

**GOBIERNO DE PUERTO RICO**  
**JUNTA REGLAMENTADORA DEL SERVICIO PÚBLICO**  
**NEGOCIADO DE ENERGÍA DE PUERTO RICO**

NEPR

Received:

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**IN RE: TARIFA PERMANENTE DE LA  
AUTORIDAD DE ENERGÍA ELÉCTRICA  
DE PUERTO RICO**

**CASO NÚM.: NEPR-MI-2020-0001**

**ASUNTO:** Moción Para Presentar Informe de Reclamaciones Correspondiente al Periodo del 6 de Octubre al 9 de Noviembre de 2022

**MOCIÓN PARA PRESENTAR INFORME DE RECLAMACIONES  
CORRESPONDIENTE AL PERÍODO DEL 6 DE OCTUBRE  
AL 9 DE NOVIEMBRE DE 2022**

AL HONORABLE NEGOCIADO DE ENERGÍA:

COMPARECE la Autoridad de Energía Eléctrica de Puerto Rico (la “Autoridad”), a través de su representación legal, y muy respetuosamente expone, alega y solicita:

1. El 24 de septiembre de 2020, el Negociado de Energía de la Junta Reglamentadora de Servicio Público (“Negociado de Energía”) notificó una *Resolución y Orden* (“Orden del 24 de septiembre”) que, en la parte aquí relevante, establece:

1. Presentar ante el Negociado de Energía un Informe semanal de Reclamaciones (“Informe de Reclamaciones”), en o antes de las 5:00 pm, de cada viernes. La Autoridad debe presentar el primer informe el 25 de septiembre de 2020. Dicho informe debe incluir las gestiones realizadas con relación a las reclamaciones presentadas por la Autoridad ante FEMA y la(s) compañía(s) de seguro(s). Dicho informe deberá estar acompañado de cualquier documento relacionado (*e.g.*, cartas, solicitudes, correos electrónicos). Este requisito permanecerá en vigor hasta tanto el Negociado de Energía determine lo contrario y es independiente y separado de cualquier solicitud de información establecida por el Negociado de Energía en algún otro proceso.

...

Adicional a la orden anterior, el Negociado de Energía añade los siguientes requerimientos:

1. La Autoridad debe incluir, en el primer Informe de Reclamaciones, un recuento de todas las reclamaciones hechas a la(s) compañía(s) de seguro privadas por concepto de "Extra Expense" a causa de los eventos sísmicos

del pasado mes de enero [de 2020]. Incluyendo, pero sin limitarse a, el análisis utilizado para calcular los costos incrementales reclamados.

2. Asegurarse que las mociones utilizadas en futuras radicaciones incluyan una clara explicación de lo solicitado y la documentación de apoyo pertinente, de manera que los consumidores reciban información de una forma efectiva sobre los procedimientos de la Autoridad ante el Negociado de Energía y se minimice la necesidad de solicitar información adicional.

3. Cualquier desviación de las proyecciones sometidas en un periodo anterior debe ser claramente explicada en las mociones futuras de la Autoridad y representada de forma comparativa (proyección/estimado anterior vs. dato/evento real) mediante la utilización de gráficas. Además, los documentos presentados en formato Excel también deberán ser presentados en formato PDF. La versión en formato PDF debe tener un tamaño de hoja que los datos sean legibles y utilizar márgenes predefinidos que minimicen el número de hojas del documento. Todo ello para facilitar la revisión de la información para los consumidores.

Orden del 24 de septiembre en pp. 3-4.

2. El 31 de julio de 2022, el Negociado notificó una *Resolución y Orden* (“Orden del 31 de julio”) relacionada al Informe de Reclamaciones en la cual ordena a la Autoridad, entre otras cosas,

a:

incluir en los informes semanales información detallada debidamente actualizada de los esfuerzos realizados a tales efectos e incluir en dichos informes copia de cualquier documento, comunicación o trámite (*i.e.*, por la vía digital o impresa) entre la Autoridad y las agencias concernidas, incluyendo los trámites realizados ante la EPA con relación a los mega-generadores.

Orden del 31 de julio en p. 15.

3. El 14 de octubre de 2022, el Negociado notificó una *Resolución y Orden* (“Orden del 14 de octubre”) mediante la cual el Negociado añadió que la Autoridad debe anexar a los próximos Informes de Reclamaciones las comunicaciones relevantes sobre las gestiones realizadas en torno

a su reclamación a las aseguradoras y a FEMA, así como todo documento adicional relacionado, a tenor con la Resolución de 24 de septiembre. Además, el Negociado determinó que

la Autoridad debe proveer mayores detalles en torno a las gestiones realizadas con FEMA y sus aseguradoras. Ante ello, el Negociado de Energía ORDENA a la Autoridad que someta sus Informes de Reclamaciones mensuales de conformidad con lo ordenado en la Resolución de 24 de septiembre y que, además de una compilación de las gestiones realizadas y detalles de sus estrategias en preparación y defensa de la reclamación a las aseguradoras, incluya un resumen detallado de las gestiones más importantes realizadas ante sus aseguradoras y FEMA durante el correspondiente mes, así como el propósito de cada una de dichas gestiones.

Orden del 14 de octubre en p. 6.

4. Con relación a la cadencia de presentación del Informe de Reclamaciones, el Negociado resolvió enmendar la misma y ordenó a que el informe se presente mensualmente durante los primeros diez (10) días de cada mes. *Id.*

5. En cumplimiento con las órdenes citadas arriba, la Autoridad presenta el Informe de Reclamaciones correspondiente al periodo del 29 de septiembre al 5 de octubre de 2022. Anejo A.<sup>1</sup>

POR TODO LO CUAL, se solicita respetuosamente al Negociado de Energía que tome conocimiento de lo aquí informado y determine que la Autoridad ha cumplido con las órdenes de 24 de septiembre de 2020 y 31 de julio y 14 de octubre de 2022.

#### **RESPETUOSAMENTE SOMETIDO.**

En San Juan, Puerto Rico a 10 de noviembre 2022.

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<sup>1</sup> Varios documentos que se adjuntan se han presentado de manera confidencial. En cumplimiento con los procesos para reclamar confidencialidad establecidos bajo el caso CEPR-MI-2016-0009, *In Re: Política Sobre Manejo de Información Confidencial en los Procedimientos ante la Comisión*, la Autoridad presentará un memorando argumentando las bases de derecho que sustentan la petición de determinación de confidencialidad dentro de los próximos diez (10) días.

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## CERTIFICADO DE NOTIFICACIÓN

Certifico que este escrito ha sido presentado a la Secretaria del Negociado de Energía a través del sistema electrónico de radicación <https://radicacion.energia.pr.gov/> y, además, copia del mismo ha sido notificado a la Oficina de Protección al Consumidor por conducto de la Lic. Hannia Rivera a [hrivera@oipc.pr.gov](mailto:hrivera@oipc.pr.gov) y a LUMA Energy ServCo, LLC y LUMA Energy, LLC por conducto de la Lic. Margarita Mercado a [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com).

