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

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 To Complete Generation Projects SOWs Submittal And Partial Responses To RFI And Request For Extension Of Time To Submit Additional Responses To RFI

MOTION TO COMPLETE GENERATION PROJECTS SOWS SUBMITTAL AND PARTIAL RESPONSES TO RFI AND REQUEST FOR EXTENSION OF TIME TO SUBMIT ADDITIONAL RESPONSES TO RFI

COMES NOW the Authority Puerto Rico Electric Power Authority ("PREPA"), through its counsel of record, and respectfully submits and requests as follows:

I. PROCEDURAL BACKGROUND

On November 15, 2021, PREPA filed a *Motion to Submit Fourth Group of Generation Projects* ("November 15 Motion"). Along with the November 15 Motion, PREPA submitted a comprehensive list of Generation Projects[1] which consist of repair work projects of generation assets and for which PREPA will seek reimbursement under several FEMA programs. November 15 Motion at Attachment A.

On November 22, 2021, the Energy Bureau entered a *Resolution and Order Nunc Pro Tunc*[2] partially addressing the November 15 Motion ("November 22 Order"). Further, the Energy Bureau stated that it would

> promptly issue a resolution evaluating the Proposed Generation Projects. However, as a preliminary matter, the Energy Bureau stated that it considered that most of the Proposed Generation Projects entail capital and/or maintenance-related investments inconsistent with the Approved IRP and Modified Action Plan as well as PREPA's approved budget." *See,* November 22 Order at pp. 1-2, ¶ 3. The Energy Bureau added that it would

[1] Capitalized terms not defined herein shall be considered with the meaning provided to them in the January 13 Motion.
[2] This *Resolution and Order* amended the *Resolution and Order* entered by the Energy Bureau on November 18, 2021.

> evaluate the Generation Projects with the urgency that circumstances require.

Id. at p. 2, ¶ 4.

On November 29, 2021, PREPA filed a *Motion to Clarify and Request for Technical Conference* ("November 29 Motion") to address and explain that the November 15 Motion did not have the intention of changing or amending the Approved IRP and Modified Action Plan, nor to be inconsistent with these plans. Ultimately, the motion intended to provide additional information to aid the Energy Bureau in its evaluation of the Generation Projects previously submitted. In the November 29 Motion, PREPA reiterated its objective to pursue projects that comply and follow both plans and therefore, PREPA requested the Energy Bureau to schedule a technical conference to further discuss the concerns and questions the latter may have relating to those projects.

On January 4, 2022, PREPA was served with a *Resolution and Order* ("January 4 Order") by which the Energy Bureau conditionally approved the projects described in Attachments A to H of the referenced order, pending the submittal by PREPA of the statement of work ("SOW") of each project. The approval included permanent repairs for the San Juan, Aguirre, Aguirre Combined Cycle, Costa Sur, Palo Seco, Cambalache, Mayagüez Hydro-gas power plants and the Hydro-gas turbine peakers. Other works approved are common to all power plants (*i.e.* item no. 96, interior dry cleaning). The Energy Bureau divided the projects in two groups: (i) the works included in Attachments A to H of the January 4 Order which were conditionally approved ("Conditionally Approved Projects") and (ii) projects that the Energy Bureau determined to defer for further evaluation and are listed in Attachment I of the January 4 Order ("Deferred Projects").

The January 4 Order additionally provides that PREPA must submit on January 14, 2022, the SOW for each Conditionally Approved Projects and also for the Deferred Projects for the Energy Bureau's evaluation. January 4 Order, page. 3, Sec. III. Additionally, the Energy Bureau

directed PREPA to answer, on or before January 19, 2022, the following requests for information ("RFI"):

> 1. The current status of each unit listed in the Proposed Generation Projects,
> 2. if and how the expenditure will help bring the unit back to availability for operation,
> 3. when the unit would be available for operation if the expenditure was made,
> 4. the expected duration of availability status of the unit after the expenditure is made, and any other required explanation.
> 5. Provide an updated snapshot of the current status of repairs and expected availability over the next three years for the units located at San Juan, Palo Seco, Costa Sur and Aguirre.
> 6. Provide either the "Draft released to PREPA" of the "10-Year Thermal Generation Retirement, Addition and Conversion Plan" as listed on page 7 of the December 2021 Status Report17 scheduled for finishing by March 2022 or provide a synopsis of PREPA's current understanding of how planned retirements of the fossil fleet are considered when requesting approval for maintenance and capital investment funding through the instant procedure.

