

**GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR

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IN RE:

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY'S 10
YEAR INFRASTRUCTURE PLAN-
DECEMBER 2020

CASE NO. NEPR-MI-2021-0002

SUBJECT: Motion Submitting September 2021
Update to 90 Day Plan

**MOTION SUBMITTING SEPTEMBER 2021 UPDATE TO PREPA-LUMA 90 DAY
PLAN**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”)¹, and **LUMA Energy ServCo, LLC** (“ServCo”)², (jointly referred to as “LUMA”) and the **Puerto Rico Electric Power Authority** (“PREPA”), through their respective undersigned legal counsel and respectfully submit the following:

1. On December 30, 2021, PREPA filed with this Puerto Rico Energy Bureau (“Energy Bureau”) the 10-Year Infrastructure Plan that it had submitted to the Federal Emergency Management Agency (“FEMA”). *See* Case No. NEPR-MI-2020-0016.

2. On January 25, 2021, the Energy Bureau issued a Resolution and Order (“January 25th Order”) holding that the 10-year Infrastructure Plan must comply with the approved Integrated Resource Plan and Modified Action Plan in Case No. CEPR-AP-2018-0001³ (“Approved IRP and

¹ Register No. 439372.

² Register No. 439373.

³ Both as approved by Final Resolution and Order issued by the Energy Bureau on August 24, 2020 in Case No. CEPR-AP-2018-0001, *In Re: Review of the Integrated Resources Plan of the Puerto Rico Electric Power Authority*.

Modified Action Plan”). In compliance with the January 25 Order, on February 16, 2021, PREPA filed a revised 10-Year Infrastructure Plan (*see PREPA’s Response to Resolution and Order Entered on January 25, 2021 and Request for Approval of Revised 10-Year Infrastructure Plan* filed on that date), and subsequently, on March 19, 2021 submitted another revised 10-Year Infrastructure Plan (*see PREPA’s Motion Submitting Revised 10-Year Infrastructure Plan* filed on that date).

3. On March 26, 2021, this honorable Energy Bureau issued a Resolution and Order (“March 26th Order”) making certain determinations regarding the alignment of the 10-Year Infrastructure Plan, as revised as of that date, with the Approved IRP and Modified Action Plan. In the March 26th Order, the Energy Bureau, in pertinent part and among others, also required PREPA to “continue reporting to the Energy Bureau and FEMA, within the next five (5) years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau.” March 26th Order at p. 19.

4. After other procedural incidents, on June 15, 2021, LUMA requested this Energy Bureau to convene a Technical Workshop to discuss the future processes on projects to be submitted to FEMA and the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR-3”), and the timing and review of filings. *See LUMA’s Motion in Compliance with June 8th Resolution and Order and Request for Technical Workshop* (“June 15th LUMA Motion”) at p. 3. The Energy Bureau granted this request by convening a Technical Conference for July 21, 2021. *See Energy Bureau’s Resolution and Order of July 2, 2021.*

5. On July 6, 2021, in compliance with that portion of the Energy Bureau’s March 26 Order that requested continued reporting on the status of infrastructure projects, PREPA and

LUMA jointly filed an updated 10-Year Infrastructure Plan and a PREPA-LUMA supplement to the 10-Year Infrastructure Plan providing a summary of key next steps for the upcoming 90 days (“Supplemental 90-Day Plan”). *See Joint Motion Submitting Updated 10-Year Infrastructure Work Plan* of that date at p. 3.

6. On July 12, 2021, LUMA staff appeared at the Virtual Technical Conference and gave a presentation (“Presentation”)⁴ describing the process for the review, approval and oversight of activities related to federally funded T&D projects by the Energy Bureau, COR-3 and FEMA, the associated reporting requirements and estimated submittal timelines. *See Presentation* at p. 3.

7. LUMA submitted a revised version of this Presentation on July 15, 2021 (*see Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed During the Technical Conference* (“July 15 Motion”). In said Motion, LUMA restated the main subjects of its Presentation and requested this Energy Bureau to confirm acceptance of the matters proposed therein. Among the matters discussed in the Presentation, as restated in the July 15th Motion, LUMA proposed quarterly reporting to be conducted under this docket aligned with the reporting required for federal funding activity in other LUMA dockets⁵ and, as part of the instant docket, to continue to submit to the Energy Bureau updates to the PREPA-LUMA 90-Day Plan for FEMA funding during the last month of every quarter as it is provided to FEMA. *See July 15 Motion* at pp. 8-9.

⁴ This presentation was filed by LUMA with this Energy Bureau on July 9, 2021.

⁵ Specifically, the dockets of the Initial Budgets approved by the Energy Bureau by Resolution and Order of May 31, 2021 in Case No. NEPR-MI-2021-0004 and the System Remediation Plan, approved by this Energy Bureau by Resolution and Order of June 23, 2021 in Case No. NEPR-MI- 2020-0019.

8. Now, in compliance with that portion of the Energy Bureau's March 26th Order that requested continued reporting on the status of infrastructure projects, and as informed in LUMA's July 15 Motion, LUMA and PREPA respectfully submit as **Exhibit 1** to this Motion, the PREPA-LUMA 90-Day Plan for September 2021 ("September 2021 90-Day Plan") providing a summary of key next steps for the upcoming ninety (90) days.

9. Section II of the September 2021 90-Day Plan contains an overview of the focus areas for the next ninety (90) days while Sections III and IV of this Plan contains estimated schedules for submission of detailed Scopes of Work to COR3 & FEMA, by PREPA and LUMA, respectively. *See* Exhibit 1 at pp. 3-10.

