

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

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**IN RE:**

THE PERFORMANCE OF THE PUERTO  
RICO ELECTRIC POWER  
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Submission of Performance Metrics Report for January through March 2023, and in compliance with orders of January 12, 2023, and April 3, 2023.**

**SUBMISSION OF PERFORMANCE METRICS REPORT FOR JANUARY THROUGH MARCH 2023 AND  
IN COMPLIANCE WITH ORDERS OF JANUARY 12, 2023, AND APRIL 3, 2023**

**TO THE PUERTO RICO ENERGY BUREAU:**

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

**I. Introduction**

The requirement to submit quarterly reports on specified system data of the Puerto Rico Electric Power Authority (“PREPA”) arises under a Resolution and Order issued by the Puerto Rico Energy Bureau (“Energy Bureau”) on May 14, 2019, in this proceeding. Pursuant to a Resolution and Order issued on December 30, 2020, the quarterly system data is due on the 20<sup>th</sup> day of the month after each quarter closes. Pursuant to Section 5.6 of the Puerto Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”), LUMA as an agent of PREPA, submits systems data regarding the Transmission and Distribution System (“T&D System”) and as instructed by the Energy Bureau, submits PREPA’s system data regarding generation.

In a Resolution and Order of August 18, 2022, this Energy Bureau granted LUMA's request to align the quarterly filings of system data in this proceeding with the filing of the quarterly operation report submitted after each quarter of the fiscal year closes. Consequently, the quarterly reports are now due in the following months: October (with data for the months of July through September), January (with data for the months of October through December), April (with data for the months of January through March), and July (with data for the months of April through June). *See Request for Modification of Schedule to File System Data and Submission of Quarterly Performance Metrics Report for June 2022* ("Request to Modify Schedule") and Exhibit 1 (Schedule of proposed changes) and Exhibit 2 (Proposed Filing Schedule).

LUMA hereby respectfully submits its Report on System Data covering data from the months of January through March 2023. LUMA also hereby submits information in further compliance with the "Resolution and Order regarding underlying data for metrics filed by LUMA and PREPA" issued on January 12, 2023 ("January 12<sup>th</sup> Order"), whereby this Energy Bureau included directives, requested information, and updated explanations on corrective actions, that LUMA would be expected to perform and inform on by the time it submits its quarterly report due in April 2023. *See* January 12<sup>th</sup> Order, pages 3 through 7. Particularly, LUMA submits requested explanations on the LUMA Employee Headcount by Employee Type metric, *see id* Section A(11), as well as data for these metrics for the months of June 2021 through June 2022, *see id* Section B(2). In this filing, LUMA also incorporated the methodology suggested by this Energy Bureau in the January 20<sup>th</sup> Order for the "Percent of Customer Calls Answered" metric (dividing the number of calls answered for the year by the number of calls received for the year). *See id* Section A(12).

Additionally, LUMA complies with the requirements of a Resolution and Order entitled *Updated Data Template for Quarterly Reporting*, issued on April 3, 2023, whereby this Energy Bureau adopted revisions and changes to the quarterly report data template (“April 3<sup>rd</sup> Order”). As will be explained, LUMA has corrected the names of several metrics. For the July 2023 filing of the quarterly performance metrics report, LUMA requests leave from the Energy Bureau to report reliability metrics using LUMA’s districts and not the T&D System’s previous operator’s districts. Finally, LUMA is filing restated values of the Average Speed of Answer metric for the months of October, November, and December 2022.

## **II. Background**

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

On June 22, 2021, LUMA submitted the quarterly performance metrics for the months of March, April, and May 2021, with performance data prior to Interim Service Commencement which occurred on June 1, 2021. LUMA supplemented said filing on July 6, 2021, in a motion entitled *Motion Supplementing Quarterly Performance Metrics Report and Requesting Leave to Defer Reporting of Specified Metrics* (“July 6<sup>th</sup> Supplemental Submission”). Since then, LUMA has complied with the submission of quarterly reports on system data and updates requested by

this Energy Bureau. *See filings* of August 6, 2021; August 13, 2021; September 20, 2021; December 22, 2021; March 21, 2022; June 20, 2022; October 20, 2022; and January 20, 2023.

