NEPR

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

IN RE: REQUERIMIENTO DE INFORMACIÓN A LUMA ENERGY, LLC Y LUMA ENERGY SERVCO, LLC SOBRE ACUERDOS SUSCRITOS CON MUNICIPIOS RELACIONADOS CON ALUMBRADO PÚBLICO	**CASE NO. NEPR-MI-2026-0001** **SUBJECT: CUMULATIVE STATUS REPORT FOR SEPTEMBER 22, 2026 THROUGH OCTOBER 7, 2026**

MOTION SUBMITTING CUMULATIVE STATUS REPORT FOR SEPTEMBER 22, 2026 THROUGH OCTOBER 7, 2026, IN COMPLIANCE WITH RESOLUTION AND ORDER OF SEPTEMBER 22, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo") and **LUMA Energy ServCo, LLC** ("ServCo") (collectively, "LUMA"), and respectfully state and request as follows:

I. Relevant Background and Procedural History

1. On February 11, 2026, this Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("February 11th Order") stating that it had learned that LUMA had executed agreements with Municipalities related to the installation, repair, and maintenance of public luminaries and ordering LUMA to respond to Requests for Information on the subject (the "RFIs") within twenty (20) days of notification of the February 11th Order.

2. On March 3, 2026, LUMA filed its *Motion Submitting Responses to Requests for Information, in Compliance with Resolution and Order of February 11, 2026, and Request for Confidential Treatment of Exhibit 2 Herein* ("March 3rd Motion"), in which LUMA submitted its responses to the RFIs set forth in the February 11th Order. In the March 3rd Motion, LUMA noted that it had not executed any intergovernmental agreement with Municipalities for the installation,

repair, and maintenance of public luminaries. LUMA further informed this Energy Bureau that it had developed a draft template agreement for such purposes, which it attached to the March 3rd Motion.

3. On June 10, 2026, this Energy Bureau adopted the *Regulation for the Authorization, Oversight, and Regulation of Municipal Participation in Public Street Lighting Connected to the Electric Grid* ("Regulation 9774"), which was filed with the Puerto Rico Department of State on June 22, 2026. It became effective thirty (30) days later, on July 22, 2026.

4. On September 22, 2026, this Energy Bureau issued a Resolution and Order ("September 22nd Order") stating that the record of this proceeding did "not reflect whether, since March 3, 2026, LUMA has provided any municipality with a draft agreement, continued individual discussions with municipalities, advanced any agreement toward execution, or executed any agreement, as required by Sections 4.2, 4.4, and 9.1 of Regulation 9774". September 22nd Order, p. 1. Accordingly, the Energy Bureau ordered LUMA to provide specified information on the subject within ten (10) calendar days of notification of the September 22nd Order. *See id*.

5. In the September 22nd Order, the Energy Bureau ordered LUMA to periodically file a cumulative status report informing LUMA's activities to discuss, engage, or execute agreements with municipalities pursuant to Regulation 9774. *See id*., p. 2. The content required by the Energy Bureau is detailed in the September 22nd Order. *See id*. The Energy Bureau also ordered the submission of said cumulative status reports beginning fifteen (15) calendar days after notice of the September 22nd Order, and every fifteen (15) calendar days thereafter until further order by this Energy Bureau. *See id*.

6. On October 2, 2026, LUMA filed its *Motion Submitting Reponses to Requests for Information, in Compliance with Resolution and Order of September 22, 2026* ("October 2nd

Motion") in which LUMA submitted responses to the requests for information set forth in the September 22nd Order. LUMA also noted that no agreements with municipalities for the installation, repair, and maintenance of public luminaries had been executed. *See* October 2nd Motion, p. 2. Additionally, LUMA informed this Energy Bureau that it had sent electronic correspondence to all seventy-eight (78) municipalities and their mayors, inviting them to express their interest in executing an Intergovernmental Agreement with LUMA for streetlight replacement work. *See id*.