10. It is respectfully informed that going forward, LUMA and PREPA will continue to file the PREPA-LUMA 90-Day Plan that updates the status of projects but will not be preparing 90-Day updates of the 10-Year Infrastructure Plan itself. LUMA reaffirmed with FEMA that the only requirement from FEMA is a 90-Day Plan update.

11. As Exhibit 2 to this Motion, LUMA and PREPA are submitting a redline version that compares the PREPA-LUMA 90-Day Plan that was filed on July 6, 2021 with the update being submitted today of September, 2021.

WHEREFORE, LUMA and PREPA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the September 2021 Update to the PREPA-LUMA Supplemental 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 21st day of September 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau.



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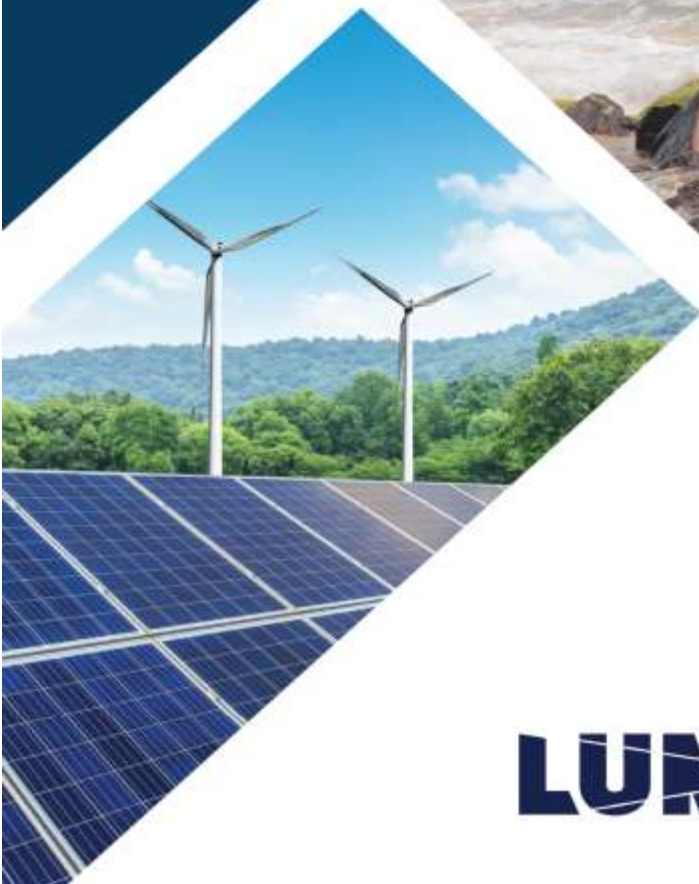
Counsel for PREPA

Exhibit 1

PREPA-LUMA September 2021 90-Day Plan



FEMA



PREPA-LUMA 90-Day Plan

September 2021



Puerto Rico Electric
Power Authority



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I. Introduction

In accordance with the directive received from FEMA to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for PREPA's T&D System as outlined within the O&M Agreement (OMA) between PREPA, P3A, and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and are now the responsibility of LUMA.

This 90-Day Plan provides information on areas of coordination between PREPA and LUMA as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90 Days

The content below summarizes next steps across the following six areas: 1) PREPA-LUMA Coordination and Alignment; 2) Federal Grant Management; 3) Funding and Reporting; 4) Environmental and Historic Preservation; 5) Engineering Management; and 6) Enterprise Project Management ("EPM").

PREPA-LUMA Coordination and Alignment

PREPA and LUMA Focus Areas

- PREPA and LUMA executive leadership continue with regular meetings to coordinate on investment decisions, and to identify and resolve risks that involve points of integration between the two entities
- PREPA and LUMA will continue coordination to support successful operations under the OMA

Federal Grant Management

PREPA Focus Areas

- Submitted 20 projects to the PREB for approval in the last 90-day period, representing \$1.50 billion¹ in infrastructure investments
 - 14 of the 20 projects were approved by the PREB and submitted to COR3 and FEMA to establish FEMA project numbers (\$1.38 billion in investments)

¹ Value does not match subcomponent total exactly due to rounding



- Six (6) projects were still under PREB review at the time of this 90-Day Plan submission (\$0.13 billion in investments)
- Submit a set of reimbursement projects to the PREB in the next 90-day period for completed plant repairs
- Develop application package for the new “Hydroelectric Turbines Fleet” project that includes approximately \$300M in infrastructure investments; project is a candidate for funding through the HUD Community Development Block Grant – Direct Assistance (CDBG-DR) program
- Develop an amendment to the \$280M Emergency Generation 404 program-funded project that includes investing approximately \$100M in retrofitting existing simple cycle units island-wide
- Complete EHP evaluation on Demi-Tank projects corrective action to release funding for Mega-Gens (approximately \$58M)
- Continue evaluation of capital investment opportunities within CDBG-DR for unmet needs
- Submit narrative and budget for HMGP Management Cost 5% obligation (approximately \$75M)

