

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

NEPR

Received:

Aug 15, 2023

6:52 PM

IN RE:
LUMA'S RESPONSE TO HURRICANE
FIONA

CASE NO. NEPR-MI-2022-0003

**SUBJECT: Nineteenth Update on Stabilization Plan
and Request for Confidential Treatment of Portions
Thereof**

**MOTION SUBMITTING NINETEENTH UPDATE ON STABILIZATION PLAN FOR
TEMPORARY EMERGENCY GENERATION CAPACITY AND REQUEST FOR
CONFIDENTIAL TREATMENT OF PORTIONS THEREOF**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo"), (jointly referred to as "LUMA"), and respectfully state the following:

**I. Submission of Nineteenth Update on Stabilization Plan for Temporary
Emergency Generation Capacity**

1. In a Resolution and Order of October 7, 2022 ("October 7th Order") with the subject "Baseload Generation Dispatch Status-Post Hurricane Fiona," this honorable Puerto Rico Energy Bureau ("Energy Bureau") convened a Technical Conference to discuss concerns raised by LUMA in a letter dated October 6, 2022, regarding Resource Adequacy and potential Generation resource deficiencies following Hurricane Fiona. Per the October 7th Order, the topics to be discussed at the Technical Conference were "(i) Dispatch Status of the available Baseload Generation post Hurricane Fiona and (ii) the identified temporary emergency mitigation measures thought to address the generation deficiencies arising from Hurricane Fiona."¹

¹ The Technical Conference was held as scheduled on October 11, 2022. During the Technical Conference, the Energy Bureau and consultants for the Energy Bureau posed questions to LUMA's representatives.

2. On October 12, 2022, the Energy Bureau entered a Resolution and Order whereby it ordered LUMA to develop a stabilization plan as a direct response to Hurricane Fiona, in coordination with the Federal Emergency Management Agency (“FEMA”) and the Puerto Rico Electric Power Authority (“PREPA”) “to address any baseload generation inadequacy or shortfall that affects the dispatch availability and has the potential to cause load shedding or a blackout event of the electric system (“Stabilization Plan”)” (“October 12th Order”).

3. Per the October 12th Order, LUMA was directed to submit the 1st and the 15th day of each month from the notice of the Order, an updated report addressing the efforts conducted by LUMA to assure the completion of the Stabilization Plan.

4. On October 31st, 2022, LUMA submitted the First Update on the Stabilization Plan.

5. On November 1, 2022, this Energy Bureau held a technical conference for November 1, 2022 (“October 27th Order”) in connection with the first update on the Stabilization Plan. LUMA representatives appeared to discuss the Stabilization Plan and answered questions by this Energy Bureau.

7. On November 15, 2022, LUMA submitted a Second Update on the Stabilization Plan (“Second Update”). In addition, LUMA submitted supplemental information to the Second Update arising from a joint press conference of November 15th, 2022, where the Governor of Puerto Rico, the Hon. Pedro Pierluisi and the Federal Coordinator for the Federal Emergency Management Agency (“FEMA”), Nancy Casper, announced that FEMA’s power stabilization initiative aims to install between 600 to 700 MW of temporary emergency generation capacity through the mobilization of power generation maritime barges and temporary land-based generators. *See Supplemental Submission to Second Update on Stabilization Plan to Inform of*

Announcement by the Puerto Rico Government and FEMA on Temporary Emergency Generation Capacity, filed on November 15, 2022.

8. On December 1st, 2022, LUMA submitted the Third Update on the Stabilization Plan.

9. The most recent updates to the Stabilization Plan were filed on December 1st, 2022 (Third Update), December 15, 2022 (Fourth Update), January 17, 2023 (Fifth Update); January 31, 2023 (Sixth Update); February 14, 2023 (Seventh Update); March 1, 2023 (Eight Update); March 15th (Ninth Update); April 3rd (Tenth Update); April 17th (Eleventh Update); May 1, 2023 (Twelfth Update); May 15, 2023 (Thirteenth Update); June 1st, 2023 (Fourteenth Update); June 15, 2023 (Fifteenth Update); July 3rd, 2023 (Sixteenth Update); July 17th, 2023 (Seventeenth Update), and August 1st, 2023 (Eighteenth Update).

