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

**IN RE: THE PERFORMANCE OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY**

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Motion in Compliance with Resolution and
Order of January 17, 2025**

MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF JANUARY 17, 2025

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, the Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in this proceeding, creating the requirement to submit quarterly reports on specified system data of the Puerto Rico Electric Power Authority (“PREPA”). 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”).¹

¹ LUMA has submitted quarterly reports on system data and updates, as 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; April 22, 2024, July 22, 2024, November 20, 2024, and January 21, 2025.

2. On August 9, 2024, the Energy Bureau issued a Resolution and Order (“August 9th Order”) whereby it required that LUMA and Genera PR LLC (“Genera”) answer requirements of information regarding System Data submitted with the Quarterly Report on July 22, 2024.

3. On August 30, 2024, LUMA submitted a *Motion Submitting Response to the Request for Information Issued in the Resolution and Order of August 9, 2024*, with responses to the Requests for Information issued to LUMA in the August 9th Order (“August 30th Motion”).

4. On October 18, 2024, this Energy Bureau issued a Resolution and Order (“October 18th Order”), whereby, among others, it directed LUMA to align the data reported in this instant docket with the performance metric approved in *In re: Performance Targets for LUMA Energy Servco, LLC.*, Case No. NEPR-AP-2020-0025 (“LUMA’s Targets Proceeding”), and extended the original reporting deadline for the upcoming quarterly report from October 20, 2024, to November 20, 2024.

5. In the October 18th Order, the Energy Bureau also issued a revised data template that included the revisions adopted in the July 10, 2024, Resolution and Order,² new metrics adopted in LUMA’s Targets Proceeding, a new methodology tab, eliminated previously required metrics, and ordered its prospective use beginning with the first quarter of Fiscal Year 2025. *See id.* at pp. 4-6.

6. On November 20, 2024, LUMA submitted a motion titled *Motion Submitting Quarterly Report on System Data for July through September 2024 and in Compliance with Order of October 18, 2024*, whereby it filed the Quarterly Report on System Data for July through September 2024, based on the revised data template issued in the October 18th Order (“November 20th Motion”).

² On July 10, 2024, the Energy Bureau issued a Resolution and Order (“July 10th Order”) whereby, among others, stated that it would update and re-issue its data template before October 2024.

7. On December 26, 2024, the Energy Bureau issued a Resolution and Order (“December 26th Order”) whereby, among others, it requested additional information from LUMA “to determine whether performance should be designated as improved or not improved”. *See* December 26th Order at p.6. The Energy Bureau also issued its Attachment C containing Requests for Information (“ROIs”) for LUMA, due on or before January 15, 2025.

8. On January 15, 2025, LUMA submitted its *Motion in Compliance with Resolution and Order of December 26, 2024*, in compliance with the December 26th Order. (“January 15th Motion”).

9. On January 17, 2025, the Energy Bureau issued a Resolution and Order whereby, among others, it ordered LUMA and Genera to respond to the new ROIs included as Attachment A and use the data template included as Attachment B for all future quarterly reports, beginning with FY2025 Q3 (“January 17th Order”).

10. Specifically, Attachment A requested that LUMA:

1. Refer to the Methodology tab of "Resurnen-Metricas-Master_November2024". Please define "offered interactions" as used in the methodology of Call abandonment rate.
2. In the NEPRAP-2020-0025 proceeding, there are three metrics that include "Inspections & Targeted Corrections" in the name. In this proceeding, these metrics are named "Distribution line inspections", "Transmission line inspections", and "T&D substation inspections".
 - a. Define a targeted correction and how it is tracked regarding this metric.
 - b. State if and how LUMA includes the number of targeted corrections in the calculation methodology for these three metrics.
3. Provide a list of metrics in this proceeding that LUMA reports on more often than a quarterly basis (e.g., monthly, weekly, daily) in other dockets or venues. For each listed, include the docket or venue in which LUMA reports each metric.
4. Provide a list of metrics that LUMA has the ability to report on more often than a quarterly basis. For each listed, state the level of frequency with which LUMA could provide preliminary numbers (e.g., monthly, weekly, daily).
5. For any metrics not listed in questions 3 and 4 above, explain why LUMA cannot provide preliminary numbers more often than a quarterly basis.

See January 17th Order, p.6.

11. As Exhibit 1 to this Motion, LUMA respectfully submits its responses to the ROIs included in Attachment A of the January 17th Order. *See* Exhibit 1.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the responses submitted herein as Exhibit 1; and **deem** LUMA in compliance with the January 17th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of February 2025.

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@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

Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-1

REQUEST

Refer to the Methodology tab of “Resumen-Metricas-Master_November2024”. Please define “offered interactions” as used in the methodology of Call abandonment rate.

