

**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 Submission of Performance Metrics Report for April through June 2023 and LUMA's Motion in Compliance with Resolution and Order of August 16, 2023.

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 PREPA's 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, 2019.¹ Pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement, LUMA is now responsible for submitting data regarding the Transmission and Distribution System in this docket.

On August 18, 2022, the Energy Bureau issued a Resolution and Order ("August 18 Resolution") in which it presented a summary of LUMA's first twelve months of operation. The Energy Bureau found that for certain performance metrics, LUMA's performance had not improved compared to the baseline that was previously set in this docket. The Energy Bureau ordered LUMA and PREPA to file a motion explaining the causes of their negative performance and the corrective measures they would implement to improve their performance.

On October 15, 2022, LUMA filed a document titled *Submission in Response to Resolution and Order of August 18, 2022* ("October 15 Submission"). In this document, LUMA included explanations of its performance in response and measures to improve performance for a set of metrics.

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 Submission"). 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.

On July 20, 2023, LUMA filed a document titled *Submission of Performance Metrics Report for April through June 2023* ("July 20 Submission"). In this submission, LUMA submitted the "Resumen Metricas" file along with supporting data spreadsheets. This submission includes data for the fourth quarter of Fiscal Year 2023 (FY23). 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.

On August 16, 2023, the Energy Bureau issued a Resolution and Order ("August 16 Resolution") requesting additional data and information regarding LUMA's request to report the reliability metrics according to LUMA's operational districts. The Energy Bureau determined this additional information was necessary to properly evaluate LUMA's request.

¹ 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").



On September 6, 2023, LUMA filed a document titled *Motion in Compliance with Resolution and Order of August 16, 2023 and Request for Confidential Treatment* ("September 6 Motion"). This submission included responses to the requests for information that the Energy Bureau had requested along with two Excel workbooks with supporting data.

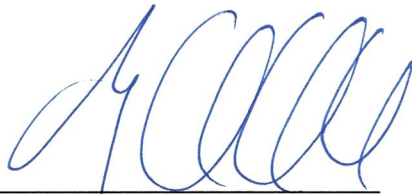
II. Requirement of Information

The Energy Bureau has further reviewed LUMA's July 20 Submission and September 6 Motion. The Energy Bureau **DETERMINES** that additional information is required for it to properly evaluate LUMA's Fiscal Year 2023 performance as provided in the July 20 Submission. The Bureau further **DETERMINES** that additional clarification is required to understand the data that was provided in the September 6 Motion.

III. Conclusion

The Energy Bureau **ORDERS** LUMA to respond, on or before October 31, 2023, to the Requirements of Information ("ROI"s) set forth in Attachment A to this Resolution and Order.

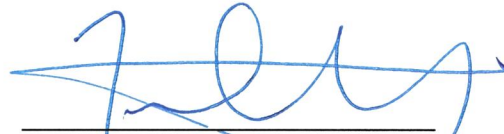
Be it notified and published.



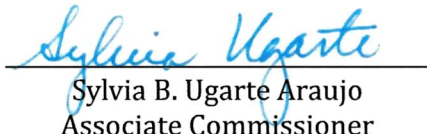
Edison Avilés Deliz
Chairman



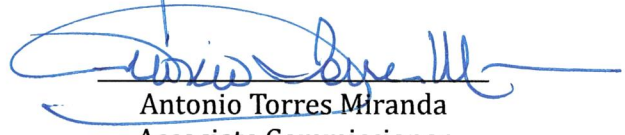
Lillian Mateo Santos
Associate Commissioner



Ferdinand A. Ramos Soegaard
Associate Commissioner



Sylvia B. Ugarte Araujo
Associate Commissioner



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 October 16 2023. Also certify that on October 16 2023 I have proceeded with the filing of this Resolution and was notified by email to: margarita.mercado@us.dlapiper.com, Yahaira.delarosa@us.dlapiper.com; jmarrero@diazvaz.law, hriviera@jrsp.pr.gov.

I sign this in San Juan, Puerto Rico, today, October 16, 2023.


Sonia Seda Gaztambide
Clerk

ATTACHMENT A

To better understand LUMA's data as provided in its July 20 and September 6 Motions, the Energy Bureau requires the following information from LUMA on the topic of performance metrics.

