

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

**NEPR**

**Received:**

**Jun 8, 2023**

**3:39 PM**

**IN RE:**

REVIEW OF LUMA'S INITIAL BUDGET

**CASE NO.:** NEPR-MI-2021-0004

**SUBJECT:** Motion Submitting Supplemental Response to ROIs in Compliance with May 31 Order.

**MOTION SUBMITTING SUPPLEMENTAL RESPONSE TO REQUEST FOR  
INFORMATION IN COMPLIANCE WITH MAY 31 ORDER**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR, LLC** ("Genera PR"), through its counsel of record, and respectfully state and request the following:

1. On May 31, 2023, this Puerto Rico Energy Bureau ("Energy Bureau") entered a Resolution and Order titled "*Third Requirement of Information ("ROI") – Review of LUMA's Proposed Consolidated FY 2024 Budgets: GENERA's Necessary Maintenance Expenses ("NME")*" ("May 31 Order") whereby it ordered Genera PR to respond to the Requirement of Information ("ROI") set forth in Attachment A to the May 31 Order.

2. On June 7, 2023, Genera PR filed a *Motion Submitting Responses to Request for Information in Compliance with May 31 Order*; whereby it submitted responses to the ROI in accordance with the May 31 Order.

3. Notwithstanding, on the same day, Genera PR respectfully submitted an *Urgent Request for Brief Extension of Time to Submit Response in Compliance with Resolution and Order of May 31, 2023*, whereby it requested an extension of time until 6:00 PM on June 8, 2023, to provide its responses to outstanding items 18 and 28 related to the NME projects, as well as items 12, 42, and 44 pertaining to the additional NME projects of the ROI.

4. Considering the above and in compliance with the May 31 Order, Genera PR herein includes respectfully its response to the outstanding items of the third ROI, as outlined in Attachment A of the May 31 Order, as *Exhibit I*.

**WHEREFORE**, Genera PR respectfully requests that this Honorable Energy Bureau **take notice** of the above and **deem** Genera PR to be in compliance with the May 31 Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 8<sup>th</sup> day of June 2023.

**ECIJA SBGB**  
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## CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to Joannely Marrero-Cruz, at [jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law); Maralíz Vázquez-Marrero, at [mvazquez@diazvaz.law](mailto:mvazquez@diazvaz.law); Margarita Mercado Echegaray, at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); and Ana Margarita Rodríguez Rivera, at [ana.rodriguezrivera@us.dlapiper.com](mailto:ana.rodriguezrivera@us.dlapiper.com).

In San Juan, Puerto Rico, this 8th day of June 2023

s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo

Exhibit I

*Genera PR's Supplement Response to PREB's Third ROI*

## Supplement to Response to GenCo ROIs in compliance with May 31, 2023 Order

### TAB: Genera NME Inc in Budget

#### Aguirre Power Plant

52

##### Row 18

- a. Aguirre and Costa Sur Steam Plants share the same Motor Driven Boiler Feed Pumps. The internal bundle (rotor Impeller and diaphragm assembly) is susceptible to damage. Has GENERA found the cause of this internal bundle deficiency? If not, why not? Has a root cause analysis been performed to identify mechanisms that will help avert this damage? If not, why not?

#### GPR-PREB-ROI3-05-31 #52

As per the personnel at the Costa Sur power plant, PREPA hasn't conducted a thorough root cause analysis. Notably, each Costa Sur unit comprises four motor pumps, whereas each Aguirre unit has a single pump. For the Costa Sur to operate at full capacity, both pumps must be functional simultaneously, whereas only one pump is necessary to start and operate the Aguirre unit. Currently, the control valve at Costa Sur is damaged, and it's being operated with isolators. However, in case of a load fluctuation within a pump, overheating may occur, leading to potential failures.

#### Costa Sur Power Plant

53

##### Row 28

- a. Related to the Boiler Feed Pump. PREPA developed a Root Cause Analysis with the OEM to determine the problem that causes the periodic pump rotor bundle breakage.

- i. Does this damage continue to occur in the rotors? Describe how the recommendations presented by the OEM have been followed during the repairs of the pump.
- ii. What specific equipment parts are being identified for replacement? Why?
- iii. Were induced draft fans, forced draft fans, and gas-recirculating fans tested using nondestructive techniques to identify their metallurgical integrity?

**GPR-PREB-ROI3-05-31 #53**

- a. As per the personnel at the Costa Sur power plant, PREPA hasn't conducted a thorough root cause analysis. The two valves that are not functioning properly have yet to be fixed. The absence of a control valve in the recirculating boiler feed pump results in water fluctuations whenever there is a load fluctuation, as the unit is currently being operated using manual valves.
  - i. Genera is not aware and respectfully requests that this question is addressed to PREPA.
  - ii. The equipment that must be replaced are boiler feed water pumps, feedwater heaters, air heater baskets, condensing recirculating water pump vertical motor, main condensing pump vertical motor and boiler circulating water pump horizontal motor. These parts are critical day-one spare parts.
  - iii. This activity was performed in the past. This project will be performed in the first year of operations.

TAB: Genera Additional NME

All Power Plants

54

Row 12

- a. Describe how this activity supports the GenCo safety program and compliance with OSHA requirements.
- b. Provide a budget breakdown that shows how this activity covers all employees with duties at the thermal generation facilities.

GPR-PREB-ROI3-05-31 #54

HSEQ 500K Additional Budget	Comments	
AED Program	Defibrillators and infirmary equipment for medical emergencies	\$ 14,000.00
First Responder Equipment	Equipment for environmental, safety, and medical emergencies	\$ 160,500.00
Lockout Tagout Program Devices	Replacement of devices for lockout tagout (LOTO) programs	\$ 60,000.00
Electric Safety Equipment	Tags, signage, and security devices for electrical equipment	\$ 62,500.00
ARC Flash Equipment	Upgrade of electrical safety PPE for current and new employees	\$ 13,000.00
Gas Detectors	Confined spaces and areas gas detector upgrade	\$ 15,000.00
PPE Upgrade	Replacement of PPE for new and current employees	\$ 175,000.00
		<b>\$ 500,000.00</b>

## Mayaguez Power Plant

55

Row 42

- a. Describe GENERA negotiation efforts aimed at managing the costs associated with this activity.

### **GPR-PREB-ROI3-05-31 #55**

This project is included in the additional suggested projects that are not part of the proposed budget at the time. Should PREB identify additional funds for these projects, Genera would begin negotiating this contract. The contract is with PW Power Systems, the manufacturer of the units. Thus, there is no space for competitive processes, which is the most effective way to manage costs. Consequently, Genera will procure only those services that are needed and will negotiate with the contractor to obtain the best prices possible. If the funds are identified and Genera is allowed to continue with these projects, Genera will update PREB on these negotiations.