



Monthly Report on the T&D System

For the Month of April 2024

May 14, 2024

Contents

- 1.0 Mission, Goals and Areas of Responsibility 1
- 2.0 Monthly Sales Summary 1
- 3.0 System Operations Update..... 2
- 4.0 Puerto Rico Energy Bureau Filings and Hearings..... 4
- 5.0 Legislative Matters and Material Legal Update 6
- 6.0 Ongoing External Audits..... 8
- 7.0 Material OMA Items 9

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 April 2024.

2.0 Monthly Sales Summary

- April consumption (GWh) was 2.5% lower than the previous month (March) and 12.4% higher than the same month of the previous year (April 2023). Energy sales (\$) in April decreased by 2.9% from March and increased 1.0% from April 2023.

Table 2-1. Energy billed by customer segment

Consumption (GWh)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2024 April	595.7	624.8	145.2	26.5	1.9	3.3	1,397.4
2024 March	602.9	667.6	131.9	25.9	1.9	3.0	1,433.2
2023 April	479.7	591.5	143.3	24.1	2.0	2.7	1,243.3

Table 2-2. Energy sales by customer segment

Sales (\$ Million)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2024 April	131.2	149.2	33.3	9.9	0.5	0.7	324.8
2024 March	133.2	159.7	30.7	9.6	0.5	0.7	334.4
2023 April	117.6	156.7	36.5	9.5	0.5	0.7	321.5

Table 2-3. Energy sales by rate component

Energy Sales (\$ Million)	Base	FCA ¹	PPCA ²	CILT & Subsidies ³	Total ⁴
2024 April	93.0	152.3	50.4	29.1	324.8
2024 March	96.7	149.5	64.0	24.2	334.4
2023 April	82.3	173.7	37.9	27.6	321.5

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.

3.0 System Operations Update

Reported Events

- Several generation forced outages occurred during the month. Four (4) resulted in automatic underfrequency loadsheds.
- Several transmission outages occurred during the month.
- No declared emergency events occurred during the month of April.

Table 3-1: Significant Generation Outages

Date	Generation Outages
04/01/2024	Costa Sur 5: Derated
04/02/2024	Aguirre 2: Derated
04/03/2024	Aguirre 2: Derated
04/04/2024	AES 1: Derated
04/05/2024	Aguirre 2: Derated San Juan 5: Derated San Juan TM Units: Forced Outage and Loadshed
04/06/2024	Aguirre 2: Forced Outage
04/08/2024	Aguirre 2: Derated
04/09/2024	AES 1 : Derated AES 2 : Derated
04/10/2024	AES 1: Derated
04/11/2024	AES1: Derated Mayaguez 4: Forced Outage Mayaguez 3: Forced Outage
04/12/2024	San Juan 5: Forced Outage
04/13/2024	San Juan TM: Forced Outage and Loadshed
04/14/2024	San Juan 5: Forced Outage San Juan 9: Forced Outage
04/15/2024	San Juan 9: Forced Outage
04/16/2024	San Juan 9: Derated
04/19/2024	AES 1: Derated
04/20/2024	Costa Sur 5: Maintenance Outage Aguirre 2: Derated
04/21/2024	AES 2: Derated
04/22/2024	Palo Seco TM4: Forced Outage
04/23/2024	Costa Sur 5: Derated AES 2: Derated
04/24/2024	AES 1: Derated
04/25/2024	Palo Seco TMs: Forced Outage Aguirre 2: Derated AES 2: Derated

Date	Generation Outages
04/26/2024	San Juan 9: Derated AES 1: Derated AES 2: Derated
04/27/2024	AES 2: Forced Outage
04/28/2024	AES 1: Derated
04/29/2024	Aguirre 1: Forced Outage Aguirre 2: Forced Outage and Loadshed
04/30/2024	Aguirre 1: Forced Outage and Loadshed Aguirre 1: Forced Outage (second time during the day)

