

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

NEPR
Received:
Mar 28, 2023
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IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Motion in Compliance with
Resolution and Order of March 23, 2023**

**MOTION IN COMPLIANCE WITH
RESOLUTION AND ORDER OF MARCH 23, 2023**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy Servco, LLC** (“ServCo”), (jointly referred to as the “Operator” or “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On March 15, 2023, LUMA filed before the Energy Bureau a *Submission of Reconciliations for December 2022 and, January and February 2023, and FCA, PPCA and FOS Calculated Factors and Request for Confidential Treatment* (“March 15th Submission”). LUMA submitted the quarterly reconciliations for the Fuel Charge Adjustment (“FCA”) and Purchased Power Charge Adjustment (“PPCA”) riders for September 2022 through February 2023, and the factors for the FCA, PPCA, and Fuel Oil Subsidy (“FOS”) riders for the period from April 1 until June 30, 2023. As part of the filing, LUMA included Excel spreadsheets filed publicly and confidential Excel spreadsheets with formulae intact.

2. On March 23, 2023, the Energy Bureau issued a Resolution and Order (“March 23 Order”) instructing the Puerto Rico Electric Power Authority (“PREPA”), through LUMA, to submit on or before March 28, 2023, at 3 p.m., a report of the status of the claims made to the Federal Emergency Management Agency (“FEMA”) and/or insurance companies due to the

damages sustained as a consequence of Hurricane Fiona. The report shall include whether there has been any disbursement to PREPA associated with such claim(s) that can be credited in favor of the consumer. Further, the Energy Bureau ordered PREPA, through LUMA, to present the necessary information to validate the amount of \$5,977,764.63 for alleged excess natural gas nominations and the corresponding credits to July and August 2022.

3. In compliance with the March 23 Order, LUMA hereby submits, on behalf of PREPA, a report of the status of the claims made to FEMA and/or insurance companies due to the damages sustained as a consequence of Hurricane Fiona. *See Exhibits A and A-1.* LUMA also submits, on behalf of PREPA, information to validate the amount of \$5,977,764.63 for alleged excess natural gas nominations and the corresponding credits to July and August 2022. *See Exhibit B.* The information submitted was provided by PREPA and is filed herein pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution Operation and Maintenance Agreement.

4. LUMA, on behalf of PREPA, is submitting herein a redacted public version of **Exhibit A-1** protecting confidential information associated with Critical Energy Infrastructure Information (“CEII”). The information therein is protected from disclosure as CEII, *see e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. §388.113 (2020), and pursuant to the Bureau’s Policy on Management of Confidential Information. *See Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.*

5. Under separate cover and expediently, within the next ten days, as allowed by Section A.2 of the Energy Bureau’s Policy on Management of Confidential Information, LUMA will submit a memorandum of law in support of this request to file the unredacted version of Exhibit A-1 under seal of confidentiality.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept and receive** the information submitted on behalf of PREPA in Exhibits A and B to the Motion; **treat confidentially** the information submitted on behalf of PREPA in Exhibit A-1 to the Motion; and **deem** LUMA complied with the Resolution and Order of March 23, 2023.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 28th day of March 2023.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to counsel for PREPA Joannely Marrero, jmarrero@diazvaz.law, and to the Independent Consumer Protection Office, through Director Hannia Rivera, hrivera@oipc.pr.com.



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Exhibit A

Anejo A



Reclamación a FEMA

El Negociado ordena a la Autoridad a informar el estatus de la reclamación realizada a la Agencia Federal para el Manejo de Emergencias (“FEMA”, por sus siglas en ingles) y a las aseguradoras como consecuencia de los daños causados por el Huracán Fiona al sistema eléctrico.

Respuesta: En base a lo anteriormente informado a este Honorable Negociado como parte de la Moción en Cumplimiento de Orden del 22 de diciembre de 2022, la Autoridad, como sub-recipiente, ha continuado los esfuerzos y los trabajos en conjunto con la FEMA y la Oficina Central de Recuperación, Reconstrucción y Resiliencia (COR3) para así actualizar la reclamación y la aprobación de los daños causados por el huracán Fiona.

En respuesta a la reclamación iniciada por la Autoridad, el 5 de enero de 2023, FEMA obligó la cantidad de \$68,518,319.00 neta de deducciones de seguros anticipadas por la cantidad de \$29,691,271.00, sin embargo, cabe destacar que este dinero aún no ha sido desembolsado por FEMA. Se incluye el PRJ Report 686388. Ver Anejo A-1.

