

Monthly Report on the T&D System

For the Month of March 2025

April 14, 2025



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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 March 2025.

URGENT CASH MATTERS

March 2025 is the twenty-eight (28th) 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. March 2025 is also the fifteenth (15th) consecutive month in which PREPA did not provide any funding for the Outage Event Reserve Account. March 2025 is also the sixth (6th) consecutive month in which PREPA did not provide the required funding to replenish the Contingency Reserve Account. Funding the Service Accounts, including the Outage Event Reserve Account and the Contingency Reserve Account, is an obligation of the Owner, pursuant to Section 7.5 of the T&D OMA. To date, PREPA has failed to identify a funding source to meet its obligations under the T&D OMA. Furthermore, PREPA has only funded \$3,272,344 million for the Fiscal Year 2025 Energy Efficiency program as authorized and approved by the Puerto Rico Energy Bureau ("PREB").

2.0 Monthly Sales Summary

Consumption in March 2025 increased by 12.3% compared to the previous month (February 2025) and decreased by 8.4% compared to the same month of the previous year (March 2024). In March 2025, energy sales (\$) increased by 17.0% compared to February 2025 and 10.8 % compared to March 2024.

Table 2-1. Energy billed by customer segment

Consumption (GWh)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2025 March	514.8	639.4	127.5	26.4	2.1	3.1	1,313.3
2025 February	445.0	579.9	114.7	25.6	1.8	2.8	1,169.8
2024 March	602.9	667.6	131.9	25.9	1.9	3.0	1,433.2

Table 2-2. Energy sales by customer segment

Sales (\$ Million)	Residential	Commercial	Industrial	Public Lighting	Agriculture	Other Authorities	Total ⁴
2025 March	135.0	185.8	36.9	11.40	0.6	0.8	370.5
2025 February	113.8	159.4	31.3	10.8	0.5	0.8	316.6
2024 March	133.2	159.7	30.7	9.6	0.5	0.7	334.4

Table 2–3. Energy sales by rate component

Energy Sales (\$ Million)	Base	FCA ¹	PPCA ²	CILT & Subsidies & EE ³	Total ⁴
2025 March	88.5	194.1	63.1	24.8	370.5
2025 February	77.0	160.3	56.9	22.4	316.6
2024 March	96.7	149.5	64.0	24.2	334.4

3.0 System Operations Update

Reported Events

- In March 2025, a total of seven (7) base load generation forced outages occurred. Four (4) load sheds occurred because of generation outages that resulted in the activation of the Under Frequency Load Shed (“UFLS”⁵).
- There were no events that required LEOC activation during the month of March.

Table 3–1: Significant Generation Outages by Site for February 2025

Site Name	Derated ⁶	Forced Outage ⁷	Loadshed ⁸	Planned / Maintenance Outages ⁹
San Juan 5	5	4	1	0
San Juan 9	3	0	0	0
Palo Seco 3	6	2	1	0
Costa Sur 6	3	0	0	1
AES 1	8	1	2	0
AES 2	11	0	0	0
EcoEléctrica	0	0	0	0
TOTAL	36	7	4	1

¹ FCA: Fuel Charge Adjustment

² PPCA: Purchased Power Charge Adjustment

³ CILT: Contribution In Lieu of Taxes and EE: Energy Efficiency

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

⁵ Under Frequency Load Sheds occur when the system frequency drops below 59.2 Hz.

⁶ Derated: A reduction in power generation capacity, typically due to technical limitation.

⁷ Force Outage: Unplanned shutdown of a power station, generation unit, transmission or distribution lines due to unexpected breakdown or failure.

⁸ Loadshed: A protective Electric System mechanism to curtail demand for electric power, typically due to power supply shortfalls or disturbances.

⁹ Maintenance Outages: A generating unit shutdown for planned maintenance service.

