

NEPR

Received:

May 28, 2021

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

IN RE: REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY'S  
PHYSICAL SECURITY PLAN

**CASE NO. NEPR-MI-2020-0018**

SUBJECT: LUMA's Physical Security  
Plan.

**MOTION SUBMITTING LUMA'S PHYSICAL SECURITY PLAN**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy, LLC** ("ManagementCo")<sup>1</sup>, and **LUMA Energy ServCo, LLC** ("ServCo")<sup>2</sup>, (jointly referred to as "LUMA"), through the undersigned counsel and respectfully submit LUMA's Physical Security Plan:

**I. Introduction**

LUMA entered into the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020 (the "OMA"), with the Puerto Rico Electric Power Authority ("PREPA") and the Puerto Rico Public-Private Partnerships Authority ("P3 Authority") to (i) provide management, operation, maintenance, repair, restoration and replacement, and other related services for the transmission and distribution system ("T&D System"), in each case that are customary and appropriate for a utility transmission and distribution system service provider, and (ii) establish policies, programs and procedures with respect thereto ([i] and [ii], collectively), the "O&M Services") . . . ." See OMA Section 5.1.<sup>3</sup> The O&M Services

<sup>1</sup> Register No. 439372.

<sup>2</sup> Register No. 439373.

<sup>3</sup> The OMA further provides that, except for those rights and responsibilities reserved for PREPA and the P3 Authority or otherwise expressly provided in the OMA, LUMA "shall (A) be entitled to exercise all of

are to be provided in accordance with the “Contract Standards,”<sup>4</sup> requiring compliance with Applicable Law<sup>5</sup>, Prudent Utility Practice<sup>6</sup>, and other standards, terms, conditions and requirements specified in the OMA. Contract Standards necessarily require acting consistently with policy mandates and directives in Act 57-2014, as amended, known as the “Puerto Rico Energy Transformation and Relief Act” (“Act 57-2014”), Act 120-2018, as amended, known as the “Electric Power System Transformation Act” (“Act 120-2018”) and Act 17-2019, known as the “Puerto Rico Energy Public Policy Act” (“Act 17-2019”), among others.

The O&M Services are to commence on a date referred to as the “Service Commencement Date,” or the “Interim Period Service Commencement Date” if PREPA remains in Title III bankruptcy proceeding, and certain conditions precedent specified under the OMA are satisfied or waived (collectively, for purposes of this Motion, the “Commencement Date”).<sup>7</sup> *See Id.*, Sections

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the rights and perform the responsibilities of [PREPA] in providing the O&M Services, and (B) have the autonomy and responsibility to operate and maintain the T&D System and establish the related plans, policies, procedures and programs with respect thereto as provided in [the OMA].” *Id.* Moreover, the OMA provides that LUMA shall function as agent of [PREPA] and PREPA “irrevocably authorizes [LUMA] to (i) represent [PREPA] before [the Energy Bureau] with respect to any matter related to the performance of any O&M Services provided by [LUMA] under [the OMA]” and “(ii) prepare all related filings and other submissions before [the Energy Bureau]” among other functions. OMA, Section 5.6.

<sup>4</sup> The OMA defines “Contract Standards” as “the terms, conditions, methods, techniques, practices and standards imposed or required by: (i) Applicable Law; (ii) Prudent Utility Practice; (iii) applicable equipment manufacturer’s specifications and reasonable recommendations; (iv) applicable insurance requirements under any insurance procured pursuant to this Agreement; (v) the Procurement Manuals, as applicable, and (vi) any other standard, term, condition or requirement specifically contracted in this Agreement to be observed by [LUMA].” *Id.* Section 1.1 at page 9.

<sup>5</sup> This term includes “any foreign, national, federal, state, Commonwealth, municipal or local law, constitution, treaty, convention, statute, ordinance, code, rule, regulation, common law, case law or other similar requirement enacted, adopted, promulgated or applied by any [governmental body][...]” in each case applicable to the parties to the OMA. *Id.*, Section 1.1 at page 3.

<sup>6</sup> “Prudent Utility Practice” is defined, in pertinent part, as “...at any particular time, the practices, methods, techniques, conduct and acts that, at the time they are employed, are generally recognized and accepted by companies operating in the United States electric transmission and distribution business as such practices, methods, techniques, conduct and acts appropriate to the operation, maintenance, repair and replacement of assets, facilities and properties of the type covered by the [OMA] . . . .” *Id.* at page 26.

<sup>7</sup> LUMA is assuming that PREPA will not exit the Title III Bankruptcy proceeding before June 1, 2021. Consistent with statements from the Executive Director of Financial Oversight and Management Board (FOMB) and PREPA Certified Fiscal Plan for FY2021, certified on June 29, 2020, the Initial Budgets

4.5 and 4.7(b). Beginning on the Effective Date (that is, June 22, 2020) and until Commencement Date<sup>8</sup> (this period, the “Front-End Transition Period”), LUMA is required to provide “Front-End Transition Services”<sup>9</sup> which are “intended to ensure an orderly transition of the responsibility for the management, operation, maintenance, repairs, restoration and replacement of the T&D System to [LUMA] by the . . . [Commencement Date], without disruption of customer service and business continuity . . . .” OMA, Sections 1.1 at page 15 and Section 4.1(a).<sup>10</sup>

Prior to Commencement Date, LUMA shall develop and provide the P3 Authority and this Bureau for their information, a plan meeting Contract Standards that outlines the procedures and actions necessary for maintaining the physical security of the T&D System after Commencement Date (the “Physical Security Plan”). OMA Section 4.2 (h). The Physical Security Plan shall be effective on Commencement Date, “as long as...the Physical Security Plan...[is] substantially complete on . . . Commencement Date. Its finalization shall not delay . . . Commencement Date

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assume that PREPA will exit Title III at December 31, 2021. *See e.g.*, “Natalie Jaresko: “we are going to emerge from bankruptcy in 2021”, PR Headline News, <https://www.puertoricoheadlinenews.com/natalie-jaresko-we-are-going-to-emerge-from-bankruptcy-in-2021/> (last visited February 22, 2021). Consequently, LUMA anticipates providing the O&M Services during the Interim Period pursuant to the Supplemental Terms Agreement agreed between the OMA parties precisely for this contingency. If PREPA exits the Title III bankruptcy proceeding contemporaneously with all other conditions precedent to Service Commencement Date, then LUMA will begin providing O&M Services without the need for an “interim period.” Mentions in this document (and in all other OMA required submittals to the Energy Bureau), to “beginning of O&M Services,” “start of operations,” “start of operations and maintenance services,” and other allusions of similar import, shall be understood to refer to the end of the Front-End Transition Period and LUMA’s commencement of O&M Services regardless of whether it is in under an “interim period” or after full “Service Commencement Date.”

<sup>8</sup> *See Id.*

<sup>9</sup> The Front-End Transition Services are defined in the OMA as services to “complete the transition and handover to [LUMA] of the operation, management and other rights and responsibilities with respect to the T&D System pursuant to [the OMA], including the services contemplated by the Front-End Transition Plan; provided that the Front-End Transition Services shall not be O&M Services.”<sup>9</sup> *Id.*, Section 1.1 at page 16.

<sup>10</sup> Although both ManagementCo and ServCo constitute the Operator under the OMA, after the Commencement Date, ServCo will provide the vast majority of the O&M Services while ManagementCo’s role will be mainly providing oversight and management of ServCo.

from occurring if all other Service Commencement Date Conditions have been satisfied or waived.”  
*See Id.*

Upon Service Commencement and as part of the O&M Services, LUMA is responsible for, among others, “managing and maintaining 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,” including the “T&D System Security in accordance with Applicable Law and to protect the T&D System from vandalism, terrorism or other acts.” *Id.* Annex I, Section II, at page I-4. LUMA shall also “develop[] and maintain[] a physical security program in accordance with Prudent Utility Practice and other application regulations/law for the protection of the T&D System critical infrastructure, other assets and persons.” *Id.* Annex I, Section VIII B, at page I-13 (item 7). Additionally, LUMA shall implement the Physical Security Plan and “guard against and be responsible for all physical damage to the T&D System caused by trespass, theft, negligence, vandalism, malicious mischief or cyber-attacks of third-parties.” OMA, Section 5.7 (c). “The Physical Security Plan shall be updated by [LUMA] from time to time as necessary and appropriate.” *Id.*

During the Front-End Transition Period, LUMA completed a gap assessment that identified several deficiencies regarding physical security from both process and asset condition-based perspectives that need to be corrected. Sections 4.0 and 4.1 of the Physical Security Plan detail specific deficiencies in PREPA’s current physical security. The substantive contents of that assessment, as well as the Physical Security Plan, are confidential as per the Bureau’s Resolution and Order issued in this proceeding on December 31, 2021 (“December 31<sup>st</sup> Resolution and Order”), pursuant to which proceedings are conducted confidentially.

Addressing the deficiencies requires a three-phased approach to ensure the minimum physical security requirements are met. *Id.* Section 6.0. Four programs in the System Remediation Plan and the Initial Budgets filings were conceptualized to support the Physical Security Plan, to wit, Physical Security for Distribution Facilities, Regional and Technical Facilities Security, Warehouse Security and Transmission Substation Security. *See* Initial Budgets filed in Case No. NEPR MI-2021-004 and System Remediation Plan filed in Case No. NEPR-MI-2019-0019.

The Physical Security Plan that is submitted confidentially with this Energy Bureau, is designed to implement and maintain a physical security program in accordance with Prudent Utility Practice and Applicable Laws to protect the T&D System's critical infrastructure, other assets and persons. The Physical Security Plan will implement data-driven methodologies to efficiently manage physical security and optimize trade-offs between cost, performance and risk. *See* Physical Security Plan, Section 2.1. LUMA seeks a physical security culture that will safeguard physical assets from trespass, theft, damage to property and negligence, and provide a safe and secure environment to operate the electric power grid. *Id.*

The Physical Security Plan will adopt the following industry guidelines, where applicable:

- Institute of Electrical and Electronics Engineering (IEEE);
- North American Electric Reliability Corporation (NERC);
- United States Department of Agriculture (USDA);
- Rural Utilities Service (RUS); and
- National Electric Safety Code (NESC).

*See* Section 3.0 of the Physical Security Plan.

As will be explained in the body of this Motion, the Physical Security Plan meets Act 17's public policy objectives to provide safe, efficient, stable and reliable power services in Puerto Rico

and a better quality of life for Puerto Ricans. The Physical Security Plan is aligned with LUMA's missions and goals to: (i) prioritize safety; (ii) improve customer satisfaction; (iii) system rebuild and resiliency; and (iv) operational excellence (v) sustainable energy transformation. *See* Figure 1-1 of the Physical Security Plan. LUMA will review its physical security-related objectives to maintain alignment between its strategy and key goals and its overall approach to maintaining proper physical security. *See Id*, Section 3.0.

LUMA respectfully requests that this honorable Energy Bureau **receive and review** the proposed Physical Security Plan that is submitted today under seal of confidentiality.<sup>11</sup>

## **II. Energy Bureau's Authority**

As the main entity in charge of ensuring compliance with energy public policy and to carry out energy policy mandates, this honorable Bureau has authority to receive and review the Physical Security Plan pursuant to Act 57-2014 and Act 17-2019.

Act 57-2014 gives the Energy Bureau authority and regulatory oversight over electric services and electric power service companies<sup>12</sup>, such as PREPA and LUMA. *See* Act 57-2014 as amended by Act 17-2019, Sections 6.3 and 6.4, 22 LPRA § 1054b and c and §1054c. Among other powers, the Energy Bureau may establish public policy standards with respect to electric

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<sup>11</sup> At page 3 of the December 31<sup>st</sup> Resolution and Order issued in this proceeding, this Bureau state the following on confidentiality: "Given the nature of the information to be handled under the instant case, all proceedings and filing[s] are deemed confidential unless the Energy Bureau determines otherwise."

<sup>12</sup>Section 1.2 of Act 17-2019, defines "electric power service company" as:

any natural or juridical person or entity, including energy cooperatives, engaged in the rendering of energy generation, transmission, and distribution services, billing, wheeling, grid services, energy storage, the resale of electric power, as well as any other electric power service as defined by the Bureau. For purposes of this Act, the Electric Power Authority or its successor, as well as any electric power transmission and distribution network operator, shall be deemed to be an Electric Power Service Company.

