



NEPR

Received:

Mar 13, 2021

4:40 PM

# Monthly Report

Report #: RPT-P3A-009

For the period ending February 2021

# TABLE OF CONTENTS

## Contents

<b>General Overview</b>	<b>3</b>
<b>PERFORMANCE OF FRONT-END TRANSITION (FET) PERIOD</b>	<b>3</b>
A. FET PERIOD PROGRESS REPORT	3
B. COMMERCIAL REPORT	7
C. RISK AND ISSUE MANAGEMENT REPORT	12
D. FINANCIAL PROGRESS REPORT	16
E. SUBMISSIONS	17
<b>APPENDIX A – HANDOVER CHECKLIST</b>	<b>23</b>

# 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 February 28, 2021. 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

LUMA continues to progress work in all areas and remains focused on a June 1, 2021 commencement date. During the month of February, we submitted key regulatory filings with PREB – a significant Front-End Transition achievement. We also continued our focus on recruitment as well as on preparatory plans to ensure a smooth transition.

As we've noted for several months in these monthly reports, there have been challenges that have impacted the efficiency and effectiveness of the Front-End Transition. LUMA has mitigated these challenges by undertaking significant additional efforts and deploying additional resources. These challenges have shown some improvement in February, and we remain optimistic that all conditions precedent to commencement can be achieved by June 1<sup>st</sup>.

With less than 100 days to commencement, LUMA continues to urge all parties to remain focused on their respective contributions to achieve a positive outcome that will benefit of all Puerto Rico.

The following is a summary of the key achievements for the month of February 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.

##### Key Regulatory Matters

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

- a. Submitted to PREB the following key regulatory documents for approval:
  - Initial Budgets and related Terms of Service;
  - Performance Metrics;
  - System Remediation Plan; and
  - System Operation Principles

- b. LUMA engaged in several PREB technical conferences directly related to the OMA as well as industry matters such as the Distribution Guidelines and PREPA's Performance Metrics.
- c. PREPA Reorganization  
The LUMA team continued to support the PREPA Reorganization work which includes the Governance structure, GridCo-GenCo PPOA, and the Shared Services Agreement.

#### Human Resources

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

- Completed interviews with all remaining PREPA applicants and started interviews with external candidates.
- Preparing offer letters with terms of employment to be issued in March.
- Continued to implore clear and concise communication of Pension information to PREPA employees to help support recruitment.

#### Preparing LUMA for Operations

LUMA continued 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 and an assessment of preparedness for commencement. Some of the key highlights for February are as follows:

- a. Health, Safety, Environment & Quality
  - Continued vigilance on our COVID protocol
  - Completed Public Safety Plan and collaborating with LUMA Communications on Awareness strategies.
  - Completion of the 3<sup>rd</sup> draft of the Emergency Response Plan.
  - Conducted a LUMA leadership Emergency Response Plan technical workshop.
  - Monitoring progress of site assessments required for pre-existing environmental baseline studies being undertaken by PREPA and reviewing initial reports.
- b. Capital Program (incl. FEMA Funded and non-FEMA projects)
  - Ongoing capital infrastructure implementation status meetings with PREPA, PREPA consultants and LUMA team to gain alignment.
  - Worked to fully understand PREPA's current project management structure with its consultants to enable smooth transition of work upon commencement.
- c. Internal & Stakeholder Communications:
  - Kicked off development of customer multimedia communications campaign for LUMA commencement.
  - Continued planning and meetings for brand roll out, including approving artwork for fleet branding.
  - Developing Public Safety awareness and preparing final Communications Plan.
- d. Operational and Customer Experience
  - Conducted skills assessments of PREPA's skilled workforce.

- Circulated drafts of the Vegetation Management Plan and Materials Management & Warehouse Plan for internal reviews.
  - Continued the drafting process of the Standard Operating Procedures for the Operations Department.
  - Completed draft of the Integration plan between Customer Experience and Operations.
  - Submitted redesigned LUMA bill to Regulatory team for PREB approval.
  - Undertook a substantive effort to work through System Contracts to establish key contracts/contractors for Commencement.
  - Conducted planning work for implementation of Cloud-Based Contact Centre platform.
  - Finalized plan for coordination of payment processing between contact center, website and app.
- e. Finance and Accounting
- Conducted final space assessments and began input for expected requirements per region/per department.
  - Incorporated departmental feedback into Non-Federal Funding Manual.
  - Began the Fiduciary Liability application process.
  - Finalized system design for Fixed Assets, Project Accounting and the Customer Labor Cost Distribution application for Oracle.
- f. Information and Operational Technology
- Began buildout on the IT OT Commencement Cutover Program Plan. Engaged Vendors on contracts, support and licence count. Initiated review and alignment on current projects with LUMA and PREPA.
  - Preparation of the IT Business Continuity and Disaster Recovery Plan.
  - Progressed on key application implementations required for Commencement (i.e. Oracle Enterprise Business Suite (EBS), Customer Care & Billing (CC&B), Kronos, Workday Payroll & Human Capital Management (HCM), Cloud Based Contact Center, LUMA Website, LUMA Customer Portal, and the Mobile App.)
- g. Other Regulatory matters (in addition to those noted above)
- Progressed on obtaining Governmental Approvals from the Department of Natural Resources and the Oficina General de Permisos (OGPE)

## 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 March, 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:

- a. Key Regulatory Matters
- Respond to PREB requirements with respect to LUMA submitted key regulatory documents as required and continued involvement in industry related PREB dockets.

- Work with P3A and PREPA on PREPA Reorganization related work as required. This include work related to the GridCo-GenCo PPOA and Shared Services agreement.
- Finalization of the Federally Funded Procurement Manual.
- b. Human Resources
  - Continue evaluations and interviews of external candidates. Note, LUMA will continue to accept PREPA applications and will consider such applicants accordingly.
  - For PREPA candidates that have been interviewed, job offers with terms of employment will be presented.
  - Continue to engage with PREPA employees to guide them through hiring process.
- c. Operational and Customer Experience
  - Continue detailed transition planning work based on information gathered to date towards appropriate commencement cutover plans.
  - Begin build of cloud-based contact center with implementation partner.
  - Continue development of the Emergency Response, Physical Security, Materials Management & Warehouse and Vegetation Management Plans.
  - Continue skills assessments of skilled workforce.
  - Plan tabletop drill exercise of LUMA's Emergency Response Plan with FEMA to obtain their feedback and ensure alignment.
- d. Finance and Accounting
  - Continued the development of the Fiscal Plan between PREPA, FOMB and LUMA.
  - Review of office space and commercial building asset information and develop preventative maintenance schedules and asset replacement programs.
  - Finalization of the Non-Federally Funded Procurement Manual.
  - Complete End-to-End and System Integration Testing (i.e. verification of interactions between systems) of critical financial systems.
- e. Information and Operational Technology
  - Continue buildout on the IT OT Commencement Cutover Program Plan.
  - Continue Vendor engagement and finalize alignment on current projects with LUMA and PREPA.
  - Prepare drafts of the IT Business Continuity and Disaster Recovery Plan.
  - Progress on key application implementations required for commencement.

### 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 February.

## 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
4.1(d)(iii)	System Remediation Plan: ...Operator shall submit for PREB's review the proposed System Remediation Plan, incorporating or rejecting any of the modifications or changes suggested by Administrator, together with an explanation of any of Administrator's comments, as ManagementCo shall reasonably deem appropriate in its sole discretion.	LUMA (Operator)	Submitted to PREB in February
4.1(g)	Parties to apply for Liability Waiver with Rate Order in connection with submission of Initial Budgets.	LUMA (Operator)	Submitted to PREB in February
4.1(h)	System Operation Principles: ...Operator shall submit for PREB's review the proposed System Operation Principles, incorporating or rejecting any of the modifications or changes suggested by Administrator, together with an explanation of any of Administrator's comments, as ManagementCo shall reasonably deem appropriate in its sole discretion.	LUMA (Operator)	Submitted to PREB in February
4.2 (e)	Initial Budgets: ...Operator shall submit for PREB's review the revised Initial Budgets, incorporating or rejecting any of the modifications or changes suggested by Administrator, together with an explanation of any of Administrator's comments, as ManagementCo shall reasonably deem appropriate in its sole discretion.	LUMA (Operator)	Submitted to PREB in February
4.2(f)	Performance Metrics: ...Operator shall submit for PREB's review the proposed revised Annex IX (Performance Metrics), incorporating or rejecting any of the modifications or changes suggested by Administrator, together with an explanation of any of Administrator's comments, as ManagementCo shall reasonably deem appropriate in its sole discretion.	LUMA (Operator)	Submitted to PREB in February
4.2(j)	As soon as reasonably practicable following the Effective Date but not less than ninety (90) days prior to the Target Service Commencement Date (the "Interview Deadline"), 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").	LUMA (Operator)	Completed first round interviews in February