Table 3–2: Total Significant Generation Outages by Month

Outage Type:	Derated	Forced Outage	Loadshed	Loadshed due to Generation Shortfall ¹⁰	Planned / Maintenance Outages
2025 March	36	7	4	0	1
2025 February	27	10	4	2	2
2024 March	46	15	7	1	2

Table 3–3: Significant Transmission Outages by Line / Transformer for February 2025

Site Name	Line Trips ¹¹	Transformer Trips ¹²	Substation Trips ¹³
Aguas Buenas Sector 38 kV Bus	0	0	1
Cambalache Gas Plant Bank 230/115 kV	0	1	0
Juan Domingo 38 kV Bus	0	0	1
La Rambla 38 kV Bus	0	0	1
Line - 36100 BO Piñas GIS – Ciales	1	0	0
Line - 36100 Dos Bocas HP - Barrio Piñas GIS	3	0	0
Line - 36200 Monacillos TC – Juncos TC	1	0	0
Line - 37100 San German – Guánica	1	0	0
Line - 37400 Cambalache TC – Barceloneta TC	1	0	0
Line - 37400 Cambalache TC – Dos Bocas HP	1	0	0
Line - 37600 Palo Seco SP – Bayamon TC	1	0	0
Line - 37700 Bayamon TC - Palo Seco SP	1	0	0
Line - 39000 Caguas TC – Hacienda San Jose	1	0	0
Line - 50200 Manati TC – Costa Sur SP	1	0	0
Substation #5004	0	0	1
Veredas Sector 38 kV Bus	0	0	1
Villamar 38 kV Bus	0	0	1
Villamar Substation #1657	0	0	1
Total	12	1	7

Table 3–4: Total Significant Transmission Outages by Month

Outage Type:	Line Trips	Transformer Trips	Substation Trips
2025 March	12	1	7
2025 February	10	5	18

¹⁰ Loadshed due to Generation Shortfall: Occurs when the demand for electricity becomes higher than the available supply.

¹¹ Line Trips: A protective disconnection of a transmission or distribution line due to a fault or abnormal condition.

¹² Transformer Trips: The automatic shutdown of a transformer triggered by protective relays due to faults such as overloads or internal issues.

¹³ Substation Trips: The protective disconnection of electrical equipment within a substation, often caused by faults or abnormal operating conditions.

Outage Type:	Line Trips	Transformer Trips	Substation Trips
2024 March	23	1	12

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 March 5, 2025, LUMA submitted its responses to the February 21, 2025, prehearing conference bench orders. On March 7, LUMA participated in a technical conference. On March 10, the Hearing Examiner issued a list of legal and procedural questions, which LUMA responded to on March 13. On March 14, the Hearing Examiner issued additional questions to which LUMA submitted its responses on March 17.
- [NEPR-IN-2024-0003](#) | **June 12 Large-Scale Blue-Sky Customer Interruptions Incident** – On March 6, 2025, LUMA submitted its comments concurring with the recommendations and observations presented in EPRI’s Final Report that determined that the investigation has not revealed any violations of the public energy policy.
- [NEPR-MI-2024-0005](#) | **System Improvements Plan** – On March 6, 2025, LUMA submitted an analyses of the adequacy of the generation supply portfolio each year in the annual Resource Adequacy Report as required by the T&D OMA. On March 24, LUMA submitted information related to the interconnection studies needed for the 800 MW of generation proposed by Genera.
- [NEPR-MI-2020-0012](#) | **Renewable Procurement Plan** – On March 10, 2025, LUMA submitted a request for determination regarding the allocation of responsibilities for the costs associated with the work that are necessary to interconnect the Tranche 2 projects.
- [NEPR-MI-2021-0002](#) | **Federal Funding** – On March 11, 2025, LUMA submitted the updated 90-Day Plan for Transmission & Distribution projects. On March 13, LUMA submitted one initial Scope of Work, for the Fiber Optic Repair and Replacement program and an updated Project List. On March 28, LUMA submitted the March Progress Report for the 4x25 MW BESS Project.
- [NEPR-IN-2023-0003](#) | **Commercial Bill Estimates** – On March 14, 2025, PREB denied the objections presented by LUMA on February 18, 2025, to the conclusions and recommendations contained in the Final Resolution and Order dated January 27, 2025.
- [NEPR-AI-2025-0001](#) | **Notice of Noncompliance with the Puerto Rico Energy Public Policy** – On March 17, 2025, LUMA submitted its response, which included detailed assessments conducted by third-party external experts, in support of LUMA’s position that the Notice of Noncompliance with System Average Interruption Duration Index (‘SAIDI’) Metric issued by PREB on February 11 should be vacated without further action by the PREB.
- [NEPR-MI-2022-0002](#) | **Resource Adequacy Study** – On March 21, 2025, LUMA submitted an update to the Fiscal Year (“FY”) 2025 Resource Adequacy Report to reflect the vulnerable condition of generation supply on the island and the increase likelihood of loadshed during peak demand periods as a result of insufficient generation capacity made available by generation suppliers.

