



Monthly Report on the T&D System

For the Month of December 2023

January 17, 2024

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1.0 Mission, Goals and Areas of Responsibility

LUMA assumed operations of Puerto Rico's Transmission and Distribution System ("T&D System") on June 1, 2021, with the mission to recover and transform the energy grid and deliver customer-centric, reliable, resilient, safe and sustainable electricity at reasonable prices for the 1.5 million customers LUMA is proud to serve. LUMA manages and operates the government-owned T&D Assets under the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement ("T&D OMA") executed on June 22, 2020, among the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, "LUMA").

This report outlines LUMA's key activities for the month of December 2023.

2.0 Monthly Sales Summary

- December consumption (GWh) was 2.2% lower than the previous month (November) and 5.7% higher than the same month of the previous year (December 2022). The load is still being affected by the high temperatures that have been experienced since May 2023 compared with last year same months. Energy sales (\$) in December decreased by 23.6% from December 2022 and 9.2% from November 2023.
- The main driver of the decrease from November 2023 and December 2022 was a lower fuel charge to recover the cost of fuel used in energy production. Although November and December 2023 Cooling Degree Days (CDD) were higher than the same months from 2022, the difference between the prior months was less than what was seen in earlier months of 2023 compared to 2022.

Table 2-1. Energy billed by customer segment

Consumption (GWh)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2023 December	536.9	651.6	138.2	26.1	2.5	3.4	1,358.7
2023 November	569.0	656.4	133.5	26.0	1.7	3.1	1,389.7
2022 December	505.6	606.4	143.5	25.3	1.7	3.2	1,285.6

Table 2-2. Energy sales by customer segment

Sales (\$ Million)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2023 December	98.1	128.7	26.5	8.0	0.5	0.6	262.4
2023 November	111.3	141.1	27.0	8.6	0.4	0.6	289.0
2022 December	130.2	164.1	38.0	9.9	0.5	0.8	343.5

Table 2-3. Energy sales by rate component

Energy Sales (\$ Million)	Base	FCA ¹	PPCA ²	CILT & Subsidies ³	Total ⁴
2023 December	90.9	102.6	36.5	32.4	262.4
2023 November	95.2	127.4	35.0	31.4	289.0
2022 December	83.0	192.1	44.1	24.3	343.5

3.0 System Operations Update

Reported Events

- Several generation forced outages occurred during the month. Seven (7) resulted in automatic underfrequency loadsheds.
- Several significant transmission outages occurred during the month.
- No emergency events occurred during the month of December.
- On December 26, a transformer trip in Sabana Llana caused the electric system in the north-east of the island to be in a precarious condition although no service interruptions were caused by this event. The crew responded and the transformer was put back in service the same day.

Table 3-1: Significant Generation Outages

Date	Generation Outages
12/06/23	Costa Sur 6: Derated
12/07/23	Aguirre 2: Derated
12/09/23	Aguirre 2: Derated San Juan 5: Planned Outage
12/10/23	Aguirre 2: Derated San Juan FEMA (All Units): Planned Outage
12/13/23	Aguirre 2: Derated
12/15/23	Aguirre 2: Forced Outage and Loadshed
12/16/23	AES 1 & AES 2: Forced Outage and Loadshed
12/17/23	Costa Sur 6: Derated AES 2: Forced Outage and Loadshed
12/18/23	AES 2: Forced Outage and Loadshed
12/19/23	AES 1: Derated Aguirre 2: Forced Outage and Loadshed
12/20/23	AES 1: Derated Aguirre 2: Derated
12/22/23	AES 1: Derated Aguirre 2: Derated
12/23/23	San Juan 9: Derated Aguirre 2: Forced Outage and Loadshed
12/24/23	AES 1: Derated

¹ FCA: Fuel Charge Adjustment

² PPCA: Purchased Power Charge Adjustment

³ CILT: Contribution In Lieu of Taxes

⁴ The Total amount may not equal the sum of numbers for each category due to rounding.

