

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

NEPR

Received:

Sep 22, 2026

2:39 PM

CASE NO.: NEPR-MI-2019-0007

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

SUBJECT: Motion Submitting Response to
the Requests of Information issued in the
Resolution and Order of September 8, 2026

**MOTION SUBMITTING RESPONSE TO THE REQUESTS OF INFORMATION
ISSUED IN THE RESOLUTION AND ORDER OF SEPTEMBER 8, 2026**

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:

1. Pursuant to its obligation to submit quarterly reports containing specified system data of the Puerto Rico Electric Power Authority, as established by the *Resolution and Order* issued on May 14, 2019 by the Puerto Rico Energy Bureau (the “Energy Bureau”) in this proceeding, and in accordance with Section 5.6 of the Puerto Rico Transmission and Distribution System Operating and Maintenance Agreement,¹ LUMA, in its capacity as agent for PREPA, submitted four quarterly reports for Fiscal Year 2025 (collectively, the “FY2025 Quarterly Reports”).²

2. On September 8, 2026, the Energy Bureau issued a Resolution and Order (the “September 8 Order”), in which it stated that it had reviewed the FY2025 Quarterly Reports and

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”).

² See *Motion Submitting Quarterly Report on System Data for July through September 2024 and in Compliance with order of October 18, 2024*, filed on November 20, 2024; *Motion Submitting Quarterly Report on System Data for October Through December 2024*, filed on January 21, 2025; *Motion Submitting Quarterly Report on System Data for January Through March 2025*, filed on April 21, 2025; and *Motion Submitting Quarterly Report on System Data for April through June 2025*, filed on July 21, 2025.

found that it required additional information to evaluate LUMA's performance during Fiscal Year 2025. Accordingly, the Energy Bureau ordered LUMA to respond, within ten (10) business days, to certain Requirements of Information ("ROIs") set forth in Attachment A of the September 8 Order.

3. In compliance with the September 8 Order, LUMA hereby submits, as **Exhibit 1**, LUMA's responses to the ROIs set forth in Attachment A of the September 8 Order. LUMA respectfully represents that it is not in a position to provide complete responses to ROI #1 and ROI #3 due to data limitations previously identified in Annex A of the *Motion Requesting Partial Reconsideration of the April 2 Order*, filed in this proceeding on April 22, 2026.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; **accept Exhibit 1** and **Exhibit 2** as LUMA's responses to the ROIs set forth in Attachment A of the September 8 Order; and **deem** LUMA in compliance with the September 8 Order.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 22nd day of September 2026.



DLA Piper (Puerto Rico) LLC
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/s/ Katuska Bolaños Lugo
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September 2026, I filed the foregoing motion with the Clerk of the Puerto Rico Energy Bureau through the Energy Bureau's electronic filing system. Respectfully submitted. I further certify that on the same date I served a true and correct copy of the foregoing filing upon all parties of record in this proceeding via the Energy Bureau's electronic filing system, in accordance with the applicable rules and regulations, including:

The Puerto Rico Electric Power Authority, through:

rcruzfranqui@gmlex.net

nzayaz@gmlex.net

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Genera PR LLC, through:

jfr@ecija.com

emaldonado@ecija.com

jdiaz@ecija.com

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regulatory@genera-pr.com

Independent Consumer Protection Office, through:

hrivera@jrsp.pr.gov

In Guaynabo, Puerto Rico, on the 22nd day of September 2026.

/s Katuska Bolaños Lugo

Katuska Bolaños Lugo

Exhibit 1

LUMA's responses to the ROIs set forth in Attachment A of the September 8 Order

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20260908-PREB-Attachment A-1

REQUEST

- 1) How many Major Event Days (MEDs) (i.e., days that exceeded the TMED using the IEEE Beta Method) occurred in FY2025? For every MED, please provide:
- The date (month, day, year).
 - The cause and description of the event.
 - The number of customers interrupted.
 - The number of customer minutes interrupted.
 - The SAIDI impact (i.e., the change in SAIDI resulting from excluding the MED).

RESPONSE

A total of 19 Major Event Days (MEDs) were identified during FY2025. Refer to table below and Exhibit 2 for response to a through e.

Date	# MEDs	Cause & Description of Event	Customers Interrupted (CI)	Customer Minutes Interrupted (CMI)	SAIDI Impact (minutes)
8/14/2024 to 8/28/2024	15 ¹	This period is considered an MED due to the Tropical Storm Ernesto affecting Puerto Rico. The period covers the LEOC activation as part of the storm-response efforts.	N/A ²	N/A ²	N/A ²
9/2/2024	1	Refer to Exhibit 2, tab labeled 09-02-24	76,807	31,480,349	21.44
9/3/2024	1	Refer to Exhibit 2, tab labeled 09-03-24	160,529	43,734,594	29.79
12/31/2024	1	Refer to Exhibit 2, tab labeled 12-31-24. MED related to a major load-shedding event.	1,490,035	1,486,353,141	1,012.35
4/16/2025	1	Refer to Exhibit 2, tab labeled 4-16-25. MED related to a major load-shedding event.	1,519,390	1,728,102,827	1,177.00
Total MEDs	19				

¹ Value rounded, on 8/28/2024 event ended at 14:50 hours.

² Unavailable because in cases such as Tropical Storm Ernesto, where a MED coincides with a Catastrophic Event, data cannot be granularly segmented. Please refer to LUMA's Motion Requesting Partial Reconsideration of the April 2 Order and its Annex A.