- [NEPR-AP-2023-0004](#) | **Review of the PREPA Integrated Resource Plan (“IRP”)** – On March 27, 2025, LUMA submitted the Second Interim 2025 IRP Filing. The filing included the results of the Preliminary Preferred Resource Plan, Preliminary Portfolios A to J resulting from Scenarios 1 to 10, preliminary results of Flexibility Analysis, Scorecard to select the Preliminary Preferred Resource Plan, and Summary of the Third Round of SETPR Stakeholder Meetings held in January 2025.
- [NEPR-MI-2020-0001](#) | **Permanent Rate** – On March 28, 2025, PREB issued an Order Setting Factors for the 4th Quarter of FY2025.
- [NEPR-MI-2021-0013](#) | **Electric Vehicles (“EV”)** – On March 31, 2025, LUMA submitted its response to PREB’s Request of Information (“RFI’s”) related to the FY25 First Semi-Annual Report.
- [NEPR-MI-2021-0004](#) | **Initial Budgets** – On March 31, 2025, LUMA submitted a notice of the need to submit a budget amendment for FY2025.

Other Filings made during March 2025:

- [NEPR-MI-2020-0001](#) | **Permanent Rate** – Quarterly Fuel Cost Adjustment (“FCA”) and Purchase Power Charge Adjustment (“PPCA”) factors (March 17)
- [NEPR-MI-2022-0001](#) | **Energy Efficiency (“EE”) and Demand Response (“DR”) Transition Period Plan** – Monthly Report on the development of the Backup Generator DR Program (March 17)
- [NEPR-MI-2020-0015](#) | **Annual Compliance Report** – Annual Compliance Report regarding the Renewable Energy Portfolio for the 2024 calendar year (March 31)

5.0 Legislative Matters & 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.

Table 5–1: Summary of Relevant Legislation and 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
House of Representatives of Puerto Rico - Government Committee	The House Committee summoned LUMA to a public hearing and requested our input regarding House Resolution Num. 42. In this occasion the Committee will investigate the preparedness for hurricane season, installation and repair of streetlights, renewable energy projects and the possible closure of Customer Experience Centers.	On March 11, 2025, LUMA received a public hearing summoning and request for input regarding House Resolution Num. 42.

Committee	Act, Bill or Resolution	LUMA Response
House of Representatives of Puerto Rico - Government Committee	The House Committee summoned LUMA to a public hearing and requested our input House Bill Num.133, which proposes to create the "Fair Payment Plans to Ensure Continuity of Essential Services Act".	On March 12, 2025, LUMA received a public hearing summoning and request for input regarding House Bill Num.133.
House of Representatives of Puerto Rico - Municipal Affairs Committee	The House Committee requested LUMA tour input Request for Input on House Bill Num. 430 to amend Law 107-2020, known as the "Municipal Code of Puerto Rico," which requires the notification of work aimed at normalizing or restoring the electric power system by the municipality during a state of emergency.	On March 27, 2025, LUMA received the request for input regarding House Bill Num. 430.
Senate of Puerto Rico - Government Committee	The Senate Committee summoned LUMA to a public hearing and requested our input regarding the Senate Resolution Num. 85 which orders the Government Committee of the Senate of Puerto Rico to conduct a thorough investigation into the possible closure of seven (7) LUMA Energy Customer Experience Centers.	On March 12, 2025, LUMA received a public hearing summoning regarding Senate Resolution Num. 85. LUMA provided a written response on March 18 th and attended the public hearing held on March 19 th .
Senate of Puerto Rico - Government Committee	Request for Additional Information regarding Senate Resolution Num. 85 which orders the Government Committee of the Senate of Puerto Rico to conduct a thorough investigation into the possible planned closure of seven (7) LUMA Energy Customer Experience Centers.	As a result of the public hearing held on March 19, 2025, LUMA received a Request for Additional Information regarding Senate Resolution Num. 85. LUMA provided the response on March 26 th .
Senate of Puerto Rico - Transportation, Telecommunications, Utilities, and Consumer Affairs Committee	The Senate Committee requested LUMA our input regarding Senate Bill Num. 257, which has the purpose of amend Article 1, add a new Article 5 to Law 39-2020 known as the "Law to Prohibit the Interruption of Electricity Services and Drinking Water During the Validity of OE-2020-023 due to the Pandemic of Coronavirus (COVID-19)".	On March 13, 2025, LUMA received the request for input regarding Senate Bill Num. 257.