Date	Generation Outages
12/25/23	Aguirre 2: Forced Outage San Juan 6: Forced Outage San Juan 7: Forced Outage AES 2: Forced Outage and Loadshed
12/26/23	San Juan 5: Derated
12/27/23	San Juan 7: Forced Outage
12/28/23	San Juan 5: Derated San Juan 6: Derated San Juan 7: Derated
12/29/23	San Juan 5: Derated Aguirre 2: Derated
12/30/23	San Juan 5: Derated San Juan 6: Derated Aguirre 2: Derated
12/31/23	Aguirre 2: Forced Outage AES 2: Forced Outage

Table 3-2: Significant Transmission Outages

Date	Transmission Outages
12/01/23	Substation La Parguera Tripped
12/02/23	Line 37800 Tripped
12/04/23	Line 37400 Tripped
12/11/23	Line 39000 Tripped
12/12/23	Line 36400 Tripped
12/13/23	Line 36400 Tripped Line 36800 Tripped Line 36300 Tripped
12/14/23	Hato Rey Substation Tripped Martin Pena Substation Tripped Line 38800 Tripped
12/15/23	Line 36100 Tripped
12/20/23	Line 36100 Tripped
12/22/23	Line 36100 Tripped Levittown Substation Tripped
12/26/23	Transformer Bank 1 Sabana Llana Tripped

4.0 Puerto Rico Energy Bureau Filings & Hearings

LUMA participated in and supported discussions with the Puerto Rico Energy Bureau (“PREB”) across a broad range of topics during the month.

- [NEPR-MI-2019-0007](#) | **Legacy Performance Metrics** – On December 21, the PREB issued a Resolution and Order (“R&O”) in which it analyzed LUMA and PREPA’s performance over Fiscal

Year (“FY”) 2023 and indicated how both performed relative to the FY2020 baseline values and FY2022 performance. The PREB required LUMA to explain causes and provide improvement plans for metrics labeled as “Not Improved” and requested additional information for other metrics to determine LUMA’s performance improvement. Additionally, the PREB approved the use of LUMA’s operational districts for reporting reliability metrics and included additional questions on reliability performance.

- [NEPR-MI-2022-0001](#) | **Energy Efficiency (“EE”) and Demand Response (“DR”)** –On December 20, LUMA submitted the Revised Transition Period Plan and other information related to the EE and DR programs in response to PREB’s R&O of November 29.
- [NEPR-MI-2021-0002](#) | **Federal Funding** –On December 7, LUMA filed a motion to provide the status of LUMA’s due diligence to allow the Genera Battery Energy Storage System (“BESS”) Projects to interconnect. On December 11, LUMA submitted its response to the November 29 Request for Information (“RFI”) regarding site inspections. On December 14, LUMA submitted one FEMA Project Obligation for the Advance Metering Infrastructure (“AMI”) Improvement Program and the updated 90-Day Plan. On December 21, LUMA informed the PREB of a change in scope for the Monacillos Transmission Center federally funded project. On December 27, LUMA submitted three FEMA Project Obligations under the Substation Rebuilds Improvement Program. On December 28, LUMA filed a motion to inform the PREB of the consolidation of six federally funded substation projects.
- [NEPR-MI-2019-0006](#) | **Emergency Response Plan (“ERP”)** – On December 15, LUMA submitted its responses to PREB’s Request for Information (“RFI”) regarding the ERP and requested modifications to operational activities.
- [NEPR-MI-2023-0001](#) | **Wheeling Implementation** – On December 28, LUMA submitted a motion regarding the updated costs of implementing wheeling, proposed charges for Retail Electricity Suppliers, and responses to the stakeholders’ feedback on the updated Wheeling Services Agreement (“WSA”). Also, LUMA requested that PREB schedule a technical conference to discuss the implementation proposal and expected costs and to address other pending items on the WSA.
- [NEPR-AP-2023-0004](#) | **Integrated Resource Plan (“IRP”) Review Proceeding**– On December 12, LUMA submitted a Motion to submit the final version of the Resource Adequacy Study as part of this docket. The draft study was previously filed on October 25. On December 20, the PREB issued an R&O approving LUMA’s request to modify the timeline for the 2024 IRP filing to June 28, 2024. In addition, the PREB accepted LUMA’s proposal to use a “heat map” visual information based on the present value of revenue requirements to discern the differences across portfolios. The PREB also scheduled a third IRP prefiling technical conference for January 30, 2024, to discuss key elements of the IRP Regulation 9021.
- [NEPR-MI-2022-0003](#) | **Generation Stabilization Plan** – On December 15, LUMA filed a motion submitting a presentation and a report titled “Puerto Rico’s Path to Stabilization” which provides a summary of the implementation and accomplishments of the Generation Stabilization Plan, including the addition of 350 MW of generation on the system. On December 18, LUMA filed a motion submitting the First Demobilization Report providing updates on FEMA’s plans to demobilize the 350 MW emergency generation. The report includes the request from the Puerto

Rico Government to FEMA to extend the power mission until December 2024 and support a transition to allow the units to remain in place through a purchase or lease.

