

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

IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

CASE NO.: NEPR-MI-2021-0004

SUBJECT: Determination in Response to PREPA's April 25 Motion in Response to PREB's April 18 Order regarding PREPA's request to Amend PREPA FY2023 Budget.

RESOLUTION AND ORDER

I. Relevant Procedural Background

On March 14, 2023¹, the Puerto Rico Electric Power Authority ("PREPA") filed before the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") a petition to amend the FY23 PREPA's Budget (which was conditionally approved through a Resolution and Order dated February 27, 2023).² Promptly thereafter, the Energy Bureau began the evaluation of the Petition through a procedure that entailed, (i) a conference with PREPA's key representatives, (ii) issuance of various requests for information (iii) review of modifications to the Petition filed by PREPA³ and (iv) review of supplemental information and explanations filed by PREPA.⁴

On the April 18 Resolution the Energy Bureau partially and conditionally approved PREPA's Petition, as follows:

1. *Generation NME and Operational expenditures for FY2023 for \$13,920,000 to be allocated for the operation and maintenance budget and \$3,734,000 for the NME Budget for the Budgetary line items and projects as outlined in Annex A.*
2. *General PR Mobilization Funding of up to \$15 million to pay for General PR Mobilization costs as required under the LGA-OMA.*
3. *VTP Funding of up to \$29.4 million to fund a VTP program consistent with PREPA's obligations under Act 120-2018, as amended by Act 17-2019.*
4. *Pension Funding needs of up to \$65 million and only for the needs of the current FY2023 (i.e., May and June).*

The Energy Bureau also ordered PREPA to use unincumbered funds at its disposal -subject to the limitations imposed through the FOMB March 24 Resolution⁵- as the source of funding for the conditionally approved FY2023 Budget increase. In addition, the Energy Bureau ordered PREPA to provide additional documents and explanations to further

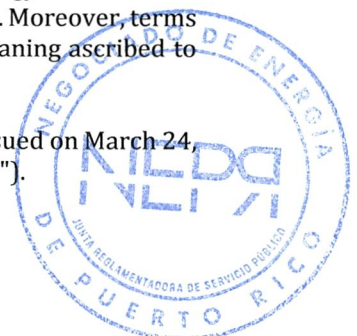
¹ In re: Review of LUMA's Initial Budget, Case No.: NEPR-MI-2021-0004, Request to Amend FY2023 PREPA Budget for Implementation of FOMB Certified Fiscal Plan Transformation Initiatives, filed by PREPA on March 14, 2023 ("Petition").

² Resolution and Order, In re: Review of LUMA's Initial Budgets, Case No.: NEPR-MI-2021-0004, February 27, 2023 ("FY23 Budgets Determination Order").

³ Petition for purposes of this Resolution and Order consists in the original petition filed by PREPA on March 14, 2023, as modified by PREPA's subsequent filings.

⁴ A detailed procedural background is included in the Resolution and Order issued by the Energy Bureau in the instant case on April 18, 2023, ("April 18 Resolution") and is incorporated herein by reference. Moreover, terms and/or abbreviations not otherwise defined in this Resolution and Order shall have the meaning ascribed to them in the April 18 Resolution.

⁵ Resolution Certifying Fiscal Year 2023 Budget for the Puerto Rico Electric Power Authority, issued on March 24, 2023 by the Financial Oversight Management Board ("FOMB"), ("FOMB March 24 Resolution").



evaluate operation and maintenance and Necessary Maintenance Expenses ("NME") amounts not approved through the April 18 Resolution.⁶

On April 25, 2023, PREPA filed with the Energy Bureau, a document titled "*Informative Motion in Response to PREB's Directives and Requests for Information in Compliance with the April 18 Order*" ("April 25 Motion") in which PREPA:

1. *Requests clarification from the Energy Bureau on its direction "to plan as an additional source of unencumbered funds the Collection Past Due Bills amounts after LUMA is able to identify potential offsets to the budgeted bad debt expenses." Does the Energy Bureau direction suggest that if the actual Bad Debt for FY2023 is lower by \$5 million than the certified budget Bad Debt of \$74.5 million, the \$5 million positive variance may be considered as an additional source of unencumbered funds to cover approved FY2023 budget expenses?*
2. *Provided supplementary information to further evaluate the appropriateness of the budgetary increase not approved to date. Particularly, the Energy Bureau directed PREPA to respond to the Request for Information as stated in Annex A of the April 18 Order. PREPA provided responses to Annex A of the April 18 Order.*

II. Discussion and Analysis

A. Determination on supplementary information to further evaluate the appropriateness of the budgetary increase not approved to date.

