

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

<b>NEPR</b>
<b>Received:</b>
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<b>8:33 PM</b>

**IN RE:**

THE PERFORMANCE OF THE PUERTO  
RICO ELECTRIC POWER  
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Submission of Restated Values for  
Reliability Metrics**

**MOTION SUBMITTING RESTATED VALUES FOR THE SAIDI AND SAIFI RELIABILITY  
PERFORMANCE METRICS, FISCAL YEAR 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:

1. On October 20, 2022, LUMA filed before this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) its Report on System Data, covering performance data from July through September 2022. *See Submission of Performance Metrics Report for July through September 2022* (“October 20<sup>th</sup>, 2022 Motion”).

2. On January 20, 2023, LUMA filed its Report on System Data, covering performance data from October through December 2022 and data for the reliability metrics for September 2022. *See Submission of Performance Metrics Report for October through December 2022 and In Partial Compliance with Order of January 12, 2023*. (“January 20<sup>th</sup> Motion”).

3. On April 20, 2023, LUMA submitted its Report on System Data, covering data from January through March 2023. *See filed 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<sup>th</sup> Motion”). In said submission, LUMA requested leave from the Energy Bureau to report reliability metrics (SAIDI and SAIFI metrics) using LUMA’s districts, as opposed to the Puerto Rico Electric Power Authority’s (“PREPA”) districts.

4. Then, on July 20, 2023, LUMA submitted its Report on System Data covering April through June 2023. *See Submission of Performance Metrics Report for April through June 2023* (“July 20<sup>th</sup> Motion”). As announced in the April 20<sup>th</sup> Motion, in its submission of data pertaining to the reliability metrics, LUMA incorporated LUMA’s districts instead of PREPA’s districts. LUMA incorporated the historical data on LUMA’s districts to compare the information on reliability metrics over time.

5. On August 16, 2023, the Energy Bureau issued a Resolution and Order (“August 16<sup>th</sup> Order”) whereby it determined that additional information was required to evaluate LUMA’s July 20<sup>th</sup> Motion and the request to report the SAIDI and SAIFI metrics according to LUMA’s operation districts, rather than PREPA’s districts. This Energy Bureau ordered LUMA to respond to various requests for information included as Attachment A of the August 16<sup>th</sup> Order.

6. On September 6, 2023, LUMA filed the *Motion in Compliance with Resolution and Order of August 16, 2023, and Request for Confidential Treatment*, including responses to the requirements of information of the August 16<sup>th</sup> Order (“September 16<sup>th</sup> Motion”). In its response to Requirement of Information Number 5 on how LUMA calculated the SAIDI and SAIFI values that were submitted with the April 20<sup>th</sup> and July 20<sup>th</sup> motions, LUMA submitted an excel workbook, “ROI Response LUMA-PREPA FY23” and explained that the SAIDI and SAIFI monthly values were calculated using the formulas presented in said excel spreadsheet. LUMA

also explained that it adjusted the raw data to reflect an accurate count of events and impacts on the T&D system. LUMA informed that the monthly system and district SAIDI and SAIFI previously reported may show small variations because of those adjustments.

7. On October 16, 2023, this Energy Bureau issued additional requirements of information regarding the July 20<sup>th</sup> Motion and granted LUMA until October 31, 2023, to comply and file responsive information (“October 16<sup>th</sup> Order”). *See* Attachment A of the October 16<sup>th</sup> Order (requirements of information).

8. Today, LUMA is submitting its responses to the requirements of information issued in the October 16<sup>th</sup> Order. In Response number 13, LUMA explains what adjustments were made to the reliability data filed with the September 6<sup>th</sup> Motion. LUMA also explains that after fiscal year 2023 (FY2023) closed, it made additional adjustments to the reliability data for FY2023 “to accurately reflect the outage classification which impacted the overall system SAIDI by less than 0.3%.” Accordingly, with this Motion, LUMA is submitting a revised excel workbook with system data for FY2023 (“Resumen Metricas Master\_October2023.xlsx”) and a revised excel workbook on “FY24-Q1-Performance-Metrics-by-Area-Transmission-Distribution spreadsheets, which include adjusted values for SAIDI and SAIFI for FY2023. *See Exhibit 1.*

9. In furtherance of its continued efforts to improve its processes in alignment with industry standards, LUMA continually reviews and adjusts reliability data on a normal basis to incorporate in its reports on system data, improved data that reflects the correct number of customers affected, duration of the outages and the cause codes of the outages. The process to review reliability data and perform corrections takes several months and may extend until after the

end of the fiscal year. Thus, after a fiscal year ends, it may be necessary to correct reliability data that was filed in prior quarters with this Energy Bureau.

10. It is respectfully informed that after the end of a fiscal year, as is this case for FY2023, LUMA may restate and re-file, as needed, SAIDI and SAIFI values to reflect any corrections and improve the quality of LUMA's reporting.

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned and **receive and accept** *Exhibit 1* which includes excel workbooks with restated SAIDI and SAIFI values for FY2023.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 31<sup>st</sup> day of October 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 PREPA's General Counsel, Lionel Santa Crispín, [lionel.santa@prepa.pr.gov](mailto:lionel.santa@prepa.pr.gov), PREPA's counsel of record, Joannely Marrero, [jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law) Genera PR LLC, through its counsel of record Jorge Fernández-Reboredo, [jfr@sbglaw.com](mailto:jfr@sbglaw.com) and Alejandro López Rodríguez, [alopez@sbglaw.com](mailto:alopez@sbglaw.com), and the Independent Consumer Protection Office, Hannia Rivera Diaz, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov).



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*Exhibit 1*  
*Excel spreadsheets to be submitted via email*