Id. at p. 4.

These questions relate to the status, plans and repairs of *all* the units for which PREPA has planned a Proposed Generation Project and comprises the entire generation fleet of PREPA.

On January 13, 2022, PREPA submitted a motion titled *Partial Compliance with the January 4 Order and Request for Extension of Time* ("January 13 Motion") together with a total of 25 Generation Projects SOWs for the review and approval of the Energy Bureau. January 13 Motion at Attach. A. Further, PREPA requested an extension of time until February 14, 2022, to submit the remainder of the SOWs ("Outstanding SOWs") requested by the Energy Bureau.

Thereafter, on January 18, 2022, PREPA filed a *Request for Extension of Time to Submit Responses to RFI Included in the January 4 Order* ("January 18 Motion") asking the Energy Bureau to grant until February 14, 2022, to submit the responses to the RFI.

On January 22, 2022, the Energy Bureau entered an order granting, *inter alia*, the requests for extension made by PREPA in the January 13 and January 18 motions. Therefore, the operative deadline to file the Outstanding SOWs and responses to the RFI is February 14, 2022.

Last week, the Energy Bureau entered a Resolution and Order approving 23 of the 24 Generation Projects SOWs presented with the January 13 Motion. The Energy Bureau did not approve one of the Deferred Projects (SOW 4069) and stated that it will evaluate said project once PREPA provides more specific information regarding the availability of the generation fleet and actual condition or provide a synopsis of PREPA's current understanding of how planned retirements of the fossil fleet are considered when requesting approval for maintenance and capital investment funding through the captioned proceeding. The Energy Bureau further stated that SOW 4069 shall be discuss in the proposed Technical Conference that shall be scheduled once PREPA filed all the Outstanding SOWs and responds to the RFI.

II. GENERATION PROJECTS SOWS

a. Submittal of Outstanding SOWs

To date, PREPA has submitted a total of 79 Generation Projects SOWs to for the evaluation and approval of the Energy Bureau[3] and, as stated above, the Energy Bureau has approved 23.

In compliance with the January 4 and January 18 orders, PREPA completed a total of 23 additional Generation Projects SOWs which are submitted herein for the review and approval of

[3] *See*, January 13 Motion; *Motion to Submit Additional Generation Projects SOWs; Second Motion to Submit Additional Generation Projects SOWS*; and *Third Motion to Submit Additional Generation Projects SOWs; Fourth Motion to Submit Additional Generation Projects SOWs*, presented to the Energy Bureau on January 13, 25 and 28 and February 2 and 8, 2022, respectively.

the Energy Bureau. Attach. A. Out of these Generation Projects SOWs, 22 belong to the Conditionally Approved Projects, while 1 is part of the Deferred Projects.[4]

To facilitate the evaluation of the Generation Projects SOWs submitted, PREPA hereby includes a table that details and breakdowns the SOWs as follows: the SOW number assigned by PREPA (first column), facility (second column), project name (third column) and a summary of the proposed scope of work (fourth column). *See*, Attach. B.

With this submittal, PREPA has tendered with the Energy Bureau a total of 102 Generation Projects SOWs for evaluation and approval,[5] which is the totality of the Generation Projects presented with the November 15 Motion and for which the Energy Bureau ordered PREPA to submit SOWs. Therefore, PREPA has fully complied with the January 14 and 18 order with regards to the Outstanding SOWs.

b. Request for Confidential Designation and Treatment

The Generation Projects SOWs presented herein include global positioning system ("GPS") coordinates of PREPA's power plants, which is critical energy infrastructure information ("CEII") that cannot be disclosed to the public (*i.e.,* Attach. A, SOW 1016, p. 4 at sec. 2.1, respectively). To protect such confidentiality, PREPA has redacted the GPS information from the Generation Projects SOWs herein submitted (Attach. A) and requests the Energy Bureau to determine that the GPS information is CEII and thus, confidential, and to maintain the public files with the redaction already provided.

