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Monthly Report

Report #: RPT-P3A-006

For the period ending November 2020

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General Overview

In accordance with Section 4.2(b) of the Operations and Maintenance Agreement (OMA), LUMA hereby provides the P3A its monthly report on its performance of the Front-End Transition for the month ending November 30, 2020. A copy of the Handover Checklist and work performed has been provided in Appendix A of the report.

PERFORMANCE OF FRONT-END TRANSITION (FET) PERIOD

A. FET PERIOD PROGRESS REPORT

I. Key Achievements in reporting period

Overview

During the month of November, LUMA continued to progress its Front-End Transition obligations with specific focus on our work on the Initial Budgets, System Remediation and Performance Metrics as well as on our recruitment efforts. Most of the challenges noted in past reports and updated in Part C of this report remain as concerns. LUMA is also very concerned with the misalignment of PREPA as it relates to the obligations under the OMA including delays in payment to LUMA. However, despite these impacts, LUMA remains on track for a June 1, 2021 commencement of the O&M Services.

The following is a summary of the Key Achievements for the month of November and is presented based on critical areas to achieving commencement. Additional achievements and additional detail of LUMA's progress can be found in Appendix A – Handover Checklist.

Human Resources- creating a new organization

We continued our recruitment efforts of our new workforce which included the following:

- Continued our postings of positions and receiving applications. To date, LUMA has received in excess of 7,000 applications. Our work involved the initial assessment of the applications, screening interviews of PREPA employees and beginning of interviews with hiring managers.
- Continued to advance our preparation for Skills Assessments to be conducted as part of the recruitment process.
- Developed and distributed recruitment flyers and application support communications to help encourage new PREPA applicants.
- Continued to progress the implementation of the Human Capital Management system which will capture core HR information, Benefits Administration, Compensation Data and Learning Management.

Critical Regulatory Matters

LUMA has numerous operational deliverables that will be presented to the P3A and/or PREB for approval during the Front-End Transition period. Work on all these deliverables is progressing well as noted in Appendix A. The more significant achievements during the month of November are as follows:

- a. Initial Budgets, System Remediation Plan (SRP) and Performance Metrics
Continued on the work areas reported last month which involved a significant effort throughout November by all LUMA departments as they focused on the preparation of the Initial Budgets, SRP and Performance Metrics filings. This work included the prioritization and documentation of necessary operating and capital programs to meet the Transformation Objectives established by the Commonwealth. Our work was conducted within the financial realities of the current Revenue Requirement as we contemplated the physical and operational deficiencies identified as critical to remediate and transform PREPA. Our prioritization work also considered the deployment of federal funded projects.
- b. FEMA Funded Projects
With the details associated with the 10-year plan recently available from PREPA, LUMA will be reviewing and considering the plan as we finalize the Initial Budgets, System Remediation Plan and Performance Metrics filings to PREB anticipated to be submitted in early 2021.

LUMA has indicated to PREPA that with the 10-year plan completed, and in order to facilitate transition, it is critical that the execution work of the FEMA projects be undertaken in a manner conducive to the seamless transition from PREPA to LUMA as of the Commencement Date.
- c. PREPA Reorganization
LUMA continued to support the development of the GridCo-GenCo Purchase Power Operating Agreement (PPOAs) and the Shared Services Agreement while progressing the development of the System Operating Principles.

LUMA also continued to support PREPA's development of the GenCo budget – a critical input to the Initial Budgets.

Preparing LUMA for Operations

In addition to the recruitment effort and development of the Initial Budgets, SRP and Performance Metrics work, LUMA continues to work on key areas necessary to 'stand-up' LUMA from an operational perspective. These include the development of key plans as outlined in Appendix A. Some of the key highlights for November are as follows:

- a. Health, Safety, Environment & Quality
 - Continued vigilance on our COVID protocol.
 - Established key HSE policies and procedures for commencement.
 - Advanced LUMA's Business Continuity and Crisis Management program including the Emergency Response Plan.
- b. Internal & Stakeholder Communications:
 - Continued to communicate our key messages through external channels (social media) and advertising (i.e. digital mediums, billboards, print and radio), and develop plans for future social campaigns.
 - Created a LUMA's website map and developed a comprehensive customer account portal to be activated upon commencement.

- Created a monthly newsletter and application support flyer to keep PREPA employees engaged in LUMA's recruiting efforts and company culture.
 - Met with a variety of organizations across the island to explore community investment partnerships.
- c. Operational
- Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective
 - Based on the above, worked within Operations' leadership team to draft the first year's operational priorities.
 - Began the drafting process of the Standard Operating Procedures for the Operations Department.
 - Began development of the Operations Restoration Annex, for consolidation into final Emergency Response Plan noted above.
 - Commenced the recruitment effort for key positions within Distribution Operations, Transmission Operations, Fleet, Materials Management, and Vegetation Management
 - Developed first drafts of Technical Specifications of Distribution ROW Reclamation and Preventive Vegetation Maintenance.
 - Contributed to the development of safety material of the public and internal workforce.
- d. Customer Experience - Voice of the Customer
- Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective.
 - Received Bill Print and Delivery proposals. Vendor analysis is underway.
 - Met with PREPA supervisors to review work processes, IT systems and Contact Center training. These meetings were conducted instead of conducting employee observations given the inability to gain employee access.
 - Finalized the JD Power Customer Satisfaction Survey and User Acceptance Testing for sending to customers.
- e. Finance and Accounting
- Advanced the Initial Budgets process and supported the overall work prioritization effort of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective.
 - Deficiencies and opportunities identified by LUMA's Internal Controls team were presented and discussed with PREPA and LUMA's Departments to ensure alignment.
 - Completed initial configuration of Oracle EBS for GridCo and LUMA. Methodologies and processes were determined for Labor Cost Distribution.
 - Insurance policies to be in place post-Commencement were defined, establishing process needed to assure timely compliance.
 - Completion of health pre-assessments for accessible facilities including the completion of preliminary occupancy and asset information.
 - Progressed the draft of the Non-Federally Funded Procurement Manual.

- f. Information and Operational Technology
 - Workday HCM: Completed unit testing, end-to-end testing strategy & plan and test scenarios for integration.
 - Workday Payroll: Requirements gathering and design in progress for absence and payroll.
 - Kronos: Defined project plan and RACI matrix, as well as completed design workshops.
 - Cloud Based Call Center: Selected solution provider and procurement process is underway. Proceeding with a 30-day vendor trial.
- g. Other Regulatory matters (in addition to those noted above)
 - Preparation and support of relevant teams for Initial Budgets, SRP and Performance Metrics filing including the development of the Recovery and Transformation Framework for the T&D System.
 - Advanced work on the Liability Waiver to filed with PREB.
 - Continued work on the System Operation Principles, and underlying procedures for bulk power and transmission operations.
 - Continued monitoring of PREPA's "10 Year Plan" for FEMA 428 funding. Reviewed the available information on 428 and incorporated FEMA and other relevant guidance for formulation of LUMA's plans to utilize available federal funding for recovery.
 - Progressed the initial draft of Shared Services Agreement.
- h. Legal Matters
 - Refined analysis of LUMA as agent for PREPA regarding T&D real estate lease agreements, System Revenues, GridCo-GenCo PPOA.
 - Engaged in matters related to Complaint NEPR-QR-2020-0029 re: Maximo Solar Industries, Inc.

II. Key Focus Areas in upcoming month

The Front-End Transition is an on-going evolution of all efforts noted in Section I and outlined in Appendix A. In December, LUMA will continue to progress its efforts in all areas noted in Section I, so these are not repeated here. Rather, the following focuses on new noteworthy activities that LUMA will be undertaking and is presented in using the same outline as in Section I:

Human Resources- creating a new organization

- Continue LUMA's recruitment effort focused on existing PREPA employees including supporting employees with application forms and resumes, as well as systematically post jobs.
- Continue providing PREPA employees with information available.
- Continue working with PREPA management to develop and respond to employee questions to be answered by PREPA (i.e. related to items such as pension and employment options).

Significant Regulatory Matters – requiring P3A review and/or approvals and PREB approvals

- a. Initial Budgets, SRP and Performance Metrics
 - LUMA will be finalizing the draft of its Recovery and Transformation Framework, Initial Budgets, SRP and Performance Metrics and submitting to the P3A for its review and recommendation for LUMA's consideration prior to submission to PREB in early 2021.
 - LUMA will be reviewing and considering the details of PREPA's 10-year FEMA plan as we finalize the Initial Budgets, System Remediation Plan and Performance Metrics filings to PREB.
- b. FEMA Funding Projects
 - LUMA has indicated to PREPA that with the 10-year plan completed, and in order to facilitate transition, it is critical that the execution work of the FEMA projects be undertaken in a manner conducive to the seamless transition from PREPA to LUMA as of the Commencement Date. As such, LUMA anticipates beginning to participate in the appropriate meetings led by PREPA and advisors.
 - Continue gathering and evaluating PREPA's existing procurement plans, procedures, and protocols. Begin developing and updating such procedures based on best practices and applicable requirements of funding agencies, grant recipients, and applicable Puerto Rico and PREPA requirements.
 - Continue the risk assessment and begin formulating solutions for financial management, grants management, and internal controls for the administration of all funding sources.
 - Continue coordination with PREPA's Disaster Financial Management Office related to outstanding project application and project formulation requirements, including the FEMA Public Assistance 406 Mitigation opportunities.
- c. PREPA Reorganization
 - Continue supporting PREPA in the development of the GenCo 3-year budget for inclusion in the Initial Budgets.
 - Continue to support in the development of the GridCo-GenCo Operating Agreements.
 - Continue efforts to develop the Shared Services Agreement.
 - Finalize the draft of the System Operations Principles and submit to P3 for its review.

Preparing LUMA for Operations

- a. Health, Safety, Environment & Quality
 - Begin the review of the field baseline environmental site assessments results being undertaken by PREPA. Work to advance the schedule given the concerns with the current timetable.
 - Progress LUMA's Business Continuity and Crisis Management program including the Emergency Response Plan.
 - Assess applicable software systems for HSE&Q incident data collection and begin evaluation of alternatives.
- b. Internal & Stakeholder Communications:
 - Create a December communication for PREPA employees.

- Work with the LUMA Health, Safety, Environment & Quality team to develop a public safety plan, with messaging, timeline and partners.
- c. Operational
 - Continue development of the Standard Operating Procedures for the Operations Department
 - Continue furthering the overall recruitment effort for the Operations Departments.
 - Progress the drafting of the Materials Management and Warehouse Plan
- d. Customer Experience - Voice of the customer
 - Undertake the 30-day trial on the new Contact Center platform.
 - Continue furthering the overall recruitment effort for the Customer Experience Departments.
 - Advance the building consolidation recommendation plan with the Operations team and Facilities team.
 - Continue to progress the JD Power Customer Satisfaction Surveys.
 - Advance the draft of Customer Experience transition plan.
- e. Finance and Accounting
 - Completion of the Initial Budgets for filing to P3A.
 - Completion of full health assessment and first draft of property summaries.
 - Continue efforts to obtain all System Contracts from PREPA for internal review & assessment by the various LUMA Departments.
 - Finalize the Non-Federal Funded Procurement Manual for LUMA's internal review.
 - In conjunction with PREPA, hold Conference Room Pilot for Oracle EBS Project Accounting and Fixed Assets.
- f. Information and Operational Technology
 - Continue all major IT projects required for LUMA to be fully operational (e.g. EBS, Workday HCM, Call Center Technology).

III. Handover Checklist

In accordance with Section 4.2(b) of the OMA, LUMA has provided an update to the Handover Checklist in Appendix A. Appendix A supplements the above report and captures additional detail of work performed by LUMA in November.

B. COMMERCIAL REPORT

I. Completed OMA Obligations

This section represents the completed OMA obligations from the past month only. All previous month completed OMA obligations are removed to minimize the length of the report.

Section	Description	Responsible Party	Status
	There are no completed items for the month of November.		

