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

IN RE: REVIEW OF PUERTO RICO ELECTRIC SYSTEM REMEDIATION PLAN	**CASE NO. NEPR-MI-2020-0019** **SUBJECT:** Motion Submitting Corrected Attachment 3 to Responses to Requests for Information on System Remediation Plan ("SRP").

MOTION SUBMITTING CORRECTED ATTACHMENT 3 TO LUMA'S RESPONSES TO SRP REQUESTS FOR INFORMATION

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo"), (jointly referred to as "LUMA"), and respectfully state and request the following:

1. On April 16, 2021, LUMA filed before this Honorable Puerto Rico Energy Bureau ("Energy Bureau") its Responses to the Requests for Information issued by this Energy Bureau in the Resolution and Order on "Completeness" of LUMA's System Remediation Plan ("SRP Responses to Requests for Information"). *See* Exhibit 1 to Motion in Compliance with Resolution and Order of April 6, 2021 and Submitting Responses to Requests for Information.

2. The SRP Responses to Requests for Information include several documents in response and several attachments thereof. The response to SRP request for information number 12 includes an Attachment 3 which is a table titled "SRP Program Briefs-OMA Provisions, Energy Laws, and Public Policies, and Program Briefs." *See* RFI-LUMA-20-0019-21046-PREB-012 Attachment 3.

3. At pages 15, 16, 23 through 25, and 30, the table included as Attachment 3 to LUMA's response to SRP request for information number 12, has an involuntary formatting

mistake that misplaced contents of the third and fourth comments. LUMA hereby respectfully submits a corrected Attachment 3 to LUMA's response to request for information number 12, that amends the aforementioned formatting issue.

4. It is respectfully submitted that no revisions were made to the substantive contents of Attachment 3 to LUMA's response to request for information number 12, nor additions. This Attachment has only been revised to correct the format of the third and fourth columns of the table at pages 15, 16, 23 through 25, and 30.

5. This Motion is filed in good faith to enable the Energy Bureau to consider fully, LUMA's SRP Responses to Requests for Information.

WHEREFORE, LUMA respectfully requests that the Bureau **take notice** of the aforementioned and **accept** the corrected Attachment 3 to LUMA's response to the request for information number 12, RFI-LUMA-20-0019-21046-PREB-012 Attachment 3, that is being submitted with this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of April 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.

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SRP Program Briefs- OMA Provisions, Energy Laws and Public Policies and Program Benefits

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs
Customer Service Portfolio			
Distribution Streetlighting This program deals with upgrading and replacing distribution streetlights that are a physical safety hazard and are scheduled for repair or replacement based on their criticality. Along with increasing the number of distribution streetlights in service, this process will also include LED replacements and GIS data entry of all streetlights.	-Public lighting to be maintained and improved and operations and maintenance of these lights, including installation of LED lighting, to be in accordance with Prudent Utility Practice and Applicable Law. Annex I, Sections I(A) and II(F).	Act 17: -An initial objective of the energy public policy is to have all existing high-pressure sodium (HPS) lamps replaced with LEDs or renewable lights by 2030. *See* Section 1.6(12). **- It is a public policy that the Government of Puerto Rico shall achieve a swift conversion of all public lighting to light emitting diodes (LEDs) or renewable energy in order to reduce the general cost of illumination at a municipal and state level. *See* Section 1.5(7)(b).** **-It is a public policy to oversee the implementation of strategies geared toward achieving efficiency in the generation, transmission, and distribution of electric power so as to guarantee the availability and supply thereof at an affordable, just, and reasonable cost. *See* Section 1.5(2)(b).** **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** Act 57: **-It is a public policy that there be the implementation of strategies geared toward achieving efficiency in the generation, transmission, and distribution of electric power shall be sought in order to guarantee**	• Prioritize safety (implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; deliver electricity at reasonable prices) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure) • Sustainable energy transformation (Modernizing the grid)

[1] This column lists requirements under the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020, by and among the Puerto Rico Electric Power Authority ("PREPA" or "Owner"), the Puerto Rico Public-Private Partnerships Authority and LUMA Energy, LLC and LUMA Energy, LLC (the "OMA"), related to the Program. Citations are to the OMA.

[2] This column lists legal provisions under energy laws which may be related to the program, which the program advances or with which the program is consistent or aligned. Public policies are highlighted in bold and referenced in pertinent part. The list of laws is not meant to be exhaustive. Other laws and regulations may apply to the specific activities to be undertaken pursuant to each program, which will be complied with, as applicable. Act 17-2019, as amended, is referred to as "Act 17", Act 57-2014, as amended, is referred to as "Act 57"; and Act 83 of May 2, 1941, as amended, is referred to as Act 83. References to laws are not direct quotations.

