

**GOVERNMENT OF 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: Supporting Calculations and Data
for Performance Incentive Metrics
Submitted in LUMA's April 21, 2025
Quarterly Report.

RESOLUTION AND ORDER

On May 14, 2019, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("May 14 Resolution") in which it determined that it would be in the public interest to start the Puerto Rico Electric Power Authority's ("PREPA") data gathering process to help the Energy Bureau and the stakeholders in developing measures, metrics, and targets and to provide useful information for developing incentive and penalty mechanisms. The May 14 Resolution required PREPA to provide quarterly reports of key performance metrics and indicators, beginning September 15, 2019.

On May 21, 2021, the Energy Bureau issued a Resolution and Order ("May 21 Resolution") through which it established baselines and benchmarks for certain performance metrics.¹ The Energy Bureau ordered the PREPA and LUMA Energy, LLC as Management Co., and LUMA Energy ServCo, LLC (collectively, "LUMA") to submit the required quarterly reports using the Excel template ("data template") included as part of the May 21 Resolution.

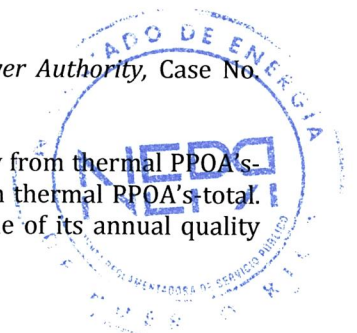
On October 18, 2024, the Energy Bureau issued a Resolution and Order ("October 18 Resolution") in which it directed LUMA to report data for all metrics approved for performance incentives in the NEPR-AP-2020-0025 proceeding ("Targets Proceeding") and to align the quarterly reporting in the instant docket with the approved methodology from the Targets Proceeding. The Energy Bureau further instructed LUMA to identify any metrics reported in the instant docket that had relied on a different methodology than what was approved in the Targets Proceeding.

On November 20, 2024, LUMA filed its *Submission of Quarterly Report Data for July through September 2024 and in Compliance with Order of October 18, 2024* ("November 20 Submission"). In this submission, LUMA filed a Quarterly Report using the revised data template in the October 18 Resolution. In its motion, LUMA explained the changes it made to align methodologies between this docket and the Targets Proceeding, provided explanations and expected reporting timelines for metrics where data was not available, clarified that it had restated FY2024 historical values for several metrics² and requested that the Energy Bureau rename metrics in this proceeding to continue aligning with the Targets Proceeding.

LUMA began reporting data starting with July 2024 values for the following new metrics, which are all performance incentive metrics approved in the Targets Proceeding, but which were not previously being tracked in this docket: J.D. Power Customer Satisfaction Survey (Residential Customers), J.D. Power Customer Satisfaction Survey (Commercial Customers), Customer Complaint Rate, Capital expenses vs. budget – Federally Funded, Capital expenses vs. budget – Non-federally funded, Net Energy Metering (NEM) Project Activation Duration, Vegetation Maintenance Miles Completed. LUMA also began reporting reliability metrics for Toa Baja. LUMA notes that J.D. Power Residential results are available quarterly in March,

¹ See Resolution and Order, *In Re: The Performance of the Puerto Rico Electric Power Authority*, Case No. NEPRMI-2019-0007, May 21, 2021 ("May 21 Resolution").

² LUMA corrected a unit conversion error for the following metrics: Purchased Energy from thermal PPOA's-EcoElectrica, Purchased Energy from thermal PPOA's-AES and Purchased Energy from thermal PPOA's-total. Additionally, LUMA restated values for SAIDI, SAIFI and CAIDI to reflect the outcome of its annual quality revision.



June, September, and December, and J.D. Power Commercial Results are available bi-annually in July and November.

In the motion accompanying its November 20 Submission, LUMA stated that it was unable to provide data for the First Call Resolution (FCR), Customers Experiencing Multiple Interruptions (CEMI), and Momentary Average Interruption Frequency Index (MAIFI) metrics. LUMA estimated it could report FCR by the second quarter of FY2026 and that it will be able to report MAIFI and CEMI values in three to five years. Also, LUMA noted it will report the annual MAIFI and CEMI metrics on a fiscal year to date ("FYTD") basis once it is able to collect the required data.

