

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

NEPR Received: Mar 21, 2022 11:53 PM

IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Quarterly Performance Metrics.

MOTION SUBMITTING QUARTERLY PERFORMANCE METRICS

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW, LUMA ENERGY SERVCO, LLC (“LUMA”), through the undersigned legal counsel and respectfully states and requests the following:

I. Introduction

The requirement to submit quarterly reports on specified system data of the of the Puerto Rico Electric Power Authority (“PREPA”), arises under a Resolution and Order issued by the Puerto Rico Energy Bureau (“Energy Bureau”) on May 14, 2019 in this proceeding. Pursuant to a Resolution and Order issued on December 30, 2020, the quarterly system data is due on the 20th day of the month after each quarter closes. LUMA hereby submits the quarterly report for the months of December 2021 through February 2022.

LUMA is committed to transparency and providing this Energy Bureau reliable data on the electric system in Puerto Rico. LUMA continues to review, refine and improve data collection processes to provide the Energy Bureau with the data points requested.

II. Current Measures of Performance

Based on current available information, the quarterly data shows that LUMA continues to make steady and positive progress in key areas like customer service, distributed generation capacity and reliability.

Regarding Customer Service, the Average Speed to Answer was reduced from an average of 14 minutes and 9 seconds from June through August 2021 to 50 seconds from December 2021 through February 2022 (94% improvement). The wait time in customer service centers decreased by 25% (from an average of 10 minutes and 29 seconds from June through August 2021, to an average of 7 minutes and 49 seconds from December 2021 through February 2022).

LUMA continued to stabilize the system during the past quarter, seeing a positive reduction in the frequency of outages island-wide (as measured by the System Average Interruption Frequency Index) from an average of 0.65 interruptions per customers in the period covering June through August 2021, to an average 0.53 interruptions per customers in the period from December 2021 through February 2022, a 18% reduction. LUMA also achieved improvements in the duration of outages system-wide (as measured by the System Average Interruption Duration Index) from an average of 177.24 minutes in the period from June through August 2021, to an average 96.89 minutes in the period from December 2021 through February 2022, a 45% reduction.

Regarding renewables, a 29% increase was reported on Total installed distributed generation capacity- Photovoltaic and a 45 increase on Total number of distributed generation installations- Photovoltaic. Since LUMA began operations in June 2021, distributed generation

has increased by nearly 42%, with LUMA connecting more than 17,000 customers with rooftop solar and adding more than 95 MW of renewable energy to the grid.

LUMA is committed to transparency and believes that all parties benefit from an accurate system data.

III. Background

On May 21st, 2021, this Energy Bureau issued a Resolution and Order establishing four categories of system data applicable to PREPA, among others (“May 21st Resolution and Order”). *See* May 21st Resolution and Order at pages 3-14. Per the May 21st Resolution and Order, LUMA and PREPA are to file quarterly reports on the statistics that are detailed in Attachments A, B and D of said Resolution and Order.

On June 22, 2021, LUMA submitted the quarterly performance metrics for the months of March, April and May 2021, with performance data prior to Interim Service Commencement which occurred on June 1, 2021. LUMA supplemented said filing on July 6, 2021 in a motion entitled *Motion Supplementing Quarterly Performance Metrics Report and Requesting Leave to Defer Reporting of Specified Metrics* (“July 6th Supplemental Submission”). In the July 6th Supplemental Submission, LUMA requested that the Energy Bureau defer the filing of data on several financial metrics for the month of May 2021.. LUMA also informed that due to circumstances beyond its control, it had not been able to gather and review relevant data on fleet operations and that the data is not reliable as maintenance records were not kept by PREPA and the work order system was not functioning.

