



Technical Session: LUMA Performance Metrics

Docket NEPR MI-2019-0007



February 24, 2022



Agenda

- Goals of Technical Session
- Background
 - Procedural History
- Discussion of Selected Metrics



Goals of Technical Session



Goals of Technical Conference and Procedural History

- Discuss issues related to PREPA's individual metrics
 - Clarifications regarding missing data
 - Clarifications about data being reported
- Discuss issues related to LUMA's individual metrics
 - Clarifications regarding specific metrics
 - Questions regarding metrics proposed to be excluded



Highlighted Procedural History



Goals of Technical Conference and Procedural History

- The Energy Bureau's Resolution and Order from April 27, 2017 (Docket CEPR IN-2016-0002) first published a list of metrics of interest by the Bureau
- The Energy Bureau's Resolution and Order from May 14, 2019 (Docket NEPR MI-2019-0007)
 - Commencement of data gathering process to help develop "appropriate measures, metrics and targets"
 - Metrics for reporting purposes (Docket NEPR MI-2019-0007)
 - Metrics that will be the subject of Targets (Docket NEPR MI-2019-0007)
 - Metrics that will be subject to Financial incentives (Docket NEPR AP-2020-0025 will establish the specific Targets and Performance Incentives Mechanisms)



Goals of Technical Conference and Procedural History

- The Energy Bureau's Resolution and Order from May 21, 2021 (Docket NEPR MI-2019-0007)
 - Established baselines for approximately 96 individual metrics
 - Eliminated approximately 36 metrics
 - Required reporting of 16 additional metrics



Metrics: Performance Reporting Requirements

- On June 1, 2021, LUMA Energy LLC and LUMA Energy Servco, LLC (collectively, LUMA) assumed transmission and distribution operations of PREPA
- On June 21, 2021, LUMA filed the quarterly metrics for the months of March, April, and May 2021 when the transmission and distribution operations were still under PREPA
- On September 20, 2021, LUMA filed the quarterly metrics for the months of June, July and August 2021, when the operations of the transmission and distribution system were under LUMA
- LUMA has filed several motions seeking clarification from the Bureau regarding specific metrics



PREPA



Overall System

Metric	Data Issue	Question
Operational expenses vs budget	All subcategories are missing November data.	<p>What is process for closing books supporting the data?</p> <p>When is the earliest that PREPA can provide this data to the Bureau?</p> <p>Is this being reported against the monthly or annual budget?</p>
A11 Directorado Servicio al Cliente	Missing data since July 2021.	Why is this data missing? When can it be provided?
A12 Directorado Transmisión y Distribución	Same as above	Same as above
A13 Responsabilidades Miscelaneas	Same as above	Same as above
A14 Responsabilidades Corporativas	Missing data before July 2021.	Why is this data missing? When can it be provided?
Capital expenses vs budget	All subcategories are missing November data.	<p>When is the earliest that PREPA can provide this data to the Bureau?</p> <p>Is this being reported against the monthly or annual budget?</p>



Generation

Metric	Data Issue	Question
Cost of Generation (system: O&M)	Units issue with data starting June 2021 (higher by factor of 100)	What units is PREPA using to report this metric?
Cost of Generation by Plant Type	Missing data since July 2021	Why is this data missing? When can it be provided?
Average heat rate	Costa Sur steam plant was not broken out into separate rows for Oil and Natural Gas	Can PREPA provide data for Costa Sur by fuel type?
Plant availability	Costa Sur steam plant was not broken out into separate rows for Oil and Natural Gas	Can PREPA provide data for Costa Sur by fuel type?



Planning and Environmental

Metric	Data Issue	Question
Emissions of SO ₂ , Nox, CO ₂ , PM, Hg and other regulated pollutants (system)	Missing data.	Why is this data missing? When can it be provided?
Emissions rates of SO ₂ , Nox, CO ₂ , PM, Hg and other regulated pollutants (system)	Missing data.	Why is this data missing? When can it be provided?
Carbon intensity of fossil generation	Missing data.	Why is this data missing? When can it be provided?



Operations-Fleet

Metric	Data Issue	Question
Total available vehicles in service (system)	PREPA reported N/A in March-May. Reported zeroes starting June, except for in August where they reported a 9. This does not align with the data provided via bench order in November.	Can PREPA provide corrected numbers? Why is data missing for Sept-Nov?



Human Resources

Metric	Data Issue	Question
OSHA Severity Rate, DART, Fatalities	Missing data for February – May 2021.	When will PREPA provide these numbers?