On January 17, 2025, the Energy Bureau issued a Resolution and Order ("January 17 Resolution") in which it issued a new data template to be used starting with the FY2025 Q3 submission. The new data template contains updated names for metrics whose methodology changed, according to LUMA's request to rename certain metrics in its motion accompanying its November 20 submission. The Energy Bureau requested LUMA and Genera provide with the FY2025 Q3 submission any additional recommended changes to the data template that would increase clarity or reduce confusion. The Energy Bureau also ordered LUMA to provide in FY2025 Q3 submission historical data for the new metrics or existing metrics for which LUMA has changed the methodology, dating back to when LUMA began operations.

On January 21, 2025, LUMA submitted a motion titled *Submission of Quarterly Report on System Data for October through December 2024* ("January 21 Submission"). In this submission, LUMA filed a Quarterly Report using the revised data template in the October 18 Resolution.

On April 21, 2025, LUMA submitted a motion titled *Motion Submitting Quarterly Report on System Data for January through March 2025* ("April 21 Submission"). In this submission, LUMA filed a Quarterly Report on System Data for January through March 2025 based on the revised data template in the January 17 Resolution. In its filing, LUMA provided historical data for metrics for which LUMA modified the methodology, consistent with the Energy Bureau's directives in the January 17 Resolution. LUMA noted that J.D. Power is changing its survey methodology which will affect the residential customer survey scheduled from May to July 2025, with results expected by August 2026.

Consistent with the Energy Bureau's directives, LUMA's April 21 Submission contained data from FY2021 through Q3 FY2025 on performance metrics for which there are approved targets in the Targets Proceeding. These metrics include:

- OSHA DART Rate (FYTD)
- OSHA Severity Rate (FYTD)
- OSHA Fatalities (FYTD)
- OSHA Recordable Incident Rate (FYTD)
- Operational expenses vs. budget (FYTD) - T&D
- Capital expenses vs. budget (FYTD) - Federally Funded
- Capital expenses vs. budget (FYTD) - Non-Federally Funded
- Distribution line inspections (FYTD) - System
- Transmission line inspections (FYTD) - System
- T&D substation inspections (FYTD) - System
- SAIDI (T&D FYTD) - System
- SAIFI (T&D FYTD) - System
- DSO (Days Sales Outstanding) (FYTD) - Government customers
- DSO (Days Sales Outstanding) (FYTD) - General customers
- Overtime (FYTD)
- Call abandonment rate (FYTD)
- Average speed of answer (FYTD)
- J.D. Power Customer Satisfaction Survey (FYTD) - Residential Customers



- J.D. Power Customer Satisfaction Survey (FYTD) – Business Customers
- Customer Complaint Rate (FYTD)
- Vegetation Maintenance Miles Completed (FYTD) – System
- NEM Project Activation Duration (FYTD)

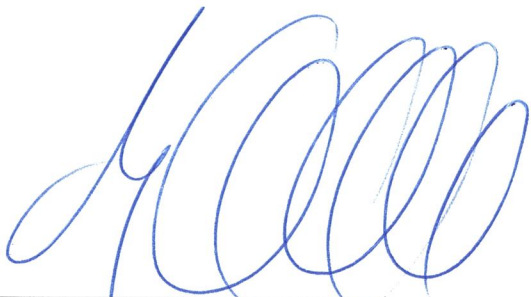
The Energy Bureau requires additional information on the underlying data and calculations for these metrics. The Energy Bureau **ORDERS** LUMA to submit additional work papers for the performance metrics listed in *Attachment A* for FY2021 through Q3 FY2025 in Microsoft Excel format, with all formulas intact. The workpapers must include the raw data used to calculate the values provided in LUMA’s April 21 Submission, must clearly demonstrate the steps taken to calculate the values, and must document the source for all data contained therein. Additionally, LUMA must include, at a minimum, the supporting data specified in **Attachment A** of this Resolution and Order.


The Energy Bureau **ORDERS** LUMA to submit supporting workpapers for the metrics discussed in this Resolution and Order with the minimum required data listed in Attachment A, **on or before twenty (20) calendar days calendar days of the notification of this Resolution and Order.**


The Energy Bureau **WARNS** LUMA that, in accordance Art. 6.36 of Act 57-2014:

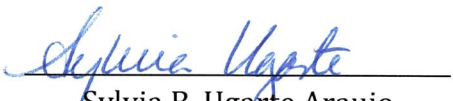
- (i) noncompliance with this Resolution and Order, regulations and/or applicable laws may carry the imposition of fines and administrative sanctions of up to \$125,000 per day; and
- (ii) for any recurrence of non-compliance or violation, the established penalty shall increase to a fine of not less than fifteen thousand dollars (\$15,000) nor greater than two hundred and fifty thousand dollars (\$250,000), at the discretion of the Energy Bureau.

