

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

NEPR
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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 October through December 2023.**

SUBMISSION OF PERFORMANCE METRICS REPORT FOR OCTOBER THROUGH DECEMBER 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. In accordance with 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. In a Resolution and Order dated January 19, 2023 (“January 19th Order”), this Energy Bureau issued a revised data template that incorporates

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).

changes to several generation-side metrics that are currently reported by Genera, and directed that LUMA, PREPA and Genera should use the revised data template to submit the quarterly reports, starting with the quarterly report with data for the months of October through December 2023. Per the January 19th Order, the quarterly report with System Data for October through December 2023, should be filed by January 29, 2024.

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”). 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 to submit to this Energy Bureau.

LUMA hereby respectfully submits the Quarterly Report on System Data covering data for the months of October through December 2023, in the format requested in the January 19th Order.² This submission also complies with the directives issued by this Energy Bureau in a Resolution and Order dated December 21, 2023 whereby, among others, this Energy Bureau approved LUMA’s request to report reliability data using LUMA’s operation districts, as opposed to PREPA’s districts (“December 21st Order”). *See* December 21st Order, on pages 8-9.

² On April 3, 2023, this Energy Bureau issued a Resolution and Order titled *Updated Data Template for Quarterly Reporting*. In the April 3rd Order, this Energy Bureau re-issued the data template LUMA shall use to submit system data in the quarterly reports. The revised template issued with the January 19th Order, supersedes the template issued with the April 3rd Order.

II. Background on Filing of Quarterly System Data Reports

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. 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 (filing updated quarterly report with System Data for March through May 2021, in compliance with order of August 6, 2021); September 20, 2021; December 22, 2021; March 21, 2022; June 20, 2022; July 29, 2022; October 20, 2022; January 20, 2023; April 20, 2023; July 20, 2023; October 20, 2023; and October 31, 2023 (submitting restated values).

III. Submission of System Data for October through December 2023

With this Motion, LUMA is submitting System Data for the months of October through December 2023. This submission includes an Excel spreadsheet entitled “Resumen Métricas Master_Jan2024.xlsx,” with System Data in compliance with the reporting requirements set forth by this Energy Bureau in the January 19th Order.

A. Request to Add the Toa Baja Operational District to LUMA’s Reliability Metrics

As LUMA explained in the motion filed on April 20, 2023, titled *Submission of Performance Metrics Reports for January Through March 2023 and in compliance with the orders of January 12, 2023 and April 3, 2023* (“April 20th Motion”), to measure reliability LUMA’s districts evolve pursuant to LUMA’s operational needs and change accordingly. In addition, as explained in prior filings, including the motion filed on September 6, 2023, titled *Motion in Compliance with Resolution and Order of August 16, 2023, and Request for Confidential*

Treatment, LUMA continues to assess the operational priorities of the T&D system and customer needs, which may result in adjustments to the district boundaries as required. LUMA proposes to add the Toa Baja District to the reporting matrix on reliability indices. In line with previous Orders from the Energy Bureau, leave is hereby requested from this Energy Bureau for LUMA to include the Toa Baja District in subsequent quarterly reports on reliability indices, starting with the report for the period of January through March 2024. Specifically, LUMA requests leave to include the following metrics and related data from October 2023 forward in the reporting matrix: Monthly SAIDI Distribution-Toa Baja; Monthly SAIDI Transmission Substation-Toa Baja; Monthly SAIDI (T&D)-Toa Baja; Monthly SAIFI Distribution-Toa Baja; Monthly SAIFI Transmission Substation-Toa Baja; Monthly SAIFI (T&D)-Toa Baja. The reliability data pertaining to the Toa Baja District was being reported within the Bayamón District. The requested change will ensure reporting is done based on a proper alignment of districts as they relate to LUMA's operations. It is respectfully submitted that this change to add the Toa Baja District to the reporting matrix will ensure transparency in the data being reported to this Energy Bureau.

B. Restated Values

In furtherance of its continued efforts to improve its processes in alignment with industry standards, LUMA continually reviews and adjusts System Data to incorporate improved and accurate data. In this submission of System Data, LUMA is including restated values for several metrics, including corrected data from June 2021 to September 2023 for the Transmission Line Inspections-System metric, Distribution Line Inspections-System metric, and T&D Substation Inspections-System metric.

LUMA is submitting restated values for February 2023 through September 2023 on several Renewable Energy and Demand Side Management metrics to reflect actual data involving EcoEléctrica and AES. The restated data involves the following metrics: Purchased Energy from Thermal PPOA's-Total EcoEléctrica and AES; Cost of Capacity Purchased from Thermal PPOA's- EcoEléctrica and AES; and Cost of Energy (base + excess) Purchased from Thermal PPOA's- EcoEléctrica and AES.

LUMA is also submitting restated values for June 2021 through September 2023 for the Cost of energy (base + excess) purchased from Thermal PPOA's – EcoEléctrica and Cost of energy (base + excess) purchased from Thermal PPOA's – AES to correct the unit of measure to MWh. Both metrics were previously reported as kWh.

In addition, LUMA is submitting restated values for April 2022 through June 2023 for the Total Installed Distributed Generation Capacity – Photovoltaic: San Juan metric, to correct a data entry error regarding the capacity of DG installations in the San Juan District.

Furthermore, LUMA is submitting restated values for the Incremental Installed BESS Capacity – Yauco metric, to correctly reflect the incremental capacity for the period between January 2022 and September 2023.

Finally, LUMA is restating the values for February 2023 through December 2023 for the 12-Month Rolling OSHA Fatality Rate metric to properly align with the Bureau of Labor Statistics and OSHA calculation rate. See <https://www.bls.gov/opub/mlr/2022/article/challenges-in-calculating-occupational-fatality-rates.htm>

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the Quarterly Performance Metrics Report for the months of October through December 2023; and **deem** that LUMA complied with the December 21st and January 19th Orders.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of January, 2024.

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, and Genera PR LLC, through its counsel of record Jorge Fernández-Reboredo, jfr@sbglaw.com and Alejandro López Rodríguez, alopez@sbglaw.com, and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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Exhibit 1
Performance Metrics Data for October through December 2023
Files to be submitted via email in excel format.