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs 1
		the availability and supply thereof at an affordable, just, and reasonable cost. *See* Section 1.2(d).	
Billing Accuracy & Back Office This program includes updates to bill print and delivery and other back office systems to ensure LUMA has the ability to continue to produce customer invoices. Current technology, machines and systems are outdated, creating a financial liability in delayed revenue of ~$12.5M for each day invoices are not produced. This upgrade includes acquisition of new hardware and software to support billing and customer contracts, along with removing redundant bill printing and enveloping equipment. Additionally, the program supports back office processing of service order paperwork and mobilizes resources to address backlogs of estimated and unbilled accounts. The program also implements a customer experience metrics dashboard and agent routing technology for billing services to reduce resolution time and increase customer satisfaction.	-Implement and optimize billing. Annex I, Section I(A)(4). -Monitor industry advances related to O&M, customer care and related services, etc. Annex I, Section (III). -Conduct timely collections of customer remittances and non-product revenue through lockbox operations, customer centers and other sources and transfer of funds as required for operations and other necessary payments. Annex I, Section VI (E). -Evaluate opportunities for outsourcing <u>any</u> specific activities that will provide greater efficiencies and value to customers and T&D system operations, subject to budget and regulatory constraints. Annex I, Section (I)(J). -Maintain and improve IT to satisfy business needs and requirements of OMA. Annex I, Section I(B)(9). -Conduct design and engineering for customer contact and needs assessment. Annex I, Section I(D)(1). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section (II)(D). -Conduct IT systems maintenance support and improvements in accordance with strategic goals, cybersecurity requirements, business continuity plan. Annex I, Section I (II)(E). -Have a continuous improvement program to enhance performance, efficiency and cost-effectiveness. (III) - Have a customer online and mobile website, including mobile applications for Iphone and Android, other electronic media, inbound and outbound customer communications systems. Annex I, Section IV(E)(2).	Act 17: -Electric Service companies must have an website to pay bills, examine consumption history, verify use patterns, obtain information about bills and other data to verify bill, examine data in real time, obtain status of internal matters and access a platform to request information. *See* Section 1.10(j). **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, a transparent and easy to understand bill, and a fast service response. *See* Section 1.5(10)(a).** **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** **Act 57:** **-It is a public policy that every consumer shall have the right to receive a reliable, stable, and excellent electric power service. *See* Section 1.2(l).** Act 83: -PREPA to conduct its business in a responsible and efficient manner with accurate fiscal and operational practices (*See* Section 6(c)) and to maintain a website with required information and access to a platform by clients to request information. *See* Section 6(k). -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Improve customer satisfaction (Deliver positive customer experience; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (improve resilience of vulnerable infrastructure) • Sustainable energy transformation (enable the digital transformation)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs 1
Standardized Metering & Meter Shop Setup This program is targeted at establishing a location for standardized meter testing for LUMA and the provision of appropriate internal and external meter testing equipment. Enhanced procedures are also included, along with operational support for the new facility and equipment.	-Repair, replacements, upgrades and maintenance of meters, transmitters and appurtenant wiring, computer system and software to ensure proper operation and accurate reporting. -Maintaining proper operation and accurate reporting of new and existing meters, meter reading systems and components. -Repairing and maintaining new and existing meters to resume proper operations as soon as practicable but no later than the requirements of Performance Metrics. -Ensure new meters are within levels for accuracy. -Have a plan for inspection of commercial and industrial meters for proper operation and prevent tampering or bypassing and maintain records. Annex I, Section IX(G) and (H).	Act 17: **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable,. *See* Section 1.5(10)(a).** Act 57: - Electric Service Companies to adopt reasonable and fair norms and practices to guarantee the precision of the equipment they use to provide service. *See* Section 6.28(b). -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Improve customer satisfaction (increase service reliability; deliver electricity at reasonable prices) • Operational excellence (enable employees to execute operations systematically)
Modernize Customer Service Technology The Modernize Customer Service Technology program is primarily focused on remediating the telephony technology through the development and implementation of a new cloud-based contact center platform. Contact center software allows for the management of a high volume of inbound and outbound customer communications across a range of channels. Modernizing contact center procedures will mitigate LUMA's risk of customers being unable to report emergency situations. The program will create real time dashboards and reporting to cover key performance indicators across all of Customer Service, including the contact center, district offices and billing services.	-Maintaining customer contact through call centers with toll free service numbers, customer offices, authorized payment centers; customer contact to include maintaining a phone line for outage calls, until there is an alternative communication system or technology that makes this information otherwise available. Annex I, Sections IV(E)(1).	Act 17: **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable and a fast service response. *See* Section 1.5(10)(a).** **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9) (e).** Act 57: -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective safety practices • Improve customer satisfaction (Deliver positive customer experience; increase service reliability)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs 1
Streetlight Billing This program is an audit of streetlights and associated billing. PREPA has approximately 500,000 streetlights which should be audited on a regular cycle to be determined based on asset management procedures. This program will require LUMA to complete a physical audit of the streetlights, assigning each with a unique indicator/asset tag. Once this process is complete, updates will be made in the Customer Care and Billing (CC&B) system to ensure customers are being billed accurately for their lights. The program also includes communication with customers on corrections to the street lighting system.	-Responsible for customer communications with municipalities. Annex I, Section IV(B). -Performance of all accounting and reporting functions including CILT, subsidies and public lighting reporting functions, provision of information to Owner and Administrator in connection with Owner's contesting of CILT-related assessments. Annex I, Section VI(B)(6).	Act 17: **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, a transparent and easy to understand bill, and a fast service response. *See* Section 1.5(10)(a).** Act 57: **- It shall be public policy that processing of billing or services disputes should be fair and diligent. *See* Section 1.2 (p).** - Transparent billing for each type of client is required. 2.9. -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a). Act 83: -Billing of municipalities to be conducted in accordance with section 22 of Act 83 (CILT).	• Prioritize safety (implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business;)
Distribution Portfolio			
Distribution Line Rebuild This program replaces damaged or ineffective overhead and underground distribution lines, including the following initiatives -Perform distribution line upgrades to improve reliability and resiliency -Restore out of service circuits as deemed necessary -Complete unfinished circuit construction presently abandoned as deemed necessary -Perform circuit voltage conversions to improve distribution capacity -Improve voltage profile to customers and reduce distribution energy line losses -Build new distribution line extensions to connect new customers -Install underground cable and / or tree wiring to improve service reliability and resiliency to critical customers	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section II (D). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the	Act 17:-Principles governing the electric system include that electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to design infrastructure so it is robust and resistant to weather events adopting/using codes that comply with current norms recognized at a National level, as well as safety requirements in distribution poles; maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service; and put underground distribution in place after corresponding analysis and to the greatest extent possible in order to increase resiliency, rehabilitation and repopulation and with special emphasis on critical load facilities. *See* Section 1.5 (9)(b),(e) and (h).**	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (increase service reliability) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure;) • Sustainable energy transformation (Modernizing the grid)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs
	Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C). -Perform normal and ordinary maintenance of all property, keep the system in operational condition and repair and in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, materials, supplies, equipment, spare parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I, Section VIII(A). -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1).	-PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in Section 1.15 of Act 17, including: maintaining standardized transmission and distribution voltage compatible with those in the states of the United States; evaluating the benefits of substituting the transmission and distribution lines in the in urban town centers and critical services installations; and making the equipment and design uniform with the parameters of USDA Rural Utilities Service when feasible and appropriate, to help in the replacement in regular and emergency situations, among other things. *See* Section 1.15. (e), (g) and (n). Act 57: **-It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	
Distribution Pole and Conductor Repair This program focuses on minimizing the safety hazard caused by distribution poles and conductors that need to be repaired or replaced. Major repairs and replacement will be based on the results of an inspection of the distribution system and an analysis by engineers to schedule the repair or replacement based on the criticality of the pole. Following this process, safety hazard and priority poles will be replaced, along with damaged conductor and hardware.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C). -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1).	Under Act 17: -Principles governing electric system include that electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in Section 1.15 of Act 17, including replacement of temporary transmission towers by single poles and poles with material and design resistant to 150 mph winds and to prevent overload; replacement and maintenance	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (Increase service reliability) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs
		of transmission infrastructure anchoring systems to maintain resiliency and implementation of programs to mitigate corrosion in grid infrastructure; maintain standardization and compatibility with transmission and distribution voltage in the United States; evaluate the benefits of substituting transmission and distribution in downtown urban areas and critical installations, evaluate feasibility of relocating transmission lines for easy and quick access for repair and maintenance, among other things (all as applicable to the circumstances). *See* Section 1.15. Act 57: **It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	
Distribution Line Inspection This program is targeted at the inspection, testing and studying of distribution lines, along with required spot repairs and replacements. Distribution line inspections will first be prioritized by worst performing feeder and highest criticality with the initial assessment focusing on the identification of SRP items. Because of the magnitude of the work, the SRP portion of the inspection program is anticipated to take four years to complete with the remainder of inspections to be completed after the SRP period. Its aim is to help to restore the system and improve reliability and resiliency in line with current codes and standards, including, but not limited to: -Inspecting and treating poles -Performing ground rod inspections and minor repairs / replacements -Inspecting and replacing anchors and guys -Inspecting conductor condition -Performing line clearance checks to ensure that distribution assets meet live line clearance requirements under the applicable codes and standards -Inspection of streetlight heads and poles -Identification of third-party attachments	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section II (D). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii) **-It is a public policy to design infrastructure so it is robust and resistant to weather events adopting/using codes that comply with current norms recognized at a National level, as well as safety requirements in distribution poles; maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service; and put underground distribution in place after corresponding analysis and to the greatest extent possible in order to increase resiliency, rehabilitation and repopulation and with special emphasis on critical load facilities. *See* Section 1.5 (9)(b),(e) and (h).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (increase service reliability) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs 1
-Inspection of third-party attachments for applicable code violations as it pertains to the electrical system The identified major repairs and replacements will then be undertaken by a separate program.	with Contract Standards. Annex I, Section VIII(C) -Perform normal and ordinary maintenance of all property, keep the system in operational condition and repair and in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, materials, supplies, equipment, spare parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I, Section VIII(A) -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1)	in Section 1.15 of Act 17, including: maintaining standardized transmission and distribution voltage compatible with those in the states of the United States; evaluating the benefits of substituting the transmission and distribution lines in the in urban town centers and critical services installations; and making the equipment and design uniform with the parameters of USDA Rural Utilities Service when feasible and appropriate, to help in the replacement in regular and emergency situations, among other things. *See* Section 1.15. (e), (g) and (n). Act 57: **It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	
Transmission Portfolio			
IT OT Telecom Systems & Network This program includes IT and OT telecom investments to improve and revamp PREPA's mobile radio system, phone exchange and telephone systems and fiber optic and microwave data radio systems. These systems are used to carry all PREPA IT and OT data. Capability enhancements will include improved first responder and emergency response communication, greater resilience of the internal telecommunications network, an enhanced microfiber network and network control center to improve centralized monitoring and control over facilities and IT traffic.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section II (D). Maintain and improve IT to satisfy business needs and requirements of OMA. Annex I, Section I(B)(9). Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A).	Act 17: -Principles governing electric system include that electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9) (e).** Act 57: **- It is a public policy that the safety and reliability of the electricity infrastructure shall be guaranteed by integrating clean and efficient energy and using**	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation)

Programs	Applicable OMA Provisions[1]	Energy Laws, including Public Policies, Among Others and In Pertinent Part[2]	Program Benefits Identified in Section 2.5 of the Program Briefs[1]
		modern technological tools that promote economic and efficient operations. *See* Section 1.2(e). **-It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	
Transmission Line Rebuild This program includes numerous 230kV, 115kV, and 38kV projects to harden and upgrade the transmission system. This includes rebuilding towers along with reinforcing and replacing anchors and guys as required over the course of the upgrade process. This program also incorporates an investigation to mitigate corrosion and restore line design capacity. In addition to the overhead transmission line upgrade work, this program includes the 115kV underground cable replacement in the San Juan area.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section II (D). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C) -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1)	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)((e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in 1.15 of Act 17, including replacement of temporary transmission towers by single poles and poles with material and design resistant to 150 mph winds and to prevent overload; replacement and maintenance of transmission infrastructure anchoring systems to maintain resiliency and implementation of programs to mitigate corrosion in grid infrastructure, among other things. *See* Section 1.15. Act 57: **It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (increase service reliability) • Operational excellence (enable employees to execute operations systematically) • System rebuild and resilience (restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

