on July 15, 2026 (“July 15th Resolution”) that, among other things, relieved LUMA of the requirements imposed by the August 8th Order. Then, in response to LUMA’s August 4, 2026, motion (“August 4th Motion”),² the Energy Bureau issued another Resolution and

¹ *See* Final Resolution and Order on Electricity Rates, *In Re: Puerto Rico Electric Power Authority Rate Review*, Case No. NEPR-AP-2023-0003, April 15, 2026 (“Rate Case Final Order”); Resolution and Order issued in the instant proceeding on May 13, 2026 (“May 13th Order”); and LUMA’s filing on May 20, 2026 of the document titled *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* requesting 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 Final Order or to amend the quarter template adopted in the August 8th Order to incorporate any new data elements identified in the Rate Case Final Order, while preserving the quarterly reporting cadence.

² *See Motion Seeking Clarification of the July 15th Resolution and Order and Reconsideration of the Reporting Template and Deadline for Vegetation Management Progress Reports* filed by LUMA on August 4, 2026, in the present docket.

Order on August 11, 2026 (“August 11th Order”) that, among other things, approved LUMA’s proposed template for reporting tabular data on vegetation management progress for transmission and distribution lines in future quarterly reports, beginning with the first quarterly report for Fiscal Year 2027. Accordingly, this is LUMA’s final quarterly report using the template included as Attachment A to the August 8th Order. Going forward, LUMA will use the template set forth in the August 4th Motion to report on vegetation management progress for transmission and distribution lines, while adhering to the template set forth by the May 13th and July 15th Orders for substations.

5. In compliance with the August 8th Order, LUMA hereby submits its Fourth Quarter (“Q4”) Vegetation Management Progress Report for Fiscal Year 2026. *See Exhibit 1* to this Motion.

II. Restatement of Previous Quarterly Reports

6. As stated in its August 4th Motion, LUMA has worked with the Fiscal Oversight and Management Board (“FOMB”) and other stakeholders to develop a more detailed, structured, and operationally consistent template for reporting vegetation management progress. In developing the template, LUMA has sought to standardize data tracking across federally funded and ratepayer-funded work, correct historical data-entry inadvertent errors, and more accurately reflect the progress of the work performed. As part of this effort, LUMA conducted a full audit of all vegetation data for FY2025 and FY2026 and is issuing this restatement to reflect changes in reporting methodology and adjustments to prior inadvertent errors and inconsistencies.

7. Furthermore, to accurately reflect progress toward completing 100 percent of above-ground circuit miles, LUMA will report “impacted/completed miles,” which include both work miles (where vegetation is cleared) and no work miles (where miles are assessed but no

vegetation clearing is necessary, e.g., recently maintained lines and spans over roads, water, open farmland, etc.).³ A circuit is considered complete once all of the miles have been impacted/validated as clear.

8. As such, LUMA has revised the data for Q1 through Q3 of FY2026 as follows: Q1 increased by 83 miles cleared, Q2 decreased by 78 miles, and Q3 decreased by 82 miles. Therefore, year-to-date (“YTD”) miles cleared through Q3 of FY2026 now total 1,422 miles, compared to the previously reported 1,500 miles, for a net decrease of 77 miles. The largest adjustment relates to federally funded work, which reflects a reduction of 90 miles cleared. *See Exhibit 1.*

9. LUMA is also restating its FY2025 data. Overall, the miles cleared for FY2025 increased by 522 miles, consisting of 512 miles for federally funded work and 10 miles for operating expenditure work. Accordingly, LUMA submits, as *Exhibit 2*, an updated Q4 FY2025 Vegetation Management Progress Report reflecting the increased mileage reported for FY2025.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the above; **accept** the Q4 Vegetation Management Progress Report submitted as *Exhibit 1* to this Motion; **recognize** the restatement of the Q1 through Q3 Vegetation Management Progress Reports for FY2026; **replace** the previously filed Q4 FY2025 Vegetation Management Progress Report with the restated version submitted as *Exhibit 2* to this Motion; and **deem** LUMA in compliance with the August 8th Order regarding vegetation management progress reporting for Q4 of Fiscal Year 2026.

RESPECTFULLY SUBMITTED.

³ The Federally Funded Island-wide Reset Program’s scope is to complete one-time vegetation clearing on all above-ground circuits across Puerto Rico and transition those circuits into a regular maintenance cycle. Although not every portion of every circuit requires vegetation clearing, all above-ground miles are included in the program to ensure each circuit is fully assessed and placed on a maintenance schedule.

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, jfernandez@ecija.com, legal@genera-pr.com, regulatory@genera-pr.com.

In Guaynabo, Puerto Rico, this 14th day of August 2026.



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Exhibit 1

Vegetation Management Progress Report for the Fourth Quarter of FY2026
[Excel Spreadsheet submitted via Email]

Exhibit 2

Vegetation Management Progress Report for the Fourth Quarter of FY2025
[Excel Spreadsheet submitted via Email]