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**: Partial Compliance with the January 4 Order and Request for Extension of Time

PARTIAL COMPLIANCE WITH THE JANUARY 4 ORDER AND REQUEST FOR EXTENSION OF TIME

COMES NOW the Authority[1], 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* (the "November 15 Motion"). Along with the November 15 Motion, PREPA submitted a comprehensive list of Generation Projects which consist of repair work projects of generation assets and for which PREPA will seek reimbursement under several FEMA programs. *See*, 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 (the "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 considers 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 evaluate

[1] Capitalized terms not defined herein shall be considered with the meaning provided to them in the November 15 Motion, the November 29 Motion and the January 4 Motion.
[2] This *Resolution and Order* amended the *Resolution and Order* entered by the Energy Bureau on November 18, 2021.

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* (the "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 in an effort to aid the Energy Bureau in its evaluation of the Generation Projects submitted. On that note, PREPA's November 29 Motion reiterated its objective to pursue projects that comply and follow both plans. 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.

PREPA did not receive a response to the request for relief made in the November 29 Motion and resorted to file another motion reiterating its request for a prompt decision regarding the Generation Projects included in Attachment A of the November 15 Motion and/or for the scheduling of a technical conference to discuss the projects proposed and answer any concerns or questions the Energy Bureau may have. *See*, *Motion to Reiterate Request for Approval of Generation Projects and/or Technical Conference* filed on January 4, 2022 (the "January 4 Motion").

Later that day, 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 includes permanent repairs for the San Juan, Aguirre, Aguirre Combined Cycle, Costa Sur, Palo Seco, Cambalache, Mayaguez 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) (all the approved works included in Attachments A to H hereinafter referred to as "Conditionally Approved Projects"). Nonetheless, the Energy Bureau determined to defer for further evaluation several of the Generation Projects. The deferred projects are listed in Attachment I of the January 4 Order (the "Deferred Projects").

The January 4 Order additionally provides directives regarding the Conditionally Approved Projects and the Deferred Projects, among which are to:

i. submit on January 14, 2022, the SOW for each Conditionally Approved Projects and also for the Deferred Projects for the Energy Bureau's evaluation;

ii. submit to the Energy Bureau a copy of the approval by COR3 and/or FEMA of the Conditionally Approved Projects, which shall contain the costs obligated for each project, within ten (10) days of receipt of such approval;

iii. provide the Energy Bureau the actual contracted cost to construct the Conditionally Approved Projects, within ten (10) days from the execution of the contract; and

iv. inform the Energy Bureau once the approved projects are complete.

II. PARTIAL COMPLIANCE WITH THE JANUARY 4 ORDER

In compliance with the January 4 Order, PREPA has completed a total of 24 initial SOWs (the "Generation Projects SOWs") which are submitted herein for the review and approval of the Energy Bureau. *See*, Attachment A. Out of these Generation SOWs, twenty-three (23) pertain to the Conditionally Approved Projects, while one (1) pertains to the Deferred Projects.

To facilitate the evaluation of the SOWs presented, PREPA hereby submits a table details and breakdowns: project number assigned by the Energy Bureau to each Generation Project SOW

(first column), the SOW number assigned by PREPA (second column), project name (third column) and a summary of the proposed scope of work (fourth column). *See*, Attachment B.

III. REQUEST FOR EXTENSION OF TIME TO SUBMITT ADDITIONAL SOWS FOR THE CONDITIONALLY APPROVED AND THE DEFERRED PROJECTS

All the power plants' personnel have been diligently working to compile all the information that is necessary to complete the SOWs for all the Generation Projects. However, as stated by PREPA in prior motions filed under this and other dockets, the continuous operation of the generation fleet is PREPA's top priority. Hence, gathering and organizing the information needed for the SOWs has been done while the power plants' personnel has been executing their regular operational functions. In fact, compiling this information has been a challenge considering the regular breakages suffered by the generating units during the past months and that the power plants do not have the minimum personnel for running the operations. For example, it is normal that the operations works during a regular day in any of PREPA's power plants are conducted by shifts of sixteen or even more hours each, as there are not enough employees for completing three 8-hour shifts per day. Consequently, compiling all the information necessary to complete the SOWs has taken more time than originally envisioned.