10. In compliance with the October 12th Order, LUMA hereby submits as *Exhibit 1*, the Nineteenth Update on the Stabilization Plan (“Nineteenth Update”). The Nineteenth Update includes, among others, a summary of the status of the Stabilization Plan; and the status of construction activities at the San Juan site and Palo Seco site. Finally, the Nineteenth Update identifies the current scenario of generation availability and loss of load expectation (LOLE) days by month.

11. LUMA redacted portions of *Exhibit 1* and respectfully requests that those portions be kept confidential by this honorable Energy Bureau pursuant to the Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, and partially amended on September 16, 2016 and in accordance with the confidential nature of the December 20th closed Technical Conference. In compliance with this policy, LUMA hereby submits its Memorandum of Law in support of its request for confidentiality setting forth the legal

basis for which LUMA is entitled to file portions of the Nineteenth Report under the seal of confidentiality. As explained below, the Energy Bureau should protect several pictures included in *Exhibit I* from public disclosure as they contain CEII as defined in federal regulations and the Energy Bureau's Policy on Management of Confidential Information. *See* 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674; Energy Bureau's Policy on Management of Confidential Information.

II. Memorandum of Law in Support of request for Confidentiality

A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau.

The bedrock provision on the management of confidential information filed before this Energy Bureau is Section 6.15 of Act 57-2014, known as the "Puerto Rico Energy Transformation and Relief Act." It provides, in pertinent part, that: "[i]f any person who is required to submit information to the Energy Commission believes that the information to be submitted has any confidentiality privilege, such person may request the Commission to treat such information as such" 22 LPRA § 1054n. If after appropriate evaluation the Energy Bureau determines that the information should be protected, "it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* § 1054n(a).

The confidential information shall be provided "only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement." *Id.* § 1054n(b). Finally, Act 57-2014 provides that this Energy Bureau "shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However,

the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review.” *Id.* § 1054n(c).

Relatedly, in connection with the duties of electric power service companies, Section 1.10(i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information under the Rules of Evidence of Puerto Rico.

Moreover, the Energy Bureau’s Policy on Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ¶ 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.* at ¶ 6.

The Energy Bureau policy on CEII is regulated by Section D of the Resolution issued on August 31, 2016, in Case No. CEPR-MI-2016-0009. Section D establishes that CEII is Validated Confidential Information and only authorized representatives may review such information:

2. Critical Energy Infrastructure Information (“CEII”)

The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties’ authorized representatives only after they have executed and delivered the Nondisclosure Agreement.

Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

Id. at § D (on Access to Validated Confidential Information).

Further on, Energy Bureau Regulation No. 8543, includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that:

[A] person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to . . . Article 6.15 of Act No. 57-2015, as amended.

Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings* § 1.15; *see also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms* § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

B. Request for Confidentiality of the Pictures included in the Nineteenth Update

The Nineteenth Update contains pictures that identify or depict CEII that, under relevant federal law and regulations, is protected from public disclosure. LUMA stresses that the pictures which LUMA redacted from the public version of the Nineteenth Report warrant confidential treatment to protect the Puerto Rico Energy Transmission and Distribution System (“T&D System”) from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico.

Generally, CEII or critical infrastructure information is exempted from public disclosure because it involves assets and information which pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly 18 C.F.R. § 388.113, states that:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
- (iv) Does not simply give the general location of the critical infrastructure.

Id. at § 388.113(2).

Additionally, Section 388.113(3) defines critical electric infrastructure as a “system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters.” *Id.* § 388.113(3). Finally, “[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.” *Id.* § 388.113(4).