- [NEPR-MI-2020-0012](#) | **Renewable Procurement** – On December 6, LUMA filed an Informative Motion on Execution of Tranche 1 Interconnection Agreements and request for determination regarding Interconnection Costs. On December 7, LUMA filed a motion to confidentially submit Executed Interconnection Agreements for Ciro1 and Tranche 1 projects. On December 21, LUMA filed an informative motion submitting the Interconnection Agreements with redactions.
- [NEPR-MI-2020-0019](#) | **System Remediation Plan (“SRP”)** – On December 22, LUMA filed a motion submitting a summary of the FY2024 modifications to the SRP improvement programs as required and requested confidential treatment of the FY2024 Program Brief copies included.

Other filings in December:

- [NEPR-MI-2021-0013](#) | **Electronic Vehicle (“EV”)** – December Time of Use Billing Integration Report (December 8)

5.0 Legislative Matters and Material Legal Update

Monitoring legislative activity, responding to requests for comments and preparing LUMA employees for public hearings is an important and significant responsibility, requiring multiple interactions with members and staff of the Puerto Rico Senate and House of Representatives over the course of many months on some occasions. Responding to these inquiries requires considerable resources and time from LUMA.

Table 5-1: Summary of Requests for Comments or Information in the Puerto Rico Senate, House of Representatives or Fortaleza’s Office of Legislative Affairs

Committee	Act, Bill or Resolution	LUMA Response
Senate Committee on Strategic Projects and Energy	Joint House Resolution 577 – <i>seeks to grant payment plans without needing to make an initial payment or deposit, to any customer, commercial or residential, upon request as long as the debt existed as of November 8, 2023.</i>	On December 4, LUMA received a request for comments. On December 11, LUMA submitted comments.
	Joint House Resolution 344 – <i>orders PREPA and LUMA to design and construct electric power transmission, sub-transmission and distribution facilities for the benefit of the communities of Villa Hugo I, Villa Hugo II and Valle Hill in the Municipality of Canóvanas.</i>	On December 4, LUMA received a request for comments. On December 18, LUMA submitted comments.
	House Bill 1775 – <i>seeks to include shelters that provide services to victims of domestic violence within the indispensable service facilities of the Puerto Rico electric system.</i>	On December 4, LUMA received a request for comments. On December 19, LUMA submitted comments.

Committee	Act, Bill or Resolution	LUMA Response
Senate Committee on Essential Services and Consumer Affairs	Joint Senate Resolution 64 – <i>orders the Department of Natural and Environmental Resources to maximize the use of water from the Southern Aquifer and identify alternative sources so that the use given to the Aquifer is the indispensable one.</i>	On December 6, LUMA received a request for comments.
	Joint House Resolution 565 – <i>orders the PREB, PREPA and LUMA to immediately and in a coordinated manner initiate a process to identify the use of and charge for the use of poles by telecommunications companies in Puerto Rico.</i>	On December 6, LUMA received a request for comments.
House Committee on the Northwestern Region Development	House Resolution 335 – <i>orders to conduct a broad and continuous analysis of all matters related to the socioeconomic development of the municipalities of Arecibo, Hatillo and Camuy.</i>	On December 14, LUMA received a notice to appear in a public hearing. On December 18, LUMA participated in the public hearing.
House Committee on Economic Development, Planification, Telecommunications, Private-Public Partnerships and Energy	House Resolution 243 – <i>purpose is to conduct ongoing research on all matters related to economic priorities, consistent with the socioeconomic development of Puerto Rico.</i>	On December 19, LUMA was summoned to participate in an on-site public hearing. On December 21, LUMA participated in the on-site public hearing.
	Senate Bill 923 (Conf.) – <i>seeks to exempt from compliance with the installation of the "rapid shutdown" provision for renewable energy systems installed on roofs for exclusive residential use of concrete include as part of the FY2024 PR Government Expenditure Budget a budgetary appropriation from FY2023 surplus connections of \$300 million for a loan to PREPA.</i>	On December 5, LUMA received a request for comments. On December 6, LUMA submitted comments.
La Fortaleza – Office of Legislative Affairs	Senate Bill 1064 (Conf.) – <i>seeks to amend Section 4 of Act 114-2007, as amended, known as the "Electric Power Authority Net Metering Program Act," in order to reformulate the term provided to conduct a study on net metering and distributed energy to extend the 120-day restriction for charging residential customers for administrative calculation errors or estimates included in Act 83 to PREPA customers; proposes that these amounts not be subject to interest, surcharges, or penalties.</i>	On December 20, LUMA received a request for comments. On December 21, LUMA submitted comments.