## II. 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 - January
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 - January
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 – January
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 – January
4.3(d) (ii)	After the date ManagementCo submits the Initial Budgets to PREB for its approval, if Owner and Administrator determine that an amendment or new System Contract or Generation Supply Contract is necessary, the Parties shall follow the process in clause (i) above; provided that as part of such consultation process (A) the Parties shall review the impact of any such amendment or new System Contract and Generation Supply Contract on the Initial Budgets and (B) ManagementCo shall, as soon as practicable following receipt of Owner's notice of such requirement, prepare and submit to Administrator any proposed amendment to the Initial Budgets arising therefrom. Following delivery of such proposed amendment, the Parties shall follow the same process for such amendment to the Initial Budget that was followed for the Initial Budgets as set out in Section 4.2(e) (ManagementCo Responsibilities – Initial Budgets);	LUMA (Operator), PREPA (Owner), P3A (Administrator)	Ongoing
4.3(d)(i)	Additional System Contracts and Generation Supply Contracts Between Effective Date and Service Commencement Date.	P3A (Administrator) PREPA (Owner)	On-going (Refer to Part C.4)



Section	Description	Responsible Party	Status
	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.		
STA s. 2.3(c)	Owner shall have provided communications to all Owner Employees regarding Owner's pension obligations going forward reasonably acceptable to Owner and Operator.	PREPA (Owner)	Refer to Part C.2

### III. Overdue OMA Obligations

Section	Description	Responsible Party	Status
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), P3A (Administrator)	Substantially overdue (Refer to Part C.5)
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)	Substantially overdue (Refer to Part C.5)
4.3(c)	From and after the Effective Date, but in any event by the date that is one hundred eighty (180) days following the Effective Date, 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)	Overdue (Refer to Part C.4)

#### IV. OMA Obligations in Progress

Section	Description	Responsible Party	Status
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)	Refer to Part C.4
STA s. 2.3(d)	Owner shall have provided Operator with written notice of the System Contracts and Generation Supply Contracts that have been assumed and those that have been rejected as at the Interim Period Service Commencement Date;		
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 (Refer to Part C.6)
4.4(a)	ManagementCo, Administrator and Owner shall coordinate identifying the Governmental Approvals required for the commencement on the Service Commencement Date. Once the 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.	LUMA (Operator) P3A (Administrator) PREPA (Owner)	In progress
4.4(b)	From and after the Effective Date, the Parties agree that (i) 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. (refer to 4.5 (t) below)	LUMA (Operator) P3A (Administrator) PREPA (Owner)	In progress
4.5 (t)	The Puerto Rico Treasury Department shall have either (i) entered into a closing agreement with the Operator, or (ii) shall have issued a private letter ruling to Operator, in each case that (A) incorporates all matters set forth in administrative determination No. 20-06 issued by the Secretary of the Puerto Rico Treasury Department (the "Administrative Determination") that	LUMA (Operator) P3A (Administrator) PREPA (Owner)	In progress

Section	Description	Responsible Party	Status
	are applicable to Operator and the Equity Participants and (B) provides that (x) the Front-End Transition Service Fixed Fee, the Service Fee and 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, (each a "Tax Assurance").		
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)	In progress
STA s. 2.3(b)	The Title III Court shall have entered, on a final and non-appealable basis, an order or orders (i) to the extent required by Applicable Law, authorizing Owner's entry into and performance of this Supplemental Agreement, and (ii) granting administrative expense treatment for any amounts required to be paid by Owner under this Supplemental Agreement and the O&M Agreement during the Interim Period, and in the case of each of (i) and (ii), such approvals and orders shall be reasonably acceptable to Operator;	P3A (Administrator) PREPA (Owner)	Refer to Part C.3
STA s. 2.3(c)	A number of Owner Employees and Other Employees necessary for Operator to perform the Interim Period Services shall have accepted offers to commence employment as ServCo Employees beginning on the Interim Period Service Commencement Date;	LUMA (Operator)	In progress
STA s. 2.3(f)	Owner shall have received a Supplemental Agreement Tax Opinion and ManagementCo shall have received a Supplemental Agreement Reliance Letter, at the expense of Owner or Administrator;	PREPA (Owner)	In progress (Refer to Part C.7)

## V. Upcoming OMA Obligations

Section	Description	Responsible Party	Status
	No Upcoming OMA Obligations in the next month		

## C. RISK AND ISSUE MANAGEMENT REPORT

### Risks/Issues with Potential to Materially Impact Project Success

	Risk	Description and Current Status (as of 02-28-21)
1	<p>PREPA Reorganization (s. 4.5(q))</p> <p><i>Lead Party: P3A (Administrator)</i></p>	<p>The OMA states as a Condition Precedent to Commencement that <i>“A final plan for the reorganization of PREPA into GenCo and GridCo shall have been approved by the applicable Governmental Bodies, and the GridCo-GenCo PPOA shall have become effective.”</i></p> <p>As noted in previous months, there remains a considerable effort to complete the reorganization of PREPA involving multiple parties. Work progressed in February; however, the final structure remains undetermined.</p> <p>The PREPA Reorganization is related to the associated conditions precedent for the GenCo-GridCo PPOA and Shared Services Agreement to be executed.</p>
2	<p>Communication of Pension Obligations (s. 2.3 (c) of the STA)</p> <p><i>Lead Party: PREPA (Owner)</i></p>	<p>The Supplemental Terms Agreement to the OMA states as a condition to the Interim Service Period Commencement Date <i>“Owner shall have provided communications to all Owner Employees regarding Owner’s pension obligations going forward reasonably acceptable to Owner and Operator”.</i></p> <p>PREPA recently released informational videos and distributed a letter to its employees on March 5<sup>th</sup> related to the existing Pension. As previously noted, an understanding of the existing pension remains the most significant issue raised by current PREPA employees as a reason for not applying for LUMA positions. LUMA urges on-going communication in this area from PREPA leadership to continually respond to concerns and questions from employees.</p>
3	<p>Title III Court Order (s. 2.3 (b) of the STA)</p> <p><i>Lead Parties: PREPA (Owner); P3A (Administrator)</i></p>	<p>The Supplemental Terms Agreement to the OMA states as a Condition Precedent to Commencement <i>“the Title III Court shall have entered, on a final and non-appealable basis, an order or orders (i) to the extent required by Applicable Law, authorizing Owner’s entry into and performance of this Supplemental Agreement, and (ii) granting administrative expense treatment for any amounts required to be paid by Owner under this Supplemental Agreement and the O&amp;M Agreement during the Interim Period, and</i></p>

	Risk	Description and Current Status (as of 02-28-21)
		<p><i>in the case of each of (i) and (ii), such approvals and orders shall be reasonably acceptable to Operator”.</i></p> <p>LUMA notes that while work on this front has begun and filing and scheduling dates agreed with counsel for the FOMB and AAFAF, this condition will necessarily depend on the timeline of the Title III Court.</p>
4	<p>Systems Contracts</p> <p>(s. 4.3 (c); s. 4.3 (d)(i); s. 4.3 (e); STA s. 2.3(d))</p> <p>Lead Party: PREPA (Owner)</p>	<p>The OMA and STA states as a Condition Precedents to Commencement that:</p> <ul style="list-style-type: none"> <li>- <i>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. S. 4.3 (c)</i></li> </ul> <p>Over the past month, LUMA and PREPA worked to ensure that all material System Contracts, and Generation Supply Contracts have been identified and copies provided to LUMA. LUMA has now received the majority of the System Contracts and has begun to assess these contracts to fully understanding obligations/commitments post commencement.</p> <ul style="list-style-type: none"> <li>- <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:</i> <ul style="list-style-type: none"> <li><i>(i) 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;</i></li> </ul> </li> </ul>