En San Juan, Puerto Rico, hoy 10 de noviembre de 2022.

*f/ Katiuska Bolaños Lugo*

Katiuska Bolaños Lugo

**Anejo A**



GOBIERNO DE PUERTO RICO  
AUTORIDAD DE ENERGÍA ELÉCTRICA

**Annex A-I**

[Submitted under seal]





# GOBIERNO DE PUERTO RICO

## AUTORIDAD DE ENERGÍA ELÉCTRICA

## II. RECLAMACIÓN A FEMA

### A. Estatus de la reclamación:

La Autoridad, como sub-recipiente, ha continuado los esfuerzos y los trabajos en conjunto con la Agencia Federal para el Manejo de Emergencias (FEMA, por sus siglas en inglés) y la Oficina Central de Recuperación, Reconstrucción y Resiliencia (COR3) para así continuar la reclamación y la aprobación de los daños causados.

A la fecha de este informe, la reclamación incluye un total de gastos de operación, mantenimiento y de combustible incurridos de aproximadamente \$515,911,965, de los cuales se ha reclamado al seguro de la Autoridad la cantidad de \$130,681,001, reduciendo la cantidad del proyecto reclamado a FEMA a \$385,230,964. La aportación federal de 90% de esta reclamación asciende a \$346,707,868 por todos los gastos.

Del total a reclamarse a FEMA se han obligado \$375,140,912 con una aportación federal de 90% que asciende a \$337,626,821. Dicha obligación deja pendiente un balance \$10,090,052 que se encuentra en proceso de apelación. La misma proviene de la determinación de FEMA sobre el resultado de un análisis de razonabilidad de costo.

Concepto de Costos	Total	Cantidad		Cantidad bajo Apelación
	Reclamación	Aprobada		
Combustible:	\$ 375,006,183	\$ 368,606,766	\$ 6,399,418	
O & M:	140,905,782	137,215,148	3,690,634	
<b>Total</b>	<b>\$ 515,911,965</b>	<b>\$ 505,821,913</b>	<b>\$ 10,090,052</b>	
Seguro <sup>C</sup>	\$ 130,681,001	\$ 130,681,001	\$ -	
Porción a Reembolso Federal	385,230,964	375,140,912	10,090,052	
<b>Pareo Federal (90%)<sup>A</sup></b>	<b>\$ 346,707,868</b>	<b>\$ 337,626,821</b>	<b>\$ 9,081,047</b>	

<sup>A</sup> De conformidad con la enmienda al acuerdo entre la Agencia Federal para el Manejo de Emergencias y la Oficina Central de Recuperación, Reconstrucción y Resiliencia el pasado 11 de marzo de 2022 para las subvenciones bajo FEMA-4473-DR.

<sup>B</sup> El gasto total de combustible en el periodo de la reclamación.

<sup>C</sup> Las cantidades de seguro están sujetas a cambios. Una vez se culmine con la reclamación de seguro las cantidades a FEMA se ajustaran para reflejar el cambio en los proyectos.



Del total de gastos asociados a combustible, \$375,006,183, sujetos en esta reclamación, se estima que serán reembolsados por las aseguradoras y FEMA un total de \$350,573,665. Por

concepto de seguro la Autoridad espera recibir un total de \$130,681,001 y por FEMA la cuantía de \$219,892,664.09 luego de la reducción por pareo local.

*Reducción por concepto de Seguro por combustible:*

	SEGURO	FEMA	TOTAL
Combustible:	130,681,001.00	244,325,182.32 D \$	375,006,183.32
O & M:	-	140,905,782.07 \$	140,905,782.07
<b>Total</b>	<b>130,681,001.00</b>	<b>385,230,964.39</b> \$	<b>515,911,965.39</b>

*Reducción por Pareo Local*

	100%	90%	TOTAL
Total de Combustible a recibirse:	130,681,001.00	219,892,664.09	\$ <b>350,573,665.09</b>
		D x 90% = E	

A la fecha de este informe la Autoridad ha recibido el total obligado por combustible por \$214,133,188.24. El mismo se basa en la cantidad aprobada de \$368,606,766 menos la aportación de seguro de \$130,681,001 y la reducción de pareo local de 10% que aumenta a \$23,792,576.47.

	TOTAL	Recibido	Pendiente
Combustible Rembolsable por FEMA	219,892,664.09	214,133,188.24	5,759,475.85

Del total a recibirse quedarían pendientes \$5,759,475.85 sujetos al balance pendiente bajo apelación.

## B. EVENTOS Y GESTIONES REALIZADAS EN OCTUBRE 2022

### **Obligación de Fondos:**

En sus gestiones de obligar los fondos para poder continuar con la solicitud de reembolso, la AEE realiza llamadas semanales con FEMA para evaluar el estado de la formulación y proveer cualquier asistencia técnica necesaria.

El 4 de octubre de 2022, en una de las llamadas recurrentes FEMA solicito información, a petición de la oficina de asunto legislativos en Washington, cesantía del esfuerzo por parte de la AEE para requisar el alquiler de generación temporera a inicios del 2020. La AEE procedió a proveer la documenta vía email, ver anexo.

El 14 de octubre de 2022 FEMA culmino la evaluación y obligación de la versión 2 aumentando el balance obligado por \$51,999,184.17 para un monto total de \$337,626,821.01. Se incluye reporte del sistema de FEMA como anexo.



Durante el mes de octubre 2022 no se generaron comunicaciones oficiales escritas por parte de la AEE, COR3 o FEMA.

### **Reembolso de Fondos:**

El 5 de agosto de 2022, previo a la obligación de fondos y con la intención de acelerar el desembolso entrante, la AEE sometió a COR3 la documentación requerida para obtener el reembolso relacionado a la obligación pendiente.

En sus gestiones de acelerar y cumplir con el recibo de los mismos, la AEE mantiene reuniones semanales con COR3 para discutir cualquier duda, pregunta o requerimiento de información adicional.

El 18 de octubre de 2022, la AEE recibió de parte de COR3 una solicitud de información adicional solicitando narrativas y documentos de apoyo sobre el inventario de combustible. Dicha solicitud se contestó el mismo día aclarando los procesos, incluyendo las narrativas e indicando que los documentos solicitados ya estaban incluidos previamente en la petición de reembolso.

El 27 de octubre de 2022 la AEE recibió el total solicitado por \$51,999,184. Se aneja las cartas de pago y notificaciones relacionadas.

### **Apelación**

El 16 de septiembre de 2022 la Autoridad radico ante COR3 la apelación sobre la determinación de FEMA para continuar su reclamación por la totalidad de los fondos incurridos.

Dicha apelación se encuentra en la posesión de COR3 pendiente de su evaluación y trámite con FEMA.