Table 5–2: Material Litigation Update¹⁴

Case No. & Parties	Description	Updates
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 March 25, 2025, LUMA submitted its answers to the written discovery served by the Plaintiffs.
Civil Cases No. SJ2023CV01793, No. SJ2023CV02513 (consolidated) – LUMA Energy ServCo, LLC v. Municipio Autónomo de Manatí	Challenge to Manatí Municipality’s construction excise tax determinations for LUMA.	On March 26, 2025, LUMA filed its Reply in Support of its Motion for Summary Judgment.
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.	
Domingo Marrero v. Mun. de Guánica, Civil Case No. PO2021CV00963	Plaintiff alleged that pole placement in sidewalks violates the Americans with Disabilities Act (“ADA”).	

6.0 Ongoing External Audits

LUMA is subject to multiple audits related to its activities under the T&D OMA. LUMA takes all required audits under T&D OMA very seriously and therefore allocates considerable resources and time to completion of these.

Table 6–1: Summary of Governmental Audits

Government Entity	Audit Description	Significant Updates
Comptroller’s Office of Puerto Rico (“OCPR”), No. 15592 (PREPA)	Audit of PREPA during the period of June 1, 2018 – June 30, 2021, by virtue of Article III, Section 22 of the Constitution of the	On March 25, 2025, OCPR sent an RFI requesting an update of the Representation Letter previously submitted on December 9, 2024, extending the period to January 31,

¹⁴ 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
	Commonwealth of Puerto Rico, and Act 9 of July 24, 1952, as amended.	<p>2025. The information was submitted on March 28, 2025.</p> <p>On March 25, 2025, OCPR sent an RFI related to the names of the employees that have occupied the position of Chief Legal Officer from 6/1/2020 to 12/31/2024. The information was submitted on March 27, 2025.</p>
Comptroller’s Office of Puerto Rico (“OCPR”), No. 15720 (LUMA)	Audit of PREPA during the period of June 1, 2018 – 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.	<p>On March 11, 2025, OCPR sent an RFI related to inquiries over reports and data on Asset Suite. The information was submitted on March 13, 2025.</p> <p>On March 26, 2025, OCPR sent a second RFI related to disbursements made to a selected vendor from a sample. The information was submitted on March 31, 2025.</p> <p>On March 27, 2025, OCPR sent a third RFI related to file from a selected sample. The information is expected to be submitted by April 3, 2025.</p>
Comptroller’s Office of Puerto Rico (“OCPR”), No. 15794 (LUMA)	Audit of PREPA during the period of June 1, 2018 – 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 March 4, 2025, OCPR sent an RFI related to the organization chart for the Revenue Management area, a list of CC&B system reports utilized by the Revenue Protection, Payment Processing, and Energy Irregularities groups, as well as a report generated from CC&B. The information was submitted on March 7, 2025
PREPA Fiscal Year (“FY”) 2023	KPMG Audit of PREPA Financial Statements (“FY2023”)	Audit started in April 2024. LUMA has been providing all data requested by KPMG and PREPA. The expected release date was for late March 2025, however this has shifted towards late April 2025. LUMA is committed to supporting PREPA’s updated deadline.
PR Treasury Department & Municipalities by PwC	PwC Audit of LUMA Energy, LLC 2022 (Consolidated: ManageCo & ServCo and Standalone: ServCo) – Financial Statements	Audit started at the beginning of August 2024 and remains ongoing. Target issuance date have shifted to April 2025 for FY22, while FY2023 target issuance date is June 2025.

