

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

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

**CASE NO.:** NEPR-MI-2019-0006

**SUBJECT:** Motion Submitting LUMA’s After-Action  
Reviews and Trainings Annual Report

**MOTION SUBMITTING LUMA’S AFTER-ACTION REVIEWS AND  
TRAININGS ANNUAL REPORT**

**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 state and submit:

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 31<sup>st</sup> 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.

3. On August 16, 2023, the Energy Bureau entered a Resolution and Order (“August 16<sup>th</sup> 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 16<sup>th</sup> 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 24<sup>th</sup> 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 24<sup>th</sup> Order.

6. As to the ERPs to be submitted from 2025 onward, the Energy Bureau stated that the development and review process should include a process whereby the 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 15<sup>th</sup> 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 preceding T&D ERP. *See* July 24<sup>th</sup> Order, p. 18.

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 31<sup>st</sup> 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 10<sup>th</sup> Order”).

11. On May 30, 2025, LUMA filed before the Energy Bureau LUMA’s 2025 annual report on emergency preparedness for the Puerto Rico transmission and distribution system (“T&D System”) (“2025 Annual T&D Emergency Preparedness Report”).

12. On June 20, 2025, the Energy Bureau entered a Resolution and Order (“June 20<sup>th</sup> Order”) in which it approved LUMA’s, Genera’s, and PREPA’s 2025 revision of their ERPs. *See*

June 20<sup>th</sup> Order, p.13. In what is pertinent to this Motion, the Energy Bureau found that LUMA had complied with its directive regarding After-Action Reports and required LUMA to continue improving the After-Action Report process and to fully incorporate it into its 2026 ERP. *See id.*, p.4. The Energy Bureau further recognized that LUMA extensively addressed training and exercises in the ERP Annexes, and encouraged ongoing updates and improvements. *Id.* p. 9.

13. In compliance with the August 16<sup>th</sup> Order, the December 10<sup>th</sup> Order, and the June 20<sup>th</sup> Order, LUMA hereby submits the After-Action Reviews and Training Annual Report as *Exhibit 1* to this Motion.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** LUMA's After-Action Reviews and Training Annual Report submitted as *Exhibit 1*, and **deem** LUMA to have complied with the August 16<sup>th</sup>, December 10<sup>th</sup>, and June 20<sup>th</sup> Orders.

**RESPECTFULLY SUBMITTED.**

In Guaynabo, Puerto Rico, this 29<sup>th</sup> day of May 2026.

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 via Alexis Rivera, [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov), and through its counsel of record, Natalia Zayas Godoy, [nzayas@gmlex.net](mailto:nzayas@gmlex.net), Richard Cruz Franqui, [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net), and Mirelis Valle Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net), and counsel for Genera PR LLC, through its counsel Jorge Fernández-Reboredo, [jfernandez@ecija.com](mailto:jfernandez@ecija.com), Gabriela Castrodad García, [gcastrodad@ecija.com](mailto:gcastrodad@ecija.com), and Ernesto Ramos Maldonado, [eramos@ecija.com](mailto:eramos@ecija.com).



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*Exhibit 1*

# **After-Action Reviews and Trainings Annual Report**

NEPR-MI-2019-0006

LUMA Energy

May 29, 2026



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## 1.0 Introduction

Emergency preparedness remains a daily and year-round priority for the men and women of LUMA. Throughout the year, LUMA carries out critical actions to maintain a high level of readiness to respond to hurricanes and other emergencies in accordance with its Emergency Response Plan (ERP). These include maintaining an emergency workforce dedicated to effective emergency response, conducting more than 36,381 hours of Federal Emergency Management Agency (FEMA) training on emergency management best practices, coordinating closely with emergency partners, critical service providers, and mayors to ensure consistent communication regarding preparedness and restoration efforts, and implementing customer notifications and updates to provide timely restoration information when service interruptions occur.