22 LPRA §1141a(c).

power service companies, establish rates, regulate any transaction, action or omission in connection with the electric power grid and the electric power infrastructure, and exercise jurisdiction over claims filed against certified electric power companies. *See Id*, Sections 6.3 (a) and (c) and 6.4 (c). The Energy Bureau is also tasked with overseeing the quality, efficiency and reliability of electric power services provided by electric power companies certified in Puerto Rico, to guarantee a robust grid that serves the needs of the island. *See id*. Section 6.3 (d), of Act 57-2014, 22 LPRA §1054b. Finally, the Energy Bureau has authority to require that certified electric power service companies keep, maintain and file regularly with the Bureau those records, data, documents and plans that are necessary to implement Act 57-2014 as amended by Act 17-2019. *See id*. Section 6.3 (s) of Act 57-2014, 22 LPRA §1054b.

### **III. Public Policy**

Implementation of the Physical Security Plan will further various energy public policies objectives stated in Act 17-2019, including (1) “maintain[ing] the electric power structure in optimal conditions to ensure the reliability, resilience, and safety of the electric power service,” and ensuring that “electric power service providers . . . submit annual energy assurance plans, asset standardization plans, spare part inventories,” Act 17-2019, Art. 1.5(9)(e)); (2) ensuring “the security and reliability of [the] electric power system structure by using modern technologies that promote inexpensive and efficient operations . . . Act 17-2019, Art. 1.5(9)(a); (3) ensuring there is an ongoing planning, consultations, execution, evaluation and improvement processes in energy related matters Act 17-2019, Art. 1.5(9)(c); (4) ensuring that consumers receive reliable, stable, and excellent service at an accessible, just and reasonable cost, Act 17-2019, Sec. 1.5(10)(a); and (5) achieving continuous improvements for the electric power grid in

order to promote its resilience . . . .” Act 17-2019, Section 1.5(9)(f). 22 LPRA §1141d (codifying Act 17-2019 in Spanish).

The Physical Security Plan also considers the public policy principles of efficiency, quality and continuity set forth in Section 1.4 of Act 17-2019. 22 LPRA §1141(c).<sup>13</sup>

#### **IV. Bureau Resolution of December 31, 2020**

Pursuant to its authority under Acts 57-2014 and 17-2019, on December 31, 2020, this honorable Energy Bureau issued a Resolution and Order that initiated the captioned confidential proceeding to evaluate the Physical Security Plan that LUMA shall develop pursuant to Section 4.2(h) of the OMA. The December 31<sup>st</sup> Resolution and Order references Section 1.5 (9) of Act 17-2019 and the provisions of Section 4.2(h) of the OMA. *See* December 31<sup>st</sup> Resolution and Order at pages. 1-2.

In the December 31<sup>st</sup> Resolution and Order, this honorable Bureau stated that LUMA’s Physical Security Plan “shall be aligned with [five] principles beneficial to the public interests, including but not limited to . . .”: (1) Advance the Earlier Compliance with Public Policy; (2) Further Efficiencies and Savings; (3) Impact to Areas with Significant Issues; (4) Synergies; and (5) Benefits for the Public Interest. *Id* at pages 2-3. This honorable Bureau further directed that LUMA’s Physical Security Plan should be aligned with the public policies of Acts 57-2014 and

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<sup>13</sup> These principles provide the following:

- (i) The efficiency principle compels the correct allocation and use of resources to guarantee that services are rendered at the lowest possible cost and that resources which compose the Electrical System are developed according to the best industry practices;
- (ii) By virtue of the quality principle, electric power services rendered must meet the technical requirements and the reliability and quality standards established therefor;
- (iii) The continuity principle implies that services shall be rendered without interruptions, other than those programmed due to technical reasons, force majeure, or fortuitous events, or as a penalty when a customer fails to fulfill his obligations, and even in the event of bankruptcy, liquidation, audit, or substitution or termination of contracts entered into with the companies responsible for rendering such services[.]

22 LPRA §1141(c).



17-2019. *Id.* Finally, in the December 31<sup>st</sup> Resolution and Order this Bureau ordered that the Physical Security Plan “shall also show and discuss how it will take advantage of any previous plans done by PREPA . . . [,]” and ensure that duplicity of efforts, which result in imprudent costs, is avoided.” *Id.* at page 3.

As per the requirements of the December 31<sup>st</sup> Resolution and Order, on January 20, 2021, LUMA attended a Pre-Filing Technical Conference held via videoconference during which LUMA provided a presentation discussing its approach in preparing the Physical Security Plan and received input from this honorable Energy Bureau regarding the filing and contents of the same.<sup>14</sup>

#### **V. Hallmarks of the Physical Security Plan**

The overarching objective of the Physical Security Plan is to ensure the protection of the T&D System assets by applying comprehensive risk-based security strategies and developing cost-effective security solutions to mitigate risks. *See e.g.*, Physical Security Plan, Sections 1.0 and 2.0. To achieve this objective, the Physical Security Plan will be implemented in two steps: system remediation in five years and completion in ten years. *Id.* Section 1.0. LUMA will apply a diversified approach to physical security that includes an important component of security in facilities, but also extends to training and effective management of internal and outside security resources, adopting security standards, improving effectiveness and adequacy of IT/OT systems, improving security processes and ensuring that all LUMA employees adhere to applicable security processes and procedures. *See Id.*, Sections 2.2 and 3.0.

As detailed in Section 5.0 of the Physical Security Plan, physical protection is best achieved with a combination of deterrents and access control measures that include : (i) facility perimeter

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<sup>14</sup> LUMA filed with this Energy Bureau a confidential copy of its presentation. *See* LUMA’s “Motion in Compliance with Order Submitting LUMA’s Presentation Given at the Pre-Filing Technical Conference on January 20, 2021 and Submitting the Same Confidential Per the Energy Bureau’s Order on the Confidentiality of this Proceeding,” dated January 21, 2021.

protection; (ii) adequate lighting; (iii) intrusion detection systems; (iv) advanced facility access controls; and (v) adequate asset storage and usage procedures. They include:

Facility Perimeter Protection: with physical deterrents such as signage, fences and barriers to ensure the physical security of assets,

Security Lighting: to aid in the detection of intruders in low-light conditions and increasing visibility to raise employee safety,

Intrusion Detection System or alarm systems: to deter intruders, detect impending or actual security breaches, delay the activation of other systems such as locks, and respond to active intrusions,

Closed-Circuit Television System (CCTV): a deterrence and security tool to monitoring wide areas,

Facility Access Controls: use of access controls (such as biometrics or card access) for employees and contractors and visitors to ensure there are no un-authorized entries. Additionally, better use of locks and hardware will be required, and

Storage/Usage of Assets: strict compliance with storage and usage guidelines will be required of all authorized personnel.

*Id.* Section 5.0.

The Physical Security Plan is divided into three phases: (i) Phase 1 – Meeting Minimum Physical Security Requirements; (ii) Phase 2 – Implementing Physical Security Requirements; and (iii) Phase 3 – Achieving Physical Security Desired State. *Id.* Section 6.0, Figure 6-1 and Table 6-1. Section 6.3 of the Physical Security Plan outlines the near-term activities to be completed in the initial year following Commencement Date. As explained above, LUMA designed four program

briefs in its Initial Budgets and System Remediation Plan to support implementation of the Physical Security Plan. *See also* Physical Security Plan, Section 6.2.

The benefits of the Physical Security Plan are detailed in Table 6-4 of the Plan. Overall, the Physical Security Plan is an important element of LUMA's ability to harden the T&D System and support business continuity when faced with internal or external threats, vulnerabilities or natural disasters. *Id.* Section 6.4.

## **VI. LUMA's Physical Security Plan Complies with Statutory and Regulatory Requirements**

### **A. Consideration of PREPA's Current Management of Physical Security**

In preparing the Physical Security Plan, LUMA benefitted from the information gathered in the physical inspections of the T&D System and its assets. LUMA applied its collective knowledge of the industry, prudent utility practices, OMA requirements and applicable codes and standards to identify physical security related deficiencies across the PREPA organization. The findings of this analysis greatly informed the final Physical Security Plan. *See* Section 4.0 of the Physical Security Plan.

LUMA personnel issued an information request to PREPA on physical security. PREPA did not produce documentation. Thus, it is LUMA's understating that PREPA does not have a written physical security plan as the one being filed today with this Energy Bureau.

Implementation of the Physical Security Plan will consider works currently being performed by a PREPA contractor to repair fences and that are scheduled to conclude on June 30, 2021. LUMA will also leverage information contained in a draft scope of work prepared by Sargent & Lundy on Physical Security for Facilities.

## **B. Principles Beneficial to the Public Interest outlined in the December 31<sup>st</sup> Resolution and Order**

The Physical Security Plan is aligned with the following “principles beneficial to the public interest” listed in the Bureau’s December 31<sup>st</sup> Resolution and Order:

### **1. Advance the Earlier Compliance with Public Policy**

Development and adoption of a Physical Security Plan to guide LUMA’s efforts in providing safe, reliable and efficient electric power services is a decisive first step in achieving compliance with public policy goals and complies with Section 1.5 (9)(c) of Act 17-2019 on adoption of plans to meet policy requirements. The Physical Security Plan was developed to remedy gaps in physical security and, as such, furthers compliance with public policies on safety, resiliency, reliability and continuity of services. LUMA’s data driven approach will allow LUMA to track its progress in implementing security processes and procedures and identify any future necessity of amending the plan itself.

The Physical Security Plan is designed **to support provision of reliable and safe electric services by setting informed and measurable goals to protect critical infrastructures, assets and persons, based on an understating of the current state of the T& D assets** and the importance of physical security to remediate and harden the system and guarantee continuity of services. Early and prompt compliance with public policy will be achieved through planned processes and investments to protect T&D assets, employees and the general public.

Because the Physical Security Plan outlines short-term activities to be reached during the first year following Service Commencement, it is designed to facilitate early compliance with physical security goals related to the safe, reliable and efficient functioning of the electric power grid. Early compliance will also be fostered by investing on security for critical assets such as

distribution facilities, technical facilities, warehouses and transmission substations, as explained in Section 6.0 and Table 6-3 of the Physical Security Plan.

Employment of LUMA's subject-matter expertise will serve as a catalyst for earlier compliance with the public policy principle on quality of services as the Physical Security Plan will follow prudent utility and industry practices. *See* Act 17-2019, Section 1.4.

## **2. Further Efficiencies and Savings**

The Physical Security Plan leverages information on current security gaps and is aligned with LUMA's proposed investment programs as set forth in the Initial Budgets and System Remediation Plan. The Physical Security Plan will be implemented alongside other related policies and processes on business conduct, disclosure of information, property management and financial resources, and reach areas such as management of human resources, emergency response and business continuity. This integrated approach towards physical security will help ensure that proposed investments on physical security lead to savings.

As explained in Section 6.4 of the Physical Security Plan, LUMA expects to reduce costs incurred in private security services. Efficiencies will also be generated by leveraging the expertise and knowledge of LUMA's subject-matter experts and through implementation of data-driven methodologies. A culture of safety and security will be developed to ensure long-term efficiencies and mitigate risks.

## **3. Impact to areas with significant issues**

LUMA's Physical Security Plan is designed to achieve a level of continued improvement by addressing gaps in critical infrastructures and assets such as T&D substations, control centers, and warehouses, as explained in Sections 4.0 and 6.0 of the Physical Security Plan. LUMA will

address existing gaps to reduce safety risks that could imperil operations and lead to service interruptions.

#### **4. Synergies**

Synergies will be encouraged through an integrated implementation of the Physical Security Plan that considers the security needs of critical infrastructures and physical assets as well as the security of employees and the public. Implementation of the Physical Security Plan will be aligned with other programs and procedures, such as emergency response, business continuity plans and the System Remediation Plan. This integrated approach that involves several components of LUMA's operations and procedures related to security of the T&D System, will allow LUMA to meet the timelines set forth in the Physical Security Plan, including the one-year goals and the three-phased improvement plan that is outlined in Section 6.0 of the Physical Security Plan. The Physical Security Plan, in conjunction with the investment programs on physical security outlined in LUMA's Initial Budgets and System Remediation Plan, are designed to achieve the desired state explained at Figure 6-1 of the Physical Security Plan within budget projections.

