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SET	Q#	QUESTION	OBJECTIONS	REASON TO COMPEL
LECO-1	5	<p>Refer to the definition of Major Outage Event on p. 37.</p> <p>a. Does this definition differ in any way from the definition of Major Outage Event contained within LUMA's Emergency Response Plan?</p> <p>b. Have any of the outages that occurred since LUMA took over the transmission and distribution system, in June 2021, met the listed criteria?</p>	<p>LUMA objects this request as it seeks information that falls beyond the scope of the subject matter of this proceeding inasmuch as it references performance on outages. As explained at page 8 of LUMA's Revised Performance Metrics Targets filing of August 18, 2021, LUMA objects to that portion of the request that seeks information related to outages that have occurred since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021 and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on outages that have occurred after June 1, 2021, is not relevant to this proceeding.</p>	<p>Information related to LUMA's performance since June 2021 is pertinent and discoverable.</p>
LECO-1	6	<p>Refer to the Summary of Major Outage Event Performance Metrics in Table 24, p. 38. Please provide a detailed description of LUMA's performance, according to each of these metrics, for all outages that have occurred since LUMA took over the transmission and distribution system, in June 2021.</p>	<p>LUMA objects to that portion of the request that seeks information related to LUMA's performance for all outages that have occurred since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021 and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on outages that have occurred after June 1, 2021, is not relevant to this proceeding.</p>	<p>Information related to LUMA's performance since June 2021 is pertinent and discoverable.</p>

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LECO-2		<b>Questions on Rapid Integration of Renewables, including the Quality of Interconnection of Distributed Renewables:</b>		
LECO-2	1	<p>Please refer to LUMA's August 13, 2021 Motion to Show Cause in Docket NEPR-MI-2019-0016. Provide a detailed description of each of the "modifications to expedite [interconnection] procedures" described in that document:</p> <p>a. LUMA has transitioned from a regionalized structure to a centralized structure with standardized procedures.</p> <p>b. LUMA has also accelerated the studies stage of the interconnection procedure by eliminating sequential revisions in cases that do not require additional technical review.</p> <p>c. The net metering procedures and necessary changes of meters are being handled outside of the Portal simultaneously with the validation and studies processes of the interconnection procedure.</p> <p>d. These modifications are being accompanied by employee training and transparent communications with clients.</p>	<p>LUMA objects to that portion of the request that seeks information related to performance since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021 and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on management of interconnections by LUMA after June 1st, 2021, is not relevant to this proceeding.</p>	<p>Information related to LUMA's performance since June 2021 is pertinent and discoverable. This reason applies to LECO 2nd ROI Questions 1-8.</p>
LECO-2	2	<p>Refer to this statement in LUMA's August 13th filing: "LUMA has also accelerated the studies stage of the interconnection procedure by eliminating sequential revisions in cases that do not require additional technical review." Please provide a detailed description of the "technical review" referred to here.</p>	<p>Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.</p>	

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LECO-2	3	Refer to this statement in LUMA's August 13th filing: "LUMA plans to methodically reduce the number of cases in sequential order, in order to be reasonable with those clients who have had [sic] waited the longest since they submitted their requests to PREPA." Please provide a detailed description of the plan referenced in this sentence.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	
LECO-2	4	According to LUMA's August 13th filings in PREB Docket NEPR-MI-2019-0016, as of May 1, 2021, PREPA had 7,208 pending requests for interconnection of distributed generation systems to the grid. As of July 31, 2021, LUMA had 6,978 pending requests. a. Please specify the number of pending requests, as of May 1st, and as of July 31st, from each customer class (e.g. residential, commercial, industrial, etc.) b. Please provide the number of requests that are over: i. 30 days old ii. 180 days old iii. 1 year old	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	
LECO-2	5	Please list each day since June 1, 2021 where the Net Metering Portal has been nonfunctional for any part of the day.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	
LECO-2	6	Please provide a detailed description of LUMA's plan to improve the performance of the Net Metering Portal.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	
LECO-2	7	For customers that submitted a Net Metering Request since June 1st: provide the number of customers who had Net Metering on their bill within thirty days of submission.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	

