

**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 Report
Regarding Top Ten Municipalities Likely to
Exceed the CILT Consumption Cap in Compliance
with Final Rate Order

**MOTION TO SUBMIT REPORT REGARDING TOP TEN MUNICIPALITIES
LIKELY TO EXCEED THE CILT CONSUMPTION CAP IN
COMPLIANCE WITH FINAL RATE ORDER**

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 Re: Puerto Rico Electric Power Authority Rate Review*, case no. NEPR-AP-2023-0003, *Final Resolution and Order on Electricity Rates* (P.R. Energy Bureau April 15, 2026).

2. The Final Rate Order includes multiple orders, including for LUMA to "[n]o later than October 1, 2026, ... identify the top ten municipalities which could be exceeding their CILT-covered electricity use." Final Rate Order, Chapter Eight at 14.

3. LUMA's report submitted in compliance with the foregoing directive is attached hereto as **Exhibit 1** (the "CILT Report").

4. To prepare the CILT Report, LUMA implemented a quantitative methodology designed to ensure full compliance and to provide information that aligns with, and effectively advances, the Energy Bureau's intended purpose in requiring such disclosure. *See* Exhibit 1.

5. LUMA respectfully affirms its commitment to complying with the Energy Bureau's reporting requirements in a manner consistent with the intent of the Final Resolution and Order. Nonetheless, because Fiscal Year ("FY") 2027 commenced on July 1, 2026, only two months of observed consumption data (July and August 2026) were available at the time the CILT Report was prepared for submission by the October 1, 2026 compliance deadline. *Id.*

6. To address the limited availability of FY2027 actual data, LUMA implemented an estimation methodology that uses historical monthly consumption patterns from Fiscal Years 2023, 2024, and 2026, in combination with available FY2027 actuals. The inclusion of FY2026 data, which was not part of the methodology initially proposed in LUMA's July 1, 2026 filing,¹ ensures that all analyses align with current observed trends and reliable historical datasets. FY2025 was intentionally excluded from the historical dataset due to historically higher temperatures in Puerto Rico, which resulted in a substantial increase in load and unrepresentative consumption levels across municipalities. This exclusion ensures that the resulting estimations reflect typical municipal usage patterns rather than temperature-driven anomalies.

7. This methodological approach remains standardized, replicable, and sufficiently adaptable to account for circumstances where historical data may not be representative, including factors such as rebilling adjustments, account reclassifications ordered by the Energy Bureau, or weather-related impacts. In instances where representative monthly patterns could not be identified, LUMA applied consumption data from the most recently completed fiscal year. Accordingly, LUMA submits that the methodology employed to prepare the underlying analysis for the CILT Report provides a reasonable, data-driven basis for compliance and supports the

¹ See 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 (P. R. Energy Bureau Jul. 1, 2026).

Energy Bureau's evaluation of municipal consumption behavior and estimated excess consumption for FY2027.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **TAKE NOTICE** of the foregoing; **DEEM** LUMA in compliance with the Final Rate Order requirement to identify the top ten municipalities that may be exceeding their CILT-covered electricity use and with the October 1, 2026 reporting deadline; and **GRANT** any other relief that the Energy Bureau deems just and appropriate.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 30th day of September 2026.



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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of September 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;
legal@genera-pr.com;

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

In Guaynabo, Puerto Rico, on the 30th day of September 2026.

/s/ Katiuska Bolaños Lugo
Katiuska Bolaños Lugo

Exhibit 1