NEPR

Received:

May 30, 2025

4:56 PM

COMMONWEALTH OF PUERTO RICO PUBLIC SERVICE REGULATORY BOARD PUERTO RICO ENERGY BUREAU

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY'S EMERGENCY RESPONSE PLAN

CASE NO.: NEPR-MI-2019-0006

SUBJECT: Motion Submitting LUMA's After-Action Reports and Training Review Process

MOTION SUBMITTING LUMA'S AFTER-ACTION REPORTS AND TRAINING REVIEW PROCESS

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and LUMA Energy Servco, LLC ("ServCo") (jointly referred to as the "Operator" or "LUMA"), and, through the undersigned legal counsel, respectfully states and submits:

1. Pursuant to Section 6 (m) of Act 83 of May 2, 1941, as amended ("Act 83") and Section 4.2(g) of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement of June 22, 2020 ("T&D OMA"), LUMA —acting as agent of the Puerto Rico Electric Power Authority ("PREPA") with regards to the operation of the electric grid— has submitted an update to its Emergency Response Plan ("ERP") with Puerto Rico Government authorities, including this Energy Bureau, each year on or before May 31st for their information as required by law.

2. On May 30, 2023, LUMA filed before the Puerto Rico Energy Bureau ("Energy Bureau") LUMA's 2023 annual report on emergency preparedness for the Puerto Rico transmission and distribution system ("T&D System") ("2023 Annual T&D Emergency Preparedness Report"), pursuant to Section 6 (m) of Act 83 of May 2, 1941, as amended.

-1

On August 16, 2023, the Energy Bureau entered a Resolution and Order ("August 16th Order") whereby, among other considerations, it ordered LUMA to:

vi. provide 45 days after the end of the first quarter in Fiscal Year 2024 and quarterly thereafter, a report of the training on the ERP that was conducted prior to June 1st as specified in the training criteria set forth in the LUMA 2021 ERP at page 83, Section C. Training.

See August 16th Order, p. 19.

4. On May 31, 2024, LUMA filed before the Energy Bureau LUMA's 2024 annual report on emergency preparedness for the Puerto Rico transmission and distribution system ("T&D System") ("2024 Annual T&D Emergency Preparedness Report").

5. On July 24, 2024, the Energy Bureau entered a Resolution and Order ("July 24th Order") acknowledging the ERPs submitted by LUMA, Genera, and PREPA for the year 2024 pursuant to Section 6(m) of Act 83. The Energy Bureau conditionally approved LUMA's ERP for the year 2024 ("2024 T&D ERP"), subject to compliance with certain modifications included in the July 24th Order.

6. As to the ERPs to be submitted from 2025 and onward, the Energy Bureau stated that the development and review process should include a process whereby Energy Bureau will collaborate with the electric utility entities to develop their ERPs. The Energy Bureau directed that LUMA, PREPA, and Genera file their proposed ERP before the Energy Bureau on or before December 15th of each year. In addition, the Energy Bureau included several orders for items to be considered and/or included in the ERPs to be submitted for subsequent years.

7. Among those additional orders to be considered and/or included in the ERPs to be submitted for subsequent years, the Energy Bureau instructed LUMA to provide, among other matters, within the next fifteen (15) days, reports of the After-Action Reviews that have been conducted after incidents and tabletop, functional or full-scale exercises since the filing of the

-2

preceding T&D ERP. In addition, it ordered LUMA to provide 45 days after the end of the first quarter in Fiscal Year 2024 and quarterly thereafter, a report of the training on the ERP that was conducted prior to June 1 as specified in the training criteria set forth in the LUMA 2021 ERP at page 83, Section C. Training.

8. On August 8, 2024, LUMA filed a *Motion in Compliance with the Resolution and Order of July 24, 2024*, whereby it submitted an *After-Action Report* comprising the After-Action Reviews conducted since the filing of the preceding T&D ERP.

