

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

**NEPR**

**Received:**

**Jul 5, 2023**

**8:31 PM**

**IN RE:** REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY'S 10-  
YEAR INFRASTRUCTURE PLAN –  
DECEMBER 2020

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

**SUBJECT:** Motion to Submit PREPA's June 2023 Update to the PREPA-LUMA 90-Day Plan for Generation Projects and Request for the Energy Bureau to Accept PREPA's 90-Day Plan for the Previous Four Quarters

**MOTION TO SUBMIT PREPA'S JUNE 2023 UPDATE TO THE PREPA-LUMA 90-DAY  
PLAN FOR GENERATION PROJECTS AND REQUEST FOR THE ENERGY BUREAU  
TO ACCEPT PREPA'S 90-DAY PLAN FOR THE PREVIOUS FOUR QUARTERS**

COMES NOW the Puerto Rico Electric Power Authority (PREPA), through its counsel of record, and respectfully submits and requests as follows:

1. On March 26, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau") entered a *Resolution and Order* (the "March 26 Order") requiring PREPA to, among other things, "continue reporting to the Energy Bureau and FEMA, within the next five (5) years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau".<sup>1</sup>
2. On July 15, 2021 LUMA<sup>2</sup> submitted before this Energy Bureau a document titled and *Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed during the Technical Conference* ("July 15<sup>th</sup> Motion") wherein LUMA proposed, among others, that reporting in this docket be done quarterly and that updates to the 90-Day Plan in relation to the 10-Year Infrastructure Plan be

---

<sup>1</sup> March 26 Order at p.19.

<sup>2</sup> Luma Energy, LLC and LUMA Energy ServCo LLC, jointly referred to as "LUMA".

provided to the Energy Bureau during the last month of every quarter as it is provided to FEMA. *See* July 15 Motion at pages 8-9.

3. Thereafter, on September 21, 2021, PREPA and LUMA filed a joint motion titled *Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan* (“September 21 Motion”). In the September 21 Motion, LUMA and PREPA informed that going forward, they would continue to file the PREPA-LUMA 90-Day Plans, instead of 90-Day updates of the 10-Year Infrastructure Plan given that FEMA was only requiring the 90-Day Plans. *See* September 21 Motion at page 4.

4. PREPA hereby submits, as Exhibit 1 to this Motion, the June 2023 update to the PREPA-LUMA 90-Day Plan for the generation projects (“June 2023 PREPA-LUMA 90-Day Plan”) including and updating the status of PREPA’s Generation Projects and providing a summary of key next steps for the upcoming 90 days in relation to the 10-Year Infrastructure Plan.

5. In addition, as Exhibit 2 to this Motion, PREPA submits for the Energy Bureau’s information the 90-day plans for the previous four quarters<sup>3</sup>. PREPA respectfully requests this Energy Bureau to accept the outstanding PREPA 90-day plans including the information for the generation projects.

6. PREPA will continue to submit the 90 days plans during the last month of each quarter pursuant to the July 15 Motion.

**WHEREFORE**, PREPA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept** the June 2023 PREPA-LUMA 90-Day Plan submitted herein as **Exhibit 1** and the 90-Day Plans for the previous quarters included as **Exhibit 2** to this Motion.

---

<sup>3</sup> PREPA-LUMA 90-Day Plan dated June 2022; PREPA-LUMA 90-Day Plan dated September 2022; PREPA-LUMA 90-Day Plan dated December 2022; PREPA-LUMA 90-Day Plan dated March 2023.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 5<sup>th</sup> day of July 2022.

s/ Maralíz Vázquez-Marrero

Maralíz Vázquez-Marrero

[mvazquez@diazvaz.law](mailto:mvazquez@diazvaz.law)

TSPR No. 16,187

s/ Joannely Marrero Cruz

Joannely Marrero Cruz

[jmarrero@diazvaz.law](mailto:jmarrero@diazvaz.law)

TSPR No. 20,014

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.

