

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

**NEPR**

**Received:**

**Mar 3, 2023**

**12:11 PM**

**IN RE:** ENMIENDAS A CONTRATO DE  
COMPRAVENTA DE ENERGÍA:  
PROYECTO NO-OPERACIONAL  
(XZERTA-TEC SOLAR I, LLC)

**CASE NO.:** NEPR-AP-2021-0002

**SUBJECT:** Submittal of Certification  
Regarding Xzerta January 2023 Progress  
Report

**MOTION TO SUBMIT CERTIFICATION REGARDING XZERTA JANUARY 2023  
PROGRESS REPORT**

TO THE HONORABLE ENERGY BUREAU:

**COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC** (collectively “LUMA”) through their undersigned legal representatives and respectfully submit and request the following:

1. On May 11, 2021, the Energy Bureau of the Public Service Regulatory Board (the "Bureau" or "Energy Bureau") issued a *Final Determination and Order* (the "Final Resolution") approving, subject to certain conditions, the *Petition for Approval of Amendment to Renewable Power Purchase Agreement with Xzerta-Tec Solar I, LLC*<sup>1</sup> (the "Petition") filed by the Puerto Rico Electric Power Authority (“PREPA”) on March 17, 2021, for the Bureau's approval of such amended agreement<sup>2</sup>.

2. The Final Resolution orders that, among other things, PREPA and Xzerta Tec Solar I, LLC (“Xzerta”) file with the Energy Bureau monthly progress reports ("Progress Report(s)") on the

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<sup>1</sup> *Petición de Aprobación de Enmienda a Contrato de Compraventa de Energía Renovable con Xzerta-Tec Solar I, LLC.*

<sup>2</sup> *Amended and Restated Renewable Power Purchase and Operating Agreement between the Puerto Rico Electric Power Authority and Xzerta Tec Solar LLC* dated June 4, 2021 (2013-P00042E).

status of Xzerta's renewable energy project. In addition, on February 9, 2022, the Bureau issued a *Resolution and Order* ("February 9<sup>th</sup> Order") whereby, in particular, it ordered that PREPA and Xzerta submit the Progress Reports signed by officials of each entity and include therein the date of their preparation.

3. On November 10, 2022, the Bureau issued a *Resolution and Order* ("November 10<sup>th</sup> Order"), ordering LUMA to appoint a representative to appear and participate in the certification of the Progress Reports.

4. On November 21, 2022, LUMA informed this Energy Bureau of the person appointed for the participation in the certification of the Progress Reports. *See Joint Motion Regarding Order of November 10, 2022* filed by LUMA and PREPA on that date. LUMA has been issuing certifications with its comments to the Progress Reports since then (commencing with the November 2022 Progress Report). *See PREPA's Motion to Present Monthly Progress Report Corresponding to November 2023*, filed on December 30, 2022, and its Attachment B, and PREPA's *Motion to Present Monthly Progress Report Corresponding to December 2023*, filed on January 31, 2022, and its Attachment B.

5. On February 28, 2023, PREPA submitted to the Energy Bureau Xzerta's January 2023 Progress Report ("Xzerta January 2023 Report"). *See PREPA's Motion to Present Monthly Progress Report Corresponding to January 2023* of that date. Due to involuntary inadvertence, at the time of the foregoing filing, LUMA had not submitted to PREPA LUMA's certification regarding Xzerta's January 2023 Progress Report, although LUMA did review and prepare this certification by February 16, 2023 which LUMA respectfully submits to the Energy Bureau herein. *See Exhibit I.*

WHEREFORE, LUMA respectfully requests the Energy Bureau to take notice of the  
aforementioned.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 3<sup>rd</sup> day of March 2022.

We hereby certify that we will file on this date this Motion using the electronic filing system of this Energy Bureau and will send an electronic copy of this Motion to counsel for PREPA Joannely Marrero-Cruz, [jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law) and to [fernandomolini@tycroesgroup.com](mailto:fernandomolini@tycroesgroup.com).