#### **5. Benefits for the Public Interest**

As discussed in Section VI(B)(1) *supra*, the Physical Security Plan furthers important public policy mandates under Act 17-2019, including reliability, resiliency, safety and service continuity, all to benefit the public interest. *See Id.*, Section 4.2. Implementation of security procedures and processes that all of LUMA's employees shall follow will accrue benefits to all Puerto Ricans and will enable LUMA to deliver the safe and reliable services that public policy requires and that is key for societal well-being and economic development as required by Acts 57-2014 and 17-2019.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **consider and accept** the Physical Security Plan included as Exhibit 1 to this motion, **maintain** the Physical Security Plan under seal of confidentiality in alignment with the December 31<sup>st</sup> Resolution and Order that treats this proceeding as confidential, and **deem** that LUMA complied with the requirements of the Energy Bureau's Resolution and Order of December 31, 2020 in this proceeding.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 28<sup>th</sup> day of May 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](mailto:jmarrero@diazvaz.law); and Katiuska Bolaños-Lugo, [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law).



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*Exhibit 1*  
*LUMA's Physical Security Plan*

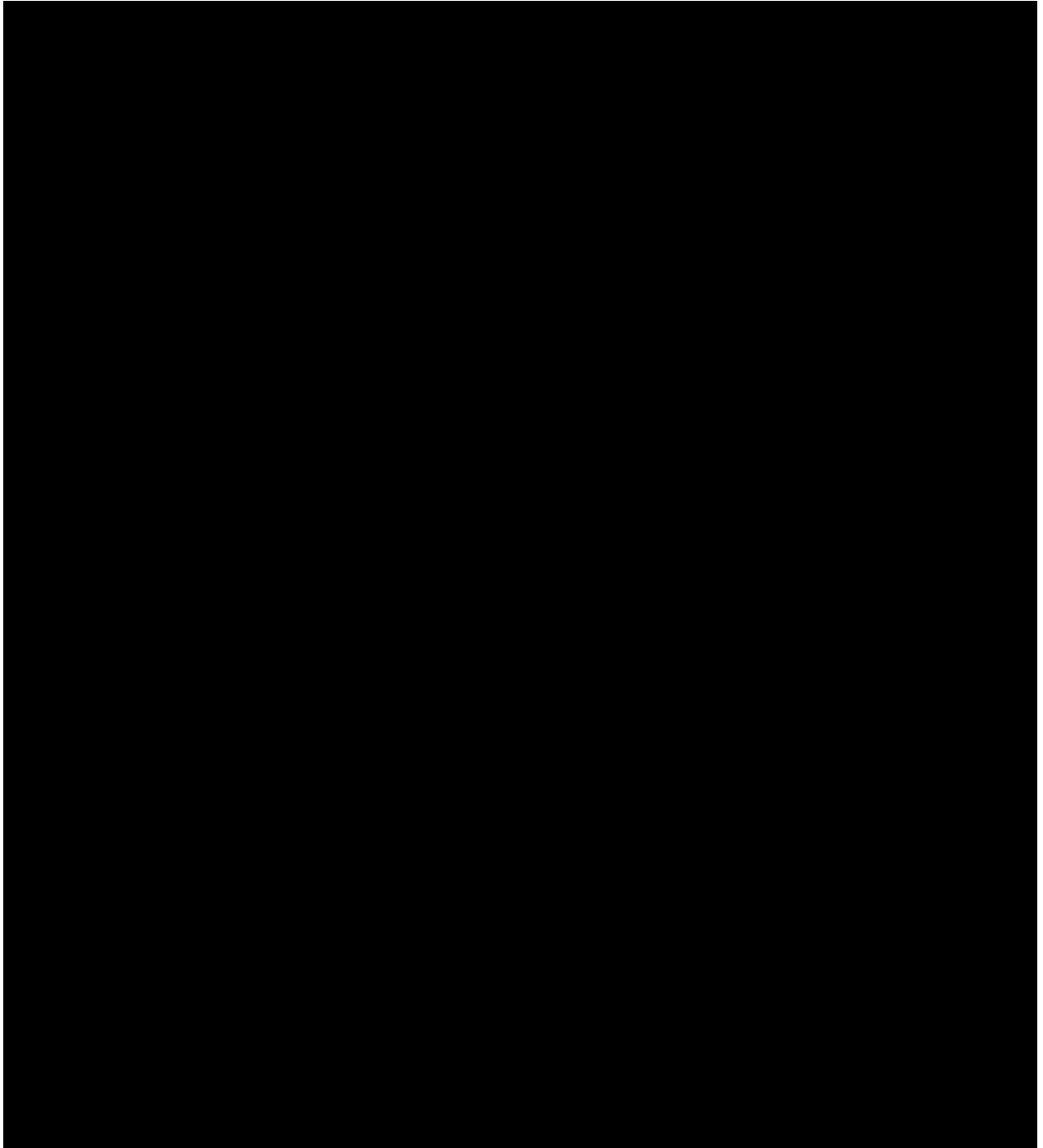




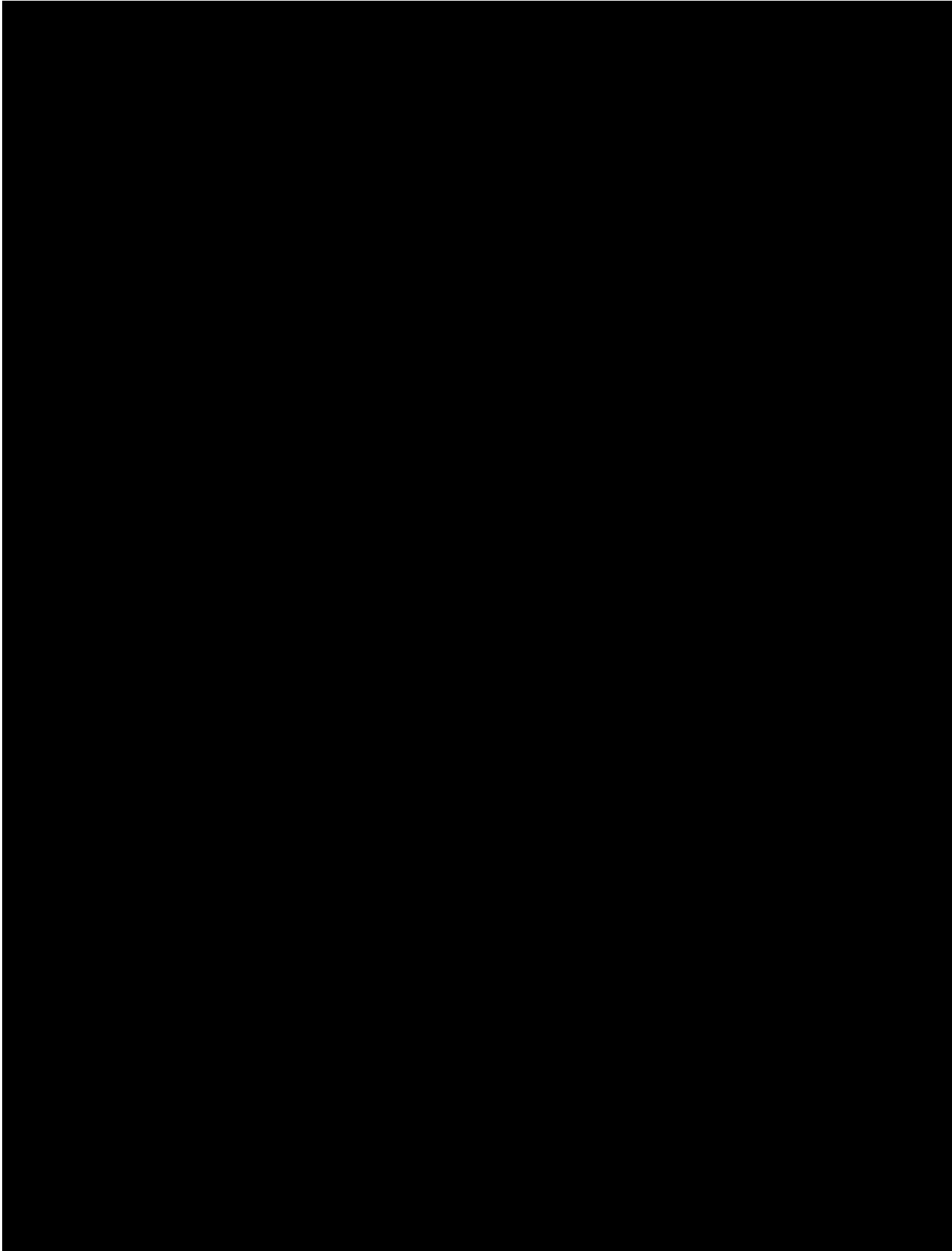
# Physical Security Plan

LUMA's Commencement Plan for Physical Security

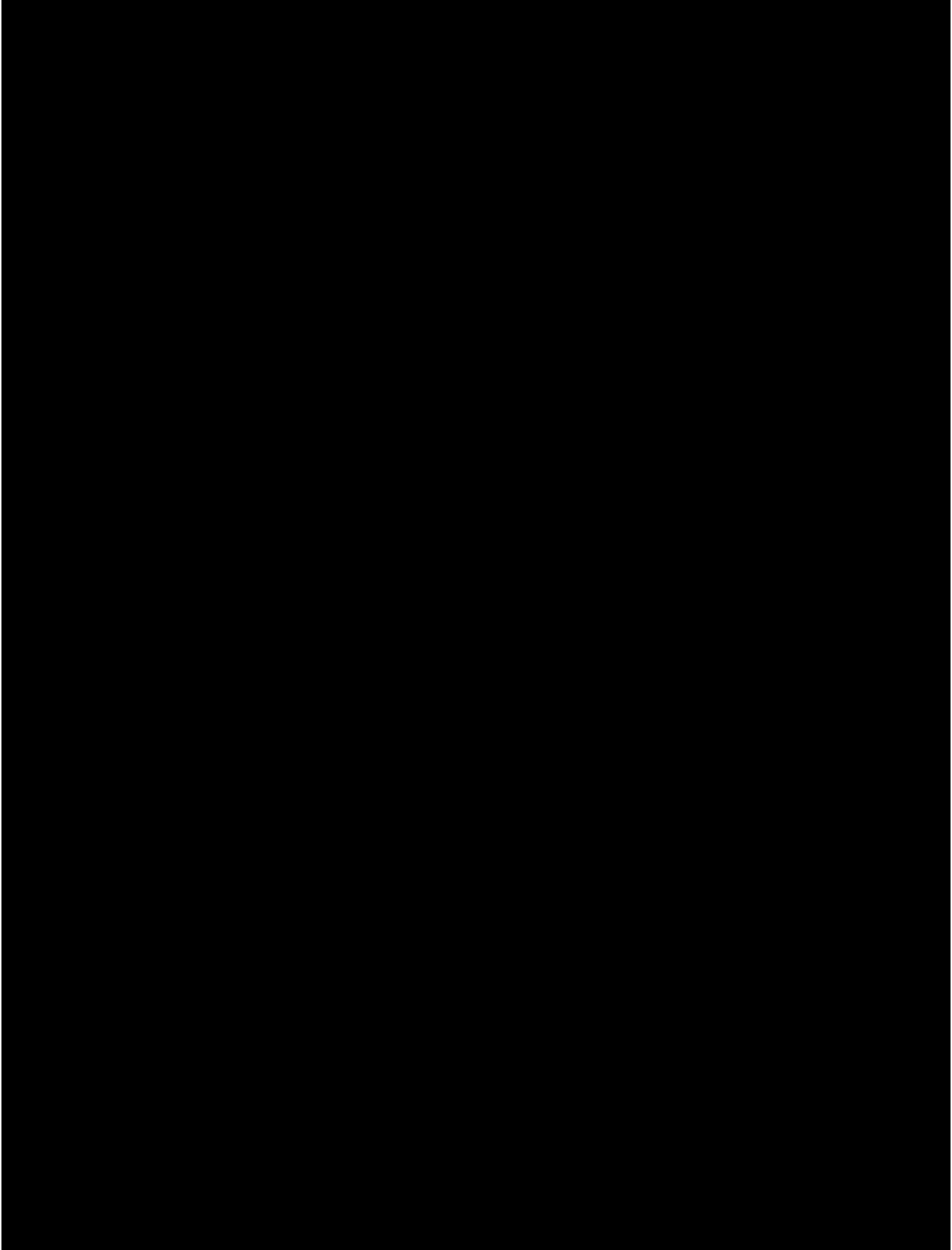
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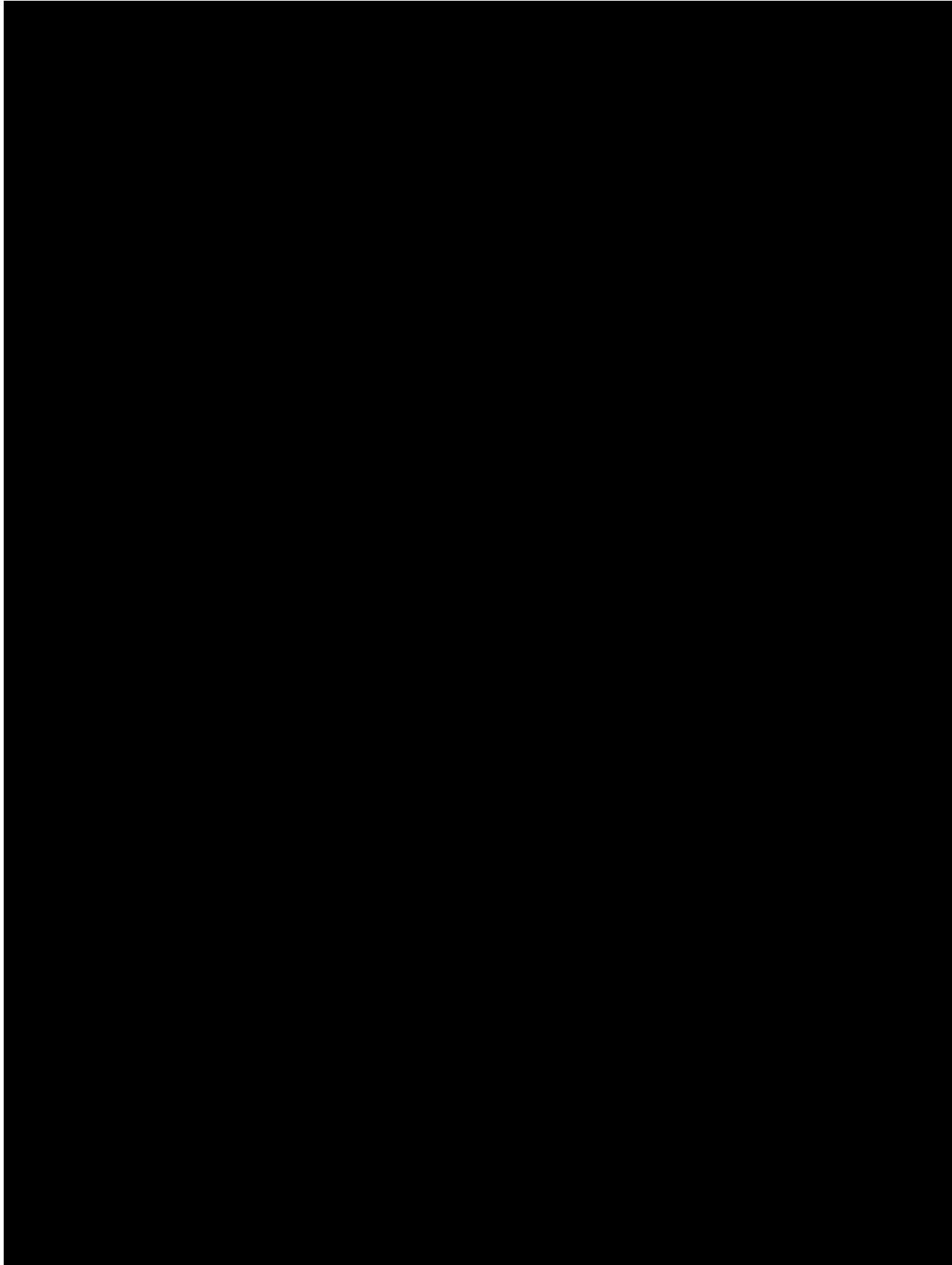
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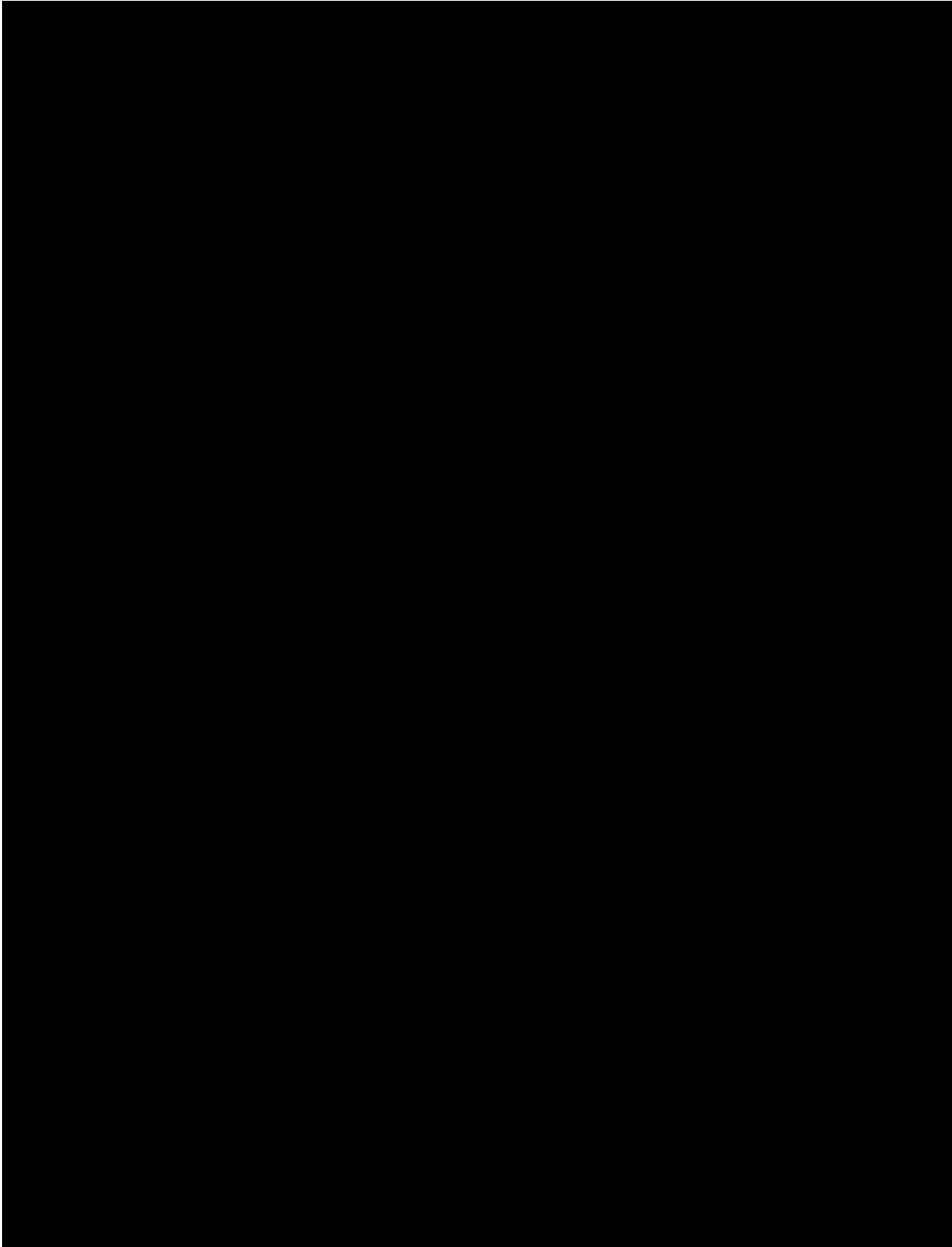
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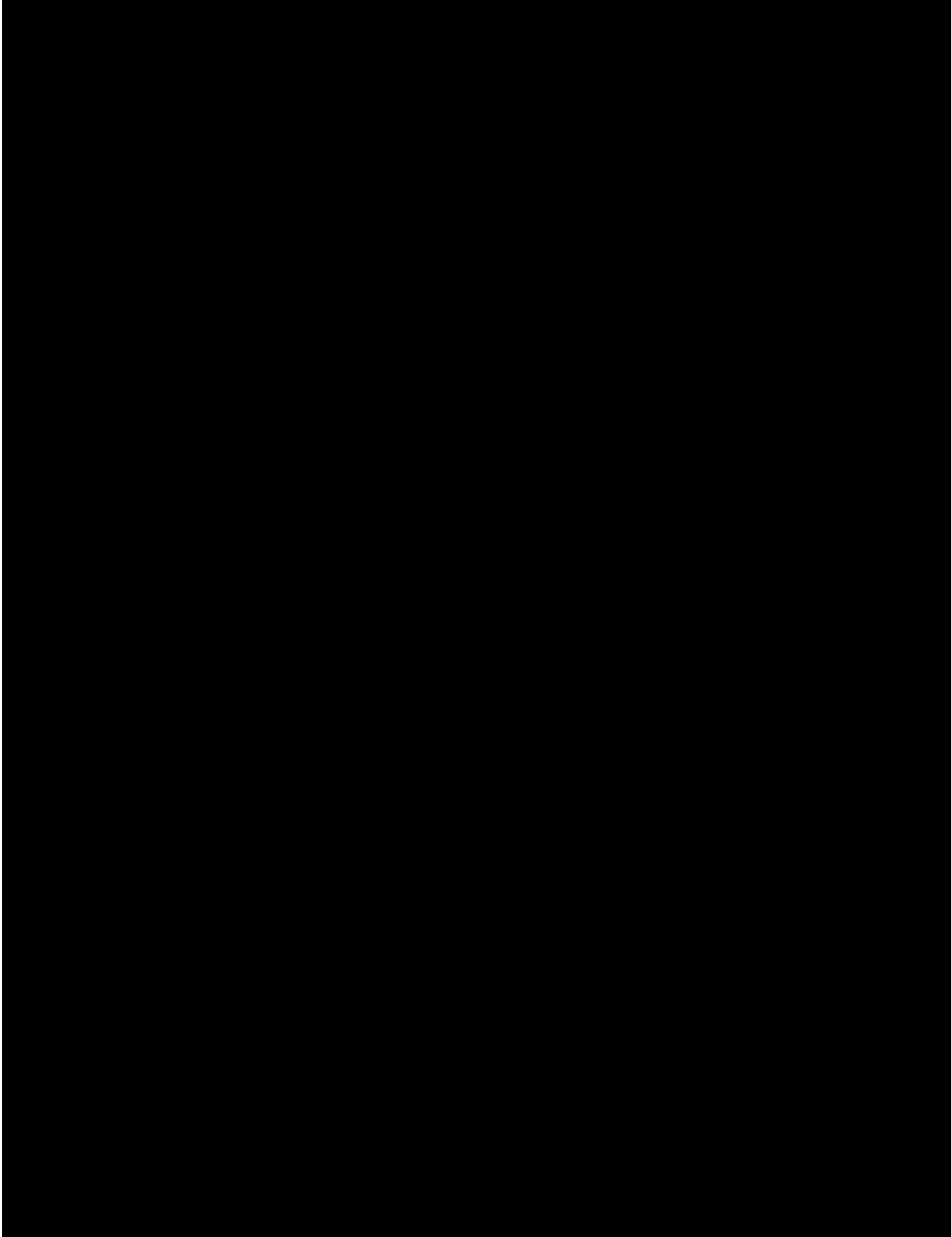
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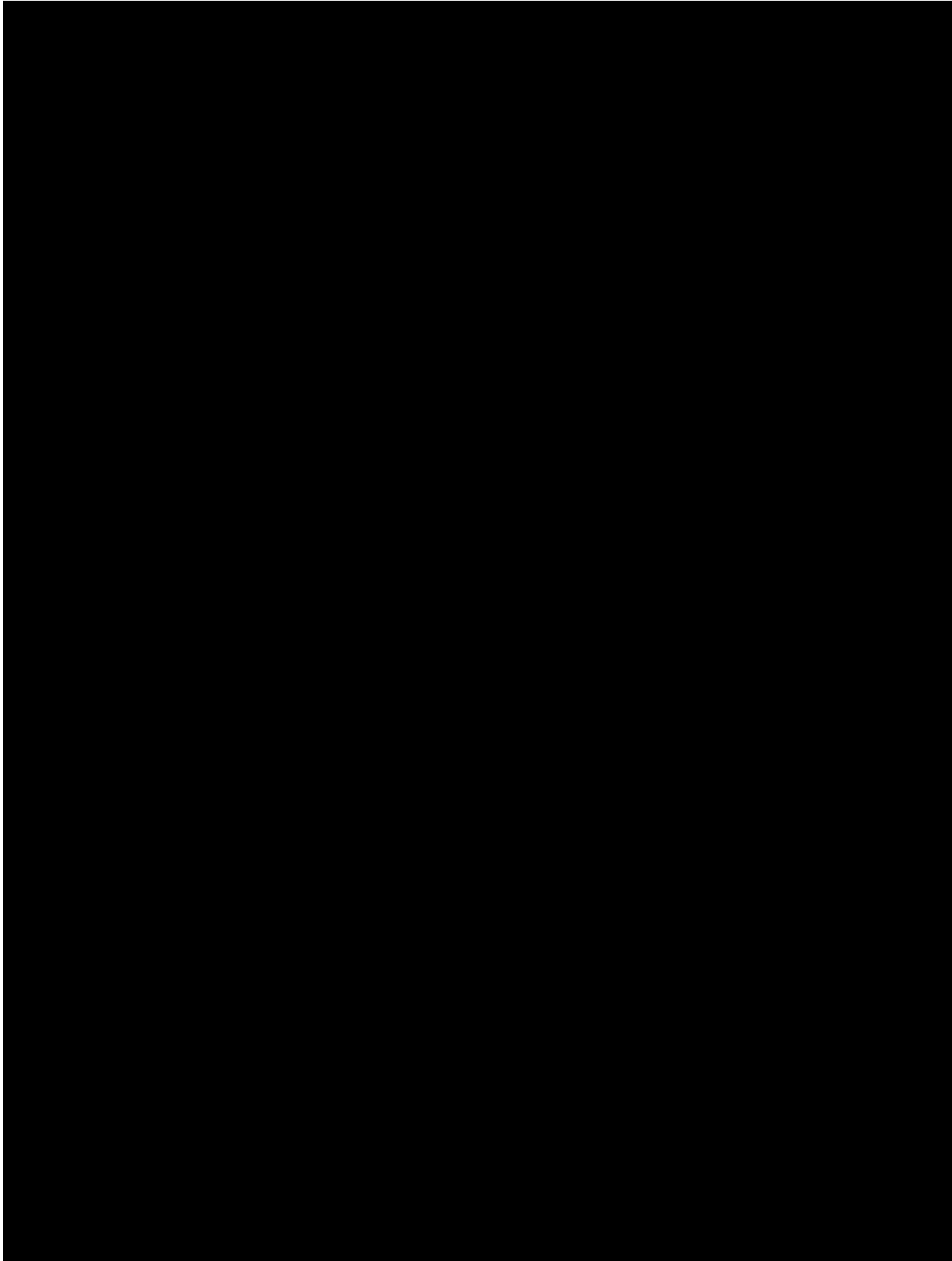
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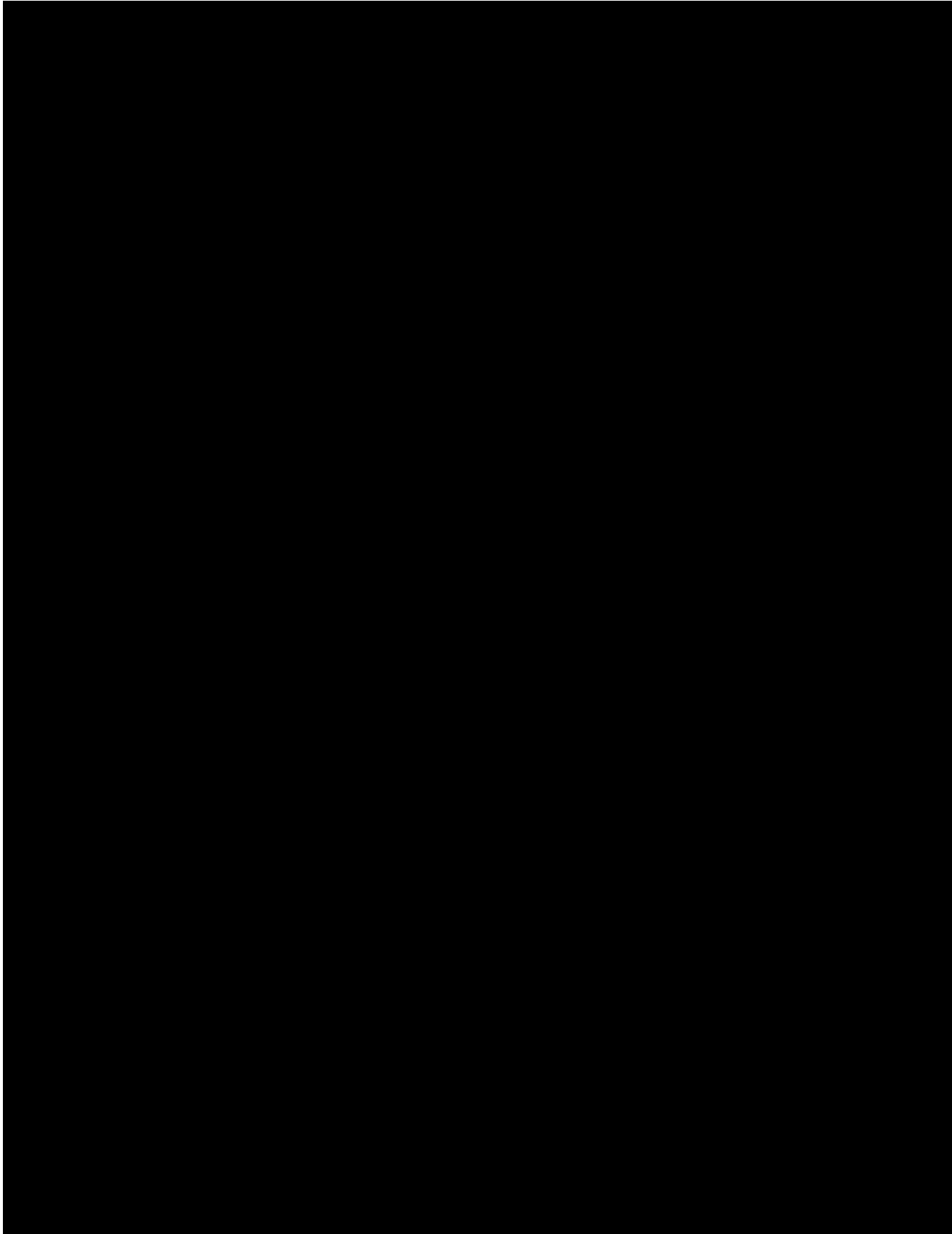