On August 18, 2022, this Energy Bureau issued a Resolution and Order that included Attachments A and B with a summary and analysis by this Energy Bureau of the system data that LUMA and PREPA reported from June 1, 2021, through May 31, 2022, (“August 18<sup>th</sup> Order”). On page 6 of the August 18<sup>th</sup> Order, this Energy Bureau took notice of LUMA’s prior requests to exclude from the quarterly system data reports, system data on the monthly peak by customer class and monthly peak by district performance metrics (jointly, “monthly peak metrics”). This Energy Bureau indicated that LUMA should continue to report on the monthly peak metrics but accepted that the data is not currently available. *See* August 18<sup>th</sup> Order on page 6. Per the August 18<sup>th</sup> Order, LUMA shall work with this Energy Bureau to develop a process to collect system data and file reports on monthly peak metrics. *See id.* To that end, the Energy Bureau directed LUMA to designate a LUMA representative by August 31, 2022, who shall meet with the Energy Bureau’s staff or consultants to discuss processes to collect data and file reports with system data on customer monthly peak metrics. On August 30, 2022, LUMA submitted the name of its representative.

Furthermore, in the August 18<sup>th</sup> Order this Energy Bureau denied LUMA’s request to report data on performance metrics on total workforce and total open positions, instead of total budgeted headcounts by employee type and total actual head counts by employee type. It directed LUMA to continue to submit data on the latter metrics. This Energy Bureau also granted LUMA’s request to defer reporting on RPS-related metrics.

On page 7 of the August 18<sup>th</sup> Order, this Energy Bureau stated succinctly that for certain performance metrics, LUMA's and PREPA's performance had not improved when compared to the baseline that this Energy Bureau previously set. This Energy Bureau then directed LUMA and PREPA to file by September 1, 2022, "a motion explaining, to the extent possible, the causes of th[e] non-positive negative performance and the corrective measures that [LUMA and PREPA] will implement . . . .".

Subsequently, on August 24, 2022, this Energy Bureau issued a Resolution and Order where it determined that from June 2021 through May 2022, "the performance of LUMA remained within the expected baseline target for approximately eighty four percent (84%) of the metrics evaluated . . . .". *See* August 24<sup>th</sup> Order at page 2. In the August 24<sup>th</sup> Order, this Energy Bureau determined to extend its analysis on performance to PREPA's performance since June 2019 for comparison purposes on reliability ("August 24<sup>th</sup> Order"). Thus, this Energy Bureau directed that on or before September 1, 2022, PREPA should submit an analysis of its non-positive performance from June 19, 2019, through May 31, 2021. *See* August 24<sup>th</sup> Order at pages 1-2.

On September 28, 2022, and in compliance with the August 18<sup>th</sup> Order, LUMA informed that beginning in its quarterly report to be filed on October 20, 2022, it would be reporting on the non-technical losses performance metric ("September 28<sup>th</sup> Submission").

On October 7, 2022, the Energy Bureau entered a Resolution and Order directing LUMA to file on or before October 17, 2022, "the underlying data and supporting calculations with all formulae intact for the SAIDI and SAIFI performance metrics for the first and last month of each quarter the period starting June 1, 2021, through May 31, 2022, for the purposes of auditing

LUMA's and PREPA's reported metrics." (the "October 7<sup>th</sup> Order"). The Energy Bureau further ordered PREPA to "provide such information for its generation fleet to LUMA on or before October 12, 2022, in order for LUMA to include in the October 17, 2022, filing deadline."<sup>1</sup> On October 14, 2022, LUMA requested an extension until November 7, 2022, to comply with the October 7<sup>th</sup> Order.<sup>2</sup>

On October 14, 2022, in compliance with the August 18<sup>th</sup> Order, LUMA submitted explanations on performance data from June through May 2021 and proposed corrective actions for several performance metrics. Further, LUMA requested that this Energy Bureau correct or clarify several portions of Appendix A and Attachment A of the August 18<sup>th</sup> Order, particularly, its analyses and determinations on the data submitted by LUMA on several performance metrics. Finally, LUMA requested that this Energy Bureau reconsider or correct several portions of Attachments A and B of the August 18<sup>th</sup> Order, particularly, its analyses and determinations on the data submitted by LUMA on several performance metrics that involve areas that are not within LUMA's purview or control and thus, the performance data cannot be attributable to LUMA's performance.

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<sup>1</sup> On October 12, 2022, PREPA filed a Motion to Inform Regarding the October 7[, ] 2022 Order whereby it informed the Energy Bureau that the SAIFI and SAIDI metrics are not recorded by PREPA but by LUMA as the administrator of the T&D System and dispatch center. As such, PREPA reported needing to have SAIDI and SAIFI information responsive to the October 7<sup>th</sup> Order.

