

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

NEPR

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CASE NO.: NEPR-MI-2019-0007

IN RE: THE PERFORMANCE OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

SUBJECT: LUMA's Motion Submitting the
Quarterly Report on System Data for April
through June 2026 and Renewed Request for
Partial Reconsideration of April 2, 2026,
Order

**MOTION SUBMITTING THE QUARTERLY REPORT ON SYSTEM DATA
FOR APRIL THROUGH JUNE 2026 AND RENEWED REQUEST FOR PARTIAL
RECONSIDERATION**

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

1. The obligation to submit quarterly reports containing specified system data of the Puerto Rico Electric Power Authority ("PREPA") is established by the *Resolution and Order* issued on May 14, 2019, by the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau") in this proceeding. Said *Resolution and Order* require the periodic submission of certain system data related to PREPA's electric system as part of the Energy Bureau's ongoing regulatory oversight.

2. In accordance with Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("T&D OMA"),¹ LUMA, in its capacity as agent

¹ LUMA Energy, LLC, LUMA Energy ServCo, LLC, the Puerto Rico Electric Power Authority and the Puerto Rico Public-Private Partnerships Authority, *Transmission and Distribution System Operation and Management Agreement* between (June 22, 2020); *Puerto Rico Transmission and Distribution System Operation and Maintenance Supplemental Terms Agreement* (June 22, 2020)(together herein referred to as the "T&D OMA") <https://docs.pr.gov/files/P3-PublicaPrivadas/Projects/Projects/TD%20-%20LUMA/OM%20Agreement/executed-consolidated-om-agreement-td.pdf>

for PREPA, is responsible for submitting system data pertaining to the Puerto Rico transmission and distribution system (the “T&D System,” as defined in the T&D OMA).

3. Consistent with the foregoing requirements, LUMA respectfully herein submits the Quarterly Report on System Data corresponding to the period of April through June 2026.

II. Relevant Procedural Background

4. On May 14, 2019, the Energy Bureau issued a *Resolution and Order* initiating this proceeding to establish quarterly reporting requirements for electric system performance metrics. Said Order directed the submission of performance data using a standardized reporting template.

5. On June 1, 2021, LUMA assumed responsibility for the operation and maintenance of the T&D System. Since that date, LUMA has filed system data reflecting quarterly performance reports in this docket using the reporting templates and methodologies ordered by the Energy Bureau through successive resolutions and orders. Submission of the performance metrics is due no later than the 20th day of the month immediately following the quarter being reported.

6. Between 2021 and 2025, the Energy Bureau issued multiple resolutions and orders modifying the quarterly reporting template and associated reporting obligations, including orders issued on May 21, 2021; April 3, 2023; January 19, 2024; October 18, 2024; and January 17, 2025. These orders required LUMA to adjust reported metrics, align certain methodologies, provide historical and supporting data, and submit responses to requirements of information which LUMA answered through various compliance motions filed in this docket.

7. On April 2, 2026, the Energy Bureau issued and notified a *Resolution and Order* titled Updated Data Template for Quarterly Reporting (the “April 2 Order”), in which it directed the revision of the quarterly reporting template and ordered LUMA to begin reporting additional system reliability metrics that had not previously been required of LUMA in this docket.

8. The April 2 Order directs LUMA to begin reporting the following new reliability metrics: Unit generation shortfall load shed events; Unit performance load shed events; Monthly SAIDI (Generation) – System; Monthly SAIFI (Generation) – System; Monthly SAIDI (T&D Unnormalized) – System; Monthly SAIFI (T&D Unnormalized) – System; Monthly SAIDI (T&D All-in) – System; and Monthly SAIFI (T&D All-in) – System. The April 2 Order further orders LUMA to report values for the newly added reliability metrics for the months covered in the applicable quarterly submission and for prior months within Fiscal Year 2026, notwithstanding the fact that those metrics were not previously required, defined, or reported by LUMA in this proceeding.

9. In addition, the April 2 Order directs LUMA to populate the “Methodology” tab in the updated reporting template for each newly added metric, including descriptions of data sources, calculations, and key assumptions. Also, the Energy Bureau ordered LUMA to review the “Definitions” tab and confirm the definitions’ accuracy in both English and Spanish.

10. On April 22, 2026, LUMA submitted a *Motion Requesting Partial Reconsideration of the April 2 Order* (the “April 22 Reconsideration”). In that motion, LUMA requested reconsideration of the April 2 Order to the extent it required LUMA to report the following six new monthly reliability metrics: Monthly SAIDI (Generation) – System; Monthly SAIFI (Generation) – System; Monthly SAIDI (T&D Unnormalized) – System; Monthly SAIFI (T&D Unnormalized) – System; Monthly SAIDI (T&D All-in) – System; and Monthly SAIFI (T&D All-in) – System (the “Reconsideration Metrics”). April 22 Reconsideration, ¶ 24 at p. 9. LUMA argued that these metrics were adopted outside the procedures established by *Regulation for Performance Incentive Mechanisms*, which governs the creation and modification of performance metrics. *Id.* ¶¶ 25-31 at 9-11. LUMA further stated that several of the metrics presented technical

and methodological challenges that could affect the reliability and accuracy of the reported data. *Id.* ¶ 31 at 11.