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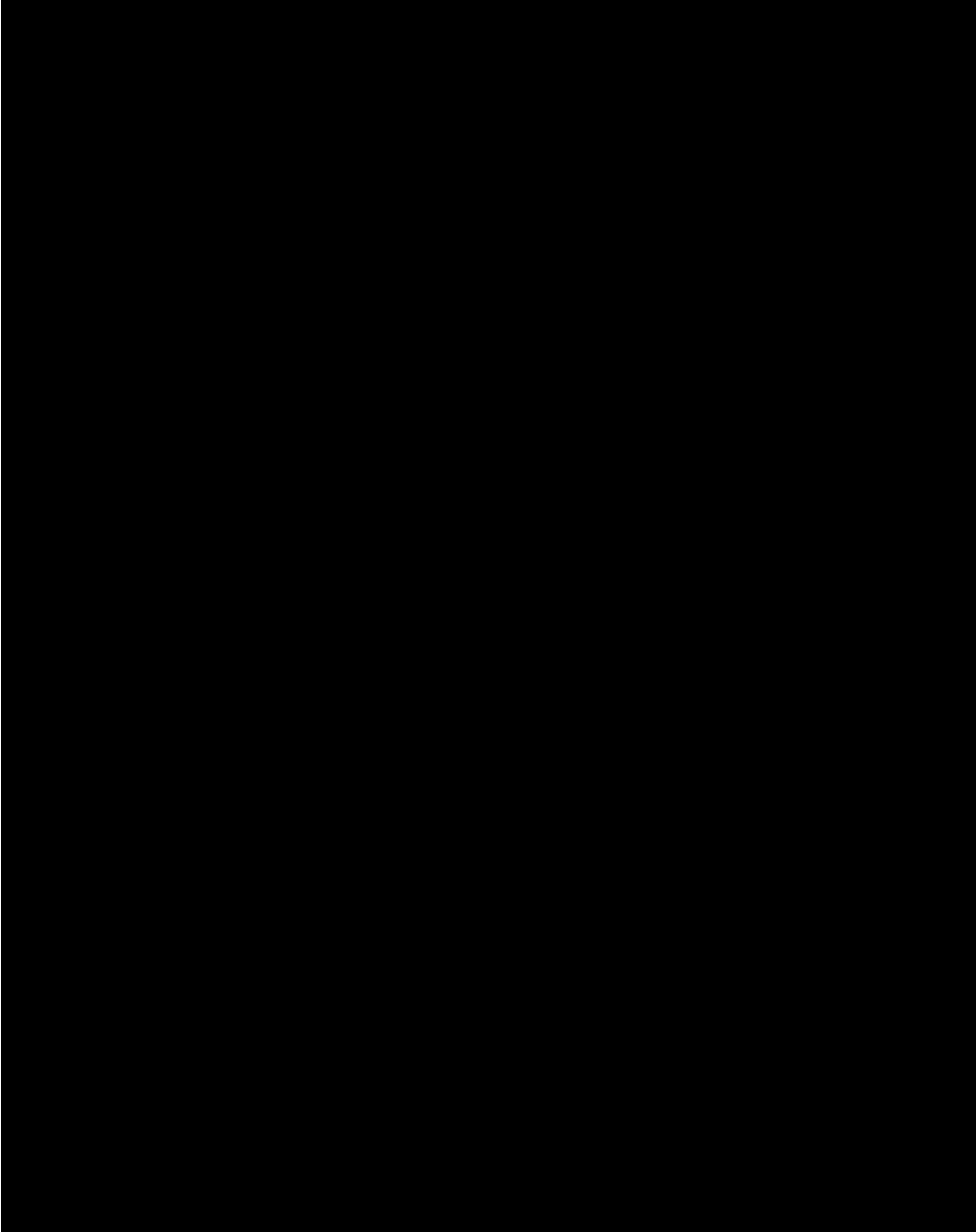




