

**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 April through June 2023.

**SUBMISSION OF PERFORMANCE METRICS REPORT FOR APRIL THROUGH JUNE 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 20th day of the month after each quarter closes¹. Pursuant to Section 5.6 of the Puerto Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”), LUMA as an

¹ 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).

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. Genera PR, LLC, current Operator of the Thermal Generation Facilities, pursuant to the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement (“LGA OMA”) executed on January 24, 2023, provided LUMA generation data for PREPA’s Generation Facilities.

LUMA hereby respectfully submits the Quarterly Report on System Data covering data for the months of April through June 2023.

II. Background

On May 21st, 2021, this Energy Bureau issued a Resolution and Order establishing four categories of system data applicable to PREPA, among others (“May 21st Resolution and Order”). *See* May 21st Resolution and Order on pages 3-14. Per the May 21st 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 6th 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; January 20, 2023; and April 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 18th Order”). On page 6 of the August 18th 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 18th Order on page 6.

Furthermore, in the August 18th 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 that LUMA continue to submit data on the latter metrics. This Energy Bureau also granted LUMA’s request to defer reporting on RPS-related metrics.

On September 28, 2022, and in compliance with the August 18th 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 28th 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 7th 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."² On October 14, 2022, LUMA requested an extension until November 7, 2022, to comply with the October 7th Order.³

On October 14, 2022, in compliance with the August 18th 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 18th 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 18th 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.

² 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 7th Order.

³ 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 7th 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 October 20, 2022, LUMA filed the Quarterly Performance Metrics Report for the months of July through September 2022 (“October Quarterly Report”). In the motion submitting the October Quarterly Report, LUMA requested 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 the month of September 2022, because the occurrence of Hurricane Fiona on September 18, 2022, and the response to restore service, affected LUMA’s ability to compile, review and report data on the reliability metrics for the month of September. In a Resolution and Order of January 12, 2023, this Energy Bureau granted said request for deferral (“January 12th Order”).

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”. 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 20th 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 Metrics 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 3rd Order”). In the April 3rd 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 13th 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).

In the April 3rd 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 3rd 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 12th Order labeled A1-A8 and B5⁴, 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.

⁴ The requirements are found in Section II A 1 through A8 and Section III B5 of the January 12th Order.

On April 20, 2023, LUMA submitted a Motion entitled *Submission of Performance Metrics Report for January through March 2023, and in compliance with orders of January 12, 2023, and April 3, 2023* (“April 20th Submission”). The April 20th Submission included an Excel spreadsheet entitled “Resumen Metricas Master_April2023.xlsx,” with System Data for the months of January through March 2023 and the following changes in compliance with the requirements of the April 3rd Order:

1. Formatting changes – LUMA used the new data template that this Energy Bureau issued alongside the April 3rd Order;
2. LUMA added the new required values on ten (10) new metrics in alignment with item 2 on “new additions” of the April 3rd Order and, thus, reported those values, on the ten (10) new metrics outlined, on page 2, item 2, of the April 3rd Order;
3. LUMA renamed, as ordered, the thirteen (13) metrics identified on page 2, item 3 of the April 3rd Order; and
4. LUMA renamed the sub-groups of the thirteen (13) metrics identified on page 2, item 4 of the April 3rd Order.

LUMA also confirmed 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 submitted both the historical and new data for those metrics in GWh. LUMA also included data on additional metrics, to wit, call abandonment rate, distribution line inspections, transmission line inspections, T&D substation inspections, and overtime and included historical data.

In the April 20th Submission, the system average interruption duration index (“SAIDI”) and system average interruption frequency index (“SAIFI”) were provided at the system level and by PREPA’s operational districts. In its continuing effort to become more efficient and to provide the best service to our customers, LUMA requested 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 explained that its 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. Furthermore, LUMA informed that the historical data on the PREPA districts would be provided to the Energy Bureau so that comparisons of the information and reliability metrics under LUMA’s districts and PREPA’s districts can be made. This request is pending consideration by the Energy Bureau.

In the April 20th Submission, LUMA corrected the name of the metric “OSHA Fatality Rate” to replace it with the term “OSHA Fatality” and renamed the metric “Average time to respond to service and outage complaints” to “Average time to respond to service complaints.” Finally, LUMA restated the values of the Average Speed of Answer for the months of October, November, and December 2022 to correct an error in a time format.

III. Submission of System Data for April through June 2023

With this Motion, LUMA is submitting the System Data for the months of April through June 2023. This submission includes an Excel spreadsheet entitled “Resumen Metricas

Master_July2023.xlsx,” that includes System Data in compliance with the reporting and formatting requirements of the August 18th and April 3rd Orders.

As stated in Section II of this Motion, in the April 20th Submission LUMA requested to align the system average interruption duration index (“SAIDI”) and system average interruption frequency index (“SAIFI”) metrics to LUMA’s operational districts, instead of continuing to report these on PREPA’s districts. In this filing LUMA has incorporated LUMA’s districts. The historical data on LUMA’s districts has been included, to allow comparisons of the information on reliability metrics over time.

WHEREFORE, LUMA respectfully requests this Honorable Bureau **take notice of the** aforementioned; **accept** the Quarterly Performance Metrics Report for the months of April through June 2023; **deem** that LUMA complied with the August 18th and April 3rd Orders and **accept** the report on reliability metrics using LUMA’s districts.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of July 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 and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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Exhibit 1
Performance Metrics Data for April Through June 2023 and Supporting Files to be submitted via email in excel format.