Table 3-2: Significant Transmission Outages

Date	Transmission Outages
04/01/2024	Line 37800 Tripped Aguirre Bank 1 Tripped Line 40100 Tripped Line 40300 Tripped
04/04/2024	Line 37400 Tripped
04/05/2024	Line 37400 Tripped Line 39800 Tripped
04/07/2024	Line 13400 Tripped Line 36100 Tripped Line 51000 Tripped
04/13/2024	Monacillos TC bus #4 Tripped
04/15/2024	Line 51000 Tripped
04/17/2024	Substation Marina Puerto de Rey Tripped
04/21/2024	Line 14400 Tripped. Reclosed.
04/22/2024	Substation Santurce Planta Tripped
04/24/2024	Line 50200 Tripped
04/27/2024	Line 37400 Tripped
04/28/2024	Line 38300 Tripped
04/29/2024	Line 36100 Tripped
04/30/2024	Line 50700 Tripped

4.0 Puerto Rico Energy Bureau Filings and Hearings

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

- [NEPR-AP-2023-0003](#) | **Rate Review** – On April 8, LUMA submitted responses to PREB’s Request for Information (“RFI”) of March 15, providing the requested accounting documentation related to FY2025 and the rate review process. In addition, LUMA requested a continuance of the Technical Conference previously scheduled for April 17 and received approval from the PREB. On April 12, PREB issued a Resolution and Order (“R&O”) to set aside the Rate Review process until the conclusion of the Title III Proceedings.
- [NEPR-MI-2019-0007](#) | **Performance Metrics** – On April 22, LUMA restated the request to the PREB to add the Toa Baja Operational District to the Reliability Metrics and requested PREB’s approval for performing modifications to the Legacy Days Sales Outstanding Government Metric to exclude Contribution in Lieu of Taxes.
- [NEPR-MI-2021-0002](#) | **Federal Funding** – On April 4, LUMA submitted the Venezuela Substation Transformer Replacement Initial Scope of Work (“SOW”) for PREB’s approval. On April 5, LUMA submitted the thirty-eight amended initial SOWs for T&D Projects and three new SOWs for Distribution Line Feeder Rebuilds. On April 15, LUMA submitted the updated 90-Day Plan for T&D Projects. On April 16, LUMA submitted the Primary Control Center / Data Center & Control Room amended SOW for PREB’s approval. On April 18, LUMA informed the PREB that four T&D Projects related to the Distribution Streetlighting and Substation Minor Repairs Improvement Programs were cost obligated by FEMA. Additionally, LUMA submitted 11 Transmission Line Rebuild Initial SOWs for PREB approval.
- [NEPR-MI-2019-0006](#) | **Emergency Response Plan (“ERP”)** – On April 25, PREB held a Technical Conference to discuss the ERP.
- [NEPR-MI-2023-0001](#) | **Wheeling Implementation** – On April 5, LUMA submitted a motion to address stakeholders’ comments on its Motion for Reconsideration filed on March 21, while also reiterating its request to PREB for reconsideration regarding the approved Annual Energy Imbalance Charge (“AEIC”) and the denial of LUMA’s proposal on the demand-related charges of the wheeling rate to be paid by the Retail Electricity Suppliers (“RES”). On April 24, PREB issued an R&O rejecting LUMA’s motion for reconsideration regarding the AEIC and the inclusion of demand-related charges in the wheeling rate paid by RESs, instead of the PPCA to be paid by non-wheeling customers.
- [NEPR-MI-2021-0014](#) | **Load Shedding** – On April 19, LUMA filed a response to PREB’s April 11 RFI regarding the dispatch agreement for the Palo Seco Temporary Units, stating that the units do not have their own specific dispatch or interconnection agreement with LUMA.
- [NEPR-IN-2022-0005](#) | **Bill Objection Process** – On April 26, PREB issued a Final R&O in which it accepted the modifications proposed by LUMA. The modifications were related to the MiLUMA online portal to provide customers with a tool to perform formal bill objections as proposed by LUMA in the January 30, 2023 Motion. LUMA completed all modifications in April 2023. Through the April 26, 2024 Order, PREB further notified the closing of the investigation. PREB requested LUMA to submit the status report of the modifications on or before May 16.