I. Ongoing OMA Obligations

Section	Description	Responsible Party	Status
4.2(b)	ManagementCo shall provide Administrator (with copy to PREB) written monthly reports with respect to ManagementCo's performance of the Front-End Transition Services, including a copy of the Handover Checklist updated to reflect the progress of each item listed therein. From time to time during the Front-End Transition Period, in light of experience developed up to such point in the Front-End Transition Period, the Handover Checklist shall be adjusted, updated or otherwise modified by ManagementCo and Administrator, each acting reasonably, as necessary to reflect such experience.	LUMA (Operator)	Submitted - October
4.3(c)	ManagementCo, Administrator and Owner shall together (i) identify all material existing System Contracts and all Generation Supply Contracts and provide ManagementCo and Administrator with copies thereof and (ii) identify which of the material existing System Contracts and Generation Supply Contracts do not comply with the Federal Funding Requirements and provide ManagementCo and Administrator with a list thereof.	LUMA (Operator), PREPA (Owner), P3A (Administrator)	Ongoing
4.3(e)	Notices with respect to System Contracts and Generation Supply Contracts. Owner shall (i) notify each counterparty to a System Contract and Generation Supply Contract in writing of Owner's delegation of authority to Operator with respect to such System Contract in the manner contemplated by Section 5.2(a) (System Contracts – Generally) and with respect to such Generation Supply Contract in the manner contemplated by Section 5.13(a) (Generation-Related Services – Power Supply Dispatch and Management) and (ii) have obtained all required consents from such counterparties as may be required thereby in connection with such delegation of authority and (iii) take all such other actions as may be necessary for Operator to be able to comply with its obligations under Section 5.2(a) (System Contracts – Generally) and Section 5.13 (Generation-Related Services).	PREPA (Owner)	Ongoing
4.4(a)	ManagementCo, Administrator and Owner shall coordinate identifying the Governmental Approvals required for the commencement on the Service Commencement Date. Once the	LUMA (Operator) P3A (Administrator)	Ongoing

Section	Description	Responsible Party	Status
	Parties have identified the Commencement Date Governmental Approvals: (i)(A) ManagementCo shall coordinate with Owner and Administrator to prepare for and support Owner's efforts related to the transfer and assignment or the reissuance of the Commencement Date Governmental Approvals; (B) Owner, with Operator's assistance, shall submit complete applications and take all other steps necessary to obtain and maintain all required Commencement Date Governmental Approvals; and ...(ii) ManagementCo and Administrator shall cooperate with Owner in identifying, preparing, applying for, obtaining and maintaining the Commencement Date Governmental Approvals.	PREPA (Owner)	
4.6(c)(i)	(c) Operator shall deliver to Administrator an estimate of the anticipated Front-End Transition Service Fee for the following four and a half (4.5) months, subject to Section 7.8 (Owner Credit Rating).	LUMA (Operator)	Submitted - October
4.6(c)(i)	(d) Owner shall replenish the Front-End Transition Account so as to maintain a balance in the Front-End Transition Account at the end of each calendar month equal to the sum of the anticipated Front-End Transition Service Fee for the subsequent four and a half (4.5) months, subject to Section 7.8 (Owner Credit Rating), and so on subsequently until the Front-End Transition Services conclude.	PREPA (Owner)	Confirmed - October
4.6(d)(i)	Operator shall provide Administrator with a monthly invoice describing in reasonable detail the prior calendar month's Front-End Transition Services and the corresponding Front-End Transition Service Fee for such prior calendar month. All invoices shall comply with the requirements set forth in Section 9.2(c) (Anti-Corruption and Sanctions Laws – Policies and Procedures).	LUMA (Operator)	Submitted – October
4.2(j)	ManagementCo shall use commercially reasonable efforts to interview and evaluate as candidates for employment at ServCo, effective as of the Service Commencement Date, the regular employees of Owner and its Affiliates (other than Owner's generation employees, including certain administrative and plant operations personnel) who (i) are currently and remain employed by Owner and its Affiliates (other than Owner or its Affiliates generation station employees) as of the Interview Deadline or are hired by Owner or its Affiliates on or after the Effective Date in the ordinary course of business consistent with the past practices of Owner and its Affiliates to replace any existing employee of Owner, and (ii) apply to ServCo in a job category ServCo wishes to fill (collectively, the "Owner Employees"). For the avoidance of doubt, neither ManagementCo nor ServCo shall be liable for severance or other pay or benefits for Owner Employees who are not hired by ServCo, including those to whom an offer of employment is made but who do not accept such offer. Owner and its Affiliates shall waive any non-competition, confidentiality or other obligation arising under any employment contract between Owner or Affiliate and any Owner Employee that may otherwise restrict any of Owner Employee's rights to be employed by ServCo. Owner shall provide ManagementCo	LUMA (Operator)	Ongoing

Section	Description	Responsible Party	Status
	with the following information regarding Owner Employees promptly on request: (x) job description for current and any prior positions occupied by such Owner Employee, (y) date of employment and (z) current salary.		

II. Overdue OMA Obligations

Section	Description	Responsible Party	Status
4.3(d)(i)	Additional System Contracts and Generation Supply Contracts Between Effective Date and Service Commencement Date. During the Front-End Transition Period, the Parties agree that it is the intent that Owner and Administrator shall not amend or enter into any new System Contracts or Generation Supply Contracts; provided, however, that: prior to the date ManagementCo submits the Initial Budgets to PREB for its approval, if Owner and Administrator identify a need to do so, then Administrator shall notify ManagementCo of such need and work with ManagementCo to implement any such amendment or new System Contract or Generation Supply Contract. Following such consultation process, Administrator shall ultimately determine if such amendment or new System Contract or Generation Supply Contract is required.	P3A (Administrator) PREPA (Owner)	Currently the parties are generally aware of System Contracts work being undertaken; however, there is no systematic process ensuring that all parties are clear of all FET System Contracts activities.
4.1(b)(i)	Each of Owner and Administrator shall take all such actions as may reasonably necessary to enable or assist ManagementCo in providing the Front-End Transition Services, including (i) providing ManagementCo's Representatives with a designated space and facilities at Owner's principal offices for their use throughout the Front-End Transition Period.	PREPA (Owner)	Substantially overdue
4.1(b)(iii)	Each of Owner and Administrator shall take all such actions as may be reasonably necessary to enable or assist ManagementCo in providing the Front-End Transition Services, including... (i) cooperating with and assisting, and causing its Representatives to cooperate with and assist, ManagementCo in its performance of the Front-End Transition Services and its efforts to timely satisfy the ManagementCo Service Commencement Date Conditions.	PREPA (Owner)	Several RFIs submitted by LUMA remain outstanding (68 of 303 with some up to 100+ days). RFI status provided to PREPA weekly.
4.6(d)(iii)	Payments of undisputed amounts under any invoice shall be due within thirty (30) days of Administrator's receipt of such invoice.	P3A (Administrator) PREPA (Owner)	Outstanding payment due to misalignment of PREPA

III. OMA Obligations in Progress

Section	Description	Responsible Party	Status
4.3(d)	(iii) a Tax Opinion and a Reliance Letter shall have been obtained, at the expense of Owner or Administrator, with respect to any System Contract that is a Covered Contract and is entered	P3A (Administrator)	In progress

Section	Description	Responsible Party	Status
	into, extended or amended after the Effective Date. Owner shall promptly deliver to Operator a copy of each executed System Contract entered into pursuant to clauses (i) and (ii) above.		
4.3(k)	Owner shall prepare and provide Operator a description and demarcation of the T&D System. The Parties will jointly consider any amendments, adjustments and refinements to Annex XII (Insurance Specifications) in light of the description and demarcation of the T&D System.	PREPA (Owner)	In progress
4.4(b)	From and after the Effective Date, the Parties agree that: Operator shall seek a Tax Assurance and (ii) at Operator's expense, Owner and Administrator shall cooperate with Operator and use their commercially reasonable efforts to support and assist Operator in securing such Tax Assurance.	LUMA (Operator)	In progress
4.5 (t)(i)	Operator and the Secretary of the Puerto Rico Treasury Department shall have entered into a closing agreement in form and substance satisfactory to Operator, acting reasonably, executed pursuant to Section 6051.07 of the PRIRC among Operator, the Equity Participants and the Puerto Rico Treasury Department that (A) incorporates all matters set forth in administrative determination No. 20-06 issued by the Secretary of the Puerto Rico Treasury Department (the " <u>Administrative Determination</u> ") that are applicable to Operator and the Equity Participants and (B) provides that (x) the Front-End Transition Service Fixed Fee, the Service Fee and the Back-End Transition Service Fee are treated in the same manner as management fees are treated under Section III(A) of the Administrative Determination and (y) the Operator Termination Fee is treated in the same manner as termination payments are treated under Section III(A) of the Administrative Determination;	LUMA (Operator)	In progress
4.5 (s)	The Parties shall mutually develop and negotiate in good faith a shared services agreement consistent with the provisions set forth in Annex VI (GenCo Shared Services) (the "Shared Services Agreement"), which agreement shall provide the terms and conditions pursuant to which Operator, as agent of Owner, shall provide the GenCo Shared Services to GenCo until the Legacy Generation Assets are retired or until certain of GenCo's operations, including the operating, administrative and/or maintenance functions related to the Legacy Generation Assets, are transferred to one or more private partners, the term of which agreement not to exceed three (3) years from its effective date (unless otherwise extended with the consent of Operator).	LUMA (Operator) P3A (Administrator) PREPA (Owner)	P3A counsel delivered a first draft of SSA which is being reviewed and revised by LUMA

IV. Upcoming OMA Obligations

Section	Description	Responsible Party	Status
4.1(d) (i) and (ii)	ManagementCo to - (C) submit such System Remediation Plan to Administrator for its review and approval, acting reasonably. The System Remediation Plan shall detail the scope, resources, timelines, milestones, costs estimates and achievement criteria for each activity or project required to enable Operator to perform the O&M Services in compliance with Contract	LUMA (Operator)	Planned to submit to P3A in mid-December

Section	Description	Responsible Party	Status
	Standards, including the deadlines by which each such activity or project shall be fully implemented. The Parties acknowledge and agree that any prior studies or reports of Owner relating to the remediation, repair, replacement and stabilization of the T&D System may be considered for purposes of preparing the System Remediation Plan, but the findings of such studies or reports shall not limit the Parties' discretion to develop the System Remediation Plan.		
4.1(g)	Parties to apply for Liability Waiver with Rate Order in connection with submission of Initial Budgets.	LUMA (Operator), PREPA (Owner), P3A (Administrator)	Planned to submit to P3A in mid-December
4.1(h)	ManagementCo to - (ii) submit such proposed System Operation Principles to Administrator for its review and approval.	LUMA (Operator)	Planned to submit to P3A in mid-December
4.2(e)	(a) ManagementCo shall prepare and submit to Administrator the proposed Initial Budgets; provided that for purposes of the Generation Budget, ManagementCo shall only be required to submit (if received by ManagementCo) the Generation Budget as prepared by Owner and delivered to ManagementCo by Owner. ManagementCo shall have a reasonable time to review such Generation Budget prior to completing and submitting the balance of the Initial Budgets to Administrator hereunder.	LUMA (Operator)	Planned to submit to P3A in mid-December
4.2(f)	(b) ManagementCo shall submit to Administrator the proposed revised Performance Metrics	LUMA (Operator)	Planned to submit to P3A in mid-December