La AEE en su gestión de asegurar el cumplimiento y ejecución mantiene comunicaciones telefónicas con los representantes del grupo legal de COR3. El 27 de octubre de 2022, mediante llamada telefónica la AEE fue notificada que COR3 continua con la evaluación y que esperar radicar la misma antes de la fecha límite pautada el 15 de noviembre de 2022.

### **C. Reembolsos contra cantidades diferidas**

Como expuesto anteriormente, la AEE queda pendiente de recibir un total de \$5,759,475.85 sujeto a la apelación que está en progreso.

Aunque la Autoridad tiene derecho y se encuentra apelando dicha determinación, la misma no goza de finalidad y certeza. Por lo tanto, se realizó el siguiente análisis para determinar el impacto en los reembolsos de combustibles contra las cantidades diferidas al consumidor.



**Porción de Combustible sobre Proyecto de FEMA:**

	Total FEMA	Ajuste DM	Pendiente Aprobación
Total de Combustible a recibirse	244,325,182 63%	(6,399,418)	237,925,765 <b>G</b>
Porción de O&M	140,905,782 37%	(3,690,634)	137,215,148
<b>Total</b>	<b>385,230,964 F</b>	<b>(10,090,052)</b>	<b>375,140,912</b>

	G x 90%		
	100%	90%	TOTAL
Combustible a recibirse luego de DM:	130,681,001	214,133,188	344,814,189 <b>H</b>

*Resolución y Orden emitida por el NEPR - 31 de marzo de 2021**Resolución y Orden emitida por el NEPR - 31 de julio de 2022*

Total Diferido
Nuevo total de Combustible

316,548,997

34,024,668

350,573,665

344,814,189 **H**5,759,476 **Exceso diferido**

Como previamente expuesto, el costo de combustible a ser reclamado por FEMA totaliza \$244,325,182, representando un 63% del total de \$385,230,964.

Por tanto, se le confiere la misma proporción a la determinación de \$10,090,052 reduciendo la porción de combustible por \$6,399,418 resultando en un total de \$237,925,765. Luego de la reducción de aportación local (10%) se estima que la porción de combustible a recibirse por FEMA (\$214,133,188) y las aseguradoras (\$130,681,001) seria \$344,814,189.

Por tanto, considerando los balances diferidos al 31 de marzo de 2021 por \$316,548,997 e incluyendo la nueva determinación efectuada el 31 de julio de 2022 por \$34,024,668, el total diferido aumenta a \$350,573,665. **De la Autoridad no ser exitosa en la apelación sobre la determinación realizada por FEMA que reduce la reclamación por \$10,090,052, el balance diferido en exceso se estima totalizaría en \$5,759,476.**

Es importante recalcar que la porción de combustible mantiene conceptos de reducción de seguro que hoy día se estiman en \$130,681,001. De dicha reclamación materializarse por parte de las aseguradoras la porción atribuida a combustible se reduciría por la misma cuantía dejando un total de costos estimados menor al reportado. Por tanto, la porción recibida y a recibirse de los reembolsos de la agencia federal se podrán certificar cuando la Autoridad finalice su reclamación al seguro. Las cantidades reclamadas al seguro y FEMA son estimadas, las cuales se revisan y validan continuamente durante la evaluación de las reclamaciones que realizan estas entidades. Se reitera el que los diferidos de los cargos de la compra de combustible facturado a los consumidores debe realizarse cuando la Autoridad ha recibido el reembolso o cuando hay certeza de que se recibirá el mismo.



# Department of Homeland Security

## Federal Emergency Management Agency

### General Info

<b>Project #</b>	137955 PW # 7	<b>Project Type</b>	Standard
<b>Project Category</b>	B - Emergency Protective Measures	<b>Applicant</b>	PR Electric Power Authority (000-UA2QU-00)
<b>Project Title</b>	Earthquake Peaking Units	<b>Event</b>	4473DR-PR (4473DR)
<b>Project Size</b>	Large	<b>Declaration Date</b>	1/16/2020
<b>Activity Completion Date</b>	1/16/2021	<b>Incident Start Date</b>	12/28/2019
<b>Process Step</b>	Obigated	<b>Incident End Date</b>	7/3/2020

### Damage Description and Dimensions

**The Disaster # 4473DR, which occurred between 12/28/2019 and 07/03/2020, caused:**

#### **Damage # 380820; Emergency Protective Measures (Peaking Units)**

On January 6, 2020, a magnitude 5.8 earthquake struck the southwest region of Puerto Rico causing considerable damage to homes and other private and public structures as well as a partial electric power blackout leaving over 327,000 citizens without power. On January 7, 2020, a magnitude 6.4 earthquake, Puerto Rico's most destructive quake in a century, caused major damage to private and public structures and infrastructure, including structural and mechanical damage to Puerto Rico Electric Power Authorities (PREPA) Costa Sur power plant. Costa Sur, an 820 MW power plant provides over 26% of the electric power on the island. The island suffered a complete electric power blackout as a result of the earthquake and the Costa Sur power plant failure. On January 11, 2020, a magnitude 5.9 aftershock once again rattled Puerto Rico's southwestern coast exacerbating previous damages to the plant.

As a result, PREPA was forced to use the peaking generators to provide power to critical facilities and functions, including hospitals, police departments, fire departments, emergency centers, water facilities, vulnerable populations and the like to safeguard life and safety and to prevent further property damage. This resulted in these units no longer being used for their intended purpose as peaking units, where they would supplement the power provided by the base units, but instead they have been run much more constantly to provide base power for critical facilities and functions and as an emergency protective measure to restore power. The incident period still open.

During the incident period of 12/28/2019 through 7/3/2020, Puerto Rico M6.5 Earthquake created an immediate threat to the health and safety of the general public requiring emergency response and protective measures.

- Provided Electric Power for Power System of Puerto Rico at Aguirre Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Cambache Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Mayaguez Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Dagupao Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Vega Baja Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Yabucoa Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Pao Seco Power Plant from 1/6/2020 to 8/1/2020.
- Provided Electric Power for Power System of Puerto Rico at Jobos Power Plant from 1/6/2020 to 8/1/2020.

