

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

NEPR

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IN RE:

REVIEW OF THE PUERTO RICO ELECTRIC
POWER AUTHORITY'S SYSTEM
REMEDICATION PLAN

CASE NO. NEPR-MI-2020-0019

**SUBJECT: Annual System Remediation Plan Report
for FY2022**

**MOTION SUBMITTING LUMA'S ANNUAL SYSTEM REMEDIATION PLAN
REPORT FOR FY2022**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo"), (jointly referred to as "LUMA"), and respectfully state and request the following:

1. On June 23, 2021, this honorable Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued and published a Resolution and Order approving LUMA's System Remediation Plan ("June 23rd Order"). In Section IV, paragraphs 1 through 3 of the June 23rd Order, this honorable Energy Bureau directed that, starting on September 15, 2021, LUMA shall file reports every two months on the implementation of the SRP that shall include:

- i. Actual spending amounts, broken down by spending initiative/portfolio, and reflecting in detail any variances from the System Remediation Plan;
- ii. A detail[ed] timeline per portfolio with sufficient detail to allow the Energy Bureau to assess project status for System Remediation Plan capital expenditures and operational initiatives; and
- iii. Any capital expenditure or operational initiatives that are behind schedule, compared to the initial System Remediation Plan timeframe and a detail[ed]

explanation as to the cause of the delay and the corrective actions implemented to prevent further delays, as applicable.

Id.

2. On August 25, 2021, the Energy Bureau issued a Resolution and Order (“August 25th Order”) modifying the bimonthly reporting requirement to a quarterly basis and establishing a filing due date for these reports of thirty (30) days following the close of the reported quarter. *See* August 25th Resolution and at p. 3. Thereafter, on November 4, 2021, this Energy Bureau issued a Resolution and Order (the “November 4th Order”) establishing a filing date for these reports of forty-five (45) days after each quarter closes. *See* November 4th Order at p. 2.

3. In compliance with the June 23rd Order, as modified by the August 25th Order and the November 4th Order, LUMA submitted three quarterly reports for the Fiscal Year 2022 on November 15, 2021 (“Q1 Report”); February 15, 2022 (“Q2 Report”), and May 16, 2022 (“Q3 Report”) (jointly, “the Quarterly Reports”). The Quarterly Reports that have been filed in this proceeding also addressed quarterly reporting requirement set in Case No. NEPR-MI-2021-0004, *In Re: LUMA’s Initial Budgets* (“Initial Budgets Proceeding”) and Case No. NEPR-MI-2021-0002, *In Re: Review of Puerto Rico Electric Power Authority’s 10 Year Infrastructure Plan* (“10 Year Plan Proceeding”). The Quarterly Reports cover the information regarding the T&D System Initial Budget spending amounts, SRP activities and spending and the information on federal funding activity. Therefore, LUMA submitted the same in the dockets of the Initial Budgets Proceeding and the 10 Year Plan Proceeding.

4. On April 14, 2022, LUMA submitted a motion styled “Motion Submitting Proposed Modifications to System Remediation Plan and Request for Confidential Treatment” (“Request to Modify the SRP”). As the title of the Request to Modify the SRP stated, LUMA submitted for

consideration by this Energy Bureau, a request to modify the SRP in compliance with the June 23rd Order. Said Request is pending adjudication by this Energy Bureau.

5. On August 12, 2022, LUMA submitted with this Energy Bureau a “Request to Align the Filing of Quarterly Report for Fourth Quarter of Each Fiscal Year “Q4 Report”) with Year-End Reporting under the T&D OMA and to File the Q4 Report on October 28, 2022 (“Request for Alignment”). Thereafter, on August 31, 2022, this Energy Bureau denied LUMA’s Request for Alignment and directed that LUMA shall file the Q4 Report by September 7, 2022 (the “August 31st Order”).

6. On September 6, 2022, LUMA filed before the Energy Bureau a *Motion for Partial Reconsideration of Resolution and Order of August 31, 2022 and Proposing Alternative Schedule for Submission and Consideration of Quarterly Report* ("September 6 Motion"). Therein, LUMA requested that the Energy Bureau reconsider the August 31 Resolution; alter the schedule for the submission of the Q4 Report; and grant a delay for LUMA to submit it on or before October 28, 2022.

7. On September 16, 2022, this Energy Bureau issued a Resolution and Order, denying the September 6 Motion. In turn, it granted LUMA until September 26, 2022, to file the Q4 Report.

8. Given the unforeseen event beyond LUMA’s control of the passage through Puerto Rico of Hurricane Fiona on September 18, 2022, on September 23, 2022, LUMA requested additional time beyond September 26th for LUMA’s personnel to finalize duties in LUMA’s Emergency Operations Center, rest, and return to their non-emergency duties to work on the Q4 Report. In good faith, LUMA estimated that it would require an additional month, at minimum, following the conclusion of restoration efforts related to Hurricane Fiona to prepare and submit the Q4 Report.

9. LUMA hereby submits its *Annual System Remediation Plan Report* for FY2022 ending June 30, 2021 (“Annual SRP Report”), which includes Q4 financial data and results.

10. The Annual SRP Report details LUMA’s progress during FY2022 to advance the SRP Programs in furtherance of the proposed remediated states and identifies those SRP Improvement Programs that reached remediated state, as well as milestones that were completed for SRP Improvement Programs in FY2022.

11. Finally, the Annual SRP Report details SRP FY2022 spending per each of the Improvement Portfolios and actual spending for each of the SRP Improvement Programs for FY2022. As stated in the Annual SRP Report, the financial information provided has not been subject to audit and is not appropriate for unintended purposes.

WHEREFORE, LUMA respectfully requests that the honorable Bureau **take notice** of the aforementioned for all purposes.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of December 2022.

I hereby certify that this motion was filed using the electronic filing system of this Energy Bureau. I also certify that copy of this motion will be notified to the Puerto Rico Electric Power Authority, through its attorneys of record: jmarrero@diazvaz.law and kbolanos@diazvaz.law.



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Exhibit 1
Annual SRP Report



LUMA Annual System Remediation Plan Report

For Fiscal Year 2022
Ending June 30, 2022

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We're here to deliver on the mission for Puerto Rico

The 3,000 men and women of LUMA are proud to serve the people of Puerto Rico and of the efforts we have made to fundamentally transform and modernize the energy grid. While our first fiscal year has brought many challenges as a result of an electric system that has suffered years – if not decades – of neglect from the prior operator, we have made real and measurable progress.