C. RISK AND ISSUE MANAGEMENT REPORT

I. Risks with Potential to Materially Impact Project Success

Risk	Description and Current Status (as of 11-30-20)
PREPA Reorganization (s. 4.5(q))	<p>LUMA notes that there remains a considerable effort necessary to complete the reorganization of PREPA. LUMA views the PREPA reorganization includes ensuring the Governance structure, GridCo-GenCo Operating agreement, System Operating Principles and the Shared Services Agreement all tie together.</p> <p>Work is progressing on all fronts; however, risk remains the timeliness of achieving the obligation which includes obtaining the necessary Governmental approvals as a condition precedent to commencement.</p> <p>Associated with the PREPA reorganization is the development of the GenCo's budgets by PREPA for incorporation into the Initial Budgets anticipated to be submitted to PREB in early 2021 for approval. LUMA continues to support PREPA in this effort.</p>
FEMA Funding	<p>With the details associated with the 10-year plan now available, LUMA will be reviewing and considering the details of the plan as we finalize the Initial Budgets, System Remediation Plan and Performance Metrics filings to PREB anticipated to be submitted in early 2021.</p> <p>LUMA's initial assessment is one of concern given the 10-year plan is not consistent with the Certified Fiscal Plan nor the executed OMA with LUMA in that there is little or no mention of LUMA's role post Service Commencement. It is imperative that following Service Commencement under the LUMA OMA, responsibility for planning and execution of all T&D related work including FEMA work will reside with LUMA.</p> <p>LUMA believes this starts now and has indicated to PREPA that with the 10-year plan completed that in order to facilitate transition, it is critical that the execution work of the FEMA projects be undertaken from now until Commencement be conducted in a manner conducive to the seamless transition from PREPA to LUMA as of the Commencement Date. Without this cooperation, there is a significant risk of critical disconnect and delays in work upon commencement.</p>
COVID-19 Pandemic	<p>The COVID-19 pandemic continues to create challenges for LUMA.</p> <p>LUMA is following an appropriate COVID Protocol and using virtual tools including Microsoft Teams for meetings helps communications but consumes significantly more time and less productive.</p>

Risk	Description and Current Status (as of 11-30-20)
Field Access	Limitations on being able to access field employees to create relationships, observe work, inquire about issues due to union actions has created a challenge for LUMA and PREPA Management. In many cases PREPA employees have been unwilling to cooperate with any requests from LUMA. This situation continues to be a significant issue that has impacted LUMA's ability to formulate comprehensive budgets and workplan to cutover upon commencement.
Designated Space & Facilities (s. 4.1 (b))	Establishing furnished workspace continues to be a concern. LUMA staff continues to work away from the office leading to inefficiencies and increased cost. PREPA most recent plan to provided adequate spacing has been delayed further.
Response to RFIs	LUMA has now issued 303 Requests for Information (RFIs) of PREPA since June 22 nd . As of the reporting date, there is currently 68 RFIs outstanding in some cases up to 100+ days since being issued. This continues to be an issue that will impact LUMA's ability to form a complete understanding of operations, formulate comprehensive budgets and develop workplans to cutover upon commencement.

II. Active Issues with Potential to Materially Impact Project Success

Issue	Description, Current Status and Mitigation
LUMA Recruitment Effort	No update from our last report. The desire to provide PREPA employees a complete picture of employment options and pension information has not materialized. (Note these issues represent the majority of the questions that LUMA & PREPA are hearing from PREPA employees since Effective Date). While LUMA appreciates that this is a complicated involving multiple parties, LUMA remains concerned that the relevant information will not be available from PREPA and will impact employee's decision thereby limiting the recruitment effort.
Pre-existing Environmental Conditions (s.4.5 (f))	This contract has now been finalized and desktop work has begun with field work anticipated to begin in mid-December. LUMA continues to monitor progress and has noted that the current schedule for completion is extremely tight given the completion of the work is a Condition Precedent to the June 1 st Commencement Date. The current schedule suggests a May 20 th completion.

D. FINANCIAL PROGRESS REPORT

In accordance with s.4.6(d), LUMA has submitted the invoice for the FET Service Fee for the month of November 2020. A summary of the invoice amounts is included below.

I. Monthly invoice summary

FET COSTS	
Department	Amount
Capital Programs	\$108,550
Communications	\$56,062
Corporate Services	\$61,250
Customer Service	\$148,325
Executives	\$71,887
Financial Mgmt.	\$401,027
HSE & Quality	\$218,528
Human Resources	\$215,135
Integration Mgmt. Office	\$206,313
IT / OT	\$289,200
Legal	\$36,750
Operations	\$481,938
Regulatory	\$174,190
Utility Transformation	\$1,019,173
TOTAL	\$3,488,328

	FET Hourly Costs	Additional Costs & Expenses	Sub-Total	FET Fixed Fee	Total
Previously invoiced	\$17,674,490	\$14,529,258	\$32,203,748	\$21,500,000	\$53,703,748
Current invoice	\$3,488,328	\$4,645,366	\$8,133,694	\$5,000,000	\$13,133,694
Total invoiced to date	\$21,162,818	\$19,174,624	\$40,337,442	\$26,500,000	\$66,837,442
Forecast to complete			\$36,014,489	\$33,500,000	\$69,514,489
Proposal			\$76,351,931	\$60,000,000	\$136,351,931
Variance			-	-	-

E. SUBMISSIONS

I. Transmittals – Current Month November 2020

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Created
LUMA-P3A-T-00056	FTI August 2020 Report Inquiries	LUMA	P3A	IMO	1-Nov-20
LUMA-P3A-T-00057	August 2020 Monthly Invoice & Report (Revised)	LUMA	P3A	IMO	9-Nov-20
LUMA-P3A-T-00058	October 2020 Monthly Invoice & Report	LUMA	P3A	IMO	10-Nov-20
LUMA-P3A-T-00059	October 2020 Monthly Status Report	LUMA	P3A	IMO	10-Nov-20
LUMA-P3A-T-00060	October 2020 Renewed Certificates	LUMA	P3A	IMO	10-Nov-20
LUMA-P3A-T-00061	4.5 Months of FETS Estimate October 2020	LUMA	P3A	IMO	10-Nov-20
LUMA-P3A-T-00062	October 2020 Renewed Certificates - Social Security, Unemployment and Disability	LUMA	P3A	IMO	10-Nov-20
LUMA-P3A-TGC-00063	P3A / LUMA October 27, 2020 Meeting Notes	LUMA	P3A	IMO	11-Nov-20
LUMA-P3A-TGC-00064	P3A / LUMA November 12, 2020 Meeting Agenda	LUMA	P3A	IMO	11-Nov-20
LUMA-P3A-T-00065	4.5 Month FETS Estimate October 2020 (wActuals)	LUMA	P3A	IMO	18-Nov-20
LUMA-P3A-T-00066	October 2020 Renewed Certificates - LUMA ManageCo Debt Certification	LUMA	P3A	IMO	18-Nov-20
LUMA-P3A-TGC-00067	P3A / LUMA November 12, 2020 Meeting Notes	LUMA	P3A	IMO	20-Nov-20
LUMA-P3A-TGC-00068	P3A / LUMA November 23, 2020 Meeting Agenda	LUMA	P3A	IMO	20-Nov-20
LUMA-P3A-T-00069	Key Dates Schedule	LUMA	P3A	IMO	20-Nov-20
LUMA-P3A-T-00070	Transaction Costs - 2022 to 2024	LUMA	LUMA	IMO	20-Nov-20
LUMA-P3A-T-00071	4.5 Month FETS Estimate November 2020	LUMA	P3A	IMO	25-Nov-20
LUMA-PREB-T-00020	October 2020 Monthly Status Report	LUMA	PREB	IMO	10-Nov-20
LUMA-PREP-TGC-00045	PREPA / LUMA Biweekly Meeting Agenda 2020-11-06	LUMA	PREPA	IMO	6-Nov-20
LUMA-PREP-TGC-00046	PREPA / LUMA Biweekly Meeting Notes 2020-10-20	LUMA	PREPA	IMO	6-Nov-20
LUMA-PREP-T-00047	Outstanding RFIs as of November 6, 2020	LUMA	PREPA	IMO	6-Nov-20
LUMA-PREP-T-00048	October 2020 Monthly Status Report	LUMA	PREPA	IMO	10-Nov-20
LUMA-PREP-T-00049	Outstanding RFIs as of November 13, 2020	LUMA	PREPA	IMO	13-Nov-20

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Created
LUMA-PREP-TGC-00050	PREPA / LUMA Biweekly Meeting Notes 2020-11-06	LUMA	PREPA	IMO	13-Nov-20
LUMA-PREP-TGC-00051	PREPA / LUMA Biweekly Meeting Agenda 2020-11-16	LUMA	PREPA	IMO	13-Nov-20
LUMA-PREP-TGC-00052	LUMA Sales & Use Tax Exemption / Excise Tax Exemption	LUMA	PREPA	IMO	16-Nov-20
LUMA-PREP-T-00053	SUT Exemption Certification	LUMA	PREPA	IMO	17-Nov-20
LUMA-PREP-T-00054	Outstanding RFIs as of November 20, 2020	LUMA	PREPA	IMO	18-Nov-20
LUMA-PREP-T-00055	Application Support Communication	LUMA	PREPA	IMO	24-Nov-20
LUMA-PREP-TGC-00056	PREPA / LUMA Biweekly Meeting Notes 2020-11-16	LUMA	PREPA	IMO	25-Nov-20
LUMA-PREP-TGC-00057	PREPA / LUMA Biweekly Meeting Agenda 2020-11-30	LUMA	PREPA	IMO	25-Nov-20
LUMA-PREP-T-00058	Outstanding RFIs as of November 27, 2020	LUMA	PREPA	IMO	25-Nov-20
LUMA-PREP-T-00059	FEMA Plan - First Batch of Standards 2020-10-26	LUMA	PREPA	Utility Transformation	30-Nov-20