Pursuant to the Resolution and Order (R&O) dated August 16, 2023, issued by the Puerto Rico Energy Bureau (Energy Bureau) in Case No. NEPR-MI-2019-0006, In Re: Emergency Response Plan, LUMA is required to submit, with each annual ERP filing, all After-Action Reviews (AARs) conducted following incidents, as well as tabletop, functional, and full-scale exercises completed since the filing of the previous ERP. Additionally, on December 10, 2024, the Energy Bureau approved LUMA's request to modify the reporting cadence for training activities from quarterly to annual reporting.

In compliance with these directives, this report provides a comprehensive summary of all AARs, along with the training, exercise, and preparedness activities undertaken by LUMA since the last report dated May 30, 2025.

## 2.0 After-Action Review Reports Process

The LUMA Emergency Preparedness Department follows a structured and continuous process to evaluate improvement plans and ensure that lessons learned from emergency responses and exercises are effectively incorporated into the ERP. The process is detailed in section 12.5 After-Action Review of the ERP base plan.

For emergency activations, the AAR report is finalized and approved by the Incident Commander (IC) within two months following demobilization and is subsequently distributed to all relevant stakeholders. A debrief meeting is then conducted to review findings, share key insights, and establish action items strengthening future response efforts.

A similar process is applied to exercise-related AARs, in which improvement plans and recommendations are documented, made available on SharePoint, and shared with the appropriate departments to ensure transparency, accountability, and follow-through. Regular progress reviews enable updates and adjustments to protocols based on implementation status and emerging challenges, supporting a dynamic responsive cycle of continuous improvement.

The next critical step is to revise the ERP to incorporate the new improvements. This includes updating procedures, protocols, and guidelines to reflect on the latest lessons learned. Annually, 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 the annual

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mandated Mock Drill are conducted to identify any further adjustments needed and to ensure the improvements enhance the overall emergency response capabilities.

Ultimately, this process reinforces a culture of continuous improvement within LUMA. By consistently reviewing, updating, and testing the ERP based on exercises, real-world events, and stakeholder feedback, LUMA ensures its emergency response strategies remain strong, adaptive, and resilient. This approach enhances overall preparedness and supports a more effective, coordinated response to future emergencies.

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

The following presents a comprehensive list of action items derived from hotwash sessions and AARs, based on feedback captured by the WebEOC AAR board during LUMA Emergency Operations Center (LEOC) activations conducted from June 1, 2025, until May 30, 2026. Through a structured analysis of findings and recommendations identified during hotwashes and AARs, LUMA has developed a focused and actionable framework to address shortcomings and capitalize on successes. This process is essential for LUMA and the continuous improvement of the ERP. The information, organized table format, ensures that lessons learned translate into future actions, strengthening overall performance, coordination, and operational readiness. Table 1 outlines the key action items derived from these reports and serves as a roadmap for ERP changes and enhancements. The table is organized by activation and includes the suggested Area for Improvement (AFI) and respective recommendations.

During this period, LUMA experienced one significant atmospheric event, which provided a valuable opportunity to focus on lessons learned, process adjustments, and strengthening overall preparedness. This allowed the organization not only to evaluate and improve response procedures based on that event, but also to prioritize training emergency personnel on the LUMA emergency roster in WebEOC, ensuring familiarity with the platform and its various boards used during activations and emergency response.

**Table 1: Activations Findings**

Event	From	Area for Improvement (AFI)	Recommendation
<p><b>TS Erin</b></p> <p><b>August 14, 2025</b></p>	LEOC AAR	Operational Delays	<ol style="list-style-type: none"> <li>1. Increase trained System Ops resources during Outage Event (OEs).</li> <li>2. Establish overnight staffing rotations pre-event.</li> <li>3. Identify other LUMA resources with the potential to be trained to augment the Distribution Operations Center (DOC) / Transmissions Operations Center (TOC).</li> </ol>