In Fiscal Year 2022, and 13 months after assuming operation of the transmission and distribution system, we have made material progress to remediation. This includes significantly improved worker safety, accelerated FEMA projects and launched the \$1 billion Community Streetlight Initiative (Distribution Streetlight program), reduced the frequency of outages by 30%, established the LUMA College of Technical Training and graduated the next generation of skilled workforce, and created new tools and resources for our customers, including the Mi LUMA app, and dramatically reduced customer call wait times. In fact, LUMA has remediated four programs including those to improving our communication with customers, implementing a fully integrated safety and operational management system, launching a competitive employee benefit program and completed core compliance training and developed processes for our System Operators. This is just the beginning – we know we have more work to do. The LUMA team is excited about the future, and we are absolutely committed to delivering on our mission of building a better energy future for our 1.5 million customers.

LUMA operates government-owned transmission and distribution assets under a long-term agreement administered as part of a public-private partnership overseen by the P3 Authority and subject to regulatory oversight by the Puerto Rico Energy Bureau. This report outlines our key activities for Fiscal Year 2022, from July 1, 2021, to June 30, 2022.

Prioritizing Safety

We're getting workers the training they need to be effective while staying safe. We continue to see improvement in key safety metrics, including an 82% improvement in injury severity.

System Rebuild and Resiliency

We're repairing the most critical grid assets and advancing federally funded capital projects through design and engineering, including the launch of our \$1 billion+ Community Streetlight Initiative, replacing 12,000+ streetlights.

Improving Customer Satisfaction

We continue to create new paths to listen and respond to customers, including active engagement with Puerto Rico's 78 municipalities and customer-informed improvements to the Mi LUMA application.

Operational Excellence

We grew our skilled workforce through an expanded focus on specialized training, such as the development of an accredited apprenticeship and upskilling program and deployed our workforce more efficiently with process improvements.

Sustainable Energy Transformation

We continue to advance renewable energy in Puerto Rico by activating approximately 27,000 solar installations and collaborating in groundbreaking initiatives such as PR100.

Our Mission for Puerto Rico

To recover and transform the utility to deliver customer-centric, reliable, resilient, safe, and sustainable electricity at reasonable prices



PRIORITIZE SAFETY

Reform utility activities to support a strong safety culture focused on employee safety and the safety of the people of Puerto Rico



IMPROVE CUSTOMER SATISFACTION

Transform utility operations to deliver a positive customer experience and reliable electricity at reasonable prices



SYSTEM REBUILD & RESILIENCY

Effectively deploy federal funding to restore the grid and improve the resilience of vulnerable infrastructure



OPERATIONAL EXCELLENCE

Enable employees to pursue operational excellence through new systems, processes, and training



SUSTAINABLE ENERGY TRANSFORMATION

Modernize the grid and the utility to enable the sustainable energy transformation

Remediated State Achieved: **Modernize Customer Service Technology Program**

- LUMA's Modernize Customer Service Technology program has reached **remediated state**
- The program has been focused on the development and implementation of a **new cloud-based contact center platform**
- Customers used to get a busy signal when they called PREPA and now, following implementation of this program, **LUMA answers every call at all times of day on every day of the year**
- This program enabled contact center agents to use a cloud-based contact center platform in daily operations and emergencies through **modernized tools, software and training**
- In emergencies like Hurricane Fiona, this program enables LUMA to tie in **emergency contact center support from anywhere**, on-island or off-island, to serve LUMA customers better when they need it most
- This program has enabled **multiple contact centers** to operate around the island from multiple locations to ensure that LUMA agents are always available



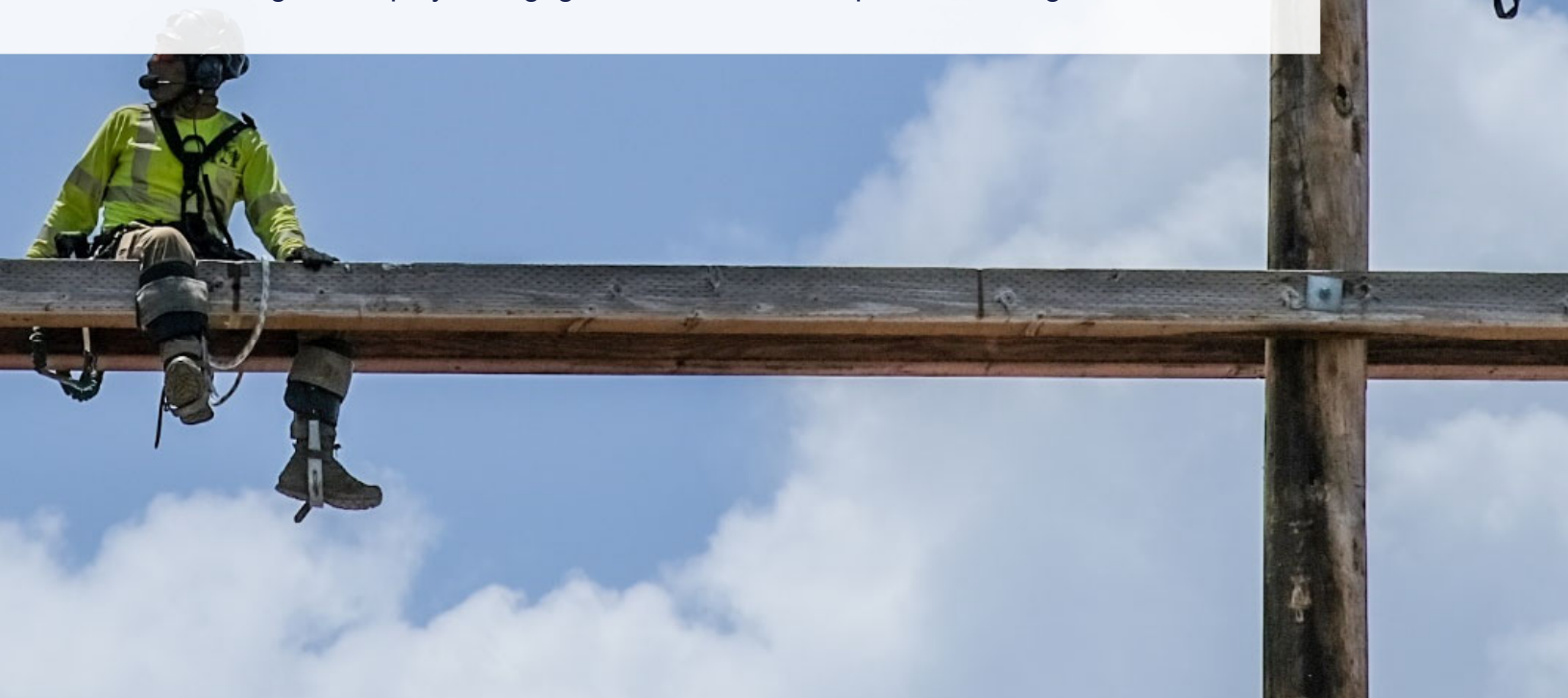
Remediated State Achieved:

