



GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC-PRIVATE PARTNERSHIPS AUTHORITY

July 9, 2021

LUMA Energy, LLC

644 Fernández Juncos Ave., Suite 301
San Juan, PR 00907
Attention: General Counsel
Email: legal@lumamc.com

with copy to:

LUMA Energy, LLC

644 Fernández Juncos Ave., Suite 301
San Juan, PR 00907
Attention: President/CEO
Email: wayne.stensby@lumamc.com

Re: Request for Information

Ladies and Gentlemen:

Reference is made to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020 (the “O&M Agreement”) among (a) the Puerto Rico Electric Power Authority (“PREPA”), a public corporation and governmental instrumentality of the Commonwealth of Puerto Rico, created by Act No. 83 of the Legislative Assembly of Puerto Rico, enacted on May 2, 1941, (b) the Puerto Rico Public-Private Partnerships Authority (“P3 Authority”), a public corporation of the Commonwealth of Puerto Rico, created by Act No. 29 of the Legislative Assembly of Puerto Rico, enacted on June 8, 2009, (c) LUMA Energy, LLC (“ManagementCo”), a limited liability company organized under the laws of Puerto Rico and (d) LUMA Energy ServCo, LLC (“ServCo” and, together with ManagementCo, “LUMA”), a limited liability company organized under the laws of Puerto Rico.¹

It is well known that both the Government of Puerto Rico and the Federal Government, including the Federal Emergency Management Agency, expect procurement transactions to be carried out in a transparent manner, at arm's length, impartially and without preferential treatment.² Consequently, non-Federal entities

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the O&M Agreement or LUMA's Procurement Manual unless otherwise specified.

² Please see Chapter 3, Section 3.1 (B) of FEMA's *Field Manual Procurement Disaster Assistance Team (PDAT) Procurement Information for FEMA Public Assistance Award Recipients and Subrecipients*.

are required to have and use written standards of conduct covering conflicts of interests.³ Therefore, pursuant to Section 6.2 (vi) of the O&M Agreement, the P3 Authority requests all of LUMA's written standards covering conflicts of interest and unfair advantages that may arise from any type of procurement conducted by LUMA, including but not limited to:

1. LUMA's Vendor Code of Conduct
2. LUMA's Anti-Corruption Policy
3. LUMA's Conflict of Interest Policy
4. LUMA's Procurement & Contracting Practice
5. Written standards of conduct covering conflicts of interest and governing the actions of employees, officers, or agents of LUMA engaged in the selection, award, and administration of Contracts
6. Written standards of conduct covering organizational conflicts of interest
7. Written standards of conduct covering conflicts of interest and governing the actions of Vendors and contracting parties
8. Any other related document.

The P3 Authority also requests:

9. A detailed list of **all** of Quanta Services, Inc. subsidiaries, affiliates, and related entities. Please provide with this list a brief description of the services or goods provided by each entity and the related procurement category, pursuant to and in accordance with LUMA's Procurement Manual.
10. A detailed list of **all** of Canadian Utilities Limited subsidiaries, affiliates, and related entities. Please provide with this list a brief description of the services or goods provided by each entity and the related procurement category, pursuant to and in accordance with LUMA's Procurement Manual.

The P3 Authority kindly requests the submission of an updated version of items 9 and 10 every ninety (90) days. Please address all requested information to administrator@p3.pr.gov.

Sincerely,



Fermín E. Fontanés Gómez
Executive Director
Puerto Rico Public-Private Partnerships Authority

³ 2 CFR 200.318 (c).