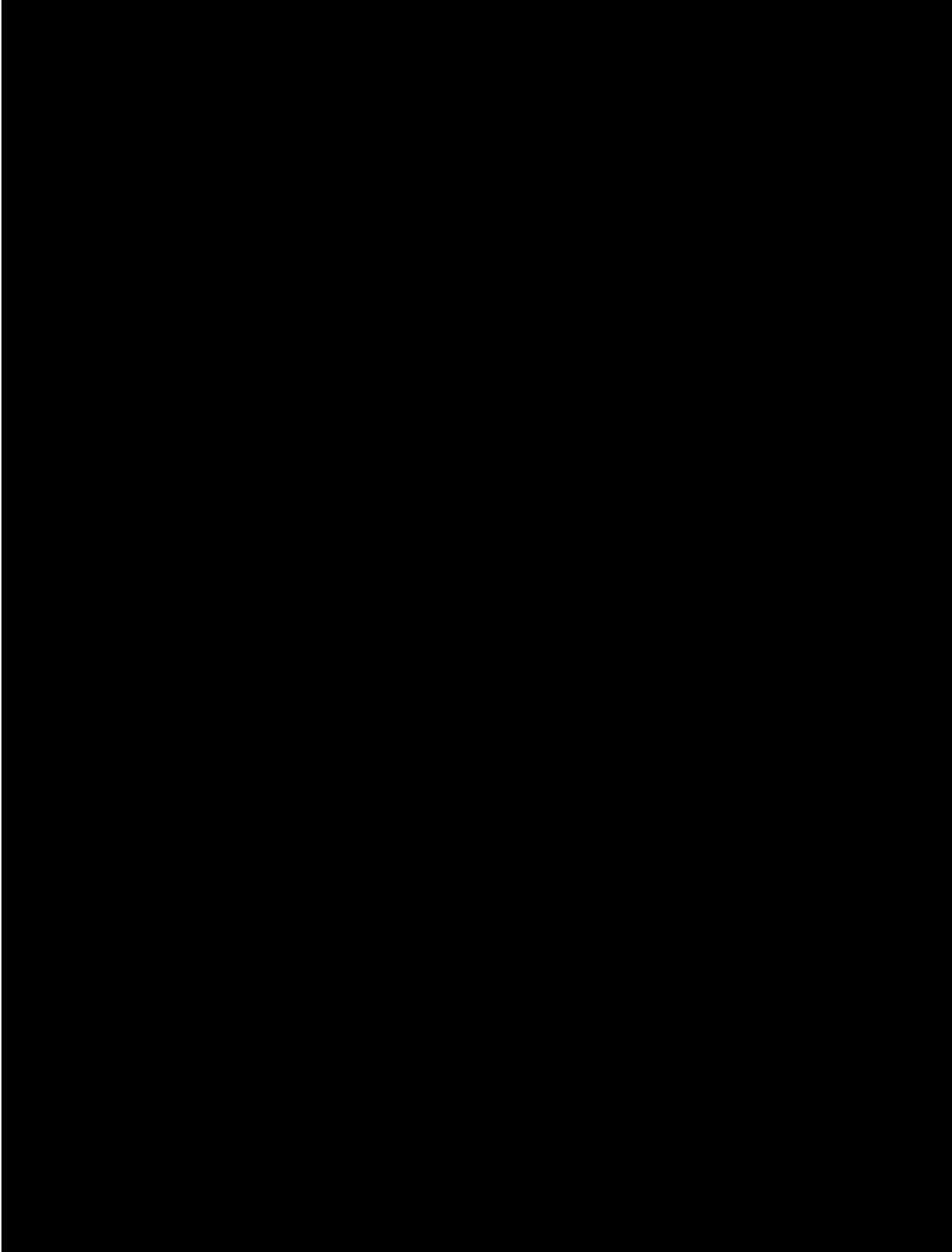
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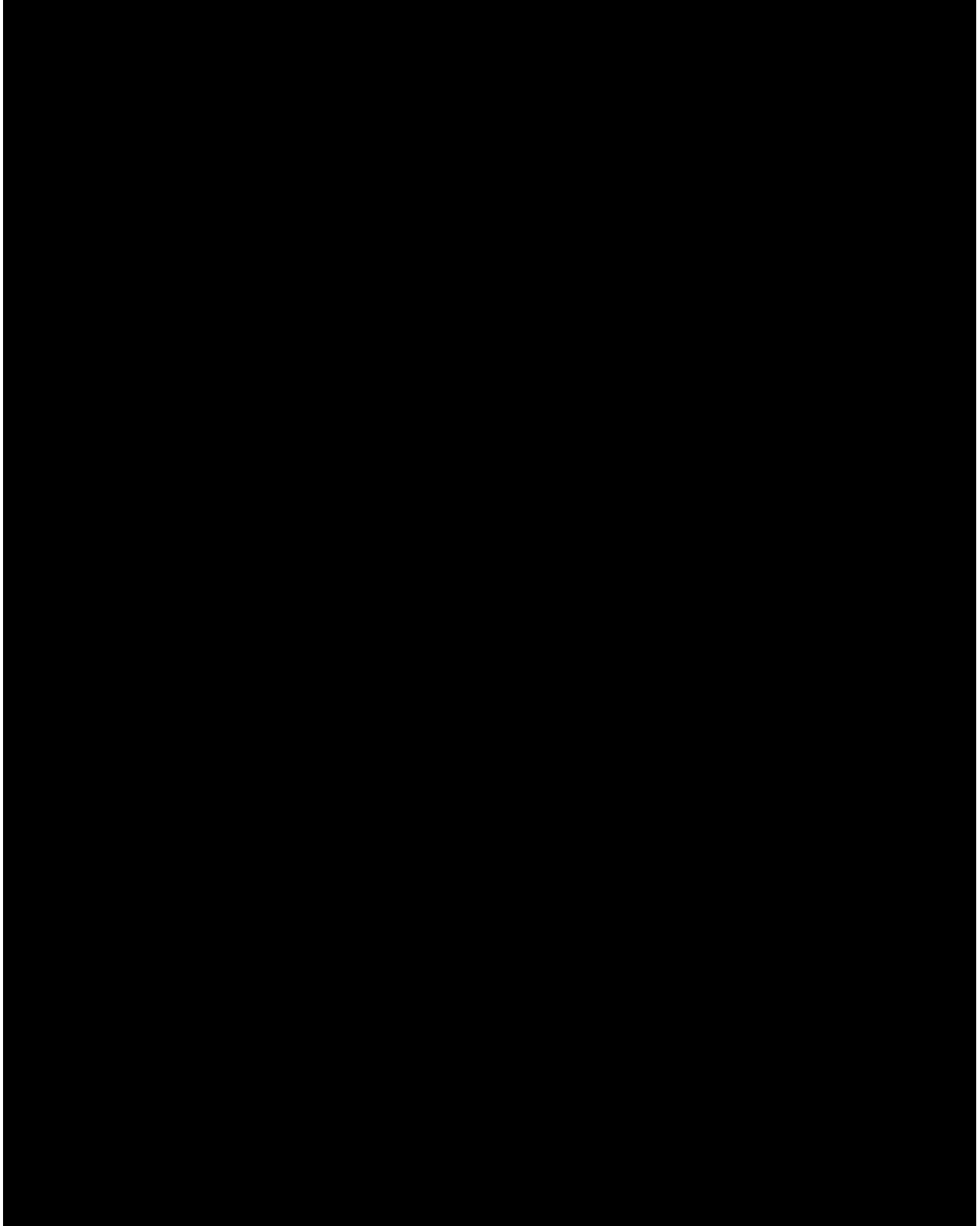
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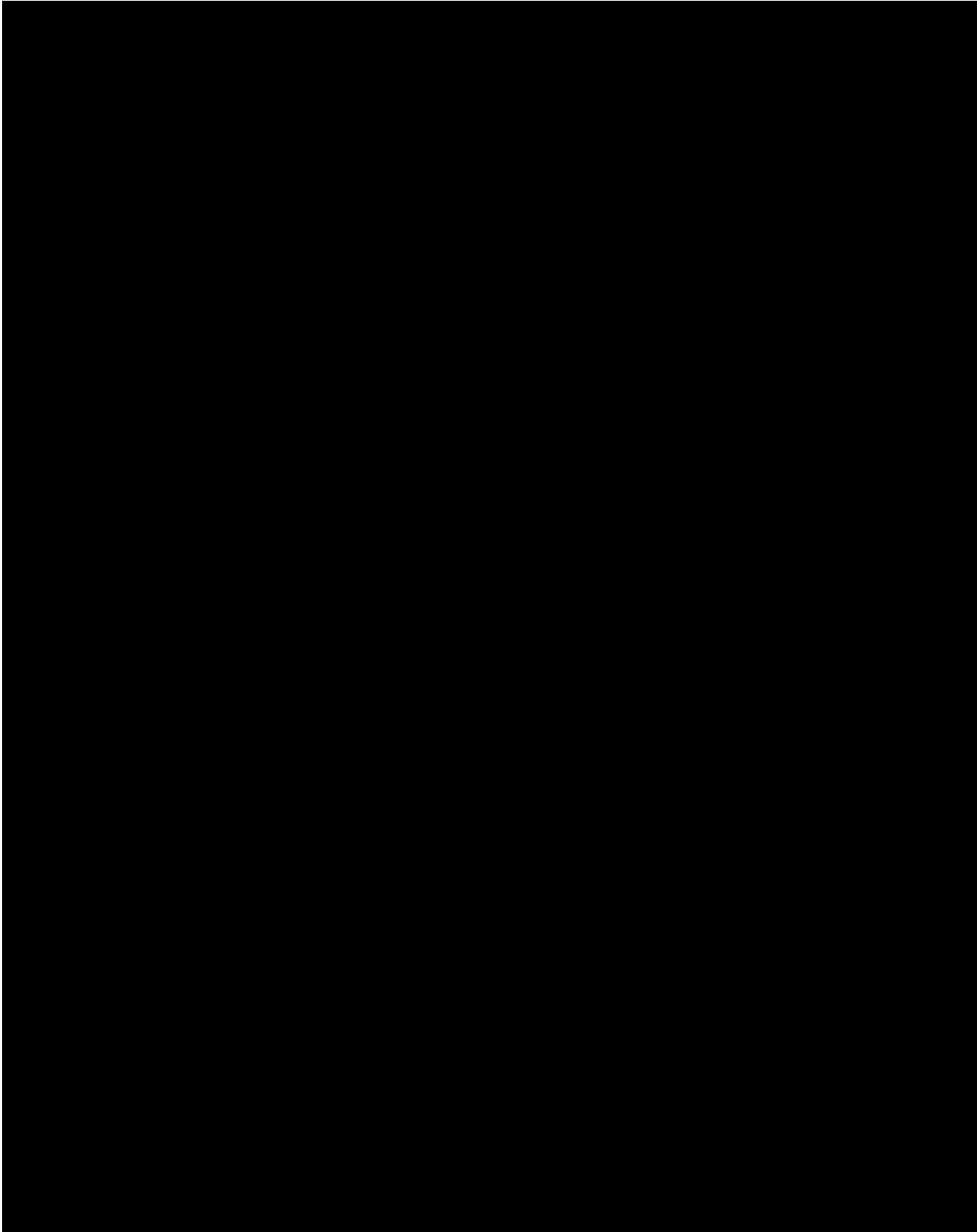
# Physical Security Plan