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*Exhibit1*

*LUMA Certification and Comments related to Xzerta January 2023 Progress Report*

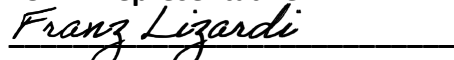


## STATEMENT REGARDING XZERTA TEC SOLAR I, LLC MONTHLY STATUS PROGRESS REPORT FOR January 2023

For purposes of compliance with the Puerto Rico Energy Bureau's ("PREB") Resolution and Order of November 10, 2022, in Case NEPR-AP-2021-0002 (*Enmiendas a Contrato de Compraventa de Energía: Proyecto No-Operacional (Xzerta-Tec Solar I, LLC)*), LUMA Energy ServCo, LLC ("LUMA") hereby informs that LUMA:

- has reviewed the referenced monthly progress report prepared by Xzerta Tec Solar I, LLC dated February 5, 2023 and submitted to the Puerto Rico Electric Power Authority (the "Xzerta Report"), which report is to be filed with the Puerto Rico Energy Bureau ("PREB") as per PREB's Final Determination and Order of May 11, 2021 in the same case; and
- does not have reason to disagree with the information in the Xzerta Report, **except as otherwise indicated in or subject to**, LUMA's comments included in the attached document which replicates the tables of activities and status thereof in the Xzerta Report and includes a column added by LUMA to include LUMA's comments for purposes of clarifying, updating or correcting the information in the report.

LUMA Representative:

A handwritten signature in black ink, reading "Franz Lizardi", is written over a horizontal line.

Name: Franz Lizardi, PE

Title: Project Manager, Utility-Scale Renewables, Capital Programs

Date: February 16, 2023



# LUMA Comments to XZERTA Monthly Report

January 2023

| # | Activity                                   | Description  | Status               | Comments  |                              |
|---|--|--|----------------------|---|------------------------------|
| 1 | Design                                     |  |                      |   |                              |
|   | A. Power Design - Drawings                 | Xzerta provided the 13th revision of the drawings and the relay study on 10/28/2022, which included all changes as per Luma's comments. On 11/23/2022, a 14th revision was provided with the proposed route as conceptual design of the transmission line to request for a 3rd time the permits for usage of the PREPA's easement. This item is not required for the fulfillment of Article 4.1. As of 11/4/2022, Sargent & Lundy, as the CTE firm assigned by PREPA to perform the interconnection study and the facility study, proceeded with the evaluation of all design documents provided by Xzerta. Xzerta provided on 12/22/2022 a revised PSSE files as per the comments provided by S&L on 12/07/2022. Xzerta provided the updated PSCAD once again on 01/25/2023. As of 01/24/2023, S&L confirmed that the PSSE files passed all MTRs. The final study should be released mid-February. This study is necessary for the final detail design and proper integration of the interconnection. | Submitted            | Design Documents Under S&L review and pending completion of the interconnection study and facility study as per Article 4.2. Results are pending LUMA / PREPA approval as per Article 4.2 and 9.4 for release to Xzerta for completion of final design. | No action pending from LUMA. |
|   | B. Energy Yield Assessment and Relay Study | Relay Study was submitted on Sept 21, 2022, and the Energy Yield Assessment was submitted for approval on Sept 30 <sup>th</sup> , 2022.  | Waiting for approval | Design Documents Under S&L review and pending completion of the interconnection study and facility  | No action pending from LUMA. |