II. Requests for Information (RFIs) – Current Month November 2020

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00227	Customer Service Directorate processes & procedures	LUMA	PREPA	Customer Service	2-Nov-20	13-Nov-20	4-Nov-20	Closed
LUMA-PREP-RFI-00228	AED Inventory	LUMA	PREPA	HSE & Quality	2-Nov-20	30-Nov-20		Open
LUMA-PREP-RFI-00229	Kronos PM Randy Smandych	LUMA	PREPA	IT/OT	2-Nov-20	5-Nov-20	16-Nov-20	Closed
LUMA-PREP-RFI-00230	Provide the following system user access - Ramprasad Ghosh	LUMA	PREPA	IT/OT	2-Nov-20	6-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00231	On Ramp system and Meter Data Service types	LUMA	PREPA	Utility Transformation	2-Nov-20	6-Nov-20		Open
LUMA-PREP-RFI-00232	TWACS DB extracts	LUMA	PREPA	Utility Transformation	2-Nov-20	6-Nov-20		Open
LUMA-PREP-RFI-00233	Telepago	LUMA	PREPA	Customer Service	2-Nov-20	13-Nov-20		Open
LUMA-PREP-RFI-00234	Equipment Hours	LUMA	PREPA	Financial Management	2-Nov-20	2-Nov-20		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00235	COR3 and/or FEMA guidance on the requirements and contents	LUMA	PREPA	Regulatory	3-Nov-20	4-Nov-20		Open
LUMA-PREP-RFI-00236	Current outline(s) of report for 10-year plan and for the 2021 projects	LUMA	PREPA	Regulatory	3-Nov-20	4-Nov-20		Open
LUMA-PREP-RFI-00237	Sargent & Lundy write up on grid reconstruction strategy	LUMA	PREPA	Regulatory	3-Nov-20	4-Nov-20		Open
LUMA-PREP-RFI-00238	Copy e-billing notification email to customers	LUMA	PREPA	Customer Service	4-Nov-20	10-Nov-20	1-Dec-20	Closed
LUMA-PREP-RFI-00239	Copy of Net Metering Bill	LUMA	PREPA	Customer Service	4-Nov-20	10-Nov-20	1-Dec-20	Closed
LUMA-PREP-RFI-00240	Mini Gupta - RICE Developer & Functional Resource	LUMA	PREPA	IT/OT	4-Nov-20	9-Nov-20	16-Nov-20	Closed
LUMA-PREP-RFI-00241	Mi Cuenta Architecture and Roadmap	LUMA	PREPA	IT/OT	5-Nov-20	9-Nov-20	26-Nov-20	Closed
LUMA-PREP-RFI-00242	Work volumes for substations	LUMA	PREPA	Operations	5-Nov-20	19-Nov-20		Open
LUMA-PREP-RFI-00243	Substation available fault current	LUMA	PREPA	Operations	5-Nov-20	19-Nov-20		Open
LUMA-PREP-RFI-00244	Account numbers on the collections reports	LUMA	PREPA	Customer Service	5-Nov-20	19-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00245	Date confirmation for Meters	LUMA	PREPA	Utility Transformation	5-Nov-20	9-Nov-20		Open
LUMA-PREP-RFI-00246	Contract PDF and IT Contract Report Run Weekly	LUMA	PREPA	IT/OT	5-Nov-20	5-Nov-20		Open
LUMA-PREP-RFI-00247	Balance in FERC accounts for original cost and accumulated depreciation.	LUMA	PREPA	Financial Management	6-Nov-20	30-Nov-20		Open
LUMA-PREP-RFI-00248	Current Internal Controls Framework	LUMA	PREPA	Financial Management	6-Nov-20	20-Nov-20		Open
LUMA-PREP-RFI-00249	Scripts/Scenarios for testing Billing	LUMA	PREPA	IT/OT	10-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00250	FCC Operators License	LUMA	PREPA	Operations	10-Nov-20	1-Dec-20		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00251	Microwave Radio's	LUMA	PREPA	Operations	10-Nov-20	1-Dec-20		Open
LUMA-PREP-RFI-00252	Citrix Connection & Stand-alone Laptop to access Asset Suites	LUMA	PREPA	IT/OT	10-Nov-20	17-Nov-20	17-Nov-20	Closed
LUMA-PREP-RFI-00253	PREPA customer account by municipality from CC&B	LUMA	PREPA	Customer Service	10-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00254	Document Request	LUMA	PREPA	IT/OT	11-Nov-20	16-Nov-20		Open
LUMA-PREP-RFI-00255	Questions re: 12S and 25S meter data	LUMA	PREPA	Customer Service	11-Nov-20	13-Nov-20	13-Nov-20	Closed
LUMA-PREP-RFI-00256	Asset Suite - Setup by Company	LUMA	PREPA	IT/OT	11-Nov-20	13-Nov-20		Open
LUMA-PREP-RFI-00257	Create Asset Suite Test Environment	LUMA	PREPA	IT/OT	12-Nov-20	20-Nov-20		Open
LUMA-PREP-RFI-00258	PREPA's Mobile Substations Status	LUMA	PREPA	Operations	12-Nov-20	30-Nov-20	23-Nov-20	Closed
LUMA-PREP-RFI-00259	Citrix Connection & Stand-Alone Laptop with PREPA Network Connection	LUMA	PREPA	IT/OT	12-Nov-20	17-Nov-20		Open
LUMA-PREP-RFI-00260	Meeting Request re: Employee ID numbers	LUMA	PREPA	IT/OT	12-Nov-20	18-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00261	New User Access - Susan Pascual HR Resource	LUMA	PREPA	IT/OT	12-Nov-20	13-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00262	Asset Suite Engagement	LUMA	PREPA	IT/OT	12-Nov-20	18-Nov-20		Open
LUMA-PREP-RFI-00263	Establish SFTP for file transfer	LUMA	PREPA	IT/OT	13-Nov-20	20-Nov-20		Open
LUMA-PREP-RFI-00264	Genesys application test on PREPA network	LUMA	PREPA	IT/OT	16-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00265	Active PREPA emails addresses for employees in the Customer Service Directorate	LUMA	PREPA	Customer Service	17-Nov-20	1-Dec-20	30-Nov-20	Closed
LUMA-PREP-RFI-00266	Meter Data	LUMA	PREPA	Customer Service	17-Nov-20	20-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00267	CC&B data	LUMA	PREPA	Customer Service	17-Nov-20	19-Nov-20		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00268	Inventory of satellite phones currently available	LUMA	PREPA	Operations	18-Nov-20	27-Nov-20		Open
LUMA-PREP-RFI-00269	Customer Service Directorate	LUMA	PREPA	Customer Service	18-Nov-20	1-Dec-20		Open
LUMA-PREP-RFI-00270	Materials Inventory	LUMA	PREPA	Regulatory	18-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00271	Meals and Mileage	LUMA	PREPA	Regulatory	18-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00272	428 PW CIP Reporting	LUMA	PREPA	Regulatory	18-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00273	Standard Quarterly Performance Reporting	LUMA	PREPA	Regulatory	18-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00274	Routine/regular PW spend/progress reviews	LUMA	PREPA	Regulatory	18-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00275	Cálculos y Análisis de SAIDI y SAIFI	LUMA	PREPA	Operations	18-Nov-20	27-Nov-20		Open
LUMA-PREP-RFI-00276	COR3/FEMA guidance and requirements	LUMA	PREPA	Regulatory	19-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00277	Projects not yet formulated and/or Obligated	LUMA	PREPA	Regulatory	19-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00278	Reimbursement Process	LUMA	PREPA	Regulatory	19-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00279	Closeout Process	LUMA	PREPA	Regulatory	19-Nov-20	24-Nov-20		Open
LUMA-PREP-RFI-00280	Process/Procedure documents for new customer distribution extensions	LUMA	PREPA	Operations	19-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00281	AVL fleet GPS	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00282	GIS access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20		Open
LUMA-PREP-RFI-00283	GIS (G/Tech) access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20		Open
LUMA-PREP-RFI-00284	OMS access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00285	RFI PDSTORMS access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20	25-Nov-20	Closed
LUMA-PREP-RFI-00286	STORMS access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20		Open
LUMA-PREP-RFI-00287	Inetdispatcher access	LUMA	PREPA	Operations	19-Nov-20	27-Nov-20		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00288	S&L study of renewable integration to transmission system	LUMA	PREPA	Regulatory	19-Nov-20	4-Dec-20	25-Nov-20	Closed
LUMA-PREP-RFI-00289	PLS-Tower “.bak” files	LUMA	PREPA	Utility Transformation	19-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00290	Task number for project transactions in Asset Suite for commencement	LUMA	PREPA	Financial Management	23-Nov-20	30-Nov-20		Open
LUMA-PREP-RFI-00291	10-year FEMA plan document presented to the Contracting and Recovery Committee	LUMA	PREPA	Regulatory	23-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00292	10-year FEMA plan document presented to the DOE coordination call “TCT”	LUMA	PREPA	Regulatory	23-Nov-20	25-Nov-20		Open
LUMA-PREP-RFI-00293	Copy of the S&L study/presentation for two generator connection DCDs. DER and solar	LUMA	PREPA	Regulatory	23-Nov-20	2-Dec-20		Open
LUMA-PREP-RFI-00294	PREPA VPN & EBS access - Sohini, Saha	LUMA	PREPA	IT/OT	24-Nov-20	1-Dec-20		Open
LUMA-PREP-RFI-00295	SOA 12c Test & Dev Instance	LUMA	PREPA	IT/OT	24-Nov-20	30-Nov-20		Open
LUMA-PREP-RFI-00296	Oracle EBS Security Roles	LUMA	PREPA	IT/OT	24-Nov-20	4-Dec-20		Open
LUMA-PREP-RFI-00297	Project development / testing support	LUMA	PREPA	IT/OT	24-Nov-20	30-Nov-20		Open
LUMA-PREP-RFI-00298	Create LUMA Kronos 8.1 Test Instance/environment	LUMA	PREPA	IT/OT	25-Nov-20	4-Dec-20		Open
LUMA-PREP-RFI-00299	Mi Cuenta test environment access	LUMA	PREPA	IT/OT	25-Nov-20	5-Dec-20		Open
LUMA-PREP-RFI-00300	Fleet	LUMA	PREPA	Operations	26-Nov-20	12-Dec-20		Open
LUMA-PREP-RFI-00301	Fleet Asset Register	LUMA	PREPA	Operations	26-Nov-20	12-Dec-20		Open
LUMA-PREP-RFI-00302	Fleet: 3rd Party Services	LUMA	PREPA	Operations	26-Nov-20	12-Dec-20		Open
LUMA-PREP-RFI-00303	Create CC&B Test Environment	LUMA	PREPA	IT/OT	30-Nov-20	9-Dec-20		Open

APPENDIX A – HANDOVER CHECKLIST

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
1	General & Transition Management	<p>The transition will be managed by the Chief Executive Officer (CEO) who will be accountable for the completion and execution of all workstream deliverables and key contract elements. The CEO will be supported by a Program / Integration Management office and several Department Heads accountable for specific functional work areas.</p> <p>This overall deliverable captures efforts that are not reasonably attributable to specific Handover Checklist items given the general management nature of the work.</p>	41-50%	<p>The work in November included the general management of the requirements of the OMA including the oversight and coordination of the Handover Checklist deliverables as part of the Front-End Transition Services. This resulted in effort from all departments that cannot be reasonably attributable to specific Handover Checklist items given the general management nature of the work.</p> <ul style="list-style-type: none"> - In addition to the general management efforts noted above, there are more specific activities that were completed: <ul style="list-style-type: none"> + Administrative and logistics work required to support the ongoing work of LUMA. + Continued general management & coordination of overall Initial Budgets, SRP, Performance Metrics and regulatory strategy to support the submission to P3A & PREB. + Overall project management including efforts such as document controls (RFI & transmittal) and the preparation of the required invoicing & reporting. + Worked with PREPA and the P3A to coordinate the Front End Transition Services including regular meetings with the PREPA leadership, the PREPA Governing Board and the Administrator leadership team. + On-going collaborated with PREPA to obtain and setup access to PREPA offices. + Continued efforts expended to manage areas related to the requirements of the COVID-19 pandemic.
1.01	Government Approvals	<p>Governmental Approvals shall continue to name Owner as the permittee or applicant and Operator shall only be a co-permittee, co-applicant, co-permittee or co-applicant if and to the extent required by Applicable Law. Management Co and Administrator shall cooperate with Owner in good faith in identifying, preparing, applying, for obtaining and maintaining the Commencement Date Governmental Approvals.</p>	31-40%	<ul style="list-style-type: none"> - Finalized the document requested by the Department of Natural Resources with respect to permits under its authority. These include the majority of the permits required pre-commencement. - Received approval from PREB of LUMA as Electric Service Company.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
1.02	Plan to Address Gaps in Assets, Technology, Processes, etc. (plan to include cost estimates)	This deliverable captures the general oversight of the gap assessments to be conducted early during the Front-End Transition and captures efforts not specifically attributable to Handover Checklist deliverables including the overall development of methodology and management of progress.	91-99%	<ul style="list-style-type: none"> - Finalizing consolidation efforts by departments of gap assessments findings into the Initial Budgets /System Remediation Plan worksheets as required by the overall effort. - Continued gap assessment with PREPA including incorporation of work observations. - Continued to manage the Request for Information requests & responses related to gap assessments. <p>Note: refer to 3.02 & 3.04 which capture the evolution from gap assessments (1.02), to initiative development (3.02); and to System Remediation Plan development (3.04)</p>
1.03	PREB Rate Order Filing (Initial Budgets and Liability Waiver approvals)	Activities to gain P3A and regulatory (PREB) approvals for Initial Budgets.	41-50%	<ul style="list-style-type: none"> - Continued focus on preparation of the Initial Budgets, SRP and Performance Metrics filings. Activities included review of schedule templates for operating expenditures; review and prioritization of capital programs; and review and working with teams on drafting of key program narrative sections. - Collaborated with PREPA and its advisors to check on consistency of budget projections with existing tariff and fiscal plan requirements, including updates of key macro assumptions and financial projections based on different scenarios. - Worked with our generation team supporting PREPA's work on the GenCo budget, including validation of assumptions for GridCo - GenCo split and allocation of corporate expenditures and projections for Shared Service costs. - Reviewed with our legal team preliminary materials for Liability Waiver and potential filing structure.
2	T&D Services Milestones			
2.01	Development and Implementation of an Operations Takeover Plan for Transmission and Sub-Transmission Inside and Outside of the Plant	This deliverable includes developing an operation takeover plan for transmission and sub-transmission inside and outside of the plant. Activities include assessments of IRP Requirements, safety and reliability priorities, plans for outage and weather monitoring, and operational contingency plans.	51-60%	<ul style="list-style-type: none"> - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from and O&M and capital perspective. - Advanced the drafts of the Program Briefs for Transmission & Sub-transmission programs/projects for inclusion in the Initial Budgets/SRP submission. - Worked with Operations and System Operations to validate the requirements for the Transmission Takeover plan.
2.02	Development and Implementation of an Operational Takeover Plan for the Electric Distribution System	This deliverable involves developing and implementing an operational takeover plan for the Electric Distribution System consisting of an IRP review, distribution system reliability and safety priority assessments, critical asset life cycle plan and asset maintenance assessments, distribution automation and energy loss reduction plans, and street light operations and repair strategy.	51-60%	<ul style="list-style-type: none"> - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from and O&M and capital perspective. - Advanced the drafts of the Program Briefs for Distribution programs/projects for inclusion in the Initial Budgets/SRP submission. - Began review of Distribution Generation interconnection processes.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
				<ul style="list-style-type: none"> - Worked with Operations, Engineering and System Operations to validate the requirements for the Distribution Takeover plan.
2.03	<i>Development and Implementation of Additional Takeover plans</i>			
2.0301	Transition Plan for T&D Control Centers	This deliverable includes delivering an Operations Control Center Transition Plan that includes an evaluation of the control center physical condition, T&D outage planning and operation procedures, T&D restoration plan, and energy management system.	51-60%	<ul style="list-style-type: none"> - Continued efforts focused on defining System Operations projects scopes and budgets for the Initial Budgets/SRP including classifying projects by CAPEX vs. OPEX and identifying projects potentially being funded through FEMA. - Continued to support the ongoing efforts on developing the System Operating Principles in collaboration with our Regulatory team. - Began recruitment effort for Control Centers specifically focused on shift personnel positions which were posted. Began screening interviews. Also, progressed System Operations management layer positions in preparation for posting.
2.0302	Transition Plan for Operations and Maintenance (O&M) Activities	This deliverable consists of developing and implementing an operation take-over plan for transmission and sub transmission assets outside and inside of legacy PREPA power plants and substations, and for the electric distribution system; developing a new structure for the commencement organization with new job descriptions; and the process of interviewing, assessing, and hiring employees.	21-30%	<ul style="list-style-type: none"> - Completed some adjustment to Job Descriptions for Distribution Operations, Transmission Operations, and Operational Excellence. - Began the recruitment by beginning with some screening interviews, and follow-up technical interviews, for several supervisory roles within Distribution and Transmission Operations. - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective from an overall Operations perspective taking into account and supporting Distribution, Transmission, Fleet, Materials Management, Operational Excellence, and Vegetation Management. - Advanced the drafts of the Program Briefs from an overall Operations perspective for inclusion in the Initial Budgets/SRP submission.
2.0303	Emergency Response/Disaster Recovery/Business Continuity Plans	This deliverable involves updating the emergency response/disaster recovery and business continuity plans. Activities include working with existing PREPA operational teams to review existing operations manual, comparing it against industry best practices, LUMA's existing operations manuals, and PREPA's current plan, to identify gaps and opportunities; developing an operating manual that meets high quality standards while incorporating Puerto Rico's unique operating needs. Fundamental principles include safety,	11-20%	<ul style="list-style-type: none"> - Conducted multiple meetings with Commonwealth and Federal stakeholders to include FEMA, to identify previous and potential future power restoration issues and concerns. The discovery information is being used to develop the LUMA ERP restoration priorities. - Conducted meetings with local groups (e.g. hospital association) regarding concerns from Hurricanes Irma and Maria in developing the LUMA ERP. - Continued meetings with departmental business continuity/crisis management leaders to define next steps and