11. Also on April 22, 2026, LUMA submitted a *Motion Submitting the Quarterly Report on System Data for January through March 2026* (the “April 22 Submission”). Through that filing, LUMA submitted its Quarterly Report on System Data for January through March 2026 and proposed revisions to the reporting template’s Definitions tab. *See* April 22 Submission, Exhibits 1 and 2. LUMA advised that it was partially complying with the April 2 Order by reporting the Unit Generation Shortfall Load Shed Events and Unit Performance Load Shed Events metrics, but did not report the Reconsideration Metrics for the reasons set forth in the April 22 Reconsideration, which it incorporated by reference. *Id.* ¶¶ 11-13 at p. 3-4. The reported metrics were submitted using the revised template required by the Energy Bureau in the April 2 Order. *Id.* ¶ 11, pp. 3-4. These metrics’ descriptions, data sources and calculations were also included in the “Methodology” tab. *Id.*

12. In the April 22 Submission, LUMA added that reporting the Unit Generation Shortfall Load Shed Events and Unit Performance Load Shed Events should not be construed as an acceptance that new performance metrics may be imposed absent compliance with the procedures established in Regulation No. 9137, which governs the process for establishing performance metrics for reporting purposes, including metrics subject to targets and those tied to financial incentives. LUMA further submitted that those additional metrics identified in the April 2 Order, including the pair of metrics reported in the April 22 Submission, do not reflect LUMA’s performance, as generation performance is the sole responsibility of individual generators and not LUMA’s.

III. Submission of System Data from April through June 2026

13. Through this motion, LUMA submits system data for the period of April through June 2026. This submission consists of the Quarterly Report on System Data, an Excel spreadsheet with the title “*Resumen Métricas Master_July2026.xlsx*” herein submitted as Exhibit 1.

14. As part of this filing, LUMA is partially complying with the April 2 Order by reporting the following metrics: (1) *Unit Generation Shortfall Load Shed Events* and (2) *Unit Performance Load Shed Events*. See Exhibit 1, T&D tab, rows 248 and 249. These metrics have been prepared and reported using the revised template required by the Energy Bureau in the April 2 Order. These metrics’ descriptions, data sources and calculations were also included in the “Methodology” tab.

15. LUMA respectfully submits that the Reconsideration Metrics and their respective definitions and methodologies required by the April 2 Order are not included with this filing for the reasons set forth in the April 22 Reconsideration, which are incorporated herein by reference.

16. LUMA further submits that the reporting of any metric that has not been approved through the procedures established in Regulation No. 9137 shall not be construed as acceptance that new performance metrics, performance incentive mechanisms, or penalty mechanisms may be imposed absent compliance with the requirements of that regulation. LUMA further submits that, to the extent any reported metric measures matters that fall outside the scope of LUMA’s Scope of Services (as defined in the T&D OMA), including generation unit performance, such metric does not reflect LUMA’s performance and therefore cannot serve as the basis for the imposition of any performance incentive, penalty, or other performance based consequence on LUMA.

IV. Submission of Restated Metrics

17. In this submission, LUMA includes restated values for the Operational expenses vs. budget (FYTD) metric for Fiscal Year 2023. *See* Exhibit 1, Tab T&D, line 22. The Title III interim cost of \$3.2 million increased the FY2023 budget from \$549.7 million to \$552.9 million. However, this correction was inadvertently left out of the calculation of this metric. LUMA has corrected this issue and included in this filing the restated values for Fiscal Year 2023, that is July 2022 to June 2023.

18. In addition, LUMA is restating the values for the Call Abandonment Rate (FYTD) and Average Speed of Answer (FYTD) metrics from July 2021 through March 2026. *See id.* lines 259-260. An internal review found that a simple average had been used to calculate the values reported for each period across both metrics. Adjustments have since been made to ensure the calculations more accurately reflect each reporting period without relying on simple averaging. While the underlying data of either metric is not changing, these corrections improve the precision of the results and their alignment with the methodologies outlined in the Methodology tab of this report. Furthermore, because Average Speed of Answer (FYTD) is defined as total waiting time for answered calls divided by total answered calls, it must weigh each day's Average Speed of Answer by its number of answered calls.

V. Submission of Quarterly Workpapers

19. On December 19, 2025, the Energy Bureau entered a *Resolution and Order* (the "December 19 Order") directing LUMA to submit supporting data workpapers for the values reported in each quarterly and annual submission. Pursuant to that directive, and with respect to those metrics for which the Energy Bureau required quarterly supporting data workpapers, LUMA submits such workpapers as Exhibit 2 to this Motion.

20. The December 19 Order further directs LUMA to submit the workpapers supporting the annual values reported for the Inspections FYTD metrics (Distribution and Transmission lines and T&D Substations), OSHA FYTD metrics (DART Rate, Severity Rate, Fatalities, and Recordable Incident Rate) and Overtime FYTD metric. LUMA respectfully informs the Energy Bureau that the final annual values for these metrics are determined and reported in the quarterly reporting cycle immediately following the close of the fiscal year because certain underlying financial information and other year-end adjustments are not available at fiscal year-end. Consistent with this reporting methodology, LUMA will submit the corresponding annual supporting workpapers with its October Quarterly Report on System Data, when the finalized fiscal year values are reported.

VI. Conclusion

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice** of the aforementioned; **accept** the Quarterly Report on System Data for April through June 2026 and **issue** a ruling on LUMA's April 22 Reconsideration.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 20th day of July 2026.

[Signature page follows]



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CERTIFICATE OF SERVICE

I hereby certify that I filed this motion with the Clerk of the Energy Bureau using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to

Puerto Rico Electric Power Authority, through:

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In Guaynabo, Puerto Rico, on the 20th day of July 2026.

/s/. Katuska Bolaños-Lugo
Katuska Bolaños-Lugo

Exhibit 1

System Data for April through June 2026

[Files to be submitted via email in Excel format]

Exhibit 2

Quarterly Data Values Workpapers

[Files to be submitted via email in Excel format]