290 Jesús T. Piñero Ave.

Oriental Tower, Suite 803

San Juan, PR 00918

Tel. (787) 395-7133

Fax. (787) 497-9664

## **CERTIFICATE OF SERVICE**

It is hereby certified that I have filed the foregoing with the Clerk of the Energy Bureau using the electronic filing system using <https://radicacion.energia.pr.gov/login> and also, that I have served a copy on LUMA Energy, LLC and LUMA Energy ServCo, LLC through their counsel of record at [laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com) and [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com).

In San Juan Puerto Rico on this 5<sup>th</sup> day of July 2023.

/s Joannely Marrero Cruz  
Joannely Marrero Cruz

Exhibit 1

*PREPA-LUMA 90-Day Plan June 2023*



FEMA



# PREPA-LUMA 90-Day Plan

June 2023



Puerto Rico Electric  
Power Authority



TABLE OF CONTENTS

I. Introduction..... 3

II. Overview of Focus Areas for the Next 90-Days..... 3

III. PREPA Estimated Schedule for Submission of *Detailed SOWs* ..... 7



## I. Introduction

In accordance with the directive received from FEMA to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for PREPA's T&D System as outlined within the O&M Agreement (OMA) between PREPA, P3A, and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and are now the responsibility of LUMA.

This 90-Day Plan provides information on areas of coordination between PREPA and LUMA as well as focus areas specific to each.

## II. Overview of Focus Areas for the Next 90-Days

The content below summarizes next steps across the following six areas: 1) PREPA-LUMA Coordination and Alignment; 2) Federal Grant Management; 3) Funding and Reporting; 4) Environmental and Historic Preservation; 5) Engineering Management; and 6) Enterprise Project Management ("EPM").

### **PREPA-LUMA Coordination and Alignment**

#### PREPA and LUMA Focus Areas

- PREPA and LUMA leadership are participating in regular weekly meetings with COR3 & FEMA to ensure visibility of progress of project work, ensure the coordination and understanding of common matters, and to identify and resolve risks that involve points of integration between the two entities.
- PREPA and LUMA will continue coordination to support successful operations under the OMA.
- Delegation of Authority has been provided to LUMA personnel as Authorized Representative following Board Resolution mandates.

### **Federal Grant Management**

#### PREPA Focus Areas

- A total of 105 SOW (\$370M) were submitted to the Puerto Rico Energy Bureau (PREB) for approval out of which 99 have been approved and 4 deferred for further review.
  - Projects include rehabilitation, improvement, and repairs to various generation units to recover load generation capacity and reliability,





reducing load shedding events to citizens and commercial and industrial sectors. In addition, improvements to fuel tanks and fire protection and cooling systems to address compliance standards under NFPA and CWA were also submitted.

- PREPA is working alongside FEMA and COR3 to organize approved SOWs into logical grouping for Project Formulation submissions (*Detailed SOWs*).
- The logical grouping of SOWs takes into consideration EHP limitations to evaluate all environmental impacts under one area.
- PREPA submitted a total of 16 FEMA projects (*Detailed SOWs*) including:
  - Rio Blanco Hydroelectric System
  - Toro Negro Hydroelectric System
  - Cambalache Power Plant – Flood Protection Barrier (406 mitigation)
  - Guayabal Dam Seismic Retrofit
  - Guajataca Dam – Permanent Repairs
  - Reservoir Dredging Projects (11): Dos Bocas, Caonillas, Guayabal, Matrullas, Guineo, Loco, Guayo, Lucchetti, Guajataca, Guerrero, Garzas
- PREPA continues to revise *Detailed SOWs* in accordance with FEMA EHP feedback and comments.
- Once the remaining SOWs receive regulatory approval, PREPA will continue with its *Detailed SOWs* submission.
- Continue advancing work on other 428 projects towards finalizing *Detailed SOWs* for submission to COR3 and FEMA. This effort will include 406 Hazard Mitigation and EHP work.
- Evaluate potential impacts on Cost-share matching funding from CDBG-DR and central government. Assess impacts on funding limitations if global match guidelines are not granted.
- Develop and submit SOWs on IT/Telecomms subset allocation to include physical security, Cyber Security and emergency backup within 6 generation plants (Aguirre, Palo-Seco, Cambalache, San Juan, Mayaguez and Costa Sur).
- Submit progress and financial quarterly reports for period ending 06/30/2023 on all 428 and 404-obligated projects.

