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BEFORE THE PUERTO RICO ENERGY BUREAU

Case No. NEPR-QR-2026-041

REYES PADUA, Petitioner

v.

LUMA ENERGY, LLC and LUMA ENERGY SERVCO, LLC, Respondents

PETITIONER'S RESPONSE AND OBJECTION TO LUMA ENERGY'S ANSWER TO COMPLAINT

To the Honorable Puerto Rico Energy Bureau:

I respectfully submit this response to object to certain statements and assertions made by LUMA Energy, LLC and LUMA Energy ServCo, LLC in their Answer to Complaint dated October 13, 2026.

1. Prior Reports of the Meter Problem and Billing Concerns

LUMA asserts that September 23, 2026, was the first time I reported that my electric meter was malfunctioning or failing to display information. I dispute this assertion.

Before leaving Puerto Rico in April 2026, I contacted LUMA regarding the ongoing concerns with the electric service and billing and was provided case number **0837044560**. Additionally, on April 22, 2026, my spouse, Ivonne Méndez, visited LUMA's offices to report that our electric bills were being estimated.

Furthermore, in July 2026, I contacted LUMA to dispute the charges on that month's bill and again reported the meter problem. LUMA representative **Sra. Chaparro** provided case number **834436400**. During that conversation, she did not inform me that any additional procedure or documentation was required to register my billing objection. I reasonably understood that my dispute and the meter problem had been documented under that case number.

I respectfully request that LUMA be required to review its customer service records, telephone records, case histories, and any other available documentation associated with these case numbers. The absence of a contact entry in the electric service account does not, by itself, establish that the contact did not occur.

2. Estimated Charges During a Period When the Apartment Was Unoccupied

LUMA acknowledges in its Answer that the electric bills from May through September 2026 reflected estimated consumption.

The apartment was unoccupied from May 2026 through September 17, 2026, and all power was turned off. I can provide supporting evidence that I was not in Puerto Rico during this period, along with documentation concerning the lack of water consumption at the property.

These facts raise legitimate questions about the accuracy of the estimated electric consumption and the basis for the charges imposed during the disputed period.

I request that LUMA provide the meter readings, estimates, calculation methods, and other records used to determine the charges for the relevant months. I also request that the Bureau consider the supporting evidence I submit when evaluating whether those charges accurately reflect actual consumption.

3. July 2026 Billing Objection

LUMA asserts that only two billing objections have been submitted for my account: those associated with the August 14, 2026, and September 14, 2026, bills.

However, I specifically disputed the July 2026 bill by telephone and received case number **834436400**. I also reported the meter problem during that call.

I was not advised that any additional step was necessary to formalize the objection. I therefore request that LUMA explain how this July dispute was recorded, what action was taken in response, and why it is not identified among the billing objections described in its Answer.

I further request that the Bureau consider the circumstances under which I reported the dispute and whether LUMA's handling and documentation of that contact contributed to the present disagreement.

4. Meter Replacement and the Need for a Billing Review

LUMA states that the electric meter was replaced on September 14, 2026. I request that LUMA provide the available records concerning the replacement, including the reason for replacement, the condition of the previous meter, and any final or historical readings obtained.

The meter replacement and LUMA's acknowledgment that the bills were estimated make it important to establish whether the charges accurately represent electricity consumed during the disputed period.

5. Request for Relief

In light of the foregoing, I respectfully request that the Puerto Rico Energy Bureau:

1. Consider this response and the supporting documentation I submit when evaluating LUMA's Answer to Complaint.
2. Request or require production of the records associated with case numbers **0837044560** and **834436400**, including the relevant customer service contacts and billing dispute history.
3. Direct LUMA to explain why the July 2026 billing dispute is not included among the two objections identified in its Answer.
4. Review the estimated charges for May through September 17, 2026, in light of the apartment's unoccupied status, the reported meter problem, and the supporting evidence.
5. Require an appropriate correction or credit for any charges determined to be inaccurate or unsupported.
6. Consider the merits of my complaint and the evidence presented before dismissing the matter on procedural grounds.

I have made efforts to notify LUMA of the meter problem and dispute the charges through its customer service process. I respectfully maintain that these efforts should be considered alongside LUMA's records and the evidence available to establish the actual circumstances.

I request a fair and thorough review of this matter and a determination based on the available evidence.

Respectfully submitted,

Reyes Padua

Petitioner

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Date: _____