LUMA Focus Areas

- Defined LUMA’s Federal Funding submittal process and templates for submitting *Initial Scopes of Work* (SOW) to COR3 and FEMA for review that meets COR3 and FEMA requirements and standards. This process includes the requirement to submit to PREB for approval prior to submitting to COR3 and FEMA.
- Presented the new Federal Funding submittal process to PREB. LUMA has started using the new submittal process and templates to submit to PREB, COR3, and FEMA
- Submitted 57 *Initial SOWs* to the PREB for approval in the last 90-day period, representing \$5.79 billion² in capital investments:
 - 28 of which were approved by the PREB and then submitted to COR3 and FEMA to establish a FEMA project number (\$1.8 billion in investments)
 - 29 of which are still under PREB review at the time of this 90-Day Plan submission (\$3.8 billion in investments)
- LUMA is in the process of developing another ~45 *Initial SOWs* and plans to submit them to the PREB for approval in the next 90-day period
- Submit the *Detailed SOW* (including 406 Hazard Mitigation & EHP requirements) for the Cataño Modernization and Hardening project to COR3

² Value does not match subcomponent total exactly due to rounding



and FEMA for review and approval early in the next 90-day period with intent to working through key COR3/FEMA processes to help facilitate future project submissions and execution

- Continue advancing work on other 428 projects towards finalizing *Detailed SOWs* for submission to COR3 and FEMA. This effort will include 406 Hazard Mitigation and EHP work.
- Continue to work on opportunities for potential additional funding afforded by the 404 Hazard Mitigation Grant Program and the Community Development Block Grant (CDBG-DR) Program. LUMA has identified four key projects representing ~\$900M to date. This work will involve working closely with COR3, Vivienda and FEMA.
- Continue to work with the representatives from COR3 and FEMA on key issues identified to date and identified as the work progresses

Funding and Reporting

PREPA Focus Areas

- Pursue request for advance on A/E contracts previously submitted (\$7.10M)
- Submit request for reimbursement on Mega-Gens FAAS PW180692, after funds are obligated
- Request amendment to Management Cost PW 1294 to include contracts awarded for grant management and program management activities by LUMA and PREPA, to obtain adequate funding
- Submit progress and financial quarterly reports for period ending 9/30/2021 on all 428 and 404-obligated projects

LUMA Focus Areas

- Continue tracking project actual costs in accordance with FEMA and COR3 standards to support financial reporting requirements for federally funded projects.
- Establish structure and reports to support development of FEMA-required financial reporting in preparation for submitting the FEMA-funded projects progress and financial quarterly reports during future periods

Environmental and Historic Preservation

PREPA Focus Areas

- Develop project scoping doc per EHP request
- Provide support to EHP State Historic Preservation Office (“SHPO”) programmatic agreement development



- Respond to EHP data requests for the revised Engineering Services Agreement
- Support review of RFPs to ensure EHP requirements are incorporated
- Review near-term projects as they develop to identify EHP requirements
- Work to ensure public notification program meets FAASt and EHP requirements

LUMA Focus Areas

- Design the EHP scoping requirements and formal templates to be included in the *Detailed SOW* packages and review with COR3 and FEMA for alignment
- LUMA's Environmental, Land, and Permits team is coordinating with FEMA's EHP group on the details related to the Cataño Modernization and Hardening project. As noted above, this project is the 'lead' project that will provide the opportunity to work through key processes and establish a strong understanding of COR3/FEMA requirements
- Continue ongoing weekly meeting between the LUMA and FEMA EHP teams on all identified projects

Engineering Management

PREPA Focus Areas

- Awarded one (1) project to an A/E vendor to begin preliminary A/E design over the last 90-day period, representing \$19.84M in infrastructure investments (PREPA had previously awarded two (2) projects to A/E design vendors, representing \$50.20M in investments)
- Assign another 16 projects to A/E design firms to begin A/E design work in the next 90-day period (\$1.43 billion in investments)
- Review and assess as-found documentation
- Track and review engineering standards
- Continue to review and finalize Design Criteria Documents ("DCDs") for applicable asset groups
- Commence formation of construction specifications for applicable asset categories and work with program stakeholders on review and approval

LUMA Focus Areas

- Assigned 33 PREB-approved projects to A/E firms in the last 90-day period, representing \$0.9 billion in infrastructure investments
- Recently published an RFP seeking additional A/E resources to support the federally funded projects and expects the RFP process to be completed within the next 90 days



- Expect to assign the 28 projects recently approved by the PREB to A/E firms to begin A/E design work. Note that there are another 29 projects currently under PREB review that are expected to be submitted to COR3/FEMA for project numbers.
- Continue the development of near-term needs for T&D assets and begin *Initial* SOW development

Enterprise Project Management (“EPM”)

PREPA Focus Areas

- Continue managing project schedules, tasks, budgets, and progress in PREPA’s system of record, MS Project Online
- Continue refining project management controls and artifacts aligned with federal requirements
- Monitor and manage implementation progress through the EPM program

LUMA Focus Areas

- Continue to ramp-up project management resources, systems, and processes related to the execution of project within the infrastructure plan and continue to monitor resource needs as additional projects are launched
- Continue to track and monitor project schedules and costs within the EPM System leveraging the quality controls developed by LUMA
- Define and design federal program reporting based on federal requirements

III. PREPA Estimated Schedule for Submission of Detailed SOWs

Over the next 90 days, PREPA will be focused on preparing and submitting generation projects to the PREB for approval prior to submission to COR3 and FEMA in the fourth quarter of 2021. The table below shows the current set of projects estimated to have *Detailed* SOWs submitted to COR3 and FEMA in the fourth quarter of 2021, all of which are Generation projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

Table 1.1 – PREPA 2021 Q4 Project Submittal Milestone

#	Project Name	Asset Category
2021 Q4 – Milestone: Submit Project to COR3 and FEMA for Review		
1	New Black Start System at Costa Sur	



#	Project Name	Asset Category
2	Reimbursement – Aguirre Steam Plant Repairs (Damages from Hurricanes - Federal Funded)	Generation
3	Reimbursement – Palo Seco Steam Plant Repairs (Damages from Hurricanes - Federal Funded)	
4	Reimbursement – Jobos Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
5	Reimbursement – Vega Baja Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
6	Reimbursement – San Juan Steam Plant Repairs (Damages from Hurricanes - Federal Funded)	
7	Reimbursement – Mayaguez Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
8	Reimbursement – Dagua Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
9	Reimbursement – Yabucoa Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	

IV. LUMA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, LUMA will be focused on preparing *Detailed SOW* and cost estimates for T&D projects that currently have both PREB approval and FEMA project numbers. The table below shows the current set of projects in this group along with the estimated timing for *Detailed SOWs* submittals to COR3 and FEMA.