II. Submittal of Cumulative Status Report

1. In compliance with the September 22nd Order, LUMA hereby submits the Cumulative Status Report for September 22, 2026 through October 7, 2026. *See* Exhibit 1. LUMA notes that, as informed in the attached responses, LUMA has established communications related to potential municipal public street lighting agreements with dozens of municipalities. As a result, LUMA has scheduled meetings with the municipalities of Bayamon and Caguas which will be held after the date of this report. Additionally, some municipalities have expressed their interest but are conducting internal discussions and reviews before informing next steps to LUMA.

2. Furthermore, LUMA notes that the municipalities of Lares, Aguas Buenas, and Moca stated that they prefer the public street lighting work to be conducted by LUMA's contractors to avoid delaying any work as they currently do not have the capacity to execute the project. On October 6, 2026, LUMA sent an electronic communication to Lares, Aguas Buenas, and Moca to confirm their decision in writing. *See* Attachments A, B and C.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice** of the foregoing; **accept** LUMA's Cumulative Status Report for September 22, 2026 to October 7, 2026; **deem** LUMA in compliance with the September 22nd Order.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 7th day of October 2026.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau.

DLA Piper (Puerto Rico) LLC
B-7 Tabonuco St., Suite 1501
Guaynabo, PR 00968
Tel. 787-945-9147
Fax 939-697-6147

/s/ Laura T. Rozas
Laura T. Rozas
PR Bar No. 10,398
laura.rozas@us.dlapiper.com

/s/ *Javier Alfredo Arroyo Plaza*
Javier Alfredo Arroyo Plaza
PR Bar No. 23,932
javier.arroyoplaza@us.dlapiper.com

Exhibit 1

LUMA's Cumulative Status Report for September 22, 2026 through October 7, 2026

IN RE: RFI to LUMA Energy Regarding Agreements with Municipalities Related to Public Street Lighting

Docket Number:

NEPR-MI-2026-0001

SUBJECT

Status of municipal public streetlighting agreements and periodic reporting requirements.

REQUEST

a. Each municipality with which LUMA has met individually to discuss a possible municipal public street lighting agreement, including the date of each meeting and a concise statement of the matters discussed;

b. Each municipality in the process of executing an agreement, including the date on which a draft was provided, the current stage of the process, the remaining steps before execution, and the anticipated execution date; and

c. Each municipality with which an agreement has been executed, including the execution date, effective date, term, scope of authorized work, and status. LUMA shall attach a complete copy of each executed agreement and submit it for the Energy Bureau's evaluation and authorization pursuant to Section 4.2 of Regulation 9774.

RESPONSE

Insert response:

a) On October 2, 2026, LUMA filed its first report under the 10-day response requests. In said response, LUMA provided dates for two coordinated meetings with the municipalities of Bayamon and Caguas. The meeting with the Municipality of Bayamon was coordinated for October 5, 2026, and said meeting was postponed by the Municipality to October 8, 2026. LUMA also currently has a meeting scheduled with the Municipality of Caguas on October 21, 2026. Therefore, as of this date LUMA has not met yet with any Municipality.

We offer the following update on events relating to submittal of draft agreement for discussion with Municipalities:

- San Lorenzo confirmed receipt but wanted a certified legal translation before proceeding.

- Mayaguez confirmed receipt and interest.
- Juncos confirmed receipt, pending final decision from Mayor on participation.
- Santa Isabel communicated interest, submitted questions pending response from LUMA.
- Morovis received communication will be discussed internally.
- Fajardo received communication will do an internal legal analysis before committing.
- Adjuntas confirmed receipt pending confirmation of next steps.
- Guaynabo confirmed interest reviewing document, will communicate meeting requests.
- Humacao confirmed receipt pending confirmation of next steps.
- San Juan interested conducting final review before moving forward.
- Hatillo submitted questions before continuing with process, LUMA preparing responses.
- Toa Baja submitted questions before continuing with process, LUMA preparing responses.
- Hormigueros submitted questions before continuing with process, LUMA preparing responses.
- Naguabo does not have the equipment or crews, and is not interested.
- Lares, Aguas Buenas, and Moca, see detailed response in (b).

b) Draft was provided to all municipalities on September 23, 2026.