Integrated Safety & Operational Management System Program

- LUMA's Integrated Safety & Operational Management System program has reached **remediated state**
- This program focused on the development and implementation of a fully integrated internal **safety and operational management system**
- Prior to LUMA commencing operations and implementing this program, **no systems were in place to track or investigate safety incidents**
- Previously, PREPA **did not investigate personal injuries to employees or vehicle incidents** and minimal environmental releases were being tracked or reported
- **Safety data was not generated accurately** due to the lack of systems, processes, and procedures
- Now, with the implementation of this program, **LUMA is able to track, investigate, and report safety incidents and environmental releases** as required and generate accurate safety metrics
- This program enables LUMA to learn from incidents and **continuously improve safety** while also achieving compliance requirements

Remediated State Achieved: **Human Resources Program**

- The Human Resources Program has **reached remediated state**
- This program implements an **employee benefit** program, an **employee engagement** strategy, core compliance training and human capital management software
- Prior to LUMA commencing operations and implementing this program, PREPA offered an **expensive, out of date, self-funded and underfunded employee benefits** that was not understood by employees and was difficult to administer
- Previously HR systems had no self-serve capabilities and lacked employee performance, compensation, and development management capabilities
- Now, since the implementation of this program, LUMA provides **industry-leading health and welfare benefits and professionally managed 401k** including medical and dental with the **largest provider network in Puerto Rico**
- LUMA utilizes a **modern information system** for many HR processes and conducts regular employee engagement and core compliance training activities



Remediated State Achieved: **Critical System Operation Strategy and Processes Program**

- Earlier than projected, the Critical System Operation Strategy and Processes program **reached remediated state**
- This program develops the procedures and strategies necessary to **operate the electrical system reliably and efficiently**
- Prior to LUMA commencing operations and implementing this program, **PREPA did not have any documented procedures to operate the bulk electric system**
- System operations processes were transmitted informally from more experienced employees to others, and this resulted in **erosion of institutional knowledge** as well as expertise was highly individualized
- PREPA's ability to perform necessary functions was **dependent on which individual employees were working** in the Control Center at that specific time
- Now, with the implementation of this program, LUMA has the necessary strategy and processes in place to operate the system **safely, reliably, and efficiently** regardless of which LUMA employee is working in the Control Center
- This program has enabled LUMA to be **better prepared for situations like Hurricane Fiona and the April 6th, 2022 Outage** when critical procedures like the blackstart procedure are necessary

FY2022 Key Remediation Achievements

- Started the monumental task of **stabilizing the T&D System**
- Ensured the **LUMA Fleet meets all compliance requirements**
- Set up vehicle **maintenance shops across the island**
- **Outsourced the bill print and delivery function** to reduce risk and improve customer experience
- Provided **significant on-the-job and in-class training and mentorship** for employees across the organization
- Developed engineering standards
- **Advanced federally funded work** and established pipeline of capital projects
- Substantially **improved safety performance**
- **Detangled system customizations** and manual work arounds
- **Built foundational and instrumental processes** and models
- Established **proper processes and controls** required for federal funding and prudent utility operation
- Started training System Operators on **critical system operations procedures** like the blackstart procedure

System Remediation Plan Advancements in FY2022

During the first fiscal year of operations, LUMA's more than 3,000 hard-working men and women continued to build a more reliable, more resilient and more customer-focused and cleaner energy system for our customers and the people of Puerto Rico. The System Remediation Plan (SRP) describes LUMA's coordinated actions to remediate, repair, replace and stabilize the Puerto Rico Transmission & Distribution System (T&D System) equipment, systems, practices, and services. The initiatives are foundational to the transformation of the Puerto Rico T&D System and address the highest risk aspects of the utility. Remediating the SPR programs will enable LUMA to operate and maintain Puerto Rico's electricity system in compliance with industry standards, contractual requirements, and Applicable Laws. This document presents LUMA's SRP Annual Report on remediation progress to the T&D System for Fiscal Year 2022 (FY2022), which covers the period July 1, 2021 to June 30, 2022.

LUMA operates the T&D System in accordance with the Puerto Rico T&D System Operation and Maintenance Agreement (T&D OMA) executed by the Puerto Rico Electric Power Authority (PREPA), the Puerto Rico Public-Private Partnerships Authority (P3A), LUMA Energy and its subsidiary LUMA Energy ServCo, LLC (LUMA) and dated as of June 22, 2020. As stated in Section 4.1(d)(i) of the T&D OMA, "certain components of the T&D System and the manner in which the T&D System is operated do not currently meet the standards of performance required under [the T&D OMA]". The SRP establishes "a plan to remediate, repair, replace and stabilize T&D System equipment, systems, practices and services, as may be needed, to enable [LUMA] to perform the O&M Services in compliance with the Contract Standards" (T&D OMA, Section 4.1 (d)(ii)).

After decades of neglect and mismanagement compounded by damages from Hurricanes Irma and María in 2017, and earthquakes in late 2019 and early 2020, when LUMA began operations in June 2021 the T&D System physical assets were in very poor condition. The inadequate maintenance and subsequent storm damage had corresponding effects on system performance and reliability. Additionally, organizational systems, processes, and procedures were either non-existent or highly deficient, and nearly all organizational systems and processes required substantial changes or complete replacement to enable more systematic, standardized, and cost-effective deployment of resources and capital.

The Puerto Rico Energy Bureau (PREB) approved SRP is LUMA's plan to address areas that are below standard and pose the highest risk to customers, employees, and the electrical system. The SRP is a critical part of a broader set of improvement activities to recover and transform the grid. The purpose of the SRP, as outlined within the SRP submitted on February 24, 2021, is to provide an appropriate transition from the current state where utility assets and activities are not compliant with Contract Standards, including Prudent Utility Practice, to one where the minimum conditions are met for Contract Standards, including Prudent Utility Practice. This transition to minimum conditions, known as a remediated state, is specific to the identified activities and assets and, as such, will end based on the attainment of certain milestones identified in the SRP Improvement Programs that are specific to those assets and activities. Improvement Program activities may continue after attainment of a remediated state in order to continue elevating performance and compliance above the minimum conditions.