Transmission Priority Pole Replacements This program is to replace damaged overhead transmission poles and towers, along with associated hardware and conductors. Repairs under this program will be made based on results of an inspection conducted under a separate program. Major repairs and replacement will be based upon the results of an inspection of the transmission system and an analysis by engineers to schedule the repair or replacement based on the criticality of the pole or structure. Following this process, safety / hazard and priority poles and structures will be replaced, along with damaged conductor and hardware. This program is to replace damaged overhead transmission poles and towers, along with associated hardware and conductors. Repairs under this program will be made based on results of an inspection conducted under a separate program. Major repairs and replacement will be based upon the results of an inspection of the transmission system and an analysis by engineers to schedule the repair or replacement based on the criticality of the pole or structure. Following this process, safety / hazard and priority poles and structures will be replaced, along with damaged conductor and hardware.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C) -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1)	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in Section 1.15, including replacement of temporary transmission towers by single poles and poles with material and design resistant to 150 mph winds and to prevent overload; replacement and maintenance of transmission infrastructure anchoring systems to maintain resiliency and implementation of programs to mitigate corrosion in grid infrastructure; maintain standardization and compatibility with transmission and distribution voltage in the United States; evaluate the benefits of substituting transmission and distribution in downtown urban areas and critical installations, evaluate feasibility of relocating transmission lines for easy and quick access for repair and maintenance, among other things (all as applicable to the circumstances). *See* Section 1.15. Act 57: **It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	1 • Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (increase service reliability) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

Inspection of Transmission Lines This program includes the inspection, data collection, testing of the Transmission Lines. Required repairs and replacements will be identified in order to restore the system and improve reliability and resiliency in line with current codes and standards. Inspections will include, but are not limited to, poles, towers and structures, ground rods, anchors and guys, conductor condition and line clearance checks. During this process, the program will also incorporate minor repairs, but major repairs will be undertaken by a separate program.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C) -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1).	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in law, including reinforcing substation assets, including transformers, circuit interrupters, switch gear, and equipment control, such as relays and communication equipment, among other things. *See* Section 1.15. Act 57: **-It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (increase service reliability) • Operational excellence (Enable systematic management of business; pursue project delivery excellence) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation)
Substations Portfolio			
Transmission Substation Rebuilds This program covers required inspection, repair and rebuilding of damaged substations. This includes upgrades to the latest codes, industry standards and practices to improve long term reliability. The program also includes installation of gas insulated switchgear, and replacement of electromechanical and electronic relays, along with repairs and rebuilding of transmission and distribution substations impacted by flooding.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in law, including reinforcing substation assets, including transformers, circuit interrupters, switch gear, and equipment control, such as relays and communication equipment, among other things. *See* Section 1.15.	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Increase service reliability) • Operational excellence (Enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

	with Contract Standards. Annex I, Section VIII(C). -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1)	Act 57: **It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2 (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	1
Distribution Substation Rebuilds This program focuses on improvements to distribution substations as a means to strengthen the distribution grid. This includes hardening and modernizing distribution substations, upgrades to the latest codes, industry standards and practices and the replacement of electromechanical and electronic relays.	-Be responsible for T&D service and related activities for safe and reliable operation and maintenance of system. Annex I, Section I(A). -Determine, acquire deploy and maintain tools, equipment, Information Systems necessary to perform all O&M services. Annex I, Section II (D). -Manage and maintain all assets in accordance with Contract Standards. Annex I, Section II(A). -Maintain inventory and maintain and document an inventory control program, comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C). -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section I(B)(1).	Act 17: -Principles governing electric system include electric service must comply with technical requirements and reliability and quality standards. *See* Section 1.4 (ii). **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** -PREPA or the T&D contractor will conduct improvements to the Electric System so that it is robust, resilient and stable, in accordance with the modernization and reconstruction priorities established in the law, including reinforcing substation assets, including transformers, circuit interrupters, switch gear, and equipment control, such as relays and communication equipment, among other things. *See* Section 1.15. Act 57: **-It is a public policy that the electric infrastructure will be maintained in optimal conditions to ensure reliability and security of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Increase service reliability) • Operational excellence (Enable systematic management of the business; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)
Transmission Substation Security This program will focus on a variety of security concerns at transmission substations. The program will replace and add new security technology and hardware to deter, detect and delay security incidents (e.g., intrusion, theft, damage, employee and public safety). Security concerns addressed by this program include fencing and gates including locking devices, lighting, signage, perimeter cleanup and window bars.	-Develop and maintain a physical security program in accordance with Prudent Utility Practice and applicable laws and regulations. Annex I, Section VIII(C)(7). -Develop a Physical Security Plan for the T&D System. Section and implement it. This plan must guard against physical damage to the T&D System caused by trespass, theft, negligence,	Act 17: **-It is a public policy that the energy infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety. *See* Section 1.5(9)(e).** **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable. *See* Section 1.5(10)(a).**	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Operational excellence (Enable systematic management of the business; enable employees to execute operations systematically)

	vandalism, malicious mischief or cyber-attacks. Sections 4.2(h) and 5.7(c). -Take all reasonable precautions for the health and safety of, and provide all reasonable protection to prevent physical damage, bodily injury or loss as a result of the operation of the T&D System, to the public, materials and equipment used in the O&M Services and other property constituting part of the T&D System. Section 5.7(a). -As part of its asset management and maintenance services, managing and maintaining T&D System security to protect it from vandalism, terrorism or other acts. Annex I, Section II(A)(6).	Act 57: **-It is a public policy for the electricity infrastructure to be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)
Compliance and Studies This program consists of three major workstreams: -*Distribution Studies* focused on eliminating major cascading outages caused by lack of proper coordination of protective devices and implementing new procedures and standards to ensure the distribution system complies with regulations and Prudent Utility Practice. -A group of different projects to ensure *Distribution Substation Grounding Compliance* to IEEE Std 80-IEEE Guide for Safety in AC Substation Grounding and National Electrical Safety Code (NESC). This includes safety and environmental projects including grounding, animal contact mitigation and civil site upgrades (including insulating gravel additions). -Studies, procedures and standards for *Substations and Transmission Compliance* focused on: identify issues with current infrastructure, developing and implementing new procedures and standards to ensure that transmission lines and substations both comply with codes and regulations and can effectively and safely perform their requirements, field implementation of grounding compliance requirements to ensure the transmission and distribution substations meet proper grounding requirements for safety purposes, in accordance with IEEE Std 80-IEEE Guide for Safety in AC Substation Grounding and NESC.	-Provide maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, paragraph VIII(C). -Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, paragraph I(B)(1).	Act 17: **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy to design the infrastructure of the Electrical System to be more robust and resistant to weather events and other disasters, so as to apply and adopt design codes that meet the National standards in effect, as well as security requirements for the utility poles that carry power distribution lines and telecommunication lines, among others things. *See* Section 1.5(9)(b).** Act 57: **-It is a public policy for the electricity infrastructure to be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Increase service reliability) • Operational excellence (Enable systematic management of the business; enable employees to execute operations systematically) • System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)
Physical Security for Distribution Facilities This program is targeted at the physical security of distribution facilities by replacing and repairing gates and fencing around substations. It also addresses provision of locks for distribution switches and pad mounted transformers in the field and meter locks at customer metering points.	-Establish and prioritize workplace safety initiatives to bring the T&D System up to Prudent Utility Practices by systematically evaluating all T&D System sites to address immediately safety issues, including grounding and tripping hazards and lighting. Annex I, Section VIII(C)(1). -Take reasonable precautions for the health and safety of all persons working in the system to	Act 17: **- It is a public policy that the infrastructure be designed to be robust and resistant to weather events adopting or using codes that comply with current norms recognized at a national level and safety requirements in distribution poles, and that it be maintained in optimal conditions to ensure**	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver electricity at reasonable prices) • System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