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LECO-2	8	Please provide the number of net metering-capable meters available to LUMA to be dedicated to new Net Metering customers. Does LUMA anticipate any delay in processing applications, due to a meter shortage?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-001.	
LECO-2		<b>Questions on the LUMA Emergency Response Plan (ERP):</b>		
LECO-2	16	Please refer to p. 7 of the Emergency Response Plan. What is the status of LUMA's scenario specific plans? Produce copies of the scenario specific plans or any drafts of these plans.	LUMA objects to this request as it seeks information and documents that fall beyond the scope of the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects this request as the information sought is irrelevant to the matters at issue on LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to T&D OMA. The Emergency Response Plan is not at issue in the instant proceeding. Additionally, LUMA objects to this request inasmuch as it seeks to undermine an already established public regulatory proceeding. The Emergency Response Plan is under consideration by the Puerto Rico Energy Bureau in Case No. NEPR-MI-2019-0006 (Planes de Autoridad de Energía Eléctrica de Puerto Rico para Atender Emergencias). The docket of that case is a matter of public record readily available to the public. A procedural calendar has been issued in said proceeding with dates already scheduled for a public virtual hearing and a deadline for the filing of comments from the general public.	Information on the Emergency Response Plan is pertinent and discoverable because LUMA has proposed several metrics associated with carrying out that plan, and LUMA witnesses relied extensively on the plan to create the proposed metrics. This reason applies to LUMA 2nd ROI Questions 16-61.

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LECO-2	17	P. 7: Specify what parts of the ERP adopted guidance from the National Response Framework and/or the Comprehensive Preparedness Guide.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	18	Explain why the ERP does not discuss the Local Emergency Planning Committees.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	19	P. 8: Specify what risk assessments LUMA has performed. Produce copies of the risk assessments prepared by or at the behest of LUMA.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	20	P.8: Indicate what prevention or risk mitigation strategies LUMA has developed and/or adopted. Produce documentation on LUMA's prevention or risk mitigation strategies.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	21	P.19: List and describe the key elements of LUMA's Incident Command System.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	22	P.19: What emergency preparedness planning has LUMA performed?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	23	P.20: Specify what aspects of the National Incident Management System LUMA has adopted.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	24	P.21: Specify whether LUMA has conducted Damage Prediction Modeling. Produce all relevant documents.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	25	P.21: What Field Labor Resource Predictions and Material Requirement Predictions has LUMA prepared?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	26	P.21: Specify what training programs and exercises LUMA has conducted.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	27	P.21: Explain the elements of an After-Action Report.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2	28	P. 22: Provide copies of the Mutual Aid Assistance Agreements that LUMA has entered into or is currently negotiating.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	29	P.22: Explain the meaning of the following sentence: "In organizational, geographical and jurisdictional terms events are attended to at the lowest possible level."	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	30	P.27: Explain the specific actions and resources required in mountainous terrain to provide workers access to lines and other infrastructure.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	31	P.39: Define "small outage." Please quantify this outage, in terms of customers affected and the duration of the outage.?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	32	P. 39 Define "severe event." Please quantify this outage, in terms of customers affected and the duration of the outage.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	33	P. 42: Explain how outages are prioritized. How does the priority matrix system work?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	34	P. 49: Explain the reference to "limits on information releases".	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	35	P. 71: Explain the following statement: "To some extent electric utility mutual aid will be limited to those partners who are present in Puerto Rico."	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	36	Provide copies of all mutual aid documents, including but not limited to agreements, memoranda of understanding, correspondence and other relevant documentation.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	37	P. 72: Provide a detailed explanation of how LUMA will "minimize the need for specialized training or work practices". Please provide a detailed description of the "specialized training."	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2	38	P.81: Explain the terms, limits and conditions of the proposed noncompetitive emergency procurement. Specify any amount and time limits for noncompetitive procurement.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	39	P.111: How did LUMA calculate the number of customers at 2,956,102?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2		<b>Questions on Annex A Major Outage Restoration:</b>		
LECO-2	40	P.13: Provide the Employee Staffing Roster with a full list of all relevant positions.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	41	P. 27: Explain how LUMA determined the levels of critical facilities.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	42	P. 35: Provide the documentation that forms the basis for the statement that a Type 1, catastrophic event , historically results in significant damage to the electrical transmission and distribution system, typically involves >50% (700,000) customer interruptions, >50,000 outage events and is anticipated to occur between one and four times in ten years.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	43	P. 36: Provide the documentation that provides the basis for the statement that a Type 2, severe event , historically results in significant damage to the electrical transmission and distribution system in a region or moderate damage across the entire territory, typically 25-50% (350,000-700,000) customer interruptions, >25,000 outage events and is anticipated to occur between two and four times in five years.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	