9. On November 14, 2024, LUMA filed a *Motion in Compliance with the Resolution and Order of July 24, 2024, and Request for Modification to Reporting Cadence*. Thereby, LUMA submitted its report on Training and Exercise. Further, LUMA requested the Energy Bureau to consider modifying the reporting cadence of this report to an annual basis rather than the current quarterly reporting frequency. Thus, the annual report would be filed on or before May 31st of every year. LUMA understands that this revised cadence would allow reporting data to include lessons learned from activations and courses developed in response to emerging needs. Similarly, LUMA would be better positioned to integrate necessary adjustments based on evaluating *After-Action Reports*.

10. On December 10, 2024, the Energy Bureau issued a Resolution and Order accepting the assertions of the benefit that will inure with annual rather than quarterly filing of this information and approving LUMA's request to change the cadence of Testing and Exercise reporting from quarterly reporting to annual reporting ("December 10th Order").

11. In compliance with the December 10th Order, LUMA hereby submits the After-Action Reports and Training Review Process as Exhibit 1 to this Motion.

-3

WHEREFORE, LUMA respectfully requests that the Energy Bureau take notice of the aforementioned, accept LUMA's After-Action Reports and Training Review Process submitted as Exhibit 1, and deem LUMA complied with the Resolution and Order of December 10, 2024.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of May 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 Alexis Rivera, <u>arivera@gmlex.net</u>, Mirelis Valle, mvalle@gmlex.net, and Natalia Zayas Godoy, <u>nzayas@gmlex.net</u>, and counsel for GeneraPR LLC, Jorge Fernández, jfr@sbgblaw.com, and Alejandro López, <u>alopez@sbgblaw.com</u>.



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 NÚM. 18,061 yahaira.delarosa@us.dlapiper.com Exhibit 1

After-Action Reviews and Trainings Annual Report

NEPR-MI-2019-0006

May 30, 2025

LUMA Energy



Contents

Table	s & Figures	2
1.0	Introduction	3
2.0	After-Action Review Reports Process	3
2.1	Action items (as per AAR / IP) for ERP	4
2.2	Action items (as per AAR / IP) from Functional and Tabletop Exercises	10
3.0	Training and Exercise Continuous Efforts	11
3.1	Individual	
3.2	External	
3.3	Collective	13

Tables & Figures

Table 1: Activations Findings	4
Table 2: Training and Exercises Findings	
Figure 1: Training Flowchart	12
Table 3 Individual Training	13



1.0 Introduction

Emergency preparedness is a daily, year-round priority for the men and women of LUMA, which takes key actions throughout the year to maintain a high level of readiness to respond to hurricanes and emergencies in accordance with its Emergency Response Plan (ERP). These actions include preparing an emergency workforce of more than 4,000 men and women who are **continuously working to effectively respond to emergencies**, conducting more than 39,000 hours of Federal Emergency Management Agency (FEMA) training on emergency management best practices, coordinating with emergency partners, critical services and mayors to maintain regular communication about LUMA's progress and work, and launching customer notifications and updates to provide customers with restoration updates on reported service interruptions when outages do happen.

In accordance with the Resolution and Order (R&O) dated July 24, 2024, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2019-0006 In Re: Emergency Response Plan, LUMA is required to provide, at the time of each annual ERP filing, the After- Action Reviews (AARs) that have been conducted following incidents and tabletop exercises, functional or full-scale, since filing the preceding ERP. Furthermore, on December 10, 2024, the PREB approved LUMA's request to change the cadence of the trainings report from quarterly to an annual reporting. In compliance with these directives, this report provides a detailed account of the AARs, along with the training and exercise activities undertaken by LUMA during fiscal year 2025.

2.0 After-Action Review Reports Process

The LUMA Emergency Preparedness Department employs a structured process to evaluate improvement plans, ensuring lessons learned from emergency responses and exercises are effectively integrated into the ERP. The process is outlined in section 12.5 After Action Review of the ERP.

For emergency activations, two months after the demobilization, the AAR report will be approved by the Incident Commander (IC) and distributed to all stakeholders. A debrief meeting follows to discuss findings, share insights, and establish action items for improvement.

