

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

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**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 April through June 2024**

**SUBMISSION OF QUARTERLY REPORT ON SYSTEM DATA FOR APRIL THROUGH JUNE 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 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 PR, LLC (“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, 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 April through June 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); January 29, 2024; and April 22, 2024.

### **III. Resolution and Order of July 10, 2024, regarding Updated Data Template for Quarterly Report.**

On April 22, 2024, LUMA submitted System Data for the months of January through March. *See Submission of Quarterly Report on System Data for January through March 2024* (“April 22<sup>nd</sup> Motion”). Additionally, LUMA renewed its request for 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.<sup>4</sup> In the April 22<sup>nd</sup> Motion, LUMA also requested that the Energy Bureau modify the Days Sales Outstanding-Government (“DSO Government”) metric to align with the methodology adopted in Case No. NEPR-AP-2020-0025, and provided an update on the network orders balance metric.

On July 10, 2024, the Energy Bureau issued a Resolution and Order (“July 10<sup>th</sup> Order”) approving LUMA’s requests to add the Toa Baja district to the reliability metrics in the data template and to align the DSO Government metric with the methodology adopted in Case No.

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<sup>4</sup> This request was also made in the *Submission of Performance Metrics Report for October Through December 2023*, pp. 3-4, filed on January 29, 2024. However, at the time of the filing of the April 22<sup>nd</sup> Motion, the Energy Bureau had not yet approved LUMA’s request to include reliability indices for the new Toa Baja District in the reporting matrix.

NEPR-AP-2020-0025 for the reporting cycle beginning in Fiscal Year 2025. *See* July 10<sup>th</sup> order, p. 3. Furthermore, the Energy Bureau ordered LUMA to use the existing reliability districts and DSO Government methodology for this filing on System Data for April through June 2024. *Id.* The Energy Bureau stated it will update and re-issue the data template before October 2024.

#### **IV. Submission of System Data for April through June 2024.**

With this Motion, LUMA is submitting System Data for the months of April through June 2024. This submission includes an Excel spreadsheet entitled “Resumen Métricas Máster\_July2024.xlsx,” with System Data in compliance with the reporting requirements set forth by this Energy Bureau in the January 19<sup>th</sup> Order and the July 10<sup>th</sup> Order.

LUMA is filling restated values for the OSHA Fatality and 12-Month Rolling OSHA Fatality Rate metrics to include a fatality that occurred in September 2023, that was initially classified as a non-work-related fatality. In addition, LUMA informs that from October 2023 to March 2024, a data entry error was identified for the Number of Customers Complaints Closed by Class metric with the following sub-groups: Total, Residential, Commercial, Industrial, Public Lighting, Agriculture, Other. The claims reported previously to the Energy Bureau inadvertently contained open claims. The values for the period from October 2023 to March 2024 have been restated to reflect the correct data.

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the Quarterly Report on System Data for the months of April through June 2024; and **accept** the modifications and revisions to System Data for the OSHA Fatality, 12-Month Rolling OSHA Fatality Rate and Number of Customers Complaint Closed by Class metrics.

**RESPECTFULLY SUBMITTED.**

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

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this motion to PREPA's counsel of record, Alexis Rivera Medina, arivera@gmlex.net and Mirelis Valle Cancel, mvalle@gmlex.net, and Genera PR LLC, through its counsel of record Jorge Fernández-Reboredo, jfr@sbgblaw.com and Alejandro López Rodríguez, alopez@sbgblaw.com, and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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*Exhibit 1*  
*Performance Metrics Data for April through June 2024*  
*[Files to be submitted via email in excel format.]*