Since starting operations on June 1, 2021, LUMA discovered unexpected deficiencies that were not disclosed during the Front-End Transition (FET) period due to PREPA's lack of cooperation and omissions. The extent of these deficiencies across the T&D System and in the inherited systems and processes resulted in adjustments to planned activities in the

initial year of operations and resulted in LUMA completing more foundational activities than expected to ensure minimum performance would be met and progress could be made in future fiscal years. Deficiencies discovered in FY2022 have been summarized in LUMA's FY2022 quarterly and annual reports and include, but are not limited to, the following:

- Non-functioning electrical assets and equipment including 29 non-functioning substations
- Broad and significant call center and Customer Care & Billing (CC&B) limitations
- Marginally operable Outage Management System (OMS)
- Isolated and inaccurate Asset Management (AM) system with incomplete upgrades at the commencement and lack of current asset records
- Lack of documented current processes and procedures
- Critically insufficient technical and safety training for employees
- Lack of recent and relevant operational and industry-standard training and skills
- Lack of asset information, inaccurate system models
- Non-standard configuration, segregation, manual overrides, and out-of-date operating Information Technology and Operational Technology (IT OT) systems, causing instability and weakness that directly impact service and reporting

PREPA's deficiencies identified since June 1, 2021, combined with those assessed during the FET, represented serious risks to operations that LUMA was required to address. To help improve the overall energy system and practices that are crucial to building a world-class utility in Puerto Rico, LUMA successfully started to address many of these obstacles and made significant progress. LUMA's early actions include providing significant training for its employees, starting the monumental task of stabilizing systems, improving safety, unwinding system customizations and manual workarounds, building foundational and instrumental processes and models and establishing the proper processes and controls required for federal funding and prudent utility operation. During the first year of operations, LUMA uncovered many details and undisclosed deficiencies of the T&D System and made adjustments in order to address these. Correspondent adjustments were made to the FY2023 SRP in the Motion of Proposed Modifications to System Remediation Plan submitted to the PREB on April 14, 2022¹.

In addition, progress on Federal Funding activities was impacted by PREPA's inaction on preliminary planning and engineering during the first five months of 2021 in advance of LUMA's June 2021 commencement date. This significantly impacted LUMA's ability to spend federally funded dollars as there was significant work required to lay the foundation and set up the pipeline to be able to progress federally funded projects to recover from Hurricane Maria. It is important to note that 61% of the estimated SRP spend for FY22 was planned to be federally funded and, thus, slowed progress of the SRP overall. Although federal funding activities were not as far along as anticipated when LUMA took over operations, LUMA was able to make significant progress throughout the fiscal year to catch up and obtained 15 funding obligations from the Federal Emergency Management Agency (FEMA).

The 46 SRP Improvement Programs are organized under portfolios corresponding to the utility assets and activities. These are:

- Customer Experience
- Distribution
- Transmission
- Substation
- Control Center & Buildings
- Enabling, and
- Support Services.

¹ The Motion Submitting Proposed Modifications to System Remediation Plan was submitted to the PREB under docket NEPR-MI-2020-0019 on April 14, 2022.

In spite of an array of ongoing and documented challenges associated with the incredibly fragile state of the T&D System stemming from years –if not decades –of neglect by the prior operator, LUMA remained focused on making real and measurable progress to remediation activities in pursuit of the remediated state for all SRP programs.

PROGRAMS REACHING REMEDIATED STATE IN FY2022

In FY2022, in its first year of operation, LUMA achieved remediated state for a total of four of its Improvement Programs including the following:

- Modernize Customer Service Technology
- Integrated Safety & Operational Management System
- Human Resources (HR) Programs
- Critical System Operation Strategy and Processes

The **Modernize Customer Service Technology** program is primarily focused on remediating telephony focused on receiving and responding to customers through call center systems. This includes the development and implementation of a new cloud-based contact center platform. Prior to LUMA commencing operations and implementing this program, PREPA had only 500 trunk phone lines limiting the number of customers that could call in. This meant that when the lines were full customers would receive a busy signal and have no choice but to call back at a later time. Following implementation of this program, LUMA can now answer every call at all times of day on every day of the year. This program has enabled LUMA to operate multiple contact centers to operate around the island from multiple locations to ensure that customers can always contact a LUMA customer service representative. LUMA can also now tie in emergency contact center support from anywhere to serve LUMA customers better when they need it most. The new functionality was successfully deployed during Hurricane Fiona.

Remediation activities completed in FY2022 include enabling contact center agents to use a multi-channel cloud-based contact center platform in emergencies and daily operations through modernized tools, software and training. Consistent with Act 17-2019, LUMA has adopted new technologies to improve and minimize wait times for customers. As outlined in the T&D OMA, customer relationships are conducted in compliance with Applicable Laws and LUMA has established and maintained customer contact through call centers and as such, this program reached remediated state as projected in FY2022. While this program has reached remediated state, additional non-SRP improvement activities are still in progress including those focused on Interactive Voice Response, quality assurance, reporting, and training.

The **Integrated Safety & Operational Management System** program centralizes policy and procedure creation by using a fully integrated, efficiently managed internal safety and operational management system that will allow communication of requirements to all employees and monitor health, safety and environmental compliance across LUMA. Prior to LUMA commencing operations and implementing this program, no systems were in place to track or investigate safety incidents. PREPA did not investigate personal injuries to employees and minimal environmental releases were tracked or reported. Additionally, investigations were not completed in the case of vehicle incidents. Safety data was not generated accurately due to the lack of systems, processes and procedures and PREPA was unable to learn from common issues as a result.

Now, with the implementation of this program, LUMA is able to track, investigate, and report safety incidents and environmental releases as required and generate accurate safety metrics. Remediation activities completed in FY2022 include establishing systems and processes to accurately and consistently track and report safety incidents and metrics, consistent with the T&D OMA. LUMA also now can conduct root cause analysis and develop corrective actions, in accordance with industry practice. Occupational injuries and illnesses, and environmental spills and releases are reported in compliance with Applicable Laws and regulations. This program was projected to reach remediated state at the beginning of FY2023 but reached remediated state earlier than projected in FY2022. While this program has reached remediated state, additional non-SRP improvement activities are still in progress including additional improvements to technological systems, procedures, processes, and record keeping.