	Risk	Description and Current Status (as of 02-28-21)
		<p>During February, P3A/LUMA began receiving <i>Additional System Contracts</i> for review. This provision is now being complied with.</p> <ul style="list-style-type: none"> <li>- <i>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; ... (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. (s. 4.3 (e))</i></li> <li>- <i>Owner shall have provided Operator with written notice of the System Contracts and Generation Supply Contracts that have been assumed and those that have been rejected as at the Interim Period Service Commencement Date. (STA s. 2.3(d))</i></li> </ul> <p>LUMA and PREPA have begun discussing a mutually acceptable approach to providing Notice to contractors.</p> <p>LUMA notes that while this area appears on track, the delay in the receipt of System Contracts has created real impacts on time available to conduct operational and commercial assessments.</p>
5	<p>Owner Cooperation (s. 4.1 (b))</p> <p><i>Lead Party: PREPA (Owner)</i></p>	<p>LUMA has experienced progress during February and will continue to work with PREPA to work through specific issues to minimize impacts. Key areas of note include:</p> <ul style="list-style-type: none"> <li>- <u>Designated Space &amp; Facilities</u>: Since the last report on this matter, PREPA has developed and communicated a plan for implementation in March to address LUMA’s current needs. Work in this area will begin to include the transition planning as we approach commencement.</li> <li>- <u>Response to RFIs</u>: Communication in this area has improved over the past month; however, the lack of and untimely response to RFIs continues to be an issue impacting LUMA’s ability to form a complete understanding of operations and establish seamless cutover workplans.</li> </ul>

	Risk	Description and Current Status (as of 02-28-21)
		- <u>FEMA Funding Management</u> : LUMA notes that collaboration continues in this area as the LUMA and PREPA teams have worked to ensure alignment and understanding of work underway as well as the current project management structure.
6	Demarcation of T&D System (s. 4.3(k))  <i>Lead Party: PREPA (Owner)</i>	Description and demarcation of the T&D System effects LUMA's ability to properly insure the system and is critical to the satisfaction of conditions precedent relating to the PREPA Reorganization and Shared Services Agreement.  It is LUMA's understanding that some work has been done by Sargent & Lundy on this front but more is required.
7	Supplemental Agreement Tax Opinion STA (s. 2.3(f))  <i>Lead Party: PREPA (Owner)</i>	LUMA continues to be concerned about the lack of progress on this front. Nixon Peabody requires a report or an update on the reasonably expected weighted average economic life of the T&D System to issue its opinion and has not yet received one. LUMA has reminded PREPA of this obligation and enlisted the assistance of P3A to ensure an updated report is prepared and delivered to Nixon Peabody.
8	COVID-19 Pandemic	The COVID-19 pandemic continues to create challenges for LUMA.  LUMA is following an appropriate COVID Protocol and using virtual tools including Microsoft Teams for meetings helps communications but consumes significantly more time and is less productive.

## 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 February 2021. A summary of the invoice amounts is included below.

### I. Monthly invoice summary

FET COSTS	
Department	Amount
Capital Programs	\$111,275
Communications	\$75,625
Corporate Services	\$205,430
Customer Service	\$169,940
Executives	\$93,225
Financial Mgmt.	\$404,898
HSE & Quality	\$267,175
Human Resources	\$183,918
Integration Mgmt. Office	\$215,463
IT / OT	\$279,730
Legal	\$58,570
Operations	\$488,690
Regulatory	\$395,663
Utility Transformation	\$883,143
<b>TOTAL</b>	<b>\$3,832,743</b>

	FET Hourly Costs	Additional Costs & Expenses	Sub-Total	FET Fixed Fee	Total
Previously invoiced	\$27,300,563	\$25,036,499	\$52,337,062	\$36,500,000	\$88,837,062
Current invoice	\$3,832,743	\$4,034,694	\$7,867,437	\$5,000,000	\$12,867,437
Total invoiced to date	\$31,133,305	\$29,071,194	\$60,204,499	\$41,500,000	\$101,704,499
Forecast to complete			\$31,795,501	\$18,500,000	\$50,295,501
Proposal			\$76,351,931	\$60,000,000	\$136,351,931
Variance					\$15,648,069
					11.5%

LUMA conducted a review of forecast cost for the remainder of the FET period and has communicated to the P3A an update to our forecast. The forecast increase is mainly due to a delay in execution of the OMA to late June 2020, the significant challenges associated with COVID-19, the state of the electrical system and the resultant complexity of the FET effort, as well as some additional work scope. LUMA's forecast are the necessary expenditures under the OMA to ensure Day 1 operations.



## E. SUBMISSIONS

## I. Transmittals–Current Month February 2021

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Created
LUMA-P3A-T-00094	Key Regulatory Deliverables	LUMA	P3A	IMO	3-Feb-21
LUMA-P3A-T-00095	Submission of Key Regulatory Deliverables - Briefs	LUMA	P3A	IMO	5-Feb-21
LUMA-P3A-T-00096	Key Regulatory Deliverables - Performance Metrics	LUMA	P3A	IMO	6-Feb-21
LUMA-P3A-T-00097	January 2021 Monthly Invoice & Report	LUMA	P3A	IMO	9-Feb-21
LUMA-P3A-T-00098	January 2021 Monthly Status Report	LUMA	P3A	IMO	9-Feb-21
LUMA-P3A-T-00099	January 2021 Renewed Certificates	LUMA	P3A	IMO	9-Feb-21
LUMA-P3A-TGC-00100	P3A / LUMA February 1, 2021 Meeting Notes	LUMA	P3A	IMO	9-Feb-21
LUMA-P3A-TGC-00101	P3A / LUMA March 1, 2021 Meeting Agenda	LUMA	P3A	IMO	9-Feb-21
LUMA-P3A-T-00102	4.5 Month FETS Estimate January 2021 (w Actuals)	LUMA	P3A	IMO	19-Feb-21
LUMA-P3A-T-00103	List of Material Contractors 2021-02-19	LUMA	P3A	IMO	22-Feb-21
LUMA-P3A-T-00104	4.5 Month FETS Estimate February 2021	LUMA	P3A	IMO	23-Feb-21
LUMA-PREB-T-00023	January 2021 Monthly Status Report	LUMA	PREB	IMO	9-Feb-21
LUMA-PREP-T-00087	S&L Codes and Standards Submittal 2020-12-23 LUMA's Comments	LUMA	PREPA	Utility Transformation	5-Feb-21
LUMA-PREP-T-00088	Outstanding RFIs as of February 5, 2021	LUMA	PREPA	IMO	5-Feb-21
LUMA-PREP-TGC-00089	PREP / LUMA Biweekly Meeting Notes 2021-02-01	LUMA	PREPA	IMO	5-Feb-21
LUMA-PREP-TGC-00090	PREPA / LUMA Biweekly Meeting Agenda 2021-02-08	LUMA	PREPA	IMO	5-Feb-21
LUMA-PREP-T-00091	LUMA Representatives for 10yr Plan Infrastructure Meetings	LUMA	PREPA	IMO	8-Feb-21
LUMA-PREP-T-00092	January 2021 Monthly Status Report	LUMA	PREPA	IMO	9-Feb-21
LUMA-PREP-T-00093	S&L Codes and Standards Submittal 2021-01-15 LUMA's Comments	LUMA	PREPA	Utility Transformation	10-Feb-21
LUMA-PREP-T-00094	Outstanding RFIs as of February 11, 2021	LUMA	PREPA	IMO	11-Feb-21
LUMA-PREP-T-00095	Outstanding RFIs as of 2021-02-18	LUMA	PREPA	IMO	18-Feb-21
LUMA-PREP-TGC-00096	PREPA / LUMA Biweekly Meeting Notes 2021-02-08	LUMA	PREPA	IMO	19-Feb-21
LUMA-PREP-TGC-00097	PREPA / LUMA Biweekly Meeting Agenda 2021-02-23	LUMA	PREPA	IMO	19-Feb-21
LUMA-PREP-T-00098	Transmission Line Design Revision, OTOH-690003-003	LUMA	PREPA	Utility Transformation	22-Feb-21