# LUMA Comments

| # | Activity    | Description   | Status  | Comments  |   |
|---|-------------|---|---|---|---|
|   |             |   |   | study as per Article 4.2. Results are pending LUMA / PREPA approval as per Article 4.2 and 9.4 for release to Xzerta for completion of final design.  |   |
|   | C. Products | <p>Proposed products and Models for the interconnection have been submitted to LUMA for approval.</p> <p>Documentation for the inverters, batteries, Transformer, Protective relays and MV switchgear were transmitted for approval, but LUMA stated that they will not approve any Products related to the solar farm but only the interconnection. LUMA stated it will be handled as for information only. It is important to clarify that this distinction between the materials or equipment that will be utilized for the facility vs the stepup transformer to point of connection does not exist in the contract. As per article 4.2 and 9.4, the design including the facility and products will require to be approved by PREPA and/or their representative.</p> <p>LUMA have approved with comments the proposed gas circuit breaker from the manufacturer, Hitachi. LUMA responded to RFI 011- Request</p> | Waiting for completion of the interconnection study and facility study as per LUMA responses of Xzerta RFI's. | <p>We are waiting for the approval of the protective relays. GCBs was approved with a note to increase the capacity of the GCB 1. Step Up 3P Main Transformer was not officially approved like other products pending for the results of the interconnection study. At this point, XZERTA has not issued the orders of equipment due to the high risk of not having proper approval of products. Equipment manufacturing lead times can severely affect proposed schedule</p> | <b>Completion of the Interconnection studies is necessary for approvals of the protective relays and other equipment. (No change from Nov. 2022 report)</b> |



## LUMA Comments

| # | Activity         | Description  | Status                               | Comments  |  |
|---|------------------|--|--------------------------------------|---|--|
|   |                  | Step up Oil 3P Power Transformer that they did not have an exception to the proposed products, but their response should not be taken as approval as it is pending on the completion of the interconnection study. RFI 009 Request for Approval of Protective relays is still open.  |                                      |   |  |
|   | D. SCADA list    | Our team is in receipt of current SCADA list sample shared by LUMA. Based on this sample, our team will develop the preliminary SCADA Point list and will add all available alarms and events based on the final design. The list is pending on the completion of LUMA's analysis and study of our design to determine if additional protections, alarms, or other necessary points are required to be included in our design. | In progress                          | Under development while waiting for S&L's interconnection study and facility study results  | <b>Upon submission of the interconnection studies by S&amp;L and the submission of Xzerta of the SCADA points, LUMA will be able to conduct the appropriate analysis. This action is awaiting the S&amp;L study. (No change from Nov. 2022 report)</b> |
|   | E. Other Design  | Preliminary design for the transmission lines was submitted on 11/23/2022.   | In Progress                          | Waiting for S&L's interconnection study and facility study results  |  |
|   | F. Dynamic Study | Based on the preliminary design, Enerzinx has completed the dynamic study, and it was submitted for LUMA's review and approval back on July 2022. After a resolution of a commercial issue with LUMA, PREPA with Xzerta's approval   | Submitted and waiting for S&L review | Design Documents Under S&L review and pending completion of the interconnection study and facility study as per Article 4.2. Results are pending LUMA / PREPA approval as per Article 4.2 | <b>No action pending from LUMA.</b>  |

## LUMA Comments

| # | Activity   | Description   | Status             | Comments  |  |
|---|--|---|--------------------|---|--|
|   |  | assigned S&L. As of 11/04/2022, S&L is reviewing all design documents. Xzerta provided on 12/22/2022 a revised PSSE files as per the comments provided by S&L on 12/07/2022. As of 01/24/2023, S&L confirmed that the PSSE files were in compliance with PREPA MTRs. On 01/25/2023, Xzerta provided the updated PSCAD files.  |                    | and 9.4 for release to Xzerta for completion of final design.   |  |
|   | G. Winds Conditions requirement                        | LUMA/PREPA winds conditions requirement of 160 MPH has become an issue. Several vendors have responded that they will be unable to meet this requirement. Currently, products meet 140 MPH. ASCE allows the 140 MPH criteria on the location that the farm will be built. It was requested an exemption and LUMA responded that the requirement is only applicable to equipment that will handled or owned by PREPA or them. Furthermore, LUMA will not provide any technical inputs to any equipment or products that are not within the interconnection | Closed             | LUMA stated that this particular requirement is not applicable, and they will not provide any technical input of products used outside of the interconnection. GCB which meets 140 Mph has been approved. 140 MPH meets ASCE requirements |  |
|   | H. Transmission line design and Easement Usage/ Permit | It was requested the usage of a PREPA ROW or Easement near to the lands of the project to minimize the environmental impacts and shorten the path to the Hatillo POI substation via an RFI. LUMA responded  | Closed via RFI 015 | Preliminary Transmission line design defining the route has been released on 11/23/2022 to LUMA's department of   |  |

