

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

NEPR Received: Sep 23, 2022 2:51 PM
--

IN RE: INTERRUPCIÓN DE SERVICIO
ELÉCTRICO DE 6 DE ABRIL DE 2022

CASE NO. NEPR-IN-2022-0002

SUBJECT:

**Informative Motion on Submittal of Root
Cause Analysis**

**INFORMATIVE MOTION ON SUBMITTAL OF
ROOT CAUSE ANALYSIS**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** (“ManagementCo”) and **LUMA Energy ServCo, LLC** (“ServCo”) (jointly referred to as the “Operator” or “LUMA”), and respectfully state and request the following¹:

1. On April 6th 2022, a failure in the electric system led to a fire at the Costa Sur transmission substation, which resulted in a power outage of the entire electrical system (hereinafter, the “April 6th Incident”).

2. On April 8th 2022, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order whereby it initiated an investigation of the April 6th Incident (“April 8th Order”).

3. On April 12th, 2022, in compliance with the April 8th Order, LUMA submitted the Preliminary Report of the April 6th Incident. The Preliminary Report included the information that

¹ Capitalized terms not defined herein shall have the meaning ascribed to them in LUMA’s *Motion Submitting Updated Report and Request for Confidential Treatment*, filed in this Energy Bureau on April 18th, 2022.

LUMA had gathered thus far, preliminary findings and assessments of the April 6th Incident, and a summary of the corrective actions taken by LUMA.

4. On April 14th, 2022, to aid the Energy Bureau in its investigation and supplement the Preliminary Report, LUMA filed a *Motion to Supplement Preliminary Report on April 6th Incident*. Therein, LUMA submitted two (2) video recordings, including a screen recording from the Costa Sur transmission substation that shows a few minutes before and after the failure of oil circuit breaker number 0082 at the Costa Sur Substation's 230kV switchyard on April 6th, and an aerial view video of the Costa Sur Substation taken the morning after the April 6th Incident.

5. On April 18th, 2022, in compliance with the April 8th Order and to be transparent with its customers and regulators about its operations, LUMA filed a *Motion Submitting Updated Report and Request for Confidential Treatment*. Therein, LUMA submitted the Updated Report of the April 6th Incident, which provided an update on the following topics:

- i. Overview of third-party industry expert hired to assist with analysis;
- ii. Outage investigation update and proactive maintenance plan/strategy;
- iii. System analysis update including adding dynamic stability analysis into model; and
- iv. Ongoing restoration activities at Costa Sur.

6. On April 22nd, 2022, the Energy Bureau issued a Resolution and Order instructing LUMA and PREPA to submit, on or before May 6th, 2022, at noon, certain documents and information in connection with the April 6th Incident ("April 22nd Order").

7. On May 9th, 2022, LUMA submitted all documents and information in its possession, custody, and control, which were responsive to the Energy Bureau's requests for documents and information. They included a sworn statement signed by Darrell Wilvers, LUMA's

Director of Asset Management, stating that the documents produced were exact copies of the original documents and that the information provided was true and correct. Further, LUMA also submitted a Second Updated Report of the April 6th Incident, which provided an update on the schedule and status of the investigation.

8. In the Second Updated Report of the April 6th Incident, LUMA informed the Energy Bureau that the remaining elements of the investigation schedule included a Root Cause Analysis that would be submitted on or before September 23, 2022.

9. LUMA has been working diligently to finalize the Root Cause Report Analysis. However, the unforeseen event beyond LUMA's control of the passage through Puerto Rico of Hurricane Fiona on September 18, 2022, required the deployment of LUMA's workforce to prepare for and address an island-wide emergency, resulting in an unforeseen delay in gathering the information needed to finalize the report. Due to these circumstances, LUMA needs additional time to submit the report. As this Energy Bureau has been made aware, the April 6th Incident is part of an ongoing investigation to which the pertinent LUMA employees devote a substantial effort. In view of the aforementioned, LUMA respectfully informs the Energy Bureau that it will submit the Root Cause Analysis on or before October 7, 2022.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this motion to the attorney for PREPA, Bolaños-Lugo, kbolanos@diazvaz.law.

In San Juan, Puerto Rico, this 23rd day of September 2022.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107/ 9132
Fax 939-697-6147/ 6102

/s/ Yahaira De la Rosa Algarín
Yahaira De la Rosa Algarín
RUA NÚM. 18,061
yahaira.delarosa@us.dlapiper.com

/s/ Iván Garau-González
Iván Garau-González
RUA NÚM. 20,229
ivan.garau@us.dlapiper.com