RESPONSE

The offered interactions refer to the total number of incoming calls that reach the call queue, including those answered by a representative, abandoned callers, or those handled by the Interactive Voice Response (IVR) system for self-service, for example, payments processed through the IVR that do not require an advisor’s assistance. In addition, “interactions” would also include emails and social media received in the contact center; however, these would not impact the abandoned rate.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-2

REQUEST

In the NEPR-AP-2020-0025 proceeding, there are three metrics that include "Inspections & Targeted Corrections" in the name. In this proceeding, these metrics are named "Distribution line inspections", "Transmission line inspections", and "T&D substation inspections".

- A) Define a targeted correction and how it is tracked regarding this metric.
- B) State if and how LUMA includes the number of targeted corrections in the calculation methodology for these three metrics.

RESPONSE

- A) Targeted corrections refer to the high-risk safety issues to either the public or workers identified by the inspections. These findings are classified as Category 0 and Category 1 and incorporated into a plan to address. The plan considers a coordinated approach to remediation based on severity and risk according to the objectives defined in LUMA's Recovery Transformation Framework.

These metrics track the number of inspections (distribution line, transmission line, and substation inspections) that have been performed by LUMA, and the targeted corrections are identified as an outcome of these inspections.

- B) As referred to in part A of this response, the calculation methodology for these metrics is limited to the number of inspections that have been performed by LUMA. These metrics represent the total number of lines and substations inspected during the period, and the targeted corrections are identified as an outcome of these inspections.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-3

REQUEST

Provide a list of metrics in this proceeding that LUMA reports on more often than a quarterly basis (e.g., monthly, weekly, daily) in other dockets or venues. For each listed, include the docket or venue in which LUMA reports each metric.

RESPONSE

The following statistics are reported monthly to the Puerto Rico Institute of Statistics (for www.indicadores.pr database) and the U.S. Department of Energy (Form EIA-861M): Number of customers by customer class (subgroups: Total, Residential, Commercial, Industrial, Public Lighting, Agriculture and Others); Monthly system peak; Average revenue per kilowatt-hour sold and Monthly system sales by customer class (subgroups: Total, Residential, Commercial, Industrial, Public Lighting, Agriculture and Others). In addition, for the U.S. Department of Energy form, the Total installed distributed generation capacity – Photovoltaic (subgroup: Total) and Total number of distributed generation installations – Photovoltaic (subgroup: Total).

The Monthly system sales by customer class (subgroups: Total, Residential, Commercial, Industrial, Public Lighting, Agriculture and Others) are also reported monthly to the Puerto Rico Public-Partnerships Authority (Monthly Operating Report).

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-4

REQUEST

Provide a list of metrics that LUMA has the ability to report on more often than a quarterly basis. For each listed, state the level of frequency with which LUMA could provide preliminary numbers (e.g., monthly, weekly, daily)

RESPONSE

The Quarterly Report on System Data is a complex and extensive report with a mix of five hundred and ninety-four (594) statistics or metrics that are reported under specific and unique reporting requirements. The reporting requirements include seven different templates (*Resumen Metricas Master*, and the Performance Metrics by Area for Customer Service, Finance, Operation, Overall System, Transmission Distribution, Renewable, and DSM Active) where data is displayed on a monthly view from June 2021 onward. Reporting on a quarterly basis ensures a constant flow of consistent, robust, and reliable data throughout the year, maintaining a balance between the benefits of accurate and comprehensive reporting, and the costs associated with a Quarterly Report on System Data submission.

LUMA has developed processes that coexist with the need to produce quality reporting while operating the Transmission and Distribution System. The process to produce the Quarterly Report on System Data begins forty-five (45) days in advance of each report's due date, and it involves 46 employees from 19 different areas with different roles and responsibilities. In most cases, these employees are assigned temporarily to perform the tasks related to the Quarterly Report on System Data, since data is not produced or extracted in the same form as it is reported and thus requires manual manipulation. The relevant System Data is retrieved in various ways from a diverse set of data sources. A total of 49 data sources are currently needed for this Quarterly Report to be developed, including the processing of manual entries, quality control and assurance processes, and subject matter expert review of pertinent System Data. The overall estimated time in hours needed to perform all data entry, data gathering, data clean-up, data processing, metric calculation, data validation, and quality management is approximately 430 hours. The time investment is significant per submission and —depending on how often reporting is required— multiple iterations of the same steps will need to be performed to produce accurate data. Although LUMA may report a few statistics in other venues, the Quarterly Report on System Data is a complex and singular report. Therefore, an increase in the frequency of reporting, even if applicable only to a limited number of metrics, would still require increasing the number of resources that must be allocated in order to meet the reporting requirements under docket NEPR-MI-2019-0007.

LUMA understands that a quarterly cadence is reasonable and contributes to more efficient reporting, showing cumulative progress for a longer period. Thus, LUMA does not support more frequent reporting under this proceeding.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-5

REQUEST

For any metrics not listed in questions 3 and 4 above, explain why LUMA cannot provide preliminary numbers more often than a quarterly basis.

RESPONSE

See ROI-LUMA-MI-2019-0007-20250117-PREB-Attachment A-4.