Es importante reiterar que lo sometido a FEMA y su subsiguiente obligación se trabajó a base de estimados. Las deducciones de seguros se incluyeron en el proceso de formulación considerando que aún no se había certificado si el reclamo de gastos extra (“*extra expense*”) se materializaría. Luego del análisis realizado por la Autoridad sobre la utilización de las maquinas pico por causa del huracán fue menor a treinta (30) días, se determinó que, bajo los términos de elegibilidad de la póliza de seguros de la Autoridad, en relación a los daños ocasionados por el Huracán Fiona no existe un *extra expense* que se le pueda reclamar a las aseguradoras.

Por lo tanto, una vez que se recibió el costo real y se obtuvieron los gastos relacionados con el huracán certificados por la gerencia de la Autoridad, el 7 de marzo de 2023, la autoridad presentó ante COR3 su solicitud de reembolso (“RFR”, por sus siglas en inglés) por un monto de \$62,743,771.00 que representa los costos reales incurridos desde el 17 de septiembre de 2023 hasta el 11 de octubre de 2023, fecha en que los funcionarios de la Autoridad certificaron que el uso del equipo fue relacionado con el evento del huracán Fiona.

Además, el 27 de marzo de 2023, la Autoridad solicitó a COR3 que no considere las deducciones del seguro dado a que los ingresos anticipados del seguro incluidos en el proyecto no se materializarán y se considerarán no calificados. Los procesos de reembolso están actualmente ante la consideración de COR3 y la Autoridad no ha recibido desembolso de partida alguna relacionada con la reclamación de los daños causados por el huracán Fiona.

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 y estos se encuentran en las cuentas bancarias de la Autoridad ya que esta atraviesa un proceso de quiebra y ha experimentado un flujo de liquidez capital precario.



Anejo A-1



Department of Homeland Security Federal Emergency Management Agency

General Info

Project #	686388	PW #	44	Project Type	Standard
Project Category	B - Emergency Protective Measures			Applicant	PR Electric Power Authority (000-UA2QU-00)
Project Title	Peaking Units - Fiona				
Project Size	Large				
Activity Completion Date	3/21/2023			Event	4671DR-PR (4671DR)
Process Step	Obligated			Declaration Date	9/21/2022
				Incident Start Date	9/17/2022
				Incident End Date	9/21/2022

Damage Description and Dimensions

The Disaster # 4671DR, which occurred between 09/17/2022 and 09/21/2022, caused:

Damage # 1253019; Emergency Protective Measures (Damage for Project [686388] Peaking Units - Fiona)

During the incident period of 9/17/2022 through 9/21/2022, Hurricane Fiona created an immediate threat to the health and safety of the general public requiring emergency response and protective measures.

- Provided Emergency Protective Measures for electrical power (Peaking Units) to power the Puerto Rico electrical system in the power plants at Aguirre, Cambalache, Mayaguez, Daguao, Vega Baja, Yabucoa, Palo Seco, and Jobos from 9/17/2022 to 10/31/2022.

Final Scope

1253019 Damage for Project [686388] Peaking Units - Fiona

Work Completed

The applicant utilized force account equipment for the Emergency Protective Measures caused by damages received by the incident.

Cost share for this version is 100%. All work and costs in this project fall between 9/17/2022 and 9/30/2022.

- A. Provided Electric Power for Power System of Puerto Rico at Aguirre Power Plant.
- B. Provided Electric Power for Power System of Puerto Rico at Cambalache Power Plant.
- C. Provided Electric Power for Power System of Puerto Rico at Mayaguez Power Plant.
- D. Provided Electric Power for Power System of Puerto Rico at Daguao Power Plant.
- E. Provided Electric Power for Power System of Puerto Rico at Vega Baja Power Plant.

- F. Provided Electric Power for Power System of Puerto Rico at Yabucoa Power Plant.
- G. Provided Electric Power for Power System of Puerto Rico at Palo Seco and Palo Seco MP Power Plant.
- H. Provided Electric Power for Power System of Puerto Rico at Jobos Power Plant.

Work Completed Totals:

- A. Equipment \$9,603,018.00
- B. Equipment \$6,552,835.00
- C. Equipment \$5,255,993.00
- D. Equipment \$1,071,539.00
- E. Equipment \$0.00
- F. Equipment \$207,527.00
- G. Equipment \$6,420,839.00
- H. Equipment \$579,521.00

Work Completed Total: \$29,691,271.00

Work To Be Completed

The applicant will utilize force account labor, equipment, materials, and contracts or mutual aid for the Emergency Protective Measures caused by damages received by the incident.

Cost share for this version is 100%. All work and costs in this project fall between 10/01/2022 and 10/31/2022.