Table 5-2: Material Litigation Update⁵

Case No. & Parties	Description	Updates
SJ2022CV02868 – Ismael Herrero Domenech and the class composed of all residential electrical energy customers of LUMA Energy LLC v. LUMA Energy LLC, Wendco of Puerto Rico Inc. et al. v. LUMA Energy LLC	Consolidated class actions claiming damages stemming from April 6, 2022 event at Costa Sur that caused an island-wide blackout.	On December 4, LUMA filed a petition for Certiorari before the Court of Appeals challenging the Court of First Instance’s denial of LUMA’s Motion to Dismiss for lack of indispensable party. On December 12, the Court of First Instance granted LUMA’s motion to stay the proceedings pending the appeal.
SJ2022CV08894 – UTIER, et. al. v. LUMA Energy ServCo, LLC, et. al.	Damage claim alleging defamation, libel, and cyberbullying in online publications referencing UTIER and Angel Figueroa Jaramillo.	LUMA and the other co-defendants requested an extension of time to comply with the written discovery, which has ensued.
<i>The following cases have had no significant changes since the last report:</i>		
Civil Case No. 22-CV-01357 – CADFI Corp. v. PREPA, LUMA and Municipality of San Juan	Plaintiff alleges that pole placement in sidewalks violates ADA.	
Case No. 17- 04780 PROMESA Title III – Debtor: PREPA	PREPA Bankruptcy	
Civil Cases No. SJ2023CV02513, No. SJ2023CV01793 (consolidated) – LUMA Energy ServCo, LLC v. Municipio Autónomo de Manatí	Challenge to Manatí Municipality’s construction excise tax determinations for LUMA.	

6.0 Ongoing External Audits

LUMA is subject to audits related to its activities under the T&D OMA. Responding to these audits requires considerable resources and time from LUMA.

Table 6-1: Summary of Governmental Audits

Government Entity	Audit Description	Significant Updates
Puerto Rico Comptroller’s Office (OCPR), No. 15592 (PREPA)	Audit to PREPA during the period of June 1, 2018 to June 30, 2021 by virtue of Article III, Section 22 of the Constitution of the Commonwealth of PR and Act 9 of July 24, 1952, as amended.	On December 14, LUMA received an RFI related to Account Payables transactions to which responses were provided on December 15. Also on December 14, another RFI was received related to the Energy Control Center; the information was provided on December 19.

⁵ *Material Litigation Activity* refers to all litigation related to challenges to the OMA, matters that could impede the OMA work or litigation with significant financial risk. This does not include ordinary litigation proceedings that originate as part of the operation of the T&D System, including but not limited to pre-litigation dispute resolution, management of active litigation, discovery, PREB invoice challenges, and other litigation procedures.

