

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

NEPR Received: Apr 19, 2021 12:06 PM

IN RE: THE PERFORMANCE OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Additional Baseline Metrics

**MOTION TO SUBMIT ADDITIONAL PERFORMANCE METRICS IN
COMPLIANCE THE RESOLUTION AND ORDER ENTERED ON**

COMES NOW, the Puerto Rico Electric Power Authority (PREPA) through its undersigned legal representation and respectfully submits and prays as follows:

1. On April 8, 2021, the Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) entered *Resolution and Order* directing PREPA to among other things, provide additional information regarding the establishment of PREPA’s performance baseline.¹

2. The following list includes a summary of each request for information and PREPA’s response:

- a. Provide Days of Sales Outstanding (DSO) Metric from both Government and General Customers metric as part of the Customer Service category.

Response: See Exhibit A.

- b. Correction of reliability metrics to be consistent with IEEE 1366 methodology for calculation SAFI and SAIDI, including transmission and substation related outage codes that PREPA excluded along with revised and updated calculation for T_{MED} threshold, and all analysis and calculations performed to determine T_{MED}.

¹ *Resolution and Order* entered on April 8, 2021 (the “Order”).

Response: PREPA works on the reliability index calculations based on an application created by PREPA. Due to the complexity of the information requested, the application requires complex changes in programming to be able to calculate the indexes as required. For this reason, PREPA requests an extension of ten (10) days to make the changes that are necessary to produce the requested information and also, to verify the quality of the data obtained before submitting the information to the Energy Bureau.

c. Additional safety metrics

- i. OSHA Recordable Incident Rate;
- ii. OSHA Fatalities;
- iii. OSHA Severity Rate; and
- iv. OSHA Days Away, Restricted or Transferred (DART) Rate.

Response: See Exhibit B.

WHEREFORE, PREPA requests the Energy Bureau to note PREPA's compliance with Section V.A.(1)(2) of the Order and also, to grant an extension of ten (10) days to supplement this motion and comply with Section V.A.(3) of the Order.

RESPECTFULLY SUBMITTED.

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

/s Katuska Bolaños-Lugo
Katuska Bolaños-Lugo
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TSPR 18,888

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CERTIFICATE OF SERVICE

It is hereby certified that, on this same date, I have filed the above motion with the Clerk of the Energy Bureau using the Energy Bureau's Electronic Filing System, at the following address: <http://radicacion.energia.pr.gov> It is further certified that I have sent a copy to margarita.mercado@us.dlapiper.com and mmercado@mercado-echegaray-law.com.

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

s/ Katuska Bolaños-Lugo
Katuska Bolaños-Lugo

Exhibit A

[The native Excel file has been submitted separately.]

Metric	Unit of Measure	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21
Customer Service																						
DSO (Days Sales Outstanding) - Total customers		201	217	185	209	192	209	197	150	157	195	281	173	194	158	202	182	213	176	190	195	208
DSO (Days Sales Outstanding) - government customers	Days	N/A	N/A	684	789	801	742	752	453	443	458	649	497	536	582	569	545	605	554	579	557	406
DSO (Days Sales Outstanding) - general customers	Days	N/A	N/A	110	123	112	125	115	110	116	148	216	129	145	114	151	135	153	128	138	138	159

Exhibit B

[The native Excel file has been submitted separately.]