- [NEPR-AP-2023-0004](#) | **Integrated Resource Plan (“IRP”) Review Proceeding** – On April 1, LUMA filed a motion to submit the Responses to the second set of IRP prefiling RFIs and requested confidential treatment for all attachments. On April 11, LUMA filed an Informative Motion to retract the confidentiality treatment requested for all attachments submitted on April 1 and reiterated that all data, estimates, and other information provided may change and may be revised as LUMA develops the 2024 IRP. On April 15, PREB issued two (2) separate R&O’s: 1) The first R&O ruled on the three partial waivers of Regulation 9021 requested by LUMA on February 29, and discussed during the January 30 Prefiling Technical Conference. PREB granted one of the waivers and denied the other two, ordering LUMA to submit all available information at the time of the filing; 2) The second R&O granted LUMA’s request to retract confidential treatment to the attachments of Response to the second set of IRP prefiling RFIs as requested on April 11.
- [NEPR-MI-2021-0008](#) | **Customer Bill** – On April 8, PREB issued an R&O approving LUMA’s request to include the Interim Electric Vehicle Time of Use (“EV TOU”) Rate in the customer bill, as filed on March 28.
- [NEPR-MI-2021-0013](#) | **Electric Vehicle (“EV”)** – On April 29, LUMA filed a motion to submit the Interim EV TOU Rate to include the formula for the EV TOU Rate and proposal to provide the calculated rate on LUMA’s website where it could be accessible to all customers. On April 30, LUMA submitted an Informative Motion regarding the launch of Interim EV TOU Rate and requested a release from requirements to file further Billing Integration Reports and to consider the May Billing Integration Report as the last report to be submitted.
- [NEPR-MI-2019-0009](#) | **Interconnections Regulation** – On April 22, LUMA filed a response to SESA’s April 4 request, regarding the Smart Inverter Settings Sheets – Technical Bulletin published by LUMA on April 1.
- [NEPR-MI-2024-0002](#) | **LUMA’s Accelerated Storage Addition Program (“ASAP”)** – On April 26, LUMA filed a motion to submit the ASAP structure and concept in compliance with the April 19 R&O and request a determination of consistency with Energy Public Policy.

Other filings in April:

- [NEPR-MI-2021-0015](#) | **Renewable Energy Portfolio Compliance Report**– Annual Compliance Report (April 1)
- [NEPR-MI-2021-0013](#) | **EV** – March Billing Integration Report (April 8)
- [NEPR-MI-2024-0001](#) | **PREB Approved Investments** – First status report for PREB Approved Investments (April 12)
- [NEPR-MI-2019-0007](#) | **LUMA’s Performance Metrics** – Quarterly Performance Metrics Report, January-March 2024 (April 22)
- [NEPR-MI-2019-0016](#) | **Interconnection Progress Reports** –Interconnections Progress Report for January through March 2024 (April 25)

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 Governor's Office of Legislative Affairs