Government Entity	Audit Description	Significant Updates
OCPR, No. 15671 (LUMA)	Audit to PREPA operator (LUMA Energy ServCo, LLC) from the period of June 1, 2020 to February 28, 2023 by virtue of Article III, Section 22 of the Constitution of the Commonwealth of Puerto Rico and Act 9 of July 24, 1952, as amended.	On December 15, LUMA received two RFIs related to bank accounts and IT OT which are due on January 8, 2024. LUMA is on track to meet the deadline.
OCPR, No. 15720 (PREPA)	Audit to PREPA from the period of June 1, 2020 to September 30, 2023 by virtue of Article III, Section 22 of the Constitution of the Commonwealth of Puerto Rico and Act 9 of July 24, 1952, as amended.	On December 11, auditors requested additional information regarding LUMA Registered Contracts which was provided on December 15.
KPMG	Audit of PREPA Financial Statements (FY2022)	LUMA has delivered all the necessary information requested by the external auditors and PREPA consultants. The PREPA Financial Statements had an expected issuance date of January 31, 2024; however, this date has shifted towards the end of February 2024. Currently, LUMA and PREPA are working on closing open items prior to the issuance date.
PwC	Audit of ServCo and ManageCo (FY2020 and FY2021)	The ServCo and ManageCo Financial Statements had an expected issuance date of December 31; however, this date has shifted towards the end of January 2024.
<i>The following audits have had no significant changes since the last report:</i>		
OCPR, No. 15560 – Audit of debt issued by the Commonwealth of Puerto Rico and its public corporations from January 1, 2000 – present day.		
OCPR, No. 15637 – Audit of the Municipality of Guánica.		
P3A First Year (FY2022) Operations Audit – Audit of LUMA's (GridCo) first year of financial transactions / operations with ServCo.		

7.0 Material OMA Items

PREPA's Non-Compliance with T&D OMA Obligations

- December was the thirteenth (13) consecutive month in which PREPA did not fully fund one or more of the Service Accounts and thus failed to comply with its contractual obligations, in breach of the T&D OMA. LUMA has issued thirteen (13) non-compliance notices to PREPA and notified P3A.

PREPA Reorganization and Shared Services

- On December 24, LUMA, PREPA and P3A executed an amended and restated Shared Services Agreement which governs the finance and Information Technology / Operations Technology (ITOT) services provided by LUMA to HydroCo, PropertyCo, and HoldCo. The amended Shared

Services Agreement terminates on September 30, 2024, or earlier if PREPA is able to operate independently before this date. All other services covered by the original Shared Services Agreement, including fleet, insurance, and operations, terminated December 31, 2023.

- As of December 30, LUMA and Genera reached an agreement on an amended and restated Shared Services Agreement which governs the finance and Information Technology / Operations Technology (ITOT) services provided by LUMA to GenCo. The amended Shared Services Agreement terminates on September 30, 2024, or earlier if Genera is able to operate independently before this date. All other services covered by the original Shared Services Agreement, including fleet, insurance, and operations, terminated December 31, 2023. The agreement has been fully executed by LUMA, Genera, PREPA, and P3A.
- As of December 31, LUMA, PREPA, and Genera have yet to reach separate collaboration agreements between the parties to document clear roles and responsible for Risk Management, Facilities, OT and Telecom. LUMA continues to work with PREPA and Genera to advance the agreements between the parties.
- Following the execution of the Capital Contribution Agreements (“CCA”) in June 2023, LUMA conducted a thorough review of the vehicle lists attached to the CCAs. As of the end of November, LUMA has not received confirmation from PREPA PropertyCo, PREPA HydroCo, and Genera (as GenCo Operator) of the completion of 49 asset transfers, as requested by LUMA on August 28, to be completed by a deadline of September 8. After several follow ups, in October, LUMA escalated its concerns to PREPA’s Executive Director in November and December, however, the matter remains unresolved as of this date.

PREPA Title III Exit

- The Puerto Rico government and the FOMB continue to work toward confirmation of PREPA’s proposed plan of adjustment. Discovery in respect of the plan is ongoing, and a hearing on confirmation of the plan is scheduled to begin on March 4, 2024. Several expert reports were filed in December as part of the discovery process. LUMA filed two statements on the Title III docket in which it indicated its position with respect to the confidentiality of certain aspects of the bondholders’ expert reports.
- On December 5, the FOMB and the Official Committee of Unsecured Creditors (“UCC”) in PREPA’s Title III case conducted a deposition of several representatives of LUMA as part of the ongoing discovery in connection with the proposed plan of adjustment.
- After Judge Swain dismissed the PREPA bondholders’ remaining counterclaims in the lien challenge litigation, certain bondholders, the UCC, the PREPA bond trustee, the FOMB and AAFAF each appealed to the First Circuit. The bondholder appellants filed their opening briefs on December 11, in which they seek, among other things, a reversal of Judge Swain’s decision limiting the PREPA bondholders’ liens to amounts in the sinking fund and estimating their unsecured net revenue claim at \$2.388 billion instead of the \$8.5 billion asserted amount.
 - The Securities Industry and Financial Markets Association (SIFMA) and a coalition of 14 states filed amicus briefs supporting the bondholder appellants on December 19, arguing essentially that affirmance would disrupt the U.S. municipal bond market and increase the cost of capital for municipalities.

