

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

**NEPR**

**Received:**

**Mar 3, 2022**

**9:52 PM**

**IN RE:** THE PERFORMANCE OF THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY

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

**SUBJECT:** Motion In Compliance With  
Bench Order And To Submit New And  
Revised Metrics Data

**MOTION IN COMPLIANCE WITH BENCH ORDER AND  
TO SUBMIT NEW AND REVISED METRICS DATA**

COMES NOW, the Puerto Rico Electric Power Authority (PREPA) through its undersigned legal representation and respectfully submits and prays as follows:

**I. INTRODUCTION**

1. On February 23, 2022, PREPA presented to the Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) a Motion to Submit PREPA September, October and November 2021 Performance Metrics (“February 23 Motion”). The February 23 Motion included a summary of PREPA’s performance metrics for the months of September, October and November 2021 (Attachment A) and supporting data for some of the reported metrics (Attachment B).

2. On February 24, 2022, PREPA officers appear at a Virtual Technical Conference during which the Energy Bureau asked several questions regarding the PREPA Metrics. Some of the PREPA Metrics questions and comments were addressed by PREPA’s agent, LUMA Energy,

LLC (“LUMA”) as operator of the T&D System<sup>1</sup> and as provider of several services through a Shared Services Agreement subscribed by PREPA and LUMA on June 2021.

3. During the Virtual Technical Conference, the Energy Bureau entered several bench orders that were to be complied with on or before today, March 3, 2022. PREPA herein addresses each request.

## **II. COMPLIANCE WITH BENCH ORDERS AND SUBMITTAL OF ADDITIONAL METRICS INFORMATION**

4. PREPA herein submits a revision to the summary of performance metrics submitted as Attachment A of the February 23 Motion. The revision includes the additional information requested by the Energy Bureau and also, additional information that PREPA deems necessary to provide the Energy Bureau with a more complete record.

### **a. Safety Metric**

5. During the Virtual Technical Conference PREPA was asked if it was possible that it submit the DART, Severity and Fatality for the period of February to May 2022. PREPA answered in the affirmative.

6. PREPA has included the DART, Severity and Fatality for the period of February to May 2022 in the Metrics Summary. Further, PREPA included DART, Severity and Fatality rates for the month of January 2021 and also, for the months of June, July and August 2021.

---

<sup>1</sup> T&D System is not limited to the transmission and distribution system and the scope of services that LUMA provides on behalf of PREPA is not limited to transmission and distribution assets and maintenance. The scope of LUMA’s services to PREPA can be found in the operation and maintenance agreement. *See*, Annex I, Sec. I (A), *Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement* dated as of June 22, 2020, by and among the Puerto Rico Electric Power Authority, the Puerto Rico Public-Private Partnerships Authority, LUMA Energy, LLC and LUMA Energy ServCo, LLC. Available for review at <https://www.p3.pr.gov/wp-content/uploads/2020/06/executed-consolidated-om-agreement-td.pdf> (Last visited on March 3, 2022).

**b. Fleet Metric**

7. PREPA did not submit the data for the Fleet Metric with the February 23 Motion. In the February 23 Motion PREPA explained that the data for the June to November 2021 period was not available. Further, PREPA explained that on June 1, 2021, referring to the day in which LUMA took control of the operation of different areas and services of PREPA as PREPA's agent, the Fleet Focus software, which was used to administer the PREPA fleet, was shutdown. PREPA added that this is the reason why it doesn't have the information to complete the June to November 2021 data, but that PREPA will begin recording the data to complete this metric in February 2022.

8. Thereafter, the Energy Bureau entered a bench order directing PREPA to explain what happened with the data from June 2021 to January 2022 and also, to provide details of the plan to commence the fleet reporting from February 2022 onwards.

9. After the last quarterly performance metrics hearing was held back in November 2021, PREPA filed a motion informing that it had 318 vehicles. *See, Motion in Compliance with Bench Order Entered on November 4, 2021.* However, that figure was not broken down into the details of the metric that the Energy Bureau asks to be reported (fleet out of service and total available vehicles in service). The 318 vehicles reported are vehicles for which PREPA budgeted for the current fiscal year.