The estimation of project submission timing noted below is based on the best information available to LUMA at the time of this plan update. LUMA is focused on meeting or exceeding the project submission estimates listed in the table below.

Table 1.2 – LUMA Projects Being Prepared for *Detailed SOW* Submission

#	FEMA Project #	Project Name	Submission Estimate	Asset Category
1	174422	FAASt - Catano-Rebuild 1801(Substation)	2021 Q4	Substation
2	168226	FAASt San Juan 115kV Underground Transmission Loop (Transmission)	2022 Q1	Transmission
3	176971	FAASt – Line 8200 - San Juan SP to Catano Sect Line (Transmission)		
4	176954	FAASt Garzas 1 HP to Garzas 2 HP - Line 1100 (Transmission)		



#	FEMA Project #	Project Name	Submission Estimate	Asset Category
5	180052	FAASt Ponce TC to Jobos TC - 100 & 200 (Transmission)		
6	166904	FAASt Transmission Line 37800 Caguas TC to Monacillos TC (Transmission)		
7	177134	FAASt Guaraguao TC to Comerio TC Line-4100 (Transmission)		
8	165209	FAASt-Substation 3801 Culebra (Substation)		Substation
9	165225	FAASt-Substation 2501 Vieques (Substation)		
10	165268	FAASt Rio Grande Estate Substation CH-2306 (Substation)		
11	178258	FAASt - Taft - MC 1105 (Substation)		
12	169058	FAASt - Llorens Torres MC 1106 - Equipment Repair & Replacement - (Substation)		
13	169266	FAASt Centro Medico 1327/1359 Equipment Repair & Replacement (Substation)		
14	169500	FAASt - Bayamon TC – MC-BKRS-Y1 (Substation)		
15	169896	FAASt - Costa Sur SP TC – Equipment Repair and Replacement (Substation)		
16	178503	FAASt Aguirre TC - BKRS (Substation)		
17	178577	FAASt Cachete – MC 1526 (Substation)		
18	169495	FAASt - Substations - Tapia GIS Rebuilt - Equipment Repair & Replacement (Substation)		
19	171118	FAASt Caridad Substation – XFMR MC 1714 (Substation)		
20	179558	FAASt - Manatí TC - BRKS 230 kV - (Substation)		
21	169276	FAASt Substation - Viaducto TC - MC 1100 - Equipment Repair & Replacement [Substation]		
22	165213	FAASt – Line 5400 – Rio Blanco HP to Dagua TC to Punta Lima TO to Vieques 2501 to Culebra 3801 (Transmission)	2022 Q2	Transmission
23	176913	FAASt [Palo Seco SP to Catano Sect Line-9500] (Transmission)		
24	180326	FAASt - Line 36800 - Sabana Llana TC to Canovanas TC to Palmer-Fajardo TC (Transmission)		
25	177191	FAASt - Line 39000 - Aguas Buenas TC to Caguas TC (Transmission)		Distribution
26	165226	FAASt – Vieques Feeders 2501-01, 2501-02, 2501-03 and Culebra Feeders 3801-01, 3801-02 (Distribution)		
27	166707	FAASt - Line 51300 - Ponce TC to Costa Sur SP TC (Transmission)	2022 Q3	Transmission



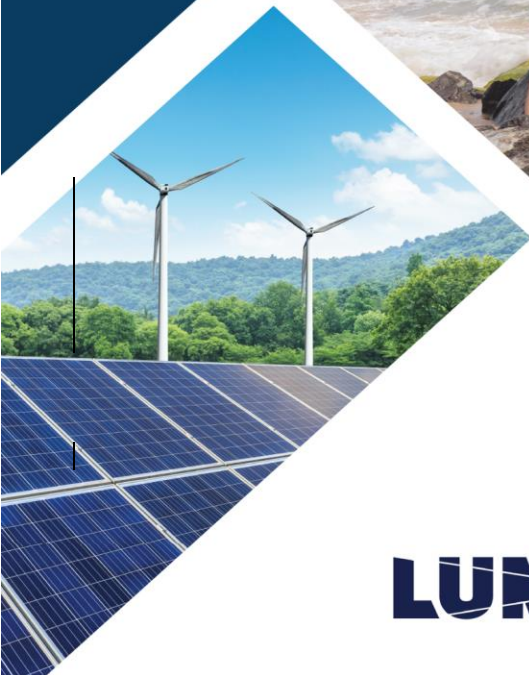
#	FEMA Project #	Project Name	Submission Estimate	Asset Category
28	166860	FAASt-Line 37800 - Jobos TC to Cayey TC & Cayey TC to Caguas TC (Transmission)		Buildings
29	167446	FAASt - Line 36100 - Dos Bocas HP to Monacillos TC (Transmission)		
30	169576	FAASt Arecibo Regional Office Building (Buildings)		
31	169798	FAASt Arecibo Electric Service Center (Buildings)		
32	169804	FAASt Aguadilla Electric Service Center (Buildings)		
33	167168	FAASt Transmission Line 37100 Costa Sur ST - Acacias TC (Transmission)	2022 Q4	Transmission
34	167443	FAASt - Line 36200 - Monacillos TC to Juncos TC (Transmission)		
35	167508	FAASt Transmission - Line 50100 - Cambalache GP TC to Manati TC (Transmission)	2023 Q1	Transmission
36	168483	FAASt - Line 36400 - Dos Bocas HP to Ponce TC (Transmission)	2023 Q2	Transmission
37	165208	FAASt Transmission Access Roads (Environmental)	TBD	Environmental