1. *Additional Operation and Maintenance Expenses*

The Energy Bureau evaluated PREPA's April 25 Motion and the accompanying information. With respect to the Operation and Maintenance Budget, no additional funds can be approved based on the vague and generic explanations as well as the conflicting supporting information provided by PREPA.

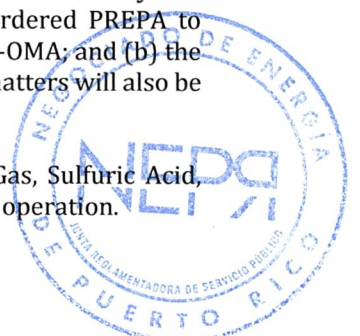
The Energy Bureau underlines that PREPA's spending pattern during the first half of FY2023 evidences a lack of planning and discipline to adhere to the approved FY2023 Budgets. The Energy Bureau perceives no extraordinary situation which would entitle PREPA to spend most of the approved Operating and Maintenance budget in only eight (8) months. It is unexpected that in its budget request for FY2023 PREPA did not consider its needs for the entire period of twelve (12) months.⁷ In addition, if the full budget requested amount was not approved due to competing resource allocation decisions or any other policy decision, PREPA's leadership, with its employees, should have adjusted efforts to conform to the resources available as approved in the FY2023.

PREPA failed to show how the additional funds requested would enable it to improve the condition of the system in the near term. PREPA did not explain the convenience of incurring the proposed maintenance expenses during FY2023 instead of during the period of operation of the temporary generation units proposed under the updated Generation Stabilization Plan.

Under PREPA's prevailing critical financial condition, the Energy Bureau cannot allow PREPA to spend money it cannot spend efficiently. The Energy Bureau emphasizes that PREPA's spending must be responsible. PREPA should leave funds unspent in its

⁶ An order to show cause was included in the April 18 Resolution which will be addressed by the Energy Bureau through another resolution and order. In addition, the Energy Bureau ordered PREPA to provide: (a) the latest estimate of the funding needs for the Service Accounts as per the LGA-OMA; and (b) the amount of underfunding of the LUMA Service Accounts to date as per the T&D-OMA. These matters will also be addressed in another resolution and order.

⁷ Note for example important raw materials used in PREPA's processes (e.g., Hydrogen Gas, Sulfuric Acid, Caustic Soda, and Ammonia) were allegedly exhausted in approximately eight (8) months of operation.



operational accounts rather than spend them inefficiently.

The Energy Bureau **DETERMINES** that any further request for Operation and Maintenance funds shall be made, (i) as part of the FY2024 Budget Process, (ii) consistent with the updated Generation Stabilization Plan, and (iii) following the Procedural Calendar determined in the Energy Bureau Resolution dated May 8, 2023 regarding the "*Modification of Procedural Calendar*".

2. Additional Generation Expenditures

In connection with the additional NME request, the Energy Bureau **APPROVES** additional funds for those units outlined to stay in operation for an extended period pursuant to PREPA's Approved IRP,⁸ for which there is already an approved FEMA Project, and for which justification could be verified with the information provided by PREPA.

As for the Peaking Units, the requested funds cannot be justified for investment in equipment that will be rendered "not necessary" in about two (2) years. Pursuant to the retirement plans expected in the Approved IRP, the execution of the investment is comparably the same time to install the new seven (7) peaking units and the four (4) black start units.

The Energy Bureau **DETERMINES** that any further request for NME funds shall be made, (i) as part of the FY2024 Budget Process, (ii) considering the then unencumbered funds in the FEMA Reimbursement Account, and (iii) following the Procedural Calendar determined in the Energy Bureau Resolution and Order dated May 8, 2023, regarding the "*Modification of Procedural Calendar*."

