

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

**NEPR**

**Received:**

**Apr 21, 2025**

**7:01 PM**

**IN RE:**

THE PERFORMANCE OF THE PUERTO  
RICO ELECTRIC POWER  
AUTHORITY

**CASE NO.: NEPR-MI-2019-0007**

**SUBJECT: Motion Submitting Quarterly Report  
on System Data for January through March 2025**

**MOTION SUBMITTING QUARTERLY REPORT ON SYSTEM DATA FOR  
JANUARY THROUGH MARCH 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:

**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. 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”). As instructed by the Energy Bureau, LUMA is submitting PREPA’s system data regarding generation. All information regarding PREPA’s Generation Facilities was provided to LUMA by Genera PR, LLC (“Genera”), 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 for January through March 2025. As explained forthwith, LUMA is submitting restated values for the “Day Sales Outstanding (“DSO”)(FYTD)-Government Customers” and “J.D. Power Customer Satisfaction Survey (FYTD) – Business Customers” metrics. Further, LUMA explains that no results will be submitted for the “J.D. Power Customer Satisfaction Survey (FYTD) – Residential Customers” metric, given that the survey results are expected no earlier than May 2025. The results will be submitted for the July 2025 System Data Quarterly Report.

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

On June 22, 2021, LUMA submitted the quarterly performance metrics for March, April, and May 2021, with performance data prior to Interim Service Commencement, which occurred on June 1, 2021. Since then, LUMA has submitted quarterly reports on system data and updates, as requested by the 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.

## **III. Submission of System Data for January through March 2025.**

With this Motion, LUMA is submitting System Data for January through March 2025. This submission includes an Excel spreadsheet entitled “Resumen Métricas Máster\_April2025.xlsx.”

The Quarterly Report on System Data for January through March 2025 is based on the revised data template issued by this Energy Bureau with a Resolution and Order dated October 18, 2024 (“October 18<sup>th</sup> Order”) and the Resolution and Order dated January 17, 2025 (“January 17<sup>th</sup> Order”). This filing also complies with the requirements of the January 17<sup>th</sup> Order that directed LUMA to provide historical data since the commencement of operations for those metrics for which LUMA modified the methodology. Moreover, it complies with the requirements of the October 18<sup>th</sup> Order to align the reported metrics in the instant proceeding with the Performance Metrics approved in LUMA’s Targets Proceeding, Case No. NEPR-AP-2020-0025 *In re: Performance Targets for LUMA Energy Servco, LLC* (“LUMA’s Targets Proceeding”).

#### **IV. Restated Values for the DSO (FYTD)-Government Customers Metric.**

As advanced above, LUMA is restating the values reported for the DSO (FYTD)-Government Customers metric from July through September 2024. The calculations presented for the DSO (Days Sales Outstanding) (FYTD) – Government Customers metric for the first quarter of fiscal year 2025 inadvertently included data from Contribution in Lieu of Taxes (“CILT”) and Public Lighting. The data source initially used for the Government Accounts Receivable did not fully account for the specific exclusions approved for the DSO (FYTD)- Government Customers metric calculation.

Upon further review, LUMA has identified a more accurate and appropriate data source for the Government Accounts Receivable. The new data source is the RCV0023 report, which provides a more precise and relevant figure for this calculation, excluding CILT and Public Lighting. Thus, LUMA has revised the methodology to ensure that the Government Accounts Receivable data is now sourced exclusively from the RCV0023 report, aligning with the Fiscal Year to Date (“FYTD”) approach and corrected the values previously reported from July 2024 through September 2024.

**V. Restated Values for the J.D. Power Customer Satisfaction Survey (FYTD) – Business Customers.**

LUMA is restating the values of the J.D. Power Customer Satisfaction Survey (FYTD) – Business Customers metric for the quarterly reports submitted in July 2024 and November 2024. Upon review, LUMA inadvertently reported a score representing the quarterly score instead of the FYTD score for the end of Fiscal Year 2024. In addition, for November 2024, the score submitted represents a calendar year-to-date score instead of an FYTD score. LUMA has corrected the values in this filing.

In addition, since the scores received in July of every year for the J.D. Power Customer Satisfaction Survey (FYTD) – Business Customers metric reflect the end of fiscal year results, this will be reported below June’s column, when submitting the data for the first quarter, to represent the fielded period and proper fiscal year accurately (as surveys are conducted from February to May of each year).

**VI. Data Delay and New Survey Methodology for the J.D. Power Customer Satisfaction Survey (FYTD) – Residential Customers Metric.**

Surveys for January through March 2025 were delayed because of the contract renewal process with J.D. Power that began in June 2024 and was finalized by February 19, 2025. Thus, with this filing, LUMA will not be able to report a score for the J.D. Power Customer Satisfaction Survey (FYTD) – Residential Customers metric. Results are expected to be received in May 2025 and will be reported in the next quarter’s report scheduled for submission in July 2025.

In addition, LUMA hereby informs the Energy Bureau that J.D. Power has introduced a new methodology for its survey as part of its 2025 Utility Research Modernization that impacts all electric, gas, and water utilities, as well as other industries. According to J.D. Power, this methodology will continue measuring transactional and operational experiences while emphasizing

emotional and relationship-oriented experiences. This change will be implemented in the residential customer survey, scheduled from May to July 2025, with results expected by August 2026.<sup>1</sup>

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the Quarterly Report on System Data for January through March 2025; and **deem** LUMA in compliance with its reporting requirements.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 21<sup>st</sup> day of April 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](mailto:arivera@gmlex.net) and Mirelis Valle Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net), and Genera PR LLC, through its counsel of record Jorge Fernández-Reboredo, [jfr@sbgbllaw.com](mailto:jfr@sbgbllaw.com), and the Independent Consumer Protection Office, Hannia Rivera Diaz, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov).



**DLA Piper (Puerto Rico) LLC**  
500 Calle de la Tanca, Suite 401  
San Juan, PR 00901-1969  
Tel. 787-945-9132  
Fax 939-697-6102

*/s/ Yahaira De la Rosa Algarín*  
Yahaira De la Rosa Algarín  
RUA No. 18061  
[yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com)

<sup>1</sup> Although Business Customers surveys will eventually adopt the new methodology, J.D. Power has not yet determined whether these changes will be implemented for this calendar year's surveys.

*Exhibit 1*  
*System Data for January through March 2025*  
*Files to be submitted via email in Excel format*