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

REYES PADUA
Petitioner

vs.

LUMA ENERGY LLC and
LUMA ENERGY SERVCO, LLC
Respondents

Case No. NEPR-QR-2026-0411

Matter: Answer to Complaint

ANSWER TO COMPLAINT

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively "LUMA"), through their undersigned legal counsel and very respectfully, **STATE** and **REQUEST**:

1. The first paragraph of the *Relation of Facts* section included in the Complaint is neither denied nor admitted, as it does not require a responsive pleading. Should it require a responsive pleading, said section is denied.

2. The second paragraph of the *Relation of Facts* section included in the Complaint is denied. It is affirmatively asserted that the first time Petitioner contacted LUMA to allege that his meter was not functioning properly or was not displaying information was on September 23, 2026. It is also asserted that there are no customer contacts in Petitioner's electric service account (no. 8619904036) for May nor October 2025. On April 22, 2026, Ms. Ivonne Méndez (Petitioner's spouse) visited LUMA's offices to claim that their electric service bills were being estimated. Finally, there are no customer contacts in Petitioner's electric service account for August 2026.

3. The third paragraph of the *Relation of Facts* section included in the Complaint is denied. It is affirmatively asserted that the first time Petitioner contacted LUMA to allege that his meter was not functioning properly or was not displaying information was on September 23, 2026. It is also asserted that there are no customer contacts in Petitioners electric service account (no. 8619904036) for May nor October 2025. On April 22, 2026, Ms. Ivonne Méndez (Petitioner's spouse) visited LUMA's offices to claim that the electric service bills were being estimated. Finally, there are no customer contacts in Petitioner's electric service account for August 2026.

4. The third paragraph of the *Relation of Facts* section included in the Complaint is denied. It is affirmatively asserted that LUMA has no knowledge of Petitioner's living arrangements nor the management of his apartment's circuit breakers or main breakers. Although Petitioner's electric bills for May through September 2026 do in fact show estimated consumption, Petitioner has only objected to two (2) of said bills (August 14, 2026 - OBW20260902861340921475 / September 14, 2026 - OB20260923zVij). Both billing objection proceedings are still pending before LUMA.

5. The *Remedy Requested* section included in the Complaint is neither denied nor admitted, as it does not require a responsive pleading. Should it require a responsive pleading, said section is denied. It is affirmatively asserted that this Honorable Bureau lacks jurisdiction to address any claims pertaining to electric service bills for which the applicable informal administrative proceeding before LUMA has not been exhausted.

AFFIRMATIVE DEFENSES

1. The Complaint is wholly or partially time barred.

2. The Complaint was filed outside the applicable regulatory time limits and, therefore, this Energy Bureau lacks jurisdiction to address the same.

3. Petitioner failed to exhaust the applicable informal administrative proceeding before LUMA previous to filing his Complaint and, therefore, this Energy Bureau lacks jurisdiction to address the same.

4. As the only two (2) billing objection proceedings for Petitioner's electric service account are still pending before LUMA, the filing of the Complaint is premature.

5. Petitioner's electric meter was replaced on September 14, 2026.

6. Petitioner has failed to present a meritorious claim that would justify the granting of a remedy.

7. Any fact not expressly admitted in this Answer to Complaint must be deemed denied.

8. All conclusions of law that may be contained in the Complaint are hereby denied.

THEREFORE, it is respectfully requested from this Honorable Bureau to take notice of the foregoing and to deem the Complaint hereby answered, with any other pronouncement that may be appropriate in law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 13, 2026.

CERTIFICATION OF NOTIFICATION

I HEREBY CERTIFY that this document has been filed through the Electronic Filing System of the Puerto Rico Energy Bureau of Puerto Rico at https://radicacion.energia.pr.gov/, through which the Bureau and the parties will receive notification. Likewise, a copy will be sent to the Petitioner at his email address: reypad@snet.net.

[Signature on next page.]

Legal Counsel for LUMA



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