

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

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

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

**SUBJECT:** Response to LUMA's Request to  
Align SAIDI and SAIFI Metrics to LUMA's  
Operational Districts.

**RESOLUTION AND ORDER**

**I. Introduction**

On May 14, 2019, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("May 14 Resolution") in which it determined that it would be in the public interest to commence as soon as possible the Puerto Rico Electric Power Authority ("PREPA") data gathering process in order to help the Energy Bureau and the stakeholders in developing measures, metrics and targets and to provide useful information for developing incentive and penalty mechanisms. The May 14 Resolution required PREPA to provide quarterly reports of key performance metrics/indicators, beginning September 15, 2019.<sup>1</sup> Pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("T&D OMA"), LUMA is now responsible for submitting data regarding the Transmission and Distribution System in this docket.<sup>2</sup>

*Jim*  
On April 20, 2023, LUMA filed a document titled *Submission of Performance Metrics Report for January through March 2023 and In Compliance with Orders of January 12, 2023 and April 3, 2023* ("April 20 Motion"). In this submission, LUMA submitted the "Resumen Metricas" file along with supporting data spreadsheets. Within this submission, LUMA included a Request for Adoption of LUMA's districts in connection with reliability metrics.<sup>3</sup>

*JAA*  
Since LUMA became the Operator<sup>4</sup> in June 2021, it has been reporting SAIDI and SAIFI by PREPA's operational districts. Now, LUMA requests to align the SAIDI and SAIFI metrics with its own operational districts. LUMA asserts that this change in reporting is part of its effort to become more efficient and to provide the best service to its customers, and claims that this new reporting scheme will enhance the transparency of the data being reported to the Energy Bureau.<sup>5</sup>

*Jim*  
*CDM*  
On July 20, 2023, LUMA filed a document titled *Submission of Performance Metrics Report for April through June 2023* ("July 20 Motion"). In this filing, LUMA incorporated LUMA's districts for the reporting of SAIDI and SAIFI metrics. LUMA provided historical data through June 2021 to allow comparisons of the information over time.<sup>6</sup>

<sup>1</sup> See Resolution and Order, In Re: The Performance of the Puerto Rico Electric Power Authority, Case No. NEPRMI-2019-0007, May 14, 2019 ("May 14 Resolution").

<sup>2</sup> Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement, between and among, PREPA, the Puerto Rico Public-Private Partnership Authority ("P3 Authority"), LUMA Energy, LLC as ManagementCo, and LUMA Energy Servco, LLC as ServCo (jointly referred as, "LUMA"), dated June 22, 2020 ("T&D OMA").

<sup>3</sup> April 20 Motion, Section IV, pp 12-13.

<sup>4</sup> As defined in the T&D OMA.

<sup>5</sup> April 20 Motion, Section IV, pp 12-13.

<sup>6</sup> July 20 Motion, Section III, pp. 11-12.



## II. First Requirement of Information

The Energy Bureau **DETERMINES** additional information is required for it to evaluate LUMA's request to report the SAIDI and SAIFI metrics according to LUMA's operational districts instead of continuing to report these metrics using PREPA's districts.

## III. Conclusion

The Energy Bureau **ORDERS** LUMA, within fifteen (15) days of the notification of this Resolution and Order, to respond, to the Requirements of Information ("ROI"s) set forth in Attachment A to this Resolution and Order.

Be it notified and published.

  
\_\_\_\_\_  
Edison Avilés Deliz  
Chairman

  
\_\_\_\_\_  
Lillian Mateo Santos  
Associate Commissioner

  
\_\_\_\_\_  
Ferdinand A. Ramos Soegaard  
Associate Commissioner

  
\_\_\_\_\_  
Sylvia B. Ugarte Araujo  
Associate Commissioner

  
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Antonio Torres Miranda  
Associate Commissioner

## CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on August 16, 2023. I also certify that on August 16, 2023, a copy of this Resolution and Order was notified by electronic mail to margarita.mercado@us.dlapiper.com, jmarrero@diazvaz.law, hriviera@jrsp.pr.gov; and I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau.

I sign this in San Juan, Puerto Rico, on August 16, 2023.

  
\_\_\_\_\_  
Sonia Seda Gaztambide  
Clerk





## ATTACHMENT A

To better understand LUMA's request in its April 20 Motion, the Energy Bureau requests the following information from LUMA on the topic of reliability metrics.

1. In their quarterly report filings through that of April 20, 2023, LUMA and PREPA had reported SAIDI and SAIFI across 26 different districts. LUMA has now proposed to report this data for 15 different districts.
  - a. Explain how LUMA chose to define its 15 operational districts.
  - b. Explain and specifically document how LUMA plans to re-group the original 26 districts into its 15 operational districts.
  - c. Provide a map of Puerto Rico that depicts the delineations of the 15 proposed districts.
  - d. For comparison purposes, provide a map of PREPA's original 26 districts.
2. Explain how aligning SAIDI and SAIFI metrics to LUMA's operational districts will help LUMA to become more efficient, provide the best service to its customers, and improve data transparency for the Energy Bureau as LUMA contends in its April 20 Motion.
3. Does LUMA have the data necessary to recalculate the district-level SAIDI and SAIFI under its proposed districts going back to June 2019? If not, then please explain why not. If yes, please provide these retrospective values, for each historical quarterly report back to June 2019.
4. Please provide a retrospective report for FY2023 that compares monthly SAIDI and SAIFI values (Transmission Substation, Distribution and T&D) using PREPA's districting scheme (26 districts), with LUMA's proposed districting scheme (15 districts). Include all workpapers documenting these calculations, with all formulas intact, in Excel format.
5. Refer to "FY23-Performance-Metrics-by-Area-Transmission-Distribution.xlsx" as submitted on April 20 Motion and the July 20 Motion. The Energy Bureau needs to understand how the values on the "SAIDI and SAIFI" tab have been calculated. For the most recent historical quarter (April 2023 through June 2023), show how LUMA calculated the SAIDI and SAIFI monthly values with formulas intact and all underlying raw data for:
  - a. The original 26 districts and overall system
  - b. The proposed 15 districts and overall system