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
		customer centricity, affordability, reliability, resilience and sustainability.		<p>deliverables ensuring alignment with current process in place.</p> <ul style="list-style-type: none"> - Began development of first draft of the ERP. - Reviewed FEMA guidance documentation <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.04 and 9.02).</p>
2.0304	Fleet Management Plan	This deliverable identifies gaps within the Fleet Management Information System (FMIS), Fleet Preventative Maintenance Program, Vehicle Insurance & Registration, Effectiveness of Shop Operations, Current Suppliers, GPS / Telematics, Fuel Procurement and Fuel tracking, and, develop a prioritized plan for closing identified gaps.	41-50%	<ul style="list-style-type: none"> - Work continued on the Fleet Management Plan, pushing to get it through to the next version for review. - Began development of Standard Operating Procedures for Fleet Management. - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Fleet Management Program Briefs for inclusion in the Initial Budgets/SRP submission. - Have begun the process and made progress in the recruitment of key positions within Fleet Management.
2.0305	Asset Management	This deliverable consists of developing an Engineering Asset Management Plan that includes assessments of geospatial asset tracking, power flow process, computerized maintenance management system (CMMS), and T&D system planning criteria, as well as developing plans for preventative maintenance, substation flooding resiliency, and microgrid engagement priorities and interconnection process plans.	41-50%	<ul style="list-style-type: none"> - Worked with internal stakeholders to incorporate the Initial Budgets/SRP work prioritization efforts into the asset management plan. - Conducted research into industry practices for screening of microgrid locations. - Incorporating the Initial Budgets/SRP work prioritization work in the asset management plan.
2.0306	Workforce Management & Training Plan	This deliverable involves a comprehensive assessment of PREPA's safe work rules, technical training facilities, curriculum, and instructors allows LUMA to develop a holistic technical training program, increasing workplace safety and efficiency while defining a career path for all skilled labor employees.	51-60%	<ul style="list-style-type: none"> - Completed operational gap assessment including incorporation of observations. - Skilled Labor Assessment (SLA) process flow finalized and roles/responsibilities defined and documented. - Completed ~75% of the Skilled Labor Assessment schedule and tools (curriculum, glossary of terms, etc.). - Continued to advance locations for Skilled Labor Assessment sites including work on the lease agreements and necessary permitting. <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist item 8.07)</p>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
2.0307	Safety Management Plan	This deliverable includes the development of the Public Safety Program Assessment, Written Safety & Health Program Assessment, and Physical Safety & Health Assessment that will allow for the creation of LUMA's Safety Management Plan.	41-50%	<ul style="list-style-type: none"> - Finalized all job descriptions and submitted to HR for translation. - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Program Briefs for all Health, Safety and Quality programs/projects for inclusion in the Initial Budgets/SRP submission. - Advanced LUMA training matrix based on initial budgets and program delivery models. - Completed the initial learning management system (LMS) requirements for key training for commencement. - Completed a full analysis of PREPA's historical incident data to support future HS campaigns and to determine areas for strategic focus. - Significant efforts on administering and responding to the COVID 19 protocol requirements including internal communications.
2.0308	Engineering and Asset Management	This item includes delivering an Engineering Plan that includes standards for the distribution system, protection & controls, as well as transmission system and substation engineering standards, and generation and renewables interconnection standards.	31-40%	<ul style="list-style-type: none"> - Continued the development of the Design Standards for Protection/Control/Automation, Substations, Transmission Lines. - Continued to support and advance estimates for the Initial Budgets/SRP as required. - Continued to participate in the Design Documents PREPA-Sargent & Lundy Steering Committee. - Continued to provide guidance on the PREPA 2021FY projects Cataño. (38/13.8 kV) Substation Pilot Project and the San Juan 115 kV GIS Substation project. - Continue the review of the existing Interconnection Processes.
2.0309	Identification of Real Estate	This deliverable includes evaluating the current portfolio management and facility management processes including a health assessment of all facilities; creating a PREPA property summary sheet for each property and selection of facilities LUMA intends to use; reviewing the real estate portfolio; reviewing vendor and maintenance services for properties; creating space delineation and property disposition plans; and performing other real estate activities as required..	81-90%	<ul style="list-style-type: none"> - Continued engagement with PREPA real estate staff regarding ongoing real estate transactions, real estate portfolio optimization and to gain an understanding of damaged facilities eligible for FEMA funding. - Continued the evaluation for the selection of critical use facilities identified by PREPA and LUMA stakeholders. - Continued review of PREPA's approach for facilities management and management of the real estate portfolio in order to facilitate the development of future process improvements. <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist items 10.02).</p>

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2.031	Materials Management & Warehouse Plan	This deliverable identifies gaps within Materials Management & Warehousing resourcing, facilities, equipment, functions, processes and procedures, and develop a prioritized plan for closing identified gaps.	31-40%	<ul style="list-style-type: none"> - Progressed the draft of the Materials Management & Warehouse Plan. - Began interviews for the Management and Supervisor layers of Materials Management. - Defined scope of Generation services with GenCo team. - Developed list of required Supply Agreements for Commencement. - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from and O&M and capital perspective. - Advanced the drafts of the Material Management Program Briefs for inclusion in the Initial Budgets/SRP submission.
2.0311	System Operations Plan	This deliverable consists of developing a plan to ensure LUMA is positioned to operate the T&D system upon Commencement. This will include the review of equipment to ensure safe operations and assess the resources responsible.	21-30%	<ul style="list-style-type: none"> - Began draft of Standard Operating Procedure. - Reviewed and mapped-out outage dispatch process and planned work process. - Conducted review sessions with LUMA Facilities department to review existing building resources and prepare initial suggestions for LUMA Operations needs. - Worked collaboratively within the Operations' leadership team to draft the Year-1 Operational Priorities. - Conducted preliminary work on development of the Restoration Annex of the ERP. - Developing initial draft of the 'scope' for post commencement supply and services contracts. - Submitted RFIs to assess the availability of work tools and test equipment within the PREPA organization.
2.0312	Vegetation Management Plan	This deliverable assesses the existing vegetation management practices to identify needs and develop prioritized plans within the areas of: vegetation condition on critical sites and assets, widening or reclaiming existing rights-of-way, planning for steady-state vegetation maintenance, vegetation management support for capital expenditure projects, and contracting for specialized integrated vegetation management services.	41-50%	<ul style="list-style-type: none"> - Developed first drafts of Technical Specifications of Distribution ROW Reclamation and Preventive Vegetation Maintenance, general specifications for all VM work types, and individual IVM methods including herbicide applications. - Developed high level strategy (PPT, Word outline) for outsourcing specialized vegetation maintenances services. - Developed outline and began generating narrative text for Vegetation Management Plan. - Furthered the recruitment effort for key VM positions. - Continued working through the Vegetation Maintenance work prioritization and estimate based on findings from workload assessment/survey in support of LUMA's Initial Budgets and SRP, both from and O&M and capital perspective. - Advanced the draft of the Vegetation Management Program Brief for inclusion in the Initial Budgets/SRP submission.
2.04	Update Emergency Operations Manual and Business	This deliverable is the same as Handover Checklist item 2.0303	Refer to 2.0303	<ul style="list-style-type: none"> - Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.0303 and 9.02.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
	Continuity/Disaster Recovery Plan			
2.05	Environmental Exposure Management Plan	This deliverable involves the development and compilation of Environmental Policies, Processes, and Procedures Assessments, Environmental Permit Compliance Review, and Waste Contractor Review to enable for the creation of LUMA's Environmental Exposure Management Plan.	51-60%	<ul style="list-style-type: none"> - Developed draft environmental policies for commencement (e.g. Waste Management, Vegetation Management, Emissions Management, Working Near Waterbodies, and Agency Inspections). - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Program Briefs for all Environmental programs/projects for inclusion in the Initial Budgets/SRP submission. - Developed requirements list and investigated available software systems to support HSE&Q incident data collection and reporting at commencement. - Finalized systems to store, process and review environmental data from Baseline Environmental Study. - Work began on the PREPA-led Baseline Environmental Study. LUMA is working with PREPA and the service provider to expedite work given proposed timeline.
3	System Remediation Plan Milestones			
3.01	Remediation Plan Proposal	This deliverable consists of developing a remediation plan outline and methodology.	100%	<ul style="list-style-type: none"> - The SRP outline and methodology has been completed and reviewed with key agencies and the System Remediation Planning team (formed as per the 4.1 (d) (ii)). - No Activity to report.
3.02	Development of Improvement Initiatives	This deliverable includes the development of Improvement Initiatives with remediation plans that includes performance metric targets and order of magnitude cost estimate, improvement initiative plans, and improvement initiative risk assessments.	91-99%	<ul style="list-style-type: none"> - This effort captured the identification of initiatives by LUMA teams which is now largely completed. The effort has been the continued iterative process of prioritization and sequencing for inclusion into the Initial Budgets/SRP. <p>Note: refer to 1.02 & 3.04 which capture the evolution from gap assessments (1.02), to initiative development (3.02); and to System Remediation Plan development (3.04)</p>
3.03	Consolidate Plans from All Areas	This deliverable includes the development of a consolidation plan including a multi-year utility capital expenditure plan for each function department.	91-99%	<ul style="list-style-type: none"> - Further to efforts noted in 3.02, continued to advance the consolidation of initiatives across LUMA. This work is nearly complete and involved the continued consolidation of Programs and Projects into a single template for classifying, prioritizing and sequencing. The template was developed for the LUMA teams to utilize to capture critical information including the justification for programs/projects for regulatory filing purposes.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
3.04	Development of System Remediation Plan	This deliverable includes the development the System Remediation Plan comprising of the consolidated of a T&D current state gap analysis & improvement initiatives	81-90%	<ul style="list-style-type: none"> - Further to efforts noted in 3.03, a significant effort focused on coordinating work with all departments to ensure consistency in input of program/projects for the Initial Budgets/SRP. - Continued work to ensure classification of programs/projects as SRP and for inclusion in the Initial Budgets as well as whether FEMA eligible programs/projects. - Continued iterative work of prioritization of programs/projects with consideration of fiscal constraints and operational priorities. - Continued work on development of the SRP report to be submitted to P3. <p>Note: refer to 1.02 & 3.02 which capture the evolution from gap assessments (1.02), to initiative development (3.02); and to System Remediation Plan development (3.04)</p>
3.05	Approval of System Remediation Plan	Activities to gain P3A and regulatory (PREB) approvals for System Remediation Plan	40-51%	<ul style="list-style-type: none"> - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from and O&M and capital perspective. - Led workshops and then reviewed and edited program briefs for consistency with Initial Budgets/SRP framework and definitions for progress towards a remediated state for specific activities and assets. - Advanced the drafts of the Program Briefs for Utility Transformation's programs/projects for inclusion in the Initial Budgets/SRP submission. - Supported operating groups to complete risk assessment of processes, procedures and assets. - Reviewed content for application of Capability Business Model to our gap assessment of existing utility processes and procedures. - Reviewed content for application of health assessment for existing utility assets. - Worked on the draft of the SRP in preparation for regulatory filing.
4	Customer Services			
4.01	Evaluating Customer Service Facilities and Assets	This deliverable consists of evaluating customer service facilities and assets through establishing joint teams between PREPA and LUMA liaisons to review all current locations and their functions. Activities include evaluating facilities and identifying locations that meet business requirements; developing a transition plan to operate customer facilities and identify requirements for additional facilities and/or consolidate existing facilities.	71-80%	<ul style="list-style-type: none"> - Evaluated identified San Juan area building and determined suitability as primary contact center, with additional availability for Customer Experience teams. - Completed tour of current PREPA training facilities. - Monthly collaboration meetings between Facilities and Customer Experience team to confirm potential locations for new centralized Billing Services / Revenue Protection teams. - Monthly Customer Experience, Operations and Facilities meetings to identify potential locations for consolidation and/or lease saving opportunities.

