

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

NEPR

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IN RE: PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED
ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

SUBJECT: Motion for Extension of Time to Submit
LUMA's Updated Position Regarding Temporary
Generation

**MOTION FOR EXTENSION OF TIME TO SUBMIT LUMA'S UPDATED POSITION
REGARDING TEMPORARY GENERATION**

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 Background

1. On February 26, 2025, Genera PR, LLC ("Genera") filed with this Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") a document entitled *Request for Expedited Approval of Emergency Generation Capacity Solutions* ("Genera's Request") in which Genera sought the Energy Bureau's approval to implement proposed options for temporary generation to "allow for critical maintenance to be performed on existing power plants while stabilizing the grid in the short term" and "guarantee system stability while recovery projects are performed" consisting of installing additional Temporary Mobile Generators of approximately 800 MW for 18 months; substituting damaged units with pre-owned but functional generating units; and deploying generation barges to supplement the power supply. *See Genera Request*, ¶ 6 and WHEREFORE.

2. On February 27, 2025, this Energy Bureau issued a Resolution and Order (“February 27th Order”) ordering LUMA to present its position on Genera’s Request and, specifically, “the need for additional temporary generation, and the capacity thereof, if any, in light of the findings of the Resource Adequacy Report”.¹ See February 27th Order, p. 1.

3. On March 6, 2025, LUMA filed a *Motion Submitting LUMA’s Position Regarding Genera’s Request for Expedited Approval of Emergency Generation Capacity Solutions* (“March 6th Motion”), in which it submitted a preliminary response stating its position in regard to Genera’s Request. See March 6th Motion, Exhibit 1. In its Preliminary Response, LUMA explained that it had not had the opportunity to review or make any assessment on the schedule or technical challenges of locating and installing 800 MW of generation, which requires a thorough assessment of Genera’s proposal such as identifying and prioritizing locations, assessing site conditions, and performing system impact modeling, and that such an assessment requires a sizable workforce and budget to complete. See *id.*, Exhibit 1, page 3.

4. On March 12, 2025, the Energy Bureau issued a Resolution and Order (“March 12th Order”) in which, among others, it referenced LUMA’s Preliminary Response, highlighting LUMA’s statements regarding the need for a more detailed analysis of Genera’s proposal, and ordered LUMA to submit, within ten (10) days, these studies. See March 12th Order, p. 2.

5. On March 24, 2025, LUMA submitted a detailed analysis relating to the 800 MW offshore proposal (titled “Emergency Offshore Power Interconnection Assessment”) noting that a comprehensive assessment of individual project locations, interconnections, and fuel supply—

¹ The Resource Adequacy Report refers to a report prepared by LUMA titled *Puerto Rico Electrical System Resource Adequacy Analysis Report* and submitted to the Energy Bureau on October 31, 2024, in Case No. NEPR-MI-2022-0002, *In re: LUMA Resource Adequacy Study*.

including a System Impact Study and a Feasibility Study—required further detailed analysis to determine the full feasibility of any proposed solution. *See Motion in Compliance with Resolution and Order of March 12, 2025, and Request for Confidential Treatment.*

6. On March 28, 2025, the Energy Bureau issued a Resolution and Order (“March 28th Order”) whereby it established the Electric System Priority Stabilization Two-Year Plan (“Priority Stabilization Plan”). As part of the plan, the Energy Bureau authorized the initiative to procure up to 800 MW of additional emergency temporary generation, recognizing that the addition of dependable, dispatchable capacity was necessary to address the system’s reserve-margin shortfall and reduce expected load shedding. *See* March 28th Order, pp. 5-7 and Attachment A.