	prevent damage, injury or loss to the system or its property. Annex I, Section VIII(C)(2). -Establishing reasonable safeguards for health and safety protection, including fencing, posting danger signs and other warnings against hazards and promulgating safety regulations. Annex I, Section VIII(C)(3).	**reliability, resilience and safety, among other things. *See* Section 1.5(9)(b) and (e).** Act 57: **-It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2(f).**	1
Transmission Substation T&G Demarcation This program focuses on the demarcation requirements for transmission and generation (T&G) assets. The demarcation between PREPA's generation assets and the T&D System is required under the OMA, specifically the Scope of Services as set forth in Annex I. The demarcation must include high accuracy metering[1] to accurately measure power generation into the network and facilitate communication with the system operator. The accurate measurement will provide transparency of total net power generation and energy losses to the network. The demarcation must also be defined in a non-complicated manner to provide LUMA and GenCo operators sufficient clarity regarding the separation of assets to prevent mis-operation, and subsequent damage to equipment and / or system.	-Be responsible for the development of necessary interconnection agreements, interconnection demarcation points, and the work plan to delineate generator interconnection. Annex I, Section II(G).	Act 17: **-It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety, among other things. *See* Section 1.5(9)(e).** **-It is a public policy to promote transparency and citizen participation in every process related to electric power service in Puerto Rico. *See* Section 1.5(10)(c).** Act 57: **-It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (f).**	• Improve customer satisfaction (Increase service reliability) • System rebuild and resilience (Improve resilience of vulnerable infrastructure)
Control Center and Buildings Portfolio			
Facilities Development & Implementation This program is focused on the development, implementation, and maintenance of several different areas over*see*n by the Real Estate, Facility Services and Architectural divisions, including: -Construction required to remediate facilities and real property (e.g., warehouses, mechanic shops, etc.) damaged by natural disasters -Implementation of a facility capital improvement program -Implementation of an asset management system to support facility maintenance and the preventative maintenance program -Deployment of robust security devices and systems -Development and implementation of a tenant services program -Development and implementation of safety training programs for Facilities employees -Planning and construction to delineate space between LUMA and the GenCo	-Manage and maintain all assets of the T&D System in accordance with Contract Standards. Annex I, Section II(A). -Manage and perform construction improvements Annex I, Section I(A)(2). -Maintain, improve and develop culture of safety. Annex I, Section I(B)(1). -Provide physical operations and maintenance. Annex I, Section I(B)(3). -Manage effectively environmental, health and safety program. Annex I, Section I(D)(3). -Comply with environmental requirements. Annex I, Section I(D)(3). -Develop and maintain a physical security program in accordance with Contract Standards. Annex I, Section VIII(C)(7). -Maintain safety and security. Annex I, Section VIII(C).	Act 17: **-To maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, . *See* Section 1.5(10)(a).** Act 57: **- It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (e).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; improve resilience of vulnerable infrastructure) • Sustainable energy transformation (enable the sustainable energy transformation) • Other (Environmental)

	-Establish and prioritize workplace safety initiatives to bring system up to Prudent Utility Practices, by systematically evaluating all T&D System sites to address immediately safety issues, including grounding, tripping hazards and lighting. Annex I, Section VIII(D)(1). -Establish reasonable safeguards for health and safety and protection, including fencing, posting danger signs and other warnings against hazards and promulgating safety regulations. Annex I, Section VIII(C)(2). -Designate qualified and responsible employees for supervision of T&D health and safety, prevention of fires and accidents and coordination of activities with federal and local officials. Annex I, Section VIII(C)(5).		1
Critical Energy Management System Upgrades This program will replace an obsolete and unsupported EMS and add relevant technology to operate the electric system safely and reliably. This program will also implement an Advanced Distribution Management System (ADMS). The EMS is a computer-based system that is used by operators to monitor, control and optimize the performance on the generation, transmission and distribution system.	-During Emergency Operating Conditions, the Operator shall implement the Emergency Response Plan per established protocols. After Emergency Operating Conditions have passed, the Operator shall conduct post-event reviews with stakeholders, gather and analyze data from the Energy Management System to determine appropriateness of actions taken during the Emergency Event, and communicate and implement lessons learned. Annex I, Schedule 1.	Act 17: **-It is a public policy to provide incentives for grid modernization incorporating technology as appropriate to attain the transformation goals without incurring excessive costs. *See* Section 1.5(9)(g).** Act 57: **-It is a public policy that the safety and reliability of the electricity infrastructure shall be guaranteed by integrating clean and efficient energy and <u>using modern technological tools that promote economic and efficient operations</u>. *See* Section 1.2(e).**	• Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation)
Control Center Construction & Refurbishment This program is targeted at construction or refurbishment of buildings to house the main and back-up control centers and all ancillary support services. Since the current control centers have fallen into disrepair, this program will rebuild or relocate them, along with establishing a designated backup control center. At the same time, the program will centralize more control center activities.	Annex I of the OMA requires Operator serve the role of T&D System operator including managing control center operations, including generation scheduling and economic/reliable T&D System dispatch.	Act 17: **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** Act 57:	• Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation)

		- **It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (e).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	1
Critical System Operation Strategy & Processes This program will develop all the procedures and strategies necessary to operate the electrical system reliably and efficiently. This includes procedures and strategies associated with managing blackstarts, load shedding, outage management, transmission lines, substations, distribution and deployment of the Outage Management System. Procedures developed will be consistent with the System Operation Principles including the implementation of Estimated Times of Restoration for customers.	Develop a plan to enhance [critical system operation strategy and processes] that connects to customer service interface to keep customers apprised of system status and service orders in real time. Annex I..	Act 17: -Electric service companies to maintain a website free of cost, to: (i) pay bills and examine usage and billing information; (ii) examine real time data; (iii) examine status of legislated changes; and (iv) request information/documents. *See* Section 1.10(j). -Electric service companies to notify customers at least 48 hours prior to planned service interruptions through website, social media, etc. (*See* Section 1.10(k).) **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** Act 57: **- It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (e).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a). Act 83: -PREPA to maintain a website free of cost, to pay bills and examine usage and billing information and information about the infrastructure, among other information. *See* Section 6(k). -PREPA to notify customers at least 48 hours prior to planned service interruptions through website, social media, etc. (see Section 6(l).)	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (increase service reliability) • Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (improve resilience of vulnerable infrastructure)

Critical Energy Management & Load Generation Balancing This program will develop capabilities related to energy management and load / generation balancing. This includes development of strategies and mechanisms for energy balancing and the establishment and implementation of a strategy for operating reserves. Additionally, the program will address technology needs to efficiently manage renewable energy, battery storage and demand response programs, along with defining the role of microgrids within the electrical system as required by the IRP.	The OMA requires the Operator promote, administer, plan, develop and implement energy efficiencies, demand response, load management and renewable energy programs and policies as required under Applicable Law, regulation or IRP. Annex I, Section I (F).	Act 17: **- It is a public policy the implementation of strategies to achieve efficiency in generation and T&D so as to ensure availability and supply at affordable, just and reasonable cost. *See* Section 1.5(2)(b).** **- It is a public policy to maximize use of available resources and empower consumer to be part of energy resources through energy efficiency, demand response, distributed generation, among others. *See* Section 1.5(2)(e).** **-It is a public policy that incentives be provided for the modernization of the grid incorporating adequate technology to comply with transformation objectives, without resulting in excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to ensure the safety and reliability of the electricity infrastructure through the use of modern technological tools, so as to propel an economic and efficient operation and allow integration and deployment of renewable energy sources. *See* Section 1.5(9)(a).** - Act 57: -Develop/implement strategies to further Act 57, including reducing/stabilizing energy costs, demand response programs, RPS, energy storage and DG integration and ensure all rates and charges for purchase, wheeling and interconnection are just and reasonable, in the public interest and comply with PREB regulations. *See* Section 6.3(f).	• Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation)

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Enabling Portfolio			
Vegetation Management This program includes work to abate or mitigate immediate vegetation risk in the most critical locations, along with an ongoing program to clear and re-establish rights-of-way (ROWs) to standard widths. This includes an immediate response for the highest risk sites, along with reclaiming rights-of-way corridors (especially those impacting the transmission and distribution systems). The program will also use a field enabled IT tool to manage the vegetation management program, along with ongoing line clearance, pruning, tree removal, herbicides, etc. and vegetation management training. In addition, the program will evaluate and pilot an advanced	-Implement a vegetation management plan in accordance with Prudent Utility Practice and Applicable Law. OMA, Annex I, Section II(A)(10). -Develop and submit to PREB and Administrator a Vegetation Management Plan during the Front-End Transition Period that will become effective on the Service Commencement Date. Section 4.2(h).	Act 17: -An initial objective of the law is to establish priorities for the maintenance of infrastructure of the electric system and create vegetation management plans. *See* Section1.6(5) -The Operator of the T&D must prepare and present a comprehensive Vegetation Management Program in accordance with best industry practices to protect the integrity of the grid. This program must meet the requirements of this Section including required clearances, routine patrolling and releasing vegetation,	• Prioritize safety (implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

artificial intelligence (AI) remote sensing project to improve vegetation management.		adopting accepted industry tree trimming standards, such as ANSI, produce periodic and detailed compliance reports; establish adequate and independent fund for the program. *See* Section 1.16. **-It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** Act 57: -PREB will oversee the compliance of T&D Operator with a vegetation management plan in accordance with best practices in the industry to protect the grid. See Section 6.3 (ww). **- It is a public policy that the infrastructure be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2 (e) and (f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	1
T&D Fleet The T&D Fleet program includes a range of activities and investments to bring the current fleet up to industry standards including vehicles, aircraft and equipment. Additionally, activities will be focused on initializing and improving processes for data collection, repair and maintenance of these assets.	-Perform normal and ordinary maintenance of all property (including fleet, machinery and tools), keep systems in operational condition and repair in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, materials, supplies, equipment, spare parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I(VIII)(A). -Provide fleet management and refueling in compliance with Commonwealth and federal alternative fuel environmental compliance programs, maintenance, signage. Annex I(II)(C).	- Act 17: **It is a public policy to maintain the electric infrastructure in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** **-It is a public policy, among other things, that there be compliance with applicable environmental laws and regulations to improve the quality of life of Puerto Ricans and ecosystems in Puerto Rico. *See* Section 1.5(6)(a).** -Electric service companies to address energy and environmental challenges using available scientific and technological advances and incorporating best practices in the energy industry in other jurisdictions (see Section 1.10(c)) and to comply with all applicable environmental laws and regulations (see Section 1.10(g)).	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