On August 6, 2021, LUMA filed a motion entitled *Motion in Compliance with Order Submitting Updated Quarterly Performance Metrics Report* (“August 13th Updated

Submission”). In the August 13th Updated Submission, LUMA included clarifications on several new performance metrics that the Energy Bureau directed should be included in future quarterly reports and that are enumerated in Attachment D to the May 21st Resolution and Order. First, LUMA explained that regarding technical losses as % of net generation and technical loss reduction as a % of net generation, it computed values using PREPA’s methodology but that in LUMA’s view the data and methodology is not wholly reliable. LUMA offered to participate in collaborative discussions with the Energy Bureau on the methodology to be developed to track and report performance on technical losses as a percent of net generation and technical loss reduction as a percent of net generation. Second, regarding total of number of calls received, LUMA explained in the August 13th Updated Submission, that it expected that the data used by the Energy Bureau to set baselines would change significantly given that after commencing operations LUMA discovered that the call centers had trunks that limited how many lines were available for customers to call. Furthermore, LUMA requested clarification on the metric on average length of time to resolve customer complaint appeals.

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”). In the June through August quarterly data submission, LUMA added a tab in the summary worksheet to distinguish the metrics that pertain to Transmission & Distribution (which is operated and managed by LUMA) from those that involve Generation (which is operated and managed by PREPA). For the performance metric on number of formal customer complaints, LUMA clarified that the data submitted in Exhibit 1 reflects Act 57-2014 billing claims. LUMA explained that it would continue to follow PREPA’s

methodology for reporting on this metrics for consistency in the data. LUMA requested, however, that the Energy Bureau re-name this Performance Metric to number of Act 57 claims. LUMA proposed to eliminate that historical data as it is available on past submissions and to include in future reports solely the data since LUMA's commencement, June 2021 through Fiscal Year 2022.

LUMA also restated the request made in the August 13th Updated Submission for the Energy Bureau to clarify the data that is expected to be included in the new data request on the average length of time to resolve customer complaint appeals.

Furthermore, LUMA requested leave to file the data on financial metrics for the months of July and August in the next quarterly filing due December 2021.

Finally, LUMA requested to exclude from future quarterly submission several metrics as to which data was reported as "Non-Applicable" for 6 months or more, or the data remained unaltered for 6 months or more (Monthly Peak by Customer Class ; Monthly Peak by District; Number of Customer Complaints appealed by Customer Class; Average Time to Resolve Billing Disputes; Average Time to Respond to Service and Outage Complaints; Incremental Installed Distribution Generation Capacity per Year - Wind -; and Incremental Number of Distributed Generation Installations per Year -Wind-.)

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, Distribution System and Generation Systems. On November 9, 2021, LUMA submitted additional information that was requested by the Energy Bureau during the Technical Conference.

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 14th Order”). In the December 14th Order, this Energy Bureau issued rulings on several of LUMA’s prior requests regarding quarterly reporting duties and directed that the rulings shall apply for the next quarterly filing -due March 21, 2022-.

First, regarding those metrics that LUMA requested should be excluded from future quarterly filings, the Energy Bureau determined that it requires reporting on the metrics and indicated it is interested to know if LUMA has information that will supplement the metrics identified by the Energy Bureau. *See* December 14th Order at pages 3-4. However, this Energy Bureau acknowledged the request to exclude metrics on incremental capacity and quantity of what the Energy described as “wind type distributed generation systems.” Also, this Energy Bureau directed LUMA to identify what alternate information LUMA may provide on the metrics that it proposed to exclude and to file a plan and timeline by January 7, 2022, to report on the information.

Second, this Energy Bureau accepted LUMA’s methodology for calculating absenteeism. Third, this Energy Bureau accepted LUMA’s restated SAIDI and SAIFI values that include outages that had been historically excluded. This Energy Bureau directed that for the quarterly filing due March 2022, LUMA should clarify if the reported distribution metric is limited to distribution related outages and the reported transmission metric is limited to transmission related outages. *Id.* at page 5.

Fourth, this Energy Bureau accepted LUMA’s restated work order balance calculations. Fifth, regarding financial data, this Energy Bureau acknowledged that LUMA is making progress

to close financial books timely and apprised that delays could result in investigation or sanctions. *Id.* at page 6.