Be it notified and published.



Edison Avilés Deliz
Chairman

Lillian Mateo Santos
Associate Commissioner

Ferdinand A. Ramos Soegaard
Associate Commissioner

Sylvia B. Ugarte Araujo
Associate Commissioner

Antonio Torres Miranda
Associate Commissioner

CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on June 18, 2025. I also certify that on June 18, 2025 a copy of this Resolution and Order was notified by electronic mail to jdiaz@sbgblaw.com; jennalvarez@sbgblaw.com; margarita.mercado@us.dlapiper.com, Yahaira.delarosa@us.dlapiper.com; mvalle@gmlex.net; arivera@gmlex.net; alopez@sbgblaw.com, jfr@sbgblaw.com, hrivera@jrsp.pr.gov, legal@genera-pr.com; regulatory@genera-pr.com. I also certify that on June 18, 2025, I have proceeded with filing the Resolution and Order issued by the Puerto Rico Energy Bureau.

I sign this in San Juan, Puerto Rico, on June 18, 2025.





Sonia Seda Gaztambide
Clerk

Attachment A
Minimum Required Data

The table below lists the minimum data that LUMA must include in its work papers supporting the values reported for in LUMA’s April 21 submission. LUMA need not be limited to the specific data types included in this table and should include all relevant supporting data.

Performance Metric(s)	Data Specification
<ul style="list-style-type: none">• OSHA DART Rate (FYTD)• OSHA Severity Rate (FYTD)• OSHA Fatalities (FYTD)• OSHA Recordable Incident Rate (FYTD)	Data referenced in Resumen metricas methodology tab including: <ul style="list-style-type: none">• Hours worked• Incident data• Number of active employees.
<ul style="list-style-type: none">• Operational expenses vs. budget (FYTD) - T&D• Capital expenses vs. budget (FYTD) - Federally Funded• Capital expenses vs. budget (FYTD) – Non-Federally Funded	Data referenced in Resumen metricas methodology tab including: <ul style="list-style-type: none">• Actual expenditures• Approved budget• Approved budget including 2% excess expenditures
<ul style="list-style-type: none">• Distribution line inspections (FYTD) – System• Transmission line inspections (FYTD) – System• T&D substation inspections (FYTD) – System	<ul style="list-style-type: none">• Date inspection conducted• Name of asset inspected, or other identifier• Full database of assets, and last date inspected• Identifier if corrective action required
<ul style="list-style-type: none">• SAIDI (T&D FYTD) – System• SAIFI (T&D FYTD) – System	<ul style="list-style-type: none">• Customer minutes interrupted (CMI)• Customers served (CN)• Customers interrupted (CI)
<ul style="list-style-type: none">• DSO (Days Sales Outstanding) (FYTD) – Government customers• DSO (Days Sales Outstanding) (FYTD) – General customers	Data from files referenced in the resumen metricas Methodology tab, including: <ul style="list-style-type: none">• “Finance Report Income Statement”, including Exhibits• Number of days in the period• RCV0023 report• Billed Sales and Collection report
<ul style="list-style-type: none">• Overtime (FYTD)	<ul style="list-style-type: none">• Total overtime expenses• Total non-exempt base compensation expenses
<ul style="list-style-type: none">• Customer Complaint Rate (FYTD)	<ul style="list-style-type: none">• Total NEPR-QR complaints• Total NEPR- RV complaints• Customer count
<ul style="list-style-type: none">• Vegetation Maintenance Miles Completed (FYTD) – System	<ul style="list-style-type: none">• Miles of vegetation maintenance miles completed by category (corrective, reactive, and preventative)
<ul style="list-style-type: none">• NEM Project Activation Duration (FYTD)	<ul style="list-style-type: none">• For every expedited project that is counted by the metric (completed in the year), the filing date of the complete application and the date when the net energy metering (NEM) tariff is activated on the customer’s account.• For every expedited project that is counted by the metric (completed in the year), the date of any other steps or milestones that are tracked.• For every expedited project that is counted by the metric (completed in the year), the duration of and explanation for any period <u>not</u> counted (i.e., time when LUMA “stopped the clock”) because of a customer delay.



Performance Metric(s)	Data Specification
	<ul style="list-style-type: none">Explanation of any differences in the data represented in the Portal Conexión LUMA" and the data represented in "Portal de Radicaciones Electrónicas para Proyectos" (PREP LUMA) interfaces.