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Created
LUMA-PREP-T-00099	LUMA comments relating to PREPA RFP 11105-LIDAR Services	LUMA	PREPA	Utility Transformation	24-Feb-21
LUMA-PREP-T-00100	Outstanding RFIs as of 2021-02-25	LUMA	PREPA	IMO	25-Feb-21
P3A-LUMA-T-00009	System Contract - Burns & McDonnell	LUMA	LUMA	IMO	22-Feb-21
P3A-LUMA-T-00010	System Contracts - Architectural and Engineering Design Services	LUMA	P3A	IMO	22-Feb-21
P3A-LUMA-T-00011	A&E Ray-Seco, PSC	LUMA	LUMA	IMO	22-Feb-21
P3A-LUMA-T-00012	System Contract - ShareTech Group Engineering, PSC	P3A	LUMA	IMO	22-Feb-21
P3A-LUMA-T-00013	System Contract - Norton Rose Fulbright US, LLP	P3A	LUMA	IMO	22-Feb-21
P3A-LUMA-T-00014	Key Regulatory Deliverables - P3A Comments	P3A	LUMA	IMO	22-Feb-21
P3A-LUMA-T-00015	System Contract - Sargent & Lundy	LUMA	LUMA	IMO	23-Feb-21
P3A-LUMA-T-00016	Key Regulatory Deliverables - SOP and SRP Approval Letter	P3A	LUMA	IMO	23-Feb-21
P3A-LUMA-T-00017	System Contracts - KPMG Second Amendment	P3A	PREPA	IMO	25-Feb-21
P3A-LUMA-T-00018	System Contracts - DRC Emergency Services - Third Amendment	P3A	LUMA	IMO	25-Feb-21

## II. Requests for Information (RFIs)—Current Month February 2021

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00377	EBS & Kronos System Access for Justin Handel	LUMA	PREPA	IT/OT	1-Feb-21	2-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00378	New User Access - Justin Callan - Full access to Kronos & Oracle EBS	LUMA	PREPA	IT/OT	1-Feb-21	2-Feb-21	17-Feb-21	Closed
LUMA-PREP-RFI-00380	PREPA IT participation	LUMA	PREPA	IT/OT	2-Feb-21	5-Feb-21	8-Feb-21	Closed
LUMA-PREP-RFI-00381	Access/documentation	LUMA	PREPA	IT/OT	3-Feb-21	9-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00382	Distribution Fault Level Currents	LUMA	PREPA	Utility Transformation	3-Feb-21	10-Feb-21	5-Feb-21	Closed
LUMA-PREP-RFI-00383	New User access Luis Astacio - VPN & Kronos	LUMA	PREPA	IT/OT	5-Feb-21	12-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00387	Kronos New User Access - • Christian Soto	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	17-Feb-21	Closed

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00388	Kronos New User Access - • Mario Zottola	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	17-Feb-21	Closed
LUMA-PREP-RFI-00389	Kronos New User Access - • Alba Basilis	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	17-Feb-21	Closed
LUMA-PREP-RFI-00390	Kronos New User Access - • Javier Lajcha	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	17-Feb-21	Closed
LUMA-PREP-RFI-00391	Kronos New User Access - • Leo Cazes	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	22-Feb-21	Closed
LUMA-PREP-RFI-00392	Kronos New User Access - Sergio Legu	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21	17-Feb-21	Closed
LUMA-PREP-RFI-00395	Request (New Employee Numbers in STORMS)	LUMA	PREPA	Financial Management	11-Feb-21	12-Feb-21	12-Feb-21	Closed
LUMA-PREP-RFI-00402	Technology Systems Access	LUMA	PREPA	Utility Transformation	17-Feb-21	19-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00403	Kronos Remote Desktop Access - Sergio Leguen	LUMA	PREPA	IT/OT	17-Feb-21	19-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00404	New Access Request - Justin Handel EBS Access	LUMA	PREPA	IT/OT	18-Feb-21	24-Feb-21	23-Feb-21	Closed
LUMA-PREP-RFI-00405	Request for Mi Cuenta 3.0 access to Development environment	LUMA	PREPA	IT/OT	18-Feb-21	19-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00406	TWACS DB Extracts v2	LUMA	PREPA	IT/OT	18-Feb-21	25-Feb-21	19-Feb-21	Closed
LUMA-PREP-RFI-00409	LUMA PO Branded Template in Asset Suite	LUMA	PREPA	IT/OT	18-Feb-21	5-Mar-21	22-Feb-21	Closed
LUMA-PREP-RFI-00412	Kronos to Workday PGP Encryption and Integration Flow	LUMA	PREPA	IT/OT	19-Feb-21	23-Feb-21	25-Feb-21	Closed
LUMA-PREP-RFI-00365	Fleet - Purchases, Leases, Rentals, and Repairs	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00366	Fleet - Preventive Maintenance Strategies and Programs	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00367	Fleet - Fleet Focus	LUMA	PREPA	Operations	1-Feb-21	13-Feb-21		Open
LUMA-PREP-RFI-00368	Fleet - Asset Suite and Oracle	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00369	Fleet - Fleet Asset Register (FAR)	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00370	Key Performance Indicators (KPIs)-Fleet	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00371	Fleet - Ownership Costs	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00372	Fleet - DVIR	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00373	Fleet - Small Tools	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00374	Telematics Service Provider	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00375	Fleet - Fixed Asset Audit	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00376	Fleet - Maintenance Records for Commercial Vehicles	LUMA	PREPA	Operations	1-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00379	Kronos Licenses held by terminated employees	LUMA	PREPA	IT/OT	1-Feb-21	28-Feb-21		Open
LUMA-PREP-RFI-00384	Electrical Account GIS Data	LUMA	PREPA	Utility Transformation	8-Feb-21	19-Feb-21		Open
LUMA-PREP-RFI-00385	metering processes and procedures	LUMA	PREPA	Utility Transformation	9-Feb-21	23-Feb-21		Open
LUMA-PREP-RFI-00386	Install/Integrate Intouch time device to LUMA Dev/Test instances	LUMA	PREPA	IT/OT	9-Feb-21	12-Feb-21		Open
LUMA-PREP-RFI-00393	Request for Information - Satellite Phones	LUMA	PREPA	Operations	9-Feb-21	16-Feb-21		Open
LUMA-PREP-RFI-00394	IT OT Vendor Support Contact Information	LUMA	PREPA	IT/OT	11-Feb-21	19-Feb-21		Open
LUMA-PREP-RFI-00396	Printer vendor	LUMA	PREPA	IT/OT	12-Feb-21	18-Feb-21		Open
LUMA-PREP-RFI-00397	Mobile App Architecture Diagrams	LUMA	PREPA	IT/OT	15-Feb-21	19-Feb-21		Open
LUMA-PREP-RFI-00398	CARILEC Membership for Mutual Aid	LUMA	PREPA	HSE & Quality	15-Feb-21	26-Feb-21		Open
LUMA-PREP-RFI-00399	APPA Membership for Mutual Aid	LUMA	PREPA	HSE & Quality	15-Feb-21	26-Feb-21		Open
LUMA-PREP-RFI-00400	Distribution and Transmission Fiber Optic System	LUMA	PREPA	Operations	16-Feb-21	5-Mar-21		Open
LUMA-PREP-RFI-00401	PREPA Intranet access for Amy Kingshott	LUMA	PREPA	Customer Service	16-Feb-21	19-Feb-21		Open
LUMA-PREP-RFI-00407	Jira access for mobile app testing	LUMA	PREPA	IT/OT	18-Feb-21	22-Feb-21		Open
LUMA-PREP-RFI-00408	Full system user access	LUMA	PREPA	IT/OT	18-Feb-21	23-Feb-21		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00410	VPN and CC&B Access request	LUMA	PREPA	IT/OT	19-Feb-21	22-Feb-21		Open
LUMA-PREP-RFI-00411	New Onboarding Request -SD , Lakshmi EBS, SOA Access Request	LUMA	PREPA	IT/OT	19-Feb-21	22-Feb-21		Open
LUMA-PREP-RFI-00413	Genesys to PREPA network connectivity	LUMA	PREPA	IT/OT	22-Feb-21	1-Mar-21		Open
LUMA-PREP-RFI-00414	PREPA 2019 and 2020 safety raw data and metrics calculation	LUMA	PREPA	HSE & Quality	23-Feb-21	26-Feb-21		Open
LUMA-PREP-RFI-00415	A&E scope that PREPA is working with Contractors	LUMA	PREPA	Capital Programs	23-Feb-21	25-Feb-21		Open
LUMA-PREP-RFI-00416	Follow up on RFI-00395	LUMA	PREPA	Financial Management	23-Feb-21	25-Feb-21		Open
LUMA-PREP-RFI-00417	Service Level Agreements by Contract	LUMA	PREPA	IT/OT	23-Feb-21	5-Mar-21		Open
LUMA-PREP-RFI-00418	LUMA request a visit of the NOC in Santurce	LUMA	PREPA	Utility Transformation	24-Feb-21	1-Mar-21		Open
LUMA-PREP-RFI-00419	User Access Roles	LUMA	PREPA	IT/OT	24-Feb-21	4-Mar-21		Open
LUMA-PREP-RFI-00420	STORMS & PD Storms for company 01 and 03	LUMA	PREPA	Financial Management	24-Feb-21	25-Feb-21		Open
LUMA-PREP-RFI-00421	Telecom Tower Maintenance Records	LUMA	PREPA	Operations	24-Feb-21	12-Mar-21		Open
LUMA-PREP-RFI-00422	EMS - "Functional Specifications"	LUMA	PREPA	Utility Transformation	24-Feb-21	10-Mar-21		Open
LUMA-PREP-RFI-00423	Advanced Distribution Monitoring System (ADMS) (OT/Backoffice)	LUMA	PREPA	Utility Transformation	24-Feb-21	10-Mar-21		Open
LUMA-PREP-RFI-00424	Energy Management System (EMS) (OT/Backoffice)	LUMA	PREPA	Utility Transformation	24-Feb-21	10-Mar-21		Open
LUMA-PREP-RFI-00425	Centro de Operaciones del Sistema Eléctrico – COSE	LUMA	PREPA	Utility Transformation	24-Feb-21	10-Mar-21		Open
LUMA-PREP-RFI-00426	STORMS Workshop	LUMA	PREPA	IT/OT	24-Feb-21	26-Feb-21		Open
LUMA-PREP-RFI-00427	NOC in Santurce	LUMA	PREPA	IT/OT	24-Feb-21	1-Mar-21		Open
LUMA-PREP-RFI-00428	SCADA Monitored Distribution Devices	LUMA	PREPA	IT/OT	25-Feb-21	4-Mar-21		Open
LUMA-PREP-RFI-00429	Batch Schedule Documentation	LUMA	PREPA	IT/OT	25-Feb-21	2-Mar-21		Open