RESPONSES TO SEPTEMBER 8, REQUEST OF INFORMATION

A MED is a day in which the SAIDI value exceeds a threshold value. Multiple events and their cause can be observed during an MED, therefore, not always one event within the T&D system can be attributed as the only cause of the day classified as a MED. This explains why there are multiple causes (see Exhibit 2) for the MEDs listed above, except for the event related to the Tropical Storm Ernesto.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20260908-PREB-Attachment A-2

REQUEST

- 2) Are the transmission line, distribution line, and substation inspection data and results reported for FY2022, FY2023, FY2024, and FY2025 directly comparable across years? If so, explain the basis for that conclusion. If not, identify each methodological, definitional, procedural, technological, sampling, or reporting change that affects comparability and quantify, to the extent possible, its effect on the reported results.

RESPONSE

Yes. The transmission line, distribution line, and substation inspection data and results reported between FY2022 and FY2025 are directly comparable across years. There were no changes to the definitions or methodologies used to calculate these metrics.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20260908-PREB-Attachment A-3

REQUEST

- 3) Provide FY2022 through FY2025 system SAIDI and SAIFI calculated on a consistent methodological basis, both before and after all exclusions, adjustments, normalization procedures, Major Event Day treatment, extraordinary-event adjustments, or other modifications. Identify and explain every change in methodology from one fiscal year to another and provide the results that would have been obtained if the same methodology had been applied consistently throughout the entire multi-year period.

RESPONSE

For FY2022 to present, system SAIDI and SAIFI have been calculated and reported under this docket following the IEEE Standard 1366 guidelines.

On the table below, LUMA provides these 'reported' SAIDI T&D and SAIFI T&D system level values. The 'PREB request' values for SAIDI T&D and SAIFI T&D include MEDs (not overlapping with catastrophic events) and Planned Interruptions, these continue to exclude Momentary Interruptions, Catastrophic events and generation-related events.

As outlined on LUMA's response to RFI-LUMA-MI-2019-0007-20250516-PREB-Attachment A-5³, the IEEE Standard 1366 focuses on the Transmission and Distribution performance of the electric grid while it excludes generation-related events. Reporting reliability data related to these events falls outside LUMA's responsibilities; thus, these events are excluded. In addition, catastrophic events are events, such as major storms, which can also be classified as an MED, making it difficult to categorize outages that are due to a fault or outage in the T&D side of the grid or in the generation assets, moreover if it is shifted during the interruption. As result, events such as Hurricane Fiona and Tropical Storm Ernesto have been excluded. As previously explained, LUMA does not have the system capability to properly track momentary interruptions data, and these remain excluded (refer to RFI-LUMA-MI-2019-0007-20250516-PREB-Attachment A-3³).

³ June 5, 2025, Motion in Compliance with Resolution and Order of May 16, 2025.

RESPONSES TO SEPTEMBER 8, REQUEST OF INFORMATION

Fiscal Year	SAIDI T&D		SAIFI T&D	
	Reported ⁴	PREB Request ^{5,6}	Reported ⁴	PREB Request ^{5,6}
FY2022	1,564	3,939	7.52	9.77
FY2023	1,218	1,627	6.98	8.15
FY2024	1,432	2,389	7.92	10.55
FY2025	1,580	4,246	8.02	11.26

⁴ Reported under NEPR-MI-2019-0007 Quarterly Report on System Data. Values calculated as per IEEE Standard 1366-2012, include exclusions.

⁵ This calculation includes MEDs and planned interruptions. Note that the resulting value is inconsistent with the guidelines established in IEEE Standard 1366-2012. Please refer to LUMA's Motion Requesting Partial Reconsideration of the April 2 Order and its Annex A.

⁶ Events that are typically excluded following the IEEE Standard 1366 do not undergo the same quality revision and overlapping events, duplicity, and other errors might be present. These 'PREB request' values should only be considered as estimations. Please refer to LUMA's Motion Requesting Partial Reconsideration of the April 2 Order and its Annex A.

Performance Metrics Quarterly Report

Docket Number: NEPR-MI-2019-0007

Response: ROI-LUMA-MI-2019-0007-20260908-PREB-Attachment A-4

REQUEST

- 4) Please explain how transmission line, distribution line, and substation inspection activities correspond to reliability performance, including SAIDI and SAIFI. Identify whether any change in inspection methodology, scope, frequency, classification, data collection, or reporting between FY2022 and FY2025 affects LUMA's ability to correlate inspection activities with reliability performance, including SAIDI and SAIFI. Explain how LUMA has controlled for those differences in any year-over-year comparison presented to the Energy Bureau.

RESPONSE

Transmission line, distribution line, and substation inspections are essential assessment activities that help LUMA identify system needs and prioritize maintenance and capital work. While inspections contribute valuable assets' condition information, they represent only a subset of the total efforts required to operate, maintain, and modernize the electric grid. In other words, the complete scope of operational work (including but not limited to preventative maintenance, corrective repairs, vegetation management, system configuration, capital improvements, and emergency response) drives reliability outcomes, but inspection counts alone does not directly correlate to SAIDI or SAIFI performance. LUMA cautions against interpreting inspection metrics as a representation of all reliability-related work, as significantly more activity is performed beyond inspections to support system performance. LUMA's inspection methodologies remained consistent between FY2022 and FY2025.

Exhibit 2

FY2025 MEDs

[Excel spreadsheet, to be submitted via email]