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LECO-2	44	P. 37: Provide the documentation that provides the basis for the statement that a Type 3 event (tropical depression/storm), historically results in significant damage to the electrical transmission and distribution system in districts or moderate damage to regions, typically involves 10-25% (70,000-350,000) customer interruptions, >25,000 outage events and is anticipated to occur between one and five times per year.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	45	P. 37: Explain the meaning of decentralized dispatching in this context.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	46	Specify how the outside assistance from contractors and mutual assistance would work.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	47	P. 37: Provide the documentation that provides the basis for the statement that a Type 4 event which includes thunderstorms, high winds, frequent and/or severe lightning, small to moderate winter storms or unanticipated events, historically results in significant damage to the electrical transmission and distribution system in districts or moderate damage to regions, typically 1-5% (14,000-70,000) customer interruptions, > outage events and is anticipated to occur between five and ten times per year.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	48	P. 39: Provide the documentation that explains the basis for the statement that a Type 5 event constitutes normal operations, typically involves <1% (14,000) customer interruptions and <2500 outage events.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2	49	P. 41: Explain the frequency, duration and causes of downed wires, including but not limited to incidents of burning, arcing and sparking.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	50	50.Explain the methodology LUMA used to determine critical facilities and produce the relevant documentation. State LUMA’s definition of critical facilities. Explain whether water treatment plants include water purification/filtration plants.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	51	P. 44: Specify what Level 2 critical facilities “support other critical government functions besides prisons.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	52	P. 44: Define “other large customers” in Level 3.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	53	P. 45: Define Minimum Restoration Time, Larger Area Outages, and Smaller Area Outages.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	54	P. 46: Explain the following allegation: “Estimated Time of Outages will establish the baseline of projections”.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	55	P.63: Explain the methodology and produce the documentation for the calculation of downed wires restoration times.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2		<b>Questions on Appendix B Area Restoration Prioritization:</b>		
LECO-2	56	How did LUMA determine area restoration prioritization?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	57	Are all critical facilities included?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2		<b>Questions on Annex B Fire Response:</b>		
LECO-2	58	List the different types of fire hazards and LUMA’s plan to respond to each.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2		<b>Questions on Annex C Earthquake Response:</b>		
LECO-2	59	P. 10 Explain how the major, medium and minor geographical faults potentially impact and relate to the T&D infrastructure.	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2		<b>Questions on Annex C Hazards Assessment:</b>		
LECO-2	60	P. 26 What are the potential impacts of tsunamis to T&D infrastructure?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	
LECO-2	61	What are the potential impacts of flooding/sea level rise/fires in subtropical dry areas/climate change to T&D infrastructure?	Please refer to the response provided in RFI-LUMA-AP-2020-0025-LECO-R2-13SEPT21-016.	

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LECO-2		Questions on the Monacillos substation fire event:		
LECO-2	62	Describe the LUMA emergency response to the Monacillos substation fire event.	<p>and documents that fall beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects this request as the information sought is irrelevant to the matters at issue on LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to T&amp;D OMA. The Monacillos substation fire event is not at issue in the instant proceeding. Moreover, LUMA objects to this request as overly broad and unduly burdensome. It imposes on LUMA an additional burden by requesting information that is not connected to LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to T&amp;D OMA and confidential information that is in the possession of third parties in whole or in part. Additionally, LUMA objects to this request as it seeks to undermine an ongoing investigation by the Puerto Rico Energy Bureau. This event is part of an ongoing investigation of the Puerto Rico Energy Bureau in Case No. NEPR-IN-2021-0002 (Interrupción de Servicio Eléctrico de 10 de junio de 2021). Furthermore, LUMA objects to the request in as much as it seeks information related to performance or an incident that occurred since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in</p>	Information related to LUMA's performance since June 2021 is pertinent and discoverable - especially as it relates to LUMA's responsibility for the ongoing electricity crisis.