A similar process is followed for the exercises' AARs, where the improvement plan and recommendations are available through SharePoint and distributed to relevant departments, to ensure transparency and accountability. Regular updates and adjustments are made to the protocols based on the implementation status and any emerging challenges, fostering a dynamic and responsive cycle of improvement.

The next critical step involves revising the ERP to incorporate the new improvements. This includes updating procedures, protocols, and guidelines to reflect the latest lessons learned. The updated ERP is socialized and available to all employees, stakeholders and regulatory agencies, then tested through various exercises and drills to validate its effectiveness. Seminars, tabletop exercises, and mock drills are conducted to identify any further adjustments needed and to ensure the improvements enhance the overall emergency response capabilities.

Ultimately, this process fosters a culture of continuous improvement within LUMA. LUMA ensures that its emergency response strategies remain robust, adaptive, and resilient by regularly reviewing and updating the ERP based on ongoing exercises, real-world events, and stakeholder feedback. This approach not



only strengthens preparedness but also ensures a more effective and coordinated response to future emergencies.

2.1 Action items (as per AAR / IP) for ERP

The following is a comprehensive list of action items based on hotwash sessions and AARs of LUMA Emergency Operations Center (LEOC) activations from June 1, 2024, until May 30, 2025. By systematically analyzing the findings and recommendations from hotwashes and AARs, an effective plan can be developed to address shortcomings and capitalize on successes. This is vital for LUMA and the ERP's continuous improvement. The information, arranged in a table, aims to ensure that lessons learned are incorporated into future actions, enhancing overall performance and productivity. Table 1 outlines the key action items derived from these reports and serves as a roadmap for changes and improvements to the ERP. The table is divided by activation and includes the suggested Area for Improvement (AFI) and respective recommendations.

Event	From	Area for Improvement (AFI)	Recommendation
	LEOC AAR	Follow the appropriate steps before staff augmentation	• Develop and distribute detailed guidelines outlining the roles and responsibilities or a staff augmentation of a one-pager / checklist.
Outage Event June 2, 2024	LEOC AAR	Alignment: There is a need for better alignment between Knowledge Areas. Determine who makes the calls to activate contracts	 Designate specific roles responsible for vendor communication and formalize this in the protocol. Periodically review and update the protocol to reflect any changes in team structure or vendor relationships.
	LEOC AAR	Damage assessment	• Develop a better method to track Damage Assessment (DA) and streamline the process of collecting and submitting information to Planning & Intelligence during emergencies and in a steady state.
	LEOC AAR	Weather Information	• Add all Local Emergency Response (LER) personnel to the mailing list for weather reports.

Table 1: Activations Findings



Event	From	Area for Improvement (AFI)	Recommendation
	LEOC AAR	Staffing and Personnel Rotation	 Improve workforce resilience to maintain operational effectiveness during extended events. Establish sustainable staffing models for emergencies within the section or department. Reduce fatigue and prevent burnout among emergency personnel.
	LEOC AAR	Resource Accountability	• Ensure all resources deployed during an emergency or incident are properly accounted for through consistent check-ins and submission of documentation, providing a clear audit trail, improving safety, and enhancing accountability.
TS Ernesto August 12-21, 2024	LEOC AAR	Role-Specific Competency and Training	• Ensure training activities are better integrated with ongoing LEOC operations to prevent disruptions and enhance the documentation of resource allocation.
	LEOC Digital hotwash	Protocol for LEOC role activation to avoid burning personnel before needed	 Develop System Operation Principles for a clear activation procedure, consider virtual activation. Include Standard AAR and hotwash template.
	LEOC Digital hotwash	Integration of Training with Operations	• Integrate training activities more effectively with ongoing LEOC operations by aligning schedules, coordinating with LEOC leadership, and standardizing documentation processes to minimize disruptions and improve resource allocation tracking.