Exhibit 2

*Redline showing changes from June 2021 PREPA-LUMA 90-Day Plan to PREPA-LUMA
September 2021 90-Day Plan*



FEMA



PREPA-LUMA Supplemental 90-Day Plan

September June 2021 Update



Puerto Rico Electric
Power Authority



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I. Introduction

~~This document is a supplement to the PREPA 10-Year Infrastructure Plan document that provides a summary overview of key next steps to be taken over the next 90 days. Additional detail on the investment strategy, and the full set of infrastructure projects currently included in the project portfolio, can be found in the PREPA 10-Year Infrastructure Plan submission.~~

In accordance with the directive received from FEMA to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for PREPA's T&D System as outlined within the O&M Agreement (OMA) between PREPA, P3A, and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to, and are now the responsibility of LUMA.

~~This version of the Supplemental~~ 90-Day Plan provides information on areas of coordination between PREPA and LUMA as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90 Days

The content below summarizes next steps across the following six areas: 1) PREPA-LUMA Coordination and Alignment; 2) Federal Grant Management; 3) Funding and Reporting; 4) Environmental and Historic Preservation; 5) Engineering Management; and 6) Enterprise Project Management ("EPM").

PREPA-LUMA Coordination and Alignment

PREPA and LUMA Focus Areas

- ~~• Continue~~ PREPA and LUMA executive leadership continue with regular meetings to coordinate on investment decisions, and to identify and resolve risks that involve points of integration between the two entities
- PREPA and LUMA will continue coordination to support a successful transition of T&D operations in alignment with the T&D O&M agreement under the OMA
- ~~• Work together to promote coordination of capital investment plans~~

Federal Grant Management



PREPA Focus Areas

- ~~Ensure PREB review and approval requirements are integrated into the grant management process~~
- ~~Initiate collaborative meeting with FEMA EHP and FEMA 406 on submitted generation projects, specifically Black start PREB-approved projects~~
- ~~Establish governance framework for authorities and approval for grant management transactions; file contact list with Submitted 20 projects to the PREB for approval in the last 90-day period, representing \$1.50 billion¹ in infrastructure investments~~
- ~~14 of the 20 projects were approved by the PREB and submitted to COR3 and FEMA~~
- ~~Establish system access following final delegation of authorities and implement system controls to support subdivisions functions~~
 - ~~Close outstanding RFI's from FEMA on MegaGens to establish FEMA project GM 1680692 and finalize SOW submittal for Demi-Tank corrective action numbers (\$1.38 billion in investments)~~
 - ~~Six (6) projects were still under PREB review at the time of this 90-Day Plan submission (\$0.13 billion in investments)~~
- ~~Submit a set of reimbursement projects to the PREB in the next 90-day period for completed plant repairs~~
- ~~Develop application package for the new "Hydroelectric Turbines Fleet" project that includes approximately \$300M in infrastructure investments; project is a candidate for funding through the HUD Community Development Block Grant – Direct Assistance (CDBG-DR) program~~
- ~~Develop an amendment to the \$280M Emergency Generation 404 program-funded project that includes investing approximately \$100M in retrofitting existing simple cycle units island-wide~~
- ~~Complete EHP evaluation on Demi-Tank projects corrective action to release funding for Mega-Gens (approximately \$58M)~~
- ~~Continue evaluation of capital investment opportunities within CDBG-DR for unmet needs~~
- ~~Submit narrative and budget for HMGP Management Cost 5% obligation (approximately \$75M)~~

LUMA Focus Areas

- ~~Engage COR3 and FEMA to begin the collaboration process as the delegated authority for PREPA on Transmission, Distribution, Substation, Buildings, IT/Telecom, and Environmental assets~~