Name	Description	Sending Organization	Receiving Organization	LUMA Department	Date Submitted	Requested Response Date	Actual Response Date	Status
LUMA-PREP-RFI-00430	EBS & VPN Access Request	LUMA	PREPA	IT/OT	26-Feb-21	3-Mar-21		Open
LUMA-PREP-RFI-00431	PREPA 10 years investment plan	LUMA	PREPA	Utility Transformation	26-Feb-21	10-Mar-21		Open
LUMA-PREP-RFI-00432	MotoTRBO assessment report	LUMA	PREPA	Operations	26-Feb-21	12-Mar-21		Open
LUMA-PREP-RFI-00433	Windspeed Microzone Maps	LUMA	PREPA	Utility Transformation	26-Feb-21	12-Mar-21		Open

## APPENDIX A – HANDOVER CHECKLIST

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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>	71-80%	<p>The work in February 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"> <li>- In addition to the general management efforts noted above, there are more specific activities that were completed: <ul style="list-style-type: none"> <li>- Supported the submission of the Initial Budgets, System Remediation Plan (and Program Briefs), Performance Metrics and System Operation Principles including necessary internal approvals.</li> <li>- Undertook LUMA wide commencement readiness assessment. This work will be an iterative process undertaken until commencement that will focus on mitigation of key risk areas including interdependencies between departments.</li> <li>- Administrative and logistics work required to support the ongoing work of LUMA.</li> <li>- Overall project management including efforts such as document controls (RFI &amp; transmittal) and the preparation of the required invoicing &amp; reporting.</li> <li>- 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.</li> <li>- On-going collaborated with PREPA to obtain and setup access to PREPA offices.</li> <li>- Continued efforts expended to manage areas related to the requirements of the COVID 19 pandemic.</li> </ul> </li> </ul>
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>	61-70%	<ul style="list-style-type: none"> <li>- Submitted consultation request to the Oficina General de Permisos (OGPE), jointly with PREPA and P3A, for required permits that are not under the jurisdiction of the Department of Natural Resources.</li> <li>- Established with PREPA a procedure to transfer FCC licenses.</li> <li>- Completed review of requirements for application of LUMA hangar license for operation.</li> <li>- Follow up continues with PREPA and P3A relating to the document submitted to the Department of Natural Resources, OGPE, and other agencies with respect to permits under each of their authority.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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%	- Continued to manage the Requests for Information & responses related to gap assessments. These are being used to further develop LUMA's cutover plans.
1.03	PREB Rate Order Filing (Initial Budgets and Liability Waiver approvals)	Activities to gain P3A and regulatory (PREB) approvals for Initial Budgets.	51-60%	- Review, discussed and incorporated comments from P3A, developed petitions and submitted to PREB in late February. Awaiting PREB regulatory process.
2	<b>T&amp;D Services Milestones</b>			
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.	81-90%	- Progressed draft takeover plan. - Coordination of maintenance plan responsibilities with Engineering. - Assessment of loading predictive analysis capability under review. - Began conducting site visits to substations with high priority in capital 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 streetlight operations and repair strategy.	81-90%	- Progressed draft takeover plan. - Worked with Engineering and operations to align maintenance plans and schedules.
2.03	<b>Development and Implementation of Additional Takeover plans</b>			
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.	71-80%	- Continued recruitment effort for Control Centers. Interviews completed at 90% for the shift personnel positions. All positions are posted and interviews for Managers and Supervisors ongoing. Interviews for staff position (engineers, analysts, planner, etc.) started. - Continued to support the ongoing efforts in developing the System Operating Principles and procedures in collaboration with LUMA's Regulatory team. - Continued drafting of the Transition plan.
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.	51-60%	- Continued working through a joint initiative with the Procurement team to identify, prioritize, and compile supporting documentation, for key contracts/contractors. - Performed secondary interviews for some supervisory and managerial positions within LUMA Operations. - Worked on initiative to define interdepartmental Operational Policies between Operations and Others.



ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
				<ul style="list-style-type: none"> <li>- Kicked-off initiatives to understand the workload for Planned Operation &amp; Maintenance (O&amp;M), Unplanned O&amp;M, and Customer Service Work.</li> </ul>
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, customer centricity, affordability, reliability, resilience and sustainability.	51-60%	<ul style="list-style-type: none"> <li>- Third draft of the ERP (Base Plan and Restoration Annex) was distributed for review and feedback. Inputs received and recommendations are being incorporated in the final draft.</li> <li>- Working on membership applications with EEI, APPA, and CARILEC. In addition, reviewing current PREPA master service agreements with local companies.</li> <li>- Crisis Management Framework established. All plans in progress (Business Continuity, Risk Management, Communications, Health &amp; Safety, and Security).</li> <li>- LUMA ERP Technical Workshop with leadership team has been re-scheduled for March 3, 2021 due to severe winter weather in Texas which affected the training facilitator. Tabletop Drill exercise is planned for the month of April to obtain feedback and align with FEMA further enhancing the LUMA Emergency Response Plan.</li> </ul> <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.	61-70%	<ul style="list-style-type: none"> <li>- Onboarding of Director for the LUMA Fleet Management Group.</li> <li>- Continued work on the Fleet Management Plan (in final stages of revisions prior to submission).</li> <li>- Continued work on the Standard Operating Procedures.</li> <li>- Began work with Procurement for critical RFQs needed for commencement.</li> </ul>
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.	81-90%	<ul style="list-style-type: none"> <li>- Reviewed first draft of Asset Management Plan.</li> <li>- Begin prioritization and resource estimation for implementation of Asset Management plan.</li> <li>- Begin first pass of Preventive Maintenance prioritization with Engineering and Operations.</li> <li>- Worked with Capital Programs and IEM to develop process for federally funded projects.</li> <li>- Held meetings with PREPA consultants and PREPA to prioritize and coordinate work on flooded substations.</li> <li>- Submitted final draft of interconnection process documents for internal review.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	71-80%	<ul style="list-style-type: none"> <li>- The Skilled Labor Assessments for Line Workers was initiated during the month of February. To date, there have been over 150 Line workers and 80 Technicians that have completed the assessments.</li> <li>- Additional assessments will be scheduled in the coming weeks as both internal and external applications are received by LUMA.</li> <li>- Ongoing meetings with Human Resources and Operations leadership are being held to evaluate in real time the number applicants, resource needs for conducting the assessments, and the timing and execution of conducting additional assessments.</li> <li>- Based of the results of the initial Skilled Labor Assessments, an initial training needs analysis is being completed and discussed in conjunction with Operations and Human Resources.</li> <li>- The permit for the Aguadilla assessment site has been submitted and is awaiting approval so that site construction can begin.</li> </ul> <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist item 8.07)</p>
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.	61-70%	<ul style="list-style-type: none"> <li>- Developed the framework and table of contents for the Safety Management Plan.</li> <li>- Contributed to T&amp;D Takeover Plan section entitled Safety Reinforcement Plan.</li> <li>- Finalized Public Safety Plan; currently under review internally.</li> <li>- Drafted HSEQ IT software contracts for development and operations with selected provider.</li> <li>- Advanced on several critical topics such as Occupational Services provider requirements; DOT/Fleet, including driver files and qualification records; HS policies (Inspections and Audits, and Job Briefings); physical demand analysis plan for new hire positions, among others.</li> <li>- Drafted Emergency Action Plan. Plan is under review by Facilities and Corporate Security.</li> <li>- Concluded interviews with PREPA candidates.</li> <li>- Significant time spent on COVID 19 related matters; administering and responding to the COVID 19 protocol requirements.</li> </ul>
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.	61-70%	<ul style="list-style-type: none"> <li>- Continue the development of the maintenance practices standards.</li> <li>- Continue the PREPA Specifications: Continued the review, provided comments and recommendations to S&amp;L and PREPA for incorporation on the standards and specifications.</li> <li>- PREPA 2021FY Project Oversight: Continue to provide guidance and input to the Cataño (38/13.8 kV) Substation Pilot and the review of potential projects.</li> <li>- Renewable Interconnection Process: Continued the development of the LUMA Processes, conducted internal workshops.</li> <li>- Street Light Program: Continued the development of the new Implementation plan recommendations.</li> <li>- New Customer Services: Continued to review the existing PREPA processes and identifying improvements for an updated process.</li> <li>- Participated in the PREPA's Transmission and Substations Working Groups.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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..	91-99%	<ul style="list-style-type: none"> <li>- Completed Health Assessments on medium-priority facilities.</li> <li>- Low priority facilities health assessments are underway.</li> <li>- Reviewing completed medium-priority Health Assessment reports, utilizing information to create property summary sheets.</li> </ul> <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist items 10.02)</p>
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.	61-70%	<ul style="list-style-type: none"> <li>- Continued interviewing PREPA internal applicants and began review of external candidates.</li> <li>- Began development of operational forms, templates, and processes.</li> <li>- Initiated procurement process for key commencement contracts.</li> <li>- Began assessment of existing key PREPA service contracts.</li> <li>- Began detailed review of day 1 requirements and started creation of a cutover plan.</li> </ul>
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.	41-50%	<ul style="list-style-type: none"> <li>- Continued development of the Standard Operating Procedure document for LUMA Operations.</li> <li>- Continue to work on IT program workflows and processes for execution of field work.</li> </ul>
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.	61-70%	<ul style="list-style-type: none"> <li>- Finalized drafting contract requisition form for Vegetation Maintenance services: Distribution Preventive Maintenance, Transmission IVM, Corrective Maintenance.</li> <li>- Continued development of work procedures for vegetation managements with the participation of PREPA staff.</li> </ul>
2.04	Update Emergency Operations Manual and Business Continuity/Disaster Recovery Plan	This deliverable is the same as Handover Checklist item 2.0303	Refer to 2.0303	<ul style="list-style-type: none"> <li>- Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.0303 and 9.02.</li> </ul>
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.	61-70%	<ul style="list-style-type: none"> <li>- Consulted FEMA and Puerto Rico State Historic Preservation Office (SHPO) with PREPA and PREPA Consultant for system restoration projects, completed PREPA's endangered species awareness training.</li> <li>- Drafted procedures for tank inspections, fuel handling, and spill prevention planning; procedures being reviewed by Operations.</li> <li>- Finalized interviews with PREPA employees for environmental positions post commencement.</li> <li>- Work continued on PREPA Baseline Environmental Study. Three (3) draft reports and nine (9) final reports received in February, next batch of sites planned for field assessments. LUMA is working with PREPA and Stantec to accelerate this work.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
				- Discussed due care planning process with operations, translated due care plan templates, and included references to internal environmental procedures.
<b>3</b>	<b>System Remediation Plan Milestones</b>			
3.01	Remediation Plan Proposal	This deliverable consists of developing a remediation plan outline and methodology.	100%	- 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.	100%	- No Activity to report
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.	100%	- No Activity to report
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	91-99%	- Reviewed feedback/comments and updated the Initial Budgets and System Remediation Plan (and Program Briefs), and worked on final reviews and finalization for submission.  Note: refer to 1.02, 3.02 & 3.05 which capture the evolution from gap assessments (1.02), to initiative development (3.02); to System Remediation Plan development (3.04); and to the Approval of System Remediation Plan (3.05)
3.05	Approval of System Remediation Plan	Activities to gain P3A and regulatory (PREB) approvals for System Remediation Plan	51-60%	- Reviewed feedback/comments and updated the Initial Budgets and System Remediation Plan (and Program Briefs) and worked on final reviews and finalization for submission. Activities included documentation of process, description of method and association with other deliverables.  - Reviewed, discussed and incorporated comments from P3A, developed petitions and submitted to PREB in late February. Awaiting PREB regulatory process.  Note: refer to 1.02, 3.02 & 3.04 which capture the evolution from gap assessments (1.02), to initiative development (3.02); to System Remediation Plan development (3.04); and to the Approval of System Remediation Plan (3.05)
<b>4</b>	<b>Customer Services</b>			