The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674, part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”).² CII is defined

² Regarding the protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part that CII:

- (A) shall be exempt from disclosure under the Freedom of Information Act;
- (B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision making official;
- (C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;

as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems” 6 U.S.C. § 671(3).³

As mentioned above, the Energy Bureau’s Policy on Confidential Information provides for the management of CEII. In several proceedings, this Energy Bureau has considered and granted requests to submit CEII under seal of confidentiality.⁴ For example, in at least two proceedings on

-
- (D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
 - (i) in furtherance of an investigation or the prosecution of a criminal act; or
 - (ii) when disclosure of the information would be--
 - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
 - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office
 - (E) shall not, be provided to a State or local government or government agency; of information or records;
 - (i) be made available pursuant to any State or local law requiring disclosure of information or records;
 - (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or
 - (iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.
 - (F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

³ CII includes the following types of information:

- (A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;
- (B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or
- (C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

⁴ See e.g., *In re Review of LUMA’s System Operation Principles*, NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority’s System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA’s Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan*, NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrad Transmission and Distribution Investments*, NEPR-MI

Data Security,⁵ and Physical Security,⁶ this Energy Bureau, *sua sponte*, conducted proceedings confidentially, recognizing the need to protect CEII from public disclosure.

Additionally, this Energy Bureau has granted requests by LUMA to protect CEII in connection with LUMA's System Operation Principles. *See* Resolution and Order of May 3, 2021, table 2 on page 4, Case No. NEPR-MI-2021-0001 (granting protection to CEII included in LUMA's Responses to Requests for Information). Similarly, this Energy Bureau granted confidential designation to several portions of LUMA's Initial Budgets and Responses to Requests for Information in the proceedings on LUMA's proposed Initial Budgets and System Remediation Plan.⁷

On June 30, 2023, this Energy Bureau issued a Resolution and Order granting LUMA's previous requests for confidential treatment of confidential portions of LUMA's Updates to the Stabilization Plan. Also, on July 12, 2023, this Energy Bureau issued a Resolution and Order granting LUMA's requests for confidential treatment of confidential portions of LUMA's Sixteenth Update on Stabilization Plan filed on July 3, 2023. The Energy Bureau should apply those rulings to this filing and protect the pictures in the Nineteenth Update. The pictures depict the exact location, specifications and characteristics of the gensets and other large capacity

2020-0016 (where PREPA filed documents under the seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019, granting confidential designation and PREPA's request that included trade secrets and CEII); *but see* Resolution and Order of February 12, 2021 (reversing in part, grant of confidential designation).

⁵ *In re Review of the Puerto Rico Electric Power Authority Data Security Plan*, NEPR-MI-2020-0017.

⁶ *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

⁷ *See* Resolution and Order of April 22, 2021, on Initial Budgets, table 2 on pages 3-4 and Resolution and Order of April 22, 2021, on Responses to Requests for Information, table 2 at pages 8-10, Case No. NEPR-MI-2021-0004; Resolution and Order of April 23, 2021, on Confidential Designation of Portions of LUMA's System Remediation Plan, table 2 on page 5, and Resolution and Order of May 6, 2021, on Confidential Designation of Portions of LUMA's Responses to Requests for Information on System Remediation Plan, table 2 at pages 7-9, Case No. NEPR-MI-2020-0019.

equipment assembled and installed at Palo Seco, as well as pictures of the San Juan site. Thus, the pictures could be useful to a person planning an attack on the transmission and distribution facilities, as they enable a person to identify their location and provide clear depictions of the equipment which could compromise the electric power services in Puerto Rico.

LUMA respectfully submits that the pictures in the Nineteenth Update should be designated CEII. This designation is a reasonable and necessary measure to protect critical infrastructure and enable LUMA to leverage the information and assessment of critical infrastructures without external threats. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that the pictures be maintained confidential to safeguard the facility's integrity and protect it from external threats.