<sup>2</sup> In a Resolution and Order of October 19, 2022, this Energy Bureau granted LUMA's request for an extension of time to comply with the October 7<sup>th</sup> Order and also directed that by November 7, 2022, LUMA and PREPA shall file the underlying data, definitions and supporting calculations (with formulae intact) for the first and last month of each quarter starting June 1, 2021, through May 31, 2022, for certain performance metrics, to wit: Estimated v. read bills (LUMA); Available vehicles (LUMA and PREPA); and Total workforce: Definition and/or Exclusion (LUMA and PREPA).

On January 20, 2023, LUMA submitted before this Energy Bureau a Motion entitled *Submission of Performance Metrics Report for October through December 2022 and September 2022 Reliability Metrics and in Partial Compliance with order of January 12, 2023* (“January 20th Submission”). In said submission, LUMA complied with that portion of the January 12th Order that authorized LUMA to defer the submission of quarterly System Data on the reliability metrics (“Customer Average Interruption Data Index” (“CAIDI”), “System Average Interruption Index” (“SAIDI”) (Distribution, Transmission Substation, and T&D) and “System Average Interruption Frequency Index” (“SAIFI”) (Distribution, Transmission Substation, and T&D) for September 2022, because of the occurrence of Hurricane Fiona on September 18, 2022, and the response to restore service. LUMA also complied with that portion of the January 12th Order on page 6, which directed LUMA to correct what the Energy Bureau considered an error in cells AP26 and AQ26, Generation Tab, of the spreadsheet entitled “10.20.2022 Resumen Métricas”. In compliance with said portion of the January 12th Order, LUMA clarified in the January 20th Submission, that the data reported in the Generation Tab was the data PREPA provided.

In addition, LUMA complied with the order to report monthly values for July 2022 through September 2022 and to continue to report the 12-month rolling average values in addition to the monthly values on OSHA DART Rate; OSHA Severity Rate; OSHA Fatality Rate; and OSHA Recordable Rate. Furthermore, LUMA complied with the order regarding the Average Speed to Answer and Wait Time metrics in Customer Service Centers. LUMA reported these metrics as rational numbers instead of using a time format. Lastly, LUMA submitted, as Exhibit 1, an update on the LUMA-Pattern team working to resolve the 20 MW of pending additional capacity at

Pattern Santa Isabel and how the procurement proceeding has impacted this metric, as requested in the January 12th Order.

On March 3, 2023, LUMA submitted a Motion entitled *Submission of Corrected Spreadsheets Submitted on Performance Metrics Quarterly Report for October through December 2022, and Corrected Data on Reliability Metrics for July through August 2022*, whereby LUMA submitted revisions to four of the spreadsheets that had been filed in support of the January 20<sup>th</sup> Submission (particularly, the following spreadsheets: “Resumen Métricas Master\_Jan2023.xlsx”, “FY23 Performance Metrics by Area-Transmission & Distribution.xlsx”, “FY23 Performance Metrics by Area- Customer Service.xlsx” and “FY23 Performance Metrics by Area- Renewable and DSM-Active.xlsx.”). Furthermore, LUMA re-submitted the “Resumen Metricas Master\_Jan2023.xlsx” and “FY23 Performance Metrics by Area-Transmission & Distribution.xlsx” spreadsheets to correct values on the district level for SAIDI Transmission Substation, SAIFI Distribution, and SAIFI Transmission Substation, for the months of September 2022, November 2022, and December 2022 and restated the SAIDI and SAIFI values for July 2022 and August 2022, specifically, the TMed value for those months.

On April 3, 2023, this Energy Bureau issued a Resolution and Order titled *Updated Data Template for Quarterly Reporting* (“April 3<sup>rd</sup> Order”). In the April 3<sup>rd</sup> Order, this Energy Bureau re-issued the data template LUMA shall use to submit system data in the quarterly reports. This Energy Bureau adopted formatting changes stated on page 2 of the April 13<sup>th</sup> Order (item 1) and directed that LUMA report separately on the following values: SAIDI (T&D) 12-month rolling average; SAIFI (T&D) 12-month rolling average; Monthly SAIDI (T&D); Monthly SAIFI (T&D);



Percent of customer calls answered; Number of curtailed hours from RPS -eligible capacity- Total; Total installed BESS capacity; Incremental installed BESS capacity; Total of BESS installations; and Incremental number of BESS installations. *Id.* (item 2).