10. As engineer Ricardo A. Figueroa explained to the Energy Bureau during the Virtual Technical Conference held on February 24, 2022, PREPA used to have a department dedicated exclusively to the administration of its fleet. The fleet administration was done through a fleet management software called Fleet Focus. Fleet Focus allows users to enter information about the vehicles assigned to them, report availability and also, request repair jobs. However, after

June 1, 2021, and to date, PREPA cannot access Fleet Focus. PREPA was informed by LUMA that Fleet Focus is still in PREPA's servers but is not currently active and LUMA is not using it. PREPA has verbally requested LUMA to transfer the software back to PREPA and PREPA would then update the system and purchase the license, if needed. As of today, PREPA has not been informed if LUMA will or won't allow PREPA to access the program. LUMA asked for a formal communication and PREPA is working with preparing the communication. However, any assistance from the Energy Bureau in the form of an order regarding this manner and directing turnover of PREPA's property to PREPA would be extremely helpful, cost and timesaving.

11. PREPA has considered acquiring a new fleet management software but, besides being an unnecessary expense since the Fleet Focus software that LUMA has under its control is property of PREPA, buying a new software would entail starting from scratch and entering all the fleet vehicle data in the new software. This is highly unnecessary. Again, the software that PREPA owns is still available to LUMA and a simple transfer would save rate payers' money, because PREPA wouldn't have to pay for a new software. The transfer of the software would also save time for PREPA officers who wouldn't have to enter all the fleet data in a new software from scratch.

12. In the meantime, PREPA is manually recording the fleet data requested by the Energy Bureau. PREPA's operation officers have created an excel template and all the areas report manual entries to a single point of contact designated by PREPA. This process is being done since February 2022. PREPA can confirm to the Energy Bureau that the reporting was successfully completed for the month of February 2022. However, since this is a manual

recording method, and PREPA hasn't had any other fleet recording method for the period of June 2021 until January 2022, PREPA cannot provide fleet metrics for those months.

**c. Planning and Environmental**

13. As explained during the Virtual Technical Conference, PREPA has not been able to record the emissions (tons) and emissions rate metrics (Ib/MMBTU) for the period of June 2021 to November 2021 and expects to report these months within the next two months. One of the reasons for not being able to complete this report is the lack of personnel that is needed to complete certain fuel reports that are warranted to report this metric. The officers that were tasked to complete these reports were transferred to other governmental agencies or resigned from PREPA, during the transition of certain operations to LUMA. Furthermore, the data base needed to provide both metrics was unavailable for a while and was corrected on February 10, 2022.

14. PREPA will provide an update of the status of the collection of information to report this metrics in March with the next quarterly submittal.

**d. Human Resources**

15. PREPA submitted the September - November 2021 human resources metrics with the February 23 Motion. However, after the filing, PREPA noticed that the figures submitted for the "Total budgeted headcounts" were incorrect.

16. PREPA herein submits the revised "Total budgeted headcounts" human resources metric for the period of September – November 2021. Further, even though the Energy Bureau did not request it during the Virtual Technical Conference, PREPA herein submits the "Total budgeted headcounts" and "Total actual headcounts" June, July and August 2021 data that was missing in the metrics summary.

### **III. COSTS AND EXPENSES METRICS NOT REPORTED**

17. Besides the metrics discussed above, PREPA did not report other metrics with the February 23 Motion submittal because these metrics are related to expenses and costs (*i.e.* Overall System metric and Generation (cost of generation)). These metrics are marked with “To be provided by LUMA through Finance Shared Service Agreement” in the comments’ column.

18. As the comment gives away, the final figures of these metrics should be provided by LUMA as the party responsible for providing finance services to PREPA through the Shared Services Agreement. PREPA disagrees with any proposal that includes LUMA passing final finance figures to complete these metrics and PREPA reporting those to the Energy Bureau. This is burdensome, inefficient, and uneconomical.

19. PREPA pays millions of dollars to LUMA for the shared services it must provide. The least that can be expected is that LUMA produce the information to the Energy Bureau as PREPA’s agent. Further, allocating this reporting responsibility on LUMA would separate PREPA from the tardiness and lag in the financial reporting which, as it was noted by the Energy Bureau during the Virtual Technical Conference, is already significant.