The location of the Peaking Generator Units and capacities are as follows:

Location Aguille, 8 units (50 MW each) Capacity: 400Mw  
 Lat [REDACTED] Long [REDACTED]

Location 2 Cambalache, unit (82.5 MW each) Capacity: 82.5Mw

Lat [REDACTED] Long [REDACTED]

Location 3 Mayaguez, 2 units (55 MW each) Capacity: 0Mw

Lat [REDACTED] Long [REDACTED]

Location 4 Daguao, 2 units (2 MW each) Capacity: 42Mw

Lat [REDACTED] Long [REDACTED]

Location 5 Vega Baja, 2 units (2 MW each) Capacity: 42Mw

Lat [REDACTED] Long [REDACTED]

Location 6 Yabucoa, 2 units (2 MW each) Capacity 42Mw

Lat [REDACTED] Long [REDACTED]

Location 7 Palo Seco, 9 units (2 or 27 MW each) Capacity: 207Mw

Lat [REDACTED] Long [REDACTED]

Location 8 Jobos, 2 Units (2 MW each) Capacity: 42Mw

Lat [REDACTED] Long [REDACTED]

## Final Scope

### 380820 Earthquake Peaking Units

\*\*\*\*\* VERSION 2 \*\*\*\*\*

**Version 2 has been created to cover cost change due to extension of performance period 8/1/2020-1/1/2021**

SOW from previous version has been removed from current SOW. It can be found in the "Versioning and Amendments" tab in GM.

#### Work to be Completed

The applicant utilized for account equipment for the Emergency Protective Measures caused by Cosecha's electric power plant failure due to damages received by the incident.

Provided electric power to the Puerto Rico electrical grid using peaking generation assets

- A. Aguadilla Power Plant \$ 95, 6, 91 41
- B. Cambalache Power Plan \$12, 17, 79 74
- C. Mayaguez Power Plant: \$13,052,381.84
- D. Daguao Power Plant: \$3,706,154.81
- E. Vega Baja Power Plant: \$2,046,898.42
- F. Yabucoa Power Plant: \$2,078,795.74
- G. Palo Seco Power Plant: \$23,531,889.38
- H. Jobos Power Plant: \$3,222,383.76

Determination memo #24896: \$-10,090,052.10

Amount obligated in version 0 for this period of work: \$-23,530,721.71

**Work to Be Completed Total: \$121,671,501.30**

Version 0: \$384,150,412.00

Version 1: Created to change a cost code from 9001 to 9008.

Version 2: Cost Change \$121,671,501.30 and date extension.

**Determination Memorandum:** this project contains an official Determination Memo for a total amount of \$10,090,052.10 that's been determined ineligible. For all information pertaining to this determination memo see document titled "DM24896 4473PREPAGM137955\_PW7 DM 20220720.pdf".

**Project Notes:**

1. All costs associated with this project have been validated using applicant provided historical data. See attachment labeled: ST137955 DR4473PR Cost Validation v2.xlsx. and FEMARspnLtr 4473PREPA7 TE 20210225.pdf

## Cost

Code	Quantity	Unit	Total Cost	Section
9008 (Equipment V2)	1.00	Lump Sum	\$121,671,501.30	Uncomp eted
9008 (Equipment V0,V1)	1.00	Lump Sum	\$384,150,412.00	Uncomp eted

CRC Gross Cost	\$505,821,913.30
Total Insurance Reductions	(\$130,681,001.00)
<hr/>	
CRC Net Cost	\$375,140,912.30
Federal Share (90.00%)	\$337,626,821.07
Non-Federal Share (10.00%)	\$37,514,091.23

## Award Information

### Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
0	Eligible	Awarded	PA-02-PR-4473-PW-00007(16)	\$317,364,041.00	75 %	\$238,023,030.75	10/9/2020
1	Pending	Awarded	PA-02-PR-4473-PW-00007(1328)	\$0.00	15 %	\$47,604,606.15	8/15/2022
2	Eligible	Awarded	PA-02-PR-4473-PW-00007(1 56)	\$57,776,871.30	90 %	\$51,999,184.17	10/14/2022

### Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
12/21/2020	4473DRPRP00000071	202026WG-12172020	12/16/2020	\$187,933,252.50
3/19/2021	4473DRPRP00000071	202026WG-03182021	3/17/2021	\$50,089,778.25
8/22/2022	4473DRPRP00000071	202026WG 08182022	8/17/2022	\$47,604,606.15
10/26/2022	4473DRPRP00000071	202026WG-10252022	10/24/2022	\$51,999,184.17

### Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #

## **Subgrant Conditions**

- As described in 2 CFR, Part 200 § 200.333, financial records, supporting documents, statistical records and other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a sub-recipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions, Part 200.333, (a) – (f), (1), (2). A records relative to this Project Worksheet are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- In the seeking of proposals and letting of contracts for eligible work, the applicant/Subrecipient must comply with its Local State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the applicant's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work. Project Worksheets written as large projects (costs above the large project threshold) are reimbursed based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding \$5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- The terms of the FEMA-State Agreement are incorporated by reference into this project award under the Public Assistance grant and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Policy and Program Guide; and other FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the date of the declaration of this major disaster are incorporated by reference into this project award under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at 2 C.F.R. pt. 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. pt. 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The applicant must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the applicant commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay any duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If a subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.

## **Insurance**

### **Additional Information**

8/1/2022

## **GENERAL INFORMATION**

Event: 4473DR-PR

Project: ST 137955

Category of Work: Cat B - Emergency Protective Measures

Applicant: PR Electric Power Authority

Event Type: Earthquake / Earthquake

Cause of Loss: Earthquake

Incident Period: 12/28/2019 to 7/3/2020

Total Public Assistance Amount: \$505,821,913.30

## **COMMERCIAL INSURANCE INFORMATION**

Does the Applicant have a Commercial Policy: Yes

Policies Issued by: Mapfre, Willis Towers Watson and Mutual National Insurance Company

Policies Numbers: Mapfre Praha Insurance Company (1398198000640)

Willis Towers Watson (B0804Q21251F19, B0804Q21426F19, B0804Q18529F19, B080423147F19, B0804Q11038F19, B0804Q23134F19, B0804Q23124F19, B0804Q18529F19, B0804Q23133F19, B0804Q21271F19, B0804Q21426F19, B0804Q14312F19)

Mutual National Insurance Company (CP-319974-1, CP-319970-1, CP-327903-0, CP-319973-1, CP-327905-0, CP-319979-1, CP-318673-2, CP-319971-1, CP-327902-0, CP-327901-0, CP-318677-2, CP-319968-1)

Policy Period: From: Mapfre 5/31/2019 To: 5/31/2020

Policy Limits: \$300,000,000.00 combined single limit property damage and business interruption each and every occurrence which in turn excess of policy deductibles each and every occurrence.

RCV or ACV: Replacement Cost Value

Deductible Amount: \$25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm and Earthquake.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: Yes

The amount of the deductible being funded in this project is \$36,433,367.00 (30-day)

Final Insurance Settlement Status: Insurance proceeds for this project are apportioned

The amount of Apportioned Insurance Proceeds applied to this Project: \$130,681,001.00

## **NUMBER OF DAMAGED INVENTORIES INCLUDED IN THIS PROJECT: (1)**

### **Damaged Inventory (DI) #380820:**

#### ***Emergency Protective Measures (Peaking Units)***

Number of damaged locations included in this DI: (8)

Locations Description: Peaking Generators in Aguadilla Power Plant, Camaguey Power Plant, Mayaguez Power Plant, Dagupao Power Plant,

Vega Baja Power Plant, Yabucoa Power Plant, Palo Seco Power Plant and Jobos Power Plant.