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Event	From	Area for Improvement (AFI)	Recommendation
	LEOC AAR	Outage Accountability	<ol style="list-style-type: none"> <li>1. Continue to prioritize Geographic Information System (GIS) digitization of customers, leveraging Low Voltage personnel and the Advanced Metering Infrastructure (AMI) project.</li> <li>2. Segregate prior outages to the hurricane to maintain emergency-related outage accountability while addressing prior outages to hurricane customers.</li> <li>3. Develop guidance that identifies trigger points to disable external links to Outage Management System (OMS).</li> </ol>
	LEOC AAR	Communications	<ol style="list-style-type: none"> <li>1. Maintain Public Information Officer (PIO) or communications personnel in the loop regardless of activation.</li> <li>2. PIO needs to incorporate their Internal Communications Specialists in Human Resources as a remote team using templates already approved in the PIO Standard Operating Guide (SOG).</li> </ol>
	LEOC AAR	Finance and Project Accounting	<ol style="list-style-type: none"> <li>1. Discuss with the Chief Financial Officer (CFO) establishing a capital project account coding during emergencies.</li> <li>2. Train all personnel on project/account coding during emergencies using WebEOC Incident Files.</li> <li>3. Leverage Customer Experience and Key Accounts Specialist for OE</li> </ol>

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Event	From	Area for Improvement (AFI)	Recommendation
			project account notifications to the Call/Contact Center.
	LEOC AAR	Activation	<ol style="list-style-type: none"> <li>1. Update the ERP under the Base Plan Appendix B, Assignment of Responsibility by adding under the Field Operations Branch Director East and West, Safety Officer, and Customer Experience &amp; Key Accounts Specialist, the process and communication expectations detailing activation procedures.</li> <li>2. Execute and practice during Operations-driven Incident Management Team (IMT) activations.</li> </ol>

## 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 conducted from June 1, 2025, until May 31, 2026. This is vital for LUMA and the ERP's continuous improvement.

Table 2: Training and Exercises Findings

Exercise	From	Area for Improvement (AFI)	Recommendation
<b>Aviation Functional Exercise using WebEOC tailored board</b>  <b>August 8, 2025</b>	AAR	The use of dashboards to track significant activities and resource commitments, integrating data from other systems, and aligning workflows to business processes.	<ul style="list-style-type: none"> <li>• Be strategic with the information requested and filled. It should be relevant to the Incident Commander for decision-making.</li> <li>• Dashboards created must respond to findings with Subject Matter Expert (SMEs).</li> </ul>

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Exercise	From	Area for Improvement (AFI)	Recommendation
<b>ROCC_LEOC Contract Functional Exercise</b>  <b>August 29, 2025</b>	AAR	Improve clarity regarding roles, responsibilities, and processes for Regional Operation Command Centers (ROCCs) personnel responsible for contract requests.	<ul style="list-style-type: none"> <li>• Develop a clear, accessible section within Appendix B on ERP to describe the ROCCs' roles, and responsibilities.</li> </ul>
	AAR	Ensure that all personnel are familiar with their role.	<ul style="list-style-type: none"> <li>• The ROCC leadership and Emergency Preparedness Department should revise the ERP, incorporating the necessary changes.</li> </ul>
	AAR	Enhance the ability to access and share real-time information across all departments.	<ul style="list-style-type: none"> <li>• Develop and enforce data-sharing protocols for timely dissemination of critical information.</li> </ul>
<b>2026 Mock Drill</b>  <b>February 27, 2026</b>	AAR	<ul style="list-style-type: none"> <li>• Opportunities to strengthen integration between response and recovery planning.</li> <li>• Need to enhance real-time adaptability to evolving conditions.</li> </ul>	<ul style="list-style-type: none"> <li>• Streamline additional human resources requests and escalation procedures.</li> <li>• Improve cross-functional communication.</li> </ul>
		No contingency planning for unavailability of pre-positioned vendor equipment.	<ul style="list-style-type: none"> <li>• Include injects simulating vendor unavailability.</li> </ul>
	AAR	Limited pre-event familiarization of circuits (transmission lines and distribution feeders) by contractor crews.	<ul style="list-style-type: none"> <li>• Incorporate pre-impact circuit patrols for contractors to improve post-event efficiency.</li> </ul>
	AAR	No discussion of contingency plans for flood-prone substations; only discussion of operations Transmission and Operations (T&O) sites (técnica) for relocation.	<ul style="list-style-type: none"> <li>• Develop and integrate alternate operating strategies for vulnerable substations into planning and exercises.</li> </ul>