C. Identification of Confidential Information.

In compliance with the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, below is a table summarizing the hallmarks of this request for confidential treatment.

| | Document or file | Pages in which Confidential Information is Found, if applicable | Summary of Legal Basis for Confidentiality Protection, if applicable | Date Filed |
|---|-----------------------------------------------------|------------------------------------------------------------------------|--------------------------------------------------------------------------------------|-------------------|
| 1 | Generation Stabilization Plan dated August 15, 2023 | Pictures on pages 4, 10 and 11 of Exhibit 1. | Critical Energy Infrastructure Information 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674. | August 15, 2023 |

WHEREFORE, LUMA respectfully requests that this Energy Bureau **take notice** of the aforementioned, **accept** the Nineteenth Update submitted as *Exhibit 1* to this Motion, **deem** that

LUMA complied with that portion of the October 12th Order that requires submission of bi-monthly updated reports on the Stabilization Plan, and **grant** the request for confidential treatment that is included in this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of August 2023

I hereby certify that this motion was filed using the electronic filing system of this Energy Bureau. I also certify that copy of this motion will be notified to the Puerto Rico Electric Power Authority, through its attorney of record: jmarrero@diazvaz.law.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9107
Fax 939-697-6147

/s/ Ana Margarita Rodríguez Rivera
Ana Margarita Rodríguez Rivera
RUA Núm. 16195
ana.rodriguez@us.dlapiper.com

/s/ Valeria Belvis Aquino
Valeria Belvis Aquino
RUA NÚM. 22584
valeria.belvis@us.dlapiper.com

Exhibit 1
Nineteenth Update on Stabilization Report



Generation Stabilization Plan Discussion

August 15, 2023

Agenda

- I. Executive Summary
- II. Construction Progress Brief
- III. Current Operations / Resource Adequacy
- IV. Construction Picture Archive

Executive Summary

San Juan Site (200 MW):

- **Emphasis remains on construction and commissioning**
 - Target date for completing commissioning of ten San Juan gensets remains mid-September
 - Significant progress is being made on the major construction tasks:
 - **Natural gas and diesel pipelines** – pre-fabrication is complete
 - **115 kV transmission line** – all power poles erected, and transmission cabling being pulled between poles
 - **300 MVA transformer** – Low-voltage cable structures completed 8/11; LUMA commissioning expected to be complete 8/15, and high-voltage cable structure construction begins 8/15 since needed equipment arrived on 8/14.
 - **First fire generation (genset) testing** – 9 of 10 gensets have completed the first-fire test on natural gas and first fire on diesel fuel is scheduled to begin 8/15

Palo Seco Site (150 MW):

- **Operations continuing – Punchlist items being addressed, and normal O&M activities performed**



Construction Progress Brief – San Juan site

| Construction Progress Summary - updated 8/14/23 | | | |
|-------------------------------------------------|---------------|-----------------|------------|
| Work Area | Total (units) | Installed Units | % Complete |
| Diesel Supply Line (ft) | 2500 | 2500 | 100% |
| Gas Supply Line (ft) | 2775 | 2775 | 100% |
| Cable Tray (ft) | 7250 | 5900 | 81% |
| Pipe Rack (Sections) | 20 | 20 | 100% |
| Genset Grounding (lot) | 10 | 10 | 100% |
| Genset cables to switchgear (lot) | 180 | 155 | 86% |
| BOP Wiring (lot) | 4 | 4 | 100% |
| 115 Kv transmission poles (lot) | 7 | 7 | 100% |

- New 115 Kv transmission line

- All power poles are installed
- Power cable is being strung between poles

- 300 MVA transformer

- Leak testing and oil fill completed
- Commissioning and the installation of cable support structures continue

- Demin water system

- Piping and pump skids on site; remaining materials in customs with delivery planned to be on site 8/16.
- Foundation for pump skids are complete.
- Pipe Support foundation are in progress.
- Tie in for Demin Water Supply System expected 8/17

- Fuel pipe construction

- **Natural gas:** pipe pre-fab completed; pressure testing and pipe cleaning advancing.
- **Diesel piping:** complete with connection to fuel pump skids