GPS Coordinates:

Location 1. Aguirre, 8 units (50 MW each) Capacity: 400Mw

Lat. [REDACTED] Long [REDACTED]

Location 2. Camaguey, 1-unit (82.5 MW each) Capacity: 82.5Mw

Lat. [REDACTED] Long [REDACTED]

Location 3. Mayaguez, 2 units (55 MW each) Capacity: 110Mw

Lat. [REDACTED] Long [REDACTED]

Location 4. Dagupao, 2 units (21 MW each) Capacity: 42Mw

Lat. [REDACTED] Long [REDACTED]

Location 5. Vega Baja, 2 units (21 MW each) Capacity: 42Mw

Lat. [REDACTED] Long. [REDACTED]

Location 6. Yabucoa, 2 units (21 MW each) Capacity 42Mw

Lat. [REDACTED] Long. [REDACTED]

Location 7. Palo Seco, 9 units (21 or 27 MW each) Capacity: 207Mw

Lat. [REDACTED] Long. [REDACTED]

Location 8. Jobos, 2 Units (21 MW each) Capacity: 42Mw

Lat [REDACTED] Long. [REDACTED]

Cause of Loss: Earthquake

SOV / Schedule #: Business Interruption-locations

SOV / Schedule Amount: \$750,000,000.00

Applicable Deductible Amount: \$36,433,367.00 (30-day)

Damage Inventory Amount: \$505,821,913.30

-

Property and Maintenance Requirements:

No property requirements were found for this facility.

-

Reduction(s):

A reduction is being made for anticipated insurance proceeds in the amount of \$130,681,001.00. The 30-day deductible in the amount of \$36,433,367.00 will be covered as part of the project costs. Please see, "Insurance Location 4473 vF na IM" and "Extra Expense Claim 08012022" files.

On a letter from PREPA to COR3 dated February 3, 2022, the Applicant provided a revised location plan for the anticipated insurance

proceeds for the earthquake, FEMA-4473-DR-PR. It replaces previous aocation letter dated July 8, 2020. PREPA's request to FEMA to apply an anticipated insurance reduction of \$130,681,001.00 to emergency work projects. Please see; "Insurance Allocation 4473 vFNA IM" file. Pursuant to Section 312 of the Stafford Act, Duplication of Benefits, the actual insurance proceeds recovered by PREPA must be deducted from eligible projects amount. FEMA may reevaluate PREPA's insurance allocation plan to apply insurance reductions to any eligible project(s) with insured damages to avoid duplication of benefits.

#### Obtain and Maintain Requirement:

No insurance requirements are mandated for the work described in this project. Insurance requirements are specific to permanent work to replace, restore, repair, reconstruct, or construct buildings, contents, equipment, and vehicles (FEMA Recovery Policy FP 206-086-1).

#### Insurance Proceeds Statement:

FEMA acknowledges that the applicant is in negotiations with the insurance carrier at the time of the FEMA insurance review and might have received partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy amounts. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that they are entitled to receive from insurers. FEMA will consider final insurance settlements that may be less than the insurance policy amounts when an applicant demonstrates that they have taken reasonable efforts to recover insurance proceeds that they are entitled to on a case-by-case basis.

#### Standard Insurance Comments

##### FEMA Policy 206-086-1

##### **PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)**

A. **Duplication of Benefits.** FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery they are entitled to for that property.
2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.
3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from the insurer(s).

**Jean-Carlo Echevarria, PA Insurance Specialist**

**CRC Atlantic, Guaynabo, PR**

#### **O&M Requirements**

There are no Obtain and Maintain Requirements on  
**Earthquake Peaking Units.**

#### **Environmental Historical Preservation**

I think project compliant with EHP laws, regulation, and executive orders?

**Yes**

#### **EHP Conditions**

- Any change to the application over the scope of work will require evaluation for compliance with NEPA and other Law and Executive Orders.
- This review does not address federal, state and local requirements. Acceptance of federal funding requires recipient to comply with federal, state and local laws. Failure to obtain appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will notify the State and FEMA if any potentially archaeologically resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- The Applicant is responsible for meeting all reporting requirements and conditions listed in the EPA's No Action Assurance for Puerto Rico Power Authority for Fuel Consumption and Analysis (NAA) and all reporting requirements and conditions listed within subsequent extensions of the NAA.

## EHP Additional Info

There is no additional environmental historical preservation on **Earthquake Peaking Units**.

## Final Reviews

### Final Review

**Reviewed By** MARTINEZ SANTIAGO, ISRAEL

**Reviewed On** 08/05/2022 3:18 PM AST

#### Review Comments

FEMA final completed and all documents were uploaded by the Applicant. Project ready for Recipient Review.

### Recipient Review

**Reviewed By** Cintron, Jesus

**Reviewed On** 08/05/2022 4:56 PM AST

#### Review Comments

Recipient Final Review Completed. Pending Applicant Final Review

## Project Signatures

**Signed By** Nieve, Ezequiel

**Signed On** 08/05/2022

**From:** [John Rosado](#)  
**To:** [Cruz Rivera, Brendaly \(AAPP\)](#)  
**Cc:** [González Bonilla, Pedro J. \(AAPP\)](#); [Rovira Pérez, Zulma N. \(AAPP\)](#); [Ezequiel J Nieves Ayala](#); [Suzzette Diaz](#); [Cintrón Rivera, Jesús M. \(AAPP\)](#)  
**Subject:** Re: RFI Hold - PW00007 - RFR0020663 - \$157,510,613.30 - PREPA - DR4473  
**Date:** Tuesday, October 18, 2022 4:42:48 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[DR-4473-Peaking unit Calculation Narrative.pdf](#)

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Hello Brendaly!

Please find below clarifications to the request for PW0007

The claim on DR 4473-PW0007 is for the fuel consumption on multiple PREPA peaking units as a result of the January 2020 earthquakes. PREPA was forced to use the peaking generators to provide power to critical facilities and functions. This resulted in these units no longer being used for their intended purpose as peaking units, where they would supplement the power provided by the base units, but instead they have been run much more constantly to provide base power for critical facilities and functions and as an emergency protective measure to restore power.

Fuel consumption and fuel prices in the Peaking Generation Analysis are based on the Fuel Oil Consumption Report ("Report" or the "J-28 Report") prepared by the Finance Department. The Report is based on measurements taken at the generation facilities as well as invoice data and/or data provided by the Fuel office. Fuel is accounted for on a weighted average price basis for consumption and inventory. The J-28 Report is one of the sources of data that is used in the development of rates.

Such methodology is built up in a manner similar to that which would be used to develop a FEMA reimbursable generation rate. The analysis incorporates the decline in value of these assets due to use, the cost of fuel and both fixed and variable O&M.