## LUMA Comments

| #        | Activity          | Description  | Status      | Comments   |  |
|----------|-------------------|--|-------------|--|--|
|          |                   | that it will be required to be address through their department of Land management and development instead. All documentation has been submitted to the LUMA's Land Department for certification, and endorsement. LUMA responded in a 2 <sup>nd</sup> letter that it will require more information of the transmission line design in order to approve the usage. Preliminary Transmission line design defining the route as per appendix b of the PPOA was released on 11/23/2022 and another letter to request the permit of usage of the easement was sent to LUMA Land Dept on the same date. |             | Land and permits. On 01/23/2023, LUMA responded via RFI 015 that the permit was approved with the condition of providing steel or concrete monopoles with the configuration of dual lines for future installations.. |  |
| <b>2</b> | <b>Commercial</b> |  |             |  |  |
|          | A. Certifications | filed with the Puerto Rico Energy Bureau for Xzerta Tec's Electric Service Company Certification as required under Rule 8701   | Completed   | Approved   |  |
|          | B. Loans          | Term Sheet was received  | In Progress | Modifications received. Discussions are undergoing awaiting new IRS rules regarding ITC's after latest amendments to The inflation reduction Act. As of December 15,   |  |

## LUMA Comments

| # | Activity           | Description   | Status    | Comments  |  |
|---|--------------------|---|-----------|---|--|
|   |                    |   |           | 2022 an evaluation on the percentage applicable to the project was being evaluated as location of the project and the use of made in USA equipment could increase the ITC's from 30% up to 50%. |  |
|   | C. Leases          | Executed the extensions on the leases of the properties that required such extensions. Xzerta continue to maintain land control over all the proposed parcels, plus some additional lots have been added and surveyed to guarantee the necessary space for the increased capacity.  | Completed |   |  |
|   | D. Mars CPA Report | Commissioned a report from our accounting firm Mars CPA regarding the possible incentives available to the project under the Puerto Rico Incentives Code, to review the prior decree granted to the project by the Department of Economic Development and to establish the final structure regarding the tax equity of the project. | Completed |   |  |

## LUMA Comments

| #        | Activity  | Description   | Status              | Comments   |  |
|----------|---|---|---------------------|--|--|
|          | E. LUMA request for payment for interconnection Study | LUMA transmitted a request for payment letter regarding of the study and evaluation of the project interconnection. Total amount to be paid as per LUMA letter is \$341k. As agreed with PREPA, Sargent & Lundy will perform the interconnection study. | Resolved Completed  | After latest Meeting with both PREPA and LUMA, PREPA has engaged Sargent and Lundy to conduct the study. During the month of December as stated on other sections above Xzerta interacted with S&L to provide additional information or revisions. |  |
| <b>3</b> | <b>Contracting</b>                                    |   |                     |  |  |
|          | A. Land Survey and Topographic Survey                 | Geomatic Solutions and Surveying, PSC   | Completed           |  |  |
|          | B. Plant Design                                       | CSA Architects and Engineers, LLP   | In progress         |  |  |
|          | C. Archaeological Study                               | Fernando Alvarado   | In progress         |  |  |
|          | D.Environmental Site Assessment Phase I-A Phase I-B   | Tycroes group   | Completed Delivered | Phase B received and under review  |  |
|          | E.Habitat Study                                       | Alejandro Cubiña  | Completed           |  |  |
|          | F. Foundation Design                                  | Carlos Rivera, P.E.   | Completed           |  |  |
|          | G. Anchoring  | RBI Solar, Solar Mounts and/or Schletter  | In progress         |  |  |
|          | H. Electrical Design                                  | Miguel Ortiz, P.E. Lisaidyn Perez Enerzinx  | Completed           |  |  |