20. It must be noted that PREPA doesn’t seek to distance itself from cost and expenditures that are related to areas that it continues to operate. Should the Energy Bureau grant PREPA’s request to have LUMA report on costs and expenditures, PREPA would still be available to discuss any questions that the Energy Bureau may have regarding facts behind those metrics (*i.e.* reasons to expend in a repair to a generation asset).

### **IV. REQUEST FOR LEAVE AND/OR ORDER FOR PREPA TO REPORT SEPARATELY**

21. PREPA respectfully requests the Energy Bureau to allow-, or grant an order for-, PREPA to report its metrics. As done in the February 23 Motion, PREPA can report, file, and discuss with the Energy Bureau its own metrics. As shown during the Virtual Technical Conference, there is no overlapping metrics between PREPA and LUMA's and, thus, the metrics of each organization can be reported separately.

Should the Energy Bureau rule on PREPA's favor the request to have LUMA report all the metrics that are related to costs and expenditures, PREPA can report the rest of the metrics that are required by the Energy Bureau without any impediment.

**WHEREFORE**, PREPA respectfully requests that the Energy Bureau:

- a. take notice of this motion and the September, October and November 2021 PREPA revised performance metrics;
- b. determine that PREPA has complied with all the bench orders entered during the Virtual Technical Conference;
- c. order LUMA to report all of PREPA's costs and expenditures metrics; and
- d. grant leave to PREPA to file its performance metrics separately.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of March 2022.

/s/ Katuska Bolaños-Lugo  
Katuska Bolaños-Lugo  
[kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law)  
TSPR No. 18,888

**DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.**

290 Jesús T. Piñero Ave.  
Oriental Tower, Suite 803  
San Juan, PR 00918  
Tel. (787) 395-7133  
Fax. (787) 497-9664



**CERTIFICATE OF SERVICE**

It is hereby certified that, on this same date, I have filed the above motion with the Clerk of the Energy Bureau using the Energy Bureau's Electronic Filing System, at the following address: <http://radicacion.energia.pr.gov> It is further certified that I have sent a copy to [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com) and [mmercado@mercado-echegaray-law.com](mailto:mmercado@mercado-echegaray-law.com).

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of March 2022.

*/s Katuska Bolaños-Lugo*  
Katuska Bolaños-Lugo

Attachment A

*[The native version of this exhibit has been submitted to the Energy Bureau via email]*

## PREPA Quarterly Performance Metrics

<b>PREPA Personnel</b> Regulatory: Socorro de Lourdes Lugo Safety: Fernando Osorio Human Resources: Jorge Rios Generation: Jorge Cotto Environmental: Jose A. Santos Fleet: Ricardo A. Figueroa
<b>Email</b> <a href="mailto:lourdes.lugo@prepa.com">lourdes.lugo@prepa.com</a>
<b>Notes</b> Updated Though November 2021 Submitted on March 3, 2022