1. Explain why the monthly average system SAIDI has increased during LUMA's tenure as System Operator (June 2021 through present) relative to PREPA's historical performance (June 2019 through May 2021).
2. Provide an update on the following programs that LUMA stated were in progress to improve reliability performance during FY 2023, as written in LUMA's October 15 Submission²:
 - a. Improved asset monitoring, including thermography via drones to identify failing equipment
 - b. Increased focus, such as how LUMA is shifting how crews carry out work so that crews can devote more time to service restoration
 - c. Onboard and deploy experienced workers for reliability work and Outage Response
 - d. Onboard local line contractors
 - e. Onboard and deploy contractors for reconstruction work
 - f. Conduct accelerated vegetation management of top critical lines.
 - g. Onboard and deploy contractor workers
 - h. Install new state-of-the-art automation devices
3. Provide an update on the condition of critical equipment that LUMA identified as being in poor condition and requiring replacement. For example, in LUMA's October 15 Submission, it stated that "nearly 25 percent of the 1200 substation breakers were out of service when LUMA began operations, over a third of which have now been repaired or replaced."³
4. Provide an update on the following programs to improve SAIFI that LUMA indicated were in progress in its October 15 Submission⁴:
 - a. Transmission and distribution pole & conductor repair
 - b. Transmission and distribution line rebuild
 - c. Transmission and distribution substation reliability improvements
 - d. Distribution automation
 - e. LUMA vegetation strategic approach
 - f. Enhanced asset monitoring
5. For the metrics that LUMA has been reporting related to distributed generation such as "Total installed distributed generation capacity – Photovoltaic", "Incremental installed distributed generation capacity per month – Photovoltaic", "Total number of distributed generation installations – Photovoltaic", and "Incremental number of distributed generation installations per month – Photovoltaic":
 - a. Please clarify whether LUMA has been reporting invoiced or registered capacity.
 - b. If LUMA is reporting registered capacity instead of invoiced capacity, explain why.
 - c. For the following metrics, please provide an Excel workbook with monthly **invoiced** DG capacity from June 2019 (or as much as is available) through present day if this differs from what LUMA has been providing already in the quarterly report:

² LUMA Responses to August 18, 2022 Resolution and Order. Response RFI-LUMA-MI-2021-0007-220818-PREB-6 and PREB-8

³ LUMA Responses to August 18, 2022 Resolution and Order. Response RFI-LUMA-MI-2021-0007-220818-PREB-6

⁴ LUMA Responses to August 18, 2022 Resolution and Order. Response RFI-LUMA-MI-2021-0007-220818-PREB-8



- i. "Total installed distributed generation capacity – Photovoltaic"
 - ii. "Incremental installed distributed generation capacity per month – Photovoltaic"
 - iii. "Total number of distributed generation installations – Photovoltaic"
 - iv. "Incremental number of distributed generation installations per month – Photovoltaic"
6. For the following metrics, provide an update on when LUMA expects it will have the ability to start reporting the following metrics and explain why LUMA has not been able to provide data for these metrics up to this point:
 - a. Monthly peak by customer class
 - b. Monthly peak by district
 - c. Momentary Average Interruption Frequency Index (MAIFI)
 - d. Mean time to interconnect utility-scale RPS-eligible projects
7. Regarding the Overtime metric that LUMA is reporting:
 - a. Explain how this metric is currently being calculated.
 - b. Provide LUMA's workpapers used to calculate this metric.
 - c. LUMA reported a value of -1104% for December 2022.⁵ Explain what occurred this month to result in this value.
8. LUMA has reported an average delay in anticipated online date of RPS-eligible projects of 0 days for each month since June 2021.
 - a. Please explain how LUMA has been calculating this and provide all relevant workpapers.
9. Explain why cash recovered on theft has decreased in FY22 and FY23 relative to FY20 and FY21.
10. Does LUMA have a plan to increase the percent of customer calls answered and decrease call abandonment rate? If so, please provide a summary of the plan.
11. Does LUMA have a plan to increase the percent of customers billed and decrease the percent of bills estimated vs read? If so, please provide a summary of the plan.
12. Provide an explanation regarding why it took LUMA an average of 5 days to respond to service and outage complaints in FY23.
13. Refer to "20230906 MI20190007 PUBLIC ROI Response LUMA-PREPA FY23.xlsx"⁶
 - a. Explain and justify the adjustments that LUMA made to the reliability data, as described in cell C9 of tab "Table of Contents".
 - b. Explain why the system-level SAIDI data provided on the "SAIDI_Overall System" tab has small differences from the Monthly SAIDI data provided in the July 20th Submission for certain months, such as March 2023 and June 2023, and state which source is correct.



⁵ See "Resumen-Metricas-Master_July2023.xlsx" as filed by LUMA in its July 20 Submission In Re: The Performance of the Puerto Rico Electric Power Authority, Case No. NEPRMI-2019-0007, July 20, 2023.

⁶ See LUMA's September 6 Motion, In Re: The Performance of the Puerto Rico Electric Power Authority, Case No. NEPRMI-2019-0007, September 6, 2023.