## LUMA Comments

| # | Activity                    | Description    | Status    | Comments   |                                     |
|---|-----------------------------|----------------|-----------|--|-------------------------------------|
|   | I. SCADA Systems Design     | Lisaidyn Perez | Completed |  |                                     |
|   | J. Modeling and Simulations | Enerzinx       | Completed | Submitted on 07/2022 and a 2nd revision on 12/22/22. S&L confirmed on 01/24/2023 that the PSSE complies with the MTRs. S&L is reviewing the PSCAD files and completing the interconnection study and facility study as per Article 4.2. Results are pending LUMA/PREPA approval as per Article 4.2 and 9.4 for release to Xzerta for completion of final design. | <b>No pending action from LUMA.</b> |
|   | K. Relay Study              | Enerzinx       | Completed | Resubmitted to Luma incorporating comments on 10/28/2022. Under S&L review and pending completion of the interconnection study and facility study as per Article 4.2. Results are pending LUMA / PREPA approval as per Article 4.2 and 9.4   | <b>No pending action from LUMA.</b> |

# LUMA Comments

| # | Activity              | Description   | Status      | Comments  |  |
|---|-----------------------|---|-------------|---|--|
|   |                       |   |             | for release to Xzerta for completion of final design.             |  |
|   | L. Transmission Lines | Xzerta have contracted Eng. Ronald Hopgood as the local engineer of record in our team.   | Completed   |   |  |
| 3 | Construction          |   |             |   |  |
|   | A. Permits            | <p>Completed the following:</p> <ol style="list-style-type: none"> <li>1. Location</li> <li>2. Environmental</li> <li>3. Endorsements by <ul style="list-style-type: none"> <li>- Highway and Transportation Authority</li> <li>- Puerto Rico Energy Bureau</li> <li>- Cultural Institute</li> <li>- Puerto Rico Telecommunications Bureau</li> <li>- Puerto Rico Aqueduct and Sewer Authority</li> <li>- Department of Agriculture</li> </ul> </li> </ol> <p>Pending</p> <ol style="list-style-type: none"> <li>1. NWP-14</li> <li>2. NPDES General Permit</li> <li>3. Permits Management Office (OGPe) - Calculations for construction square footage were completed to finalize permit. Permit will be updated with the new data.</li> </ol> | In progress | Still waiting for LUMA/PREP A approval for usage of ROW/ Easement | <b>See item 1.H – Transmission Line design and Easement Usage Conditioned /Permit.</b> |

## LUMA Comments

| # | Activity            | Description  | Status                | Comments   |   |
|---|---------------------|--|-----------------------|--|---|
|   |                     | PREPA ROW / Easement Permit of usage   |                       |  |   |
|   | B. Land Acquisition |  | Completed             |  |   |
|   | C. Contractors      | No major changes, waiting for final drawings with Luma comments to be completed. Preliminary Scope of work was distributed to potential EPC, waiting for their updates of the quotes | In progress           | General Contractor (GC), subcontractors and consultants' agreements are in process.  |   |
| 4 | Procurement         |  |                       |  |   |
|   | A. Material List    | The material list has been generated but many long lead times products are waiting for proper approval.  | Waiting for approvals | Refer to Material List Annex 1 found below for further information. Under S&L review and pending completion of the interconnection study and facility study as per Article 4.2. Results are pending LUMA/PREPA approval as per Article 4.2 and 9.4 for release to Xzerta for completion of final design. There is no distinction between the materials that will be utilized for the facility vs | <b>LUMA's review of materials on the developer's facilities up to the high side of the step-up transformer are not required. It is the developer's responsibility to comply with the MTRs and applicable codes and regulations. The MTR compliance is an output of the interconnection studies. (No change from Nov. 2022 report)</b> |