Government Entity	Audit Description	Significant Updates
P3A FY2022 Audit – by Vázquez & Vilanova	First Year (“FY2022”) OMA Compliance – audit for the first full year of LUMA operations.	LUMA provided its final response to the audit on December 20, 2024. LUMA is currently waiting for P3A’s feedback.
P3A FY2023 Audit – by Vázquez & Vilanova	Second Year (“FY2023”) OMA Compliance – audit for the second year of LUMA operations.	On January 17, 2025, LUMA provided the last of the responses to all RFI’s sent by P3A. P3A and its auditors requested additional information the week of February 7 th , and LUMA responded to the request. LUMA is currently waiting for P3A’s feedback on the submitted responses.
P3A FY2024 Audit – by Vázquez & Vilanova	Third Year (“FY2024”) OMA Compliance – audit for the third year of LUMA operations.	On January 17, 2025, LUMA provided the last of the responses to all RFI’s sent by P3A. LUMA is currently waiting for P3A’s feedback on the submitted responses.
Union Pension Plan Compliance (“NEBF”) 2023 (Calendar) Audit – by Withum	Pursuant to Article 6, Sections 6.7 and 6.8 of the Restated Employees Benefit Agreement and Trust for the National Electrical Benefit Fund, the Trustees of the Fund have established a Payroll Audit Program.	On February 19, 2025, LUMA followed up on the updated audit report, which will be provided by the end of February.
P3A Federal Funding Audit – by Kevane Grant Thornton	Audit on the Management of Federally Funded Capital Improvements	Throughout March 2025, LUMA hosted several meetings with Kevane’s Auditors to review LUMA’s Request for Reimbursement Process. Additionally, LUMA has responded to various RFIs following the meetings. LUMA is currently working with Kevane to answer follow up questions as they arise.
COR3 - Central Office for Recovery, Reconstruction and Resiliency Monitoring by Deloitte	Deloitte Monitoring for Q1-FY2025 Federal Funding process.	On January 24, 2025, LUMA received a response from COR3. LUMA will continue to respond to the remaining follow ups by their respective deadlines. LUMA is currently working on a status update addressing the ongoing items.
<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.		

Government Entity	Audit Description	Significant Updates
OCPR, No. 15671 – Audit to PREPA for the period of June 1, 2018 – June 30, 2021.		

7.0 Material T&D OMA Items

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

- March 2025 is the twenty-eight (28th) 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.
- March 2025 is the fifteenth (15th) consecutive month in which PREPA did not provide any funding for the Outage Event Reserve Account.
- March 2025 is the sixth (6th) consecutive month in which PREPA did not provide the required funding to replenish the Contingency Reserve Account.
- LUMA has issued twenty-eight (28) non-compliance notices to PREPA and notified P3A as Administrator of the T&D OMA.
- Since January 2023, LUMA has been requesting PREPA provide balance sheet reconciliations. Until initial balance sheet reconciliations are provided, including a segregated opening balance sheet for the T&D system, LUMA is prevented from providing certain Operation and Maintenance ("O&M") Services related to financial reporting under T&D OMA. On August 20, 2024, FTI was contracted by AAFAF to define the scope of PREPA's Accounting Remediation project, including the balance sheet separation efforts. To date, LUMA has not been informed of the FTI project results.

LUMA Budget Approval, Amendment and Reallocation

- On March 5, 2025, the PREB issued a resolution and order maintaining the requirement for pre-approval of budget amendment and reallocation and for such requests to be filed within forty-five days after the end of the third quarter of any fiscal year. PREB also acknowledged that emergencies may occur during the fourth quarter of any fiscal year or throughout the year, therefore they emphasized that LUMA may, at any time (including the fourth quarter), file an urgent budget amendment or reallocation request if necessary for emergency action, which they said will address promptly.