Historial de Lesiones y Enfermedades Registrables

Informe de Registro de casos OSHA por año
Date: April 19 2021

INFORME DE REGISTRO DE CASOS OSHA POR AÑO																				
AÑO	Death (right axis)	Cases with Days away from work	Job transfer or rest. Cases	Other recordable cases	Total Incidents	Total number of days of job transfer or restriction	Total number of days away from work	Injuries and illnesses	Injury (1)	Skin Disorder (2)	Respiratory Condition (3)	Poisoning (4)	Hearing Loss (5)	Other (6)	Promedio Anual de Número de Empleados	TOTAL HORAS TRABAJADAS	IR	LTC	DART	Severity Rate
2002	1	1,008	0	89	1,070	54,937	1,070	1,055	1	6	0	0	8	10,154	17,517,698	12.2	11.5	11.5	627.2	
2003	2	1,046	9	28	1,085	66,009	1,085	1,041	13	4	0	27	9,885	17,078,683	12.7	12.2	12.4	773.0		
2004	0	1,146	4	257	1,407	69,499	1,407	1,112	4	5	0	255	31	9,966	17,177,387	16.4	13.3	13.4	809.2	
2005	2	994	130	135	1,261	3,235	1,261	980	50	54	2	40	135	9,762	15,155,505	16.6	13.1	14.8	834.0	
2006	2	1,159	167	160	1,488	2,367	1,488	1,290	36	44	0	78	68	9,560	20,173,877	14.8	11.5	13.1	670.4	
2007	1	914	166	191	1,272	5,169	1,272	1,129	31	15	0	29	68	9,518	16,873,417	15.1	10.8	12.8	710.7	
2008	3	1,082	235	190	1,510	6,727	1,510	1,260	16	45	0	155	63	9,543	16,350,798	18.5	13.2	16.1	889.0	
2009	0	980	124	143	1,247	3,932	1,247	1,137	11	22	0	1	63	8,962	14,327,982	17.4	13.7	15.4	1,291.2	
2010	2	949	120	185	1,256	7,337	1,256	1,038	10	8	0	0	83	8,772	14,331,597	17.5	13.2	14.9	1,068.5	
2011	2	988	56	136	1,162	1,121	1,162	1,013	23	9	0	0	27	8,609	11,791,281	19.7	16.4	17.4	1,140.7	
2012	0	1,039	55	120	1,214	1,763	1,214	1,070	19	17	0	15	93	8,931	15,146,976	16.0	13.7	14.4	724.9	
2013	0	1,191	22	146	1,359	175	1,359	1,204	18	13	0	1	100	7,836	14,493,599	18.8	16.4	16.7	541.7	
2014	3	767	4	205	979	18	979	865	12	22	0	20	60	7,747	12,197,587	16.1	12.6	12.6	296.2	
2015	0	458	1	298	757	81	757	666	24	6	2	2	43	6,726	11,527,910	13.1	7.9	8.0	75.5	
2016	0	467	2	246	704	11	704	512	60	7	1	1	72	6,956	10,782,452	13.1	8.7	8.7	117.7	
2017	0	358	0	203	650	0	650	518	0	2	6	1	106	6,060	9,032,998	14.4	7.9	7.9	68.6	
2018	0	366	0	221	587	0	587	404	3	1	1	1	162	5,638	10,950,167	10.7	6.7	6.7	44.6	
2019	0	287	1	161	449	9	449	293	7	10	0	11	128	5,359	9,391,621	9.6	6.1	6.1	34.5	
2020	0	98	0	24	122	0	122	110	0	0	2	0	10	4,825	8,481,105	2.9	2.3	2.3	21.4	