Event	From	Area for Improvement (AFI)	Recommendation
	LEOC AAR	Adherence to Chain of Command	• Reinforce adherence to the established chain of command within the LEOC to ensure clarity of roles and responsibilities and avoid miscommunication and operational inefficiencies.
	LEOC AAR	Demobilization and Documentation Procedures	• Develop and implement a comprehensive demobilization process that clearly defines team responsibilities for documentation and submission of Preliminary Damage Assessments (PDAs), ensuring efficiency and compliance with federal guidelines.
	LEOC AAR	Procurement and Cross- Sector Collaboration	• Establish a formal mechanism for sharing best practices across LUMA Departments when activating task- unique personnel.
	LEOC AAR	Training on Digital Collaboration Tools	 Increase training on the use of real- time collaboration platforms across all departments. Ensure that all stakeholders are proficient in using digital tools for communication and coordination. Develop standard operating procedures (SOPs) for the use of these platforms during emergency responses.
	LEOC AAR	Information Flow and Communication	• Implement a real-time reporting tool accessible to all LEOC personnel, serving as the single source of truth for accurate, up-to-date information.



Event	From	Area for Improvement (AFI)	Recommendation
	LEOC AAR	Activation Process	 Improve the notification process to ensure only approved LEOC roster members receive alerts. Establish a protocol for personnel who cannot attend to secure replacements in advance and notify the Section Chief promptly.
	LEOC AAR	Incident Documentation (WebEOC)	• Update the ICS 214 board with additional fields (e.g., counters, search features), permissions, and a "Save and Submit" function to ensure standardized entry and easy classification.
General Elections November 5, 2024	LEOC AAR	Personnel Management (WebEOC)	• Add a dropdown menu for location options (e.g., LEOC, Regional Operations Command Center (ROCC) Arecibo, ROCC Bayamon) to the Check-In/Check-Out form in WebEOC.
	LEOC AAR	Incident Action Planning (WebEOC)	• Customize Incident Action Plan (IAP) forms to include rich text format, allowing copy/paste, tables, and screenshot capabilities to support complete information capture.
	LEOC AAR	Field Operations Safety Monitoring	• Activate telematics analysts for all future events, enabling the Safety Officer to request additional information after a reported accident to inform the safety messages.
	LEOC AAR	Training and Adoption	 Schedule post-storm training sessions across departments to build



Event	From	Area for Improvement (AFI)	Recommendation
			familiarity and ensure proficient WebEOC usage during activations.
	LEOC AAR	Coordination Challenges	 Implement a standardized coordination protocol to ensure all internal teams follow a unified response structure. Establish a battle rhythm by conducting regular coordination meetings between LEOC, ROCCs, and SERTs to align priorities and enhance situational awareness. Utilize WebEOC to streamline real- time updates and reduce information silos.
Island Wide Event December 31, 2024	LEOC AAR	Activation Process & Role Clarity	 Review the activation Protocol to ensure all personnel understand activation requirements. Senior leadership needs to ensure the minimum manning required for a 24/7 utility service.
	LEOC AAR	Reporting & Information Flow	• Enforce Strict Reporting Deadlines to ensure timely submission of critical updates.
	LEOC AAR	Concept of Operations	• Conduct functional and Scenario- Based Drills focused on aligning response efforts with predefined objectives.
	LEOC AAR	Situational Awareness	• Establish Backup Access Protocols to ensure system availability even in restricted scenarios.
Blackout Event	LEOC AAR	Coordination Challenges	 Integrate Supervisory Control and Data Acquisition (SCADA) and



	Event	From	Area for Improvement (AFI)	Recommendation
April 16	April 16, 2025			Outage Management System (OMS) feeds with WebEOC to reflect the live status of feeders, lines, and critical loads. • Assign regional operations personnel to update line status every two hours during events, pending full automation.
		LEOC AAR	Activation Flow	 Shift WebEOC access requests to automatic provision upon assignment to an Incident Command System (ICS) position in LEOC. Establish a dedicated emergency IT support line for WebEOC access issues active during LEOC activation. Review and revise the access workflow in ServiceNow in coordination with the Chief Information Officer (CIO) to enable an auto-approval path or alternate approvers.
		LEOC AAR	Activation Process & Role Clarity	 Review the activation Protocol to ensure all personnel understand activation requirements. Track compliance and include it in performance evaluations. Send automated reminders for on- call confirmation. Require submission of on-call rosters to Senior leadership at least 72 hours before the start of the month.



