

**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 Submitting Quarterly Report
on System Data for July through September 2025**

**MOTION TO SUBMIT QUARTERLY REPORT ON SYSTEM DATA
FOR JULY THROUGH SEPTEMBER 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

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 systems data regarding the transmission and distribution system (“T&D System”).

LUMA respectfully submits this motion to provide the quarterly system data for July through September 2025, formalize certain revisions to previously reported metrics, and request a limited modification to the reporting template to enhance transparency and accuracy. This filing is submitted in accordance with the Energy Bureau’s directives, including the October 18, 2024 and January 17, 2025 resolutions and orders. As detailed below, LUMA’s submission aligns the reported metrics with validated data and methodologies, ensures continuity of historical reporting

where processes have been refined, and advances consistent reporting of AMI deployment across all municipalities.

II. Background on Filing of Quarterly System Data Reports

On June 22, 2021, LUMA submitted its first quarterly performance metrics for March, April, and May 2021, with performance data before 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.

III. Submission of System Data for July through September 2025

With this Motion, LUMA is submitting System Data for July through September 2025. This submission includes an Excel spreadsheet entitled “Resumen Métricas Master_October2025.xlsx”. *See Annex 1.*

The Quarterly Report on System Data for July through September 2025 is based on the revised data template issued by this Energy Bureau with a Resolution and Order dated October 18, 2024 (“October 18th Order”) and the Resolution and Order dated January 17, 2025 (“January 17th Order”). This filing also complies with the requirements of the January 17th 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 18th 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*.

As the Energy Bureau will observe, the metrics reported for the July through September 2025 period do not include the data typically provided for the generation system owned by PREPA and compiled by LUMA in accordance with the orders issued in the captioned proceeding.

Consistent with its established practice, LUMA requested that Genera PR LLC (“Genera”), designated operator of the PREPA-owned generation system, submit its quarterly data template so that it could be incorporated into LUMA’s reporting. In response to LUMA’s communications dated September 15 and October 10, Genera informed LUMA by written correspondence on October 15, 2025, that it would submit its performance metrics independently through its legal counsel.

LUMA does not take a position on Genera’s chosen method of submission. However, LUMA respectfully requests that, should the Energy Bureau determine that Genera’s separate filing does not comply with the procedural requirements or orders governing this case, LUMA not be held responsible for the resulting omission.

IV. Restated Previously Reported Data

To ensure the clarity and completeness of the regulatory record, LUMA hereby submits corrections to: (i) the distributed generation Photovoltaic installation and capacity metrics; (ii) the Accounts Payable Days Outstanding metric; and (iii) the reliability metrics SAIDI, SAIFI, and CAIDI. These revisions arise from quality assurance reviews and methodological alignment efforts and are submitted to ensure that the reported data accurately reflects validated information and LUMA’s acknowledged reporting practices. The subsections below identify the affected periods, explain the basis for each correction, and submit the amended values for incorporation into the Energy Bureau’s record, as applicable.

In its July 21, 2025 filing titled the *Motion Submitting Quarterly Report on System Data for April through June 2025*, LUMA reported corrections to the metrics for the Total Number of Distributed Generation Installations – Photovoltaic and the Total Installed Distributed Generation Capacity – Photovoltaic, including their respective subcategories, for the period spanning July

2021 through March 2025. At the time of that submission, LUMA had not yet completed the revision of the June 2021 values for these metrics. LUMA now respectfully submits the amended June 2021 values for the Energy Bureau's consideration and to ensure the completeness and accuracy of the record.

In addition, for the Accounts Payable Days Outstanding metric, following LUMA's Interim Service Commencement Date (as defined in the T&D OMA), the accounts payable aging data was separated between PREPA and LUMA operations. This division was implemented to accurately reflect the distinct responsibilities and financial activities of each entity.