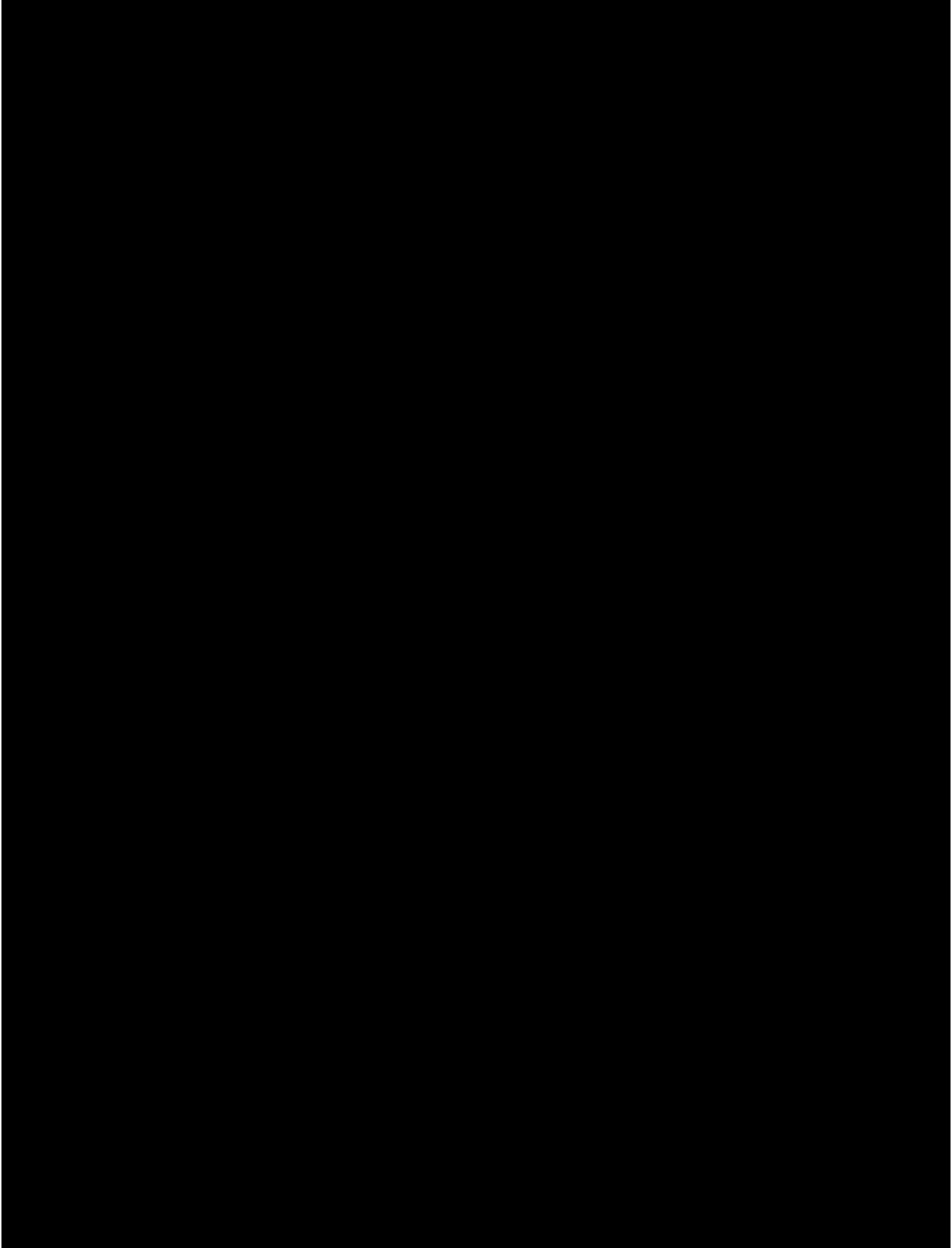
# Physical Security Plan



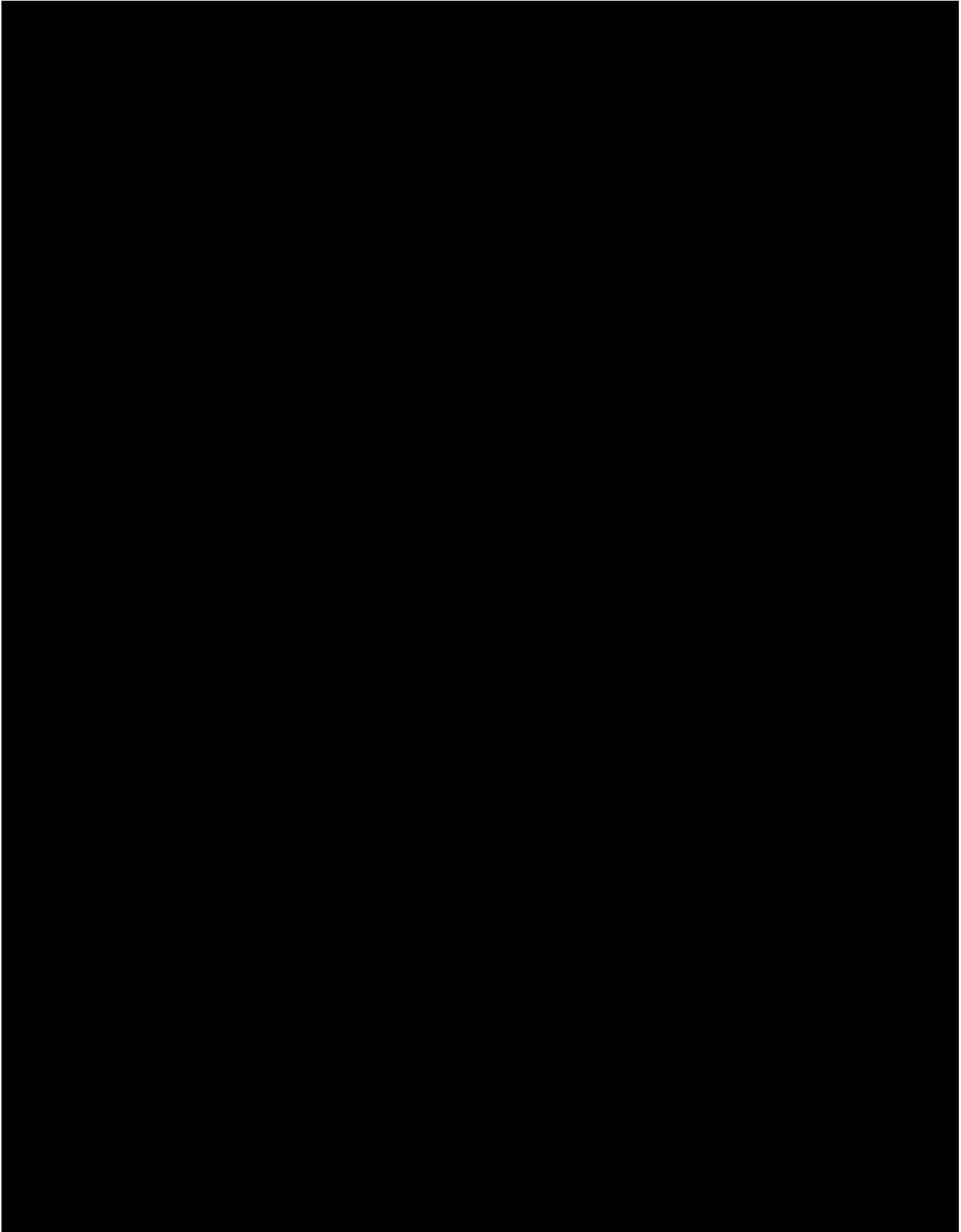
# Physical Security Plan



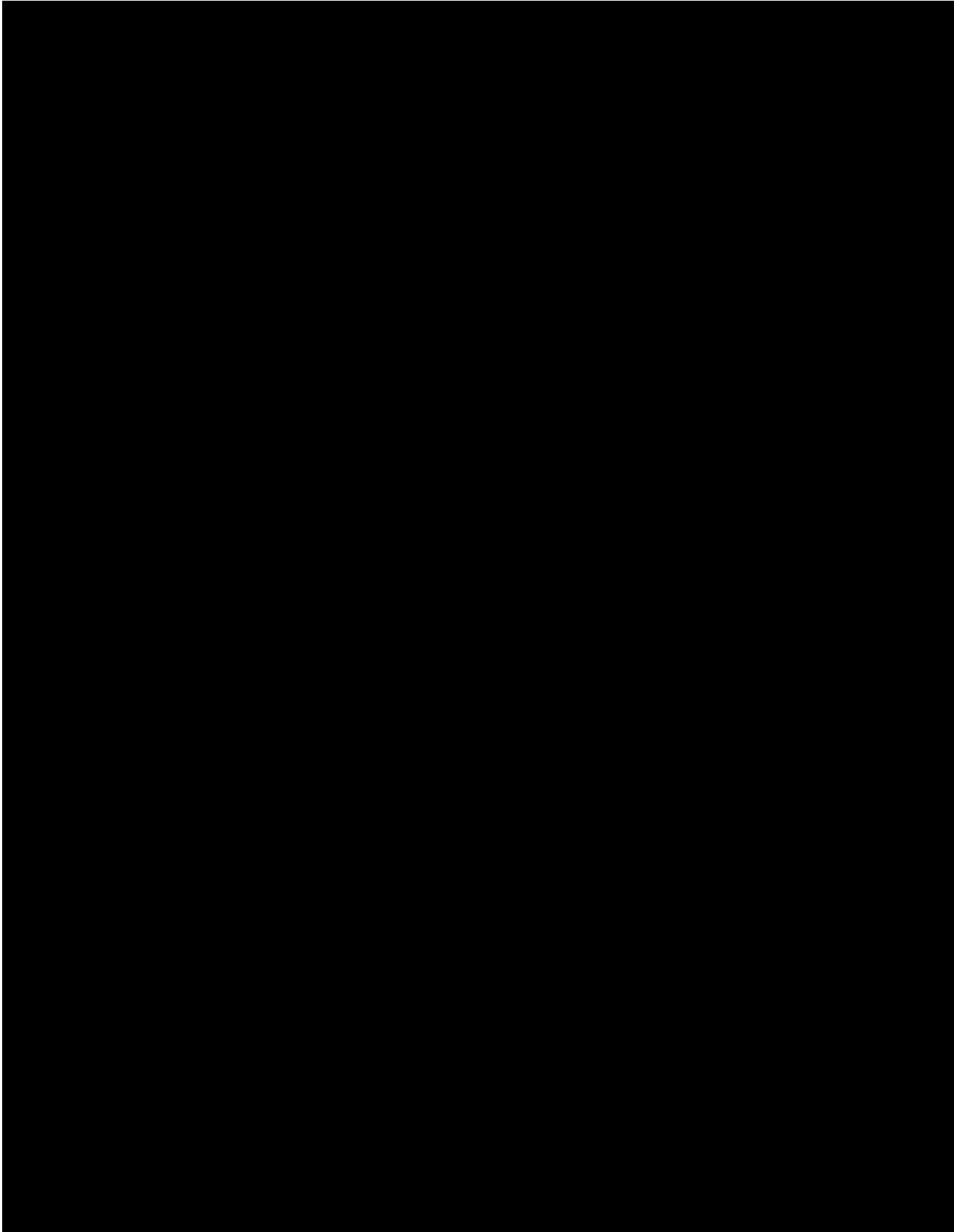
# Physical Security Plan



# Physical Security Plan

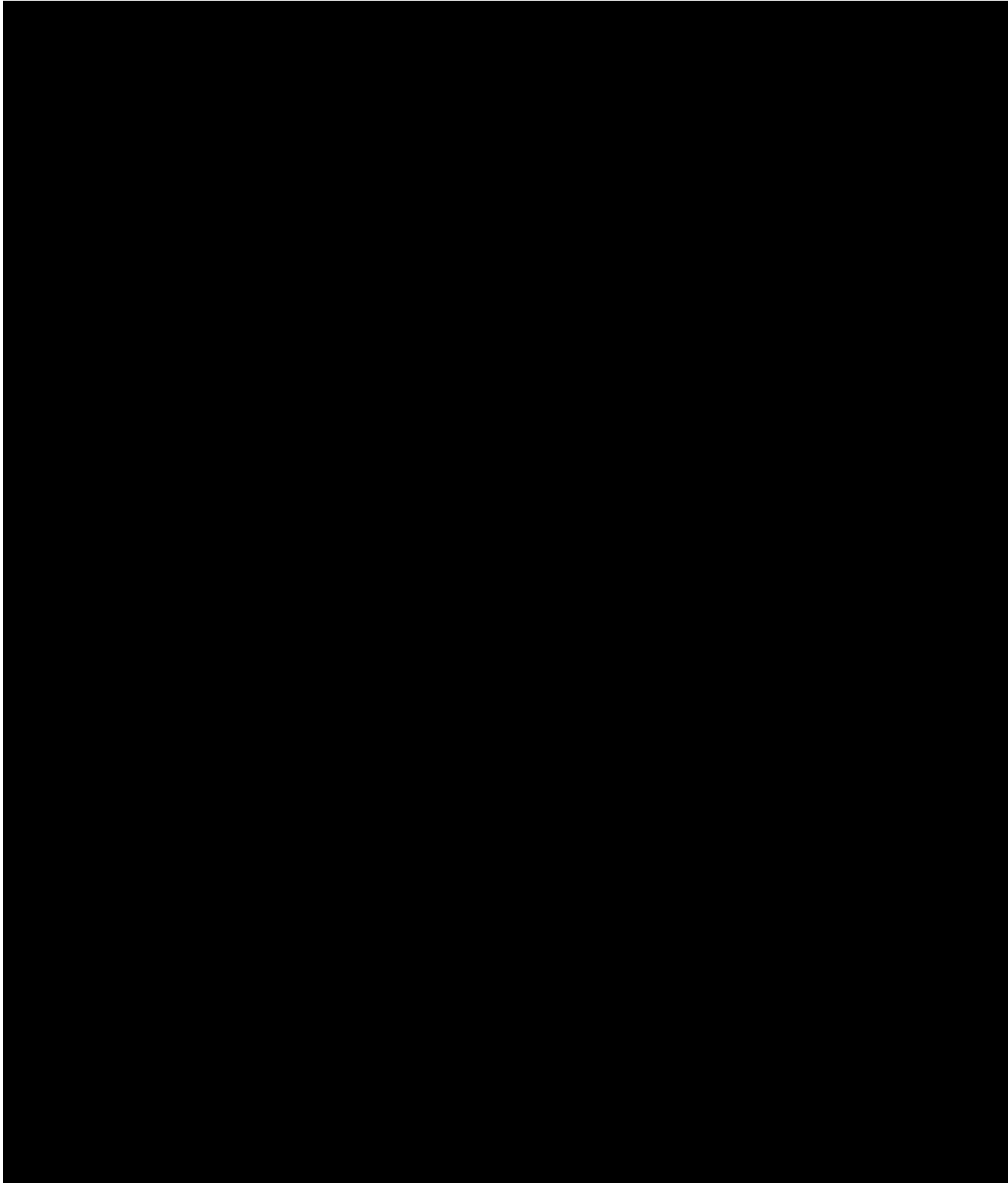