2.2 Action items (as per AAR / IP) from Functional and Tabletop Exercises

The following is a comprehensive list of action items based on hotwash sessions and after-action reviews of the exercises from June 1, 2024, until May 31, 2025. This is vital for LUMA and the ERP's continuous improvement.

Exercise	From	Area for Improvement (AFI)	Recommendation
Mock drills by ICS sections to capture WebEOC requirement August 24, 2024 – January 22,2025	AAR	WebEOC is acquired in response to AAR findings. The development involved configuring dashboards to track significant activities and resource commitments, integrating data from other systems, and aligning workflows to business processes.	 Hold multiple collaborative sessions with leadership, IT, Cybersecurity, and other subject matter experts. Dashboards created must respond to findings with Subject Matter Expert (SMEs).
	AAR	Improve clarity on roles, responsibilities, and processes for Public Information Officer (PIO) activation and operational coordination.	• Develop a clear, accessible guide on PIO activation procedures, roles, and responsibilities.
ΡΙΟ ΤΤΧ	AAR	Ensure the Standard Operating Guide (SOG) is fully aligned with the ERP and that all personnel are familiar with both.	• The Communications department should revise the SOP and ERP, incorporating the necessary changes to the SOG.
August 27, 2024	AAR	Enhance the ability to access and share real-time information across all departments.	• Implement a more robust communication system within the LEOC, incorporating advanced technology solutions for real-time data sharing.
			• Develop and enforce data- sharing protocols for timely dissemination of critical information.

Table 2: Training and Exercises Findings



Exercise	From	Area for Improvement (AFI)	Recommendation
	AAR	Better integration between Planning & Intelligence and Logistics sections	Improve cross-functional communication.
	AAR	Internal communication gaps were noted, particularly in cross- section updates.	• Standardized cross- section update process to reduce redundant information sharing.
2025 Mock Drill February 28, 2025	AAR	Variability in user proficiency led to inconsistencies in data entry.	• Implement targeted WebEOC training for all users to ensure familiarity with key functionalities.
	AAR	Minor delays in interagency coordination at the regional level	• Increase training on interagency coordination tools, including WebEOC and ICS communication protocols.
LRIAC, LNO TTX March 11, 2025	AAR	ICS forms.	• Additional training to correctly fill out ICS form 213.

3.0 Training and Exercise Continuous Efforts

LUMA personnel participate in preparedness activities throughout the year, including planning, training, and exercise activities related to their assigned ERP role. Creating a culture of preparedness results in operational excellence during activations of the ERP. Training protocols can be categorized into three main types: individual, external, and collective.

The emergency preparedness process depends on constant and effective methods to refresh and reinforce skills in preparation for restoration events. The Multi-Year Training and Exercise Plan (MYTEP) is a key component of this process, as it establishes a structured and progressive training program that aligns with LUMA's emergency preparedness objectives.



1) Individual Training:

- · Focuses on enhancing the skills and knowledge of each team member
- Tailored to individual roles and responsibilities
- Includes job-specific skill development, personal growth, and task proficiency

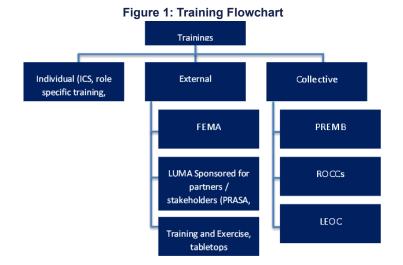
2) External Training:

- Involves learning experiences conducted by external experts or resources
- May include workshops, seminars, or courses organized outside the organization
- Provides exposure to industry best practices and new perspectives

3) Collective Training:

- Concentrates on improving teamwork, communication, and coordination among team members
- Often involves group exercises, simulations, or team-building activities
- Aimed at fostering a collaborative and cohesive work environment

These three components complement each other, contributing to a well-rounded training program that addresses individual competencies, external industry advancements, and the collective efficiency of the team (see Figure 1 below and in Preparedness Training Annex H, 2024, Section 11.4 of the 2024 ERP).