- A. Provide Electric Power for Power System of Puerto Rico at Aguirre Power Plant.
- B. Provide Electric Power for Power System of Puerto Rico at Cambalache Power Plant.
- C. Provide Electric Power for Power System of Puerto Rico at Mayaguez Power Plant.
- D. Provide Electric Power for Power System of Puerto Rico at Daguao Power Plant.
- E. Provide Electric Power for Power System of Puerto Rico at Vega Baja Power Plant.
- F. Provide Electric Power for Power System of Puerto Rico at Yabucoa Power Plant.
- G. Provide Electric Power for Power System of Puerto Rico at Palo Seco and Palo Seco MP Power Plant.
- H. Provide Electric Power for Power System of Puerto Rico at Jobos Power Plant.

Work to be Completed Totals:

- A. Equipment \$22,160,810.76
- B. Equipment \$15,121,926.32
- C. Equipment \$12,129,213.71
- D. Equipment \$2,472,781.22
- E. Equipment \$0.00
- F. Equipment \$478,909.59

G. Equipment \$14,817,321.37

H. Equipment \$1,337,355.75

I. Equipment \$1,337,355.75

Work to Be Completed Total: \$68,518,319.00

Total Damage Inventory: 98,209,590.00

Project Notes:

1. All costs associated with this project have been validated using applicant provided historical data. See attachment labeled: ST686388-DR4671PR-Cost Summary.xls

2. GPS coordinates for Locations Aguirre, GPS: [REDACTED]; Cambalache, GPS: [REDACTED]; Mayaguez, GPS: [REDACTED]; Daguao, GPS: [REDACTED]; Vega Baja, GPS: [REDACTED]; Yabucoa, GPS: [REDACTED]; Palo Seco, GPS: [REDACTED]; Jobos, GPS: [REDACTED]

3. Cost adjusted from SPA due to mathematical error in totals provided by the applicant, see document: 686388-DR4671PR-Force Account Equipment.xls

Cost

Code	Quantity	Unit	Total Cost	Section
9008 (Equipment)	1.00	Lump Sum	\$29,691,271.00	Completed
9008 (Equipment)	1.00	Lump Sum	\$68,518,319.00	Uncompleted

CRC Gross Cost	\$98,209,590.00
Total Insurance Reductions	(\$29,691,271.00)
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CRC Net Cost	\$68,518,319.00
Federal Share (100.00%)	\$68,518,319.00
Non-Federal Share (0.00%)	\$0.00

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-4671-PW-00044(56)	\$68,518,319.00	100 %	\$68,518,319.00	1/5/2023

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

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

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all 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 subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project 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 subrecipient'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, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) 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 under the Public Assistance award 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 Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project 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 Title 2 Code of Federal Regulations (C.F.R.) Part 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. Part 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 subrecipient 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 subrecipient 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 all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an 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

12/6/2022

GENERAL INFORMATION

Event: 4671DR-PR

Project: ST 686388

Category of Work: Cat B - Emergency Protective Measures

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Fiona

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2022 to 9/21/2022

Total Public Assistance Amount: CRC Gross Cost \$98,209,590.00

COMMERCIAL INSURANCE INFORMATION

Does the Applicant have a Commercial Policy: Yes

Policy Issued by: Mapfre-Praico Insurance Company and other Insurance Companies

Policy Number: RA-21-336-1

Policy Period: From: 5/1/2022 To: 5/1/2023

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.

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.

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

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

The amount of the deductible being funded in this project is \$68,518,319.00

The amount of Anticipated Insurance Reduction applied for Project: \$29,691,271.00

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

Damaged Inventory (DI) #1253019:

Emergency Protective Measures (Damage for Project [686388] Peaking Units - Fiona)

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

Locations Description: Peaking Generators in Aguirre Power Plant, Cambalache Power Plant, Mayaguez Power Plant, Daguao 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. 17.949117 Long -66.231594

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

Lat. [REDACTED]

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

Lat. [REDACTED]

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

Lat. [REDACTED]

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

Lat. [REDACTED]

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

Lat. [REDACTED]

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

Lat. [REDACTED]

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

Lat. [REDACTED]

Cause of Loss: Wind / Wind Driven Rain

Damage Inventory Amount: CRC Gross Cost \$98,209,590.00

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Prior Obtain and Maintain Requirement:

Prior O&M compliance does not apply to emergency work funding (Section 403)

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Reduction(s):

A reduction is being made for anticipated insurance proceeds in the amount of \$29,691,271.00 (CRC Gross Cost \$98,209,590.00 – Extra Expense Calculated Deductible \$68,518,319.00). Please see, "77033-DR4671PR-Insurance Allocation" file.