### Environmental and Historic Preservation

#### PREPA Focus Areas



- For emergency generation projects PREPA prepared an all-inclusive EHP checklist by site taking into consideration that all projects have similar scope and very limited implications in environmental matters
  - Checklists have been completed for all power plants and have been presented alongside Detailed SOW submissions.
  - Completion of EHP Checklist for Hydrogas Gas Turbine Installations is underway and to be completed within the following quarter once detailed SOW is completed.
- Provide support in the development of FEMA Programmatic Environmental Assessment for all dredging activities to be performed island-wide.
  - Proposed actions and alternative analysis were provided to FEMA for review. Request for information period was finalized and completed. PREPA is awaiting FEMA's determination on next course of action.
- Continue development of preliminary engineering report to establish methodology and locations regarding disposition of dredging materials produced by FAASt dredging projects.
- Implement an independent public notification program that meets FAASt and EHP requirements within PREPA website. Current actions to complete entail establishing an "inquiry information" platform.
- Complete EHP checklist and documentation requirements for the following projects once Detailed SOW have been completed:
  - Toro Negro Hydroelectric System
  - Rio Blanco Hydroelectric System

### Engineering Management

#### PREPA Focus Areas

- Dredging Projects – Bathymetric studies have been initiated. Floor sampling plans have been submitted and approved by FEMA EHP.
  - PREPA is currently working on a Presentation to local state regulators for Sampling methodology and approval. Once approved PREPA will initiate sampling procedures and determine the management of disposal of dredging debris.
- Guajataca Dam – Project requires specialized skillsets and thus management is finalizing the evaluation of the contract structure to receive such services.
  - Meeting to be held with all stakeholders to discuss eligibility on procurement and contracting structure.
  - Meeting to be held with FEMA, USACE, and other stakeholders to discuss eligibility of *Detailed SOW* and cost estimate.



- PREPA has finalized several projects technical specification and class 3 estimates in support of their Detailed SOWs submissions. 406 mitigation packages to be developed in the next 90 days.
  - Toro Negro Hydroelectric System Connection
  - Rio Blanco Hydroelectric System
- Costa Sur & Yabucoa Black Starts –Technical specifications completed. The RFP for EPC competitive process was published, and proponents are under evaluation by the assigned committee.
- Irrigation Channels – A&E contractor currently performing site evaluations for design execution.

### Enterprise Project Management (“EPM”)

#### PREPA Focus Areas

- Continue managing project schedules, tasks, budgets, and progress in PREPA’s system of record, MS Project Online.
- Continue refining project management controls and artifacts aligned with federal requirements.
- Monitor and manage implementation progress through the EPM program.

### III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Generation Emergency projects *Detailed SOWs* once approved by PREB. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the third quarter of 2023, all of which are Generation projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

Table 1.1 – PREPA 2023 Q3 Project Submittal Milestone

\*\*\*Dams/Hydro projects estimated construction date is based on the starting date of the bathymetric studies