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4.02	Evaluating and Updating Customer Service Policies and Procedures	This deliverable involves a review and evaluation of PREPA customer service policies, processes, and procedures to confirm they meet regulatory compliance to Laws, Acts and Policy. Activities include a review of policies against ServeCo. policies, processes, procedures; developing updated policy and procedure documentation in coordination with transition operating requirements including quality control measures; and developing Customer Service training program to instruct policies and procedures and maintain a high level of service.	31-40%	<ul style="list-style-type: none"> - Created a centralized Customer Experience process inventory and document status tracker that outlines the priorities, process maps, procedure documents, and policy documents that are required. - Level of Effort/Scope of Work was completed to determine the number of hours required to review and update all Policy, Process, Procedures. - Completed initial version of the top Contact Center Process Maps. - Completed and recorded 3-Day Contact Center Training of current state processes with PREPA Trainer. - Created a LUMA Customer Experience Policy/Procedure standard template for LUMA Customer Experience. - Policies, processes and customer letters received during November have been translated.
4.03	Development of a Meter Reading Plan	This deliverable includes developing a Meter Reading Plan that includes assessments of automated meter data collection and management process, meter read quality controls, processes for meter shop and field meter data collection, and an evaluation of meter data and meter asset management automated systems.	61-70%	<ul style="list-style-type: none"> - Worked through the metering related work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Program Briefs for metering for inclusion in the Initial Budgets/SRP submission. - Continue to analyze PREPA meter data in an attempt to determine meter age to use in initial planning. - Completed geocoding of approximately 370K meters with no lat.long location to assist in deployment planning. - Issued RFIs and awaiting responses on these and older RFIs for additional data for use in planning. - Began work on immediate post-commencement activities, plans and schedule. - Worked with HR to advance the hiring for the Metering Director.
4.04	Development of a Customer Service Transition Plan	This deliverable consists of undertaking a gap analysis of current state Customer Service organization, roles, responsibilities and operations; establishing the future state organization including ensuring alignment with the field execution teams; and developing and implementing (where appropriate) a transition plan including People, Facilities, Equipment, Training and Technology to ensure smooth transition into commencement.	31-40%	<ul style="list-style-type: none"> - Completed 75% of testing for JD Powers PREPA customer surveys (Residential and Commercial) to ensure correct data flow to customers email addresses. - Completed transition plan table of contents and template document. - Completed cross-department review of transition plan templates to gain alignment across LUMA. - Completed initial data gathering for the first draft of the Customer Experience transition plan template. - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Program Briefs for all Customer Experience programs/projects for inclusion in the Initial

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
				Budgets/SRP submission. - Finalized job descriptions for all Customer Experience positions.
4.05	Development and Implementation of a Service Start and Shut-Off Plan	This deliverable involves a review of field credit and collection functions and front-line account set up to assess processes and associated timelines, and evaluating performance based on benchmarks, regulations, and targets as well as the technology, applications, and external vendors involved in the process; developing a Credit and Collections contact center and Dunning Policy including process, call out, timelines and standard communications; and create a training plan and ongoing performance goals for employees that ensures efficiency and accuracy within the Service Start and Shut-off Plan.	21-30%	<ul style="list-style-type: none"> - Initiated design of future state dunning and collections processes. - Documented the 'initiate service' and 'disconnect service' process maps. - Conducted additional start shut off plan discovery and initiated process documentation for other key start shut off plan processes including cut list generation (for non-pay), payment arrangement, name game and protect the front door (revenue protection).
4.06	Development of a Meter Asset Management (MAM) Plan	This deliverable includes developing a Meter Asset Management Plan that includes the assessment of the meter shop facility, and meter asset management quality controls, as well as develop a meter asset management remediation plan, and meter asset tracking and sampling procedures.	51-60%	<ul style="list-style-type: none"> - In conjunction with work on HOC 4.03, explored options for the meter asset management system based on work prioritization to be included in the Initial Budgets/SRP submission.
4.07	Development and Implementation of a Customer Service Technology	This deliverable involves assessing the integrations of all Customer Service and T&D Ops technology. Activities include developing a project plan to execute Oracle CC&B transition from PREPA to LUMA; developing a modernization plan to include cloud-based contact center technology; assessing bill presentment technology to produce redesigned LUMA bill; assessing current contract for regional office customer queuing/appointment technology; and developing training and instructional materials to ensure the efficient usage of the technology to achieve targeted performance goals.	31-40%	<ul style="list-style-type: none"> - Reached agreement on a 30-day trial of the new Cloud Based Contact Center Platform. - Completed development of the Contact Center Platform Implementation Statement of Work. - Completed IT/OT "Launch" phase for Contact Center Platform implementation. - Met with potential Contact Center Platform partner to discuss managed services agreement. - Began discussions with network and security teams about infrastructure requirements. - Bill Print and Delivery RFP proposals received in late November and are currently under evaluation. - Significant effort with PREPA and LUMA Operations investigating current state and working on future state service order dispatch in an effort to solution an automated process rather than the current manual process. - Functional leads met with IT/OT to review all current software developed by PREPA to determine utilization post commencement. The evaluation is on-going. - Finalized 'Day 1' functional requirements, specifications, and integrations for LUMA Mi Cuenta (customer self-serve portal). - Initiated work on the LUMA customer App.

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4.08	Develop and Implement a Non-Technical Energy Loss Reduction Plan	This deliverable includes developing a Non-Technical Loss (NTL) Plan comprising of a high level NTL recovery strategy, NTL system architecture, and detailed NTL recovery plan.	11-20%	- Held internal discussion regarding the process and labor resources required to implement loss reduction plan.
4.09	Establish Integration Between Customer Services & T&D Ops	This deliverable includes identifying integrated and dependent work processes between Customer Service and T&D Operations and move work processes, where appropriate, to Operations. Develop, document and train to new work processes; develop standard communication, meetings and timelines for regular feedback between teams; and assess the training needs and develop instructional materials to ensure alignment with processes between the two organizations to achieve targeted performance goals.	31-40%	<ul style="list-style-type: none"> - Met several times with PREPA Commercial Office Director to fully comprehend current state dispatch process. - Meetings with LUMA Operations teams to: (i) develop the new process for dispatching Service Orders and documenting completion in Oracle CC&B after commencement; (ii) advance integrated processes and transition plan of respective departmental teams for field execution of Service Orders; and (iii) identify service targets for each work activity. As part of this work LUMA identified 40 integrated and dependent work processes between the teams to date; this work is on-going. - Meeting with IT/OT to review automation options and cost implications. - Analyzed the New Connection process for future state LUMA responsibility for projects >50kVa, <50kVa and subdivisions. - LUMA and PREPA Customer Service Supervisors met to discuss number one customer complaint regarding estimation of customers' bills and meters not being read.
5	IT			
5.01	Development of IT/OT Communication Plan and Acceptance Criteria	This deliverable includes the identification of Key Stakeholders, Setting up governance and resourcing for communications team.	91-99%	<ul style="list-style-type: none"> - Held meeting to determine approach and resources. - Draft plan and strategy developed, and began HOC deliverable documentation. - Majority of these activities were completed in conjunction with other HOC items where time was incurred. - Communication plan work completed for FET period and now moving to communication planning for Service Commencement (5.08)
5.02	Identification and Gap Analysis	This deliverable includes the identification of gaps between the organization's current state and expected end state; and the development of plans to remediate or close the identified gaps.	81-90%	<ul style="list-style-type: none"> - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Advanced the drafts of the Program Briefs for all IT/OT programs/projects for inclusion in the Initial Budgets/SRP submission.
5.03	Evaluating IT/OT Applications and Infrastructure	This deliverable includes gathering information and evaluating PREPA's IT/OT applications and infrastructure.	100%	- No activity to report.
5.04	Development of Cyber Security and Business Continuity Plan	This deliverable includes the development of a Cyber Security and Business Continuity Plans; and establishing a Cybersecurity Information Security Office (ISO)	81-90%	<ul style="list-style-type: none"> - Continued building elements of the Cybersecurity Plan. Finalizing draft Cybersecurity Plan package for internal approval. - Completed project roadmap and buildouts for the Cybersecurity roadmap. - Created a framework in support of our Business Continuity Plan (BCP).

