

January 11th, 2022

To: Puerto Rico Public-Private Partnerships Authority

Attention: Sheila Torres Sterling
Roberto Sanchez Vilella (Minillas) Government Center
De Diego Ave. Stop 22,
San Juan, PR 00907

Re: RFI 0013 Response

In response to RFI 0013 sent by P3A on December 15th, 2021, LUMA is providing information regarding LUMA's plans for pole and pole attachment installation in Puerto Rico.

In compliance with local and federal law, telecommunications companies will sometimes use electric power poles to place telecommunications equipment (referred to as "joint use"). Additionally, telecommunications companies may legally install poles for their own use and are responsible for the maintenance of their poles.

Before commencing operation of the Transmission & Distribution (T&D) system on June 1, 2021, LUMA conducted an assessment that revealed PREPA did not have an existing inventory of telecommunication pole attachments and was not currently documenting third-party installation and repairs activity. To address this gap and as part of the System Remediation Plan (SRP), LUMA created the Update to Third Party Use, Audit, Contract and Billing Procedures program (part of the Support Services Portfolio). This program includes activities to identify all existing third-party pole attachments, establish processes for a joint use agreement that would apply to attachments, and implement changes to the Customer Care & Billing System to incorporate billing of attachments.

Given the lack of reliable data and the scale of this undertaking, LUMA anticipates the program will take several years to complete. To accomplish this, LUMA has been working with the Energy Bureau, the Regulatory Board of Public Service and Negotiated Telecommunications (NET), PREPA, and telecommunications companies. So far, the effort has enabled LUMA to begin developing engineering standards and necessary processes for administration of pole attachments. This effort includes establishing standards for the use of replacement poles and ensuring that the rights and responsibilities of telecommunications companies are properly registered and documented.

LUMA is in the procurement process to contract the Preliminary Engineering Data Collection effort, which is an essential part of the SRP and will inform the inventory of existing third party attachments. Throughout this effort, LUMA has been coordinating directly with municipalities, regulators, and telecommunications companies to ensure transparency around LUMA's work.



The process for replacing a pole can vary depending on the type of pole, location and parties involved. As needed, LUMA coordinates repairs and replacement of these poles with the telecommunications companies, removes discarded poles, and disposes of the poles in accordance with applicable laws and regulations. LUMA also coordinates with telecommunications companies when poles are removed and new poles are installed, but telecommunications companies are responsible for placing equipment on the new poles. If equipment from a third party threatens the physical integrity of an electric utility pole or creates a safety concern, LUMA will take necessary and appropriate action to protect LUMA's customers and the public.

LUMA has already completed significant upgrades to critical local infrastructure, including the replacement of more than 1,800 power poles and dozens of critical distribution breakers to reduce the likelihood of future outages. LUMA will continue replacing damaged poles and increasing the reliability and resiliency of the T&D system for the people of Puerto Rico. LUMA will work with affected stakeholders, including telecommunications companies that have pole attachments, to communicate plans and coordinate efforts.

Sincerely,

LUMA Energy LLC



Ashley Engbloom

Vice President, Regulatory