The following is a detailed list of the information that PREPA asserts is confidential and must be kept under seal:

[4] SOW 1016 marked with asterisks in Exhibit B.
[5] PREPA originally presented 104 Generation Projects to the Energy Bureau. However, two projects were consolidated with other projects. The project no. 30 is now part of SOW 2029 (no. 29) and the project no. 64 is now part of SOW 3065 (no. 65).

SOW NO.	PROJECT NAME	CONFIDENTIAL INFORMATION	LEGAL BASIS
1016	San Juan Power Plant – Unit 10 Rehabilitation	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 10.3	CEII
1017	Steam Rotor Replacement Unit 5 and CT Repairs	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
1018	San Juan Unit 5 LTSA	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 10.3	CEII
1019	San Juan Unit 6 LTSA	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 10.3	CEII
5082	Hydrogas Gas Turbine Peakers – Generator Breakers	GPS Location Page 10-13, Sec. 10.3	CEII
5083	Hydrogas Gas Turbine Peakers – Turbo Compressors	GPS Location Page 9-11, Sec. 10.3	CEII
5084	Hydrogas Gas Turbine Peakers – Speed Reduction Gear	GPS Location Page 9-11, Sec. 10.3	CEII
5085	Hydrogas Gas Turbine Peakers – Exhaust Plenums	GPS Location Page 9-13, Sec. 10.3	CEII
5086	Hydrogas Gas Turbine Peakers – Exhaust Gas Diffusion Ducts	GPS Location Page 9-13, Sec. 10.3	CEII
5087	Hydrogas Gas Turbine Peakers – Major Outage – Turbo Compressor – 15 Units	GPS Location Page 10-15, Sec. 10.3	CEII
3068	Costa Sur – Upgrade to Foxboro Simulation System	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII

SOW NO.	PROJECT NAME	CONFIDENTIAL INFORMATION	LEGAL BASIS
8093	All Power Plants – Stamp R and Mechanical Repair Works for Boilers and Turbo Generators	GPS Location Page 9, 55-57, Sec. 10.3	CEII
8094	All Power Plants – Hydroblasting Service for Condensers	GPS Location Page 9, 86-88, Sec. 10.3	CEII
8095	All Power Plants – Hydroblasting Service for Condensers	GPS Location Page 9, 86-88, Sec. 10.3	CEII
8096	All Power Plants – Interior Dry-Cleaning Service for Boilers	GPS Location Page 11, 24-26, Sec. 10.3	CEII
8097	All Power Plants – Electrical and Instrumentation Works	GPS Location Page 10, 14-16, Sec. 10.3	CEII
8098	All Power Plants – Acid Substances for All Plants	GPS Location Page 9, 36-38, Sec. 10.3	CEII
8099	All Power Plants – Refractory, Insulation, Stack and Painting Application Works	GPS Location Page 10, 23-25, Sec. 10.3	CEII
8100	All Power Plants – Scaffolding Inside and Outside Boilers Works	GPS Location Page 10, 24-26, Sec. 10.3	CEII
8101	All Power Plants – Waste Management Services Contract	GPS Location Page 9, 19-21, Sec. 10.3	CEII
8102	All Power Plants – Non-Destructive Examinations and Inspection Services	GPS Location Page 10, 20-30, Sec. 10.3	CEII
8103	All Power Plants – Cargo Elevators Inspection and Repairs	GPS Location Page 10, 19-21, Sec. 10.3	CEII
8104	All Power Plants – Coating Application for Boiler Structures and Chimneys	GPS Location Page 9, 10-12, Sec. 10.3	CEII