B. Collection Past Due Bills amounts after LUMA can identify potential offsets to the budgeted Bad Debt expenses.

The FY2022 Budgets and the FY2023 Budgets included line-item provision for uncollectable receivables (Bad Debts), which are incorporated into the approved budgets. The Energy Bureau also recognizes that in past years, PREPA's budgets also included line-item provisions for uncollectable receivables. If the actual Bad Debt expense for uncollected accounts corresponding to FY2023, or any prior year, is lowered (credited) due to the actual collection from past due bills, such positive variance may be an additional source of unencumbered funds. Once assessed, those additional unencumbered funds may cover proposed budget increases, subject to the Energy Bureau's prior approval. Therefore, to the extent that LUMA recognizes a positive variance attributable to the Bad Debts reduction, such additional source of unencumbered funds may be used by PREPA to fund the increase to the FY2023 Budgets approved through the April 18 Resolution and this Resolution and Order.

III. Conclusion

The Energy Bureau, (i) **DENIES** PREPA's request to further increase the Operation and Maintenance Budget and (ii) **APPROVES** an additional increase of **\$2,650,000** for the NME Budget for the budgetary line items and projects as outlined in Annex A.

The total amendment to the FY2023 Budgets approved through the April 18 Resolution and this Resolution and Order, subject to the sources of funding specified in the FOMB March 24 Resolution, is summarized below:

1. *Generation NME expenditures - \$6,384,000.*
2. *Maintenance and Operational expenditures - \$13,920,000.*

⁸ See in general Final Resolution and Order on the Puerto Rico Electric Power Authority's Integrated Resource Plan, *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001, August 24, 2020 ("Approved IRP").



3. *Genera PR Mobilization Funding of up to \$15 million to pay for Genera PR Mobilization costs as required under the LGA-OMA.*
4. *VTP Funding of up to \$29.4 million to fund a VTP program consistent with PREPA's obligations under Act 120-2018, as amended by Act 17-2019.*
5. *Pension Funding needs of up to \$65 million and only for the needs of the current FY2023 (i.e., May and June).*

The Energy Bureau **WARNS** PREPA that: (i) noncompliance with this Resolution and Order, regulations and/or applicable laws may carry the imposition of fines and administrative sanctions of up to \$25,000 per day; (ii) any person who intentionally violates Act 57-2014,⁹ as amended, by omitting, disregarding, or refusing to obey, observe, and comply with any rule or decision of the Energy Bureau shall be punished by a fine of not less than five hundred dollars (\$500) nor over five thousand dollars (\$5,000) at the discretion of the Energy Bureau; and (iii) for any recurrence of non-compliance or violation, the established penalty shall increase to a fine of not less than ten thousand dollars (\$10,000) nor greater than twenty thousand dollars (\$20,000), at the discretion of the Energy Bureau.


Be it notified and published.

 _____ Edison Avilés Deliz Chairman	 _____ Lillian Mateo Santos Associate Commissioner	 _____ Ferdinand A. Ramos Soegaard Associate Commissioner
 _____ Sylvia B. Ugarte Araujo Associate Commissioner	 _____ Antonio Torres Miranda Associate Commissioner	

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on May 9, 2023. I also certify that on May 9, 2023, a copy of this Resolution and Order was notified by electronic mail to the following: jaime.elkoury@promesa.gov; margarita.mercado@us.dlapiper.com; ana.rodriguezrivera@us.dlapiper.com; mvazquez@diazvaz.law; jmarrero@diazvaz.law; brannen@genera-services.com; kbolanos@genera-pr.com; regulatory@genera-pr.com; and I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau.

For the record, I sign this in San Juan, Puerto Rico, on May 9, 2023.



Sonia Seda Gaztambide
Clerk



⁹ Puerto Rico Energy Transformation and RELIEF Act, as amended ("Act 57-2014").

