

June 24, 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: Response to P3A Request for Information (RFI) #0015

Pursuant to Section 9.3 of 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”), LUMA is in compliance with the requirements regarding the practice of engineering, architecture and other related professions in the Commonwealth. Please see below for information in response to the specific matters addressed in P3A RFI #0015, received by LUMA on June 2, 2022.

In regard to LUMA’s position regarding the allegations included in the media reports, related to LUMA’s employees and the practice of engineering, LUMA’s position is that said allegations are misleading and that the information regarding LUMA’s employees, especially those that practice the profession of engineers, has been manipulated to hurt the company and its employees.

In order to address the allegations head on, and to address the agency referrals for 10 positions that occurred because of the wrongful allegations, LUMA conducted an internal compliance assessment to confirm educational, licensing, and supervisory requirements for the positions that require engineering license or that require supervision by a Professional Engineer which found overall compliance with Puerto Rico Law and allowed LUMA to implement mitigating actions for any minor deviation, if any. LUMA also continues to review the organization to safeguard compliance.

While LUMA does in fact, have many employees with background education in engineering, including several PhDs, not all of them are assigned to job positions that entail performing functions that would require holding a Professional Engineer License or to be an Engineer in Training. Therefore, only those employees that perform work directly related to the duties and responsibilities of an engineer need to comply with the regulations that govern the profession of engineering.

For example, a District Manager, can have an engineering background, but does not perform engineering duties that fall within the scope of the applicable regulations. Furthermore, the engineering profession has categories, allowing for individuals who are not Professional Engineers to be supervised by a licensed engineer. For example, an engineer in training can perform engineering work if supervised by a Professional Engineer.

A copy of these job descriptions was provided to the House of Representatives on May 26, 2022. These documents also show LUMA’s jobs positions where a degree in engineering is not a requisite but is desired or accepted as educational background. LUMA also informed the House of



Representatives on May 26, 2022, that all those employees whose job positions involves performance of architectural, engineering, land surveying and landscape architecture are compliant with all applicable dispositions under Act 173 of August 12, 1988, as amended.

LUMA prides itself in having a world-class team of employees with engineering knowledge that work daily to create a safer and efficient grid. We will work with the relevant agencies and with the Puerto Rico College of Engineers to finalize the referrals while continuing the focus on the necessary work to restore Puerto Rico's energy grid.

Should P3A have any questions, please do not hesitate to reach out.

Sincerely,

Aleksi Paaso

Aleksi Paaso, Ph.D.

VP, Distribution Engineering and Investment Strategy