## LUMA Comments

| # | Activity       | Description  | Status      | Comments  |   |
|---|----------------|--|-------------|---|---|
|   |                |  |             | the step-up transformer to point of connection does not exist in the contract. As per article 9.4, the design including the facility will required to be approved by PREPA and/or their representative. |   |
|   | B. Orders      | Waiting for LUMA's or PREPA's approval of proposed products. | In progress | Lead time of equipment could impact final implementation of project   | <b>LUMA's approval of the orders of materials on the developer's facilities up to the high side of the step-up transformer are not required. It is the developer's responsibility to comply with the MTRs and applicable codes and regulations. The MTR compliance is an output of the interconnection studies. (No change from Nov. 2022 report)</b> |
| 5 | Implementation |  |             |   |   |

## LUMA Comments

| # | Activity        | Description   | Status      | Comments   |                                     |
|---|-----------------|---|-------------|--|-------------------------------------|
|   | A. Installation | Preliminary definition of scope of works have been created and shared with proponents. Contractors (BLDM and Aireko) visited in December once again the premises in order to update their quotes, but final prices and contract are pending on the final approvals. | In progress | Waiting for S&L review of design documents and pending completion of the interconnection study and facility study as per Article 4.2. Results are pending LUMA/PREPA approval as per Article 4.2 and 9.4 for release to Xzerta for completion of final design. | <b>No pending action from LUMA.</b> |
|   | B. Testing      | Master Plan to be generated after approval of the design and upon receiving PREPA's approved testing protocols. Master plan and test procedures will be generated in accordance with PREPA/LUMA approved testing protocols and operations.                          | Not started | LUMA submitted their test protocols. The master plan will be based on this inf and the final approval of design.   |                                     |
|   |                 |   |             |  |                                     |

The following table shows the status of RFIs:

| # | Number  | Description  | Status | Date Submitted | Comments  | LUMA Comments                                    |
|---|---------|--|--------|----------------|---|--|
| 1 | RFI-001 | Transformer specs and interconnection requirements (Y-D, D-Y or D-D) | Closed | 4/26/2022      | 1 item remained open. Transformer should be YG to Delta on the side | <b>No open items. Refer to RFI 001 response.</b> |

## LUMA Comments

| # | Number  | Description  | Status | Date Submitted | Comments  | LUMA Comments  |
|---|---------|--|--------|----------------|---|--|
|   |         |  |        |                | of interconnection of 115 KV with PREPA with an internal shift of 30  |  |
| 2 | RFI-002 | Transformer specs (Not responded under RFI-001)  | Closed | 5/23/2022      | Specifications received. Issues with Wind Conditions requirement. It will be followed through RFI-006   | <b>Response to RFI was delivered by LUMA and wind conditions question clarified.</b>                                     |
| 3 | RFI-003 | SCADA Communication Protocol and Sample of Points  | Closed | 5/23/2022      | Received List. TBR  |  |
| 4 | RFI-004 | Amount of demand Energy of PR  | Closed | 5/23/2022      | Calculated at 0.0003% or 0.001 %  |  |
| 5 | RFI-005 | Request of Permit to usage of PREPAs ROW   | Closed | 5/23/2022      | RFI was closed but Item is still open. LUMA requested to submit request for usage of easement via another form since it is managed by their Dept. of Land and Permits   | <b>Item is not closed. Request for usage of existing easement was received and is under evaluation by the LUMA team.</b> |
| 6 | RFI-006 | Request for exemption to Wind Conditions requirements. Vendors unable to meet criteria of 160 MPH. Current design meets 120 to 140 MPH | Closed | 6/2/2022       | LUMA stated that the cited specification details the requirements for equipment to be owned, operated, and maintained by PREPA/LUMA. Knowing that this equipment will remain under the care, custody, and control of the proponent, LUMA will not provide technical input on alternate wind load criteria for transformer |  |