		Act 57: **-It is a public policy that every consumer shall have the right to receive a reliable, stable, and excellent electric power service. *See* Section 1.2(l).**	1
Tools Repair & Management This program focuses on a personal protective equipment (PPE) and tooling plan to address safety needs along with putting in place a better system for managing PPE and tools. In addition to acquiring the needed PPE and tools, this program includes implementation of a centralized Tool and Equipment Crib system to improve inventory management, tool maintenance, tool supply and coordination and oversight of tool and equipment use.	-Take all reasonable precautions for the health and safety of, and provide all reasonable protection to prevent physical damage, bodily injury or loss as a result of the operation of the T&D System to all members of the public and persons involved in providing O&M Services, among other things. Section 5.7(a). -Take all actions which may be required to bring the T&D System into and maintain compliance with applicable Commonwealth and federal requirements in accordance with and related to the Occupational Health and Safety Act. Section 5.7(b). -Maintain, improve, and develop a culture of safety. Annex I, Section I(B)(1). -Manage effectively an environmental, health and safety program and maintain compliance with the corresponding regulatory requirements. Annex I, Section I(D)(3) and (4). -Maintain inventory and maintain and document an inventory control program (including of materials and parts), comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). -Determine, acquire deploy and maintain tools, equipment and Information Systems necessary to perform all O&M services. Annex I, Section II(D). -Perform normal and ordinary maintenance of all property (including fleet, machinery and tools), keep system in operational condition and repair in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, materials, supplies, equipment, spare	Act 17: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. *See* Section 1.5(9)(e).** Act 57: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. *See* Section 1.2(f).**	• Prioritize safety (Promote safe workplace; implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

	parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I, Section VIII(A). -Conduct maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C).		1
HSEQ and Technical Training This program provides health, safety, environment and quality (HSEQ) and technical training to field personnel. During the initial stage, basic technical training will be provided through the LUMA College and HSEQ training conducted by internal subject matter experts and external providers. Personnel will gain technical skills training for field employees to become fully qualified to complete their work safely and efficiently. Subsequent enhanced technical training will be provided through the LUMA College. Enhanced training modules will be developed and administered based on operational needs for the type of technology being implemented but could include areas such as operation of smart grids, work on energized lines (e.g., hot line and barehand programs), splicing of conductors and helicopter work for transmission repairs. This program will help to instill a new safety culture across the T&D System, thus reducing safety incidents, bringing the T&D System into compliance with Contract Standards, including but not limited to OSHA and broader industry standards and improving overall employee efficiency.	-Implementing safety measures in maintenance activities, by among other things, designating qualified and responsible employees for supervision of T&D health and safety, prevention of fires and accidents and coordination of activities with federal and local officials. Annex I, par. (VIII)(C)(5). -As part of day to day operations, conduct hiring and training of human resources. Annex I, par. I(B)(8).	Act 17: **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy, among other things, that there be compliance with applicable environmental laws and regulations to improve the quality of life of Puerto Ricans and ecosystems in Puerto Rico. *See* Section 1.5(6)(a).** -Electric service companies are to comply with applicable environmental laws and regulations. See Section 1.10(g). Act 57: **-It is a public policy for the electricity infrastructure to be maintained in optimal conditions to ensure reliability and safety of the electric service. See Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of the business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)
Asset Data Integrity This program is targeted at assuring the integrity of key asset data, with a focus on GIS and Computerized Maintenance Management System (CMMS). The program works with stakeholders to identify data requirements, determine process and templates for storing data and update asset data systems with data gathered from asset inspections. These systems and the integrity of their information are fundamental for accurate modeling, operations and planning of the T&D System.	-Manage and maintain all assets of the T&D System, including machinery, equipment, structures, improvements and condition assessment of the electrical system components, in accordance with the Contract Standards. Annex I, Section II (A).	Act 17: - The modernization of the T&D System to be achieved through specific improvements to the T&D System which will require obtaining system data through an effective and accurate GIS system. **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).**	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of the business; pursue project delivery excellence; enable employees to execute operations systematically)

Permits Processes & Management LUMA will introduce new systems for managing operational permits to enable the system to comply with permit obligations and to provide support for federal funding requirements. The program will develop new procedures so that responsible parties have the tools to meet permit obligations and identify additional necessary permits, along with introducing training programs to allow those procedures to be implemented effectively. As part of this program, LUMA will continue to engage with government agencies to adhere to any adjusting permitting procedures or requirements to be implemented after commencement.	-Along with PREPA and the P3 Authority, to identify the Governmental Approvals required for the commencement of operations on the Service Commencement Date and assist PREPA with any required assignments and/or new applications. Section 4.4. -Make all filings and applications and submit all reports necessary to obtain and maintain all Governmental Approvals in the name of PREPA, or if required by Applicable Law, LUMA. Section 5.6(b). -Effectively manage an environmental, health and safety program. Annex I, Section I(D)(3). -Be responsible for environmental compliance, maintenance of documentation and acquisition of permitting required for T&D operations. Annex I, Section I(G)(2).	Act 17: **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy, among other things, that there be compliance with applicable environmental laws and regulations to improve the quality of life of Puerto Ricans and ecosystems in Puerto Rico. *See* Section 1.5(6)(a).** -Electric service companies are to comply with applicable environmental laws and regulations. *See* Section 1.10(g). Act 57: **-It is a public policy for the electricity infrastructure to be maintained in optimal conditions to ensure reliability and safety of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of the business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding)
Workflow Processes & Tracking This program includes several initiatives that address gaps between current state and standard industry methods, practices, and processes to manage, track, and report progress on the performance of work in the field. Specific areas include: -Establishing proper and safe maintenance regimens (preventive, planned and unplanned corrective, and emergency repairs) -Adherence to design, maintenance, and construction standards, -Implementing proper inspection and testing procedures, -Key Performance Indicators (KPIs) / Metric performance management with a focus on measuring and driving improvements in work quality, effectiveness, and efficiency, and -Implementing technologies to reduce cycle time in identifying and remediating any performance anomalies while concurrently supporting the Asset Management function.	-Manage and maintain all assets of the T&D System in accordance with Contract Standards. Annex I, Section II(A). -Use asset management strategies and risk optimization to achieve combined technical performance, life cycle cost, safety, customer satisfaction and regulatory compliance. Annex I, Section II(A)(1). -Perform normal and ordinary maintenance of all property (including fleet, machinery and tools); keep system in operational condition and repair in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, material, supplies, equipment, spare parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice; and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I, Section VIII(A).	Act 17: **-It is a public policy that the energy infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety. *See* Section 1.5(9)(e).-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** Act 57: **-It is a public policy, among other things, that the infrastructure be maintained in optimal condition. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of the business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

Materials Management This program covers all aspects of materials management and includes management of: Asset recovery Oil containment Inventory management Asset suite reconfiguration Demand training Implementation and measurement of KPIs related to materials Capital plans for material handling and warehousing storage and facility improvements Logistics function and related equipment Material evaluation and disposition	-Take all reasonable precautions for the health and safety of, and provide all reasonable protection to prevent physical damage, bodily injury or loss as a result of the operation of the T&D System to (A) all members of the public and persons involved in providing O&M Services; (B) all materials and equipment used in the provision of the O&M Services and under the care, custody or control of Operator; and (C) other property constituting part of the T&D System and under the care, custody or control of Operator. OMA, Section 5.7(a)(i)(A) and (B). -Establish and enforce all reasonable applicable safeguards for health and safety and protection, including posting danger signs and other warnings against hazards and promulgating health and safety regulations; and develop and carry out a site-specific health and safety program, including employee training and periodic inspections designed to implement the requirements of Section 5.7(a) of the OMA (Safety and Security-Safety). Section 5.7(a)(ii) and (vii). -Take all actions which may be required in order to bring the T&D System into and maintain compliance with applicable Commonwealth and federal requirements in accordance with and related to the Occupational Health and Safety Act. OMA, Section 5.7(b). -Manage and maintain all assets of the T&D System in accordance with Contract Standards, including procurement and inventory management. Annex I, Section II(A)(5). -Maintain, improve and develop a culture of safety. Annex I, Section I(B)(1). -Manage effectively an environmental, health and safety program and maintain compliance with the corresponding regulatory requirements. Annex I, Section I(D)(3) and (4). -Maintain inventory and maintain and document an inventory control program (including of materials and supplies), comply with inventory policy in Annex I, implement inventory consistent with T&D System policies and procedures adopted from time to time in accordance with Prudent Utility Practice, the Emergency Response	Act 17: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. *See* Section 1.5(9)(e).** **-It is a public policy, among other things, that there be compliance with applicable environmental laws and regulations to improve the quality of life of Puerto Ricans and ecosystems in Puerto Rico. *See* Section 1.5(6)(a).** -Electric service companies to address energy and environmental challenges using available scientific and technological advances and incorporating best practices in the energy industry in other jurisdictions (see Section 1.10(c)) and to comply with all applicable environmental laws and regulations (see Section 1.10(g)). **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** Act 57: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of the business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid infrastructure)