Please refer to DR-4473- Peaking unit Calculation Narrative attached for a detail description of reports and calculation methodology. Also as part of the documentation provided for the RFR you have available the Fuel Reports for each month, which detail the consumption and inventory.

The same documentation provided as support for this PW was submitted for the Irma and Maria Peaking Units Claims and were validated by FEMA, COR3 and ultimately by FEMA VAYGo.

If you have any doubts or questions, please don't hesitate to contact us.

Thanks



**John Rosado**  
Asst. Program Manager  
PREPA Grants Management  
**Mobile : 939-292-4610**  
**Email : [jrosado@arigroupllc.com](mailto:jrosado@arigroupllc.com)**

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**From:** "Cruz Rivera, Brendaly (AAPP)" <BCruzRivera@cor3.pr.gov>  
**Date:** Tuesday, October 18, 2022 at 3:45 PM  
**To:** John Rosado <jrosado@arigroupllc.com>  
**Cc:** "González Bonilla, Pedro J. (AAPP)" <PGonzalez@cor3.pr.gov>, "Rovira Pérez, Zulma N. (AAPP)" <ZRovira@cor3.pr.gov>  
**Subject:** RFI Hold - PW00007 - RFR0020663 - \$157,510,613.30 - PREPA - DR4473

Good afternoon,

We received the Request for Reimbursement for Disaster 4473, PW00007, Puerto Rico Electric Power Authority (PREPA), totaling \$157,510,613.39 (attached). In reviewing, we have encountered a few questions. This RFR affects \$157,510,613.39 of the requested RFR:

1. Force Account Equipment – list issue. – please provide following documents:
  - a. Explanatory Memorandum in order to clarify if the fuel was purchase or used from the Reserve.
  - b. An Inventory Report if the Fuel was used from the Reserve to know the fuel balance before and after the disaster.

Please provide a response by the close of business on DATE (10/31/2022, according to date of RFI issue and SOP number of days allowed for RFI).

Without the documentation/clarifications listed above, this RFR can be processed with a no-payment recommendation. The reimbursement for this RFR will move forward at the conclusion of this timeline based on the COR3 Chapter 7 policy.

If you have any questions, please feel free to contact me, Brendaly Cruz at BCruzRivera@cor3.pr.gov or Pedro J. Gonzalez at PGonzalez@cor3.pr.gov.

Thank You,



**Brendaly Cruz Rivera**  
Grant Agencies Supervisor  
Mobile: 787-366-0805  
Email: [bcruz@cor3.pr.gov](mailto:bcruz@cor3.pr.gov)  
Web: <https://www.recovery.pr/>



Central Recovery and Reconstruction Office of Puerto Rico (COR<sup>3</sup>)

Puerto Rico Public-Private Partnerships Authority

PO Box 195014 San Juan, PR 00918-5014

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**From:** [Suzette Diaz](#)  
**To:** [Soto Toro, Hildelix](#)  
**Subject:** Peaking Units  
**Date:** Tuesday, October 4, 2022 11:47:00 AM  
**Attachments:** [Att. 11 - Correspondence between FEMA PD TFL and FEMA Energy Sector Lead \(May 29-June 1, 2020\).pdf](#)  
[image001.png](#)

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Throughout May 2020, PREPA continued to operationally analyze the qualifying lease proposals to the RFP. As PREPA delved deeper into the operational analysis, it became apparent that leasing temporary units would be both impractical to meet PREPA's emergency power needs and exorbitantly expensive as compared to PREPA's cost of continuing to provide emergency power via the peaking units. From an operational standpoint, the locations where the leased power facilities would be placed did not align with the location of the peaking units, which had been built to accommodate PREPA's transmission and distribution grid.<sup>19</sup> As such, PREPA would be required to make additional accommodations to ensure that leased power could be properly transmitted and distributed to emergency facilities and vulnerable populations.

From a cost standpoint, PREPA estimated that the total cost of providing emergency power for a six-month lease term would be over \$60 million per month.<sup>20</sup> By May, PREPA had four months of actual cost data associated with providing emergency power via the peaking units. During that four-month period, the total monthly cost of providing emergency power with the peaking units had exceeded \$60 million only once, and it was on a downward trend.<sup>21</sup>

Additionally, PREPA estimated that repairs to bring Costa Sur Unit 5 back in service would be completed in August. Once Unit 5 was back in service, it would add substantial capacity, and PREPA anticipated that the amount of emergency power required would diminish. Further, based on the anticipated delivery schedules of the leased units, it was likely that many would not be available to supplement emergency power to PREPA's grid until after Unit 5 repairs were complete. Given that scenario, PREPA was concerned that it would pay costly lease rates for temporary units that may not be necessary to augment PREPA's power supply. Hence, if PREPA leased temporary generation units for a six-month term, the amount of fuel required for emergency power would diminish as the Costa Sur power plant gained capacity, but the \$24 million per month equipment rental cost would remain the same regardless of whether PREPA still needed leased units to add 416.13 MW of capacity to its grid.

At a late-May 2020 eligibility meeting among officials from PREPA, FEMA, and Puerto Rico's Central Office for Recovery, Reconstruction, and Resiliency ("COR3"), PREPA raised the possibility of not leasing temporary power and instead continuing to use the peaking units to provide emergency power until Costa Sur's generating capacity could be restored.<sup>22</sup> FEMA leadership followed that meeting with an internal discussion as to whether PREPA's costs to continue running the peaking units beyond the original July 14 deadline could remain eligible until the Costa Sur repairs were complete in lieu of PREPA leasing temporary generation units.<sup>23</sup> In that discussion, FEMA concluded that it would be possible for PREPA's peaking unit costs to remain eligible beyond the original July 14 deadline, "if the temporary generation is not implemented."<sup>24</sup>

At that point in time, PREPA had not made a final decision to decline the leasing offers. As of June 1, 2020, FEMA leadership resolved to wait a "couple of weeks" for PREPA to determine whether "the Temp Gens will be put in place or not based on the success, or not, of PREPA bringing more base

load generation on-line.”<sup>25</sup> FEMA leadership further acknowledged that, in the event that PREPA opted not to lease temporary generation units, “A new reasonable date will need to be established as the cut-off.”<sup>26</sup>

In the weeks following that discussion, PREPA continued to be pleased with the progress of repairs to Costa Sur Unit 5, and the projected August completion of that project appeared attainable. As a result, PREPA decided to decline the offers for leased generating units and seek an extension of time for peaking unit eligibility.



