

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

NEPR
Received:
Aug 30, 2024
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IN RE:

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Motion Submitting Response to the Requests for Information issued in the Resolution and Order of August 9, 2024

**MOTION SUBMITTING RESPONSE TO THE REQUESTS FOR INFORMATION ISSUED IN THE
RESOLUTION AND ORDER OF AUGUST 9, 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:

1. On May 14, 2019, this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order requiring the Puerto Rico Electric Power Authority (“PREPA”) to submit quarterly reports on specified system data.
2. 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 System Data regarding the Transmission and Distribution System (“T&D System”).
3. On July 22, 2024, LUMA submitted System Data for the months of April through June. *See Submission of Quarterly Report on System Data for April through June 2024 (“July 22nd Motion”).*
4. On August 9, 2024, the Energy Bureau issued a Resolution and Order with the subject *Response to LUMA’s Submission of Performance Metrics Report for April through June 2024 (“August 9th Order”)* ordering LUMA to respond, within fourteen (14) days calendar days from the notification of the August 9th Order, to requests for information included in Attachment

A of the August 9th Order (“August 9th RFIs”). Thus, LUMA must submit responses to the August 9th RFI, on or before August 23, 2024.

5. On August 21, 2024, LUMA submitted a *Request for Extension of Time to Comply with Resolution and Order of August 9, 2024*, until August 30, 2024, to submit its response to the August 9th RFIs (“Request for Extension”). The Request for Extension is pending consideration by this Energy Bureau.

6. In compliance with the August 9th Order, LUMA hereby submits, as *Exhibit 1*, its responses to the August 9th RFIs.

WHEREFORE, LUMA respectfully requests that this Honorable Energy Bureau **take notice of** the aforementioned; **accept** *Exhibit 1* with LUMA’s response to the August 9th RFIs; and **deem** that LUMA complied with the August 9th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of August 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 to 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
LUMA's Response to the August 9th RFIs

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-1

SUBJECT

SAIDI

REQUEST

Explain why the annual system SAIDI (T&D) has increased in FY2024 (1,448) compared to LUMA's reported annual system SAIDI (T&D) for FY2023 (1,218).

RESPONSE

LUMA remains committed to improving the reliability of Puerto Rico's electrical grid. Our strategic initiatives are designed to elevate service quality, minimize outage duration, and fortify the overall robustness of the power infrastructure.

Since LUMA began operations, it has replaced more than 17,000 broken and failing poles, deployed 5,000 distribution automation devices, as well as cleared hundreds of miles of vegetation. Nonetheless, the infrastructure for which LUMA is responsible continues to suffer from the effects of decades of under-maintenance and under-investment, as well as five declared disasters in the past eight years. The result is that LUMA continues to make progress in conditions that continue to deteriorate.

Additionally, in the past year, LUMA experienced 59 extreme weather-related outage events, more than 33% higher than the number experienced in Fiscal Year 2023 (FY2023). The damage associated with these events produced incremental impacts on an already highly fragile system.

To mitigate the effects of these events, as well as the pre-existing damages associated with Hurricanes Maria, Irma, and Fiona, and the effects of historic under-investment and lack of maintenance, LUMA has made significant progress in Fiscal Year 2024 (FY2024) with COR3 and FEMA to receive obligations for critical projects including the first phase of an island-wide vegetation clearing program; the deployment of multiple major substation projects that will enhance resilience; and the installation of a foundational advanced metering infrastructure (AMI) that will provide higher levels of reliability, resilience, and sustainability. The impact of much of these efforts, however, will be felt more in subsequent years.