The Accounts Payable Days Outstanding metric is calculated by dividing the accounts payable balance by the average daily disbursement. However, the accounts payable balance (numerator) used in the previous calculation included only the PREPA aging report, while the disbursements (denominator) were based on a combined total from both PREPA and LUMA.

To address this inconsistency and provide a clearer and more transparent view of LUMA's accounts payable performance, this metric methodology has been amended. The revised method now aligns both the numerator and denominator to include only LUMA operations, without any exclusions. Accordingly, LUMA hereby restates the previously reported values for the Accounts Payable Days Outstanding metric for all periods beginning in July 2021.

Lastly, with respect to the reliability metrics SAIDI (System Average Interruption Duration Index), SAIFI (System Average Interruption Frequency Index), and CAIDI (Customer Average Interruption Duration Index), LUMA is correcting the Fiscal Year 2025 values to reflect the outcome of its annual quality review accurately. These corrections are necessary to ensure that the reported metrics align with validated data and are consistent with LUMA's own acknowledgment. *See LUMA's Submission of Responses to Requirements of Information in Compliance with Order*

of October 16, 2023, and Request for Extension of Time to Respond to ROI 5(c), Exhibit 1, response to ROI-LUMA-2019-0007-R2-16OCT23-013. LUMA therefore submits these corrected values for incorporation into the record so that the Fiscal Year 2025 SAIDI, SAIFI, and CAIDI metrics conform to validated data and LUMA's acknowledged reporting practices.

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

In March 2025, LUMA initiated the installation of advanced metering infrastructure ("AMI") smart meters across Puerto Rico. In light of the ongoing and expanding deployment of AMI technology throughout all municipalities, LUMA respectfully renews its request that the Puerto Rico Energy Bureau revise the existing data reporting template to ensure timely and accurate reporting of the Percent of Customers on AMI metric. Specifically, LUMA requests that the template be updated to include all seventy-eight (78) municipalities as individual subgroups.

At present, the approved 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. However, as of the date of this filing, AMI meters have also been installed in additional municipalities, including Loíza and Vieques, which are not reflected in the current template. Accordingly, LUMA respectfully urges the Energy Bureau to modify the reporting framework to incorporate all municipalities, thereby enhancing the completeness and accuracy of AMI deployment data.

VI. Request for Temporary Deferral of Certain Metrics Due to System Modifications

The implementation of the Energy Bureau's orders in Docket No. NEPR-AP-2023-0003 required modifications to the reporting tools used to calculate several metrics and their respective subgroups, effective September 2025. The metrics affected by the new reporting requirements

include: (i) Monthly system sales by customer class; (ii) Monthly sales by municipality; (iii) Average revenue per kilowatt-hour sold; (iv) Technical losses as a percentage of net generation; and (v) Generation from RPS-eligible PPOAs (as a percentage of sales).

LUMA has been diligently working to adapt its reporting systems to comply with the revised requirements. As of the date of this filing, LUMA continues to review and validate the integration of the updated data. This validation process is essential to ensure the accuracy, completeness, and reliability of the revised reports.

Accordingly, LUMA is not reporting the above-referenced metrics for September 2025 in this filing. LUMA respectfully requests that the Energy Bureau authorize the inclusion of the September 2025 data for these metrics in the following quarterly report, scheduled for submission in January 2026.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept** the quarterly performance metrics report for July through September 2025; **modify** the data reporting template by adding all (78) municipalities as subgroups to the Percent of customers on AMI metric; **grant** the deferment of the September 2025 (i) Monthly system sales by customer class; (ii) Monthly sales by municipality; (iii) Average revenue per kilowatt-hour sold; (iv) Technical losses as a percentage of net generation; and (v) Generation from RPS-eligible PPOAs (as a percentage of sales); and **deem** LUMA in compliance with its reporting requirements.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of July 2025.

It is hereby certified that this motion was filed 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@sbglaw.com and Alejandro López Rodríguez, alopez@sbglaw.com, and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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Annex 1

System Data for July through September 2025
[Files to be submitted via email in Excel format.]