LUMA



Finance

Metric	LUMA's Comment	Data Issue	Question
Operational expenses vs budget	LUMA requests to align reporting on this metric with LUMA's Quarterly Report on budget and spending.	November data is missing	<p>What is LUMA's proposed reporting deadline?</p> <p>What is LUMA's process for closing books?</p> <p>Is this being reported against the monthly or annual budget?</p>
Capital expenses vs budget	LUMA requests to align reporting on this metric with LUMA's Quarterly Report on budget and spending.	November data is missing	<p>What is LUMA's proposed reporting deadline?</p> <p>What is LUMA's process for closing books?</p> <p>Is this being reported against the monthly or annual budget?</p>
Timely submission of Monthly Operating Report	LUMA would like to request a one-month lag on Finance metrics due to final month's close schedule.	November data is missing	<p>What is LUMA's proposed reporting deadline?</p> <p>What is LUMA's process for closing books?</p>
Accounts Payable days outstanding	LUMA would like to request a one-month lag on Finance metrics due to final month's close schedule.	November data is missing	<p>What is LUMA's proposed reporting deadline?</p> <p>What is LUMA's process for closing books?</p>



Customer Service

Metric	LUMA's Comment	Data Issue	Question
Average length of time to resolve customer complaint appeals	New Metric from May 21, 2021 - LUMA requests clarification, how does PREB define "customer complaints" and "appeals" when calculating this metric.	Missing data	How does LUMA define customer complaints beyond formal complaints? What is the appeal process for LUMA?
Number of customer complaints appealed by customer class	Provide clarification on definition of customer complaints & process / definition of "appealed". This has historically been reported by PREPA as 155 with no supporting documentation.	Same value is repeated each month	What data does LUMA have available on this metric?
Number of formal customer complaints	Formal Customer Complaints in this metric equates to Act 57-2019 claims		How does LUMA define customer complaints beyond formal complaints?
Average time to respond to service and outage complaints	Require clarification on what constitutes a "Service and Outage Complaint"	Missing data	What data is LUMA currently tracking related to this metric?
Average time to resolve billing disputes	Propose exclusion; continue to use PREPA's methodology of inputting 10 to 30 days.	Same value is repeated each month	What data is LUMA currently tracking related to this metric?
Wait time in commercial offices	Requests to rename "Wait time in customer service centers"		How are customer service centers defined?



Overall System

Metric	LUMA's Comment	Data Issue	Question
Monthly peak by customer class	Propose exclusion - this metric has historically been marked as "Not Applicable"	Missing data	Why is this information not available? What would LUMA need to do to get the information? What information does LUMA have about the system?
Monthly peak by district	Propose exclusion - this metric has historically been marked as "Not Applicable"	Missing data	Why is this information not available? What would LUMA need to do to get the information? What information does LUMA have about the system?



Transmission and Distribution

Metric	LUMA's Comment	Data Issue	Question
Net monthly work orders balance	The STORMS system has been one area where there are significant data quality concerns. A clean up effort eliminated old work orders prior to January 1, 2021, and LUMA continues to explore how to improve work order tracking. LUMA has continued to use STORMS for the purpose of this metric, but would appreciate a discussion with PREB as more information becomes available.	Missing data	Does LUMA have any updates on the clean up effort of the system?
MAIFI		Missing data	When does LUMA expect to be able to provide this information?



Planning & Environmental

Metric	LUMA's Comment	Data Issue	Question
<p>Timeliness of permitting- new and renewals</p>	<p>LUMA requests clarification on how PREPA calculated this metric</p>	<p>Missing data</p>	<p>Should this be reported by both LUMA and PREPA?</p> <p>How should this be defined?</p> <p>Should there be subcategories for different permit types?</p>



Operations

Metric	LUMA's Comment	Data Issue	Question
Inventory turns			How is this currently being defined by LUMA?
Fuel Expenditure vs Forecast	Renamed from Fuel Dispatch Accuracy		Is this data coming from PREPA? If not, what is the data source?



Human Resources

Metric	LUMA's Comment	Data Issue	Question
Absenteeism	LUMA requests additional context on purpose of this metric; through the implementation of new technologies, would like to explore an alternative metric.		What is LUMA's proposed alternative metric?



Renewable Energy

Metric	LUMA's Comment	Data Issue	Question
Mean time to interconnect utility scale RPS eligible projects		Missing data	When does LUMA plan to provide this data?
Incremental number of distributed generation installations per month		Previously, the units were shown as "installations per year"	Can LUMA confirm that the numbers provided are per month?
Incremental number of distributed generation installations per month- Wind	Propose exclusion - LUMA currently doesn't have visibility to report on this in DG Portal. Additional capital investments required to DG Portal for calculation.		
Total installed energy storage capacity by type (system and per district)	Same as above		What can LUMA do to increase visibility of storage installations without DG portal? What is LUMA's plan to improve the DG portal?
Incremental installed energy storage capacity per year by type (system and per district)	Same as above		Same as above
Total number of energy storage installations by type (system and per district)	Same as above		Same as above
Incremental number of energy storage installations per year by type (system and per district)	Same as above		Same as above