The **HR Programs** program includes activities to implement an employee benefit program, an employee engagement strategy, core compliance training and human capital management software. Prior to LUMA commencing operations and implementing this program, PREPA offered an expensive, out of date, self-funded and underfunded defined benefit pension system that was not understood by employees and was difficult, costly, and risky to administer. PREPA's HR systems did not have any self-serve capabilities and lacked employee performance, compensation, and development management capabilities. PREPA lacked documented policies and procedures and all HR process were manual.

Now, since the implementation of this program, LUMA provides industry-leading health and welfare benefits including medical and dental with the largest provider network in Puerto Rico. LUMA utilizes a modern information system for many HR processes and conducts regular employee engagement and core compliance training activities. Remediation activities completed in FY2022 include providing company-wide core compliance training. This program reached remediated state as projected in FY2022. While this program has reached remediated state, additional non-SRP improvement activities are still in progress including training activities, employee engagement activities and improvements to the HR Information System.

The **Critical System Operation Strategy and Processes** program develops procedures and strategies necessary to operate the bulk electrical system reliably and efficiently. This includes procedures and strategies associated with managing blackstart, load shedding, outage management, transmission lines, substations, distribution and the training on the Outage Management System. Prior to LUMA commencing operations and implementing this program, PREPA did not have any documented procedures to operate the bulk electric system. System Operations processes were transmitted informally from more experienced employees to others, and this resulted in erosion of institutional knowledge as well as expertise was highly individualized, and processes were not standardized. PREPA's ability to perform necessary functions was dependent on which individual employees were working in the Control Center at that specific time.

Now, with the implementation of this program, LUMA has the necessary strategy and processes in place to operate the system more safely, reliably, and efficiently at all hours of the day regardless of the individuals working in the Control Center. Remediation activities completed in FY2022 include developing the blackstart, outage management and load shedding processes in accordance with the principles set out in the T&D OMA, Act 17 and Act 57. The processes and procedures developed under this program have been filed with PREB under case no NEPR-MI-2021-0001 and are consistent with the System Operation Principles (conditionally approved by the PREB on May 31, 2021). These processes have been developed, tested and adjusted with employees going through formal training. This program reached remediated state earlier than expected, in Q3 of FY2022. Consequently, Operators were able to utilize the procedures during the responses to the April 6 Outage and to storms during the 2022 Atlantic Hurricane Season. While this program has reached remediated state, additional non-SRP improvement activities are still in progress including enhancements to the outage management plan, development of non-SRP related procedures and non-SRP training activities.

The financial information provided within this report has not been subject to audit, and this information is not appropriate for unintended purposes. The limitations and lack of integration of PREPA's financial and related systems and identified pre-existing control gaps may also affect the overall accuracy of reported results.

FY2022 SRP Improvement Programs

LUMA's SRP Improvement Programs² were designed to address the significant and substantial gaps identified and bring the utility's operations and assets up to a minimum industry standard. SRP program spending includes operating expenditures and capital costs within the FY2022 budget and was included in the 2021 Fiscal Plan certified by the Fiscal Oversight and Management Board in June 2021. The summaries below present overall SRP spending for FY2022 and include variance explanations, descriptions of activities and status of milestones for those improvement programs representing at least 5% of spending in that portfolio.

Improvement Portfolio Summary (\$ millions)

Portfolio	FY2022 SRP Estimate ^{1,2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Customer Experience	38.4	12.4	\$ 26.0	68%
Distribution	165.9	27.2	\$ 138.7	84%
Transmission	185.6	5.3	\$ 180.3	97%
Substation	63.8	18.4	\$ 45.4	71%
Control Center & Buildings	17.5	8.4	\$ 9.1	52%
Enabling	128.0	149.7	\$ (21.7)	(17%)
Support Services	21.6	8.6	\$ 13.0	60%
Total	\$ 620.8	\$ 230.0	\$ 390.8	63%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The lack of advancement of federally funded work prior to LUMA commencement impacted the implementation of major programs in the Distribution, Transmission, and Substation portfolios and therefore the federally funded capital investments. Most initial milestones that consisted of starting programs were met. Due to the additional foundational activities required to address the deficiencies and omissions discovered upon commencement, some programs did not advance as much as anticipated, while others have maintained their milestones. Updated SRP programs are provided in the FY2023 SRP Report³. Activities in the Enabling and Support Services portfolios, portfolios with less reliance on federal funding, were generally more in line with overall budget.

² These programs were developed in late 2020, subsequently reviewed and approved by P3 Authority, and then reviewed and approved by the Energy Bureau as part of the Initial Budgets in docket NEPR-MI-2021-0004 and the System Remediation Plan in docket NEPR-MI-2020-0019. Within these programs, specific project initial SOWs for federally funded projects have been submitted for review and approval by the Energy Bureau in docket NEPR-MI-2021-0002. Detailed information on the budget, the System Remediation Plan and the implementation of federally funded capital investments is publicly available on PREB's website for the corresponding dockets.

³ The Proposed Modifications to System Remediation Plan filing was submitted to the PREB under docket NEPR-MI-2020-0019 on April 14, 2022.

Customer Experience Improvement Portfolio Summary (\$ millions)

The Customer Experience Improvement Portfolio focuses on enhancing the customer experience including Distribution Streetlighting, Billing Accuracy and Back Office, and Standardized Metering and Meter Shop Setup.

Program	FY2022 SRP Estimate ^{1, 2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Distribution Streetlighting	25.0	5.5	\$ 19.5	
Billing Accuracy & Back Office	5.0	4.1	\$ 0.9	
Standardized Metering & Meter Shop Setup	5.9	0.7	\$ 5.2	
SRP Programs <5% of Portfolio	2.5	2.1	\$ 0.4	
Total	\$ 38.4	\$ 12.4	\$ 26.0	68%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **Distribution Streetlighting** program upgrades and replaces distribution streetlights. LUMA met both milestones in FY2022 including the start of the streetlight assessments in the first half of the year and starting the streetlight remediation plan and high-risk streetlight replacements in Q4 2022. A specialized team completed high-level assessments in 13 municipalities utilizing a new process and new streetlight application based on a geographic information system platform for data collection and planning. A total of five projects received FEMA approval/obligation during the fiscal year and 12 remained under review by FEMA at the end of the fiscal year. Construction work for these approved projects started in Q4 FY2022. The total SRP spend is lower than planned because there was no advancement of funding by PREPA prior to LUMA's commencement, the process to identify, evaluate, and complete contracts with contractors that meet FEMA requirements took longer than expected and construction started later in the second half of FY2022 than expected.

