



LUMA's Response to P3A's RFI on Jayuya Substation Fire

P3A-RFI-2022-0016

July 21, 2022

Request for Information

QUESTION 1

State LUMA's position in connection with the following statement:

On July 12, 2022, around 5:50 am a fire occurred in a Jayuya substation. It has come to our attention that the Fire Bureau could not enter the premises because the substation was electrified and no LUMA personnel was present. The P3 Authority was informed that LUMA personnel arrived to the substation more than one (1) hour after the initial report.

RESPONSE

Due to the safety requirements for entering a substation, LUMA adheres to strict protocols for responding to a substation emergency, such as a fire, to ensure the safety of First Responders and the public. Please see LUMA's response to Question #2 for additional detail on these protocols.

On July 12, 2022, at 5:50 AM, LUMA was notified of a fire at the Jayuya substation. This substation is not normally manned and typically there are not personnel at the substation. In compliance with established protocols, LUMA immediately dispatched qualified LUMA personnel to the substation to ensure the substation equipment was deenergized before First Responders entered the locked substation premises. Given the remote location of the Jayuya substation, qualified LUMA personnel were dispatched from the Arecibo office. The arrival time of qualified LUMA personnel was appropriate given the distance from the Arecibo office to the remote location of the Jayuya substation. The First Responders acted in compliance with the established protocols to ensure safety and did not attempt to enter the premises to commence actions to extinguish the fire until the equipment was deenergized. Please reference the Initial Report provided in response to Question #3 for additional detail on the timeline of events. LUMA is committed to continuing to improve our processes to reduce response time.

For P3A's awareness, the Jayuya substation has known issues that LUMA is actively working to address and modernize. To do this, LUMA has a proposed FEMA project for the Jayuya substation, and the detailed scope of work is awaiting FEMA's approval.

QUESTION 2

Inform the P3 Authority of the measures and the applicable protocols in place to ensure First Responders are able to timely access LUMA operated facilities during an emergency.

RESPONSE

Substations are identified in LUMA's protocols as a Bulk Electric System (BES) facility. Work on or near a power system (BES) involves inherent risks and strict adherence to work standards, procedures, and methods to minimize these risks is critical. LUMA Check-In-Check-Out Substations Procedure was developed to complement and support safety standards for all employees working on or near a LUMA BES site. This procedure requires that only employees with the adequate training, knowledge and skills can perform work on a BES site, after obtaining permission from the Operator-in Charge (OIC).

For safety reasons, substations have a surrounding fence to restrict public access and protect against possible hazards. During an emergency First Responders do not have access to substation premises until a qualified LUMA employee arrives and completes the necessary action to deenergize the electrical

equipment in coordination with the Operations Control Center. It is very unsafe for First Responders to enter the substation premises and begin suppressing the fire while the substation is electrified.

LUMA has established measures and protocols to ensure First Responders are able to gain timely and safe access to LUMA operated facilities during an emergency. After a substation fire is detected and an emergency call is made to dispatch, LUMA protocol is to immediately dispatch a crew to the site with the specific qualifications required to enter a substation. Once the qualified crew arrives, they will complete actions required to deenergize the equipment before First Responders begin actions to suppress the fire. This protocol is documented in LUMA's "Check-In Check-Out Substations Procedure", as part of LUMA's Physical Security Plan filed with the Puerto Rico Energy Bureau on December 8, 2021, under docket NEPR-MI-2020-0018. LUMA has provided P3A with access to this procedure for reference. Please be advised this is sealed under confidentiality with the Puerto Rico Energy Bureau.

LUMA continues to focus on continuous improvements to its measures and protocols. As an example, LUMA's Department of Health, Safety, Environmental Quality, Crisis Management and Public Safety (HSEQ) has the Public Safety Program to promote and educate the public on electrical safety. First Responders, such as firefighters, police, emergency managers and paramedics, are among the target audience. The objective is to provide First Responders with the knowledge to perform any activity near power lines safely and to train them on techniques for emergencies involving power lines. At this stage, LUMA has prepared the training and is in the process of drafting a collaborative agreement with the Department of Public Safety to deliver the electrical safety training to First Responders. LUMA expects to have the collaborative agreement signed in August 2022.

LUMA's highest priority is the safety, health and wellbeing of our customers, communities and our more than 3,000 coworkers.

QUESTION 3

Provide the P3 Authority with a detailed report of what caused the fire.

RESPONSE

Please reference the attached Initial Report, which was filed with the Puerto Rico Energy Bureau under docket [NEPR-IN-2022-0003](#) on July 21, 2022, in response to the Resolution and Order issued by the Energy Bureau on July 13, 2022.