REDACTED

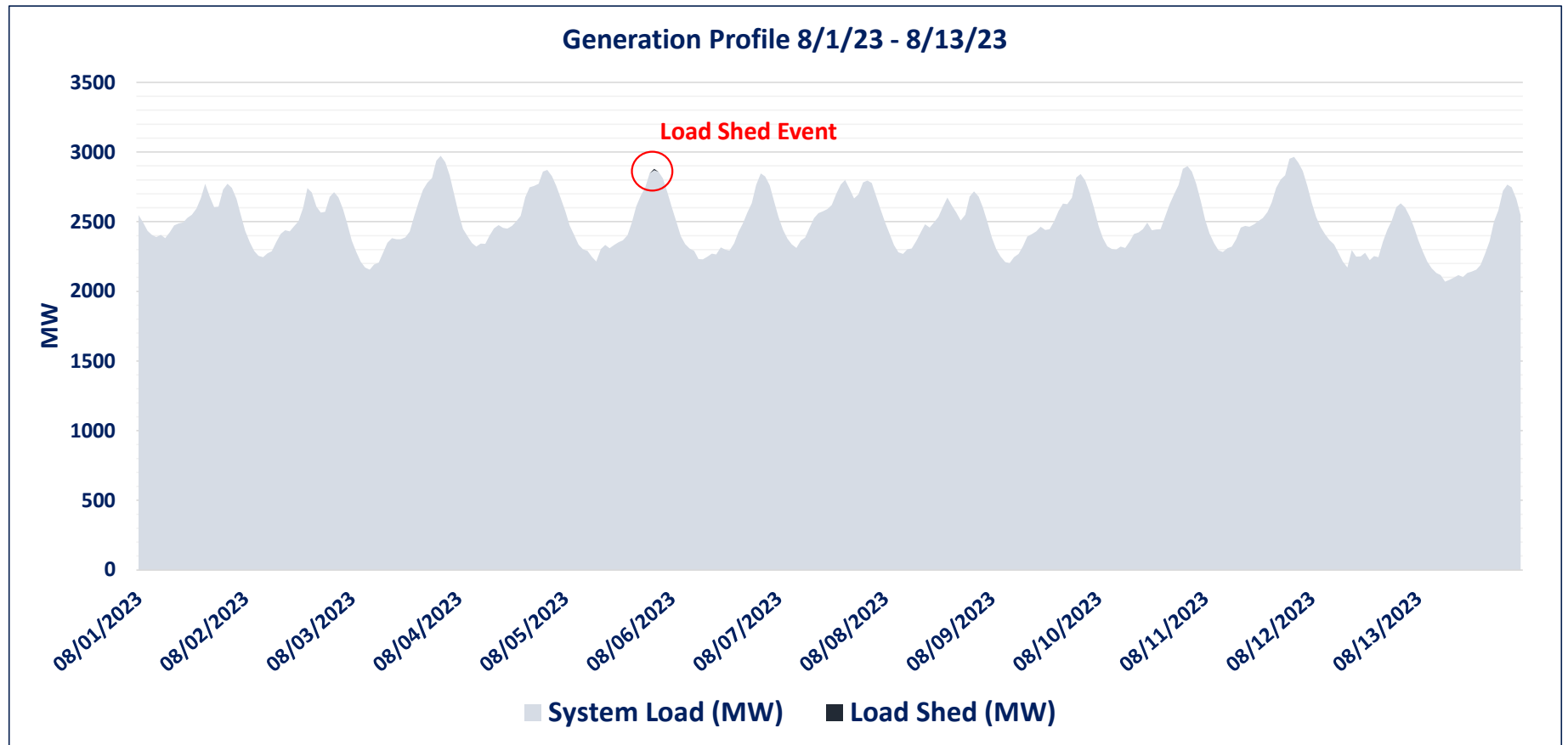
REDACTED

REDACTED

REDACTED



Month-to-Date Load Performance

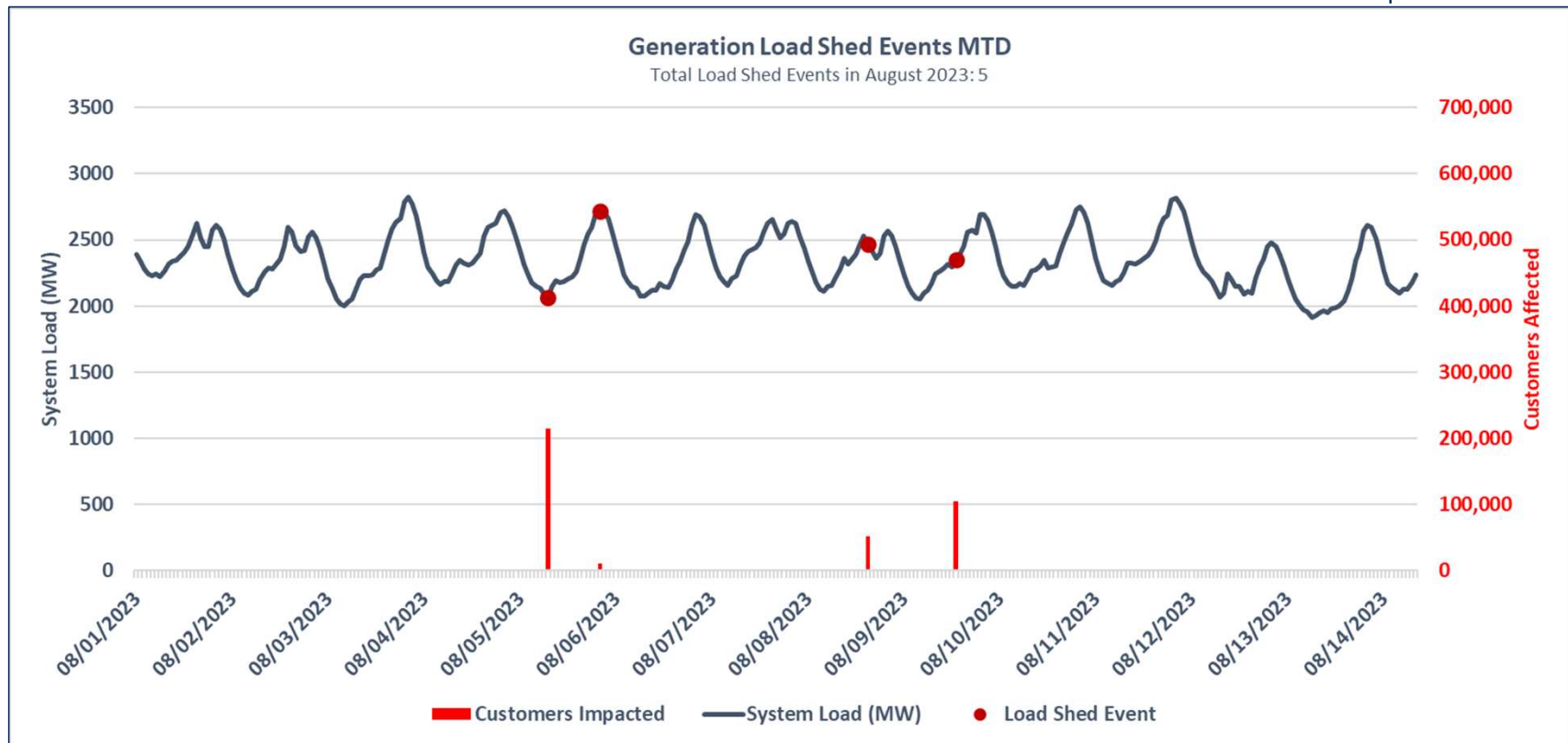


- So far this month, one load shed event due to generation shortfall has occurred, as shown in the graph.
- Other four load shed events have occurred due to unit trips (shown in a following slide).