	Plan and/or the Federal Funding Procurement Manual. Annex I, Section II(B)(1)-(3). - Determine, acquire deploy and maintain tools, equipment and Information Systems necessary to perform all O&M services. Annex I, Section II(D). -Perform normal and ordinary maintenance of all property (including fleet, machinery and tools), keep system in operational condition and repair in neat and orderly condition in accordance with Contract Standards; provide or make provisions for labor, materials, supplies, equipment, spare parts, consumables and services for maintenance consistent with Contract Standards and Prudent Utility Practice and conduct predictive, preventive and corrective maintenance as required by Contract Standards. Annex I, Section VIII(A). -Conduct maintenance with due regard for public health and safety and at a safe level consistent with Contract Standards. Annex I, Section VIII(C).		1
Operator Training This program will provide all necessary requirements to support new and existing system operator training along with operator competency assessments. As such, the program will address the need to improve current operator training and allow for new cohort(s) of operators to support the system. This will also improve operator response during an emergency situation.	-Be responsible for day-to-day operation of the T&D System, including all human resources functions, including hiring and training employees. Annex I, Section I(B)(8). -Conduct meter-reading crew training to be able to detect and prosecute misuse. Annex I, Section IX(G)(1)(m). -Develop and carry out a site-specific health and safety program, including employee training. Section 5.7(a).	Act 17: **It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. *See* Section 1.5(9)(e).**	• Prioritize safety (Promote safe workplace) Operational excellence (Enable employees to execute operations systematically)
Support Services Portfolio			
HR Programs This Program Brief covers four separate programs to support the LUMA Human Resources (HR) department. This includes the following programs: -**Employee benefits**. LUMA will implement industry competitive benefits programs for its employees such as an Employee Assistance Program (EAP), Long term Disability (LTD), Short term Disability (STD), Life Insurance, and a defined contribution plan (401(k)). -**Employee engagement**. LUMA will launch an employee engagement strategy to ensure all employees feel part of the new LUMA family, and they feel engaged with decision making and their long-term career	Annex I of the OMA requires the Operator be responsible for the day-to-day operation of the T&D System including all human resources functions, including hiring and training employees.	Act 17: **It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. *See* Section 1.5(9)(e).**	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure)

progression. The comprehensive employee engagement strategy includes employee activities, regular employee surveys, volunteerism, town halls, career growth opportunities and spaces where employees can express their feedback. -**Training**. LUMA will implement core compliance training programs to ensure employee understanding and compliance with all Corporate policies and procedures, State Laws and Regulations, to prevent any inappropriate conduct. In addition, all functions in LUMA will implement a training program inclusive of at least the minimum requirements necessary to improve employee skill sets to bring performance to Contract Standards. This comprehensive functional training program will be applied across all functions in LUMA. -**Support software**. The scope of the General Technology Human Capital Management program is to introduce standardized processes for management of employee data, employee performance management, talent management, succession planning, recruitment on-boarding and off-boarding management, learning management and compensation management. It will also provide employee and manager self-service capabilities			• Other (Attract talent, increase employee retention and provide incentive for improved performance) 1
IT OT Asset Management LUMA will introduce industry standard IT OT asset management procedures and provide the necessary system upgrades to ensure secure business operation and continuity, as well as improved customer responsiveness. The scope of the program includes assessing PREPA's application and infrastructure portfolio and beginning a series of software and infrastructure upgrades that drive toward a transition to cloud-based technology. IT OT resilience in this program also extends to the establishment of a new backup data center to ensure reliability and resilience of technology systems. **]**	-Consistent with Contract Standards be responsible for providing information technology systems maintenance support and improvements in accordance with strategic goals of achieving interoperability and flexibility of open design and standard-based data architecture and in compliance with requirements that support network and day-to-day activities. Annex I, Section II(E). -Manage and maintain all assets of the T&D System in accordance with Contract Standards by using strategies and risk optimization to achieve combined technical performance, life cycle cost, safety, customer satisfaction and regulatory compliance. Annex I, Section II(A).	Act 17: **-It is a public policy that every electric service company design mitigation options adapted to their information technology networks and operations, which shall include the adoption of specific cyber security measures to effectively prevent and manage cyber-attacks. *See* Section 1.5 (8)(d).** **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. *See* Section 1.5(9)(e).**	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (Improve resilience of vulnerable infrastructure)
IT OT Cybersecurity Program The program centers on enabling the business and protecting key organizational assets, including people, resources and technology to ensure that cyber risk, internal and external threats, vulnerabilities, and natural disasters are identified and mitigated based on risk and readiness factors. Improving cybersecurity is a critical part of hardening the Transmission and Distribution (T&D) system and	Section 13 of the OMA requires compliance with a Data Security Plan to meet the standards requirements specified in the OMA.	Act 17: **-It is a public policy and an initial objective to be reached under that law, that all electric service companies design options for mitigation adapted to their information and operative technology networks, including adoption of concrete cyber security measures to prevent and effectively manage**	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability)

ensuring business continuity. Cyber risks could severely impact T&D operations to the extent of widespread failure. This program will design and implement the people, processes, and technologies essential for effective cybersecurity governance, cybersecurity operations and monitoring, vulnerability identification and management, and cloud security.		**cyber-attacks. *See* Section 1.5(8)(d) and 1.6(6). - It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** Act 57: -PREB to oversee that electric service companies establish measures to prevent and effectively manage cyber-attacks that could affect the information and operative technology networks in accordance with recognized industry practices. *See* Section 6.3(xx).-**It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. *See* Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	• Operational excellence (Enable systematic management of business; enable employees to execute operations systematically) • System rebuild and resilience (Improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation)

IT OT Enablement Program This program will implement capabilities to deliver and maintain IT OT services and systems enabling LUMA operations through the implementation of industry best practices and standardized processes and tools. Fit for purpose devices will be deployed to carry out business operations enabling near real-time access to electric network data providing a safer work environment. Industry best practices for Information Technology Service Management (ITSM) will be implemented so that technology assets are managed, provisioned and maintained securely. Processes will be implemented to establish end user device standards along with mobile application management (MAM) to control how end user devices are used. Enterprise Architecture (EA) and project management frameworks will be implemented to ensure software and infrastructure assets are implemented, maintained and disposed of in accordance with vendor support requirements including patching and upgrades. This will mitigate the risk of prolonged system outages on non-vendor supported software and infrastructure. By the end of the program LUMA will have developed and executed an operational data strategy, developed foundational enterprise architecture guidance and outlined a cloud strategy. LUMA's IT and OT organization will be able to design, plan, deliver, operate and control the lifecycle of IT OT services, projects and assets. An IT service management tool will ensure that technology is managed, provisioned and maintained securely to reduce risk to the organization and enable users.	- Manage and maintain all assets of the T&D System in accordance with Contract Standards, including determining, acquiring, deploying and maintaining tools, equipment and Information Systems necessary to perform all O&M services and conducting IT systems maintenance support and improvements in accordance with strategic goals, cybersecurity requirements and a business continuity plan. Annex I, Section II (A), (D) and (E). -Consistent with Contract Standards, provide information technology systems maintenance support and improvements in accordance with, among other things "strategic goals of achieving interoperability and flexibility of open design and standard-based architecture, data modeling and software development life cycle." Annex I, Section II(E). -Develop a data security, cyber security and information security plan relating to the T&D System, which shall be subject to the System Remediation Plan. Section 4.2(h).	Act 17: **- It is a public policy, among other things, to provide incentives for the modernization of the grid that incorporates adequate technology to achieve the transformation objectives without excessive costs. *See* Section 1.5(9)(g).** **- It is a public policy and as an initial objective to be reached under that law, that all electric service companies design options for mitigation adapted to their information and operative technology networks, including adoption of concrete cyber security measures to prevent and effectively manage cyber-attacks. *See* Section 1.5(8)(d) and 1.6(6).** **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** Act 57: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. *See* Section 1.2(f).**	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability) • Operational excellence (Enable systematic management of business; enable employees to execute operations systematically)