Article 6.15 of the *Puerto Rico Energy Transformation and RELIEF Act*, Act no. 57 of 2014, as amended ("Act 57")[6], provides that "any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Bureau] to treat such information as such[.]" *Id.* at Sec. 6.15. "If the Energy [Bureau], after the appropriate evaluation, believes such information should be protected, it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* at Sec. 6.15(a). If the Energy Bureau determines that the information is confidential, "the information shall be duly safeguarded and delivered exclusively to the personnel of the Energy [Bureau] who needs to know such information under nondisclosure agreements." *Id.* at Sec. 6.15(b). "The Energy [Bureau] shall swiftly act on any privilege and confidentiality claim made by a person subject to its jurisdiction by means of a resolution to such purposes before any allegedly confidential information is disclosed." *Id.* at Sec. 6.15(c).

Pursuant to its vested powers, the Energy Bureau approved the *Regulation on Adjudicative, Notices of Compliance, Rate Review, and Investigations Proceedings* ("Regulation 8543").[7] Regarding the safeguards that the Energy Bureau gives to confidential information, Regulation 8543 provides that:

> [i]f in compliance with the provisions of [Regulation 8543] or any of the Energy Bureau's orders, a person has the duty to disclose to the Energy Bureau information considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the Energy Bureau the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The Energy Bureau shall evaluate the petition and, if it understands

[6] *Puerto Rico Energy Transformation and RELIEF Act*, Act no. 57 of May 27, 2014, 22 L.P.R.A. §§ 1051-1056.

[7] Energy Bureau, *Regulation on Adjudicative, Notices of Compliance, Rate Review and Investigations Proceedings*, No. 8543 (December 16, 2015).

> the material merits protection, proceed according to what is set forth in Article 6.15 of Act No. 57-2014, as amended.

Regulation 8543 at Sec. 1.15.

Federal and Puerto Rico law protect the confidentiality of CEII, the public disclosure of which may pose a security threat in that the information could be useful to a person or group in planning an attack on critical infrastructure. *See, e.g.*, 18 C.F.R. § 388.113, as amended by Federal Energy Regulatory Commission ("FERC") Order No. 683, *Critical Energy Infrastructure Information* (issued September 21, 2006); *USA Patriot Act of 2001*, § 1016, creating the *Critical Infrastructures Protection Act of 2001*, including 42 U.S.C. § 5195c(e) (defining Critical Infrastructure). FERC regulations subject such information to limitations on use and disclosure to "ensure that information deemed CEII stays out of the possession of terrorists." 18 C.F.R. § 388.113(d)(4). *Off. of People's Counsel v. Pub. Serv. Comm'n*., 21 A.3d 985, 991, Util. L. Rep. P 27157, 2011 WL 2473405 (D.C. App. 2011).

Under the Critical Infrastructures Protection Act of 2001, the term "critical infrastructure" means "systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters." 42 U.S.C. § 5195c(e). In 2006, FERC Order no. 683 amended the regulations for gaining access to CEII and simplified procedures for obtaining access to CEII without increasing vulnerability of the energy infrastructure and ensuring that access to CEII does not facilitate acts of terrorism.

A utility is not required to obtain FERC or other federal government approval to designate information as CEII. For example, information required by FERC's Annual Transmission Planning and Evaluation Report, Form No. 715 ("FERC No. 715"), is *de facto* considered CEII and is automatically afforded the heightened protections. FERC No. 715 requires that any

transmitting utility that operates integrated (non-radial) transmission facilities at or above 100 kV must annually submit information including but not limited to: Power Flow Base Cases, Transmitting Utility Maps and Diagrams, Transmission Planning Reliability Criteria, Transmission Planning Assessment Practices, and Evaluation of Transmission System Performance. Any utility that submits the required transmission information pursuant to FERC No. 715 does so with the knowledge that, as stated in the Form's Instructions, FERC "considers the information collected by this report to be CEII and will treat it as such." *See also* 18 C.F.R. § 141.300(d) relating to the Form and CEII.

Mainland regulators typically do not require a utility that designates material as CEII to follow any process before the federal government to make or support such a designation, and, further, that the regulator, in its informed discretion, can establish limits on how information that it considers CEII can be accessed.