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LECO-2		Questions on emergency events since LUMA took over operation of the T&D system:		
LECO-2	65	List and describe all the emergency events since LUMA took over/assumed operation and management of the T&D system and other areas of the Puerto Rico electric system.	<p>LUMA objects to this request as it seeks information and documents that fall beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects this request as the information sought is irrelevant to the matters at issue on LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to T&amp;D OMA.</p> <p>LUMA objects to that portion of the request that seeks information related to emergency that have occurred since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021 and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on emergency events that have occurred after June 1, 2021, is not relevant to this proceeding. Moreover, LUMA objects to this request as being overly broad and unduly burdensome. The term "emergency events" is undefined and does not place LUMA in a position to provide a precise response. Also, it imposes on LUMA an undue burden by requesting information that is not connected to LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to T&amp;D OMA.</p>	Information related to LUMA's performance since June 2021 is pertinent and discoverable.

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LECO-2	66	Provide documentation of all the emergency events since LUMA took over/assumed operation and management of the T&D system and other areas of the Puerto Rico electric system.		Information related to LUMA's performance since June 2021 is pertinent and discoverable.
LECO-3	1	What years does LUMA's evaluation of PREPA PR OSHA-300 correspond to? Was only the registration for the 2019-2020 fiscal year considered? If LUMA only considered fiscal year 2019-2020, why not evaluate previous years to have a wider context of employee incidents recorded by PREPA?	LUMA objects to this request because it employs the vague term "wider context" and does not provide sufficient context to ascertain the relevance of the request in connection with LUMA's Revised Performance Metrics Targets Submission and proposed Revised Annex IX to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("T&D OMA") filed on September 24, 2021 ("LUMA's Revised Performance Metrics Targets filing"). LUMA also objects to this request because it is argumentative.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.
LECO-3	2	Did LUMA compare the information collected through the PREPA PR OSHA-300 with information or material from other comparable electrical utilities of other states or jurisdictions?	LUMA's response: Other companies' OSHA information is not directly available to LUMA.	LUMA has access to information from PREPA concerning OSHA safety standards. We know this because LUMA has used the PR OSHA 300 forms to support several metrics.

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LECO-3	3	What standards adopted by PR OSHA did LUMA use to prepare performance metrics in safety and health?	LUMA objects to this request as ambiguous and unintelligible. It references standards adopted by PR OSHA without sufficient context to allow LUMA to understand and identify relevant standards responsive to this request. Also, LUMA is not in a position to ascertain the relevance of the request in connection with LUMA's Revised Proposed Performance Metrics Targets filing, and thus, LUMA's witness cannot answer. LUMA also objects to this request as argumentative and because it is based on the unsupported and unexplained premise that OSHA PR has adopted specific standards.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.
LECO-3	4	Did LUMA or any LUMA witness review the Regulations developed and approved by PR OSHA and with Act No. 16 of August 5, 1975, as amended?	LUMA objects to this request because it is vague and overly broad. It does not specify the relevant timeframe nor the specific regulatory or statutory provisions that the request purports to cover. The request does not provide sufficient context to allow LUMA to understand the request and identify responsive information. Also, LUMA is not in a position to ascertain the relevance of the request in connection with LUMA's Revised Proposed Performance Metrics Targets filing. However, LUMA is aware of how the legislation enacted impacts the reporting and recording of workplace injuries.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control. As to vagueness: LECO's third ROI included an Introduction for this precise reason: to provide the necessary context for LUMA to answer Questions 3 & 4. Finally, LUMA has a legal duty as an employer to know and comply with all local and federal labor laws that apply in Puerto Rico.

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LECO-3	5	What documents, in addition to PREPA PR OSHA-300, did LUMA use to prepare performance metrics in safety and health? a. Submit a copy of all documents that LUMA used.	LUMA objects to this request as repetitive of, for example, RFI-LUMA-AP-2020-0025-LECO-10SEPT21-002. LUMA also objects to this request as it ignores the pre-filed testimony of J. Meléndez of September 9, 2021, and the exhibits to said testimony.	LECO's request clearly required a copy of all documents that LUMA used to prepare occupational health and safety performance metrics. In its response, LUMA refers to RFI-LUMA-AP-2020-0025-LECO-10SEPT21-002, Pre-filed Testimony of José Meléndez, lines 32-42 and 81-86 and Exhibit 1. Although José Meléndez's testimony mentions that they used PREPA PR OSHA 300 forms, they have not presented a copy of them.
LECO-3	6	Has witness Jorge Meléndez obtained any training regarding OSHA standard number 1910.269: "Electric power generation, transmission, and distribution"? If so, please provide certifications and evidence of those trainings.	LUMA objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control. In addition, LUMA failed to provide evidence demonstrating the witness'es trainings and certifications.