	-Ensure that all Operator Related Parties, Contractors and Subcontractors comply with the Data Security Plan, any other Contract Standards and all requirements of Applicable Law regarding data security, cyber security and information security, use commercially reasonable efforts to ensure these parties notify of material Cybersecurity Breaches, loss or theft of data, and take certain actions to address it. Section 13.3(a). -Update the Data Security Plan from time to time to meet the requirements of Section 13.3(b), including that it incorporate reasonable and appropriate organizational, administrative, physical and technical measures to maintain the security of and to protect the internal and external integrity of the System Information and related Information Systems against any unlawful or unauthorized use, processing, destruction, loss, alteration, disclosure, theft or access, among other things. Section 13.3(b).	-All energy companies must provide an adequate, reliable, safe, efficient service, among other things. *See* Section 6.21(a).	1

Critical Financial Controls The Critical Financial Controls program focuses on two key areas, internal control and internal audit. These two areas will build skills and capabilities in financial reporting and audit; and will update and enforce industry standard policies and procedures that comply with the latest laws and regulations. Internal Controls will address various internal control items, including obtaining and reviewing service organization controls for major vendors, the implementation of key transaction controls, reconciliations, validation, physical inspections, documentation evidencing performance of control tasks, disclosures, enforcement of applicable policies and procedures for employees to identify deviations, the establishment of a formal plan for communications with the audit committee and the revamp of the internal audit department. Internal Audit builds the foundation of the internal audit team as well as the development of the methodology and process, along with building and retaining the required skills and technology base.	Pursuant to the OMA, LUMA is responsible for all finance, accounting, budgeting, longer-term financial forecasting, auditing and treasury operations. Annex I, Section VI(B), (C), (D) and (E).	Act 17: **-Charges, rents and rates and any other type of amount charged by an electric service company must be fair and reasonable and consistent with correct fiscal and operational policies that provide a reliable service at the least reasonable cost. *See* Section 1.5(1)(a).** **-It is a public policy that incentives be provided for the modernization of the grid incorporating adequate technology to comply with transformation objectives, without resulting in excessive costs. *See* Section 1.5(9)(g).** **-It is a public policy to ensure the safety and reliability of the electricity infrastructure through the use of modern technological tools, so as to propel an economic and efficient operation and allow integration and deployment of renewable energy sources. *See* Section 1.5(9)(a).** Act 83: -PREPA is responsible for conducting its business in a responsible, efficient manner and with correct fiscal and operational practices. *See* Section 6(c).	• Prioritize safety (Promote safe workplace) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding)

Critical Financial Systems This program covers the technology projects for Finance and Facilities, including financial management systems and technology, risk management systems and supply chain management technology. The initiatives cover areas within budgeting, reporting, consolidation, risk management, time tracking, employee expenses, fixed asset subledger, procurement, and a major life cycle upgrade for the Oracle E-Business Suite (EBS) system. These initiatives are required to maintain a supported version of the financial applications or to address gaps identified in the financial management area.	Pursuant to the OMA, LUMA is responsible for all finance, accounting, budgeting, longer-term financial forecasting and treasury operations. Annex I, Section VI(B), (C), (D) and (E).	Act 17: **-Charges, rents and rates and any other type of amount charged by an electric service company must be fair and reasonable and consistent with correct fiscal and operational policies that provide a reliable service at the least reasonable cost. *See* Section 1.5(1)(a).** **-It is a public policy that incentives be provided for the modernization of the grid incorporating adequate technology to comply with transformation objectives, without resulting in excessive costs. *See* Section 1.5(9)(g).** **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).-It is a public policy to ensure the safety and reliability of the electricity infrastructure through the use of modern technological tools, so as to propel an economic and efficient operation and allow integration and deployment of renewable energy sources. *See* Section 1.5(9)(a).** Act 83: -PREPA is responsible for conducting its business in a responsible, efficient manner and with correct fiscal and operational practices. *See* Section 6(c).	• Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding) • Sustainable energy transformation (Enable the digital transformation)
Land Record Management LUMA will develop a new record management system that allows for land information to be found easily and managed to utility industry standards. This allows compliance with legal requirements to be documented and shown to satisfy regulators. It also allows user groups to have efficient access to information. In particular, such a system lets Operations and Construction perform their work while respecting land rights agreements.	-Be responsible for maintenance of documentation and acquisition of Easements as required for T&D System operations. Annex I, Section I(G)(2). -Manage and maintain all T&D System assets, including Easements. Annex I, Section II(A). -Identify areas to be encumbered by Easements for operation, maintenance, repair, restoration, replacements, improvements, additions and alterations of the T&D System and take the necessary actions to acquire and constitute it. Section 5.19(a).	Act 17: **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).** **-It is a public policy that incentives be provided for the modernization of the grid incorporating adequate technology to comply with transformation objectives, without resulting in excessive costs. *See* Section 1.5(9)(g).**	• Prioritize safety (Implement effective safety practices) • Improve customer satisfaction (Deliver positive customer experience; increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; pursue project delivery excellence) • System rebuild and resilience (Effectively deploy federal funding)
Resource Planning and Processes to Improve Resource Adequacy and Cost Tracking This program focuses on planning studies for dispatch of existing thermal units, along with new processes to audit costs included in the purchased	-Dispatch, schedule and coordinate Power and Electricity from available generation assets and provide related services; coordinate the scheduling of load requirements and Power with IPPs	Act 17: **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just,**	• Improve customer satisfaction (Increase service reliability; deliver electricity at reasonable prices)

power and fuel cost adjustment mechanism tariffs administered by LUMA in accordance with Section 5.6 of the OMA. The program includes creation and implementation of reasonable prudent administrative procedures for reporting of those related fuel and other generation costs as described in the OMA and being able to accurately present these costs to the PREB. The program does not include the management or oversight of fuel purchasing or of any Genco functions. Improved information on fuel costs, inventory, and availability will support resource planning as well as the more efficient and reliable dispatch of peaking power plants and other thermal plants. The program aims to improve resource adequacy and lower energy supply costs. As described in Exhibit H, Section 2.2. of the OMA and subject to the final reorganization plan for PREPA, fuel procurement and management responsibilities for PREPA's generation units will remain with PREPA's Genco unit. According to Section 5.13(b) of the OMA, LUMA shall have the right to reasonably access "... information consistent with Prudent Utility Practice required to perform the dispatch and scheduling of Power and Electricity, which includes fuel availability, fuel cost, fuel inventory, unit availability, unit marginal cost, unit outage schedules, electric system reliability requirements, reserve requirements, identification of must-run generation resources and any other information reasonably requested by Operator consistent with prudent Utility Practice required to perform the dispatch, scheduling, and coordination of Power and Electricity." Under the OMA, LUMA has the responsibility of presenting adjustments to the fuel adjustment and purchased power tariff clauses. Under the OMA, LUMA will manage and administer all existing and future PPOAs.	pursuant to their Generation Supply Contracts and Electricity and GenCo pursuant to the GridCo-Genco PPOA; implement and apply, on a continuous basis on the relevant time basis applicable, the System Operations Principles in order to ensure and coordinate the delivery of Power and Electricity; and perform any other services related to the dispatch, scheduling or coordination of Power and Electricity from existing and future available generation assets, among other things. Section 5.13(a).	**and reasonable, and a fast service response. *See* Section 1.5(10)(a).** **-It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).**	• Operational excellence (Enable systematic management of business) • System rebuild and resilience (Improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Enable the digital transformation)
Improvements to Systems Dispatch for Increased Reliability and Resiliency This program deals with the repair of non-functioning equipment and processes to allow for the System Operator to have data to carry out economic dispatch of generation assets, in accordance with the System Operation Principles and applicable procedures, and to allow for the safe and reliable operation of the system.	-Dispatch, schedule and coordinate Power and Electricity from available generation assets and provide related services; coordinate the scheduling of load requirements and Power with IPPs pursuant to their Generation Supply Contracts and Electricity and GenCo pursuant to the GridCo-Genco PPOA; implement and apply, on a continuous basis on the relevant time basis applicable, the System Operations Principles in order to ensure and coordinate the delivery of Power and Electricity; and perform any other services related to the dispatch, scheduling or coordination of Power and Electricity from existing and future available generation assets, among other things. Section 5.13(a).	Act 17: **-It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable, and a fast service response. *See* Section 1.5(10)(a).** **- It is a public policy that the electric infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of electric service. *See* Section 1.5 (9)(e).**- It is an initial objective of Act 17 to facilitate the interconnection of distributed generation to the electric power grid through any available mechanism including, but not limited to, distributed generation, renewable energy sources, net metering, and the use of microgrids by implementing the mechanisms, strategies, and technologies available in	• Prioritize safety (Promote safe workplace) • Improve customer satisfaction (Increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable employees to execute operations systematically) • System rebuild and resilience (Improve resilience of vulnerable infrastructure)