Furthermore, and regarding the foregoing argument, FERC has ruled on several occasions that GPS coordinates of any project features "qualify as CEII because it provides more than just location." *See e.g.,* Final Rule, Docket Nos. RM02-4-000, PL02-1-000; Order No. 630, Note 31, entered on February 21, 2003 (ruling that FERC considered the global positioning system coordinates of any project features (precise surveyed or GPS coordinates at or above two decimal points of accuracy of equipment and structures) gas information to qualify as CEII because it provides more than just location).[8]

The aforementioned request for relief has been granted in other matters and dockets, and for requests made under the captioned case, in which PREPA has had to produce information that included CEII, more specifically GPS. For example, two weeks ago PREPA submitted January 13

[8] Federal Register: March 3, 2003 (Volume 68, Number 41); Rules and Regulations, pp. 9857-9873.

Motion, which included several statements of works like the Generation Projects SOWs tendered with this motion. The January 13 Motion Generation Projects SOWs included GPS information that PREPA redacted from the public filing and asserted that should remain under seal and declared confidential because, pursuant to federal and local law, it qualified as CEII. After evaluating PREPA's arguments, on January 21, 2022, the Energy Bureau granted confidential designation and treatment to the GPS information that had been redacted from the public versions of the filing. January 21 Order at pp. 3-5, Sec. III.

Is its respectfully submitted that the redacted GPS information qualifies as CEII and thus, should remain redacted. Furthermore, it is asserted that the redactions made are the manner that least affect the public interest, transparency, and the rights of the parties involved in this administrative procedure. *See*, Act 57-2014 at Sec. 6.15(a). Accordingly, and pursuant to the above, it is respectfully requested that the Honorable Energy Bureau find that the information identified by PREPA as CEII is confidential and that the Secretary of the Energy Bureau be directed to keep the confidential CEII under seal.

c. Request for Approval of the Generation Projects SOWs

PREPA respectfully request the Energy Bureau to approve the Generation Projects SOWs as submitted herein and all previous PREPA's motions submitting SOWs for the Energy Bureau's approval. As stated in several submittals, PREPA's goal to move in a direction that leads to lower costs and cleaner energy requires maintaining its system's reliability and stability during such transition. Consequently, the Generation Projects SOWs submitted for the review and approval of the Energy Bureau consist of repair works *necessary* to increase the current dependable available generation and provide the People of Puerto Rico a safe and reliable electrical service –while the integration of reliable new resources is completed– and thus prevent future major outages in

compliance with the SOP and POR reliability criteria. In conclusion, the proposed Generation Projects are *crucial* for PREPA to maintain the reliability of the generation system during the process of integrating new resources. Therefore, PREPA requests the Energy Bureau to approve the Generation Projects SOWs submitted herein and those submitted previously.

III. REQUEST FOR INFORMATION

a. Responses to RFI

PREPA has completed, and hereby submits for the Energy Bureau's evaluation, the responses to RFI nos. 1–5. The responses are included with this submittal as Attachment C. PREPA will provide further explanation of these responses and reports during the technical conference the Energy Bureau will schedule.

b. Request for Extension of Time to Submit Response to RFI no. 6

RFI no. 6 orders PREPA to

> [p]rovide either the "Draft released to PREPA" of the "10-Year Thermal Generation Retirement, Addition and Conversion Plan" as listed on page 7 of the December 2021 Status Report17 scheduled for finishing by March 2022 **or** provide a synopsis of PREPA's current understanding of how planned retirements of the fossil fleet are considered when requesting approval for maintenance and capital investment funding through the instant procedure.

January 4 Order at p. 4, ¶ 6 (emphasis added).

PREPA affirms that it continues to work diligently to complete the answer to the RFI no. 6 but has not been able to complete it in the time allotted by the Energy Bureau, within the February 14 deadline, and therefore, needs an extension of time to comply and present the response thereto. Even though PREPA's officers (specifically the power plant personnel) have been working assiduously to gather the information necessary to answer RFI no. 6, during the past months

PREPA continues to operate the power plants with a minimum amount of personnel, while performing other functions such as identifying and producing the information to submit the Outstanding SOWs and the responses to the RFI. Even though PREPA's officers began working to produce the information requested in the RFI the day the order was entered and is currently working to produce the information with the priority it has, PREPA has been unable to finalize the task at hand.

