

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

<b>NEPR</b>  <b>Received:</b>  <b>Jun 16, 2023</b>  <b>6:39 PM</b>
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**IN RE:**

REVIEW OF LUMA’S INITIAL BUDGET

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

**SUBJECT:** Motion to Submit Genera PR LLC’S Supplemental Responses to the June 9 Order.

**MOTION TO SUBMIT GENERA PR LLC’S SUPPLEMENTAL RESPONSES  
TO THE JUNE 9 2023 BENCH 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 3, 2023, the Energy Bureau of the Puerto Rico Regulatory Board (“Energy Bureau”) issued a Resolution and Order (the “May 3 Resolution”) in which it established the procedural calendar in the case of caption. This calendar was subsequently modified through a Resolution and Order issued on May 8, 2023, by the Energy Bureau.

2. The modified procedural calendar mandated a Virtual Technical Conference to be held on June 9, 2023.

3. On June 9, 2023, Genera PR participated in the Technical Conference convened to discuss the respective budget filings and Request of Information (“ROI”) responses submitted by LUMA Energy, LLC, Genera PR and the Puerto Rico Energy Power Authority (“PREPA”) (the “June 9 Technical Conference”).

4. During the June 9 Technical Conference, the Energy Bureau issued seven (7) bench orders addressed to Genera PR (“June 9 Bench Orders”), requesting: (1) an outage and maintenance schedule assuming temporary power continues throughout FY2024, with T&D System Operator

sign-off and an associated budget; (2) information on local vendor parts; (3) a description of services provided by law firms; (4) a detailed allocation for the \$15 million of shared services in the budget; (5) examples of non-recurring services for the next fiscal year as cost-saving measures; (6) details and disclosure of proposed funding for cybersecurity; and (7) a list of critical day-one spare parts needed along with expected lead times.

5. On June 15, 2023, Genera PR file a motion titled *Motion to Submit Genera PR LLC's Responses in Compliance with the June 9 2023 Bench Order* (the "June 15 Motion") in which it provided responses to the first six (6) bench orders by submitting *Exhibit A – Supplemental Response to 06-09-2023 Technical Conference Bench ROI*, *Exhibit B – GPR-PREB-Bench-ROI-06-09 #1*, and *Exhibit C – GPR-PREB-Bench-ROI-06-09 #3*

6. In the June 15 Motion, Genera PR also requested an extension of time to submit the response to Bench Order #7 concerning a list of critical day-one spare parts and expected lead time.

7. In compliance with the extension requested, Genera PR hereby submits its response to June 9 Bench Order #7 as *Exhibit D - Supplemental Response to 06-09-2023 Technical Conference Bench ROI & Table GPR-PREB-Bench-ROI-06-09 #7*.

8. Genera PR respectfully informs that Table GPR-PREB-Bench-ROI-06-09 #7 in Exhibit D is not the final version of the table. Genera PR commits to providing an updated version of the table in the coming days.

**WHEREFORE**, Genera PR respectfully requests that this Honorable Energy Bureau **accept** the submissions in this Supplemental Response as fulfillment of the June 9 Bench Orders and **acknowledge** Genera PR's commitment to submit the updated table as outline herein.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 16<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 16th day of June 2023

*/s/ Alejandro López-Rodríguez*  
Alejandro López-Rodríguez

Exhibit D

Supplemental Response to 06-09-2023 Technical Conference Bench ROI

& GPR-PREB-Bench-ROI-06-09 #7

## Supplemental Response to 06-09-2023 Technical Conference Bench ROI

7. Provide an inventory of parts and existing components. Including the cost estimate schedule.

GPR-PREB-Bench-ROI-06-09 #7 – Attached.

The attached table is currently being extensively revised with information provided by the Plant Managers and vendors. Genera is diligently working to ensure that the table reflects the most recent information accurately. Genera is fully aware of the significance of providing PREB with precise and up-to-date data. Consequently, Genera expects to present the revised table, incorporating additional critical parts, cost, and estimated time of delivery, within a week. This timeframe will enable Genera to thoroughly review and integrate any necessary changes to fulfill this request.