Therefore, by the date of this motion PREPA has only been able to complete 25 Generation Projects SOWs of the 104 work descriptions submitted in the November 15 Motion. Nevertheless, the work to complete the SOWs has not stopped and its currently ongoing with the priority that it has. PREPA understands that it can complete the remaining SOWs during the next month and it is coordinating to submit the outstanding Generation Projects SOWs on a "rolling basis". Taking into consideration the above-stated, the time needed to finish the compilation of the information, and additional time to review and sign-off, PREPA will complete the submission of the outstanding

Generation Projects SOWs on or before February 14, 2022. Wherefore, PREPA respectfully requests the Energy Bureau to grant until February 14, 2022, to submit the outstanding Generation Projects SOWs in compliance with the January 4 Order.

PREPA respectfully asserts that the foregoing request for an extension 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 resolve the matter without the requested extension.

IV. REQUEST FOR APPROVAL OF THE GENERATION PROJECTS

PREPA respectfully requests the Energy Bureau to approve the Generation Projects SOWs as submitted herein. As stated in the November 15, November 29 and January 4 motions, 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 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 and therefore, PREPA requests the Energy Bureau to approve the Generation Projects SOWs submitted herein.

Should the Energy Bureau have any concerns or questions regarding the Generation Projects SOWs herein submitted, PREPA respectfully request that a technical conference through which PREPA representatives can discuss the Generation Projects SOWs be scheduled. During

the proposed conference, PREPA's personnel shall address any concerns or questions the Energy Bureau may have, so these projects are approved and PREPA can move forward and make the relevant funding requests to COR3 and FEMA.

V. REQUEST FOR CONFIDENTIAL TREATMENT

The Generation Projects SOWs presented herein contain global positioning system ("GPS") coordinates of the power plants, which is critical energy infrastructure information ("CEII") that cannot be disclosed to the public. To protect such confidentiality, PREPA has redacted the GPS information from the Generation Projects SOWs herein submitted 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:

SOW NO.	DESCRIPTION	CONFIDENTIAL INFORMATION	REQUEST FOR CONFIDENTIALITY BASIS
1001	Units 5 Cooling Tower Replacement	GPS Location Page 4, Sec. 2.1	CEII
1003	Units 5 Condenser Repair and Coating Application	GPS Location Page 4, Sec. 2.1 Pag. 9, Sec. 10.3	CEII
1004	Units 5 High Pressure Bleed Valve, Low Pressure Bleed Valve and Heat Injection Steam Valve	GPS Location Page 4, Sec. 2.1 Pag. 10, Sec. 10.3	CEII

SOW NO.	DESCRIPTION	CONFIDENTIAL INFORMATION	REQUEST FOR CONFIDENTIALITY BASIS
1005	Units 5 and 6 Black Start Emergency Generator Upgrade	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 10.3	CEII
1006	Units 5 Replacement of Outlet Valves and Elbow Condenser	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
1020	Control System Upgrade units 5 & 6	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 10.3	CEII
1024	Installation of Modules D&E HRSG Unit 5	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
1025	Replacement of the Online Condenser Cleaner Unit 5	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
2031	Replacement of Load Center 1-4 Condenser Circulating Water Pump	GPS Location Page 4, Sec. 2.1 Page 8, Sec. 10.3	CEII
2032	Sea Water Intake Structural Repairs Work	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 1.03	CEII
2033	Rehabilitation Fuel Tank Farm Liners	GPS Location Page 4, Sec. 2.1 Page 8, Sec. 10.3	CEII

SOW NO.	DESCRIPTION	CONFIDENTIAL INFORMATION	REQUEST FOR CONFIDENTIALITY BASIS
2034	Two New Condenser Discharge Water Pumps Motors	GPS Location Page 4, Sec. 2.1 Page 8, Sec. 10.3	CEII
2035	Two New BCWP Motors	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
2039	Aguirre Combined Cycle Plant Permanent Repairs	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
2040	Hot Gas Path Inspection Work Units 1-1 and 1-2	GPS Location Page 4, Sec. 2.1 Page 13, Sec. 10.3	CEII
2042	Unit 1 - Major Inspection (Replacement Turbo-Generator)	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
2043	Unit 2 Excitation System	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
2045	Design Fire Pump for Aguirre Power Complex	GPS Location Page 4, Sec. 2.1	CEII
3050	Procurement of Air-Preheaters Baskets, Unit 5	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
3052	Procurement of Condenser Circulating Water Pump (CCWP) and Boiler Circulating Water Pump (BCWP) Spare Motors for Units 5 and 6	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII

SOW NO.	DESCRIPTION	CONFIDENTIAL INFORMATION	REQUEST FOR CONFIDENTIALITY BASIS
3055	Replacement of Unit 5 Electric Load Center	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
3063	BFWP Inner Barrel Bundle	GPS Location Page 4, Sec. 2.1 Page 9. Sec. 10.3	CEII
4069	PS 3 Procurement and Delivery of Water Wall Boiler Tubes and Economizer Unit PS3	GPS Location Page 4, Sec. 2.1 Page 9, Sec. 10.3	CEII
4077	Mega-Gens Environmental Commissioning	GPS Location Page 4, Sec. 2.1 Page 10, Sec. 9.3	CEII
7092	Unit 1A, 1B and 4A Rehabilitation	GPS Location Page 4, Sec. 2.1 Page 10, 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")[3], 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

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

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").[4] 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 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. §

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

388.113(d)(4). *Off. of People's Counsel v. Pub. Serv. Commn.*, 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 in order 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 in order 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 argument made by PREPA, FERC has ruled on several occasions that global positioning system (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).[5]

The request made herein by PREPA has been granted in other matters and dockets, and also for requests made under the captioned case, in which PREPA has had to produce information that included CEII. For example, on December 1, 2021, PREPA submitted a *Motion to Submit Fifth Group of Generation Projects Scope of Work* (the "December 1 Motion"), which included several statements of works similar to the Generation Projects SOWs tendered with this motion. The December 1 Motion 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 December 20, 2021, the Energy Bureau granted confidential designation and treatment to the GPS information that had been redacted from the public versions of the filing.

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.

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

VI. CONCLUSION

WHEREFORE, PREPA respectfully requests the Honorable Energy Bureau to determine that PREPA has partially complied with the January 4 Order; to grant an extension of time until February 14, 2022; to complete the submittal of the Generation Projects SOWs; to schedule a technical conference to discuss the submitted Generation Projects SOWs, if the Energy Bureau deems it necessary; to determine that the GPS information redacted from the public filing is CEII and thus, confidential information; and to order enter an order directing the Secretary of the Energy Bureau to keep the confidential CEII under seal.

RESPECTFULLY SUBMITTED.

In San Juan Puerto Rico, this 13th day of January 2022.

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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 13th day of January 2022.

s/ Katiuska Bolaños-Lugo
Katiuska Bolaños-Lugo

Attachment A

[*Submitted via email for upload*]

Attachment B

SOW	FACILITY NAME	PROJECT NAME	PROPOSED SCOPE OF WORK
1001	San Juan Power Plant	Units 5 Cooling Tower Replacement	Removal of existing cooling towers; design, build, installation, start up and commissioning of two new three cells cooling towers, model S3E-1222-07Q-3/SY, manufactured by Baltimore Aircoil Company (BAC), with its Lakos Tower Clean Filtration System.
1003	San Juan Power Plant	Units 5 Condenser Repair and Coating Application	Rehabilitation and application of anti-corrosive coating for the water boxes and intake piping of the east side of the Unit condenser.
1004	San Juan Power Plant	Units 5 High Pressure Bleed Valve, Low Pressure Bleed Valve and Heat Injection Steam Valve	Purchase of equipment and parts for the replacement and installation of Vanessa 30,000 Triple Offset Automated Valves - Steam Injection Block Valves & Bleed Valves.
1005	San Juan Power Plant	Units 5 and 6 Black Start Emergency Generator Upgrade	Upgrade the controls system for the black start diesel generator system San Juan CTG 5 &6. - Initial verification and assessment of current system configuration and setup versus electrical drawings and original designed configuration - Engineered / retrofitted control system integration and installation (plc and hmi) - Assure communication between plc and ovation distributed control system at operator control room for remote and fully automated operation - Commissioning and startup support - Control system drawings and manuals - Final Testing and inspection

SOW	FACILITY NAME	PROJECT NAME	PROPOSED SCOPE OF WORK
1006	San Juan Power Plant	Units 5 Replacement of Outlet Valves and Elbow Condenser	Remove and replacement of the existing outlet valve and 42-inch diameter steel elbows, which are part of the outfall of the seawater use to cooldown the condensers of both Units 5 and 6.
1020	San Juan Power Plant	Control System Upgrade units 5 & 6	Perform and upgrade to the Units 5 & 6 Control System, including all the necessary cyber security programming.
1024	San Juan Power Plant	Installation of Modules D&E HRSG Unit 5	Replace critical pressure parts components of San Juan Generation Complex Unit 5 Heat Recovery Steam Generator (HRSG), specifically: Module D High Pressure Economizer 3 Tubes Bundles, Module D Intermediate Pressure Evaporators Tubes Bundles, Module E Intermediate Pressure Economizer Tubes Bundles, Module E High Pressure Economizer 1 Tubes Bundles, Module E High Pressure Economizer 2 Tubes Bundles.
1025	San Juan Power Plant	Replacement of the Online Condenser Cleaner Unit 5	Supply, installation and commissioning of an online condenser cleaner system for Unit 5.
2031	Aguirre Power Plant	Replacement of Load Center 1-4 Condenser Circulating Water Pump	Removal and removal of existing breakers for the Load Center 1-4 of the Condenser Circulating Water Pumps for the cooling system of the condensers of Units 1 and 2.
2032	Aguirre Power Plant	Sea Water Intake Structural Repairs Work	Structural repairs of concrete beams, slabs and walls components of the sea water intake of the of the Aguirre Power Complex.