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LECO-3	8	Is LUMA aware that the Puerto Rico Occupational Safety and Health Administration (“PR OSHA”) provides consulting services? Has LUMA requested the consulting services that PR OSHA provides?	LUMA objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.
LECO-3	9	How many inspections, if any, has PR OSHA performed at LUMA-managed and supervised workplaces since June 1, 2021? PREB’s orders in this docket, as well as PREB’s orders in Docket No. NEPR-MI-2019-0007, make it clear that metrics, baselines, and benchmarks will continue to evolve and that this evolution will be informed by LUMA’s ongoing performance. LUMA’s performance since June 1, 2021, therefore, is relevant evidence in this proceeding.	LUMA objects to this request because it is argumentative and includes a legal conclusion by counsel. LUMA also objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets. LUMA specifically objects to this request that seeks information related to occurrences since LUMA took over the transmission and distribution system in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021, and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on OSHA inspections related to health and safety after June 1st, 2021, is not relevant to this proceeding.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.

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LECO-3	10	How many incidents related to health and safety have occurred since June 1, 2021? a. Provide the details, documents generated in investigative reports made.	LUMA objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets. LUMA specifically objects to this request that seeks information related to occurrences since LUMA took over the transmission and distribution system in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021, and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on incidents related to health and safety after June 1st, 2021, is not relevant to this proceeding.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control. In addition: LECO was specific in requesting the details and documents generated by the incident's investigations. This information is very pertinent when it comes to the safety and health of LUMA workers and strict compliance with the laws and regulations administered by PR OSHA.

SET	Q#	QUESTION	OBJECTIONS	REASON TO COMPEL
LECO-3	11	<p>Has LUMA already received citations and penalty proposals from PR OSHA?</p> <p>a. If yes, how many?</p> <p>b. In what workplace was the inspection that led to the issuance of the citations and penalty proposal?</p> <p>c. Submit a copy of all correspondence between LUMA and PR OSHA, and any documents in LUMA's possession related to PR OSHA, specifically including documents related to citations and penalties issued by PR OSHA to LUMA.</p>	<p>LUMA objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets. LUMA specifically objects to this request that seeks information related to occurrences since LUMA took over the transmission and distribution system in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021, and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. Thus, the requested information on incidents related to health and safety after June 1st, 2021, is not relevant to this proceeding. LUMA also objects to this request to the extent that it purports to obtain information on ongoing investigations that includes confidential data.</p>	<p>The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&amp;D OMA, but rather any performance area within LUMA's reasonable control.</p>

SET	Q#	QUESTION	OBJECTIONS	REASON TO COMPEL
LECO-4	2	PREB's May Order includes a metric for "Capital expenses vs. Budget – Transmission & Distribution" and sets a baseline for a 9.9% ratio of T&D capital expenses to operating budget. Did LUMA consider including this metric in its proposed Annex IX? If so, why did LUMA choose not to include it? If not, why not?	LUMA objects to this request as it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Further, LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets. The proposed Performance Metrics Targets submitted by LUMA for consideration by the PREB were adopted within the competitive negotiated processes conducted by the P3 Authority that led to the execution of the T&D OMA.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.
LECO-4	14	PREB's Attachment A includes Generation from RPS-eligible PPOAs as a metric, with a baseline of 3% and benchmark of 40% by 2025 (including distributed resources). Did LUMA consider including this metric in its proposed Annex IX? If so, why did LUMA choose not to include it? If not, why not?	LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets. The proposed Performance Metrics Targets submitted by LUMA for consideration by the PREB were adopted within the competitive negotiated processes conducted by the P3 Authority that led to the execution of the T&D OMA.  LUMA also objects to this request as it calls for speculation or a hypothetical scenario and because it does not consider that the proposed Performance Metrics Targets submitted by LUMA for consideration by the Puerto Rico Energy Bureau were adopted within the competitive negotiated processes conducted by the Puerto Rico Public-Private Partnerships Authority that led to the execution of the T&D OMA. LUMA further objects to this request because it is argumentative and includes a legal interpretation by counsel.	The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&D OMA, but rather any performance area within LUMA's reasonable control.