## Genera PR | Critical Replacement Parts

### CRITICAL REPLACEMENT PARTS

Name of the Plant	Equipment	Description / Specifications	Unit Cost	Required Quantities	Total Cost	Lead Time (Days)
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Boiler feed water pumps	\$ 2,000,000	6	\$12,000,000	52 weeks
Costa Sur 5&6	Steam Turbine	Feedwater Heaters 6	\$ 1,500,000	2	\$3,000,000	52 weeks
Costa Sur 5&6	Steam Turbine	Feedwater Heaters 7	\$ 2,400,000	2	\$4,800,000	52 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Air heater baskets (cold and hot)	\$ 1,500,000	3	\$4,500,000	26 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Condensing Circulating Water Pump Vertical motor 1000HP, 4000/66	\$ 848,100	9	\$7,632,900	28 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Main Condensing Pump Vertical motor 500HP, 4000 / 66	\$ 502,355	8	\$4,018,840	28 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000/90	\$ 198,000	12	\$2,376,000	28 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	Boiler Feed Pump Horizontal Motor 4500HP	\$ 397,721	8	\$3,181,768	28 weeks
Costa Sur 5&6/Aguirre 1&2	HRSG/Boiler	IDF Horizontal Motor 1750HP, 4000/580	\$ 445,000	8	\$3,560,000	28 weeks
Costa Sur 5&6/Aguirre 1&2	Condensate	Continuous Condenser Wash	\$ 500,000		-	52 weeks
Palo Seco 3&4	HRSG/Boiler	Air Heaters	\$ 750,000	1	\$750,000	28 weeks
Palo Seco 3&4	Generator	Hydrogen cooler	\$ 870,000	2	\$1,740,000	20 weeks
Palo Seco 3&4	Generator	Turning Gear Assembly	\$ 300,000	1	\$300,000	30 weeks
Aguirre 1	Steam Turbine	Feedwater Heaters 7	\$ 3,000,000	1	\$3,000,000	52 weeks
Aguirre 2	Steam Turbine	Feedwater Heaters 3	\$ 1,500,000	2	\$3,000,000	52 weeks
San Juan 5 & 6		GT fully bladed rotor	\$9,000,000	1	\$9,000,000	72 weeks
Palo Seco 3&4	Steam Turbine	Set of open and close hardware - honeycomb seals, etc.	\$ 3,500,000	1	\$3,500,000	30 weeks
Costa Sur 5&6		Traveling screens	\$ 1,000,000	5	\$5,000,000	
Aguirre		Traveling screens	\$ 1,000,000	5	\$5,000,000	
Palo Seco 3&4		Deareator pump	\$ 600,000	1	\$600,000	
Palo Seco 3		Water heater 5		1	-	
Palo Seco 3&4		Reduction station atemperatures	\$ 75,000	2	\$150,000	
Palo Seco 3&4		Fixed screens	\$ 100,000	7	\$700,000	
Palo Seco 3&4		Fuel pump	\$ 500,000	1	\$500,000	

Palo Seco 3&4	Breakers 480 & 4160	\$ 500,000	1	\$500,000	
Palo Seco 4	Recirculating valves	\$ 175,000	1	\$175,000	
San Juan 5	Continuous Condenser Wash	\$ 2,300,000	1	\$2,300,000	40 weeks
San Juan 5 & 6	GT compressor wash		2	-	
San Juan 7	Continuous Condenser Wash			-	
San Juan 7	Circulating pumps		2	-	
San Juan 5,6,7	Traveling screens		1	-	
San Juan 9	Traveling screens		1	-	
San Juan 9	Recirculating fan duct and GRF		1	-	
San Juan 7	cooling tower		1	-	
Aguirre CC 2-3	GT compressor rotor		1	-	
Aguirre CC 2-3	Turbine section Stage 1, 2 & 3	\$ 1,000,000	1	\$1,000,000	
Aguirre CC 2-3	Torque converter	\$ 350,000	1	\$350,000	
Aguirre CC 2-3	switch gears 4kv		2	-	
Aguirre CC	Condensing Circulating Water Pump		2	-	
Aguirre CC	boiler feed pumps		2	-	
Aguirre CC	cooling tower motors		10	-	
Aguirre CC 2-3	generator breaker 13kv		1	-	
Aguirre CC 2-3	Exhaust duct		1	-	
Cambalache 3	Fill shutoff valves	\$102,000	1	\$102,000	
Cambalache 3	Trip shutoff valve	\$102,000	1	\$102,000	
Cambalache 3	Nozzle valve	\$90,000	1	\$90,000	
Cambalache 3	leakage valve	\$90,000	1	\$90,000	
Cambalache 3	fuel control valve		1	-	
Cambalache	overhead crane	\$ 750,000	1	\$750,000	
Cambalache	leak detection system - fuel transfer line	\$ 500,000	1	\$500,000	
Cambalache	feedwater pump and motor	\$ 150,000	1	\$150,000	
Cambalache	demin water resin	\$ 400,000	1	\$400,000	
Cambalache 2,3	steam bypass valve		2	-	
Cambalache 2,3	steam release valve		2	-	
Cambalache	fire protection system	\$ 300,000	1	\$300,000	
Cambalache	generator breaker 13kv	\$ 500,000	1	\$500,000	
Cambalache	DCS	\$ 3,000,000	1	\$3,000,000	
Cambalache	high speed control	\$ 1,000,000	1	\$1,000,000	
Cambalache 2,3	safety valve		4	-	
Mayaguez	Fuel skid pumps	\$ 15,000	1	\$15,000	
Mayaguez	Fuel skid solenoid valves	\$ 15,000	2	\$30,000	
Mayaguez	Fuel Transfer valve	\$ 10,000	1	\$10,000	
Mayaguez	Clutch removal kit	\$ 30,000	4	\$120,000	



Mayaguez	DCS	\$ 3,000,000	1	\$3,000,000
Mayaguez	Demin RO system pump	\$ 150,000	2	\$300,000
Mayaguez	EDI system	\$ 25,000	2	\$50,000