SOW	FACILITY NAME	PROJECT NAME	PROPOSED SCOPE OF WORK
2033	Aguirre Power Plant	Rehabilitation Fuel Tank Farm Liners	Rehabilitation, repair and installation a of approximately 46,000 square feet of Flexible Membrane Liner System of the Aguirre Fuel Farm area.
2034	Aguirre Power Plant	Two New Condenser Discharge Water Pumps Motors	Procurement and delivery of two 400 Hp-395 RPM, 4,000 Volts-3 Phase, 60 Cycle Re-build Motors for the water discharge condenser pumps for the sea water canal discharge system.
2035	Aguirre Power Plant	Two New BCWP Motors	Procurement and delivery of two New Motors for the water discharge condenser pumps for the sea water canal discharge system.
2039	Aguirre Combined Cycle	Hot Gas Path Inspection and repairs Work Units 2-4 and stand by transformer	Inspect turbine section major components (rotor, buckets, nozzles & shrouds). Replace Stage 1 Buckets (if necessary), Stage 1 Nozzle, transition Pieces and combustion liners with refurbished components. Repair all removed components for futures HGPI. Buy new MCC Transformer 4.16kV / 480V.
2040	Aguirre Combined Cycle	Hot Gas Path Inspection Work Units 1-1 and 1-2	Inspect turbine section major components (rotor, buckets, nozzles & shrouds). Replace Stage 1 Buckets (if necessary), Stage 1 Nozzle, transition Pieces and combustion liners with refurbished components. Repair all removed components for futures HGPI.
2042	Aguirre Power Plant	Unit 1 - Major Inspection (Replacement Turbo-Generator)	Major Overhaul to Gas Turbine Num. 1 including the replacement of all the hot gas path components and the turbo-compressor blades. Also, repair the exhaust gas housing and perform the inspection of the

SOW	FACILITY NAME	PROJECT NAME	PROPOSED SCOPE OF WORK
			turbo-rotor, the generator and repair the Gas Turbine enclosure and filter house.
2043	Aguirre Power Plant	Unit 2 Excitation System Replacement	Replacement of an obsolete Excitation System that has no replacement parts. The new system must increase the reliability and extend service life with replacement parts and service availability.
2045	Aguirre Power Plant	Design Fire Pump for Aguirre Power Complex	Design for an above ground piping lines to replace the obsolete underground piping system. The existing system has undetectable leakages.
3050	Costa Sur Power Plant	Procurement of Air-Preheaters Baskets, Unit 5	Procurement and delivery of hot and cold sections baskets and other components of the pre-heaters of Unit 5.
3052	Costa Sur Power Plant	Procurement of Condenser Circulating Water Pump (CCWP) and Boiler Circulating Water Pump (BCWP) Spare Motors for Units 5 and 6	Procurement and delivery of motors to be storage as spare parts to avoid units forced outages and/or load limitations.
3055	Costa Sur Power Plant	Replacement of Unit 5 Electric Load Center	Replacement of Auxiliary equipment load centers and breakers for turbines 5 and 6 due to obsolescence.
3063	Costa Sur Power Plant	BFWP Inner Barrel Bundle	Engineering and manufacture of an inner barrel bundle of the boiler feed water pump to be used in Unit 5 or 6.

SOW	FACILITY NAME	PROJECT NAME	PROPOSED SCOPE OF WORK
4069	Palo Seco Steam Plant	PS 3 Procurement and Delivery of Water Wall Boiler Tubes and Economizer Unit PS3	Manufacture, testing and delivery of the following components of the Unit 3 boiler; the economizer and water wall boiler tubes.
4077	Palo Seco Steam Plant	Mega-Gens Environmental Commissioning	Perform all environmental and performance tests on three 27 Megawatts Combustion Units to comply with EPA's Air Standards.
7092	Mayaguez	Unit 1A, 1B and 4A Rehabilitation	Repairs of Gas Generator Components of Units 1A and 1B and Repairs of PT (Upgrade 2+) on Power Turbine on Unit 4A.