Annex A



Incremental NME				Exhibit E - Second Review				PREB Determination					
Item	Unit	Description	Justification	Project Cost	Additional Need	FY2022-23	FY2023-24	Approval FY23	Amount \$M	PREB Request of Information	Answers from PREPA	PREB Determination	Amount \$M
1	All Units	Forced Outage - Blanket	Due to the lack of maintenance and delayed maintenance (bankruptcy, hurricanes and remote events) of most of the generation fleet the percentage of forced departures has increased in the last 8 years from 8 percent to 20 percent. The costs of these departures have also been increased by the worldwide situation of availability of spare parts.		\$ 8,000,000.00	\$ 8,000,000.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: It seems more related to M&O than to NME.	PREPA's financial procedures, and based on knowledge and experience, the proposed contingency fund would be used in case of forced outages, or it will be returned.	Not Approved.	
2	All Units	cost of living increase - Blanket	Incremental costs of inflation and others. accidental damage to transportation and delivery infrastructure		\$ 2,000,000.00	\$ 2,000,000.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide any valid data to justify the request.	Similar to previous answer for Item no.1; based on knowledge and experience of PREPA's employees, global market affected by COVID pandemic & war at Ukraine; the proposed contingency blanket will be used to cover expenses caused by unforeseen high cost due to inflation, or it will be returned.	Not Approved.	
3	Palo Seco 3	Auxiliary Equipment	These funds are needed to meet the need for replacement of engines, pumps, induced fans, forced fans, bearings, seals and valves among others.		\$ 2,210,000.00	\$ 1,500,000.00	\$ 710,000.00	Not Approved with the info submitted (see comments)	\$ -	Many Projects approved by FEMA associated to this Unit. (See Project # 662957) There are activities associated with these Auxiliary Equipment. Please explain if the 10% share not covered by FEMA is considered in this request?	The funds are intended for conducting the required environmental works, not included in the referenced PW. The SOW submitted to FEMA do not consist on a total Overhaul of the unit, as they only are intended to repair major components. Unit must be repaired immediately or partially repaired with \$700k. PREPA awaiting EPAs response of two extensions for conducting these works.	\$700,000 - for necessary "partial" repair.	\$ 0.70
4	San Juan 7	Boiler Pressure Parts - Environmental	It is necessary to replace the frontal water wall of the boiler since it is damaged due to overheating. The unit is actually under and environmental outage and it cant return to service without these replacements. Thus, 100mw will be lost in the load peak season. In the other hand it is necessary to replace several other pressure parts in the boiler and the procurement process should start in this fiscal year to avoid delay in the materials since, as it is happening in the whole industry, the material acquisition lead time is extensive (6 to 12 months).		\$ 2,600,000.00	\$ 450,000.00	\$ 2,150,000.00	Approved	\$ 0.45	What is described is considered a NME as it is a repair of a failure caused by usage. Not detected previously.	Approved		
5	Costa Sur 6	Environmental	The unit shall be retired from service on April 7, 2023 (after the return of Ecoelectrica) to perform an environmental outage. Actually the unit experience combustion problems and opacity issues since the a high fouling condition of the furnace. The environmental outage can not be delayed and the unit shall be retired from service anyway. This unit represent 410 MW of a base load unit that wont be available for the peak load season if the environmental task are not performed.		\$ 1,500,000.00	\$ 1,500,000.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: It seems more to M&O: cleaning of boiler furnace.	The funds are intended for conducting the required environmental works, "cleaning of the boiler furnace" is just one, other works require parts and components that are classified as NME expenses following PREPA's financial procedures. Conditioned to PREB's approval of the budget, environmental work can be completed by end of May, on time for hurricane season.	Not Approved. Overhaul on the Unit - not justified.	