The **Billing Accuracy and Back Office** program includes updates to print and delivery of bills and other back-office systems to improve the accuracy and timeliness of customer invoices. SRP milestones were achieved and include executing the printing and delivery of invoices through an external supplier. Other key program activities include completing the initial review of CC&B functionality, launching CC&B optimization efforts, centralizing back-office and billing functions in 25+ offices around the island, training more than 100 people and documenting more than 40 procedures and processes, and successfully launching the new LUMA bill. The spend for the SRP work within this program is in line with the SRP planned expenditures.

The **Standardized Metering and Meter Shop Setup** program is targeted at establishing a location for standardized meter testing and the provision of appropriate internal and external meter testing equipment. Milestones were achieved and include establishing the meter shop building & purchasing test equipment for current technology, although, it is important to note that LUMA is still awaiting receipt of purchased testing equipment. Key FY2022 activities include recovering, repairing, and calibrating all meter test equipment, testing 33,401 used meters, and developing the Quality Management System resulting in improved and more accurate metering across all customers. The SRP spend for this program is lower than estimated due to global supply chain challenges in obtaining test equipment.

Distribution Improvement Portfolio Summary (\$ millions)

The Distribution portfolio focuses on improving the low voltage system including Distribution Line Rebuild, Distribution Pole and Conductor Repair, and Distribution Line Assessments.

Program	FY2022 SRP Estimate ^{1, 2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Distribution Line Rebuild	55.5	5.1	\$ 50.4	
Distribution Pole and Conductor Repair	85.1	20.1	\$ 65.0	
Distribution Lines Assessments	25.3	2.0	\$ 23.3	
Total	\$ 165.9	\$ 27.2	\$ 138.7	84%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **Distribution Line Rebuild** program replaces overhead and underground distribution lines by performing distribution line upgrades to improve reliability and resiliency, restoring out of service circuits, completing unfinished circuit construction presently abandoned, performing circuit voltage conversions to improve distribution capacity, building new distribution line extensions to connect new customers, and installing underground cable and/or tree wiring to improve service reliability and resiliency to critical customers. FY2022 SRP milestones were achieved in FY2022 and include starting assessments and reliability planning. Key FY2022 program activities include completing reliability analysis on 177 feeders, planning and analysis on 158 feeders, Quality Assurance stage for reliability analysis on 146 feeders, quality assurance stage for planning analysis on 156 feeders, task order Scope of Work (SOW) on 67 feeders and the receipt of FEMA approvals for four projects (24 feeders). Variance in SRP spend is mainly due to additional engineering activities required and procurement taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

The **Distribution Pole & Conductor Repair** program focuses on minimizing the safety hazard caused by distribution poles and conductors that need to be repaired or replaced. Major repairs and replacement will be based on the results of assessment analyses by engineers. Following this process, safety hazards and priority poles will be replaced, along with damaged conductors and hardware. FY2022 SRP milestones were achieved on target in FY2022 and include starting assessments, reliability planning, and procurement of materials. Key FY2022 program activities include the replacement of approximately 3,000 poles including emergency repairs conducted by operations. The SRP spending variance was mainly due to the formulation of new Work Order packages being delayed by the implementation of a new tool to validate the structural compliance of the designs.

The **Distribution Lines Assessments** program is targeted at the assessment, testing and study of distribution lines, along with required spot repairs and replacements. FY2022 SRP milestones were achieved on target in FY2022 and include starting assessments, reliability planning, and the development of the remediation plan. Key FY2022 program activities include the assessment of 642 distribution feeders representing 57% of the currently identified 1,128 feeder assessments required. The spend for this program is lower than anticipated mainly due to the delay of the Preliminary Engineering Data Collection's request for proposal (RFP), which will be reissued. Offsetting this are the distribution line assessments which are progressing faster than anticipated and assessment results were used to assess, prioritize, and develop capital improvement plans.

Transmission Improvement Portfolio Summary (\$ millions)

The Transmission portfolio focuses on improving system recovery, resilience, and transformation through the IT OT Telecom Systems and Network program, the Transmission Line Rebuild program, and the Transmission Priority Replacements program.

Program	FY2022 SRP Estimate ^{1,2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
IT OT Telecom Systems & Network	134.7	1.6	\$ 133.1	
Transmission Line Rebuild	5.0	1.3	\$ 3.7	
Transmission Priority Pole Replacements	40.0	2.0	\$ 38.0	
SRP Programs <5% of Portfolio	5.9	0.4	\$ 5.5	
Total	\$ 185.6	\$ 5.3	\$ 180.3	97%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **IT OT Telecom Systems & Network** program includes IT and OT telecom investments to improve and revamp the systems used to carry T&D system IT and OT data. FY2022 SRP milestones were achieved on target in FY2022 and include enrolling field mobile devices in the FirstNet first responder system, repairing IP network to enable connection for employees working remotely and in commercial offices, upgrading end of life meter modem assets on 4G to 5G. Key FY2022 program activities include scoping and procurement of technical specifications for major programs (Transport Network, Microwave, Land Mobile Radio), and completing and publishing engineering specifications to be used by major stakeholders and designers for towers, fiber optic, OSP, substation, telecom enclosures, amongst others. Variance mainly due to undisclosed IT/OT issues, requirement of additional network assessments and long procurement/lead times resulting in the planning phase of the program being pushed into FY2023.

The **Transmission Line Rebuild** program focuses on rebuilding, hardening, and upgrading 230 kV, 115 kV, and 38 kV transmission infrastructure. FY2022 SRP milestones were achieved on target in FY2022 and include the start of line assessments and remediation plan. Key FY2022 program activities include the preparation of functional specifications for 42 transmission line rebuild projects, obtaining PREB approval and initiating the FEMA approval process for 38 projects, and submitting detailed SOWs to FEMA for one project. Variance is mainly due to additional engineering activities required and procurement taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

The **Transmission Priority Pole Replacements** program includes activities to replace damaged overhead transmission poles and towers, along with associated hardware and conductors. FY2022 SRP milestones were achieved on target in FY2022 and include the commencement of assessments and remediation work. Key FY2022 program activities include assessments of 284 transmission lines through the High-Level Assessment Program and completing five detailed SOWs which have been submitted to FEMA awaiting approval. Variance is mainly due to data analysis, engineering, and standards reviews required for project scope definition taking longer than anticipated and procurement taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

Substation Improvement Portfolio Summary (\$ millions)

The Substation portfolio aims to improve system resiliency and safety while rebuilding, hardening, and modernizing substations through the Transmission Substation Rebuilds program, the Distribution Substation Rebuild program, the Transmission Substation Security program, and the Compliance and Studies program.

