

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

NEPR

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IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Motion in Partial Compliance with
June 18, 2025, Order and Request for Extension
of Time to Comply with Inspections Metrics Data**

**MOTION IN PARTIAL COMPLIANCE WITH JUNE 18, 2025, ORDER AND REQUEST
FOR EXTENSION OF TIME TO COMPLY WITH INSPECTIONS METRICS DATA**

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. Relevant Procedural Background

The requirement to submit quarterly reports on specified system data of the Puerto Rico Electric Power Authority (“PREPA”) arises under the *Resolution and Order* issued by the Puerto Rico Energy Bureau (“Energy Bureau”) on May 14, 2019, in this proceeding. In accordance with the *Resolution and Order* issued on December 30, 2020, the quarterly system data is due on the 20th day of the month after each quarter closes.¹

¹ In a *Resolution and Order* of August 18, 2022, this Energy Bureau granted LUMA’s request to align the quarterly filings of system data in this proceeding with the filing of the quarterly operation report submitted after each quarter of the fiscal year closes. Consequently, the quarterly reports are now due in the following months: October (with data for the months of July through September), January (with data for the months of October through December), April (with data for the months of January through March), and July (with data for the months of April through June). See *Request for Modification of Schedule to File System Data and Submission of Quarterly Performance Metrics Report for June 2022* (“Request to Modify Schedule”) and Exhibit 1 (Schedule of proposed changes) and Exhibit 2 (Proposed Filing Schedule).

Pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”),² LUMA, as an agent of PREPA, submits systems data regarding the Transmission and Distribution System (“T&D System”).

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 Energy Bureau requested LUMA and Genera to 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 the historical data for the new metrics or existing metrics for which LUMA has changed the methodology, dating back to when LUMA began operations.

On April 21, 2025, based on the revised data template set forth in the January 17 Resolution, LUMA filed its *Motion Submitting Quarterly Report on System Data for January through March 2025* (“April 21 Submission”).³ Consistent with the Energy Bureau’s directives in the January 17 Resolution, LUMA provided historical data for metrics for which LUMA modified the methodology.

On June 18, 2025, the Energy Bureau issued a Resolution and Order (“June 18th Order”) whereby it stated that it required additional information on the underlying data and calculations for some of the metrics submitted in the April 21 Submission. Therefore, the Energy Bureau ordered LUMA to submit supporting workpapers for the metrics discussed in the June 18th Order,

² PREPA, Puerto Rico Public-Private Partnerships Authority (“P3 Authority”), LUMA Energy, LLC and LUMA Energy ServCo., LLC, *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (June 22, 2020).

³ On January 21, 2025, LUMA filed its *Submission of Quarterly Report on System Data for January through March 2025* (“January 21st Submission”). However, since the quarterly report was for the FY2025 Q2 submission, LUMA used the revised data template from a previous resolution. *See* October 18, 2024, Resolution and Order of October 18, 2024.

with the minimum required data listed in Attachment A, on or before twenty (20) calendar days of the notification of the order. *See* June 18th Order at 3.

II. Submission of Supporting Workpapers for Performance Metrics

In partial compliance with the Energy Bureau’s June 18th Order, LUMA hereby submits the supporting workpapers for the majority of the performance metrics listed in Attachment A of the June 18th Order for the period of July 2021 through March 2025 in Microsoft Excel format, with all formulas intact. (“**Exhibit 1**”). **Exhibit 1** contains the following titled Excel spreadsheets: 2025-06-18_R&O_NEM Project Activation Duration.xlsx, 2025-06-18_R&O_SAIDI_SAIFI.xlsx, 2025-06-18_R&O_Vegetation Maintenance Miles Completed.xlsx, 2025-06-18_R&O_Budget metrics_Overtime.xlsx, 2025-06-18_R&O_Customer Complaint Rate.xlsx, 2025-06-18_R&O_DSO.xlsx, and 2025-06-18_R&O_OSHA metrics.xlsx. The workpapers in **Exhibit 1** include the raw data used to calculate the values provided in LUMA’s April 21 Submission, demonstrate the steps taken to calculate the values, and document the source for all data contained therein, as requested by the Energy Bureau.

III. Restatement of values for NEM Project Activation Duration (FYTD) metric

In this submission, for the NEM Project Activation Duration (FYTD) metric, LUMA is providing raw data with formulas intact in the file titled 2025-06-18_R&O_NEM Project Activation Duration.xlsx. This file includes a restatement of the values previously reported for July 2024 through March 2025.

Upon review of the calculation, LUMA identified that the reported values for this period (July 2024 through March 2025) were inadvertently miscalculated. The error in calculation was the use of the monthly averages, instead of the Fiscal Year-to-Date (FYTD) average, and the inclusion of other projects, not limited to the expedited projects that are measured in this metric.

This error has been corrected in the file 2025-06-18_R&O_NEM Project Activation Duration.xlsx and the table below. LUMA will include these corrected values on the July 21, 2025, Quarterly Report on System Data.

Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25
22.24	21.15	21.73	21.89	21.17	21.69	24.16	24.30	23.55

IV. Request for Extension of Time to Submit the Data Specifications for the Inspection Metrics

Although LUMA undertook substantial efforts to submit all required information by July 8, 2025, that was not possible due to the circumstances described below. LUMA respectfully informs that it requires an extension of time to submit the data specifications for the Inspection metrics. LUMA requests until August 1, 2025, to submit the workpapers in Excel format with raw data and formulas intact from July 2021 until March 2025, in addition to the other information requested in Attachment A unrelated to the metrics' calculation, for the System's Transmission Line Inspections (FYTD), Distribution Line Inspections (FYTD) and T&D Substation Line Inspections (FYTD) metrics.

To deliver the information down to the requested level of detail (e.g. all linked by formulas for all historical data from July 2021 through March 2025), LUMA must perform substantial manual efforts that require several employees to carry out. Although LUMA has made progress in creating and consolidating data sources and repositories for information such as raw data from inspections, the current state of LUMA's data management systems is still highly manual, which represents a significant constraint in providing the data as requested by the Energy Bureau. The data is kept in several files that together form the metrics database. Due to the evolution of the data

over time, the source information for the raw data comes in different formats that requires manual intervention to review, clarify, remove duplicates/errors, and count. Furthermore, the files for each reporting period have also evolved over these past years, those historical files are the “snapshots” of the raw data in those periods and its inclusion in this process is key to providing the information requested by the Energy Bureau. To fulfill this request, LUMA will not only need to create the “formula linkages” in the current supporting files but also go back to multiple “snapshot” files to create the proper “formula linkages”, based on those previous formats and manual checks. Although the pieces of information being requested exist, the modifications necessary to cleanly meet the requirements of this current request will take, in our estimation, a month to complete.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **deem** *Exhibit 1* in partial compliance with the June 18th Order, **accept** the restatement of values for NEM Project Activation Duration (FYTD); and **grant** an extension of time, until August 1, 2025, to submit the information requested for the System’s Transmission Line Inspections (FYTD), Distribution Line Inspections (FYTD) and T&D Substation Line Inspections (FYTD) metrics.

RESPECTFULLY SUBMITTED.

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

I hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that I 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@sbgbllaw.com and Jennise M. Álvarez, jennalvarez@sbgbllaw.com, legal@genera-pr.com, regulatory@genera-pr.com and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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/s/ Margarita Mercado Echegaray

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Exhibit 1
Supporting workpapers
[Files to be submitted via email in Excel format]