Committee	Act, Bill or Resolution	LUMA Response
Senate Committee on Southern Region Development	Senate Resolution 806 – <i>orders a continuous investigation on the various problems in the Senatorial District of Guayama; and for other related purposes.</i>	LUMA received on April 2, an RFI. On April 3, LUMA submitted the requested information.
Senate Committee on Energy and Strategic Projects	Joint House Resolution 604 – <i>orders PREB to issue a resolution to vacate the provisions contained in subsection (3) of Article B (Review by Supplemental Study) of Regulation 8915, related to the Interconnection of the Distribution System of PREPA and PREPA's participation on The Net Metering Programs of February 6, 2017.</i>	LUMA was notified on April 4 to submit comments regarding the Joint Resolution. LUMA submitted the comments on April 15.
House Committee on the Northern Region Development	House Resolution 648 – <i>orders to conduct exhaustive investigation related to the economic and social situation of various municipalities.</i>	LUMA was notified on April 9 that it would be required to attend an on-site hearing in Morovis on April 29. LUMA took part in the public hearing.
Hon. José Hernández Concepción	RE: <i>Meeting with Venus Gardens, Villa Andalucía and Park Gardens Communities in San Juan.</i>	On April 15, LUMA was summoned to participate on a meeting with communities in San Juan.
House Committee on Economic Development, Planification, Telecommunications, Private-Public Partnerships and Energy	House Bill 1380 – <i>amends Section 1 and adds a new Section 5 to Act 39-2020, known as the "Act to Prohibit the Interruption of Electricity and Drinking Water Services During the Validity of EO-2020" related to the establishment of payment plans for the amount owed for essential services during the pandemic period.</i>	LUMA was notified on April 18 to submit comments regarding the Bill. LUMA submitted the comments on April 29.
	House Bill 1380 – <i>amends Subsection (h) of Section 4.1 of Act 57-2014, known as the "Puerto Rico Energy Transformation and Relief Act," for the purpose of ordering several government entities to publish on their respective web portals monthly updates related to billing and energy consumption studies and related data.</i>	LUMA was notified on April 18 to submit comments regarding the Bill.

Committee	Act, Bill or Resolution	LUMA Response
Senate Committee on Innovation, Telecommunications, Urbanism, and Infrastructure	Senate Resolutions 110 – <i>orders to investigate the reasons why different communities in various municipalities experience intermittent, scarcity, low pressure or prolonged interruptions in drinking water service from PRASA.</i>	On April 30, LUMA was summoned to participate in an <i>on-site</i> executive hearing on Bo. Cuchillas in Morovis to be held on May 8.

Table 5-2: Material Litigation Update⁵

Case No. & Parties	Description	Updates
Domingo Marrero v. Mun. de Guánica, Civil Case No. PO2021CV00963	Plaintiff alleged that pole placement in sidewalks violates the Americans with Disabilities Act (“ADA”).	On April 8, LUMA and PREPA requested additional time to file the responsive pleadings. The Municipality of Guánica requested that a default judgment be issued against LUMA. The Court denied said motion and granted LUMA’s request for additional time on April 11. On April 26, LUMA and PREPA jointly filed a motion informing that the case must be stayed under PROMESA Section 301(a). On April 26, the Court granted the Plaintiff and the Municipality of Guánica 20 days to respond.
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.	The Court issued an Order allowing the Split of the Complaint’s causes of action to merge the first three and the fifth causes of action. The Court reserves its decision on the fourth cause of action (challenging the tax imposed on an alleged project cost) until a final determination takes place for the other causes of action. The Court also granted a final 90-day extension to conduct discovery limited to the same causes of action.
Civil Case No. 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 from the April 6, 2022- event at Costa Sur that caused an island-wide blackout.	On April 1, LUMA filed a writ of certiorari before the Supreme Court challenging the Court of Appeals decision confirming the denial to LUMA’s Motion to Dismiss the Complaint for failure to include PREPA as an indispensable party.

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.

The following cases have had no significant changes since the last report:

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.
Civil Case No. 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.

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. 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 April 2, LUMA received an RFI related to journal entries for the service accounts transfers, as well as the related worksheet for the minimum balance. The information was submitted on April 12.
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 Puerto Rico, and Act 9 of July 24, 1952, as amended.	On April 2 and April 3, the OCPR auditors sent two separate RFIs in connection with the interview held on March 27 with a LUMA resource at the Transmission Operation Center (“TOC”) in Monacillos. The information for both RFIs was submitted on April 12. On April 26, OCPR auditors requested a third RFI related to a table for planned, coordinated or forced outages from the generation plants and the total impact on affected clients. A response is expected to be provided in early May.
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 April 29, OCPR auditors requested additional clarification related to the March 19 interview of a LUMA resource from Procurement and Contracts. Response was sent the same day.