It is respectfully asserted that PREPA can complete the response to RFI no. 6 next week. Therefore, considering the days needed to finish the compilation of the information, additional time to review and sign-off, PREPA will be prepared to submit the final response to RFI no. 6 in the next seven (7) business days, that is on Wednesday, February 23, 2022.

PREPA can advance to the Energy Bureau that it will provide a summary of how PREPA considered the retirement of the fossil flee when requesting approval for maintenance and capital investment funds instead of the draft plan. The draft plan is still being developed and as reported by PREPA in the Palo Seco docket, it will be submitted in March 2022.[9]

It is respectfully asserted that the foregoing request for extension of time to submit the responses to RFI no. 6 is made in good faith and that it has carefully examined the matter and has concluded that there is a true need for an extension; has not created the need for the extension through any lack of due diligence; and has made a bona fide effort to comply with the January 4 and 18 orders without the requested extension.

IV. CONCLUSION

[9] *Motion to Submit January 2022 Status Report in Compliance with Order*, filed in case no. NEPR-MI-2021-0003, *In Re: Preliminary Studies for New Combined Cycle Power Plant in Palo Seco.*

WHEREFORE, PREPA respectfully requests the Honorable Energy Bureau to approve the 102 Generation Projects SOWs as submitted; to accept the responses to the RFIs as herein submitted; to grant an extension of seven (7) business days, that is until Wednesday, February 23, 2022, to submit a response to RFI no. 6; and to schedule the technical conference to discuss the Deferred SOWs as soon as possible.

RESPECTFULLY SUBMITTED.

In San Juan Puerto Rico, this 14th day of February 2022.

s/ Maralíz Vázquez-Marrero
Maralíz Vázquez-Marrero
mvazquez@diazvaz.law
TSPR No. 16,187

s/ Katiuska Bolaños-Lugo
Katiuska Bolaños-Lugo
kbolanos@diazvaz.law
TSPR No. 18,888

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.
290 Jesús T. Piñero Ave.
Oriental Tower, Suite 803
San Juan, PR 00918
Tel. (787) 395-7133
Fax. (787) 497-9664

CERTIFICATE OF SERVICE

It is hereby certified that I have filed the foregoing with the Clerk of the Energy Bureau using the electronic filing system using https://radicacion.energia.pr.gov/login and also, that I have served a copy on LUMA Energy, LLC and LUMA Energy ServCo, LLC through their counsel of record at laura.rozas@us.dlapiper.com and margarita.mercado@us.dlapiper.com.

In San Juan Puerto Rico, this 14th day of February 2022.

s/ Katiuska Bolaños-Lugo
Katiuska Bolaños-Lugo

Attachment A

[*To be submitted via email for upload*]