## LUMA Comments

| #  | Number  | Description   | Status | Date Submitted | Comments  | LUMA Comments   |
|----|---------|---|--------|----------------|---|---|
|    |         |   |        |                | components, since it is not an evaluation factor to determine the Facility's capability to be interconnected to the grid. Current design meets ASCE req. Refer to PPOA sections 9.4(a) and (b). |   |
| 7  | RFI-007 | Request for approval of GCB proposed product                          | Closed | 6/2/2022       | Hitachi GCB Breaker for 115 KV. It has been conditionally approved. LUMA requested to increase CC of GCB1 based on their current design, 145 KV @ 2000 A CC                                     | <b>Item is not closed. Item will be reviewed upon completion of the interconnection studies by S&amp;L.</b> |
| 8  | RFI-008 | Request for approval of MV Switchgear proposed product                | Closed | 6/30/2022      | LUMA stated that the MV switchgear approval is not within responsibilities. This will remain under contractor decisions regarding the solar farm or facility design.                            |   |
| 9  | RFI-009 | Request for approval of Protective Relays, Network Switch, Controller | Open   | 7/11/2022      | Equipment evaluations are pending completion of the Interconnection and Facility Studies performed by S&L.  |   |
| 10 | RFI-010 | Request for approval of Dynamic Studies                               | Open   | 7/11/2022      | Approval pending completion of the Interconnection and Facility Studies performed by S&L.   |   |

## LUMA Comments

| #  | Number  | Description  | Status | Date Submitted | Comments  | LUMA Comments |
|----|---------|--|--------|----------------|---|---------------|
| 11 | RFI-011 | Request for approval of 3P Main Step-Up Oil Transformer 34/115 KV  | Closed | 7/11/2022      | LUMA stated that is pending on interconnection study performed by S&L   |               |
| 12 | RFI-012 | Request for Testing Protocols and operating procedures   | Closed | 8/1/2022       | Delivered   |               |
| 13 | RFI-013 | Request for LUMA/ PREPA to confirm if the Seismic Design Category can remain in A instead D because there is no historical data that requires to consider inertial loads associated with earthquakes within the area | Closed | 10/13/2022     | LUMA will not evaluate the civil design aspects for the medium voltage switchgear, since this equip is located upstream from the Main Power Transformer, and thus lies beyond LUMA's evaluation responsibilities for privately-owned Renewables projects  |               |
| 14 | RFI-014 | Request PLS-CADD files for Transmission line detailed design   | Closed | 12/6/2022      | LUMA provided the requested information and files   |               |
| 15 | RFI-015 | Response to Letter for Request of Permit to usage of PREPAs ROW  | Closed | 1/24/2023      | Xzerta submitted to LUMA's Lands & Permits team on Nov 23, 2022, a 2nd request for the usage of existing easement/right-of-way that was reserved for future work on previously existing 115kV transmission line 39100 spanning westbound from Hatillo TC to Mora TC, in Isabela. It has been approved with the condition of been prepared for dual lines. |               |

## LUMA Comments

The following table shows the status of Transmittals:

| # | Number       | Description  | Status | Date Submitted | Comments   | LUMA Comments |
|---|--------------|--|--------|----------------|--|---------------|
| 1 | XTA-TRA-0001 | Relay Study and Updated Preliminary design                                       | Open   | 9/21/2022      | LUMA stated that is pending on interconnecti on study performed by S&L |               |
| 2 | XTA-TRA-0002 | Energy Yield Assessment  | Open   | 9/30/2022      | LUMA stated that is pending on interconnecti on study performed by S&L |               |
| 3 | XTA-TRA-0003 | Relay Study and Updated Preliminary design based on LUMA's Comments of 10/3/2022 | Open   | 10/28/2022     | LUMA stated that is pending on interconnecti on study performed by S&L |               |
| 4 | XTA-TRA-0004 | Xzerta Ltr 2nd Request of Permit Use of ROW and Rev 14 SLD Preliminary Design    | Open   | 11/23/2022     | Received and under evaluation by the LUMA team                         |               |