

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

**NEPR**

**Received:**

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**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 April through June 2025**

**MOTION SUBMITTING QUARTERLY REPORT ON SYSTEM DATA FOR APRIL  
THROUGH JUNE 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”),<sup>1</sup> LUMA, as an agent of PREPA, submits systems 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

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<sup>1</sup> 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).

PREPA's generation facilities was provided to LUMA by Genera PR LLC, in its capacity as Operator of the Thermal Generation Facilities pursuant to the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement, executed on January 24, 2023.

LUMA hereby respectfully submits the Quarterly Report on System Data covering data for the months of April through June 2025.

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

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 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, January 21, 2025, and April 21, 2025.

## **III. Submission of System Data for April through June 2025**

With this Motion, LUMA is submitting System Data for April through June 2025. This submission includes an Excel spreadsheet entitled "Resumen Métricas Máster\_July2025.xlsx".

The Quarterly Report on System Data for April through June 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-2020-00025, *In re: Performance Targets for LUMA Energy Servco, LLC* (“LUMA’s Targets Proceeding”).

**IV. Restatement of values for Total installed distributed generation installations – Photovoltaic, Total number of distributed generation capacity – Photovoltaic and NEM Project Activation Duration (FYTD) metric**

This submission details a revision to previously reported values for distributed generation metrics on photovoltaic installations and capacity, as well as the *NEM Project Activation Duration* metric. The restatement spans the period from July 2021 to March 2025 and addresses several identified discrepancies and improvements in data collection and reporting processes.

**a. Total Number of Distributed Generation Installations – Photovoltaic**

A quality control review revealed that the data extraction query from the Customer Care and Billing (CC&B) system did not fully capture all customers registered in the Net Energy Metering (NEM) Program each month. As a result, the customer data did not align with the actual NEM registrations in the CC&B system. This issue has now been corrected by updating the report query to ensure that all monthly enrollments are included at the time of reporting.

**b. Total Installed Distributed Generation Capacity – Photovoltaic**

LUMA identified two main issues affecting this metric, the use of estimated capacity values for customers who did not submit their system specifications and the incomplete capture of month-to-month capacity fluctuations due to customer-initiated changes, such as system upscaling or downscaling.

To address these, LUMA confirmed whether customers reported their system capacity through the "Portal Conexión LUMA" and PREP LUMA portals. In addition to capturing fluctuations in the installed capacity over time to ensure a more accurate and dynamic reporting.

**c. NEM Project Activation Duration (FYTD)**

LUMA is also providing revised values for the NEM Project Activation Duration metric for the period from July 2025 through March 2025. These revisions were included as part of LUMA's *Motion for Partial Compliance with June 18, 2025, Order and Request for Extension of Time to Comply with Inspection Metrics Data* filed on July 3, 2025.

These revisions reflect LUMA's efforts to enhance data accuracy and transparency in reporting. The updates ensure that reported values align more closely with actual customer activity and system changes, providing a more reliable basis for analysis and decision-making.

**V. Request to modify data template to add all municipalities for the Percent of customers on AMI metric**

On March 2025, LUMA commenced the installation of advanced metering infrastructure ("AMI") smart meters. Exhibit 1 reflects the updated reported value for the San Juan subgroup for March 2025, incorporating the deployment of additional meters.

Given that AMI installations will continue to expand throughout the island, LUMA respectfully requests that the Energy Bureau modify the data reporting template to facilitate timely and accurate reporting of this metric. Specifically, LUMA requests that the template for the *Percent of Customers on AMI* metric be revised to include all seventy-eight (78) municipalities as subgroups. At present, the data template is limited to the following subgroups: System, Bayamón,

Caguas, Carolina, Dorado, Guaynabo, Gurabo, San Juan, Toa Alta, Toa Baja, Trujillo Alto, Guánica, and Peñuelas.

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the Quarterly Performance Metrics Report for the months of April through June 2025; **modify** the data reporting template by adding all (78) municipalities as subgroups to the Percent of customers on AMI metric; and **deem** LUMA in compliance with its reporting requirements.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 21<sup>st</sup> day of July 2025.

We 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](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@sbgblaw.com](mailto:jfr@sbgblaw.com) and Alejandro López Rodríguez, [alopez@sbgblaw.com](mailto:alopez@sbgblaw.com), and the Independent Consumer Protection Office, Hannia Rivera Diaz, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov).



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Exhibit 1  
System Data for April through June 2025  
[Files to be submitted via email in Excel format.]