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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"> <li>- Reviewed facilities for possible consolidation and reviewed regional facilities budget with Facilities Team.</li> <li>- Finalized IT and equipment needs along with facility handover recommendations to begin space and use analysis.</li> <li>- Met with a space planner to begin discussing COVID contingencies at San Juan contact center (CIM).</li> </ul>
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 ServCo. 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.	61-70%	<ul style="list-style-type: none"> <li>- Met with PREPA subject matter experts to better understand current state processes and procedures.</li> <li>- Developed over 75 high priority Customer Experience process maps and 30 procedure documents to support employee training and commencement efforts.</li> <li>- Identified and documented process improvements in preparation for future implementation.</li> <li>- Identified existing PREPA documents and/or subject matter experts to support documentation or remaining processes and procedures.</li> </ul>
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.	71-80%	<ul style="list-style-type: none"> <li>- Worked on the meter reading plan using our findings over the last few months.</li> <li>- Worked on an AMI pilot plan.</li> <li>- Still waiting on process information from PREPA based on our RFIs.</li> </ul>
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.	71-80%	<ul style="list-style-type: none"> <li>- Worked on 2nd draft of the Transition Plan for Customer Experience in all functional areas of Contact Center, Billing Services, Revenue Protection (Collections), Regional Offices, Voice of the Customer Program, Training.</li> <li>- Continued to complete interviews of PREPA employees.</li> <li>- Maintained meetings with True North and reviewed their monthly reports and KPIs for PREPA's performance on payments, estimations, and manual meter reads. This data is being used to identify process improvements and work volumes for workforce structure and size.</li> <li>- Received and assessed J.D. Power Business 2020 customer results. Q1 2021 Residential J.D. Power Survey has been closed, with results available by mid-March. Q1 2021 Business Survey wave is open and ongoing.</li> <li>- Completed weekly meetings with PREPA Customer Billing teams to identify work processes that may require updates in Oracle Customer Care and Billing software that could impact billing and revenue.</li> <li>- Training Updates: Completed 75% of first draft of Customer Experience Essentials instructor led course to support all Customer Experience employees in the application of essential information (including foundational knowledge of electric system and meters, rates and regulations, and LUMA bills).</li> <li>- Created procedural lesson and practice scenario templates to support rapid development of procedural training.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	61-70%	<ul style="list-style-type: none"> <li>- Expanded documentation of key start and shut off processes and procedures.</li> <li>- Identified and documented process improvements in preparation for future implementation.</li> <li>- Documented new collections processes to be implemented post commencement.</li> </ul>
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"> <li>- Reviewed the overall asset management plan to determine how meter asset management will integrate into a development plan for asset management.</li> </ul>
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.	51-60%	<ul style="list-style-type: none"> <li>- Completed the requirements gathering sessions with the selected implementation partner for the cloud-based contact center system and finalized draft of business requirements document.</li> <li>- Selected payment processor vendor approach for commencement. Decision made to continue the use of Oriental Bank payment processing over other vendors for the Mi Cuenta website and contact center system Interactive Voice Response on the contact center technology.</li> <li>- Coordinated interaction between new Mi Cuenta customer portal and cloud-based contact center for routing customer interactions to advisors</li> <li>- Currently assessing the effort required to store and display Customer Bill Statements through new LUMA Mi Cuenta</li> <li>- Began testing the integration of Oracle Customer Care and Billing with the new Oracle Enterprise Business Solution. Began solutioning the requirement for Oracle CC&amp;B to distinguish the different accounts between PREPA and LUMA. LUMA Customer Experience coordinating with LUMA IT and PREPA Customer Service team to create the test scenarios and complete testing; approximately 50% of test scenarios have been completed.</li> <li>- Created multiple contingency plans for the LUMA Bill, Rebrand and/or Redesign and Bill Print, to ensure alignment with the LUMA Mi Cuenta launch including mitigation plan to launch new bill and new self-serve portal post commencement.</li> </ul>
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.	21-30%	No activity to report.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	51-60%	<ul style="list-style-type: none"> <li>- Continued weekly meeting with PREPA Commercial Office Director to understand current work volumes, types, and process to inform future state processes for field execution in Operations.</li> <li>- Focused on documenting the existing PREPA Processes related to creating, editing and cancelling Service Orders and remote disconnect and reconnect orders.</li> <li>- Built the Table of Contents for the Customer Experience and Operations Integration Plan and completed 50% of the content.</li> <li>- Started weekly Operations/Customer Experience meetings specific to service orders for field activities created from Storms and Oracle software. Created a first draft of Service Metrics by work type and documented what information is required from Operations for each Order type.</li> <li>- Focused on mapping current state of service order dispatch and completion. Multiple meetings were held with PREPA Commercial Office Director and PREPA employees. An analysis was completed for multiple service order systems including Theft Orders, Customer Requested Service Orders and PREPA generated orders.</li> </ul>
<b>5</b>	<b>IT</b>			
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.	100%	Completed. No activity to report.
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.	100%	Completed. No activity to report.
5.03	Evaluating IT/OT Applications and Infrastructure	This deliverable includes gathering information and evaluating PREPA's IT/OT applications and infrastructure.	100%	Completed. 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)	91-99%	<ul style="list-style-type: none"> <li>- Continuing to build contributing components for the governance of information security office and Cybersecurity Plan.</li> <li>- The detailed response plan (IT BCP and IT DR (Data Recovery)) is underway with contributing departments and requirements to develop as per critical assets (systems).</li> <li>- Execute on Cybersecurity Operational plans with MSSP (Managed Security Service Provider) and improve readiness for commencement.</li> </ul> <p>(Work on this deliverable is conducted in conjunction with the Handover Checklist items 9.05)</p>
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.	1.0	<ul style="list-style-type: none"> <li>- IT OT Asset Management Plan document complete.</li> <li>- Consolidation of data collection forms is complete based on the information provided by PREPA; LUMA has implemented processes to enable the maintenance of the data collection forms as additional information is discovered and established the set of data collection forms as the master configuration management database (CMDB) in the absence of a tool being available at PREPA</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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%	Completed. No activity to report.
5.07	Commencement Cutover Planning	This deliverable includes activities to prepare for Commencement Cutover during Transition.	51-60%	<ul style="list-style-type: none"> <li>- Initiated review and alignment on current projects with LUMA and PREPA.</li> <li>- Continued vendor engagement including contract requests, license counts, support contact information.</li> <li>- Provided PREPA IT list of pre-commencement contracts that LUMA is requesting PREPA to extend.</li> <li>- Developed Cutover Plan development process including rollup and milestone reporting.</li> <li>- Continued LUMA and PREPA weekly alignment meetings.</li> </ul>
5.08	Training and Communication Plan	This deliverable includes activities to plan and communicate IT/OT Training opportunities to current and future LUMA employees.	71-80%	<ul style="list-style-type: none"> <li>- Completed first IT OT All-Hands Meeting.</li> <li>- Completed 2nd &amp; 3rd IT OT Vendor Registration (contact information for commercial and support inquiries and summaries of contracts).</li> <li>- Approved IT OT Newsletter template from LUMA Communications Team to be used for bi-weekly IT OT All-Hands updates.</li> </ul>
<b>6</b>	<b>Financial Management</b>			
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.	1.0	<p>- Please refer to comments within HOC 6.05. This HOC item is deemed completed with the filing of the Regulatory submission to the PREB.</p> <p>(Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.02 and 6.05)</p>
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).	1.0	<p>- Please refer to comments within HOC 6.05. This HOC item is deemed completed with the filing of the Regulatory submission to the PREB.</p> <p>(Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.02 and 6.05)</p>
6.03	Formalizing/Approach to Changes Control Processes	This deliverable includes the reporting any significant deficiency, material weakness, improvement opportunities and any other matter considered relevant for the FET identified as a result of the review of PREPA's Internal Controls Framework.	91-99%	- Completed list of gaps and opportunities which was presented and discussed with PREPA's key finance managers. Will continue into March, as clarifications on a few items are still being discussed.



ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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 ServCo; design, configure and test LUMA ServCo's financial systems; gain approval of LUMA ServCo's Chart of Accounts; and design and implement processes for finance actuals and reporting.	61-70%	<ul style="list-style-type: none"> <li>- Continued collaboration with PREPA Oracle EBS users and their respective managers in process design, system configuration decisions, and testing strategy/planning; finalized system design for Fixed Assets, Project Accounting, and the Custom Labor Cost Distribution application; prepared Oracle EBS testing scripts and tracking tool.</li> </ul>
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"> <li>- Prepared and supported LUMA's Initial Budgets, SRP and Performance Metrics for reviews and approval for submittal to the PREB.</li> <li>- Continued coordination efforts with Financial Accounting Systems Setup =&gt; EBS &amp; Job Costs (HOC item: 6.04) around budget level of detail and account structure requirements by departments to support operational reporting.</li> <li>- This HOC items is conducted in conjunction with HOC 6.01 and 6.02. With the submission of the regulatory filing to the PREB, HOC 6.01 and 6.02 will be marked as completed and HOC 6.05 will continue through FET to report on the progress of the regulatory filing through the PREB and other Initial Budget initiatives.</li> </ul> <p>(Work on this deliverable was conducted in conjunction with the Handover Checklist items 6.01 and 6.02).</p>
6.06	Establishing Bank Accounts	This deliverable includes establishing all necessary bank accounts for LUMA ServCo and work with PREPA to set up the service bank accounts required for Commencement, as described in the OMA agreement.	61-70%	<ul style="list-style-type: none"> <li>- On going weekly meetings with PREPA treasury to monitor account set-up status.</li> <li>- LUMA signers to be set-up prior to commencement.</li> </ul>
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.	61-70%	<p>Workday Payroll:</p> <ul style="list-style-type: none"> <li>- Payroll and Absence end to end (E2E) testing is in progress; E2E testing of ADP, Fidelity, and CHUBB Integrations are in progress.</li> <li>- Unit testing completed for integrations between Workday, Kronos and EBS.</li> <li>- Absence requirements are changing; anticipating final requirements any day now.</li> </ul> <p>Kronos:</p> <ul style="list-style-type: none"> <li>- Finalized &amp; approved Business Requirements.</li> <li>- Completed System Integrated Testing Plan &amp; Test Scripts.</li> <li>- Conducted Employee Integration Testing.</li> </ul>
6.08	Establishing a Delegation of Authority Matrix and Process	This deliverable establishes a Delegation of Authority Matrix and Process for LUMA ServCo. Delegation of Authority to set Requisition (financial approval) and Purchase Order approval limits in the ERP System.	81-90%	<ul style="list-style-type: none"> <li>- Limits of Authority are currently under review with LUMA Executives.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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%	- Final editing and wrap-up of loose ends will continue into March.
<b>7</b>	<b>FEMA Funds and Federal Funding Procurement Manual</b>			
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.	41-50%	- Continued discussions regarding understanding of planned system integration, chart of accounts, and procurement. - Continued discussions regarding integration and implementation of GrantWise.
7.02	Policies and Procedures	This deliverable includes the development of policies and procedures in line with governance framework.	61-70%	- Continued to provide technical assistance on Federal funding regulations related to internal labor and other finance related federal fund topics. - Discussions continued on GrantWise for integration with LUMA financial system and ultimate deployment. - Drafting continues on the comprehensive Federal Fund Manual. Policies and procedures currently in process relate to costs, property, monitoring, and audits.
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%	- Continued PW Assessments including meeting with PREPA to discuss current status of Category B PWs submitted to FEMA for internal labor and MOU which have been obligated but not yet reimbursed. - Provided federal funding technical assistance the following transition workgroups: Substation, Distribution, Generation, Procurement, Project Controls, Grants Management. - Supported Capital Projects as they establish the Project Work Breakdown Structure (WBS) to ensure alignment with FEMA requirements and with the finance/accounting chart of accounts/cost codes.
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 February
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.	71-80%	<ul style="list-style-type: none"> <li>- Completed the second draft of Federal Fund procurement manual which is currently under review.</li> <li>- Contributed to the development of the Non-Federal Funded Procurement Manual - which is the foundation to the Federal Funded Procurement Manual.</li> <li>- Continued ongoing technical assistance and related to the integration of the federal fund procurement and the non-federal fund procurement manual processes.</li> </ul>
<b>8</b>	<b>Staffing for Front-End Transition Period</b>			
8.01	Draft, Revise and Finalize Operator Employment Requirements	This deliverable consists of determining the minimum employment requirements for LUMA employees by position.	Refer to 8.02	<ul style="list-style-type: none"> <li>- Reporting has been consolidated under 8.02 Recruiting and Staffing.</li> <li>- This specific deliverable has been completed.</li> </ul>
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.	71-80%	<ul style="list-style-type: none"> <li>- Completed 100% of PREPA first round interviews.</li> <li>- Advanced the offer letters with terms of employment.</li> <li>- Commenced first round interviews of external applicants.</li> <li>- Completed Background Check vendor evaluations and selection.</li> <li>- Continued Onboarding Planning concerning safety, compliance, and operational trainings needed, and policies and benefits scope for Onboarding.</li> <li>- Identified needs for the Security Department for the Onboarding process.</li> </ul>
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.	91-99%	<ul style="list-style-type: none"> <li>- Continued to work with each department to coordinate and schedule interview meetings and departments that have identified additional needs.</li> </ul>
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	<ul style="list-style-type: none"> <li>- Reporting has been consolidated under 8.02 Recruiting and Staffing.</li> <li>- This specific deliverable has been completed.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	71-80%	<ul style="list-style-type: none"> <li>- Started Phase 1b testing; tested 182 tests cases to date.</li> <li>- Two payroll tests runs settled and validated.</li> <li>- Continued to work through issues with ADP integrations on tax and garnishments.</li> <li>- Continued work on Leaves of Absence testing.</li> <li>- Continued partnership with Payroll for payroll workstream, EBS and Kronos integrations.</li> <li>- Continued translation process (Spanish translations for job titles, location names, misc. instructional text in Employee Self-Service, etc.).</li> <li>- Continued Workday Operational Readiness Planning.</li> <li>- Successfully completed the first iCIMS integrations run with Workday.</li> </ul>
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.	71-80%	<ul style="list-style-type: none"> <li>- Continued monitoring media messages and delivering summaries to key LUMA employees.</li> <li>- Continued developing materials for press.</li> <li>- Shared draft Communications Plan with Chief Corporate Services Officer for review and feedback.</li> <li>- Kicked off development of customer multimedia communications campaign for LUMA commencement.</li> <li>- Continued planning and meetings for brand roll out, including approving artwork for fleet branding.</li> <li>- Continued developing functionality of mobile app.</li> <li>- Produced local photo assets to incorporate into website and other communications outputs.</li> <li>- Rolled out revamped social media strategy.</li> </ul>
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.	71-80%	<ul style="list-style-type: none"> <li>- Completed 100% of the Non-Technical training list and prioritization; Met with vendors to identify cost impacts and availability of curriculums and content needed.</li> <li>- Continued working on Safety and Operation training list and prioritization.</li> <li>- Continued developing training content in all departments.</li> <li>- Continued translation of training materials such as job aids and videos specific to Workday into Spanish.</li> </ul> <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.	100%	<ul style="list-style-type: none"> <li>- Retirement Plan has been designed and completed.</li> </ul>
8.09	Occupational Health and Wellness	This deliverable involves implementing a confidential Employee Assistance Program through our medical provider.	91-99%	<ul style="list-style-type: none"> <li>- Working to finalize the Occupational Health and Wellness Plan document.</li> <li>- Received proposals from three Drug and Alcohol test providers, analyzed and evaluated costs, capabilities, and proposed implementation plans. Working to finalize evaluation.</li> </ul>