Program	FY2022 SRP Estimate ^{1, 2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Distribution Substation Rebuilds	15.0	0.7	\$ 14.3	
Transmission Substation Rebuilds	20.6	5.1	\$ 15.5	
Transmission Substation Security	15.2	1.2	\$ 14.0	
Compliance and Studies	10.0	11.1	\$ (1.1)	
SRP Programs <5% of Portfolio	3.0	0.3	\$ 2.7	
Total	\$ 63.8	\$ 18.4	\$ 45.4	71%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **Distribution Substation Rebuilds** program focuses on improvements to distribution substations as a means to strengthen the distribution grid. FY2022 SRP milestones were achieved on target in FY2022 and include starting distribution substation assessments and minor distribution substation repairs. Key FY2022 program activities include completing planning analysis, developing functional specifications, conducting field assessments, submitting a total of three projects submitted to FEMA, and receiving FEMA funding obligation for one project. Variance is mainly due to additional engineering activities required and procurement taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

The **Transmission Substation Rebuilds** program covers the required assessment, repair, and rebuilding of damaged substations while making upgrades to meet the latest codes, industry standards, and practices to improve long-term reliability. FY2022 SRP milestones were achieved on target in FY2022 and include the commencement of distribution and substation assessments. Key FY2022 program activities include completing planning analysis, developing functional specifications for 18 substations, conducting field assessments, submitting seven projects to FEMA, and receiving FEMA funding obligations for three projects. Variance is mainly due to additional engineering activities required and procurement taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

The **Transmission Substation Security** program will focus on security at transmission substations. The program will replace and add new security technology and hardware to deter, detect and delay security incidents. The FY2022 system remediation milestone to prioritize sites was achieved on target in FY2022. The FY2022 system remediation milestone to obtain federal funding and begin work has been delayed due to additional work to complete the federal procurement process for FEMA-compliant engineering services. Key FY2022 program activities include the replacement of substation gate padlocks with a key control process, two rounds of preventative vegetation control activities at critical substations and submitting three detailed SOWs and class 3 estimates for a total of 10 substations to FEMA. Variance is mainly due to engineering activities being delayed versus budget as LUMA completes the procurement process for FEMA-compliant engineering services.

The **Compliance & Studies** program consists of T&D System studies focused on eliminating major cascading outages caused by a lack of proper coordination of protective devices; implementing new procedures and standards to ensure the T&D System complies with regulations and Prudent Utility Practice; and completing studies, procedures, and standards for substations and transmission compliance. FY2022 SRP milestones were achieved on target in FY2022 and include starting distribution protection studies and substation grounding remediation activities. Key FY2022 program activities

include the creation, distribution, coordination, and documentation of study guidelines and standards, developing a strategy to identify coordination issues at feeders, developing functional specifications, conceptual single line diagrams, and protection and metering diagrams, developing a fusing strategy to replace and document distribution line fusing to ensure coordination with the mainline breaker. The program accomplished the following: Fusing – 152 site visits with a total of 105 placements, Wide Area Protection – 230kV work orders sent to the field, and 115kV work orders under development, with field implementation to start in FY23. 38kV model validation is underway. Additionally, performed NERC TPL-001-4 standard study to determine major issues with the transmission system and measures to achieve a secure and more reliable system, and NERC CIP-014-2 standard study. Distribution load evaluations were completed for eight projects. Transmission load evaluations were evaluated for 28 projects. Variance is mainly due to additional effort required to advance studies, procedures, and standards in support of federally funded and non-federally funded project work that was assumed to have been completed by PREPA when the FY2022 budget was prepared.

Control Center & Buildings Improvement Portfolio Summary (\$ millions)

The Control Center and Buildings portfolio focuses on building the necessary infrastructure to deliver economic and reliable energy and to meet Applicable Laws and regulations through the Facilities Development and Implementation program, the Critical Energy Management System Upgrades program, and the Control Center Construction and Refurbishment program.

Program	FY2022 SRP Estimate ^{1,2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Facilities Development & Implementation	14.8	3.4	\$ 11.4	
Critical Energy Management System Upgrades	0.7	1.7	\$ (1.0)	
Control Center Construction & Refurbishment	1.0	1.0	\$ -	
SRP Programs <5% of Portfolio	1.0	2.3	\$ (1.3)	
Total	\$ 17.5	\$ 8.4	\$ 9.1	52%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **Facilities Development & Implementation** program is focused on the construction required to remediate facilities and real property. FY2022 SRP milestones were achieved on target in FY2022 and include the inspection and repair of the locked out/tagged out systems which are now fully functional. Key FY2022 program activities include excessive debris removal, set up of functioning working spaces across Puerto Rico, implementation of emergency evacuation action plan, facilities management recruitment and training, receipt of approval from PREB for all facilities federally funded projects, and submission of all 11 detailed SOWs to FEMA for funding obligation. The spending for this program is lower than anticipated mainly due to the reprioritization of funding to account for the backlog of work and skills gaps uncovered at commencement.

The **Critical Energy Management System (EMS) Upgrades** program will replace an obsolete and unsupported EMS and add relevant technology to operate the electric system safely and reliably. The FY2022 SRP milestones that were achieved on target in FY2022 include establishing business and technical requirements and conducting vendor selections. Continued vendor selections and project kickoff milestone was initially projected to be completed in the second half of FY2022 and has been delayed into FY2023 due to additional work to complete the federal procurement process for FEMA-compliant engineering services. Key FY2022 program activities include completing the request for Information and RFP process for the replacement of the EMS including vendor evaluation and selection, obtaining a project number from FEMA, and submitting a detailed SOW to FEMA. The spend for this program is higher than anticipated mainly due to the acceleration of this program.

The **Control Center Construction & Refurbishment** program is targeted at the construction or refurbishment of buildings to house the main and backup control centers and all ancillary support services. The FY2022 SRP milestones to establish business and technical requirements were achieved on target in FY2022. The define and design project milestone was initially projected to be completed in the second half of FY2022 and is in progress with estimated completion delayed into FY2023 due to additional work to complete the federal procurement process for FEMA-compliant engineering services. Key FY2022 program activities include defining the control center building criteria and project requirements on the basis of the design document, identifying the site requirements and location criteria for the primary and secondary control center buildings, initiating contract negotiations following the selection of the Architectural & Engineering vendor, and selecting the primary control center site. The spend for this program has no material variance.

Enabling Improvement Portfolio Summary (\$ millions)

The Enabling portfolio of investment projects focuses on safety and operational excellence through the Vegetation Management program; the T&D Fleet program; the Tools Repair and Management program; and the Health Safety Environment & Quality (HSEQ) and Technical Training program.