¹ Value does not match subcomponent total exactly due to rounding



- ~~Define~~Defined LUMA's official Federal Funding submittal process and templates for submitting ~~scopes~~Initial Scopes of work (SOW) to COR3 and FEMA for review that meets COR3 and FEMA requirements and standards. ~~LUMA will ensure COR3 and FEMA approve the process and templates developed prior to using. In the meantime, LUMA will leverage the initial SOW submittal process for review and assignment of FEMA project numbers currently in place and leveraged by PREPA.~~
- Initial Focus—Develop initial SOWs for 57 projects and This process includes the requirement to submit to PREB as required 30 calendar days for approval prior to submitting to COR3 and FEMA for review and FEMA project numbers. LUMA is targeting to file the 57 projects estimated at ~\$1.8 billion with PREB in July/August.
- Second Focus—Develop initial SOWs for 60 projects and Presented the new Federal Funding submittal process to PREB. LUMA has started using the new submittal process and templates to submit to PREB as required 30 calendar days prior to submitting to COR3 and FEMA for review
- Submitted 57 Initial SOWs to the PREB for approval in the last 90-day period, representing \$5.79 billion² in capital investments:
 - 28 of which were approved by the PREB and then submitted to COR3 and FEMA to establish a FEMA project numbers. These 60 number (\$1.8 billion in investments)
 - 29 of which are still under PREB review at the time of this 90-Day Plan submission (\$3.8 billion in investments)
- LUMA is in the process of developing another ~45 Initial SOWs and plans to submit them to the PREB for approval in the next 90-day period
- Submit the Detailed SOW (including 406 Hazard Mitigation & EHP requirements) for the Cataño Modernization and Hardening project SOWs estimated at ~\$1.5 billion to COR3 and FEMA for review and approval early in the next 90-day period with intent to working through key COR3/FEMA processes to help facilitate future project submissions and execution
- Continue advancing work on other 428 projects towards finalizing Detailed SOWs for submission to COR3 and FEMA. This effort will be developed include 406 Hazard Mitigation and filed with PREB after EHP work.
- Continue to work on opportunities for potential additional funding afforded by the initial focus 404 Hazard Mitigation Grant Program and the Community Development Block Grant (CDBG-DR) Program. LUMA has identified four key

² Value does not match subcomponent total exactly due to rounding



projects ~~are completed~~ representing ~\$900M to date. This work will involve working closely with COR3, Vivienda and FEMA.

- Continue to work with the representatives from COR3 and FEMA on key issues identified to date and identified as the work progresses

Funding and Reporting

PREPA Focus Areas

- ~~Streamline A/E spend plan to legacy assets to support an advance on A/E funds for permanent projects, send COR3 procurement packages for review, and establish quarterly payment schedules~~
- Pursue request for advance on A/E contracts previously submitted (\$7.10M)
- Submit request for reimbursement on Mega-Gens FAAS PW180692, after funds are obligated
- Request amendment to Management Cost PW 1294 to include contracts awarded for grant management and program management activities, by LUMA and PREPA, to obtain adequate funding
- Submit progress and financial quarterly reports for period ending ~~06/30/2021~~ on all 428 and 404-obligated projects

LUMA Focus Areas

- ~~Set up financial project numbers and cost structures within LUMA financial systems for FEMA-funded projects transferred to LUMA from PREPA~~
- ~~Begin~~Continue tracking project actual costs in accordance with FEMA and COR3 standards to support financial reporting requirements for federally-funded projects.
- Establish structure and reports to support development of FEMA-required financial reporting in preparation for submitting the FEMA-funded projects progress and financial quarterly reports during future periods

Environmental and Historic Preservation

~~PREPA and LUMA~~ Focus Areas

- Develop project scoping doc per EHP request
- Provide support to EHP State Historic Preservation Office ("SHPO") programmatic agreement development
- Respond to EHP data requests for the revised Engineering Services Agreement
- Support review of RFPs to ensure EHP requirements are incorporated
- Review near-term projects as they develop to identify EHP requirements



- Work to ensure public notification program meets ~~FAAST~~[FAAST](#) and EHP requirements

LUMA Focus Areas

- [Design the EHP scoping requirements and formal templates to be included in the Detailed SOW packages and review with COR3 and FEMA for alignment](#)
- [LUMA's Environmental, Land, and Permits team is coordinating with FEMA's EHP group on the details related to the Cataño Modernization and Hardening project. As noted above, this project is the 'lead' project that will provide the opportunity to work through key processes and establish a strong understanding of COR3/FEMA requirements](#)
- [Continue ongoing weekly meeting between the LUMA and FEMA EHP teams on all identified projects](#)

Engineering Management

PREPA Focus Areas

- ~~Award PREB-approved generation projects with FEMA numbers to A/E vendors to begin 30% design work~~
- [Awarded one \(1\) project to an A/E vendor to begin preliminary A/E design over the last 90-day period, representing \\$19.84M in infrastructure investments \(PREPA had previously awarded two \(2\) projects to A/E design vendors, representing \\$50.20M in investments\)](#)
- [Assign another 16 projects to A/E design firms to begin A/E design work in the next 90-day period \(\\$1.43 billion in investments\)](#)
- Review and assess as-found documentation
- Track and review engineering standards
- Continue to review and finalize Design Criteria Documents ("DCDs") for applicable asset groups
- Commence formation of construction specifications for applicable asset categories and work with program stakeholders on review and approval

LUMA Focus Areas

- ~~Assign A/E firms to the 37 Assigned 33 PREB-approved projects estimated at \$990M that have FEMA project numbers to A/E firms in the last 90-day period, representing \$0.9 billion in infrastructure investments~~
- ~~Cataño Modernization and Hardening Project (Recently published an RFP seeking additional A/E resources to support Substation & D-Line) estimated at \$11M is the most advanced project and preliminary engineering federally~~



funded projects and expects the RFP process to be completed within the next 90 days

- Expect to assign the 28 projects recently approved by the PREB to A/E firms to begin A/E design will work. Note that there are another 29 projects currently under PREB review that are expected to be submitted to COR3/FEMA in July for project numbers.
 - Next four (4) Projects: Expected engineering work will be assigned to A&E firms by end of June. These projects are estimated at \$105.2M
 - Next 32: Expected engineering scope of work will be assigned to A&E firms over the next two months
- Focus on the scopeContinue the development of near-term needs for T&D assets and continue to select and define near-term projects from LUMA's investment plan to begin initialbegin Initial SOW development

Enterprise Project Management ("EPM")