In FY2024, there were multiple specific factors associated with the increase in the System Average Interruption Duration Index (SAIDI) that could not be mitigated by all the above efforts. Some of the primary drivers behind the elevated SAIDI compared to the previous year are:

- Vegetation related events: During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIDI, with an increase of 40% of vegetation related events when compared to FY2023. This uptick resulted in a substantial contribution of over 500 million Customer Minutes of Interruption (CMI), which directly impacts over 300 minutes of overall system SAIDI. The vegetation category encompasses interruptions caused by falling trees or limbs, as well as the growth of trees, vines, and roots.
- Equipment related events: During FY2024, there was a significant rise in equipment related events. This resulted in a substantial contribution of 159 million CMI. The increased frequency of these events had a direct impact on the system SAIDI for FY2024. Equipment related events include any defective or malfunctioning equipment in the distribution system that causes interruptions to customers. Examples of such equipment include conductors, insulators, interrupting devices, arresters, structures and supports, switches, and transformers beyond others.

For updates on LUMA's efforts to improve reliability metrics during FY2024, see RFI-LUMA-MI-2019-0007-20240809-PREB-5.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-2

SUBJECT

SAIDI

REQUEST

Explain why the annual system SAIDI (T&D) has increased in FY2024 relative to PREPA's FY2020 baseline of 1,243 minutes.

RESPONSE

The increase of SAIDI for FY2024 relative to PREPA's FY2020 baseline is a result of the main drivers as discussed in response RFI-LUMA-MI-2019-0007-20240809-PREB-1.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-3

SUBJECT

SAIFI

REQUEST

Explain why the annual system SAIFI (T&D) has increased in FY2024 (8 interruptions per customer) relative to LUMA's reported annual system SAIFI (T&D) for FY2023 (7 interruptions per customer).

RESPONSE

As stated in RFI-LUMA-MI-2019-0007-20240809-PREB-1, LUMA's initiatives and commitment to improve Puerto Rico's electrical grid are key to all the advancements made to date, despite all the challenges faced.

There were multiple specific factors associated with the increase in the SAIFI In FY2024. Some of the primary drivers behind the elevated SAIFI compared to the previous year are:

- **Vegetation related events:** During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIFI, with an increase of 40% of vegetation related events when compared to FY2023. This uptick resulted in a substantial contribution of more than two million Customer Interruption (CI), this had a direct impact of over 1.3 to the overall system SAIFI. For a brief description of the vegetation related events, see RFI-LUMA-MI-2019-0007-20240809-PREB-1.
- **Equipment related events:** During FY2024, there was a significant rise in equipment related events. This resulted in a substantial contribution of three million CI. The increased frequency of these events had a direct impact of two on the SAIFI for FY2024. For a brief description of the equipment related events, see RFI-LUMA-MI-2019-0007-20240809-PREB-1.
- **Transmission and Substation (T&S) events:** During FY2024, there was a significant rise in T&S events with an increase of 14% compared to the previous year. While a significant portion of these events were short in duration, (less than 15 minutes), these events tend to impact a larger number of customers. The increased frequency of these events had a direct impact of more than two million CIs on the in SAIFI for FY2024. Transmission and Substation outages cover interruptions resulting from failures in the transmission system, including issues within the transmission segment of a substation.

For updates on LUMA's efforts to improve reliability metrics during FY2024, see RFI-LUMA-MI-2019-0007-20240809-PREB-5.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-4

SUBJECT

SAIDI

REQUEST

Explain why the districts of Barranquitas, Caguas, Guayama, Utuado, and Vega Baja experienced notably higher SAIDI levels in June 2024 compared to the past months.

RESPONSE

LUMA continues to execute island-wide efforts to improve reliability and resiliency, and as a result we expect to see improvements in the above districts. It is worth noting that the use of a specific month to assess performance of SAIDI levels in specific areas could be misleading due to the seasonal impacts of weather in Puerto Rico. These seasonal impacts cause SAIDI to trend higher in some months than in others. Reliability is typically analyzed on a multi-year basis to determine meaningful trends, because of the variation in weather and other external factors experienced over the year. LUMA's Reliability Performance Metrics are calculated in accordance with IEEE Std 1366-2012. IEEE 1366-2012 standard describes the need to have a minimum of five years of reliability data. Evaluating performance over shorter time periods is misleading and can lead to erroneous conclusions about the state of the grid.

