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

NEPR
Received:
May 30, 2025
5:49 PM

IN RE: APRIL 16, 2025 BLUESKY TOTAL BLACKOUT EVENT

CASE NO.: NEPR-IN-2025-0003

SUBJECT: Initiation of Investigation - Preliminary Outage Report

PETITION TO PARTICIPATE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, EcoEléctrica, L.P. ("EcoEléctrica"), represented by the undersigned legal counsel, and respectfully states and prays as follows:

1. On April 16, 2025, Puerto Rico experienced a system-wide blackout under clear weather conditions (the "Bluesky Event").
2. In response to the Bluesky Event, the Honorable Puerto Rico Energy Bureau (the "Bureau") issued a Resolution and Order on May 22, 2025, formally launching Case No. NEPR-IN-2025-0003. The Bureau cited the recurrence of major blackouts—including those on April 6, 2022 and December 31, 2024—as cause for serious concern and underscored the urgent need to address ongoing grid reliability issues.
3. Exercising its authority under Act 57-2014, Act 17-2019, and Regulation 8543, the Bureau ordered LUMA Energy to submit a Preliminary Outage Report by April 24, 2025 ("LUMA's April 24 Outage Report"), with a more detailed Root Cause Analysis to follow. The proceeding aims to conduct a comprehensive evaluation of the transmission and distribution systems, including their maintenance, operational protocols, and reliability, all of which are critical to ensuring the secure and stable delivery of electric service throughout the Island.

4. EcoEléctrica hereby respectfully submits this Petition to Participate in the above-captioned proceeding.
5. EcoEléctrica owns and operates a 540-megawatt combined-cycle natural gas cogeneration facility, the only facility of its kind in Puerto Rico's electric system. It was the first independent power producer integrated into the grid, and it plays a central role in baseload generation, voltage stabilization, and frequency control. That facility supplies approximately 17% of Puerto Rico's total electric generation, and Ecoelectrica's LNG terminal handles approximately 33% of the Island's fuel imports for electric power production.
6. Ecoelectrica's interests were adversely affected by the Bluesky Event. Given EcoEléctrica's critical role in both generation dispatch and fuel infrastructure, its operations are directly impacted by the resiliency, coordination, and technical performance of the transmission and distribution system under investigation in this proceeding. System-wide failures such as the Bluesky Event pose severe operational and commercial risks to EcoEléctrica, including emergency plant shutdowns and extended black start periods; dispatch disruptions and potential curtailments; and increased operational costs and mechanical stress, among others.
7. Moreover, EcoEléctrica's interests cannot be adequately represented by other parties in this proceeding, and it is not aware of any alternative legal mechanism by which to ensure the protection of its rights before the Bureau.
8. EcoEléctrica's participation will be conducted in accordance with applicable regulations and will not unduly delay the proceeding or broaden its scope. On the contrary, its involvement will promote the Bureau's stated goal of conducting an

exhaustive and technically rigorous review of the root causes of the blackout to evaluate its impact on the transmission and distribution systems

9. Furthermore, EcoEléctrica hereby respectfully requests access, under the terms of a Non-Disclosure Agreement ("NDA"), to LUMA's April 24 Outage Report. The information requested by EcoEléctrica is not sought for public release, but for limited disclosure to EcoEléctrica under confidentiality protection so that, in keeping with the purpose of this proceeding, EcoEléctrica may understand and assess the findings to date and, if necessary, proactively take risk mitigation measures and prepare for potential future scenarios in light of such findings.

WHEREFORE, EcoEléctrica respectfully requests that the Honorable Puerto Rico Energy Bureau take notice of the foregoing Petition to Participate; grant this request to participate in Case No. NEPR-IN-2025-0003; grant EcoElectrica access, under the terms of a NDA, to LUMA's April 24 Outage Report; and provide any further order it deems proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of May 2025.

We hereby certify that we filed this Petition using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Petition to Luma Energy, LLC to the following: mario.hurtado@lumapr.com, legal@lumapr.com, and preborders@lumapr.com.

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