**Suzzette Díaz, CPA**

President

**Mobile :** 787-486-9484

**Email :** [sdiaz@arigroupllc.com](mailto:sdiaz@arigroupllc.com)



# GOBIERNO DE PUERTO RICO

## AUTORIDAD DE ENERGÍA ELÉCTRICA

### Anejo A-2

[Versión nativa enviada por correo electrónico el NEPR para que  
lo suba a su página web]



## Reclamación DR-4473-007 Resumen

Periodo Enero 2020 - Enero 2021

Concepto de Costos	Total Reclamación	Cantidad Aprobada	Cantidad bajo Apelación
Combustible:	\$ 375,006,183 B	\$ 368,606,766	\$ 6,399,418
O & M:	140,905,782	137,215,148	3,690,634
<b>Total</b>	<b>\$ 515,911,965</b>	<b>\$ 505,821,913</b>	<b>\$ 10,090,052</b>
Seguro <sup>C</sup>	\$ 130,681,001	\$ 130,681,001	\$ -
Porción a Reembolso Federal	385,230,964	375,140,912	10,090,052
<b>Pareo Federal (90%)<sup>A</sup></b>	<b>\$ 346,707,868</b>	<b>\$ 337,626,821</b>	<b>\$ 9,081,047</b>

<sup>A</sup> De conformidad con la enmienda al acuerdo entre la Agencia Federal para el Manejo de Emergencias y la Oficina Central de Recuperación, Reconstrucción y Resiliencia el pasado 11 de marzo de 2022 para las subvenciones bajo FEMA-4473-DR.

<sup>B</sup> El gasto total de combustible en el periodo de la reclamación.

<sup>C</sup> Las cantidades de seguro están sujetas a cambios. Una vez se culmine con la reclamación de seguro las cantidades a FEMA se ajustarán para reflejar el cambio en los proyectos.

### Reducción por concepto de Seguro por combustible:

	SEGURO	FEMA	TOTAL
Combustible:	130,681,001.00	244,325,182.32 D	\$ 375,006,183.32 B
O & M:	-	140,905,782.07	\$ 140,905,782.07
<b>Total</b>	<b>130,681,001.00</b>	<b>385,230,964.39</b>	<b>\$ 515,911,965.39</b>

### Reducción por Pareo Local

	100%	90%	TOTAL
Total de Combustible a recibirse:	130,681,001.00	219,892,664.09	<b>\$ 350,573,665.09</b>
<b>D x 90% = E</b>			

	TOTAL	Recibido	Pendiente
Combustible Rembolsable por FEMA	219,892,664.09	214,133,188.24	5,759,475.85
Combustible Rembolsable por Seguro	130,681,001.00	61,000,000.00	69,681,001.00
<b>Total</b>	<b>\$ 350,573,665.09</b>	<b>\$ 275,133,188.24</b>	<b>\$ 75,440,476.85</b>

### Porción de Combustible sobre Proyecto de FEMA:

	Total FEMA	Ajuste DM	Aprobado
Total de Combustible a recibirse	244,325,182 #	(6,399,418)	237,925,765 G
Porción de O&M	140,905,782 #	(3,690,634)	137,215,148
<b>Total</b>	<b>385,230,964 F</b>	<b>(10,090,052)</b>	<b>375,140,912</b>

	G x 90%	
	100%	90%
Combustible a recibirse luego de DM:	130,681,001	214,133,188
		<b>344,814,189 H</b>

Resolución y Orden emitida por el NEPR - 31 de marzo de 2021	316,548,997
Resolución y Orden emitida por el NEPR - 31 de julio de 2022	34,024,668
<b>Total Diferido</b>	<b>350,573,665</b>
<b>Nuevo total de Combustible</b>	<b>344,814,189 H</b>
	<b>5,759,476 Exceso diferido</b>

PREPA - Peaking Generator Analysis for Earthquakes  
For the period - January 2020 to January 2021

Plant	Description	January	February	March	April	May	June	July	August	September	October	November	December	January
		1/1 - 1/31	2/1 - 2/29	3/1 - 3/31	4/1 - 4/30	5/1 - 5/31	6/1 - 6/30	7/1 - 7/31	8/1 - 8/31	9/1 - 9/30	10/1 - 10/31	11/1 - 11/30	12/1 - 12/31	1/1 - 1/31
Aguirre	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	21,348,823	26,999,051	18,514,408	19,344,681	14,531,076	14,989,949	18,334,185	16,556,865	10,230,439	15,916,144	9,820,679	8,328,859	5,303,920
	Variable and Fixed O&M Costs	4,942,896	6,661,903	5,847,063	6,924,269	7,183,800	6,715,873	6,853,948	6,171,985	4,666,167	6,048,366	4,609,120	4,324,864	3,358,984
Cambalache	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	9,265,852	8,303,337	2,993,363	2,876,842	4,391,252	1,838,459	3,224,628	3,091,888	2,098,700	2,295,778	1,458,977	1,362,144	524,655
	Variable and Fixed O&M Costs	391,086	413,167	267,627	279,313	364,540	258,465	317,961	305,203	262,551	271,371	227,653	228,592	189,867
Mayaguez	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	3,548,543	3,873,558	2,078,296	2,501,147	2,958,331	3,244,355	4,240,479	3,795,098	2,063,490	2,337,797	604,452	1,372,298	399,417
	Variable and Fixed O&M Costs	394,547	474,678	381,603	442,266	543,100	624,085	689,434	651,785	468,006	503,798	267,207	351,689	237,344
Dagupao	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	2,062,683	1,352,815	310,681	892,165	978,944	475,052	769,616	645,785	698,753	641,279	431,056	294,199	90,951
	Variable and Fixed O&M Costs	238,106	202,560	118,290	166,211	175,763	134,870	190,908	172,613	180,832	177,358	144,664	127,661	101,004
Vega Baja	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	6,281	598,449	254,138	369,058	144,295	81,386	166,250	106,424	291,060	477,032	160,905	173,799	102,451
	Variable and Fixed O&M Costs	75,153	137,535	116,311	129,014	123,400	109,163	112,979	106,437	137,899	153,872	115,423	115,423	106,174
Yabucoa	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	1,186,242	613,218	210,793	396,158	360,424	304,428	295,894	181,365	391,892	376,050	93,673	303,511	12,810
	Variable and Fixed O&M Costs	170,765	144,846	111,984	130,871	129,741	126,732	126,631	116,392	132,648	143,614	104,094	128,388	94,360
Palo Seco	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	10,425,840	10,034,776	9,838,835	8,828,660	7,788,148	7,408,959	9,076,020	5,192,992	1,419,381	2,381,514	1,097,884	471,000	336,245
	Variable and Fixed O&M Costs	4,136,587	4,891,279	6,201,735	4,826,395	5,562,713	5,693,637	5,561,016	3,585,931	1,919,778	2,300,859	1,784,134	1,553,861	1,488,310
Jobos	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	1,118,285	763,956	286,520	394,900	717,960	390,247	415,301	361,386	664,711	991,421	118,437	180,531	38,096
	Variable and Fixed O&M Costs	170,423	167,867	120,956	139,514	189,515	148,844	147,762	141,958	179,782	224,087	108,557	116,089	97,329
Total Period Costs	Depreciation Expense	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Fuel Costs	48,962,550	52,539,158	34,487,033	35,603,610	31,870,430	28,732,836	36,522,374	29,931,803	17,858,426	25,417,015	13,786,064	12,486,341	6,808,545
	Variable and Fixed O&M Costs	10,519,562	13,093,835	13,165,570	13,037,853	14,272,571	13,811,669	14,000,640	11,252,303	7,947,662	9,823,327	7,360,852	6,946,566	5,673,372
<b>Total</b>		<b>\$ 59,482,111</b>	<b>\$ 65,632,994</b>	<b>\$ 47,652,603</b>	<b>\$ 48,641,463</b>	<b>\$ 46,143,001</b>	<b>\$ 42,544,505</b>	<b>\$ 50,523,013</b>	<b>\$ 41,184,106</b>	<b>\$ 25,806,088</b>	<b>\$ 35,240,342</b>	<b>\$ 21,146,916</b>	<b>\$ 19,432,907</b>	<b>\$ 12,481,917</b>