See the above response in (a) for individual municipality responses. Additionally, LUMA has been in communication with the municipalities of Lares, Aguas Buenas and Moca. All three municipalities have stated that they prefer the work to be conducted by LUMA's contractors to avoid delaying any work as they currently don't have the capacity to execute the project.

- On October 6, 2026, an electronic communication (email) was sent to Lares, Aguas Buenas, and Moca to confirm in writing their decision. (See attachments A, B and C, respectively)

c) As of October 7, 20226, LUMA has not executed an agreement with a municipality.

REQUEST

Each periodic status report shall:
a. Cover all relevant activity from March 3, 2026, through the date of the report;

b. Identify all changes since the immediately preceding report;

c. State expressly when no activity or change occurred in any required category; and

d. Continue to include previously reported municipalities until the Energy Bureau authorizes such agreement, LUMA and the municipality discontinue negotiations, or the Energy Bureau otherwise directs.

RESPONSE

a. All relevant activity from March 3, 2026, through the date of this report is reported in the answers provided above.

b. Not applicable for this first report, subsequent report will comply with requests.

c. Not applicable for this first report, subsequent report will comply with requests.

d. Not applicable for this first report, subsequent report will comply with requests.

Attachment A

LUMA's electronic communication to Lares

Outlook

(No subject)

From Arroyo Plaza, Javier <javier.arroyoplaza@us.dlapiper.com>
Date Wed 10/7/2026 5:26 PM
To Arroyo Plaza, Javier <javier.arroyoplaza@us.dlapiper.com>

From: Glorimar Pérez Rivera
Sent: Wednesday, October 6, 2026 4:56 PM
To: oficinadelalcalde@lares.pr.gov; lcastaneda@lares.pr.gov; auditoria@lares.pr.gov
Cc: Lizbeth Torres Colon <Lizbeth.TorresColon@lumapr.com>; Lissette E Sanabria Quiles <Lissette.Sanabria@Lumapr.com>
Subject: Confirmación de trabajos bajo el Programa de Alumbrado Público Comunitario (FEMA)

LUMA | CUENTAS CLAVE

Estimado Honorable Alcalde Fabián Arroyo:

Reciba un cordial saludo. Por medio de la presente, y conforme a las conversaciones sostenidas con el Municipio, LUMA Energy confirma que procederá a comenzar los trabajos de reparación y reemplazo del sistema de alumbrado público en el Municipio de Lares bajo el Programa de Alumbrado Público Comunitario (fondos federales FEMA), conforme a la solicitud del Municipio de que LUMA proceda a adelantar estos trabajos.

Las brigadas están preparadas para iniciar la Fase 1 el 19 de octubre de 2026. Es importante aclarar que este programa es independiente del Acuerdo Intergubernamental de Colaboración (MOU) al amparo de la Ley Núm. 174-2026, sobre el cual LUMA previamente extendió una invitación al Municipio para evaluar una colaboración adicional en materia de alumbrado público. El inicio de los trabajos aquí confirmados no sustituye ni afecta esa invitación, la cual permanece abierta. LUMA reitera su disposición para continuar esas conversaciones y coordinar los próximos pasos del Acuerdo de Colaboración en el momento que resulte conveniente para el Municipio.

Quedamos a la disposición para atender cualquier pregunta sobre los trabajos aquí confirmados o sobre el Acuerdo de Colaboración.