PREPA Focus Areas

- Continue updating and refiningmanaging project schedules, tasks, budgets, and progress in PREPA's system of record, MS Project Online
- Continue supporting the transition of T&D projects to LUMA's instance of MS Project Online and close out transitioned projects in PREPA's instance of MS Project Online
- Continue refining project management controls and artifacts aligned with federal requirements
- Update MS Power BI reporting dashboards to focus on GenCo scope
- Monitor and manage implementation progress through the EPM program

LUMA Focus Areas

LUMA Focus Areas

- Continue to make progress on ramping ramp-up project management resources, systems, and processes related to the execution of project within the infrastructure plan
- Rollout newly designed and implemented EPM Process and System throughout LUMA. Recently, these elements were developed and implemented within LUMA's Capital Programs organization
- Lead and finalize the setup of the continue to monitor resource needs as additional projects that were transitioned to LUMA from PREPA and the newly identified projects into LUMA's system of record, MS Project Online. Note:



~~Projects transferred from PREPA will be closed out within PREPA's EPM System are launched~~

- ~~• Develop and finalize project management controls within LUMA's Quality Management System (QMS) aligned with LUMA's official grant process for submitting scopes of work to COR3 and FEMA based on requirements and standards~~
- ~~• Continue to track and monitor project schedules and costs within the EPM System leveraging the quality controls developed by LUMA~~
- Define and design federal program reporting based on federal requirements
- ~~• Continue integration of federally funded projects into LUMA's EPM program to allow for project management across the entire portfolio, including non-federally funded projects~~

III. PREPA Estimated Schedule for Submission of Detailed SOWs

Over the next 90 days, PREPA will be focused on preparing and submitting generation projects to the PREB for approval prior to submission to COR3 and FEMA in the fourth quarter of 2021. The table below shows the current set of projects estimated to have ~~detailed~~ Detailed SOWs submitted to COR3 and FEMA in the fourth quarter of 2021, all of which are Generation projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update. ~~Additional information on assumptions impacting milestone timing can be found in the PREPA 10-Year Infrastructure Plan.~~

Table 1.1 – PREPA 2021 Q4 Project Submittal Milestone

#	Project Name	Asset Category
2021 Q4 – Milestone: Submit Project to COR3 and FEMA for Review		
<u>1</u>	<u>New Black Start System at Costa Sur</u>	Generation
<u>12</u>	<u>Reimbursement – Aguirre Steam Plant Repairs (Damages from Hurricanes - Federal Funded)</u>	
<u>2</u>	<u>Cambalache Power Plant Repairs (Damages from Hurricanes – Federal Funded)</u>	
<u>3</u>	<u>Reimbursement – Palo Seco Steam Plant Repairs (Damages from Hurricanes - Federal Funded)</u>	
<u>4</u>	<u>Reimbursement – Jobos Gas Plant Repairs (Damages from Hurricanes - Federal Funded)</u>	



#	Project Name	Asset Category
5	Cambalache Dike Reimbursement – Vega Baja Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
6	Reimbursement – San Juan Steam Plant Repairs (Damages from Hurricanes - Federal Funded)	
7	Reimbursement – Mayaguez Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
8	Reimbursement – Daguao Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
9	Reimbursement – Yabucoa Gas Plant Repairs (Damages from Hurricanes - Federal Funded)	
10	Vega Baja Gas Plant Repairs (Damages from Hurricanes – Federal Funded)	

IV. LUMA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, LUMA will be focused on preparing [Detailed SOW](#) and [submitting cost estimates for](#) T&D projects ~~to the that currently have both~~ PREB for approval ~~prior to submission to COR3 and FEMA in the fourth quarter of 2021, as described in the Federal Grant Management section above and in alignment with what LUMA submitted in its initial budgets project numbers.~~ The table below shows the current set of projects [in this group along with the](#) estimated ~~to have detailed timing for Detailed SOWs submitted~~ [submittals](#) to COR3 and FEMA ~~in the fourth quarter of 2021.~~

The estimation of project submission timing [noted below](#) is based on the best information available to LUMA at the time of this plan update. [Additional information LUMA is focused on assumptions impacting milestone timing can be found in the PREPA 10-Year Infrastructure Plan.](#) ~~meeting or exceeding the project submission estimates listed in the table below.~~

**Table 1.2 – LUMA [Projects Being Prepared for Detailed SOW Submission 2021](#)
[Q4 Project Submittal Milestone](#)**

#	FEMA Project #	Project Name	Submission Estimate	Asset Category	Inserted Cells
					Inserted Cells
1	174422	FAASt - Catano-Rebuild 1801(Substation)	2021 Q4 2021 Q4 Milestone: Submit Project to	Substation	Inserted Cells
					Inserted Cells
					Inserted Cells