6/1/21 - LUMA Energy LLC Service Commencement Date

Metric	Sub-Group	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Comments
<b>Safety</b>								
OSHA Recordable Rate		6.55	6.29	6.08	2.19	5.66	6.35	
OSHA DART Rate		6.55	1.05	3.65	2.2	5.7	6.4	
OSHA Severity Rate		6.55	6.29	34.08	12.4	43	34.3	
OSHA Fatality Rate		0.00	0.00	0.00	0	0	0	
<b>Human Resources</b>								
Total budgeted head counts by employee type		1347.00	1347.00	1347.00	1347	1347	1347	
Total actual head counts by employee type		1503.00	1260.00	1260.00	1260	1181	1187	
Absenteeism		1.12%	0.96%	1.87%	23.52%	23.59%	24.75%	
<b>Overall System</b>								
Operational expenses vs. budget (excluding fuel) (system)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A01 Junta de Gobierno)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A02 Directorado Ejecutivo)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A04 Directorado Consultor Jurídico)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A05 Directorado Planificación y Protección Ambiental)		X	X	X	X	X	X	This service is provided by LUMA through the OMA
Operational expenses vs. budget (excluding fuel) (by directorate A07 Directorado de Finanzas)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A08 Directorado Administración de Operaciones e Infraestructura)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A09 Directorado Recursos Humanos)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A10 Directorado Sistema Eléctrico)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A11 Directorado Servicio al Cliente)		X	X	X	X	X	X	This service is provided by LUMA through the OMA
Operational expenses vs. budget (excluding fuel) (by directorate A12 Directorado Transmisión y Distribución)		X	X	X	X	X	X	This service is provided by LUMA through the OMA
Operational expenses vs. budget (excluding fuel) (by directorate A13 Responsabilidades Miscelaneas)								To be provided by LUMA through Finance Shared Services Agreement
Operational expenses vs. budget (excluding fuel) (by directorate A14 Responsabilidades Corporativas)								To be provided by LUMA through Finance Shared Services Agreement
Capital expenses vs. budget (system)								To be provided by LUMA through Finance Shared Services Agreement
Capital expenses vs. budget - Transmission & Distribution		X	X	X	X	X	X	This service is provided by LUMA through the OMA
Capital expenses vs. budget - Generation								To be provided by LUMA through Finance Shared Services Agreement
Capital expenses vs. budget- Customer Service		X	X	X	X	X	X	This service is provided by LUMA through the OMA
Capital expenses vs. budget- Administrative & General (Exec)								To be provided by LUMA through Finance Shared Services Agreement

Capital expenses vs. budget- Planning and Enviromental Protection		X	X	X	X	X	X	This service is provided by LUMA through the OMA
<b>Generation</b>								
Plant availability (system)		55%	55%	51%	49%	48%	57%	
Forced outages (system)		17%	23%	24%	35%	36%	30%	
Cost of generation (system total) AEE, exc. PPOA's gen								To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (system: fuel)								To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (system: O&M AEE, exc. PPOA's gen)								To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)								To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Steam - Fuel							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Gas - Fuel							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Steam - O&M							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Gas - O&M							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Steam - Total							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Gas - Total							To be provided by LUMA through Finance Shared Services Agreement
Cost of generation (by Plant Type)	Hydro Total							To be provided by LUMA through Finance Shared Services Agreement
Monthly thermal generation (system) AEE, excluding PPOA's gen		1,085.42	1,158.11	1,209.51	1,081.43	1,081.64	1,130.68	
Monthly thermal generation (by plant)								
Monthly thermal generation (by plant)	San Juan - Steam	40.87	58.92	61.97	37.89	80.62	91.10	
Monthly thermal generation (by plant)	Palo Seco - Steam	100.81	157.05	162.32	161.07	163.86	173.78	
Monthly thermal generation (by plant)	Costa Sur - Steam	405.08	447.20	389.25	98.83	184.49	206.92	
Monthly thermal generation (by plant)	Aguirre - Steam	176.64	143.95	172.53	290.01	251.40	342.48	
Monthly thermal generation (by plant)	Ciclo Combinado San Juan	255.79	250.85	267.61	259.76	239.54	206.41	
Monthly thermal generation (by plant)	Ciclo Combinado - Aguirre	56.74	48.00	51.43	114.91	78.03	50.69	
Monthly thermal generation (by plant)	Mayagüez - Gas	16.61	17.35	30.20	36.36	26.16	16.66	
Monthly thermal generation (by plant)	Palo Seco - Gas	6.40	6.38	12.33	13.49	5.41	5.09	
Monthly thermal generation (by plant)	Costa Sur - Gas	-	-	-	-	-	-	
Monthly thermal generation (by plant)	Aguirre - Gas	0.04	-	0.72	3.73	1.80	0.73	
Monthly thermal generation (by plant)	Yabucoa - Gas	-	-	0.03	0.01	0.46	1.77	
Monthly thermal generation (by plant)	Daguao - Gas	3.13	2.97	4.88	9.32	6.01	5.16	
Monthly thermal generation (by plant)	Jobos - Gas	3.37	4.74	8.08	10.40	5.04	4.32	
Monthly thermal generation (by plant)	Vega Baja - Gas	1.14	-	1.25	-	-	-	
Monthly thermal generation (by plant)	Cambalache - Gas	18.80	20.69	46.91	45.67	38.82	25.56	
Monthly thermal generation (by plant)	Vieques - Diesel	0.00	-	-	-	-	-	
Monthly thermal generation (by plant)	Culebra - Diesel	-	-	-	-	-	-	
Average heat rate (system)		10,660	10,695	10,830	10,828	10,833	11,097	
Average heat rate (by plant)								
Average heat rate (by plant)	San Juan - Steam	11,332	11,215	11,560	12,491	11,540	11,397	
Average heat rate (by plant)	Palo Seco - Steam	10,970	11,042	11,070	10,986	10,586	10,948	
Average heat rate (by plant)	Costa Sur - Steam	11,194	11,110	11,273	11,437	11,274	11,058	
Average heat rate (by plant)	Aguirre - Steam	11,299	11,357	11,188	11,235	11,540	11,308	
Average heat rate (by plant)	Ciclo Combinado San Juan	8,191	8,159	8,279	8,160	8,310	9,315	
Average heat rate (by plant)	Ciclo Combinado - Aguirre	13,293	14,588	14,459	13,195	13,601	15,449	
Average heat rate (by plant)	Mayagüez - Gas	10,865	10,317	10,455	10,605	10,971	9,828	
Average heat rate (by plant)	Palo Seco - Gas	15,342	15,679	15,447	15,625	15,932	15,820	
Average heat rate (by plant)	Costa Sur - Gas	0	0	0	-	-	-	
Average heat rate (by plant)	Aguirre - Gas	15,619	0	15,272	-	15,796	15,804	
Average heat rate (by plant)	Yabucoa - Gas	0	0	15,327	15,966	16,271	-	