Cordialmente,

GLORIMAR PEREZ RIVERA
Key Accounts Representative, Mayaguez Region
(787) 307-3911
glorimar.perez@lumapr.com
lumapr.com

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Attachment B

LUMA's electronic communication to Aguas Buenas

Outlook

(No subject)

From Arroyo Plaza, Javier <javier.arroyoplaza@us.dlapiper.com>
Date Wed 10/7/2026 5:27 PM
To Arroyo Plaza, Javier <javier.arroyoplaza@us.dlapiper.com>

From: Ishvara Paniagua Umpierre <Ishvara.Paniagua@Lumapr.com>
Sent: Wednesday, 07 October 2026 09:40:51
To: alcaldesa aguasbuenaspr.net <alcaldesa@aguasbuenaspr.net>
Cc: Kermith Carrión Rodríguez <Kermith.Carrion@Lumapr.com>; Melissa Pueyo Sanchez <Melissa.Pueyo@Lumapr.com>
Subject: Alumbrado Público - Aguas Buenas

Estimada Honorable Alcaldesa Karina Serrano:

Reciba un cordial saludo. Por medio de la presente, y conforme a las conversaciones sostenidas con el Municipio, LUMA Energy confirma que procederá a comenzar los trabajos de reparación y reemplazo del sistema de alumbrado público en el Municipio de Aguas Buenas bajo el Programa de Alumbrado Público Comunitario (fondos federales FEMA), conforme a la solicitud del Municipio de que LUMA proceda a adelantar estos trabajos.

Las brigadas están preparadas para iniciar la Fase 1 el 19 de octubre de 2026. Es importante aclarar que este programa es independiente del Acuerdo Intergubernamental de Colaboración (MOU) al amparo de la Ley Núm. 174-2026, sobre el cual LUMA previamente extendió una invitación al Municipio para evaluar una colaboración adicional en materia de alumbrado público. El inicio de los trabajos aquí confirmados no sustituye ni afecta esa invitación, la cual permanece abierta. LUMA reitera su disposición para continuar esas conversaciones y coordinar los próximos pasos del Acuerdo de Colaboración en el momento que resulte conveniente para el Municipio.

Quedamos a la disposición para atender cualquier pregunta sobre los trabajos aquí confirmados o sobre el Acuerdo de Colaboración.

Cordialmente,



ISHVARA PANIAGUA UMPIERRE

Representante Cuentas Clave

787.307.9426

ishvara.paniagua@lumapr.com

lumapr.com

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Attachment C

LUMA's electronic communication to Moca

Outlook

CARTA MUNICIPIO DE MOCA

From Lissette E Sanabria Quiles <Lissette.Sanabria@Lumapr.com>

Date Tue 10/6/2026 4:29 PM

To ermelinda.valentin@yahoo.com <ermelinda.valentin@yahoo.com>; eebabilonia@hotmail.com <eebabilonia@hotmail.com>

Cc Melissa Pueyo Sanchez <Melissa.Pueyo@Lumapr.com>; Lizbeth Torres Colon <Lizbeth.TorresColon@Lumapr.com>

Estimado Honorable Alcalde Efraín Franco Barreto:

Reciba un cordial saludo. Por medio de la presente, y conforme a las conversaciones sostenidas con el Municipio, LUMA Energy confirma que procederá a comenzar los trabajos de reparación y reemplazo del sistema de alumbrado público en el Municipio de Moca bajo el Programa de Alumbrado Público Comunitario (fondos federales FEMA), conforme a la solicitud del Municipio de que LUMA proceda a adelantar estos trabajos.

Las brigadas están preparadas para iniciar la Fase 1 el 19 de octubre de 2026. Es importante aclarar que este programa es independiente del Acuerdo Intergubernamental de Colaboración (MOU) al amparo de la Ley Núm. 174-2026, sobre el cual LUMA previamente extendió una invitación al Municipio para evaluar una colaboración adicional en materia de alumbrado público. El inicio de los trabajos aquí confirmados no sustituye ni afecta esa invitación, la cual permanece abierta. LUMA reitera su disposición para continuar esas conversaciones y coordinar los próximos pasos del Acuerdo de Colaboración en el momento que resulte conveniente para el Municipio.

Quedamos a la disposición para atender cualquier pregunta sobre los trabajos aquí confirmados o sobre el Acuerdo de Colaboración.

Cordialmente,
Lissette E Sanabria Quiles
Representante Cuentas Clave
LUMA Energy

LISSETTE E. SANABRIA QUILES
Key Accounts Representative
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