

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

<b>NEPR</b>  <b>Received:</b>  <b>Mar 21, 2022</b>  <b>6:16 PM</b>
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IN RE: THE PERFORMANCE OF THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY

**CASE NO. NEPR-MI-2019-0007**

**SUBJECT: Request for Clarification or  
Amendment of Energy Bureau Resolution  
and Order of December 14, 2021**

**REQUEST FOR CLARIFICATION OR AMENDMENT OF ENERGY BUREAU  
RESOLUTION AND ORDER OF DECEMBER 14, 2021**

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

**COME** now **LUMA Energy, LLC** (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”) (jointly “LUMA”), and respectfully states and request the following:

1. On September 20, 2021, LUMA submitted the first Quarterly Performance Metrics Report that involves data collected by LUMA after Interim Service Commencement (“June through August Quarterly PM Report”).
2. On November 4, 2021, this Energy Bureau held a Technical Conference to discuss aspects of LUMA’s Quarterly Performance Metrics Submission of September 20, 2021 on several reliability metrics involving both the Transmission and Distribution System and Generation System. On November 9, 2021, LUMA submitted additional information that was requested by the Energy Bureau during the Technical Conference.
3. On December 14, 2021, the Energy Bureau issued a Resolution and Order on the Subject Matter of *Analysis of Performance Metrics for the Quarter of June through August 2021* (“December 14<sup>th</sup> Order”). On page 5 of the December 14<sup>th</sup> Order, this Energy Bureau indicated

that “Even with the restated SAIDI and SAIFI, LUMA's values for SAIDI and SAIFI, as reflected in Attachment A of this Resolution and Order, exceed the corresponding baseline. In other words, reliability was worse during the period corresponding to June, July and August 2021.” Meanwhile, on page 8, Attachment A of the December 14<sup>th</sup> Order, the Energy Bureau stated the following values for SAIFI:

<b>Metric</b>	<b>Unit</b>	<b>Baseline Values</b>	<b>Benchmark Values</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>
Annual SAIFI	Interruptions per customer	10.6	1.0	8.0	8.0	7.8	7.6

4. LUMA had to infer the calculation method applied by the Energy Bureau in the December 14<sup>th</sup> Order to determine the annual SAIFI values included in Attachment A, since no explanation was provided in the referenced Order. LUMA understands that the Annual SAIFI values stated in the December 14<sup>th</sup> Order are the rolling 12-month sum of the monthly values reported by the Puerto Rico Electric Power Authority (“PREPA”) through May 2020 and the monthly values reported by LUMA for June, July, and August 2021, with the ending month of each 12-month period being the month indicated by the column header for each annual value.

5. The monthly values reported by LUMA to this Energy Bureau are rounded to one decimal place. Summing these monthly values can lead to some roundoff errors as opposed to calculating the annual values from the raw data for the entire 12-month period.

6. While LUMA does not use a rolling 12-month comparisons of metric values and resulting conclusions that include time periods while the Transmission and Distribution System (“T&D System) was operated by PREPA, upon confirmation of the Energy’s Bureau’s conclusion,

it is respectfully submitted that the Energy Bureau's statement that the reported SAIFI values exceeded the baseline and were worse during the period of June, July, and August 2021, is incorrect, as shown by the values in the Energy Bureau's Attachment A. A decreasing value of SAIFI over time indicates an improvement, not a deterioration (as stated by the Energy Bureau). Regardless of reviewing the 12-month rolling calculation or the data points for June through August 2021, SAIFI performance improved. Please see Exhibit 1 for comparison detail supporting this statement.

7. LUMA requests that the Energy Bureau amend and clarify the May 14<sup>th</sup> Order to state that the SAIFI values reported by LUMA for the months of June through August, 2021 were below the baseline and that SAIFI values do not support the conclusion that reliability performance was worse during said period.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take** notice of the above and **amend and clarify** the May 14<sup>th</sup> Order to show that LUMA reported SAIFI values for the months of June through August, 2021 were below the baseline and that SAIFI values do not support the conclusion that reliability performance was worse during said period.

**RESPECTFULLY SUBMITTED.**

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) and the Independent Consumer Protection Office, through its Director, Hannia Rivera [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov).

In San Juan, Puerto Rico, this 21<sup>st</sup> day of March 2022.



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Exhibit 1

Excel Spreadsheet Submitted Via Email