Program	FY2022 SRP Estimate ^{1, 2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
Vegetation Management	50.0	50.9	\$ (0.9)	
T&D Fleet	48.4	45.6	\$ 2.8	
HSEQ and Technical Training	9.9	37.2	\$ (27.3)	
Tools Repair & Management	10.9	12.3	\$ (1.4)	
SRP Programs <5% of Portfolio	8.8	3.8	\$ 5.0	
Total	\$ 128.0	\$ 149.7	\$ (21.7)	(17%)

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **Vegetation Management** program includes work to abate or mitigate immediate vegetation risk in critical locations, along with an ongoing program to clear and re-establish right of ways (ROWs) to standard widths. The FY2022 SRP milestones that were achieved on target in FY2022 include establishing a centralized vegetation management team and contracting and purchasing field-enabled IT tools. The implementation of the field-enabled IT tool has been pushed into FY2023 due to procurement taking longer than anticipated because of the complex nature of procurement requirements and processes. Key FY2022 program activities include renegotiating vegetation management contracts resulting in an average 30 percent reduction in rates, maintaining over 900 miles of vegetation, clearing vegetation and debris at all substation locations not included in the physical security program, and completing two rounds of preventative vegetation control activities at each substation site. There was no material variance for this program.

The **T&D Fleet** program includes activities and investments to bring the current vehicle, aircraft, and equipment fleet up to industry standards and is focused on initializing and improving processes for data collection, repair, and maintenance of these assets. FY2022 SRP milestones were achieved on target in FY2022 and include compliance with Puerto Rico's DTOP, Public Service Commission, USDOT and Occupational Safety and Health Administration (OSHA) Standards. Key FY2022 program activities include conducting all required training for fleet employees and completing inspections and certifications of all available fleet assets in accordance with Puerto Rico's Department of Transportation and Public Works (DTOP), United States' Department of Transportation (USDOT) and American National Standards Institute (ANSI) standards. Additionally, LUMA purchased or rented new vehicles, as necessary, to ensure a right-sized, fit-for-purpose fleet, reduced the previously unaccounted for vehicles from over 2,000 to less than 700, placed 16 repair and maintenance facilities into operations and upgraded them to meet industry standards and implemented fleet management software. There was no material variance in the budget to actuals for this program.

The **HSEQ and Technical Training** program provides HSEQ and technical training to field personnel. The FY2022 SRP milestone to identify those employees who needed specific priority training and to begin training was achieved on target in FY2022. The milestone to register and launch the pre-apprenticeship program and the apprenticeship program and conduct initial onboarding training was initially targeted to be completed in FY2023 and has been achieved early in FY2022. Key FY2022 program activities include developing and rolling-out of an accredited apprenticeship and upskilling program; holding over 160 safety courses including, but not limited to, First Aid/Cardiopulmonary Resuscitation incident investigations, confined space entry and electrical safety; and completing over 140,000 hours of in-class and on-the-job training for newly onboarded employees. The spend for this program is higher than estimated mainly due to the need for significantly more technical training and mentorship for employees.

The **Tools Repair & Management** program focuses on a Personal Protective Equipment (PPE) and tooling plan to address safety needs along with putting in place a better system for managing PPE and tools including a centralized Tool and Equipment Crib system. FY2022 SRP milestones were achieved on target in FY2022 and include starting tool and PPE inventory, purchasing all high-priority tools, replacing unusable tools, and implementing training program. Key FY2022 program activities include inventorying 85% of the tools that comprise LUMA's tool crib, purchasing required PPE to support field staffing levels (including high-priority PPE and necessary equipment for employees to work safely and supporting training programs), addressing critical tool inventory gaps through purchases, initiating procurement process for standalone tool crib service contract, introducing monthly testing cycles (by region) to anticipate/identify critical gaps in inventory, and completing supplier set up and commission of the Caguas Testing Lab. Spending for this program is higher than anticipated mainly due to an increase in tool purchases necessary to compensate for noted shortages at the commencement of operations.

Support Services Improvement Portfolio Summary (\$ millions)

The Support Services portfolio supports the overall successful operation of the utility through various programs including the HR Program and the IT OT Asset Management program.

Program	FY2022 SRP Estimate ^{1,2}	FY2022 SRP Actuals ¹	Variance \$ ¹	Variance %
HR Programs	0.5	0.6	\$ (0.1)	
IT OT Asset Management	4.0	0.7	\$ 3.3	
SRP Programs <5% of Portfolio	17.1	7.3	\$ 9.8	
Total	\$ 21.6	\$ 8.6	\$ 13.0	60%

¹ Figures may not add due to rounding.

² FY2022 Planned Expenditures based on June 23, 2021 approved SRP.

The **HR Programs** program includes human resources activities to implement an employee benefit program, an employee engagement strategy, core compliance training and human capital management software. FY2022 SRP milestones were achieved on target in FY2022 and include providing core compliance training to all employees and achieving remediated state. Key program activities accomplished in FY2022 include providing companywide training including compliance, performance, leadership, and job-specific training activities, completing the roll-out of employee benefits including the Health and Wellness program and Competitive 401k Plan, and implementing Human Capital Management Software to streamline HR processes across LUMA to manage employee information. The spend for this program is higher than anticipated mainly due to increased training requirements.

Through the **IT OT Asset Management program**, LUMA has introduced industry standard IT OT asset management procedures and continues to provide the necessary system upgrades to ensure secure business operation and continuity, as well as improved customer responsiveness. The scope of the program includes assessing the application and infrastructure portfolio and beginning a series of software and infrastructure upgrades that drive toward a transition to

cloud-based technology. IT OT resilience in this program also extends to the establishment of a new backup data center to ensure the reliability and resilience of technology systems. FY2022 SRP milestones were achieved on target in FY2022 and include establishing a roadmap and strategy for disaster recovery and business continuity of critical assets and enrolling field mobile devices in the FirstNet first responder system. Key program activities accomplished in FY2022 include implementing multiple technology projects in support of our LUMA teams, completing the OMS stabilization process to improve LUMA's ability to respond to and report on outages, and developing and deploying map migration process from G/Technology software to OMS. Variance is mainly attributed to a slow start of the projects that compose the program and complex processes to get FEMA approval. In some cases, procurement is taking longer than anticipated because of the complex nature of federal procurement requirements and processes.

The financial information provided within this report has not been subject to audit, and this information is not appropriate for unintended purposes. The limitations and lack of integration of PREPA's financial and related systems and identified pre-existing control gaps may also affect the overall accuracy of reported results.



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