Finally, regarding fleet metrics, this Energy Bureau ordered that PREPA provide LUMA the fleet vehicle data in a timely manner and that LUMA include numbers for PREPA and LUMA vehicles in the metrics filings. *Id.*

In the December 14th Order, however, this Energy Bureau did not provide responses or clarifications to the following requests that were submitted by LUMA.

On December 22, 2021, LUMA submitted a *Motion Submitting Quarterly Performance Metrics, Requests for Amendments to Reporting Schedule on Certain Financial Metrics, Requests for Clarifications, and Requests to Substitute a Metric, Exclude Certain Metrics, and Rename Several Metrics* (“December 22nd Submission”).

On January 5, 2022, LUMA filed a *Request to Stay Portion of Resolution and Order of December 14, 2021, to identify Additional Information and Submit Plan to Produce Information on Specified Metrics, and Request for Extension of Time*. Among other requests, LUMA moved the Energy Bureau to stay compliance with portions of a Resolution and Order issued on December 14, 2021, that require LUMA to submit additional information and a plan to file reports on the following performance metrics: monthly peak by customer class, monthly peak by district, average time to resolve billing complaints, Number of Customer Complaints appealed by Customer Class, and Average Time to Respond to Service and Outage Complaints.

On January 21, 2022, LUMA submitted a plan to report on two metrics: Incremental Installed Distribution Generation Capacity per Year - Wind -, and Incremental Number of Distributed Generation Installations per Year -Wind-, commonly referred to as the wind metrics.

On January 31, 2022, the Energy Bureau issued a Resolution and Order, whereas it scheduled a Technical Conference for February 24, 2022, at 10:00 a.m. (“January 31st Order”). In the January 31st Order, the Energy Bureau expressed that it had identified a list of comments from the December 22nd Submission as to which it sought clarification from LUMA. The comments were included as Attachment A to the January 31st Order.

The Technical Conference was held as scheduled on February 24, 2022 (“February 24th Technical Conference”). LUMA representatives appeared and answered questions by Commissioners and also by Energy Bureau consultants. Performance statistics on the following areas were discussed: finance, customer service, transmission and distribution, operations, human resources and renewable energy and demand side management. On March 11, 2022, LUMA filed a *Motion in Compliance with Requests Issued in Technical Conference of February 24, 2022* (“March 11th Motion”), whereby it submitted additional information that was requested by this Energy Bureau during the February 24th Technical Conference on the following metrics: finance; customer service; monthly peak by customer class and monthly peak by district; inventory turn; turnover; and renewable energy.

As of the filing of this Motion and Quarterly Report, this Energy Bureau has not issued final rulings on LUMA’s requests that are detailed in the December 22nd Submission and that were presented during the Technical Conference of February 24th.

IV. Important Elements of the Quarterly Submission

With this Motion, LUMA is submitting the quarterly system data for the months of December 2021, January 2022 and February 2022.

Following the Technical Conference of February 24th, LUMA has removed all historical performance metric reporting prior to June 2021. Also, LUMA renamed the following metrics, as was stated in the December 22nd Submission and discussed in the February 24th Technical Conference:

- i. Number of Formal Customer Complaints was renamed as Number of Act 57 Claims,
- ii. Safety Recordables was renamed as OSHA Recordables,
- iii. Fuel Dispatch Accuracy was renamed as Fuel Expenditure vs. Forecast, and
- iv. Wait Time in Commercial Offices was renamed as Wait Time in Customer Service Centers

As LUMA explained during the February 24th Technical Conference and in Exhibit 1 to March 11th Motion, the submission of data on financial metrics tracks LUMA's proposal of an alternate schedule for reporting on specified financial metrics to align reporting in this proceeding with the new quarterly reporting duties on financial performance required by this Energy Bureau in Case NEPR-MI-2021-0004, *In Re Review of LUMA's Initial Budgets*; Case NEPR-MI-2020-0019, *In Re System Remediation Plan*, and Case NEPR-MI-2021-0002, *In Re Review of the Puerto Rico Electric Power Authority's 10 Year Infrastructure Plan*. Thus, the data on financial metrics submitted today, includes the months of October through December, 2021.