YTD 2021	0	5	0	1	6	0	6	4	0	0	0	0	1	5,095	741,096	1.6	1.3	1.3	9.7	
Forecast																				
Include days from accidents on previous months																				
ACTUAL Jan-17	0	30	0	23	53	0	195	53	42	1	0	0	4	6,328	761,312	13.92	7.88	7.9	51.2	
ACTUAL Feb-17	0	40	0	15	55	0	296	55	45	1	0	0	7	6,179	852,586	12.90	9.38	9.4	69.4	
ACTUAL Mar-17	0	32	0	29	61	0	236	61	43	0	1	0	2	6,167	977,338	12.48	6.55	6.5	48.3	
ACTUAL Apr-17	0	39	0	19	58	0	235	58	50	0	1	0	1	6,221	903,411	12.84	8.63	8.6	52.0	
ACTUAL May-17	0	61	0	21	82	0	480	82	67	0	1	0	13	6,205	809,615	20.26	15.07	15.1	118.6	
ACTUAL Jun-17	0	44	0	22	66	0	303	66	47	0	1	1	3	6,205	750,258	17.59	11.73	11.7	80.8	
ACTUAL Jul-17	0	37	0	21	58	0	272	58	46	0	1	0	2	6,143	706,692	16.41	10.47	10.5	77.0	
ACTUAL Aug-17	0	40	0	29	69	0	311	69	57	0	0	0	12	6,108	920,704	14.99	8.69	8.7	67.6	
ACTUAL Sep-17	0	13	0	14	27	0	168	27	24	0	0	0	3	5,998	931,676	5.80	2.79	2.8	36.1	
ACTUAL Oct-17	0	22	0	10	32	0	112	32	29	0	0	0	0	6,178	1,419,406	4.51	3.10	3.1	15.8	
ACTUAL Nov-17	0	23	0	12	35	0	159	35	29	0	0	0	6	5,097	1,250,295	5.60	3.68	3.7	25.4	
ACTUAL Dec-17	0	35	0	19	54	0	330	54	39	0	0	0	15	5,885	1,199,871	9.00	6.83	6.8	55.0	
ACTUAL Jan-18	0	25	0	10	35	0	171	35	25	0	0	0	10	5,795	1,030,205	6.79	4.85	4.9	33.2	
ACTUAL Feb-18	0	35	0	28	61	0	302	61	46	1	0	1	13	5,780	893,543	13.65	7.83	7.8	67.6	
ACTUAL Mar-18	0	31	0	28	59	0	187	59	45	0	0	4	10	5,806	1,025,994	11.50	6.04	6.0	36.5	
ACTUAL Apr-18	0	41	0	25	66	0	263	66	42	0	1	2	21	5,776	1,070,835	12.33	7.66	7.7	49.1	
ACTUAL May-18	0	29	0	19	48	0	186	48	26	0	0	1	21	5,719	1,049,723	9.15	5.53	5.5	35.4	
ACTUAL Jun-18	0	34	0	17	51	0	247	51	35	0	1	0	15	5,661	986,304	10.34	6.89	6.9	50.1	
ACTUAL Jul-18	0	31	0	15	46	0	198	46	31	0	0	0	15	5,562	818,043	11.25	7.58	7.6	48.4	
ACTUAL Aug-18	0	30	0	18	48	0	154	48	33	0	0	1	14	5,582	815,131	11.78	7.36	7.4	37.8	
ACTUAL Sep-18	0	31	0	18	49	0	193	49	34	1	0	0	14	5,572	911,732	10.75	6.80	6.8	42.3	
ACTUAL Oct-18	0	31	0	15	46	0	221	46	32	0	2	0	12	5,530	985,268	9.34	6.29	6.3	44.9	
ACTUAL Nov-18	0	23	0	17	40	0	161	40	31	0	0	1	4	5,475	611,429	13.08	7.52	7.5	52.7	
ACTUAL Dec-18	0	25	0	13	38	0	157	38	24	1	0	0	9	5,493	751,959	10.11	6.65	6.6	41.8	
ACTUAL Jan-19	0	25	0	12	37	0	139	37	25	0	0	0	11	5,392	692,941	10.84	7.32	7.3	40.7	
