

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

<b>NEPR</b>
<b>Received:</b>
<b>Apr 22, 2024</b>
<b>9:01 PM</b>

**IN RE:**

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Submission of Quarterly Report on System Data for January through March 2024**

**SUBMISSION OF QUARTERLY REPORT ON SYSTEM DATA FOR JANUARY THROUGH MARCH 2024  
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 20<sup>th</sup> day of the month after each quarter closes.<sup>1</sup>

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<sup>1</sup> 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).

In a Resolution and Order dated January 19, 2024 (“January 19<sup>th</sup> Order”), this Energy Bureau issued a revised data template that incorporates 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.<sup>2</sup>

Pursuant to Section 5.6 of the Puerto Rico 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, LUMA hereby submits PREPA’s system data regarding generation. All information regarding PREPA’s Generation Facilities was provided to LUMA by Genera PR, LLC, in its capacity as 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.

LUMA hereby respectfully submits the Quarterly Report on System Data covering data for the months of January through March 2024, in the template requested in the January 19<sup>th</sup> Order.<sup>3</sup>

## **II. Background on Filing of Quarterly Reports on System Data.**

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

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<sup>2</sup> Per the January 19<sup>th</sup> Order, the quarterly report with System Data for October through December 2023, was filed on January 29, 2024. See *Motion in Compliance with Resolution and Order of August 16, 2023, and Request for Confidential Treatment* (“January 29<sup>th</sup> Motion”).

<sup>3</sup> On April 3, 2023, this Energy Bureau issued a Resolution and Order titled *Updated Data Template for Quarterly Reporting*. In the April 3<sup>rd</sup> 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 19<sup>th</sup> Order, supersedes the template issued with the April 3<sup>rd</sup> Order. 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 89.

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; October 31, 2023 (submitting restated values); and January 29, 2024.

### **III. Submission of System Data for January through March 2024.**

With this Motion, LUMA is submitting System Data for the months of January through March 2024. This submission includes an Excel spreadsheet entitled “Resumen Métricas Máster\_April2024.xlsx,” with System Data in compliance with the reporting requirements set forth by this Energy Bureau in the January 19<sup>th</sup> Order.

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

LUMA is continually assessing its operational priorities to match customer needs, including making adjustments to existing operational districts to better align with the priorities of customers in those districts.<sup>4</sup> *See, Submission of Performance Metrics Report for October Through December 2023*, pp. 3-4, filed on January 29, 2024 (“January 29<sup>th</sup> Motion”). In the January 29<sup>th</sup> Motion, LUMA requested that this Energy Bureau grant it leave to include a new district, the Toa Baja District, in subsequent quarterly reports on reliability indices, starting with the report for the period of January through March 2024. Prior to this filing, the reliability data pertaining to the Toa Baja District was being reported within the Bayamón District.

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<sup>4</sup> *See also Motion in Compliance with Resolution and Order of August 16, 2023, and Request for Confidential Treatment*, filed on September 6, 2023, Exhibit 1, pp. 10 and 12; and *Submission of Performance Metrics Reports for January Through March 2023 and in compliance with the orders of January 12, 2023 and April 3, 2023*, filed on April 20, 2023, p. 12.

Specifically, LUMA requested leave to include the following metrics and related data from October 2023 onwards 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.

At the time of this filing, the Energy Bureau has not yet approved LUMA's request to include reliability indices for the new Toa Baja District in the reporting matrix. Accordingly, LUMA hereby respectfully renews its request to include the new Toa Baja District.

**B. Request to Modify Days Sales Outstanding – Government (“DSO Government”) Performance Metric.**

The current monthly Legacy Performance Metric for DSO Government includes the Contribution in Lieu of Taxes (“CILT”) and *Alumbrado* (“Street Lighting”) balances. In case NEPR-AP-2020-0025, this Honorable Energy Bureau determined to exclude the Contributions in Lieu of Taxes, Street Lighting and Uncollected Reserve Accounts from the DSO Government Metric. *See Resolution and Order on Performance Targets for LUMA Energy ServCo, LLC* issued on January 26, 2024, Case No. NEPR-AP-2020-0025, pp. 102, 104 & 115 (paragraph 75). Consequently, LUMA requests that this Honorable Energy Bureau approve a modification in the Legacy Metric for DSO Government in this proceeding, to align with the methodology adopted in the NEPR-AP-2020-0025 proceeding. Once approved the modification will be reflected in subsequent Quarterly Reports on System Data.

**C. Revisions and Restatement of Values.**

Since commencement of LUMA's work as Operator of the T&D System it has been using the Severn Trent Operational Resources Management System (“STORMS”) to extract data and report the net monthly work orders balance metric, following the same process as PREPA.

However, in furtherance of LUMA's continued efforts to improve its processes, on October 2022, a new software called LUMA Express ("LEX") was implemented and some of the work orders are now reflected in the Outage Management System ("OMS"), instead of STORMS. The LEX system and the OMS database have enabled better quality of data. However, due to current system configurations, not all historical work orders have transitioned from STORMS.

In response to a request for information issued as part of a December 21, 2023, Resolution and Order, LUMA explained that work orders are being tracked through both the STORMS and OMS systems since October 2022. In this Quarterly Report on System Data submission, LUMA revised the values for net monthly work orders balance Performance Metric for the period of October 2022 through December 2023 to include data from both STORMS and OMS. Previous reports only reflected data from STORMS.<sup>5</sup> Data for January to March 2024 is taken from the LEX and OMS systems and is consistent with the revised values for October 2022 through December 2023.

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the Quarterly Report on System Data for the months of January through March 2024; **approve** LUMA's request to report reliability metrics for the Toa Baja operational district; **approve** the requested modifications of the Legacy Metric for DSO Government; and **accept** the revisions to the work orders balance data.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of April 2024.

We hereby certify that we 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 counsel of record, Alexis

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<sup>5</sup> See RFI-LUMA-MI-2019-0007-20231221-PREB-Attachment D-6 from *Motion in Compliance with Resolution and Order of December 21, 2023*, filed on January 29, 2024.

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*Exhibit 1*  
*Performance Metrics Data for January through March 2024*  
*Files to be submitted via email in excel format.*