The Emergency Preparedness (EP) Department continuously evaluates training needs by reviewing After-Action Reports (AARs), incorporating recommendations, and following best practices. The Policy and Procedure Emergency Preparedness Trainings, published in March 2024 and effective since March 15, 2024, along with the Emergency Response Plan, address training requirements based on identified threats, hazards, risks, and preparedness priorities.



3.1 Individual

For the period from July 1, 2024, to September 30, 2024, LUMA personnel dedicated over 41,000 hours to National Incident Management System (NIMS) courses. These courses are designed to provide essential training, equipping personnel with the skills necessary to effectively execute emergency management functions.

Table	3	Individual	Training
-------	---	------------	----------

NIMS Course	Participants	Contact Hours
100	4,471	8,942
200	4,459	17,836
300	387	7,660
700	1,068	3,738
800	1,010	3,030
Tota	I	41,286 Hours

 January 2025 - Selected LUMA personnel completed Evaluator training. This training focused on enhancing the evaluation skills necessary for assessing emergency response actions and procedures.

3.2 External

The LUMA EP Department personnel participated in partner agencies exercises to continue practicing response skills, plan reviews, share lessons learned, and best practices as well as strengthen partnerships.

<u>Training by the Puerto Rico Emergency Management Bureau (PREMB) and the Federal Emergency</u> <u>Management Agency (FEMA) for LUMA personnel</u>

- September 29, 2024 FEMA offered training on data collection and AAR methodology to LUMA personnel and partner agencies. This training focused on enhancing the evaluation and data collection skills necessary for assessing emergency response actions and improvement plans.
- April 28 to May 9, 2025 Caribbean Preparedness Initiative. This extensive training program focused on enhancing regional emergency preparedness and response capabilities.
- November 20-21, 2024 FEMA offered, through the Puerto Rico Department of Housing (PRDoH), the MGT 341 Class, Disaster Preparedness for Hospitals and Healthcare Organizations within the Community Infrastructure.

3.3 Collective

Public Information

 August 27, 2024 – LEOC activation tabletop exercise to test communication procedures as outlined in the ERP and PIO SOG during an emergency and address shortfalls identified from previous activations. This exercise aimed to improve public communication processes during crisis.

LRIAC and LNOs

 March 11, 2025 – LEOC activation to test communication procedures during an emergency and address shortfalls identified from Hurricane Ernesto. This exercise aimed to improve coordination processes between LUMA PREMB Interagency Coordinators and other government Interagency Coordinators during crisis situations.

WebEOC

Technology can be intimidating, which is why we have developed a progressive training approach, starting with a theoretical overview and system demonstration, followed by hands-on in-person training sessions that prepare team members to use the system based on their LEOC-specific roles.

- March 7, 2025 Launched the Train-the-Trainer program to expand our pool of qualified instructors.
- ROCC training From February 6 to April 11, 2025, all ROCC personnel received in-person training in their respective regions.
- Effective April 25, 2025, LUMA Emergency Roster (LER) training sessions commenced at the LEOC. These sessions are conducted every Tuesday and Friday for a duration of two hours. The training is structured in tiers and is designed for both LEOC and ROCC personnel. Each session will conclude with a knowledge assessment, followed by certification.

Mock Drill

 February 28, 2025 – Transmission and Distribution System Operation and Maintenance Agreement (T&D OMA) Mock Drill using a Category 5 scenario in accordance with Annex I, Scope of Services, pages I-11 and I-12, under paragraph VII. Emergency Response. B9, and as required by Applicable Law. The T&D OMA requires, at a minimum, LUMA to conduct at least one system-wide test of the Emergency Response Plan processes and procedures, technical and communications equipment, and personnel readiness ("Emergency Mock Drill") per year. It further specifies the Emergency Mock Drill must take place three (3) months prior to the commencement of the Atlantic Hurricane Season.

Emergency Preparedness 365

• The Emergency Preparedness 365 Campaign began in January 2025 to promote collaboration and shared responsibility. It includes monthly emails or bulletins with tips and references for further information on emergency preparedness.