Nevertheless, LUMA has identified specific factors that have contributed to the increase in the SAIDI during FY2024 in these operational districts. The primary drivers behind the elevated SAIDI compared to the previous year are listed below under each operational district.

Barranquitas:

- Vegetation related events: During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIDI, with an increase of 50% of vegetation related events when compared to FY2023. The increase on these events had a direct impact of four minutes on the SAIDI for FY2024.
- Equipment related events: During FY2024, there was a significant rise in equipment related events that had a direct impact of six minutes on the SAIDI for FY2024.
- Transmission and Substation (T&S) events: During FY2024, there was a significant rise in T&S related events, with an increase of 500% compared to the previous year. The increase on these events had a direct impact of two minutes on the SAIDI for FY2024.

Caguas:

- Vegetation related events: During FY2024, there was a significant rise in vegetation-related events that had a direct impact on the SAIDI, with an increase of 66% of vegetation related events when compared to FY2023. The increase on these events had a direct impact of 17 minutes on the SAIDI for FY2024.
- Equipment related events: During FY2024, there was a significant rise in equipment related events that had a direct impact of 20 minutes on the SAIDI for FY2024.
- Transmission and Substation (T&S) events: During FY2024, there was a significant rise in T&S related events, with an increase of 20% compared to the previous year. The increase of these events had a direct impact of four minutes on the SAIDI for FY2024.

Guayama:

- Vegetation related events: During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIDI, with an increase of 134% of vegetation related events when compared to FY2023. The increase on these events had a direct impact of one minute on the SAIDI for FY2024.
- Equipment related events: During FY2024, there was a significant rise in equipment related events that had a direct impact of three minutes on the in SAIDI for FY2024.
- Transmission and Substation (T&S) events: During FY2024, there was a significant rise in T&S related events, with an increase of 50% compared to the previous year. The increase on these events had a direct impact of 1.5 minutes on the in SAIDI for FY2024.

Utuado:

- Vegetation related events: During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIDI, with an increase of 38% of vegetation related events when compared to FY2023. The increase on these events had a direct impact of eight minutes on the SAIDI for FY2024.
- Equipment related events: During FY2024, there was a significant rise in equipment related events that had a direct impact of five minutes on the SAIDI for FY2024.
- Transmission and Substation (T&S) events: During FY2024, there was a significant rise in T&S related events, with an increase of 9% compared to the previous year. The increase on these events had a direct impact of five minutes on the SAIDI for FY2024.

Vega Baja:

- Vegetation related events: During FY2024, there was a significant rise in vegetation related events that had a direct impact on the SAIDI, with an increase of 48% of vegetation related events when compared to FY2023. The increase on these events had a direct impact of four minutes on the SAIDI for FY2024.
- Equipment related events: During FY2024, there was a significant rise in equipment related events that had a direct impact of six minutes on the in SAIDI for FY2024.
- Transmission and Substation (T&S) events: During FY2024, there was a significant rise in T&S related events, with an increase of 33% compared to the previous year. The increase on these events had a direct impact of two minutes on the SAIDI for FY2024.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-5

SUBJECT

SAIDI and SAIFI

REQUEST

Provide an update on the island-wide efforts that LUMA has been undertaking to improve reliability and resiliency, and state how LUMA is working to decrease SAIDI and SAIFI going forward.

RESPONSE

The following update encompasses the efforts undertaken to improve reliability and resiliency:

FEMA Funded Vegetation Clearing Program:

- To further accelerate the vegetation work, in April 2023, LUMA submitted to FEMA an initial scope of work (ISOW) to clear all 16,000+ miles of transmission and distribution lines in Puerto Rico over approximately a three-year timeframe. The first stage of this program has already started in the San Juan region. By the end of FY2025, all group A distribution regions will have initiated vegetation clearing efforts, with an estimated 3,194 miles of clearance completed. This capital remediation project, funded by non-recurring FEMA allocations, is strategically designed to prioritize system-wide reliability, ensuring maximum impact early in the process. LUMA expects this work and the Vegetation Safety and Reliability Initiative to bring important service improvements to customers across the island including a reduction in outages by up to 45% once the program is complete.