Furthermore, in the April 3<sup>rd</sup> Order, this Energy Bureau renamed several metrics: CAIDI to Monthly CAIDI; SAIDI Distribution to Monthly SAIDI Distribution; SAIDI Transmission Substation to Monthly SAIDI Transmission Substation; SAIFI Distribution to Monthly SAIFI Distribution; SAIFI Transmission Substation to Monthly SAIFI Transmission Substation; Average price to Average fuel price; Average price vs. forecast price to Average fuel price vs. forecast price; Total budgeted head counts by employee type to Budgeted headcounts by employee type; Total actual head counts by employee type to Actual headcounts by employee type; Operational expenses vs. budget(excluding fuel) (by directorate) to Operational expenses vs. budget; Number of customers enrolled in extended payment plans to Number of customers enrolled in extended payment plans by class; Number of customers defaulting on extended payment plans to Number of customers defaulting on extended payment plans by class; and Number of customers completing extended payment plans by class to Number of customers completing extended payment plans by class. *Id.* (item 3).

Furthermore, this Energy Bureau renamed several metrics and assigned new subgroup names: DSO (Days Sales Outstanding) - Total customers to DSO (Days Sales Outstanding) (subgroup: Total customers); DSO (Days Sales Outstanding) - government customers to DSO (Days Sales Outstanding) (subgroup: Government customers); DSO (Days Sales Outstanding) - general customers to DSO (Days Sales Outstanding) (subgroup: General customers); Inventory

turns (annualized percent of value) to Inventory turns (annualized percent of value); (subgroup: Total); Warehouse General Depot (Distribution Center) to Inventory turns (annualized percent of value) (subgroup: Warehouse General Depot (Distribution Center)); Warehouse T & D (Region & District) to Inventory turns (annualized percent of value) (subgroup: Warehouse T & D (Region & District)); Warehouse Plants to Inventory turns (annualized percent of value) (subgroup: Warehouse Plants Capital); expenses vs. budget (system) to Capital expenses vs. budget (subgroup: System); Capital expenses vs. budget - Transmission & Distribution to Capital expenses vs. budget (subgroup: Transmission & Distribution); Capital expenses vs. budget - Generation to Capital expenses vs. budget (subgroup: Generation); Capital expenses vs. budget- Customer Service to Capital expenses vs. budget (subgroup: Customer Service); Capital expenses vs. budget- Administrative & General (Exec) to Capital expenses vs. budget (subgroup: Administrative & General (Exec));Capital expenses vs. budget- Planning and Environmental Protection to Capital expenses vs. budget (subgroup: Planning and Environmental Protection). *Id.* (item 4).

In the April 3<sup>rd</sup> Order, this Energy Bureau also directed that the metrics on “Purchased energy from thermal PPOA's” and “Generation from RPS-eligible PPOA's (by unit)” shall be reported in GWh and that LUMA shall “clarify whether the data it has reported through December 2022 for the above-specified metrics were reported in GWh or MWh, and to ensure that the April 20 submission provides historical and new data in GWh.” *Id.* (item 5). Finally, this Energy Bureau directed that LUMA provide data on the additional metrics, including call abandonment rate,

distribution line inspections, transmission line inspections, T&D substation inspections, and overtime. *Id.*, page 4 (Section III).

On April 6, 2023, LUMA submitted a Motion entitled *Submission of information and explanations requested in order of January 12, 2023*, through which LUMA filed responses to several of the directives issued by the Energy Bureau on its January 12<sup>th</sup> Order labeled A1-A8 and B5<sup>3</sup>, regarding the following performance categories: (1) Percent of Bills Estimated vs. Read, *see id.*, page 3; (2) Cash recovered on theft, *see id.*; (3) Percent of customers on AMI, *see id.*; (4) Timely submission of Monthly Reports, *see id.*; (5) Total available vehicles in service, *see id.*, page 4; (6) System Average Interruption Duration Index, *see id.*; (7) System Average Interruption Frequency Index, *see id.*; (8) Customer Average Interruption Duration Index, *see id.*, page 5; and (9) Reliability Data, *see id.*, page 7.