Average heat rate (by plant)	Daguao - Gas	15,290	15,478	15,083	15,564	7,006	15,718
Average heat rate (by plant)	Jobos - Gas	14,687	14,835	14,840	14,780	14,961	15,070
Average heat rate (by plant)	Vega Baja - Gas	16,371	0	16,213	-	-	-
Average heat rate (by plant)	Cambalache - Gas	12,813	12,704	12,497	12,190	12,924	13,051
Average heat rate (by plant)	Vieques - Diesel	0	0	0	0	0	0
Average heat rate (by plant)	Culebra - Diesel	0	0	0	0	0	0
Plant availability (by plant)							
Plant availability (by plant)	San Juan - Steam	31%	27%	28%	27%	53%	0%
Plant availability (by plant)	Palo Seco - Steam	29%	44%	45%	51%	53%	62%
Plant availability (by plant)	Costa Sur - Steam	87%	97%	80%	20%	41%	48%
Plant availability (by plant)	Aguirre - Steam	40%	39%	36%	61%	50%	72%
Plant availability (by plant)	Ciclo Combinado San Juan	98%	91%	99%	97%	92%	0%
Plant availability (by plant)	Ciclo Combinado - Aguirre	41%	31%	21%	42%	32%	25%
Plant availability (by plant)	Mayagüez - Gas	45%	42%	27%	53%	35%	49%
Plant availability (by plant)	Palo Seco - Gas	33%	32%	31%	30%	19%	24%
Plant availability (by plant)	Costa Sur - Gas	0%	0%	0%	0%	0%	0%
Plant availability (by plant)	Aguirre - Gas	1%	3%	23%	25%	36%	26%
Plant availability (by plant)	Yabucoa - Gas	0%	0%	0%	0%	11%	99%
Plant availability (by plant)	Daguao - Gas	98%	98%	98%	95%	77%	97%
Plant availability (by plant)	Jobos - Gas	99%	98%	81%	80%	82%	93%
Plant availability (by plant)	Vega Baja - Gas	49%	0%	70%	70%	0%	0%
Plant availability (by plant)	Cambalache - Gas	100%	73%	79%	83%	100%	99%
Plant availability (by plant)	Vieques - Diesel	100%	100%	100%	57%	57%	57%
Plant availability (by plant)	Culebra - Diesel	100%	100%	100%	100%	100%	100%
Plant availability (by plant)	Hidro	33%	33%	33%	31%	28%	23%
Forced outages (by plant)							
Forced outages (by plant)	San Juan - Steam	9%	14%	14%	29%	41%	0%
Forced outages (by plant)	Palo Seco - Steam	17%	36%	37%	31%	36%	20%
Forced outages (by plant)	Costa Sur - Steam	2%	1%	15%	78%	59%	51%
Forced outages (by plant)	Aguirre - Steam	3%	11%	2%	7%	27%	11%
Forced outages (by plant)	Ciclo Combinado San Juan	1%	0%	0%	3%	8%	0%
Forced outages (by plant)	Ciclo Combinado - Aguirre	38%	40%	42%	16%	22%	35%
Forced outages (by plant)	Mayagüez - Gas	38%	44%	49%	45%	38%	38%
Forced outages (by plant)	Palo Seco - Gas	67%	67%	67%	69%	75%	76%
Forced outages (by plant)	Costa Sur - Gas	100%	100%	100%	100%	100%	100%
Forced outages (by plant)	Aguirre - Gas	99%	97%	77%	74%	57%	74%
Forced outages (by plant)	Yabucoa - Gas	100%	100%	100%	100%	87%	0%
Forced outages (by plant)	Daguao - Gas	0%	0%	0%	0%	0%	0%
Forced outages (by plant)	Jobos - Gas	0%	1%	18%	18%	1%	7%
Forced outages (by plant)	Vega Baja - Gas	50%	100%	29%	30%	100%	100%
Forced outages (by plant)	Cambalache - Gas	0%	0%	0%	1%	0%	1%
Forced outages (by plant)	Vieques - Diesel	0%	0%	0%	43%	43%	43%
Forced outages (by plant)	Culebra - Diesel	0%	0%	0%	0%	0%	0%
Forced outages (by plant)	Hidro	37%	37%	37%	39%	42%	47%

