

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

NEPR

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IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Supplemental Submission of Quarterly Performance Metrics for March, April and May 2021 and Request for Leave to Defer Reporting on Specified Metrics.

**MOTION SUPPLEMENTING QUARTERLY PERFORMANCE METRICS REPORT
AND REQUESTING LEAVE TO DEFER REPORTING ON SPECIFIED METRICS**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, **LUMA**), through the undersigned legal counsel and respectfully state and request the following:

1. On June 22, 2021, LUMA filed a partial submission of quarterly reports on specified metrics on the performance of the Puerto Rico Electric Power Authority (“PREPA”). This, in compliance with the Resolution and Order issued by this honorable Puerto Rico Energy Bureau (“Energy Bureau”) on May 21, 2021 (“LUMA’s June 22nd Submission”). *See* LUMA’s June 22nd Submission and Exhibit 1 to said Submission.
2. LUMA’s June 22nd Submission included a request for ten additional business days to gather the necessary data to complete the quarterly report for the following categories of performance metrics:
 - a. Several Customer Service;
 - b. Financial;

- c. Planning and Environmental;
 - d. Operations – Purchasing;
 - e. Operations - Warehousing;
 - f. Operations – Fleet; and
 - g. IT.
3. As of the filing of this Motion, the honorable Energy Bureau has not addressed LUMA’s request for additional time to submit data on the performance metrics that are outlined in paragraph 2 *supra*.
 4. Within the timeframe requested in LUMA’s June 22nd Submission, LUMA respectfully submits quarterly data on the following performance metrics: customer service; financial; planning and environmental; operations - purchasing; and operations -warehousing. *See* Exhibit 1 submitted via email (excel spreadsheet with summary of metrics). *See also* raw data submitted via email. However, LUMA was unable to provide within the allotted time, IT metrics, capital related Financial metrics and fleet metrics.
 5. It is respectfully informed that LUMA does not currently have access to certain systems where relevant data for Information Technology (“IT”) metrics is maintained. LUMA anticipates it will complete integration to the systems and gain access to the same within an estimated three weeks, however, does not currently have certainty of when it will gain access to the data. Given this lack of access to relevant data, LUMA is not able to produce the quarterly report on the following IT metrics:
 - a. On-time IT projects,
 - b. System uptime,

- c. Average time to resolve a ticket, and
 - d. Unresolved tickets after 30 days.
- 6. It is respectfully requested that the Energy Bureau grant LUMA leave to file the data on the IT metrics mentioned in paragraph 5 *supra*, in the next quarterly filing due September 2021.
- 7. Additionally, LUMA continues to complete the close of PREPA's May financial records. Thus, several capital expense-related metrics cannot currently be provided. LUMA respectfully submits that the data will be available for the next quarterly report due September 2021. LUMA respectfully requests leave to file the data on the following financial metrics for the month of May 2021 in the next quarterly filing due September 2021:
 - a. Capital expenses vs. budget (system),
 - b. Capital expenses vs. budget - Transmission & Distribution,
 - c. Capital expenses vs. budget – Generation,
 - d. Capital expenses vs. budget- Customer Service,
 - e. Capital expenses vs. budget- Administrative & General (Exec),
 - f. Capital expenses vs. budget- Planning and Environmental Protection, and
 - g. Accounts Payable days outstanding.
- 8. Finally, regarding fleet metrics, it is respectfully informed that due to circumstances beyond its control, LUMA has not been able to gather and review relevant data. Former PREPA personnel that could provide the data are not currently available to assist LUMA in gathering and analyzing the information. Additionally, it is LUMA's understanding that the data is not reliable as maintenance records were not kept by PREPA and the work order system was not functioning. Thus, even if the data was provided by former PREPA personnel, LUMA would

consider the information unreliable for reporting and consideration by this honorable Energy Bureau in this proceeding. LUMA respectfully informs that it is not in position to file a report on fleet metrics for the months of March through May 2021. LUMA respectfully submits that it will report on these metrics in the next quarter, when LUMA expects in good faith to be able to produce, maintain and gather reliable data for reporting on fleet operations.

9. It is respectfully submitted that during the first months of operations and amid a transition of personnel, LUMA has worked diligently to gather relevant data and prepare the performance metrics quarterly filing. Due to those efforts, LUMA was able to file the report for most of the metrics, save for those identified in this Motion.
10. It is respectfully submitted that LUMA will continue to work to streamline data gathering processes to ensure future timely filings of the quarterly performance metrics data. This request to defer reporting on several metrics is made in good faith and based on circumstances that have prevented LUMA to gather and present reliable data to the Energy Bureau.

WHEREFORE, LUMA respectfully requests this Honorable Bureau **take notice of the aforementioned; accept** the supplemental quarterly filing of performance metrics that is submitted as Exhibit 1; and **grant** LUMA leave to defer for the next quarter, the filing of the IT, financial and operations-fleet metrics that are mentioned in paragraphs 5, 7 and 8 of this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of July 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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Exhibit 1
Excel File with Performance Metrics Summary
Raw Data