On December 6, 2022, COR3 transmitted the PREPA letter dated December 2, 2022 confirming that PREPA holds an insurance policy with a limit of \$300 Million to cover damages caused by Hurricane Fiona, FEMA-4671-DR-PR. PREPA letter stated that preliminary extra expenses costs incurred until October 2022 for the use of peaking units are estimated to be \$98,209,590.00. However, the time element deductible associated with the extra expense coverage has a 30-day waiting period. As per the applicant's letter the cost incurred during the 30-day deductible amounts to a total of \$68,518,319.00.

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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 their 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 limits. 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 it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled 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 it is 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 their insurer(s).

Jean-Carlo Echevarria, PA Insurance Specialist

CRC Atlantic, Guaynabo, PR

O&M Requirements

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

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders?

Yes

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.

EHP Additional Info

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

Final Reviews

Final Review

Reviewed By JIMENEZ VELEZ, ALEJANDRO R.

Reviewed On 12/09/2022 3:51 PM AST

Review Comments

No comments available for the Final Review step

Recipient Review

Reviewed By Salgado, Gabriel

Reviewed On 12/09/2022 5:27 PM AST

Review Comments

Recipient review completed. Project is ready for applicant review.

Project Signatures

Signed By Nieves, Ezequiel

Signed On 12/09/2022

Exhibit B

Anejo B



Nominación de Gas Natural en Exceso

El Negociado de Energía ordena a la Autoridad a ponerlo en posición de validar la procedencia de la partida de \$5,977,764.63 por nominaciones de gas natural en exceso y los créditos correspondientes a los meses de julio y agosto de 2022.

Respuesta: En la moción en cumplimiento con la Orden del 29 de septiembre de 2022, la Autoridad proveyó a este Honorable Negociado un informe detallado de las cláusulas contractuales y los retos operacionales que dieron lugar a las nominaciones de gas natural en exceso y los créditos correspondientes a los meses de julio y agosto de 2022.

La Autoridad adopta por referencia lo allí descrito y reitera que las nominaciones de la Autoridad se realizan a base de proyecciones y desafortunadamente están siempre expuestas a un margen de error, lo cual se agudiza ante el mal estado de las unidades de generación que causa cambios constantes al plan de mantenimiento y conservación de la Autoridad. Además, la Autoridad no está encargada del despacho de las unidades, lo cual también puede incidir en el uso de las unidades y por consecuencia el consumo de combustible.

Para fácil referencia del Honorable Negociado incluimos la explicación de la causa de las nominaciones en exceso correspondientes de junio y julio de 2022 que dieron lugar a los créditos en las facturas de julio y agosto de 2022.

Junio 2022

- Para el mes de Junio 2022 la Autoridad nominó el 5 de mayo la cantidad inicial de gas natural solicitada de 567,000MMBtu. El 3 de junio debido a las situaciones operacionales del sistema y para no afectar las reservas se determinó diferir el mantenimiento programado de la unidad 6 de San Juan en junio y mantenerla en servicio. Por lo cual, la Autoridad requirió de NFE la cantidad adicional de gas natural de 662,336MMBtu.
- En conjunto, para el mes de junio de 2022 la Autoridad solicitó a NFE que le vendiera un total de 1,229,336MMBtu. En este caso el despacho de las unidades causó que no se consumiera el total de gas natural solicitado para el mes de junio de 2022 y hubo un exceso de gas de 35,206.05 MMbtu.
- El 1 de agosto de 2022, NFE envió a la Autoridad la factura correspondiente a la compraventa de gas natural del mes de julio de 2022. En esta factura NFE acreditó a la Autoridad \$813,963.88 correspondiente a venta de mitigación de 35,206.05 MMbtu, que es el 15% de la cantidad de gas no consumido por la Autoridad durante el mes de junio de 2022.

Julio 2022

- El 5 de junio de 2022, la Autoridad envió a NFE la nominación correspondiente a Julio. En la misma se solicitó una venta de 1,956,000MMBtu.



- La factura del el mes de agosto NFE acreditó a la Autoridad \$504,922.89 correspondiente a venta de mitigación de 31,491.45 MMbtu, que es el 15% de la cantidad de gas no consumido por la Autoridad durante el mes de julio de 2022.
- La Autoridad entiende que hubo razones operacionales y contractuales que aún se evalúan para el consumo de menos de lo nominado en julio 2022. La Autoridad se compromete con el Negociado de Energía de informar de manera puntual la situación de hechos que dio lugar al crédito en julio 2022 tan pronto el análisis por el Directorado de Generación sea completado.