Attachment B

SOWS PRESENTED FOR APPROVAL

SOW NO.	FACILITY	PROJECT NAME	PROPOSED SCOPE OF WORK
1016	San Juan Power Plant	Unit 10 Rehabilitation	Provide parts and service for the open-inspection and close of the steam turbine and generator. Also, in shop repairs for the steam turbine and the generator rotor and oil flush of the turbine.
1017	San Juan Power Plant	Steam Rotor Replacement Unit 5 & CT Repairs	Replacement of all the main components of the steam rotor of Unit 5 and perform all the repairs of the combustion turbine, including its auxiliary equipment.
1018	San Juan Power Plant	LTSA SJ5	Major overhaul – turbines and auxiliary components Unit 5
1019	San Juan Power Plant	LTSA SJ6	Major overhaul – turbines and auxiliary components Unit 6
5082	Hydrogas Gas Turbine Peakers	Procurement of Spare Generator Breakers for Frame 5000 Hitachi Gas Turbines	Procurement and delivery of seven (7) 2000amp, 15.0kV rms (operational voltage - 13.18kv) spare main breakers to be used for the Frame 5000 Hitachi Gas Turbines during emergency or maintenance repair works.
5083	Hydrogas Gas Turbine Peakers	Procurement of Turbo-Compressors for Frame 5000 Gas Turbines	Procurement and delivery of two (2) Rating 23250KW, 17 stages, 2 stages, 5100 rpm re-build turbo-compressor for the Frame 5000-N Gas Turbines to be used during emergency or repair works. (Vega Baja and Costa Sur).
5084	Hydrogas Gas Turbine Peakers	Procurement of Spare Speed Reduction Gear for Frame 5000 Gas Turbines	Procurement and delivery of two (2) 5094/3600 RPM, Rating; 28,000KW spare speed reduction gears for Frame 5000 Gas Turbines to be used during emergency of repair works (Jobos).
5085	Hydrogas Gas Turbine Peakers	New Spare Three Exhaust Plenums for Frame 5000 Gas Turbines	Fabrication and Delivery of three (3) 117.5” x 75.26” x 106.5” spare steel exhaust plenums for the Frame 5000

			Gas Turbines to be used during repair works.
5086	Hydrogas Gas Turbine Peakers	Procurement of Three Exhaust Gas Diffusion Ducts for Frame 5000 Gas Turbines	Fabrication and Delivery of three (3) 41" Internal Diameter/ 46” External Diameter spare steel exhaust gas diffusion ducts the Frame 5000 Gas Turbines to be used during repair works.
5087	Hydrogas Gas Turbine Peakers	Major Outage Turbo - compressor (CT) 15 units	Major outage for all Frame 15 units which shall include repairs and overhaul of a defined scope as per-unit needs, to assure availability and reliability at most.
3068	Costa Sur Power Plant	Upgrade to Foxboro Simulation System	Services of software and hardware installation and programming to update the simulation station of the Foxboro control system.
8093	All Power Plants	Stamp R - Mechanical Repair Works for Boilers and Turbo-Generators Contract	All mechanical repairs if required to boilers, turbo generators and auxiliary components.
8094	All Power Plants	Hydro-blasting Service for Condenser	Hydro Blasting pressure washer for condensers.
8095	All Power Plants	Hydro-blasting Service for Boilers	Pressure washing and neutralization service of the internal and external components of the boiler and other areas of the PREPA's power plants.
8096	All Power Plants	Interior Dry-Cleaning Service for Boilers	Interior dry-cleaning service for boilers.
8097	All Power Plants	Electrical and Instrumentation works in power plants	Services of inspection, maintenance and repair of electrical auxiliary components and control systems necessary for the operation of the PREPA's power plants.
8098	All Power Plants	Procurement Acid for all power plants	Procurement and delivered of Acid substance used on the power plant for pH Control during water treatment of process water and demi-water treatment plant maintenance work.

8099	All Power Plants	Refractory, Insulation, Stack and Painting Application Works	Services of removal and replacement of refractory material for boilers and stacks, and the removal and application of painting of stacks.
8100	All Power Plants	Scaffolding Inside and outside Boilers Works	Services of the rental, engineering, and fabrication of scaffolding systems to be used during maintenance and repair works of the PREPA's power plants.
8101	All Power Plants	Waste Management Services Contract for Power Plants	Services of collection and deposit of non-hazardous waste materials and non-organic silt material collected from the sludge pools of the PREPA's power plants.
8102	All Power Plants	Non-Destructive Examinations and Inspection Services	Services of inspection and testing of repair processes such as welding of boiler tubes, construction or repair of water and fuel tanks.
8103	All Power Plants	Inspection and Maintenance Cargo Elevator	Inspection of and maintenance service of the cargo elevators used to transport personnel, materials and equipment necessary for the operation and maintenance of the PREPA's power plants.
8104	All Power Plants	Coating Application Boiler Structures and Chimneys All Power Plants	Supply all materials, equipment and services for the surface preparation and application of paint coating of all structural elements that supports all the power plant's boiler components and also the exhaust stacks.

Attachment C

[*To be submitted via email for upload*]