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				(Work on this deliverable is conducted in conjunction with the Handover Checklist items 9.05).
5.05	Development of an IT Asset Management Program	This deliverable includes creating inventory of PREPA's Physical and Logical assets; and developing a process for ongoing management of assets.	0-10%	- Began initial definition of asset management principles and scope.
5.06	Development of an IT/OT Transition Plan and Schedule	This deliverable includes the identification of a Stand-up transition team and develop the Front End Transition Mobilization plan.	100%	- Workstream and HOC deliverable documentation complete.
5.07	Commencement Cutover Planning	This deliverable includes activities to prepare for Commencement Cutover during Transition.	11-20%	- Continued review of PREPA contracts. - Started definition of the strategy for commencement cutover. - Developed initial list cutover activities.
5.08	Training and Communication Plan	This deliverable includes activities to plan and communicate IT/OT Training opportunities to current and future LUMA employees.	0-10%	- No activity to report.
6	Financial Management			
6.01	Detailed Description of Approach to Budgeting and Reporting	This deliverable involves a review of current budgeting and forecasting processes; identify PREPA's business activities, including prior year actual and original budget, and ensure they are contemplated in the information shared for the draft initial budget; and ensure the anticipated spend from the various LUMA plans prepared during the transition period are included into the initial budgets.	41-50%	- Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Worked with all LUMA departments to ensure O&M budget iterations fit within the revenue requirement and budgets reflect all information known at the time as we continue to iterate towards the submission of the Initial Budgets and SRP. (Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.02 and 6.05) and time allocated accordingly).
6.02	Description of Approach to Complying with Initial Budget Obligations	As part of the budgeting process, LUMA will develop a template, based on current templates used by PREPA, to be provided to each department to implement their budgets (breakdown/prior year actuals and existing budget), including guidance on the bottom-up approach based on key operational expenses (KOE).	81-90%	- Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Worked with all LUMA departments to ensure O&M budget iterations fit within the revenue requirement and budgets reflect all information known at the time as we continue to iterate towards the submission of the Initial Budgets and SRP. (Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.01 and 6.05 and time allocated accordingly).
6.03	Formalizing/Approach	This deliverable includes the reporting any significant deficiency, material weakness, improvement opportunities and	91-99%	- Completed the list of deficiencies and opportunities identified as result of our understanding of PREPA's Internal Controls

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	to Changes Control Processes	any other matter considered relevant for the FET identified as a result of the review of PREPA's Internal Controls Framework.		Framework. Deficiencies were incorporated in LUMA's Initial Budgets/SRP work.
6.04	Establishing a Financial Accounting System and Account Structure	This deliverable establishes a financial accounting system and account structure. Activities include a review of PREPA's current Chart of Accounts for alignment with FERC requirements, and determine what changes, if any, are required; review PREPA's current financial and work management systems, and determine if any additional packages should be considered; determine the organizational structure required for LUMA ServeCo; design, configure and test LUMA ServeCo's financial systems; gain approval of LUMA ServeCo's Chart of Accounts; and design and implement processes for finance actuals and reporting.	41-50%	<ul style="list-style-type: none"> - Completed initial configuration of Oracle EBS. - Identified methodology and associated processes for Labor Cost Distribution. - Prepared for Oracle EBS Project Accounting and Fixed Asset Conference Room Pilot sessions to be held in conjunction with PREPA.
6.05	Preparing Initial Budgets and Other Financial Forecasts	This deliverable consists of preparing initial budgets and financial forecasts. Finance will discuss any potential changes on assumptions and priorities, agree to the overall approved budget and consolidate all departmental budgets to be reviewed and included in a Master Budget Template. From the Master template, actuals and forecast/revisions will be updated on a monthly basis in order to compare Monthly, YTD and FYF balances.	81-90%	<ul style="list-style-type: none"> - Continued working through the work prioritization in support of LUMA's Initial Budgets and SRP, both from an O&M and capital perspective. - Worked with all LUMA departments to ensure O&M budget iterations fit within the revenue requirement and budgets reflect all information known at the time as we continue to iterate towards the submission of the Initial Budgets and SRP. <p>(Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.01 and 6.02 and time allocated accordingly).</p>
6.06	Establishing Bank Accounts	This deliverable includes establishing all necessary bank accounts for LUMA ServeCo and work with PREPA to set up the service bank accounts required for Commencement, as described in the OMA agreement.	0-10%	- No reportable activity in November.
6.07	Evaluating and Updating Payroll and Labor Cost Reporting systems	This deliverable involves Workday stand-up including activities associated with processes and interfaces involving Kronos, EBS and ADP including evaluating labor cost reporting.	11-20%	<p><u>Workday Payroll:</u></p> <ul style="list-style-type: none"> - Progresses the requirements gathering and design. - Completed design on 6 direct (Point to Point) Workday integrations, with ADP, Fidelity and CHUBB. - Confirmed and are in process of developing/documenting our Solution approach for 5 integrations between Workday, EBS and Kronos. <p><u>Kronos:</u></p> <ul style="list-style-type: none"> - Defined and Communicated our project plan & RACI during our project Kickoff meeting. - Completed solution design workshops in preparation of the project Build Phase. - Defined and documented required RICE objects (i.e. Reports, Integration, Conversions and Enhancements).
6.08	Establishing a Delegation of	This deliverable establishes a Delegation of Authority Matrix and Process for LUMA ServeCo. Delegation of Authority to set	61-70%	- Held a meeting to discuss work to be done to complete this item as it relates to comparison of PREPA requisition and PO approvals,

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
	Authority Matrix and Process	Requisition (financial approval) and Purchase Order approval limits in the ERP System.		as well as PREPA's existing purchase order volumes to support the post Commencement limits of authority.
6.09	Processes & Procedures and Overall Internal Controls	This deliverable includes activities related to the understanding and assessment of PREPA's Internal Control Framework, including Entity Level Controls, management directives pertaining to the entire entity are carried out, and Transaction Level Controls (i.e. walkthroughs on key business processes).	91-99%	- Completed all walkthroughs on key business processes and documented for internal review & finalization.
7	FEMA Funds and Federal Funding Procurement Manual			
7.01	Set Up Governance Framework	This deliverable includes the assessment and identification of gaps in the PREPA grant governance structure. Design a governance framework consistent with the Disaster Recovery Federal Funding Management Guide.	21-30%	- No activity to report.
7.02	Policies and Procedures	This deliverable includes the development of policies and procedures in line with governance framework.	31-40%	- Began drafting of Governance Framework Policies and Procedures focused on addressing identified gaps and risks noted in our assessment of existing policies and procedures.
7.03	Staffing Plan	This deliverable includes developing the staffing plan for federal funding group consistent with DRFFMG.	91-99%	- No activity to report.
7.04	Surge Staffing	This deliverable includes establishing options for surge staffing to be implemented as part of emergency response and recovery.	Refer to 9.02	- Work associated with 7.04 is included in HOC 9.02
7.05	Project Worksheet Assessment (also covered under Section 4.3)	This deliverable includes the assessment of the current progress of project level details and the status of FEMA Project Worksheets (PW) and all of PREPA's federal funding activities, including all federal grants and other monies for disaster recovery.	61-70%	<ul style="list-style-type: none"> - Continued development of GIS interactive map of FEMA PA permanent restoration and 404 mitigation project information, matched to PREPA assets. Information includes supporting documentation submitted to FEMA to justify the grant award amount for public assistance. - Supported the development of the Initial Budgets and SRP with FEMA Public Assistance-related technical input and documentation. - Continued PW Assessment execution activities including gathering underlying support from grants portal for selected PWs. Progress slowed this month due to delay in RFIs responses. - Attended meetings to observe and understand high level progress of PREPA's 10 year infrastructure plan to be submitted to FEMA.
7.06	Handoff of Project Worksheet Activity from COR3 and Vendors	This deliverable involves the transition of federal funding activities from PREPA and consultants to LUMA team, including cooperation with COR3 and all relevant agencies.	Refer to 7.05	- Work associated with 7.06 is included in HOC 7.05
7.07	Project Procurement Planning	Assess and identify gaps in the PREPA procurement process for federally funded activities.	Refer to 7.05	- Work associated with 7.06 is included in HOC 7.05

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
7.08	Drafting, Revising and Finalizing Federal Funding Procurement Manual	This deliverable involves completing Federally Funded Procurement Manual consistent with DRFFMG and as specified in OMA 4.1 e.	51-60%	- Continued drafting the LUMA federal fund procurement policy and procedure including aligning policies with Non-Federally Funded Procurement Manual in progress.
8	Staffing for Front-End Transition Period			
8.01	Draft, Revise and Finalize Operator Employment Requirements	This deliverable consists of determining the minimum employment requirements for LUMA employees by position.	100%	- The effort for this activity is captured under item 8.02 Recruitment and Staffing. This specific deliverable has been completed.
8.02	Recruiting and Staffing	This deliverable involves recruitment and staffing. Activities include the HR transition team coordinating with each department and completing interviews of all PREPA employees and external candidates; tracking of applicants; assisting with PREPA employee applications, coordinating interviews, and communicating status of applications; and Identifying staffing vacancies due to gaps and search for resources externally to fill out the proposed LUMA Organization including pre-employment screening.	31-40%	<ul style="list-style-type: none"> - Recruiters working with Hiring Managers to post jobs and determine hiring strategies. - Posted approximately 417 positions. Approximately 1,650 applications moved past first round interviews. - Continued 'Connects' software implementation for increased job application resources for PREPA employees. - HR Team and recruiters engaged with PREPA employees to guide them through hiring process and general questions including face-to-face meetings held with PREPA employees. - Developed and distributed recruitment flyers and application support communications to help encourage new PREPA applicants.
8.03	Redesign and Staff New Organization	The core HR transition team will coordinate with each department to develop a comprehensive department specific People Strategy/Staffing plan that compliments overall business strategy. It will include getting a finalized number of roles needed in each department, finalizing job descriptions, selecting and implementing pre-hiring recruitment, assessment and evaluation criteria tools, as well as standing up these tools.	81-90%	<ul style="list-style-type: none"> - Advanced the review of LUMA's Organizational Structure with Senior Leadership; refinements are ongoing. - Continued to refine, translate into Spanish, and load into iCIMS recruiting software. - Continued working with departments on budgets as it relates to employee salaries and benefits. - Continued working to create terms and conditions for each employee job profile.
8.04	Proposed Recruitment and Staffing Plan	This deliverable consists of the core HR transition team coordinating with each department to develop a comprehensive department specific People Strategy/Staffing plan that compliments overall business strategy. This includes a list of positions needed by department, finalizing job descriptions, selecting and implementing pre-hiring recruitment, assessment and evaluation criteria tools, as well as standing up these tools.	Refer to 8.02	- Reporting has been consolidated under 8.02 Recruiting and Staffing