6	Costa Sur 5	Environmental and programed outage	The unit shall be retired from service on May 1, 2023 (after the return of Costa Sur 6) to perform both an environmental and programmed outage. As it happened in Costa Sur 6, the furnace is highly fouled and the Air preheater baskets shall be replaced since they are highly corroded. in the other hand, the turbine shall be replaced since the actual one is running with high vibrations since a turbine water induction event. There repairs wall finish by August 2023 just in the beginning of the peak load and hurricane season. This unit represent a load of 410 MW and actually is limited to only 210 MW.		\$ 1,500,000.00	\$ 1,500,000.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: It seems more to M&O: cleaning of boiler furnace. Also, FEMA Approved Project # 672950 includes the replacement of the turbine rotor and many other works. FEMA approval of \$8.45M for Unit 5 Turbine Rotor.	The funds are intended for conducting the required environmental works, "cleaning of the boiler furnace" is just one, other works require parts and components that are classified as NME expenses following PREPA's financial procedures. The unit's repairs SOWs submitted to FEMA do not consist in a total Overhaul. The PW approved is different to this NME works. Conditioned to PREB's approval of the budget, environmental work can be completed by end of June, on time for hurricane season.	Approved - An "overhaul" would place this unit in an operational condition that combined with FEMA approved funds for Turbine rotor will improve to its 400MW capacity.	\$ 1.50
7	Costa Sur 1-1	Bearing 2 Improvement	This unit is the Blackstart of Costa Sur Power Plant		\$ 1,500,000.00	\$ 450,000.00	\$ 1,050,000.00	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: There is an approved SOW by PREB (SOW #37) totaling \$45.20M related to this unit.	Repair several peaking units to support the operation while the eleven peaking and black-start units are installed (approximately 24 months). This unit is the black-start of Cost Sur 1.1.	Approved. Black-start of unit CS 1.1	\$ 0.45
8	Aguirre	Boiler Improvement U-2 - Aguirre Steam Plant	The unit, which is actually limited to 350 MW (from 450MW) require the replacement of the boiler burners air and combustion assemblies since high deterioration was found in the last outage and the replacement parts were not available. Thus, to avoid a force outage of this unit, the procurement process should start in this fiscal year to avoid delay in the materials since, as it is happening in the whole industry, the material acquisition lead time is extensive (6 to 12 months).		\$ 743,176.00	\$ -	\$ 743,176.00	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: FEMA Approved Project # 669233 includes subjects associated with the described scope.	The requested funds are intended for conducting repairs to the unit that are not included in the referenced PW. As previously, the SOWs do not consist in a total Overhaul. This PW only includes main steam and air heater components.	Not Approved. Overhaul on the Unit - not justified. Unit to be retired.	
9	Aguirre	Boiler Improvement U-1 - Aguirre Steam Plant	Unit is scheduled to return by April 30 2023. There are several pending repairs in the air and gases ducts along with air preheaters repairs. If the repairs are not done the unit will remain out of service in the high load and hurricane season. That means the loss of 450 MW for the peak load and hurricane season.		\$ 795,594.00	\$ 795,594.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: FEMA Approved Project # 669233 includes subjects associated with the described scope.	The requested funds are intended for conducting repairs to the unit that are not included in the referenced PW. As previously, the SOWs do not consist in a total Overhaul. This PW only includes repair to the generator Stam Turbine, and not the generator. This "turbogenerator" is the combination of both.	Not Approved. Overhaul on the Unit - not justified. Unit to be retired.	
10	Aguirre	Turbo Generator Improvement Unit 1	Aguirre unit 1 suffered a catastrophic damage in the turbogenerator on August 2022. after a huge effort to identify the spare parts and to refurbish the generator, the unit is scheduled to return by April 30 2023. this unit represents 450 MW loss for the high load and hurricane season.		\$ 3,000,000.00	\$ 3,000,000.00	\$ -	Not Approved with the info submitted (see comments)	\$ -	Please provide detailed information for this additional budget request. Note: Project # 669233, activity P/W1222396 was approved by FEMA for the rehabilitation and installation of this Unit (\$11.16M)	No answer provided for this item.	Not Approved.	