		the electric power industry for such purposes. See Section 1.6 (8). - It is an initial objective of Act 17 to promote demand response and energy efficiency programs with a defined timetable and incentives in order to make short-, medium- and long-term programs feasible, while stressing the benefits that such programs provide to consumers and the electrical system. See Section 1.6 (10). - PREPA or the transmission and distribution network Contractor shall fix, from time to time and subject to the Bureau's review and approval, the optimal reserve margin for Puerto Rico, taking into account the best industry practices as well as the geographic and electricity infrastructure realities of Puerto Rico, and shall work to maintain such reserve, thus ensuring the continuity and reliability of the electric power service in Puerto Rico. See Section 1.11(c).	1
Waste Management In accordance with the requirements of the OMA Section 5.10 and the scope of OMA Services specified in Annex I, LUMA will install new equipment and implement management processes to comply with environmental statutory requirements and support safe and efficient operations. The program includes installing secondary containment to prevent contamination, ensuring proper containers are in place to store wastes and, when required for site operations, processing or removal of accumulated waste debris. LUMA will take actions with respect to pre-existing environmental conditions, including accumulated waste, in accordance with the OMA Section 5.10(b).	-Perform the following environmental health and safety activities related to the provision of electric service to T&D Customers: (i) managing an environmental, health and safety program for the T&D System in accordance with the Contract Standards; and (ii) coordinating, overseeing, ensuring and maintaining compliance of the T&D System with Environmental Law, including documentation thereof, among other things. Section 5.10(a). -Take all reasonable precautions for the health and safety of, and provide all reasonable protection to prevent physical damage, bodily injury or loss as a result of the operation of the T&D System to (A) all members of the public and persons involved in providing O&M Services; (B) all materials and equipment used in the provision of the O&M Services and under the care, custody or control of Operator; and (C) other property constituting part of the T&D System and under the care, custody or control of Operator. Section 5.7(a)(i)(A) and (B). -Establish and enforce all reasonable applicable safeguards for health and safety and protection, including posting danger signs and other warnings against hazards and promulgating health and safety regulations; and develop and carry out a	Act 17: -Electric service companies to address energy and environmental challenges using available scientific and technological advances and incorporating best practices in the energy industry in other jurisdictions (See Section 1.10(c)) and to comply with all applicable environmental laws and regulations (See Section 1.10(g)). **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure reliability, resiliency and safety of the electric service. See Section 1.5(9)(e).** **-It is a public policy, among other things, that there be compliance with applicable environmental laws and regulations to improve the quality of life of Puerto Ricans and ecosystems in Puerto Rico. See Section 1.5(6)(a).** Act 57: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. See Section 1.2(f).**	• Prioritize safety (Promote safe workplace) • Operational excellence (Enable systematic management of business)

	site-specific health and safety program, including employee training and periodic inspections designed to implement the requirements of Section 5.7(a) of the OMA (Safety and Security-Safety). Section 5.7(a)(ii) and (vii). -Take all actions which may be required in order to bring the T&D System into and maintain compliance with applicable Commonwealth and federal requirements in accordance with and related to the Occupational Health and Safety Act. Section 5.7(b). -Manage and maintain all assets of the T&D System in accordance with Contract Standards, including procurement and inventory management. Annex I, Section II(A)(5). -Maintain, improve and develop a culture of safety. Annex I, Section I(B)(1). -Manage effectively an environmental, health and safety program and maintain compliance with the corresponding regulatory requirements. Annex I, Section I(D)(3) and (4).		1
Update to Third Party Use, Audit, Contract and Billing Procedures This program is focused on updating procedures for third party use of land, use of infrastructure, audits, contracts, and billing. The program will include: Developing consistent processes and agreement templates to ensure compliance with legislation; Streamlining and improving customer service for third parties who wish to use pole infrastructure; Establishing annual billing to third parties to ensure they are paying the associated fee to attach to each individual structure (either overhead or underground); Completing updates and corrections to the CC&B system to ensure data accurately reflects the current asset management joint use attachment numbers and identifies responsible billing parties; and Implementing necessary changes to the billing process for joint use billing, which may include contract updates and renegotiation.	-Complete inventory, including location of pole attachments, and plans for revenue optimization be made. Annex I, Section II(D).	Act 17: **--It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable. See Section 1.5(10)(a).** Act 83: -PREPA is responsible for conducting its business in a responsible, efficient manner and with correct fiscal and operational practices. See Section 6(c).	• Prioritize safety (Promote safe workplace; implement effective public safety practices) • Improve customer satisfaction (Deliver positive customer experience; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Restore damaged grid infrastructure; improve resilience of vulnerable infrastructure) Other (Provide additional revenue)
Safety Equipment This program is focused on updating procedures for third party use of land, use of infrastructure, audits, contracts, and billing. The program will include:	-Develop and carry out site-specific health and safety programs, including employee training. Section 5.7(a). -Take all actions which may be required in order to bring the T&D System into and maintain	Act 17: **It is a public policy that the energy infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety. See Section 1.5(9)(e).**	• Prioritize safety (Promote safe workplace; implement effective public safety practices • Operational excellence (Pursue project delivery excellence; enable employees to execute operations systematically)

Developing consistent processes and agreement templates to ensure compliance with legislation; Streamlining and improving customer service for third parties who wish to use pole infrastructure; Establishing annual billing to third parties to ensure they are paying the associated fee to attach to each individual structure (either overhead or underground); Completing updates and corrections to the CC&B system to ensure data accurately reflects the current asset management joint use attachment numbers and identifies responsible billing parties; and Implementing necessary changes to the billing process for joint use billing, which may include contract updates and renegotiation.	compliance with the applicable Commonwealth and federal requirements in accordance with and related to OSHA. Section 5.7(b). -Manage an effective health and safety program. Annex I, Section I(D).	Act 57: **-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. See Section 1.2(f).**	1
Integrated Safety & Operational Management System LUMA will centralize policy and procedure creation by using a fully integrated, efficiently managed internal safety and operational management system that will allow communication of requirements to all employees and monitor health, safety and environmental compliance organization wide. The system will have clear operational procedures and controls and will be easy to use and easily updated.	-Develop and carry out site-specific health and safety programs, including employee training. Section 5.7(a). -Take all actions which may be required in order to bring the T&D System into and maintain compliance with the applicable Commonwealth and federal requirements in accordance with and related to OSHA. Section 5.7(b). -Manage an effective health and safety program. Annex I, Section I(D).	Act 17: **-It is a public policy that the energy infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety. See Section 1.5(9)(e).** -Electric service companies to address energy and environmental challenges using available scientific and technological advances and incorporating best practices in the energy industry in other jurisdictions (see Section 1.10(c)) and to comply with all applicable environmental laws and regulations (see Section 1.10(g)). Act 57: -It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. See Section 1.2(f).	• Prioritize safety (Promote safe workplace) • Operational excellence (Enable employees to execute operations systematically)

Public Safety LUMA will introduce an organizational strategy to engage and educate the public on safety around electric equipment and installations, thereby reducing public safety incidents. The program will include the procurement of public safety related materials for training awareness and public outreach, the development and complete roll out of a communications plan and a continuing maintenance plan for the program.	- Develop public outreach and education campaigns designed to inform customers generally and first responders specifically, about the scope, nature and extent of the T&D System programs and operations. Annex I, Section IX(D). -Maintain, improve and develop a culture of safety. Annex I, Section I(B)(1). -Use strategies and risk optimization to achieve safety, among other things. Annex I, Section II(A)(1). -Take all reasonable precautions for the health and safety of, and provide all reasonable protection to	Act 17: **-It is a public policy that the energy infrastructure be maintained in optimal conditions to ensure reliability, resilience and safety. See Section 1.5(9)(e).** **It is a public policy to guarantee every consumer's right to receive a reliable, stable, and excellent electric power service at a cost that is accessible, just, and reasonable. See Section 1.5(10)(a).** Act 57:	• Prioritize safety (Promote safe workplace; implement effective safety practices • Improve customer satisfaction (Deliver positive customer experience; increase service reliability; deliver electricity at reasonable prices) • Operational excellence (Enable systematic management of business; pursue project delivery excellence; enable employees to execute operations systematically) • System rebuild and resilience (Effectively deploy federal funding; restore damaged grid

	prevent physical damage, bodily injury or loss as a result of the operation of the T&D System to members of the public. Section 5.7.	**-It is a public policy, among other things, that the electricity infrastructure be maintained in optimal conditions to ensure the reliability and safety of the electric service. See Section 1.2(f).** -All energy companies must provide an adequate, reliable, safe, efficient service, among other things. See Section 6.21(a).	infrastructure; improve resilience of vulnerable infrastructure) • Sustainable energy transformation (Modernizing the grid; enable the digital transformation; enable the sustainable energy transformation) Other (Environmental)