Government Entity	Audit Description	Significant Updates
KPMG	Audit of PREPA Financial Statements (FY2023)	FY23 audit started during April. LUMA has been providing all the data requested by KPMG and PREPA. The expected release date is August 15, as requested by the department of Treasury. LUMA is committed to meeting this deadline.
<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

- April was the seventeenth (17) consecutive month in which PREPA did not fully fund one or more of the Service Accounts and failed to comply with its contractual obligations, in breach of the T&D OMA. April was also the fourth (4) consecutive month in which PREPA did not provide any funding for the Outage Event Reserve Account. LUMA has issued seventeen (17) non-compliance notices to PREPA and notified P3A.
- In January 2023, LUMA requested PREPA to provide balance sheet reconciliations. After multiple 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 has continued to request from PREPA complete information required for these reconciliations. Until these are provided and PREPA provides a segregated opening balance sheet for the T&D system, LUMA is unable to provide certain O&M Services related to financial reporting. LUMA has also communicated concerns to P3A and FOMB that certain historical PREPA financial systems and information turned over to LUMA at commencement may also impact reporting contemplated under the Title III proposed POA. LUMA continues to escalate these matters.

LUMA's Performance Metrics

- In January 2024, PREB issued a final R&O in case NEPR-AP-2020-0025, in which it approved LUMA's Performance Metrics with modifications to the Revised Annex IX to the T&D OMA on the baselines, base points, weights, targets, and to certain metric components, definitions, and review processes. In February, LUMA filed a Motion for Reconsideration requesting PREB to vacate its ruling. In the reconsideration motion LUMA argues due process violations and interference with essential provisions of the T&D OMA by modifying the annual performance

targets, incentive tiers impacting the Performance Metrics, Major Outage Events Metrics, and the reallocation of basepoints and weights.

- PREB's decisions include substantial modifications not only to the incentive structure agreed to by the parties to the T&D OMA, but also to the roles and responsibilities assigned to P3A as Administrator of the contract. LUMA is highly concerned that PREB's decision deprives LUMA of a reasonable opportunity to earn the Incentive Fee.
- On April 22, LUMA submitted the Quarterly Performance Metrics Report, covering the months from January through March 2024.

PREPA Reorganization and Shared Services

- LUMA will terminate all shared services provided through the Shared Services Agreements by September 30 and strongly encourage both PREPA and Genera PR to execute their respective implementations plans to achieve the separation by said date. LUMA remains concerned with the lack of progress made to date towards Shared Service Exit.
- The Facilities Collaboration Agreement ("FCA") between LUMA and PREPA has been revised to incorporate changes to Exhibit A and it shall be executed during the month of May. During April, LUMA and PREPA had been working closely to finalize the IT/OT Collaboration Agreement ("OTCA"). The document's final draft is completed and is pending signature from the parties.
- LUMA, PREPA, and Genera are working collaboratively in finalizing the provision for the Insurance, and Telecom Services Collaboration Agreements. LUMA will continue 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, 2023, to be completed by a deadline of September 8, 2023. After several follow-ups, LUMA escalated its concerns to PREPA's Executive Director in November and December, however, the matter remains unresolved as of April.

PREPA Title III Exit

- Judge Swain held a two-week trial to consider confirmation of PREPA's proposed Plan of Adjustment from March 4 - March 19. The parties filed amended proposed findings of fact and conclusions of law on April 1. Judge Swain's decision on confirmation remains pending.
- Numerous parties objected to confirmation of PREPA's proposed Plan of Adjustment, including GoldenTree, Syncora, Assured, the PREPA bond trustee, the ad hoc group of non-settling PREPA bondholders, UTIER, SREAEE, and miscellaneous creditors and other parties in interest. The FOMB, AAFAF, the Fuel Line Lender group, and several other parties argued in support of confirmation.
- On April 12, PREB entered an order setting aside its previous rate review deadlines and milestones so that all matters associated with PREPA's exit from Title III may be considered at the same time, including the proposed Legacy Charge and the issue of funding PREPA's legacy pension obligations.