Incremental NME				Exhibit E - Second Review				PREB Determination					
Item	Unit	Description	Justification	Project Cost	Additional Need	FY2022-23	FY2023-24	Approval FY23	Amount \$M	PREB Request of Information	Answers from PREPA	PREB Determination	Amount \$M
11	Aguirre Cycle Combined	Unit 1 - 2 - Generator Rotor Rewind	Force outage; During the month of December this unit had a Force outage by field ground. After testing, it was determined that the generator rotor is grounded. The cost of rewinding this rotor is approximately \$1,600,000. This includes removal work with a crane of 240 tons capacity, transportation to the United States and return to Puerto Rico of the equipment, ring inspection, rotor rewinding, high speed balancing and electrical tests as main works. When these work is carried out, 50 MW are returned to service to the country's electrical system. This represents a capacity for over 10,000 residential customers and gives us the opportunity to continue with the maintenance program of other units.		\$ 1,600,000.00	\$ 1,600,000.00	\$ -	Approved	\$ 1.60	Not presented previously. There is no SOW associated as these damages were reported in December 2022 not associated with Hurricane Maria or any other disaster.	Approved		
12	Aguirre Cycle Combined	Unit 1 - 4 - Generator Rotor Rewind	During the month of December this unit as well as unit 1-2 had a forced outage by field ground. After testing, it was determined that the generator rotor is grounded. The cost of rewinding this rotor is approximately \$1,600,000. This includes removal work with a crane of 240 tons capacity, transportation to the United States and return to Puerto Rico of the equipment, ring inspection, rotor rewinding, high speed balancing and electrical tests as main works. When these work is carried out, 50 MW are returned to service to the country's electrical system. This represents a capacity for over 10,000 residential customers and gives us the opportunity to continue with the maintenance program of other units.		\$ 1,600,000.00	\$ 1,600,000.00	\$ -	Approved	\$ 1.60	Not presented previously. There are No SOW associated as these damages were reported in December Of 2022 not associated with Hurr. Maria or disaster.	Approved		
13	Hydrogas	Spare Generator Breakers for Frame 5000 Hitachi Gas Turbines	Generator breaker replacement for some of the 15 Hitachi Frame 5000 drives		\$ 750,000.00	\$ 225,000.00	\$ 525,000.00	Already Approved (see comments)	\$ -	An SOW (#274) for the amount of \$650K was approved by PREB on 04/13/2022 for this work. Please indicate if this SOW was presented to FEMA/ COR3?	\$945,000 Total of Items 13-18. \$84,000 approved for 2023 on Item 17. \$2,205,000. for 2023-24. These repairs need to be accomplished in the "best time possible" (say less than 3 months?) because the Eleven Peaking Units should be installed in 24 months. Or, should PREPA "select" those that presents "agile" less complex repairs for such function?	Not Approved. These Repairs are proposed to be conducted during the same time that the New Peaking Units are to be installed.	
14	Hydrogas	Procurement of Turbo-Compressor for Frame 5000 Gas Turbines	To reduce the repair time of the Gas units it is recommended to have a backup turbocharger that works on the 15 Frame 5000 units. This turbocharger will give reliability and reduces the time of outage forced of the units.		\$ 1,550,000.00	\$ 465,000.00	\$ 1,085,000.00	Already Approved (see comments)	\$ -	An SOW (#275) for the amount of \$7.8M was approved by PREB on 04/13/2022 for this work. Please indicate if this SOW was presented to FEMA/ COR3?	Repair several peaking units to support the operation while the eleven peaking and black-start units are installed (approximately 24 months). FEMA will not approve funds for both, replacing and repairing these units.	Not Approved. These Repairs are proposed to be conducted during the same time that the New Peaking Units are to be installed.	
15	Hydrogas	Procurement of Speed Reduction Gear for Frame 5000 Gas Turbines	Necessary supply chain to reduce the time of outface of the units		\$ 330,000.00	\$ 99,000.00	\$ 231,000.00	Already Approved (see comments)	\$ -	An SOW (#276) for the amount of \$1.56M was approved by PREB on 04/13/2022 for this work. Please Indicate if this SOW was presented to FEMA/ COR3?	Repair several peaking units to support the operation while the eleven peaking and black-start units are installed (approximately 24 months). FEMA will not approve funds for both, replacing and repairing these units.	Not Approved. These Repairs are proposed to be conducted during the same time that the New Peaking Units are to be installed.	
16	Hydrogas	Exhaust Plenums for Frame 5000 Gas Turbines	Necessary supply chain to reduce the time of outface of the units		\$ 130,000.00	\$ 39,000.00	\$ 91,000.00	Already Approved (see comments)	\$ -	An SOW (#277) for the amount of \$780K was approved by PREB on 04/13/2022 for this work. Please indicate if this SOW was presented to FEMA/ COR3?	Repair several peaking units to support the operation while the eleven peaking and black-start units are installed (approximately 24 months). FEMA will not approve funds for both, replacing and repairing these units.	Not Approved. These Repairs are proposed to be conducted during the same time that the New Peaking Units are to be installed.	
17	Hydrogas	Inlet Duct & Silencer Frame 5000 Gas Turbines	Necessary supply chain to reduce the time of outface of the units		\$ 280,000.00	\$ 84,000.00	\$ 196,000.00	Approved	\$ 0.084	Not presented previously. There is no SOW associated with these parts.	This unit was previously approved.		
18	Hydrogas	Exhaust Gas Diffusion (Deflector) for Frame 5000 Gas Turbines	Necessary supply chain to reduce the time of outface of the units		\$ 110,000.00	\$ 33,000.00	\$ 77,000.00	Already Approved (see comments)	\$ -	An SOW (#278) for the amount of \$390K was approved by PREB on 04/13/2022 for this work. Please indicate if this SOW was presented to FEMA/ COR3?	Repair several peaking units to support the operation while the eleven peaking and black-start units are installed (approximately 24 months). FEMA will not approve funds for both, replacing and repairing these units.	Not Approved. These Repairs are proposed to be conducted during the same time that the New Peaking Units are to be installed.	
		Total			\$ 30,198,770.00	\$ 23,340,594.00	\$ 6,858,176.00	Total Approved FY23	\$ 3.734			TOTAL	\$ 2.65
												GRAND TOTAL	\$ 6.384