ACTUAL Feb-19	0	27	0	13	40	0	151	40	23	0	1	0	15	5,396	882,585	11.72	7.91	7.9	44.2	
ACTUAL Mar-19	0	24	0	16	40	0	153	40	27	0	0	1	12	5,376	672,655	11.89	7.14	7.1	45.5	
ACTUAL Apr-19	0	29	0	8	37	0	166	37	20	1	1	0	15	5,346	832,723	8.89	6.97	7.0	39.9	
ACTUAL May-19	0	24	0	20	44	0	125	44	24	1	2	0	16	5,324	912,704	9.64	5.26	5.3	27.4	
ACTUAL Jun-19	0	22	1	25	48	8	135	48	27	2	8	0	8	5,300	844,131	11.37	5.21	5.4	32.0	
ACTUAL Jul-19	0	26	0	8	34	0	118	34	27	0	0	0	7	5,306	816,701	8.33	6.37	6.4	28.9	
ACTUAL Aug-19	0	28	0	18	46	0	190	46	33	0	0	2	11	5,324	735,206	12.51	7.62	7.6	51.7	
ACTUAL Sep-19	0	28	0	14	42	1	146	42	32	0	0	0	9	5,562	864,380	9.72	6.48	6.5	33.8	
ACTUAL Oct-19	0	23	0	12	35	0	124	35	26	0	0	0	9	5,351	898,439	7.79	5.12	5.1	27.6	
ACTUAL Nov-19	0	14	0	9	23	0	81	23	16	1	0	0	6	5,321	704,060	6.53	3.98	4.0	23.0	
ACTUAL Dec-19	0	17	0	6	23	0	93	23	13	0	1	0	4	5,306	745,096	6.17	4.56	4.6	25.0	
ACTUAL Jan-20	0	21	0	13	34	0	138	34	28	0	0	0	9	5,270	653,405	10.33	6.38	6.4	41.9	
ACTUAL Feb-20	0	18	0	6	24	0	88	24	13	0	0	0	3	5,270	868,645	5.63	4.14	4.1	20.3	
ACTUAL Mar-20	0	16	0	0	16	0	171	16	15	0	0	0	1	5,245	669,068	4.78	4.78	4.8	51.1	
ACTUAL Apr-20	0	1	0	0	1	0	15	1	1	0	0	0	0	3,297	421,950	0.47	0.47	0.5	7.1	
ACTUAL May-20	0	2	0	2	4	0	17	4	4	0	0	0	0	3,297	421,950	1.90	0.95	0.9	8.1	
ACTUAL Jun-20	0	6	0	1	7	0	118	7	7	0	0	0	0	4,655	582,650	2.40	2.06	2.1	40.5	
ACTUAL Jul-20	0	4	0	0	4	0	40	4	4	0	0	0	0	5,199	674,264	1.19	1.19	1.2	11.9	
ACTUAL Aug-20	0	6	0	0	6	0	58	6	6	0	0	0	0	5,213	942,967	1.27	1.27	1.3	12.3	
ACTUAL Sep-20	0	5	0	0	5	0	33	5	4	0	0	0	1	5,194	882,042	1.13	1.13	1.1	7.5	
ACTUAL Oct-20	0	10	0	0	10	0	95	10	10	0	0	0	0	5,154	882,553	2.27	2.27	2.3	21.5	
ACTUAL Nov-20	0	4	0	1	5	0	40	5	4	0	0	0	1	5,074	793,957	1.26	1.01	1.0	10.1	
ACTUAL Dec-20	0	5	0	1	6	0	36	6	4	0	0	0	1	5,005	682,564	2.05	1.47	1.5	27.3	
ACTUAL Jan-21	0	5	0	1	6	0	36	6	4	0	0	0	1	5,095	741,096	1.62	1.35	1.3	9.7	
ACTUAL Feb-21	0	18	0	6	24	0	98	24	21	0	0	0	3	5,270	868,645	5.63	4.14	4.1	20.3	
ACTUAL Mar-21	0	16	0	0	16	0	171	16	15	0	0	0	1	5,245	669,068	4.78	4.78	4.8	51.1	
ACTUAL Apr-21	0	1	0	0	1	0	15	1	1	0	0	0	0	3,297	421,950	0.47	0.47	0.5	7.1	
ACTUAL May-21	0	2	0	2	4	0	17	4	4	0	0	0	0	3,297	421,950	1.90	0.95	0.9	8.1	
ACTUAL Jun-21	0	6	0	1	7	0	118	7	7	0	0	0	0	4,655	582,650	2.40				