As discussed during the February 24th Technical Conference and explained in Exhibit 1 to the March 11th Motion, the Absenteeism metric was removed and replaced with the Turnover Rate metric.

The calculation of the Capital & Operating Expenses v. Budget metric was adjusted to convey budget reporting more accurately and be consistent with LUMA's Quarterly Report filings.

Regarding SAIDI and SAIFI reliability metrics, which are normally reported separately (Transmission & Substation and then Distribution), LUMA added two lines to include total SAIDI (Transmission & Distribution) as well as SAIFI (Transmission & Distribution) in addition to the pre-existing delineation.

The following adjustments were made to several of the customer service performance metrics:

- i. Number of Customers on AMI – two regions were added due to the additional AMI equipment available in Guánica and Peñuelas.
- ii. Number of Customer Complaints by Customer Class- LUMA began to report this value as of June 2021 by defining Customer Complaints as Act 57 Claims which are a reliable and trackable data point for this metric as an alternative to the complaint by class statistics. This metrics is proposed as an alternative to the metric on customer complaints appealed by customer class.
- iii. Average Time to Resolve Billing Complaints- for the purpose of calculating this metric, LUMA has defined Billing Complaints as Act 57 Claims, therefore, Average time to Resolve Billing Disputes was renamed to include Act 57 Claims. This metric is proposed as an alternative to the metric on average length of time to resolve customer complaint appeals.

- iv. Average Time to Respond to Service & Outage Complaints- LUMA is working to track service and outage complaints specifically and is working to report this metric from April 2022 forward.

LUMA is available to meet with the Energy Bureau and its consultants to discuss these customer service metrics.

Finally, as discussed during the February 24th Technical Conference, and in Exhibit 1 to the March 11th Motion, TC-RFI-LUMA-MI-19-0007-220224-PREB-006, additional metrics by region on Battery Energy Storage System, were added to the quarterly report.

V. Renewed Request for Delay

Regarding the metric on Percent of Automatically-Generated NTL leads found to be occurrences of theft, LUMA respectfully renews the request stated in the December 22nd Submission, to delay reporting. LUMA expects that it will be able to report this metric as more field operations teams complete trainings on technical investigations of energy irregularities and will keep the Energy Bureau informed of when it is in a position to report on this performance metric.

VI. Renewed Request to Exclude Metrics on Monthly Peak by Customer Class and Monthly Peak by District and Average Time to Resolve Billing Complaints and Renewed Request for Reconsideration.

LUMA respectfully renews its prior requests, including the request made in the December 22nd Submission, to exclude the performance metrics on monthly peak by customer class and monthly peak by district. As explained in Exhibit 1 to the March 11th Motion, TC-RFI-LUMA-MI-19-0007-220224-PREB-003, “LUMA Energy is unable to determine a Monthly Peak

either by customer class or by district for its entire customer base. This is due to the limitations of the metering infrastructure and the lack of a data warehouse to store data from meters.”

VII. Renewed Request for Adoption of Substitute Metrics

During the November 4th Technical Conference, this Energy Bureau requested that LUMA submit data on two metrics related to Human Resources: total budgeted head counts by employee type and total actual head counts by employee type. In the December 22nd Submission, LUMA proposed the following alternative metrics: total workforce and total open positions. LUMA renews this request. These two metrics will provide transparency by detailing LUMA’s current head count while at the same time sharing the positions that LUMA has active for recruitment.

WHEREFORE, LUMA respectfully requests this Honorable Bureau **take notice of the** aforementioned; **accept** the December 2021 through February 2022 Performance Metrics Report submitted via email; **accept** LUMA’s proposal for reporting on financial metrics; **issue** the clarifications requested in Section VI of this Motion; **grant** the delay requested in Section V of this Motion; **grant** the request for exclusion of metrics stated in Section VI of this Motion; and **grant** the request to substitute metrics stated in Section VII of this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of March, 2022.

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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Quarterly Performance Metrics Data and Supporting Files to be submitted via email in excel format