7. On December 5, 2025, LUMA submitted its Fiscal Year 2026 Puerto Rico Electrical System Resource Adequacy Analysis Report (“FY2026 Resource Adequacy Study”) in Case No. NEPR-MI-2022-0002, *In Re LUMA Resourced Adequacy Study*. In it, LUMA continued to identify a significant resource-adequacy deficiency and found that major improvements in resource adequacy could be expected only if supply resources were materially increased through new resource additions or major improvements to the existing generation fleet. *See Motion to Submit LUMA’s Fiscal Year 2026 Resource Adequacy Study and Request for Confidential Treatment*, Exhibit 1, p. 10. Of particular importance, LUMA’s principal sensitivity analyses found that the addition of 900 MW of generation to be always available would improve Puerto Rico’s adequacy to levels approaching mainland U.S. standards. *See id.*

8. Finally, on August 19, 2026, the Energy Bureau issued a Resolution and Order (“August 19th Order”) finding that an updated assessment from LUMA was needed on whether the generation-resource deficiency identified by LUMA in March 2025 continues to exist, the magnitude of any remaining deficiency, and the extent to which developments since that time—

including changes reflected after the FY2026 Resource Adequacy Study—affect the need for the temporary generation capacity that gave rise to this proceeding. Accordingly, the Energy Bureau ordered LUMA to complete and file, within ten (10) days from the notification of the August 19th Order, an updated assessment of LUMA’s position (“Updated Position”) as stated in the March 6th Motion regarding the need for additional temporary generation, that includes the following:

- (i) State whether LUMA continues to conclude that additional temporary generation is necessary to maintain adequate generation reserves and system reliability;
- (ii) Quantify the amount of additional dependable generation capacity, if any, that LUMA currently determines is necessary;
- (iii) Update the analysis and studies supporting its March 6th Motion position using the most current information reasonably available; and
- (iv) Explain the principal changes in assumptions and system conditions since the March 6th Motion and the FY2026 Resource Adequacy study.

See August 19th Order, pp. 2-3.

9. The Energy Bureau also directed that the Updated Position account for generating units that have been repaired, returned to service, or experienced material changes in availability or dependable capacity; units that remain unavailable or have experienced new or extended outages; and generation, storage, demand-response, or other supply resources that have entered service or are reasonably expected to enter service during the relevant period. The Energy Bureau further directed that, to the extent that the Updated Position differs from its prior determination concerning the need for approximately 800 MW of additional temporary generation, LUMA shall identify and explain the basis for such change. Furthermore, the Energy Bureau clarified that the Updated Position shall not assume that the generation capacity associated with three temporary sources discussed in the August 19th Order will enter service or otherwise be available to the system unless there is sufficient certainty that the applicable agreements have been executed, have

received all required approvals (including FOMB approval), and will become effective within the relevant period. *See id.*

II. Request for Extension

10. LUMA respectfully submits that the 10-day period to prepare its Updated Position is insufficient given the scope of work required to develop a thorough updated assessment of the need for additional temporary generation. To prepare its Updated Position, LUMA must conduct an assessment of the study period, with particular focus on the months from May 2026 through October 2026, when demand is expected to peak. This assessment will require review of several key data inputs, including the load forecast profile, monthly peak demand, distributed generation integration, generation facilities, outage factors, dependable capacity, and the scheduled outage program. LUMA must also conduct simulations and evaluate different sensitivity cases, revising key assumptions to incorporate the most current information and account for any material changes or impacts on resource adequacy. The results, assumptions, and conclusions will then be compiled into a detailed technical report to promote transparency and clarity.

11. In light of the scope and complexity of these tasks and analyses, LUMA respectfully requests that the Energy Bureau grant an extension of time, until September 4, 2026, to submit LUMA's Updated Position as required by the August 19th Order. The requested extension will allow LUMA sufficient time to submit a comprehensive assessment. LUMA submits this request in good faith, without intent to cause undue delay, and to ensure that each filing before the Energy Bureau receives 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 LUMA's Updated Position*

Regarding Temporary Generation; and, accordingly, **extend** the deadline to file LUMA's Updated Position until September 4, 2026.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 25th day of August 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, and Natalia Zayas Godoy, nzayas@gmlex.net, and to Genera PR LLC, through its counsel of record Luis R. Roman-Negron, lrm@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com.



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