Substations:

- **Visual Inspections:** LUMA continues visual inspections of substations to identify deficiencies to help drive subsequent remediation work planning and prioritization and provide visibility to asset health/risk. Key areas assessed include (1) Overhead Hazards and Unsecure Equipment, (2) Yard (for unsafe conditions to equipment and personnel caused by erosion of the substation pad, vegetation incursion reducing the effectiveness of insulating gravel, etc.), Components (for indications of imminent failure of High Voltage (HV) equipment that can cause harm to employees or the public), and Control House (for leaking roofs or equipment enclosures). In summary, it is an inspection of the entire substation including buses, insulators, switches, fences and security, grounding, control building integrity and climate control to assess the overall condition of the facilities. LUMA completed 442 visual inspections during FY2024.
- **Transformer Testing and Oil Dissolved Gas Analysis (DGA):** LUMA has done proactive functional testing of transformers, performed along with its oil DGA. DGA of transformer oil, measuring degradation of paper insulation, moisture, and quantity of

combustible gases in oil which is a strong indicator of transformer condition/health. DGA program is targeted annually or more frequently, depending on the test results. DGA results help in identifying possible problems to make important decisions to prevent failure in a transformer, like taking the transformer out of service for repairs, reducing the load that may cause overheating or the need to process or replace the insulating oil. These actions help maximize the useful life of a transformer. LUMA completed 476 DGA tests for 455 transformers during FY2024.

- **Breaker Test and Replacement:** LUMA continues visual inspection to monitor oil levels, control cabinets, general condition, insulation medium testing, and functional testing. LUMA completed inspection and maintenance on 133 transmission breakers and 154 distribution breakers during FY2024. During this time, 97 out of service feeder breakers were restored and put back into service. In addition, 18 transmission breakers and 11 distribution breakers were unable to be restored and were replaced with new breakers.
- **Relay Testing:** LUMA has performed and continues testing of relay operation to ensure they remain within tolerance. Also, functional test from relays to breaker are performed to confirm true operation of the protection zone. LUMA tested and calibrated 341 relays at 23 substations during FY2024.
- **Thermography (IR Scans):** LUMA continues proactive IR scans of power transformers, Load Tap Changers (LTCs), potential transformers and current transformers (tanks and connections), breakers (tanks, connections, and contacts), batteries (cell connections), and arrestors, cables, terminations, and capacitor banks for "hot spots" (indicator of real-time or potential future failures). LUMA completed assessments at 211 sites and corrected 903 hot spots during FY2024.
- **Direct Current (DC) System Assessments:** LUMA continues DC system assessments, which includes visual check of fluid levels and output voltage as well as electrical testing (to ensure battery and charger are operational and no bad cells). LUMA completed preventative maintenance for 430 battery banks and replaced 21 battery banks during FY2024.

Transmission:

- **Visual Assessments:** Performed visual assessments on the 230 kV, 115 kV, and 38 kV systems to identify high risk of safety and reliability issues to help drive subsequent remediation work planning and prioritization and to provide visibility to asset health/risk. Assessments include aerial and ground patrol assessments. LUMA completed 92 visual inspections during FY2024. During these assessments, 787 structures were deemed deficient and were repaired.
- **Thermography (IR Scan):** Focused on lines experiencing trips, looking for high-resistance connections or contacts: splices, hardware, switches, etc. In so doing, we can identify equipment at or near the end of life or that presents a significant safety or reliability risk. LUMA completed 350 thermography assessments during FY2024 (16 of the 230 kV lines, 74 of the 115 kV lines, and 135 of the 38 kV lines). During these assessments, 168 hot spots were found and corrected (3 on the 230 kV lines, 39 on the 115 kV lines, and 126 on the 38 kV lines).
- **Switch Maintenance:** Performed assessments and operated transmission switches to ensure they operate correctly (including replacement if deemed necessary). LUMA assessed and performed maintenance on 285 transmission lines during FY2024.
- **Insulator Maintenance:** Conducted assessments and performed maintenance on insulators to reduce the number of trips and improve transmission line reliability. During FY2024, 1,275 insulators were assessed and maintained.