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Exercise	From	Area for Improvement (AFI)	Recommendation
	AAR	<ul style="list-style-type: none"> <li>The Life Preservation Equipment Customers procedure was discussed but lacked full demonstration of end-to-end coordination with municipal officials.</li> <li>Customer communication strategies require enhancement.</li> </ul>	<ul style="list-style-type: none"> <li>Strengthen execution and documentation of Life Preservation Equipment customer procedures, including municipal coordination.</li> </ul>

## 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. The training plan was updated this year to specifically include the subject of the training, description of the training audience, delivery method, time frame, and frequency of the training.

### 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's best practices and new perspectives

### 3) Collective Training:

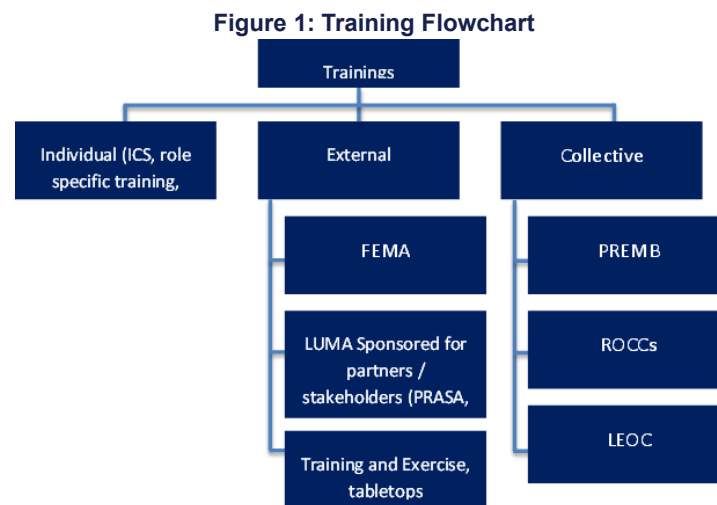
- Concentrates on improving teamwork, communication, and coordination among team members
- Often involves group exercises, simulations, or team-building activities

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- 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, 2026, Section 11.4 of the 2026 ERP).



The Emergency Preparedness Department continuously evaluates training needs by reviewing AARs, incorporating recommendations, and following best practices. The Policy and Procedure Emergency Preparedness Trainings document reviewed and published on November 1, 2025, along with the Emergency Response Plan, addresses training requirements based on identified threats, hazards, risks, and preparedness priorities.

## 3.1 Individual Training

FEMA training was suspended from February 14, 2026, until April 15, 2026, by Department of Homeland Security due to a lapse in Federal Funding. As of March 30, 2026, Incident Command System (ICS) training completion based on LUMA Policy, *Policy and Procedure Emergency Preparedness Trainings*, dated November 1, 2025, is

36,381 hours. These courses are designed to provide essential training, equipping personnel with the skills necessary to effectively execute emergency management functions.

- June 2025 – Damage Assessment training at Palo Seco was conducted using the application of Survey 123 for 182 internal damage assessors who would be assigned to the ROCCs.
- January 2026 – Three external evaluators, representing government, utility industry, and regulatory expertise, completed Evaluator training. This training focused on enhancing the evaluation skills needed to assess emergency response actions and procedures. This was offered in preparation for the 2026 Mock Drill conducted on February 27, 2026.

## 3.2 External Training

PREPA coordinated a series of training sessions sponsored by FEMA taught by Texas A&M Engineering Extension Service (TEEX) University. The courses of MGT-343: Disaster Management for Water and

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Wastewater Utilities, programmed for the 18 and 19 of March 2026 and MGT-345: Disaster Management for Electric Power Systems programmed for 8 and 9 of April 2026, and MGT-317: Disaster Management for Public Works and Public Services, programmed for the 13 and 14 of May 2026 were postponed due to a lapse in Federal Funding for FEMA within the Department of Homeland Security (DHS), but will be rescheduled. PREPA has provided several seats for LUMA and Genera to participate in all the courses to promote emergency management skills training.