PREPA Reorganization and Shared Services

- In February 2025, LUMA and PREPA agreed, in good faith, to extend the existing Amended and Restated Shared Services Agreement ("A&R SSA") until June 30, 2025, as stated in the 2025 Fiscal Plan and requested by PREPA. As required by the executed extension of the A&R SSA, PREPA is required to submit an updated separation plan through the end of June 2025. As of the end of February 2025, LUMA has not received the required updates from PREPA and LUMA is concerned that PREPA will fail yet again to assume its responsibilities under the A&R SSA and

continue to burden LUMA in the provision of services far beyond the original intend of the T&D OMA.

PREPA Title III Exit

- On March 3, 2025, Judge Swain entered an order regarding potential litigation in Title III case. The court directed the parties to meet and confer with the mediation team to agree upon a proposed litigation and discovery schedule to consider (i) what moneys constitute PREPA's net revenues, (ii) whether and to what extent the PREPA bondholders have an administrative expense claim arising out of PREPA's post-petition use of net revenues, and (iii) the extent to which any such administrative expense claim must be paid out of moneys other than existing or future net revenues.
- On March 20, 2025, Title III court entered an order modifying the litigation stay in PREPA's title III case specifically to:
 - Permit the FOMB to file an amended plan of adjustment for PREPA and an amended disclosure statement by March 28, 2025;
 - Permit the parties to litigate the non-settling bondholders' administrative expense claim for PREPA's alleged misuse of net revenues; and
 - Permit the FOMB to litigate its objection to the PREPA bond trustee's proof of claim in the Commonwealth's title III case.
 - Judge Swain otherwise extended the litigation stay without setting a date for its termination and denied the non-settling bondholders' pending motion to lift the title III stay.
- On March 26, 2025, the U.S. Supreme Court extended to May 30, 2025, AAFAP's time in which to file a petition for certiorari of the First Circuit's decisions regarding the bondholders' secured claim.
- On March 28, 2025, the FOMB filed a fifth amended plan of adjustment for PREPA and an amended disclosure statement describing the plan. The proposed plan of adjustment contemplates \$2.6 billion in base consideration to be provided from "non-PREPA sources" and eliminates the previously proposed legacy charge but allows PREPA to issue up to \$2.6 billion of bonds, repayable from PREPA's net revenues.
- Since June 17, 2024, the parties have been participating in court-ordered mediation. The litigation stay period has been extended several times, most recently without an end date (except as specifically modified in an order entered on March 20, 2025), and the appointment of the lead mediator has been extended to October 1, 2025.

Net Energy Metering

- In compliance with the current regulation of distributed generation interconnection, LUMA successfully completed an additional 1,433 supplemental studies in March 2025. The studies cover distribution feeder voltage, thermal, and protection analyses, which are critical to maintaining the distributed system's stability and reliability. As of March 31st, all feeders with penetration levels above fifteen percent (15%) have been studied. Through this process, LUMA has identified the required system upgrades. LUMA is currently in the process of preparing the cost and timeline information to share with the developers. LUMA is highly concerned about the increasing number of interconnections surpassing the pace of comprehensive studies, which

poses a systemic reliability risk. LUMA has engaged in discussions with distributed generation developers and installers to secure payments for required supplemental studies.

LUMA's Billing and Collection Efforts

- During March 2025, LUMA continued to make progress on critical Customer Care and Billing System ("CC&B") through its System Remediation Plan ("SRP") initiatives, including User Roles & Functions (100% complete), Letter Automation (98% complete) and CELI/Streetlight balance cleanup (75% complete).
- LUMA identified an additional \$140M in critical CC&B data cleanup and plans to execute the write-off in April 2025. Additional phases of this critical data cleanup will continue throughout the remainder of FY25 and into FY26.
- LUMA reached 3,801 new payment agreements with customers in March 2025, for a total of over 113,734 agreements since June 2021. Also, in March LUMA completed over 291,000 outbound collection calls for a total of over 3.7 million outbound calls since June 2021. LUMA's Revenue Protection team collected over \$36 million in March 2025 directly related to active customer collections of past due receivables. Collection efforts included outbound calls, letters, emails and inbound calls.
- Customers in danger of defaulting on payment arrangements have increased from 14% in March 2024 to 22% in March 2025.