- **Pole Replacement Program:** Maximized the use of available FEMA funds, replaced and effected repairs to damaged overhead transmission poles and towers along with associated hardware and conductors. During FY2024, 103 poles were replaced.
- **Energy Wave Signal Monitoring:** Energy wave signal monitors have been installed in the majority of 230 kV Transmission Centers. This technology enables LUMA to effectively monitor the behavior of the 230 kV system, facilitating precise fault location. Furthermore, it is being explored as a valuable tool for optimizing future maintenance and prioritization decisions within the transmission system. The project is set to expand to 115 kV lines and some 38 kV lines during FY2025.

Distribution:

Visual Assessments: Performed visual assessments on the distribution system to identify high risk safety and reliability issues to help drive subsequent remediation work planning and prioritization and provide visibility to asset health/risk. Conducted 511 Feeder High Level Assessment.

- **Thermography (IR Scan):** Serves to identify equipment at or near end of life or that presents a significant safety or reliability risk by focusing on feeders experiencing the most outages, looking for high-resistance connections or contacts. As a result of 189 thermography inspections were performed for overhead and underground feeders (switching units), during FY2024. LUMA repaired 422 hotspots in different distribution feeders that prevented unplanned outages in FY2024.
- **Pole replacement:** Maximizing use of available FEMA funds, replaced and effected repairs to damaged overhead distribution poles along with associated hardware and conductors. During FY2024, 2,752 poles were replaced.

Resource Availability and Development:

- LUMA has acted throughout FY2024 to continue increasing the onboarding and deployment of experienced workers both for reliability work and outage responses. Shortly after commencement, LUMA undertook an aggressive upskilling program to bring the level of qualification of LUMA employees up to expected industry standards. The upskilling program was completed in November of FY2024 at which time LUMA had graduated 225 lineworkers to fully qualified status.
- During FY2024, LUMA continued to increase the onboarding and deployment of experienced workers both for reliability work and outage responses. This effort has been multi-pronged and includes the following key efforts and programs.
 - **Utility Fieldworkers:** It is important to note that LUMA has more than 1000 utility field workers, including lineworkers, in its Operations team. These are composed of approximately 60% by ex-PREPA employees who have deep experience and knowledge of the Puerto Rico electric system and with LUMA have received first class training and are fully equipped to work safely and effectively.
 - **Lineworker Apprenticeship Program:** Focused on developing and growing local talent. Traditionally, an apprenticeship program cannot deliver qualified workers for approximately four years as the apprentice's work through the eight stages of development from pre-apprenticeship through to the completion of the Apprentice Period. Currently there are 197 apprentice lineworkers in the program and LUMA is expecting the first graduations from the lineworker program to start in 2025.
 - **Substation Technician, Underground Residential Distribution (URD) Technician and Cyber Security Technician programs:** Added to the apprenticeships being

offered, with the URD program being the most advanced out of these three programs. Currently LUMA has 25 URD, 39 Substation and 7 Cyber Security apprentices.

- Off-island hiring programs: LUMA has instituted off-island hiring programs both within the US mainland and internationally. The US mainland program has resulted in 25 qualified worker hires, focused on attracting workers that have left Puerto Rico and had previously worked for PREPA.
- Working with the International Brotherhood of Electrical Workers (IBEW) union affiliation, LUMA can hire fully qualified lineworkers and technicians from the US mainland through the union hall. This has proven to be a very effective strategy to fill qualified resourcing gaps and help ensure that outage response and reliability focused work proceeds as needed. In FY2024, LUMA had been sustaining approximately 60 qualified resources hired through this process focused operationally on outage response and critical system maintenance. Additionally, through FY2024, approximately 200 resources have been sustained through this process to support enhancement work to the electric system that is focused on improving system reliability.
- In the second quarter of FY2024, LUMA began increasing the number of contract vegetation maintenance resources performing clearing work on the transmission and distribution system. At the beginning of October 2023, there were 458 contract full-time equivalents (FTEs) performing vegetation work in Puerto Rico. As a result of this increase in the workforce, LUMA cleared over 700 miles of transmission and distribution lines over a four-month period. The lines cleared as part of this ramp-up of resources included distribution feeders with known vegetation issues that have significantly impacted system reliability and contributed to vegetation-caused customer outages.
- LUMA has continually onboarded contractors to supplement our internal workforce with qualified personnel when needed. This includes engineering resources to conduct system analysis and develop work order packages to execute key reliability work throughout the island by internal resources and construction contractors (i.e., transmission and distribution pole, transmission and distribution line rebuild, transmission and distribution substation reliability improvements, distribution automation and vegetation work).