### 3.3 Collective Training

#### CMC

- April 16, 2026 – Pre-Event functional exercise was conducted with the notification, using the enterprise Genesys application, to the Crisis Management Committee (CMC) to simulate H-120 task in Appendix B: H-136 Timeline of Annex D – Severe Weather Response. In addition to the CMC members, the National Oceanic and Atmospheric Administration (NOAA) and National Weather Service (NWS) leadership participated in providing real-time weather information using Hurricane Erin data.

#### Systems Operations

- A tabletop exercise of the Supervisory Control and Data Acquisition (SCADA) contingency plan was first conducted on June 11, 2025, to review data and discuss alternate procedures should the primary system fail. This was followed by a functional exercise on October 13, 2025, to assess and validate the refinements made following the initial tabletop exercise. The SCADA functional exercise included deploying substation personnel to the Acacia and Dorado substations to manually capture the data that SCADA normally provides.
- April 8, 2026 – Implementation of Energy Management System (EMS), as part of our efforts to strengthen the reliability and modernization of Puerto Rico's electric system with a follow-on EMS operational test running the application from its alternate location in Luchetti, Santurce.
- April 24, 2026 – Very High Frequency (VHF) testing conducted between Genera and private generation sites with the LUMA TOC ensuring continued reliability and operational readiness across all critical communication channels.
- In addition to the already mentioned SCADA and VHF functional exercises, an Energy Management System operational test was performed from the alternate location in Santurce Complex on May 4, 2026.

#### WebEOC

Technology can be challenging, which is why we have developed a progressive training approach, that starts with a theoretical overview and system demonstration, followed by hands-on, in-person training sessions that prepare team members to use the system aligned with their LEOC-specific roles. Forty (40) **WebEOC** training sessions were facilitated. These trainings were in person, offered in English or Spanish, for employees on the LUMA Emergency Roster (LER) to strengthen operational readiness and system proficiency across response teams. In addition, a separate Train-the-Trainer program was implemented to develop internal instructors to support and reinforce training delivery at the ROCCs. These trained personnel assisted with facilitating sessions at various locations across the island, helping to expand

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reach, improve accessibility for ROCC employees, and ensure consistent knowledge transfer while reducing logistical barriers. Every training was followed by a knowledge assessment to certify understanding.

### Specialized WebEOC Boards

- **Logistics Service Request Board** functional exercises with LUMA's ROCCs are designed to reinforce understanding of the Logistics Service Request Board and its practical application. The exercises focused on translating training concepts into real-world operational use, allowing participants to practice submitting, managing, and tracking service requests in a controlled environment. These drills strengthened user proficiency, validated workflow processes, and improved overall readiness for efficient coordination during emergency and operational scenarios.
- Developed and delivered the **Safety Event Report Board** training via Workday- as part of a structured workload for Safety Officers and Safety Assistants assigned to the LEOC and ROCCs within the LUMA Emergency Roster. This training focused on strengthening users' ability to accurately document, track, and manage safety events within the reporting system, ensuring consistency, clarity, and compliance with established protocols. The digital format included a review of the basic WebEOC functions and ensured compliance.

### Mock Drill

- February 27, 2026 – 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 that the Emergency Mock Drill must take place three (3) months prior to the commencement of the Atlantic Hurricane Season.

### LEOC Activation

- May 20, 2026 – Functional exercise conducted for LUMA's new CEO/President using the February 27, 2026, Mock Drill tabletop scenarios covering all five ERP stages: Pre-Event, Emergency, Initial Response, Restoration, and Demobilization.

### Emergency Preparedness 365

- The Emergency Preparedness 365 Campaign continues to promote collaboration and shared responsibility. It includes recurring emails or bulletins with tips and references for further information on emergency preparedness.