# Physical Security Plan

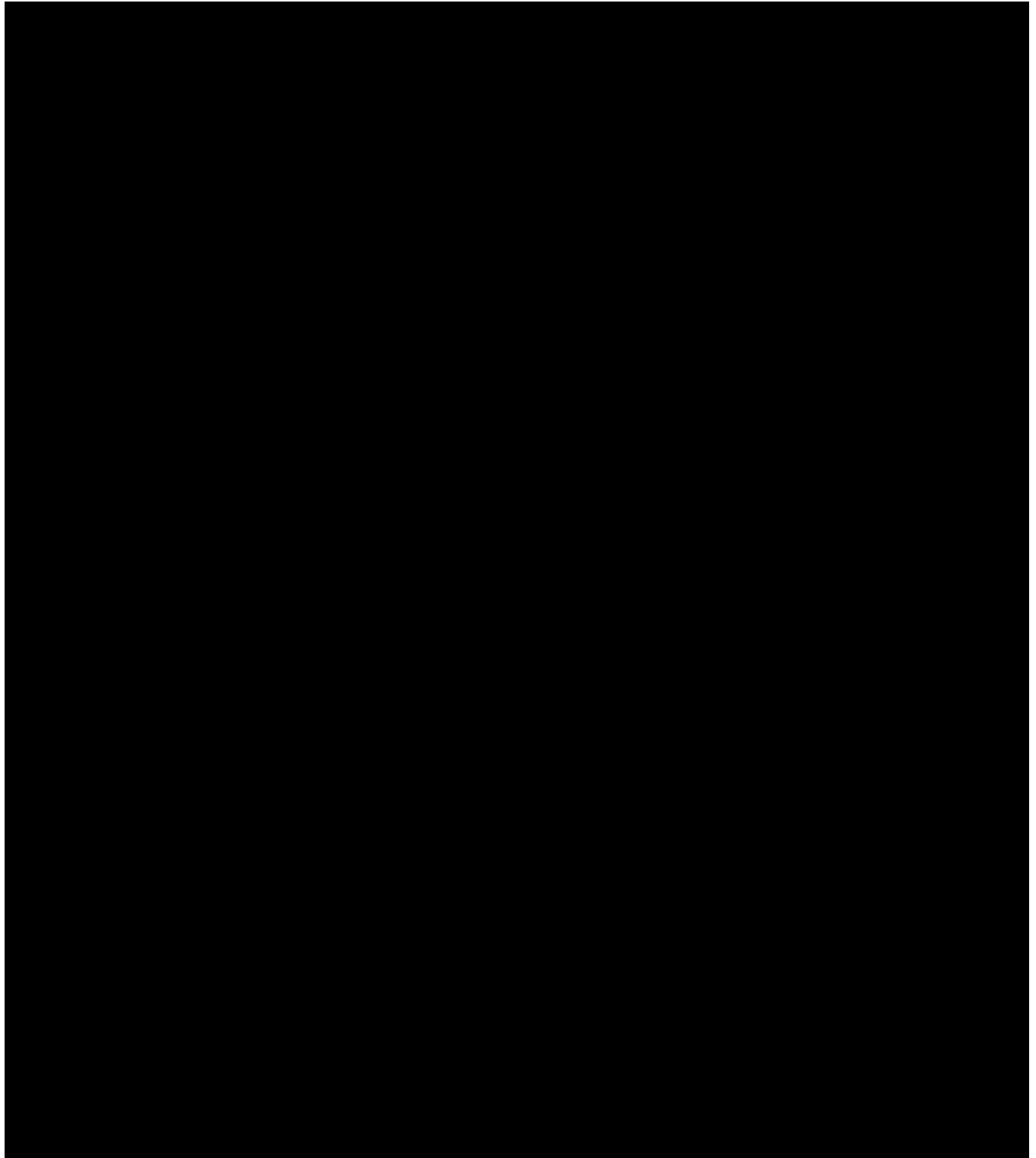




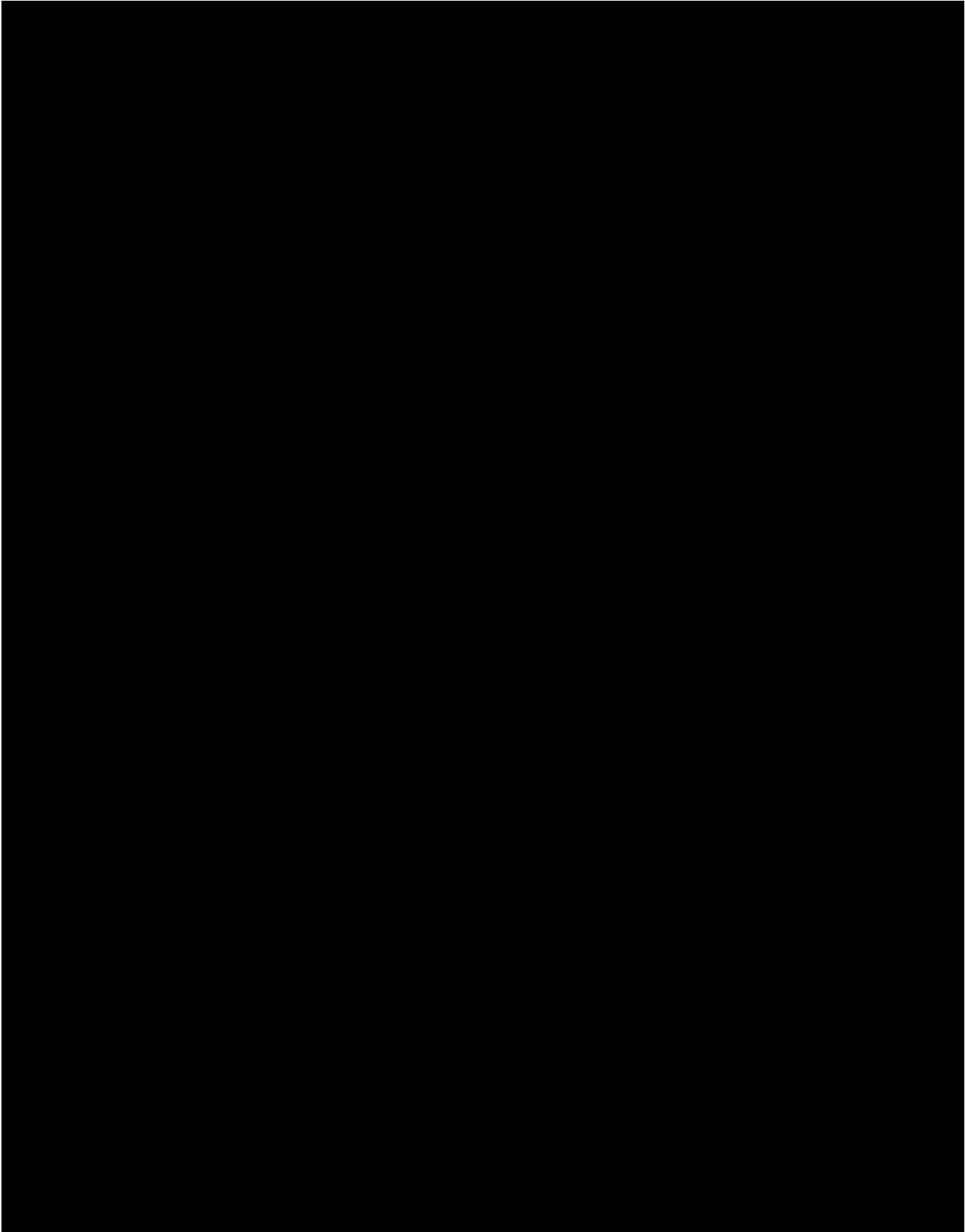
# Physical Security Plan



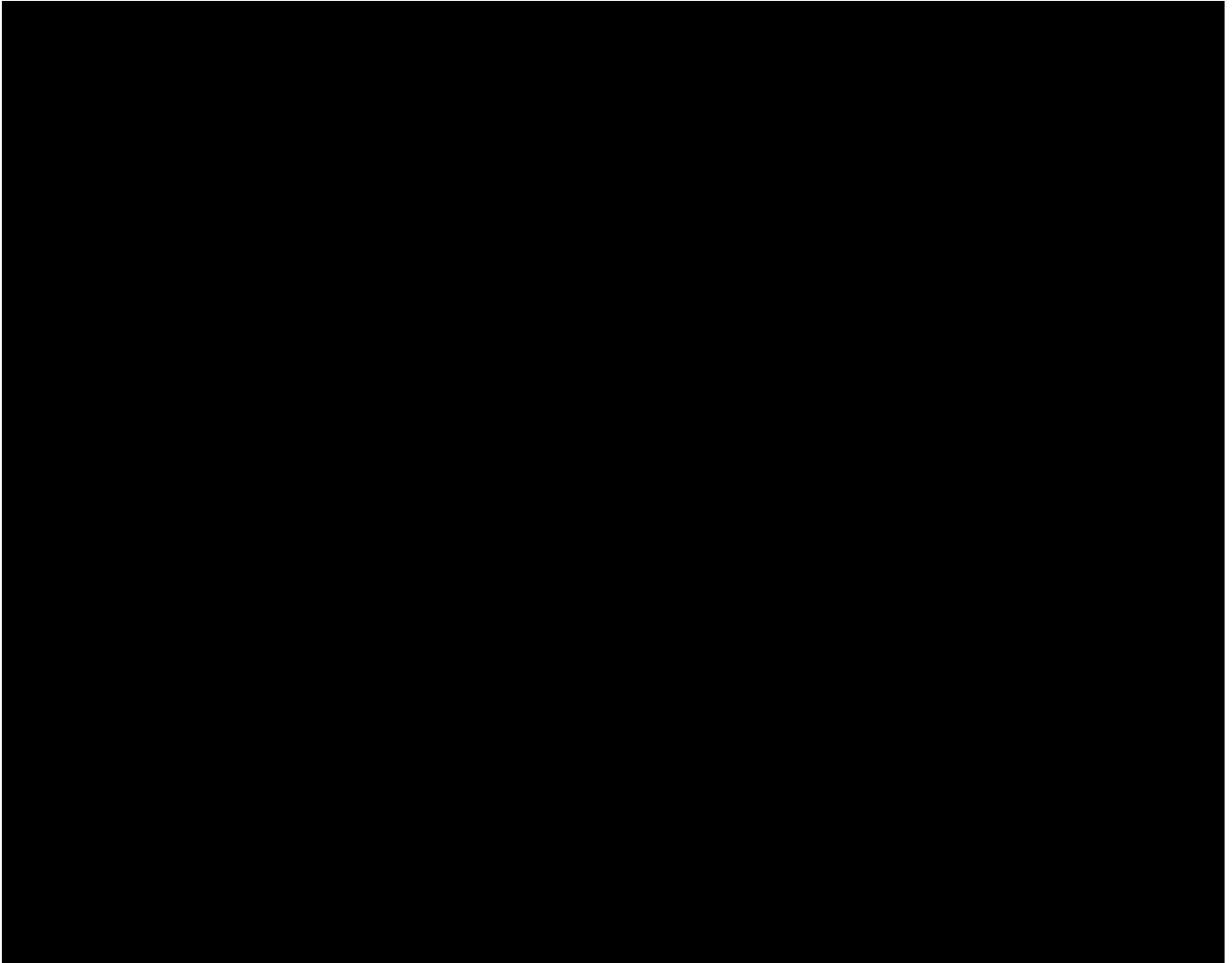
# Physical Security Plan



# Physical Security Plan



# Physical Security Plan



# Physical Security Plan