### **III. Compliance with the April 3<sup>rd</sup> Order**

Today, LUMA is submitting an Excel spreadsheet entitled “Resumen Metricas Master\_April2023.xlsx,” which includes System Data for the months of January through March 2023. Said submission includes the following changes in compliance with the requirements of the April 3<sup>rd</sup> Order that were outlined in Section II of this Motion:

1. Formatting changes – LUMA used the new data template that this Energy Bureau issued alongside the April 3<sup>rd</sup> Order;
2. LUMA added the new required values on ten (10) new metrics in alignment with item 2 on “new additions” of the April 3<sup>rd</sup> Order and, thus, is reporting those

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<sup>3</sup> The requirements are found in Section II A 1 through A8 and Section III B5 of the January 12<sup>th</sup> Order.

values, on the ten (10) new metrics outlined, on page 2, item 2, of the April 3<sup>rd</sup> Order;

3. LUMA renamed, as ordered, the thirteen (13) metrics that are identified on page 2, item 3 of the April 3<sup>rd</sup> Order; and
4. LUMA renamed the sub-groups of the thirteen (13) metrics identified on page 2, item 4 of the April 3<sup>rd</sup> Order.

LUMA confirms that the data through December 2022 on the “Purchased energy from thermal PPOA's” metric and the “Generation from RPS-eligible PPOA’s (by unit)” metric, was reported in MWh. Furthermore, LUMA is submitting both the historical and new data for those metrics in GWh.

Finally, LUMA has included in this quarterly report data on the additional metrics identified, to wit, call abandonment rate, distribution line inspections, transmission line inspections, T&D substation inspections, and overtime. The historical data has been included in this filing. LUMA values are reported from June 2021 through March 2023.

#### **IV. Request for Adoption of LUMA’s Districts in connection with reliability metrics**

The system average interruption duration index (“SAIDI”) and system average interruption frequency index (“SAIFI”) are provided at the system level and by PREPA’s operational districts. LUMA, in its continuing effort to become more efficient and to provide the best service to our customers, requests for the July 20, 2023, quarterly report to align the SAIDI and SAIFI metrics to LUMA’s operational districts instead of continuing to report these on PREPA’s districts.

LUMA's districts are included in information systems databases that no longer recognize PREPA's district structure. This, in turn, makes it difficult for LUMA to report on PREPA's districts. LUMA districts are Mayagüez, Aguadilla, Utuado, Arecibo, Vega Baja, Barranquitas, Caguas, Humacao, Guayama, Ponce, Yauco, Bayamón, San Juan, Canóvanas and Fajardo.

The historical data on these districts will be provided to the Energy Bureau so that comparisons of the information on reliability metrics over time can be made. We recognize that the change in districts is a dynamic one for the company depending on its needs; in addition, the proposed changes do not affect the metrics of the system, only the districts in which the interruptions are reported. In addition, this change will properly align the districts to LUMA's operations and bring transparency to the data being reported to this Energy Bureau.

#### **V. Revisions and Restatement of Values**

It is respectfully informed that in the quarterly report submitted today, LUMA has corrected the name of the metric "OSHA Fatality Rate" to replace it with the term "OSHA Fatality" because the data presented on that metric does not reflect a rate. The renaming does not change the metric definition or calculation.

LUMA has renamed the metric "Average time to respond to service and outage complaints" to "Average time to respond to service complaints" to better align with the metric as noted on the Quarterly Performance Metrics filing of June 20, 2022.

Finally, LUMA is restating the values of the Average Speed of Answer for the months of October, November, and December 2022. LUMA identified an error in a time format that

translated to inadvertently reporting a wrong value for these months. LUMA has corrected the values in this filing.

**WHEREFORE**, LUMA respectfully requests this Honorable Bureau **take notice of the** aforementioned; **accept** the Quarterly Performance Metrics Report for the months of January through March 2023; **deem** that LUMA complied with those portions of the January 12<sup>th</sup> Order with orders related to the LUMA Employee Headcount (A11), Percent of Customer Calls Answered (A12), total budgeted and actual head counts by employee type (B2) metrics: **deem** that LUMA complied with the April 3<sup>rd</sup> Order; and **grant** LUMA leave to report the reliability metrics in the July 2013 performance metrics quarterly report using LUMA's districts.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20<sup>th</sup> day of April 2023.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to counsel for PREPA, Joannely Marrero-Cruz, [jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law).



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*Exhibit 1*

*Performance Metrics Data for January Through March 2023 and Supporting Files to be submitted via email in Excel format.*