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in November
8.05	Stand Up Human Capital Management (HCM) System	This deliverable consists of the Integration of a Human Capital Management (HCM) system will significantly impact business operations by Improving HR Processes, Employee Engagement, Reporting and Security.	51-60%	<ul style="list-style-type: none"> - Completed Phase 1a Unit Testing (HCM/Benefits/LMS). - Prepared Phase 1a test scenarios to be used during End-to-End (E2E) testing and developed a Phase 1a E2E test plan. - Built workbooks with test worker data and test benefits elections. Loaded the LUMA worker data workbook to our E2E tenant for testing. - Held Foundation Alignment Sessions for Payroll and Absence Management (Phase 1b modules) and initiated the initial Absence Management workbook configuration of the Phase 1b tenant. - Participated in discovery and design sessions for EBS and Kronos. - Continued Phase 1a integrations. Completed build and fit & form testing with vendors in preparation for E2E deep testing of files. - Commenced Phase 1b integrations. Conducted design sessions for Workday to begin development
8.06	Communication Plan	This deliverable consists of establishing and implementing internal and external communications plans. On the internal side, the focus will be on continuously informing PREPA and LUMA employees through multiple avenues (e.g., one-on-one meetings, group sessions, town halls, newsletters, intranet updates, etc.) to answer employee questions and keep them updated on progress. On the external side, LUMA will strategically use media coverage, social media and advertising including digital, billboards, print and radio to introduce LUMA to the people of Puerto Rico.	41-51%	<ul style="list-style-type: none"> - Continued LUMA's on-going communication of our key messages through external channels (social media) and advertising (i.e. digital mediums, billboards, print and radio). - Further developed LUMA website to include a comprehensive customer account portal to go live prior to commencement. - Created a monthly newsletter and job application support flyer to keep PREPA employees engaged in LUMA's recruiting efforts and invested in the company culture. - Planned and executed strategic appearances of the LUMA CEO at media events. - Formed the LUMA Brand Committee to help plan and execute the LUMA re-branding effort across the island.
8.07	Training (Workforce Development) Plan	This deliverable involves creating a training development program for employees which involves establishing LUMA training policies, standards, practices, curriculum and facilities; onboarding and providing foundational awareness and training to all new and existing employees; and developing a defined career path with continuity of quality education and training.	31-40%	<ul style="list-style-type: none"> - Continued coordination with LUMA department subject matter experts regarding their learning and training requirements to understand their expectations at Commencement for using Workday. <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist item 2.0306)</p>
8.08	Develop Employee Retirement Plan	This deliverable consists of the core HR Transition team, working collaboratively with the current HR key personnel at PREPA, to develop a comprehensive Total Rewards strategy. This includes the development of action plans and programs regarding the LUMA's new proposed Retirement Plan, Health & Welfare Benefits Plan, and Compensation approach.	81-90%	<ul style="list-style-type: none"> - Approved vendor for Voluntary Plans. - Approved the Resolution for 401K Plan and Oversight Committee. Assigned Benefits Committee. - Defined and implemented the health plan funding process with Cigna. - Continued work on communication materials for Total Rewards for Onboarding of new employees. - Finalized Employee communication for 401K plan enrollment.
8.09	Occupational Health and Wellness	This deliverable involves implementing a confidential Employee Assistance Program through our medical provider.	61-70%	<ul style="list-style-type: none"> - Developed roadmap for Occupation side of health clinic including nurses, locations/access and costs.

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				- Continuation of research into outsourcing options for occupational services.
8.10	Compliance Plan	This deliverable consists of the Core HR transition team to review and evaluate current employee policies, procedures and any applicable handbooks.	41-50%	- Continued compliance review of new job descriptions for new Organization. - Continued development and review of core LUMA Policies.
8.11	Engagement Plan	Implement an overall Employee Engagement Plan so employees can adjust to the new leadership and direction. We will define the company's culture, mission and core values, and ensure that employees understand they will have opportunities at LUMA. We will provide opportunities for employee engagement with employee events such as family picnics and volunteer opportunities in the community.	21-30%	- Continued development of Employee communication materials for current and future LUMA hires. - Continued refinement of LUMA Employee messaging based on feedback from PREPA employees.
8.12	Develop a Community Investment Plan	This deliverable consists of the development of a multi-year community investment program enabling LUMA to be a valued part of the Puerto Rican community. This activity includes LUMA partnering with select programs and organizations to contribute to the community in Puerto Rico and will involve engaging employees in the program(s) through donations and volunteer opportunities.	41-50%	- Met with a variety of organizations across the island to explore community investment partnerships. - Continued the development of a comprehensive community investment plan.
9	Additional Front-End Transition Period Activities			
9.01	Genco Shared Services Agreement Approval	This deliverable consists developing a plan for delivery of shared services as well as negotiating and executing a Shared Services Agreement.	71-80%	- Progressed the draft of the SSA with all LUMA managers in preparation for review with the Generation Directorate and others. - Continued to progressed work in support of Departments that will provide shared services by confirming services and historical costs.
9.02	Emergency Response Plan Approval	This deliverable consists of obtaining internal approval of the Emergency Response Plan (ERP) prior to providing the plan to Administrator and PREB.	Refer to 2.0303	- Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.0303 and 2.04.
9.03	Non-Federal Funding Procurement Manual Approval	This deliverable assesses existing reference materials from PREPA and additional requirements from LUMA to create the Non-Federal Funding Procurement Manual and submit to PREPA/P3 for review/approval.	51-60%	- First draft of the Non-Federal Funding Procurement Manual has been submitted for internal stakeholder review and feedback. The manual is substantially complete, however the Contract Management section (templates, etc.) is still under development with Legal.
9.04	Physical Security Plan Approval	This deliverable consists of developing a Physical Security Plan that includes a list of assets that require physical security, a substation security assessment for each substation, a security gap assessment with an outline of remediation initiatives and solutions, and a comprehensive physical security plan.	71-80%	- Continued efforts focused on defining Physical Security programs scopes and budgets for the SRP/Initial budgets including identifying projects potentially being funded through FEMA. - Continued Identifying and documenting major deficiencies through RFIs, interviews and site observations. - Continued the consolidation and organization of the information collected to be utilized in physical security plan. - Began work on defining minimum standards based on findings.

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9.05	Data Security Plan Approval	This deliverable consists of developing a Data Security Plan to ensure confidentiality and integrity of organizational data and obtaining the necessary approval prior to Commencement.	81-90%	- Finalized draft version for internal approval. - Engagement with security services to improve operational metrics and contributors to the Data Security Plan. (Work on this deliverable is conducted in conjunction with the Handover Checklist items 5.04)
9.06	Vegetation Management Plan Approval	This deliverable includes the approval of the Vegetation Management Plan through the appropriate LUMA and PREB review and approval requirements.	Refer to 2.0312	- Reporting has been consolidated under VM plan 2.0312
9.07	System Operation Principles Regulatory Approval	This deliverable consists of activities to gain P3A and regulatory (PREB) approvals for System Operation Principles	41-50%	- Supported draft of the System Operations Principle document and reviewed and commented for regulatory content.
10	Asset Acquisition (Supply Chain)			
10.01	Evaluating Existing Procurement and Subcontracting Policies, Procedures and Systems	This deliverable includes evaluating existing procurement and subcontracting policies, procedures and systems; identify system contracts and generation supply contracts; review vendor services to facilities; sourcing and procurement work for LUMA ManageCo contracts.	51-60%	- Draft processes & procedures were submitted for internal LUMA review, currently reviewing with internal stakeholder groups.
10.02	Assuming Responsibility for Securing Use of Assets, Facilities, IT / OT, etc.	This deliverable involves performing facility assessments on PREPA's leased and owned properties and determine continued use and occupancy of current facilities. Activities include reviewing occupancy information, reviewing the assets collected, determination of asset management system moving forward, performing asset studies, and the development of processes and procedures related to asset management moving into commencement.	31-40%	Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.0309 - Continued engagement with PREPA real estate staff regarding ongoing real estate transactions, real estate portfolio optimization and to gain an understanding of damaged facilities eligible for FEMA funding. - Reviewed of health assessments and asset info to assist in determination of facility selection and needs in order to facilitate occupancy.
10.03	Assuming Existing Subcontracts	This deliverable includes compiling a listing of all existing subcontracts, including executed copies of subcontract, and complete a gap analysis (expired, missing etc.) of subcontracts being assumed against the immediate needs of O&M of the T&D System, and develop processes and procedures for assuming the existing subcontracts.	31-40%	- Have obtained and are in the process of reconciling multiple partial lists of contracts. - Have begun to collect copies of said contracts in a central repository and assign them to LUMA departments.
11	Back-End Transition Plan			
11.01	Develop Back-End Transition Plan	This deliverable includes developing a plan that will guide the process for LUMA transferring operations back to PREPA at the end of the contract term. This includes the development of departmental scopes, timelines and documentation to provide T&D System status and plans to support operational and commercial transfer. (Refer also to Handover Checklist item 12.04)	Refer to 12.04	- Reporting has been consolidate under 12.04 Back End Transition Plan

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12	Front-End Transition Plan (Additional Requirements)			
12.01	Confirmation of Acceptable Operator Security	This deliverable ensures confirmation of the requirement to confirm Operator Security prior to Commencement.	0-10%	- This will occur just prior to commencement.
12.02	Required Insurance	This deliverable ensures placement of insurance program and business process reviews as required in the O&M agreement for ServeCo, including claims reviews; prepare insurance package for LUMA Energy and deliver certificates, as required, i.e. workers' compensation (local content if applicable), employers' liability, fiduciary liability, and professional liability, according to the deliverable schedule.	0-10%	- Further discussion with PREPA Risk to map-out policies where documentation is needed and requested meetings with some of the Underwriters to discuss in person.
12.03	Baseline Performance Levels	This deliverable involves the development of a methodology for accessing the quality of existing measurement data, a gap analysis of the assessment results against industry best practices with a plan to fill the identified gaps, as well as a plan for an interim performance metrics process to utilize at commencement, and a proposed annual target metric and improvement trajectory.	91-99%	<ul style="list-style-type: none"> - Continued LUMA wide work to develop Performance Metrics baselines and target including replacement metrics where warranted. Work also included further developing the approach to the Major Outage Event Performance Metrics - Discussed draft performance metrics with relevant teams and reviewed proposed baselines, thresholds and targets. - Prepared for and undertook Performance Metric Planning sessions. - Reviewed proposed filing structure and content with responsible teams for compliance with OMA and regulations. - Continued development of Performance Metrics document for regulatory filing.
12.04	Back-End Transition Plan	This deliverable captures the internal review and approval of the Back End Transition Plan subsequent to the completion of Handover Checklist item 11.01 prior to submission to the Administrator for its information and approval.	81-90%	<ul style="list-style-type: none"> - Gathered and Incorporated comments from each department for their respective sections of the BET plan. - Commercial and legal review completed. - Final draft has been developed and forwarded to senior management for review and approval.
12.05	Representations	Section Heading for Owner and Operator Representations set forth in Sections 12.06 and 12.08 of Handover Checklist	-	- Heading only. No activity required.
12.06	Operator Representations and Warranties	All representations of (i) Operator in Section 19.2 of the OMA, and (ii) Guarantors in the Guarantees will be brought forward and certified as true and correct as of the Service Commencement Date.	0%	- No action required at this time
12.07	Section 4.3: Owner and Administrator Responsibilities	PREPA's and P3A's conditions precedent to Service Commencement	-	- No activity to report. (This is work performed by Administrator and/or Owner).
12.08	Owner Representations and Warranties	All representations of Owner in Section 19.1 of the OMA will be brought forward and certified as true and correct as of the Service Commencement Date. NOTE: Responsibility of Owner and Administrator under Section 4.3 of OMA.	-	- No activity to report. (This is work performed by the Owner).

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12.09	Section 4.4 Governmental Approvals	This deliverable involves legal and regulatory work to (i) identify and transfer, assign or otherwise obtain all Governmental Approvals required to commence operations, and (ii) obtain a Tax Assurance from Puerto Rico Treasury Department	Refer to 1.01	- Reporting has been consolidate to 1.01 Government Approvals
12.10	Section 4.5: Conditions Precedent to Service Commencement Date	Legal work to fulfill and satisfy all conditions precedent to Service Commencement Date outlined in Section 4.5 of the OMA.	31-40%	Continued to provided legal support to numerous condition precedent activities within LUMA including the following: - Worked with the P3A and its advisors (Cleary, PMA, and FTI), and the LUMA Regulatory team on approaches to the PREPA Re-organization required under the OMA and the effect on and key services provided under the GenCo-GridCo PPOA. - Reviewed draft of Shared Services Agreement prepared by P3A's counsel, revise and work on same. - Continued to work on and advance the Petition for Approval of Initial Budgets and Related Terms of Service, including the Liability Waiver. - Worked with Regulatory counsel and LUMA Regulatory team on numerous regulatory filings with PREB and separate docket for generation issues. - Additional review of revised Back-End Transition Plan and discussions and drafted language for transfer of ServeCo employees and handling of associated severance issues.
12.11	Section 4.7: Closing the Front-End Transition Period	Work with counsel for P3A to satisfy and confirm that all conditions precedent to Service Commencement Date and deliver appropriate documentation evidencing same	0%	- No action required at this time.
12.12	Service Commencement Begins	Satisfaction of all Service Commencement Date Conditions under Section 4.5 of the OMA	0%	- No action required at this time.