SET	Q#	QUESTION	OBJECTIONS	REASON TO COMPEL
LECO-4	15	<p>PREB’s Attachment A includes several other metrics not included in LUMA’s proposed Annex IX:</p> <ul style="list-style-type: none"> <li>a. Customer Average Interruption Duration Index (CAIDI) as a metric, with a baseline of 145 minutes and a benchmark of 101 minutes.</li> <li>b. Absenteeism, with a Baseline of 13.1% and a Benchmark of 2.4%.</li> <li>c. wait time in commercial offices</li> <li>d. % of customer calls answered</li> <li>e. average time to resolve billing disputes</li> <li>f. percent of customers billed</li> <li>g. percent of bills estimated vs. read</li> <li>h. average time to respond to service and outage complaints</li> </ul> <p>For each metric: Did LUMA consider including this metric in its proposed Annex IX? If so, why did LUMA choose not to include it? If not, why not?</p>	<p>LUMA objects to this request as the information sought is irrelevant to the controversy at issue on LUMA's Revised Performance Metrics Targets.</p> <p>LUMA also objects to this request as it calls for speculation or a hypothetical scenario and because it does not consider that the proposed Performance Metrics Targets submitted by LUMA for consideration by the Puerto Rico Energy Bureau were adopted within the competitive negotiated processes conducted by the P3 Authority that led to the execution of the T&amp;D OMA. LUMA further objects to this request because it is argumentative and includes a legal interpretation by counsel.</p>	<p>The information discoverable in this proceeding is not limited to LUMA's proposed metrics or the T&amp;D OMA, but rather any performance area within LUMA's reasonable control.</p>
LECO-4	18	<p>Do the SAIDI and SAIFI calculations that LUMA presented for the months of June through August reflect the same methodology used to calculate the SAIDI and SAIFI values that LUMA presented for months prior to June 2021? If not, please specify all changes to methodology.</p>	<p>LUMA objects to that portion of the request that seeks information related to calculations since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau issued the Resolutions and Orders of May 21, 2021, and July 2, 2021, in Case No. NEPR-MI-2019-0007. Thus, the requested information on data after June 1st, 2021, is not relevant to this proceeding.</p>	<p>Information related to LUMA's performance since June 2021 is pertinent and discoverable - especially as it relates to LUMA's responsibility for the ongoing electricity crisis.</p>

SET	Q#	QUESTION	OBJECTIONS	REASON TO COMPEL
LECO-4	20	Please provide the raw outage data from January 1, 2021 through August 31, 2021. Data from the system after LUMA's June 1st takeover is relevant because PREB's orders in Docket # NEPR-MI-2019-0007 have made it clear that baselines and benchmarks must be informed by ongoing collection of data on LUMA's performance.	LUMA objects to this request because it seeks information that falls beyond the scope of the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. LUMA objects to the request because it seeks information related to performance since LUMA took over the transmission and distribution system, in June 2021. This proceeding does not involve performance or data after the Energy Bureau set the applicable baselines in the Resolutions and Orders of May 21, 2021 and July 2, 2021, issued in Case No. NEPR-MI-2019-0007. The requested information on outage data after June 1st, 2021, is not relevant to this proceeding. LUMA also objects to this request because it is argumentative and includes legal interpretations by counsel.	Information related to LUMA's performance since June 2021 is pertinent and discoverable - especially as it relates to LUMA's responsibility for the ongoing electricity crisis.
LECO-4	22	Provide monthly SAIDI and SAIFI values by region for June 2020 through August 2021 without excluding Major Event Days.	LUMA objects to that portion of the request that seeks information related to data since LUMA took over the T& D System in June 2021. This proceeding does not involve performance or data after the Energy Bureau issued the Resolutions and Orders of May 21, 2021, and July 2, 2021, in Case No. NEPR-MI-2019-0007. Thus, the requested information on data after June 1st, 2021, is not relevant to this proceeding. LUMA is not required to perform these calculations for this proceeding.	Information related to LUMA's performance since June 2021 is pertinent and discoverable - especially as it relates to LUMA's responsibility for the ongoing electricity crisis.