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	81-90%	- Completed labor compliance review of 31 human resources policies and procedures. Remaining policies under legal review.
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.	51-60%	- Continued development of employee communication materials, including Total Rewards for Onboarding, for current and future LUMA hires. - Continued refinement of LUMA Employee messaging based on feedback from PREPA employees. - Continue to work on communication strategies to help PREPA employees understand this new concept of the 401K and continue to work on validating the compensation scales with Hiring Managers and leadership team.  (Work on this deliverable is conducted in conjunction with the Handover Checklist item 8.02)
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.	71-80%	- Negotiated terms of contracts with Community Investment partners. - Developed plans for Community Investment roll out and announcement.
<b>9</b>	<b>Additional Front-End Transition Period Activities</b>			
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.	91-99%	- Completed design of Shared Services model which has been submitted to P3A. There are ongoing discussions to reconcile the Shared Services model with the draft SSA with legal. - Completed design of Shared Services model and budget has also been submitted to PREPA and planning future meetings to incorporate PREPA into implementation planning.
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.	81-90%	- Under LUMA review with iterative update of key sections. (LEGAL REFERENCE FOR HOURS) // PLANING TEAM
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.	91-99%	- Draft completed, currently circulating with internal stakeholder for review. - Continued work on final site report assessments (~80% complete). - Forms to systematically assess physical security on transmission and substation substations completed.

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	1.0	- Data Security Plan is complete - Standards and controls completed  (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	51-60%	- Review, discussed and incorporated comments from P3A, developed petitions and submitted to PREB in late February. Awaiting PREB regulatory process.
<b>10</b>	<b>Asset Acquisition (Supply Chain)</b>			
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.	81-90%	- Continuing to revise processes per feedback from Legal as a part of the NFF Procurement Manual review.
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.	71-80%	- Obtained historical/sensitive information for each lease. The information is required to support the communications strategy which is an input into lease optimization strategy. - Obtained site plans, architectural designs, and furniture drawings. Utilizing the information obtained to map out maximum occupancy as per organizational structures  (Work on this deliverable is conducted in conjunction with the Handover Checklist items 2.0309)
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.	61-70%	- Continued to review existing PREPA contracts with LUMA departments. Starting with critical priorities and moving through the full list. - Have now received approximately 95% of System Contracts from PREPA. Also received a listing of open and active contracts which enabled us to remove more than 300 ended or expired contracts from our list.
<b>11</b>	<b>Back-End Transition Plan</b>			
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.
<b>12</b>	<b>Front-End Transition Plan (Additional Requirements)</b>			

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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 ServCo, 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.	31-40%	- Continued to identify and review sources for submission data. Fiduciary Liability application process has begun as well as El Fondo coverage for ServCo. Most of the work for this deliverable is scheduled for the last months of Front-End Transition. - Coverage will be finalized in the last stage of FET.
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.	100%	- Revised Performance Metrics Baselines. - Developed Performance Metrics Baselines Reply to Stakeholder Comments. - Reviewed, discussed and incorporated comments from P3A on Part II (Targets), developed petitions and submitted to PREB. - Responded to Resolutions and Orders from PREB and attended Technical Conferences regarding Part I (Metrics and Baselines).
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.	91-99%	- Back End Transition Plan under review by Senior Leadership.
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).
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 consolidated to 1.01 Government Approvals

ID	Full description	Deliverable Description	Status % Complete	Summary of key work performed in February
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.	61-70%	<p>Continued to work on and provide legal support for various condition precedent activities within LUMA including the following:</p> <ul style="list-style-type: none"> <li>- Revised the Shared Services Agreement and discussed proposed changes and approach with P3A and its advisors.</li> <li>- Worked with Regulatory Counsel and LUMA Regulatory Team to revise the Key Regulatory Deliverables including the Initial Budgets, and Related Terms of Service, System Remediation Plan (including all Program Briefs), Performance Metrics, and System Operation Principles to address and incorporate comments of the P3A and its advisors on same. Prepared Motions and filed the Initial Budgets and Related Terms of Service, System Remediation Plan (including all Program Briefs), Performance Metrics, and System Operation Principles with the PREB and requested its approval of same.</li> <li>- Worked with Nixon Peabody to arrange for supporting report it needs to issue Supplemental Agreement Tax Opinion.</li> <li>- Worked with counsel for FOMB and AAFAF on the timing and substance of the Motion requesting Administrative Expense Treatment for amounts to be to LUMA during the Interim Period.</li> <li>- Worked with counsel for FOMB on Term Sheet for the FOMB Protocol Agreement.</li> <li>- Reviewed Reliance Letter in connection with the Base Environmental Study.</li> </ul>
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.