**Operations-Fuel**

MMBTU consumed	Diesel #2	1.87	1.38	2.22	3.30	3.10	3.42
----------------	-----------	------	------	------	------	------	------

Sept, Oct and Nov 2021 reported and entered by LUMA

MMBTU consumed	#6	3.42	3.78	4.74	5.08	5.15	5.15	Sept, Oct and Nov 2021 reported and entred by LUMA
MMBTU consumed	NG	5.68	6.57	5.50	5.26	5.38	5.38	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price	Diesel #2	15.85	16.15	16.34	18.44	18.70	18.94	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price	#6	10.52	12.73	12.61	13.39	14.33	13.75	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price	NG	10.07	10.87	11.48	12.34	13.52	13.36	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price vs. forecast price	Diesel #2	0.54%	2.44%	57.47%	46.79%	-4.43%	-4.58%	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price vs. forecast price	#6	-19.14%	-2.13%	46.85%	29.13%	-6.19%	-7.86%	Sept, Oct and Nov 2021 reported and entred by LUMA
Average price vs. forecast price	NG	2.65%	10.77%	27.03%	23.55%	-2.18%	0.87%	Sept, Oct and Nov 2021 reported and entred by LUMA

**Planning and Enviromental**

Timeliness of permitting - new and renewals	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
Emissions of SO2, Nox, CO2, PM, Hg and other regulated pollutants (system)	In Process	In Process	In Process	In Process	In Process	In Process	In Process
Emissions rates of SO2, Nox, CO2, PM, Hg and other regulated pollutants (system)	In Process	In Process	In Process	In Process	In Process	In Process	In Process
Carbon intensity of fossil generation	In Process	In Process	In Process	In Process	In Process	In Process	In Process

PREPA expects to report this metric within the next 2 months. The completion of this metric depends on Fuel Reports which have not be completed. Personnel in charge of completing these reports were mobilized to another agencies after the transition with LUMA. Furthermore, the database needed to provide this information had been unavailable and was recently corrected (as of 2/10/2022).

**Operations-Fleet**

Fleet out of service (system)	Not available	lot available	lot available	lot available	lot available	lot available	lot available
Total available vehicles in service (system)	Not available	lot available	lot available	lot available	lot available	lot available	lot available

The data for this period is not available. As of June 1, 2021, once LUMA began operations, the Fleet Administration program "Fleet Focus" was shutdown, hence we do not have the data needed to work on the previous months metrics. PREPA will begin recording this metric on February 2022.