Historial de Lesiones y Enfermedades Registables

1,159

Tables

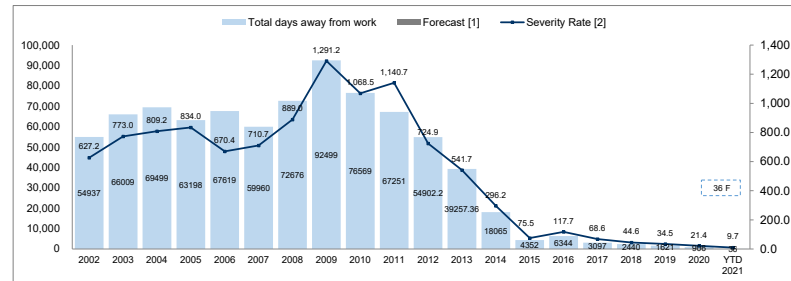
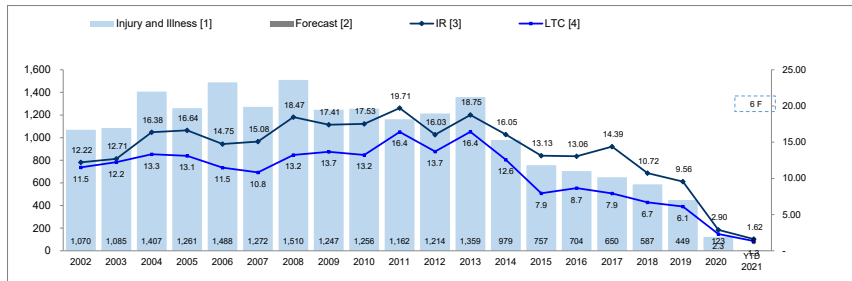
	Total days away from work		Injury and illness [1]		Total worked hours		IR [3]	LTC [4]	Severity Rate [2]
	Actuals	Forecast [1]	Actuals	Forecast [2]	Actuals	Forecast [1]			
2002	54,937	0	1,070	0	17,517,698	0	12.22	11.5	627.2
2003	66,009	0	1,085	0	17,078,683	0	12.71	12.2	773.0
2004	69,499	0	1,407	0	17,177,387	0	16.38	13.3	809.2
2005	63,198	0	1,261	0	15,155,505	0	16.64	13.1	834.0
2006	67,519	0	1,488	0	20,173,877	0	14.75	11.5	670.4
2007	59,960	0	1,272	0	16,873,417	0	15.08	10.8	710.7
2008	72,576	0	1,510	0	16,350,798	0	18.47	13.2	889.0
2009	92,499	0	1,247	0	14,327,982	0	17.41	13.7	1,291.2
2010	76,569	0	1,256	0	14,331,597	0	17.53	13.2	1,068.5
2011	67,251	0	1,162	0	11,791,281	0	19.71	16.4	1,140.7
2012	54,902	0	1,214	0	15,146,976	0	16.03	13.7	724.9
2013	39,257	0	1,359	0	14,493,599	0	18.75	16.4	541.7
2014	18,065	0	979	0	12,197,587	0	16.05	12.6	296.2
2015	4,352	0	757	0	11,527,910	0	13.13	7.9	75.5
2016	6,344	0	704	0	10,782,452	0	13.06	8.7	117.7
2017	3,097	0	650	0	9,032,998	0	14.39	7.9	68.6
2018	2,440	0	587	0	10,950,167	0	10.72	6.7	44.6
2019	1,621	0	449	0	9,391,621	0	9.56	6.1	34.5
2020	906	0	123	0	8,481,105	0	2.90	2.3	21.4
YTD 2021	36	0	6	0	741,096	0	1.62	1.3	9.7

Number of Incidents and Incident Rates - Forecast

Number of Days Away From Work - Forecast

IR: For every 100 employees, 14.4 have been involved in a recordable injury or illness.
 LTCR: For every 100 employees, 7.9 have suffered lost time because of a work related injury or illness.

Severity Rate: For every recordable incident at PREPA, an average of 68.6 days will be lost due to those work related injuries and illnesses in 2015



[1] Includes: general injuries, skin disorders, respiratory conditions, poisoning and hearing loss.

[2] Forecast: Maximum monthly injuries and illnesses in 2016. Number of employees is assumed to be constant using 2015 monthly average numbers throughout the rest of the year.