- GoldenTree and Syncora filed a motion in February seeking to renew their request for relief from the automatic stay to allow them to enforce their statutory right to obtain the appointment of a receiver. The PREPA bond trustee joined in this motion on April 19. On April 24, the FOMB and AAFAF objected to what they characterized as the bondholders' fifth attempt to seek this relief. The FOMB argued that (i) the motion is premised on an erroneous application of the Fifth Amendment; (ii) is an improper and untimely request for reconsideration of the title III court's prior decisions; (iii) the bondholders do not have a property right in PREPA's property that is subject to "adequate protection" under the Bankruptcy Code; and (iii) the bondholders have not demonstrated cause to lift the automatic stay for them to pursue the receivership remedy. The bondholders filed a reply on May 1, arguing that the automatic stay is "destroying" their right to seek appointment of a receiver. The court will hold a preliminary hearing on the motion on May 22.

LUMA's Billing and Collection Efforts

- LUMA continues to refine the CC&B algorithm change deployed in March to further decrease the number of customers receiving an estimated bill. Additional initiatives will deploy enhancements and corrections with a focus on improving and reducing estimated bills over the next several months.
- LUMA reached 4,489 new payment agreements with customers in April, for a total of over 77,594 since June 2021. In April, LUMA completed over 83,000 outbound collection calls for a total of over 2.0 million outbound calls since June 2021. LUMA's Revenue Protection team collected over \$30.4 million in April directly related to active customer collections of past due receivables including outbound calls, letters, emails, and inbound calls.

Third-Party Pole Attachments ("TPA")

- In April, LUMA held an informal meeting with the Puerto Rico Telecommunications Bureau ("TEB") to respond to their technical questions. During this month, LUMA also provided data to the Office of Management and Budget to be used by the Puerto Rico Broadband Program, which primary purpose will be to coordinate, authorize, and execute the disbursement of local and federal funds allocated to Puerto Rico for the construction of broadband infrastructure on the island.

Net Energy Metering

- In compliance with the current regulation of distributed generation interconnection, LUMA successfully completed all backlogged 35,000 supplemental studies. LUMA is in the process of conducting field verification and preparing the cost and timeline information to share with the developers. The studies cover distribution feeder voltage, thermal and protection analyses, which are critical to maintaining the distributed system's stability and reliability. Based on the results of the studies, LUMA may identify system upgrades that will need to be implemented due to distributed generation additions.

LUMA Budget Approval, Amendment and Reallocation

- LUMA continues to be concerned with PREB's procedure and orders on LUMA's budgets, reporting and related activities. Issues remain outstanding stemming from PREB's decisions on the budgets for FY2022, FY2023 and FY2024, as well as excessive reporting requirements including a new very broad requirement in a new case (NEPR-MI-2024-0001) for additional detailed reporting on all capital projects.
- On March 28, LUMA filed a Budget Amendment for FY2024 budget with P3A for review and approval. On April 16, P3A acknowledged that pursuant Section 7.3(3) of the T&D OMA, any redistribution of the Operating Budget will not require the approval of the Administrator. As of the close of April, the PREB had not issued a determination on LUMA's Budget Amendment.

Rate Case

- On April 12, PREB set aside all timelines and milestones for the Rate Case established in March 15, indicating that they may issue updated timelines and milestones once the PREPA Plan of Adjustment under Title III of PROMESA is confirmed. PREB ordered that PREPA must inform them within 5 business days of confirmation of the Plan of Adjustment. PREB's order retained their ability to resume the rate case at any time and ordered LUMA to file consolidated budgets for FY2025 consistent with 2017 Base Rates, submitting any substantial differences and modifications from the FY2024 as part of the submission. LUMA started work in April towards the development of an FY2025 Budget proposal pursuant to the latest PREB directives.