							Construction Progress			
#	PW	FEMA ID	Project Title	Asset	Project Formulation Status	DSOW Submission Estimate	Stage	Commencement Date	Date of Completion	Overall Percentage of Completion
1		Pending	FAASt San Juan Plant – Unit 10	Generation	Pending PREB Approval	Pending	Planning & Design	Pending	Pending	0%
2		164988	FAASt New Black Start System at Costa Sur	Generation	Developing DSOW	Mar-23	Procurement	Jun-23	May-26	2%
3		169340	FAASt Cambalache Power Plant – Flood Protection Barrier	Generation	Developing DSOW	Mar-23	Planning & Design	Jan-23	Dec-23	25%
4		164966	FAASt New Black Start System at Aguirre (Yabucoa)	Generation	Developing DSOW	Mar-23	Procurement	Oct-22	Jun-24	2%
5		670036	FAASt Fire Pump for Aguirre Power Complex (AG-004)	Generation	Developing DSOW	Jun-23	Planning & Design	Aug-23	Jan-24	0%
6		Pending	FAASt Hydro Gas Permanent Repairs	Generation	Developing DSOW	Jun-23	Planning & Design	Jan-23	Dec-24	0%
7		435769	FAASt South Coast Irrigation District - Canals	Dams, Irrigation Channels & Reservoirs	Developing DSOW	May-23	Planning & Design	Jun-23	Nov-23	5%
8		436468	FAASt Toro Negro Hydroelectric System Connection	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Jun-23	Planning & Design	Jun-22	Dec-23	20%
9		180723	FAASt Rio Blanco Hydroelectric System	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Jul-23	Planning & Design	Aug-22	Mar-24	35%
10		436467	FAASt Isabela Irrigation District - Canals	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Aug-23	Planning & Design	Jun-23	Nov-23	5%
11		435769	FAASt South Coast Irrigation District - Canals	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Aug-23	Planning & Design	Jun-23	Nov-23	5%
12		436462	FAASt Lajas Irrigation Canals	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Aug-23	Planning & Design	Jun-23	Nov-23	5%
13		436621	FAASt Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Aug-23	Planning & Design	Jun-23	Nov-23	5%

# PREPA-LUMA 90-Day Plan



Puerto Rico Electric  
Power Authority



FEMA

							Construction Progress			
#	PW	FEMA ID	Project Title	Asset	Project Formulation Status	DSOW Submission Estimate	Stage	Commencement Date	Date of Completion	Overall Percentage of Completion
14	9312	180692	FAASt Mobile Generation Units Purchases	Generation	Approved	Obligated	Completed	N/A	Dec-19	100%
15	10080	334509	FAASt Palo Seco Demin Water Tank 4	Generation	Approved	Obligated	Completed	N/A	Dec-21	100%
16	10571	669498	FAASt Aguirre Power Plant Infrastructure Projects 001	Generation	Approved	Obligated	Construction In Progress	Apr-22	Apr-23	42%
17	10568	669233	FAASt Aguirre Power Plant 002 Units 1 & 2 Projects	Generation	Approved	Obligated	Construction In Progress	Mar-22	Aug-23	61%
18	10622	669815	FAASt Aguirre Power Plant 003 Combined Cycle	Generation	Approved	Obligated	Construction In Progress	Mar-22	Feb-24	79%
19	10615	662947	FAASt San Juan 001 – Units 5 & 6	Generation	Approved	Obligated	Construction In Progress	Feb-22	Mar-24	65%
20	11085	687480	FAASt San Juan Plant – Units 7 & 8	Generation	Approved	Obligated	Construction In Progress	Dec-22	Dec-23	25%
21	10608	667744	FAASt San Juan Power Plant - Auxiliary Infrastructure	Generation	Approved	Obligated	Construction In Progress	Jul-22	Apr-23	89%
22	10702	672950	FAASt Costa Sur Permanent Repairs 5 & 6	Generation	Approved	Obligated	Construction In Progress	Sep-21	Oct-24	36%
23	10694	673006	FAASt Costa Sur Permanent Repairs	Generation	Approved	Obligated	Construction In Progress	Jul-22	Nov-23	13%
24	10606	662957	FAASt Palo Seco Steam Plant Unit 3-4	Generation	Approved	Obligated	Construction In Progress	Mar-22	Jan-24	44%
25	10609	671481	FAASt Palo Seco Steam Plant Permanent Repairs	Generation	Approved	Obligated	Construction In Progress	Aug-22	Jun-24	38%
26	10607	663383	FAASt Cambalache Power Plant Permanent Repairs	Generation	Approved	Obligated	Construction In Progress	Aug-22	Jun-24	87%
27	10455	663385	FAASt Mayaguez Hydro-Gas Power Plant Permanent Repairs	Generation	Approved	Obligated	Completed	Mar-22	Jul-22	100%



## Exhibit 2

[0148-20230705-Exhibit 2- PREPA-LUMA 90-Day Plans June 2022 to March 2023](#)