Distribution Automation Program:

- This program focuses on deploying equipment for grid automation. It includes deploying automated switchgear and communicating fault sensors on distribution feeders to improve reliability. The included switchgear consists of three-phase and single-phase reclosers. To further enhance reliability, LUMA will deploy automatic switching distribution feeder automation systems. Communicating fault sensors will be deployed to provide fault location information to Operations to improve service restoration times for customers. During FY2024, LUMA made significant progress with the installation of more than 5,000 devices including: the installation of three phase and single phase reclosers, cutout installations and fault indicators.
- As a result of the deployment of the 5,000 grid automation devices, LUMA has successfully reduced the overall impact of outages to the electric distribution system by over 133 million CMIs avoided and over 900,000 CIs avoided. This translates to a reduction of SAIDI over 90 minutes and reduction in SAIFI of 0.6.

Additionally, on July 19, 2024, LUMA filed its Submittal of Updated Preliminary Plan before the Puerto Rico Energy Bureau under the NEPR-MI-2024-0005 docket. For further details on LUMA's projects to

improve system reliability, please refer to this filing. The impact of much of these efforts, however, will be felt more in subsequent years.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-6

SUBJECT

OSHA Severity Rate

REQUEST

Explain why LUMA's reported OSHA severity rate for FY2024 has increased relative to FY2023.

RESPONSE

LUMA maintains a strong safety program dedicated to proactive risk mitigation and incident prevention. As a result, OSHA Recordable Rate and OSHA DART Rate for FY2024 are lower when compared to FY2023. However, specific factors contributed to an overall increase in OSHA Severity Rate for FY2024.

The OSHA Severity Rate for FY2024 was disproportionately impacted by two incidents with significant lost-day consequences (180 lost days each; 360 lost days total) in December 2023¹, as well as the fact that the number of hours of work performed in FY2024 has increased by more than 1.5 million hours worked. Furthermore, external factors, such as extended wait times for follow-up appointments within the government-managed workers' compensation system, hindered employee return-to-work timelines, contributing to the overall severity rate increase.

¹ See Motion in Compliance with Order to Show Cause from June 10, 2024, at p.8 filed on June 20, 2024.

Performance Metrics

Docket Number: NEPR-MI-2019-0007

Response: RFI-LUMA-MI-2019-0007-20240809-PREB-7

SUBJECT

Number of Customers on AMI

REQUEST

Explain why the number of customers on AMI in Guánica and Peñuelas has decreased in FY2024 relative to FY2023.

RESPONSE

The change in the number of customers on AMI for Guánica and Peñuelas in FY2024 is driven by the replacement of three meters that malfunctioned and were replaced by LUMA. All meters replaced were part of the AMI pilot project initiated by the PREPA prior to LUMA's beginning of operations. Given the ongoing initiative to replace all existing meters with AMI, LUMA elected to replace the malfunctioning meters with non-AMI meters since the AMI technology implemented by the PREPA was antiquated and incompatible with LUMA's AMI program.

The reduction from 0.01% to 0.00% in Guánica was due to the removal on November 11, 2023, of one meter and the reduction in Peñuelas from 0.03% to 0.01%, resulted from the removal of two meters. These meters were removed on September 20, 2023, and June 20, 2024.