[3] OSHA Recordable Incident Rate (IR) is calculated by multiplying the number of recordable cases by 200,000, and then dividing that number by the number of total labor hours.

[4] The Lost Time Case Rate (LTCR) is a similar calculation, only it uses the number of cases that contained lost work days.

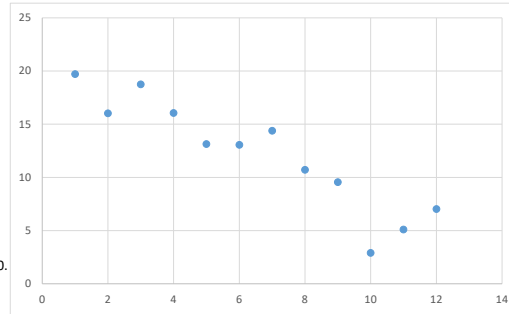
[1] Forecast: Average monthly number of days away from work from 2014 is used to calculate the remaining 2015 months.

[2] The severity rate is a calculation that gives a company an average of the number of lost days per recordable incident. Please note, that it only provides an average. The calculation is made by dividing the total lost workdays by the number of incidents.

Annual Incident Rate Forecast 2021

Year	Incident Rate
2011	19.70947855
2012	16.02960221
2013	18.75310583
2014	16.05235558
2015	13.13334333
2016	13.05825428
2017	14.39167833
2018	10.72129776
2019	9.561715067
2020	2.900565433
2021	5.098605832
2021	7.034842122

Forecast including year 2020.
Forecast not including year 2020.



Monthly Incident Rate Forecast 2021

Month	Incident RATE
Jan-17	13.92333235
Feb-17	12.90193077
Mar-17	12.48288719
Apr-17	12.84022444
May-17	20.25654169
Jun-17	17.59394768
Jul-17	16.41449846
Aug-17	14.98853052
Sep-17	5.796006337
Oct-17	4.508928383
Nov-17	5.598723491
Dec-17	9.000967604
Jan-18	6.794764149
Feb-18	13.65351192
Mar-18	11.50104192
Apr-18	12.32682411
May-18	9.14526557
Jun-18	10.34163909
Jul-18	11.24635258
Aug-18	11.77724807
Sep-18	10.74877267
Oct-18	9.337560948
Nov-18	13.08410298
Dec-18	10.10693402
Jan-19	10.83549611
Feb-19	11.72015207
Mar-19	11.8931696
Apr-19	8.886508479
May-19	9.641680107
Jun-19	11.3726424
Jul-19	8.326180573
Aug-19	12.51349962
Sep-19	9.717948125
Oct-19	7.79129134
Nov-19	6.533534074
Dec-19	6.173701107
Jan-20	10.32657803
Feb-20	5.525847728
Mar-20	4.782772454
Apr-20	0.473989809
May-20	1.895959237
Jun-20	2.402814726
Jul-20	1.186478887
Aug-20	1.272578998
Sep-20	1.133732861
Oct-20	2.266152854
Nov-20	1.259514054
Dec-20	2.051089715
Jan-21	1.619224513

	2017	2018	2019	2020	Monthly Forecast 2021
January	13.92333	6.794764	10.8355	10.32658	6.415817287
February	12.90193	13.65351	11.72015	5.525848	4.603447062
March	12.48289	11.50104	11.89317	4.782772	4.414607189
April	12.84022	12.32682	8.886508	0.47399	5.232541613
May	20.25654	9.145266	9.64168	1.895959	5.734087002
June	17.59395	10.34164	11.37264	2.402815	4.158164373
July	16.4145	11.24635	8.326181	1.186479	1.793921125
August	14.98853	11.77725	12.5135	1.272579	6.127570304
Septembre	5.796006	10.74877	9.717948	1.133733	8.99833361
October	4.508928	9.337561	7.791291	2.266153	7.026961475
November	5.598723	13.0841	6.533534	1.259514	9.865098833
December	9.000968	10.10693	6.173701	2.05109	3.865477349

Incident Rate 5.686335602