- On December 18, the FOMB filed a notice indicating that approximately 43% of holders of uninsured PREPA bonds had signed on to the “second bond settlement” incorporated in the proposed plan of adjustment.
- Also on December 18, the FOMB filed a notice indicating that it had reached a settlement with the UCC. On December 29, the FOMB filed a fourth amended plan of adjustment incorporating the terms of the UCC settlement into the proposed Title III plan. The settlement provides for, among other things, a minimum of \$335 million in cash to fund distributions from a “GUC trust.”

PREPA Accounting and Financial Risks

- On January 25, 2023 LUMA requested PREPA to provide balance sheet reconciliations. After repeated requests over eight (8) months, PREPA delivered the FY2021 balance sheet reconciliations in September 2023. Upon review of the provided documents, LUMA concluded the documents were incomplete and insufficient to understand the account transactions. LUMA is in the process of collecting the necessary documents to prepare a formal response to PREPA.

LUMA's Billing and Collection Efforts

- LUMA is in the final testing stages for billing system corrections and enhancements related to issues impacting customer bills. The next several initiatives will deploy enhancements and corrections with a focus on improving and reducing estimated bills.
- LUMA reached 4,605 new payment agreements with customers in December, for a total of over 55,000 since June 2021. In December, LUMA completed over 88,000 outbound collection calls for a total of over 1.67 million outbound calls since June 2021. LUMA's Revenue Protection team collected over \$36 million in December directly related to active customer collections including outbound calls, letters, emails and inbound calls.
- LUMA has fully implemented a 30-60-90-day dunning process for Commercial, Industrial and Residential customers that includes disconnection for non-payment to improve Debt Collection and Day Sales Outstanding (DSO).

Third-Party Pole Attachment Collections

- In September 2023, the PREB issued an R&O instructing LUMA to report on the status of collections from Third-Party Attachments (“TPA”) to electrical infrastructure.
- For over a year, LUMA has been engaged in discussions with telecommunications companies with TPAs, as well as key stakeholders, in order to come to an agreement on how to bring the TPAs into compliance with required standards and to collect payments on behalf of PREPA from the telecommunications companies that have TPAs. In particular, LUMA is concerned of the risks on reimbursement with federally funded projects when the telecommunications companies do not properly reattach their equipment to new poles.
- LUMA understands that PREPA has not collected TPA fees from telecommunications and cable companies since FY2017, which has resulted in a significant backlog of uncollected revenue predating LUMA's service commencement.
- LUMA and P3A discussed this issue during a meeting on December 6. As of December 31, LUMA was preparing to request from PREPA copies of all TPA Agreements that have been in effect since FY2017 for LUMA to review and determine outstanding billings and collections.

LUMA Budget Approval, Amendment and Reallocation

- LUMA is highly concerned regarding the procedural and substantive orders and decisions by PREB on LUMA's budgets, reporting and related activities. There are unresolved issues outstanding that stem from PREB's decisions regarding budgets for FY2022, FY2023 and FY2024. These decisions impact LUMA's delivery of O&M Services and the implementation of the T&D OMA.

FY2023 Budget and Reallocation Request

- On July 10, 2023, LUMA filed a motion to show cause on why it should not be fined \$5,000 for reallocating funds in an amount exceeding 5% without obtaining PREB's prior approval and failing to comply with the August 3, 2022 Order. LUMA continues awaiting a response to its motion.

PREB Resolution and Orders regarding LUMA's request for Amendment of FY2022 Budget

- LUMA continues to await a response on LUMA's May 1, 2023 letter to P3A escalating concerns about PREB's budget amendment requirements issued in regards to the FY2022 and subsequent budgets.