**Notes:**  
Based on reimbursements approved by FEMA in the prior PW submitted  
following Hurricane Maria, PREPA is not seeking reimbursement for depreciation.

21,549,627

Category	Sub-Category	Parameter	Value
General Parameters	System	Processor	i7-7700K
		Cooling	Water Block
		Power Supply	EVGA SuperNOVA 850
		GPU	RTX 2080
		SSD	Western Digital Black SN750 NVMe
		HDD	Samsung 860 QVO 2TB
		RAM	Corsair Vengeance LPX 32GB (2x16GB)
		Motherboard	ASUS ROG Strix Z370-E Gaming
		Case	Gigabyte AORUS M3
		Power Connectors	PCIe 3.0 x16
Performance Tuning	CPU	Overclocking	10%
		Cooling	Optimized
		Power	Max
		Memory	Optimized
		SSD	Optimized
		HDD	Optimized
		GPU	Optimized
		Power Connectors	Optimized
		Power Supply	Optimized
		Processor	Optimized
System Configuration	CPU	Processor	i7-7700K
		Cooling	Water Block
		Power Supply	EVGA SuperNOVA 850
		GPU	RTX 2080
		SSD	Western Digital Black SN750 NVMe
		HDD	Samsung 860 QVO 2TB
		RAM	Corsair Vengeance LPX 32GB (2x16GB)
		Motherboard	ASUS ROG Strix Z370-E Gaming
		Case	Gigabyte AORUS M3
		Power Connectors	PCIe 3.0 x16
Performance Tuning	CPU	Overclocking	10%
		Cooling	Optimized
		Power	Max
		Memory	Optimized
		SSD	Optimized
		HDD	Optimized
		GPU	Optimized
		Power Connectors	Optimized
		Power Supply	Optimized
		Processor	Optimized
System Configuration	CPU	Processor	i7-7700K
		Cooling	Water Block
		Power Supply	EVGA SuperNOVA 850
		GPU	RTX 2080
		SSD	Western Digital Black SN750 NVMe
		HDD	Samsung 860 QVO 2TB
		RAM	Corsair Vengeance LPX 32GB (2x16GB)
		Motherboard	ASUS ROG Strix Z370-E Gaming
		Case	Gigabyte AORUS M3
		Power Connectors	PCIe 3.0 x16

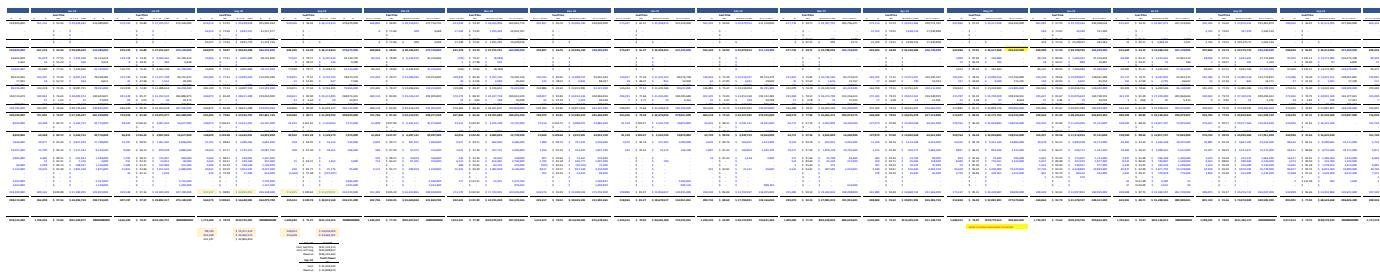
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1.5	-2.0000000000000000e+000
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-1.5	-4.0000000000000000e+000
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Group	Subgroup	Parameter	Description	Initial Value	Min Value	Max Value
System	System	Log-Period	Logarithmic step size for initial parameter search	10	2	50
	System	Step-Size	Step Size for initial parameter search	10	2	50
Model	Model	Step-Size	Step size for model parameter search	10	2	50
	Model	Step-Size	Step size for model parameter search	10	2	50
	Model	Step-Size	Step size for model parameter search	10	2	50
	Model	Step-Size	Step size for model parameter search	10	2	50
Model	Model	Step-Size	Step size for model parameter search	10	2	50
	Model	Step-Size	Step size for model parameter search	10	2	50
	Model	Step-Size	Step size for model parameter search	10	2	50
Process	Process	Step-Size	Step size for process parameter search	10	2	50
	Process	Step-Size	Step size for process parameter search	10	2	50
Estimator	Estimator	Step-Size	Step size for estimator parameter search	10	2	50
	Estimator	Step-Size	Step size for estimator parameter search	10	2	50











Year	State	Category	Value
2015	California	Commercial buildings	21%
2015	California	Residential buildings	21%
2015	California	Transportation	19%
2015	California	Industry	17%
2015	California	Electric power generation	12%
2015	California	Waste	1%
2015	California	Water supply	1%
2015	California	Total	100%
2015	Nevada	Commercial buildings	20%
2015	Nevada	Residential buildings	22%
2015	Nevada	Transportation	20%
2015	Nevada	Industry	18%
2015	Nevada	Electric power generation	12%
2015	Nevada	Waste	1%
2015	Nevada	Water supply	1%
2015	Nevada	Total	100%
2016	California	Commercial buildings	21%
2016	California	Residential buildings	21%
2016	California	Transportation	19%
2016	California	Industry	17%
2016	California	Electric power generation	12%
2016	California	Waste	1%
2016	California	Water supply	1%
2016	California	Total	100%
2016	Nevada	Commercial buildings	20%
2016	Nevada	Residential buildings	22%
2016	Nevada	Transportation	20%
2016	Nevada	Industry	18%
2016	Nevada	Electric power generation	12%
2016	Nevada	Waste	1%
2016	Nevada	Water supply	1%
2016	Nevada	Total	100%