**PREPA-LUMA Supplemental
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Puerto Rico Electric
Power Authority



FEMA

#	FEMA Project #	Project Name	Submission Estimate	Asset Category	Inserted Cells
			COR3 and FEMA for Review		Inserted Cells
12	Existing 38 kV Line 100 and 200 Ponce TC to Jobos TC 168226	FAAST San Juan 115kV Underground Transmission Loop (Transmission)	2022 Q1	Transmission	Split Cells
23	176971	Existing 115 kV FAAST Line 36800 Palmer Fajardo 8200 - San Juan SP to Sabana Llana Catano Sect Line (Transmission)			Inserted Cells
34	176954	5400 Rio Blanco HP Dagua TC FAAST Garzas 1 HP to Garzas 2 HP - Line 1100 (Transmission)			Inserted Cells
	4	51300 Ponce Costa Sur			
5	180052	37800 FAAST Ponce TC to Jobos Caguas TC - 100 & 200 (Transmission)			Inserted Cells
6	166904	FAAST Transmission Line 37800 Caguas TC to Monacillos TC (Transmission)			Inserted Cells
7	37100 Costa Sur Acacias 177134	FAAST Guaraguao TC to Comerio TC Line-4100 (Transmission)			Split Cells
					Inserted Cells
8	36200 Monacillos Juncos 165209	FAAST-Substation 3801 Culebra (Substation)		Substation	
9	36100 Des Bocas Monacillos 165225	FAAST-Substation 2501 Vieques (Substation)			
	10	50100 Cambalache Manati			
14 10	165268	38000 San Juan Isla FAAST Rio Grande (LOOSE) Estate Substation CH-2306 (Substation)			Inserted Cells
11	178258	FAAST - Taft - MC 1105 (Substation)			Inserted Cells
12	36400 Des Bocas Ponce 169058	FAAST - Llorens Torres MC 1106 - Equipment Repair & Replacement - (Substation)			Split Cells
					Inserted Cells
13	169266	FAAST Centro Medico 1327/1359 Equipment Repair & Replacement (Substation)			Inserted Cells

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Puerto Rico Electric
Power Authority



FEMA

#	FEMA Project #	Project Name	Submission Estimate	Asset Category	Inserted Cells
14	169500	FAAST - Bayamon TC – MC-BKRS-Y1 (Substation)			Inserted Cells
1315	169896	9500 – Palo Seco SP – Catano Sect FAAST - Costa Sur SP TC – Equipment Repair and Replacement (Substation)			Inserted Cells
16	178503	FAAST Aguirre TC - BKRS (Substation)			Inserted Cells
17	178577	FAAST Cachete – MC 1526 (Substation)			
18	169495	FAAST - Substations - Tapia GIS Rebuilt - Equipment Repair & Replacement (Substation)			
19	171118	FAAST Caridad Substation – XFMR MC 1714 (Substation)			
20	179558	FAAST - Manati TC - BRKS 230 kV - (Substation)			
1421	169276	1100 – Garzas 1 HP – Garzas 2 HP FAAST Substation - Viaducto TC - MC 1100 - Equipment Repair & Replacement [Substation]			Inserted Cells
22	165213	FAAST – Line 5400 – Rio Blanco HP to Daguao TC to Punta Lima TO to Vieques 2501 to Culebra 3801 (Transmission)			Inserted Cells
1523	176913	8200 – San Juan FAAST [Palo Seco SP -to Catano Sect Line-9500] (Transmission)			Inserted Cells
14624	180326	4100 – Guarague TC – Comerio TC FAAST - Line 36800 - Sabana Llana TC to Canovanas TC to Palmer-Fajardo TC (Transmission)	2022 Q2	Transmission	
1725	177191	FAAST - Line 39000 - Aguas Buenas -TC to Caguas TC (Transmission)			
14826	165226	Culebra 3801, FAAST – Vieques SubFeeder 2501-01, 2501-02, 2501-03 and Culebra Feeders 3801-01, 3801-02 (Distribution)		Distribution	
	19	Catano Modernization & Hardening			
	20	Rio Grande Estates 2306 (Elevated Control House)			
	24	Tapia GIS 1102 (Rebuilt)			
	22	Horrens Torres 1106 (Metalclad)			
	23	Centro Medico 1 & 2 – 1327 & 1359			
2427	166707	Viaducto TC 1100 (Metalclad) FAAST - Line 51300 - Ponce TC to Costa Sur SP TC (Transmission)	2022 Q3		Inserted Cells
2528	166860	Bayamon TC – BKRS Y1 – 1711 (Metalclad) FAAST-Line 37800 - Jobos TC to Cayey TC & Cayey TC to Caguas TC (Transmission)		Transmiss	Merged Cells
	26	Costa-Sur BKRS P001			Inserted Cells
	27	Caridad 1714 (Metalclad)			Split Cells

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Puerto Rico Electric
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FEMA

#	FEMA Project #	Project Name	Submission Estimate	Asset Category	Inserted Cells
	28	Taft 1105 (Metalclad)			Inserted Cells
29	Aguirre BKR5 T018 167446	FAASt - Line 36100 - Dos Bocas HP to Monacillos TC (Transmission)			Split Cells
	30	Cachete 1526 (Metalclad)			Inserted Cells
	34	MANATI TC BKR - T005			Inserted Cells
	32	Culebra 3801			
	33	Vieques Sub 2501			
3430	169576	FAASt Arecibo Regional Office Building (BuildingBuildings)			Inserted Cells
3531	169798	FAASt Arecibo Electric Service Center (BuildingBuildings)		Building	Inserted Cells
3632	169804	FAASt Aguadilla Electric Service Center (BuildingBuildings)			
33	167168	FAASt Transmission Line 37100 Costa Sur ST - Acacias TC (Transmission)	2022 Q4	Transmission	
34	167443	FAASt - Line 36200 - Monacillos TC to Juncos TC (Transmission)			
35	167508	FAASt Transmission - Line 50100 - Cambalache GP TC to Manati TC (Transmission)	2023 Q1	Transmission	
36	168483	FAASt - Line 36400 - Dos Bocas HP to Ponce TC (Transmission)	2023 Q2	Transmission	
37	165208	FAASt Transmission Access Roads (GroupedEnvironmental)	TBD	Environment	Inserted Cells
					Inserted Cells