Month-to-Date Generation Load Shed Events: 20% of events this month have been due to generation shortfall

Updated until 8/13/2023

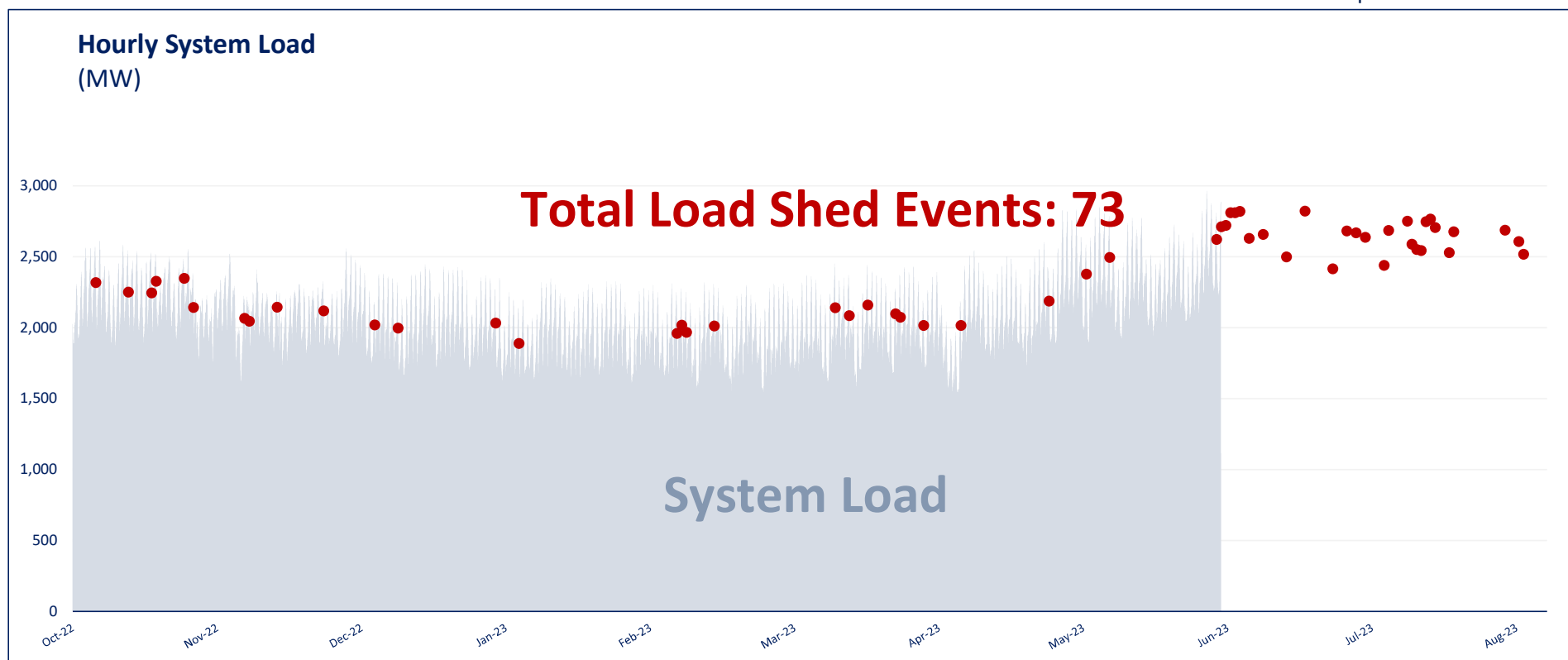


| MTD (August 1, 2023 - August 13, 2023) | Total Events | Average Clients Affected | Average Duration (min) |
|-------------------------------------------|--------------|-----------------------------|---------------------------|
| Generation Shortfall Events | 1 | 10,761 | 33 |
| Unit Performance Load Shed Events | 4 | 92,802 | 13 |

- On 8/5/2023, there were 2 Load Shed Events at approximately 7am, which the graph illustrates with one dot
- The next slide displays Load Shed totals since October 1, 2022

Current Generation Load Shed Events: 73 load shed events have occurred since October 1, 2022

Updated until 8/13/2023

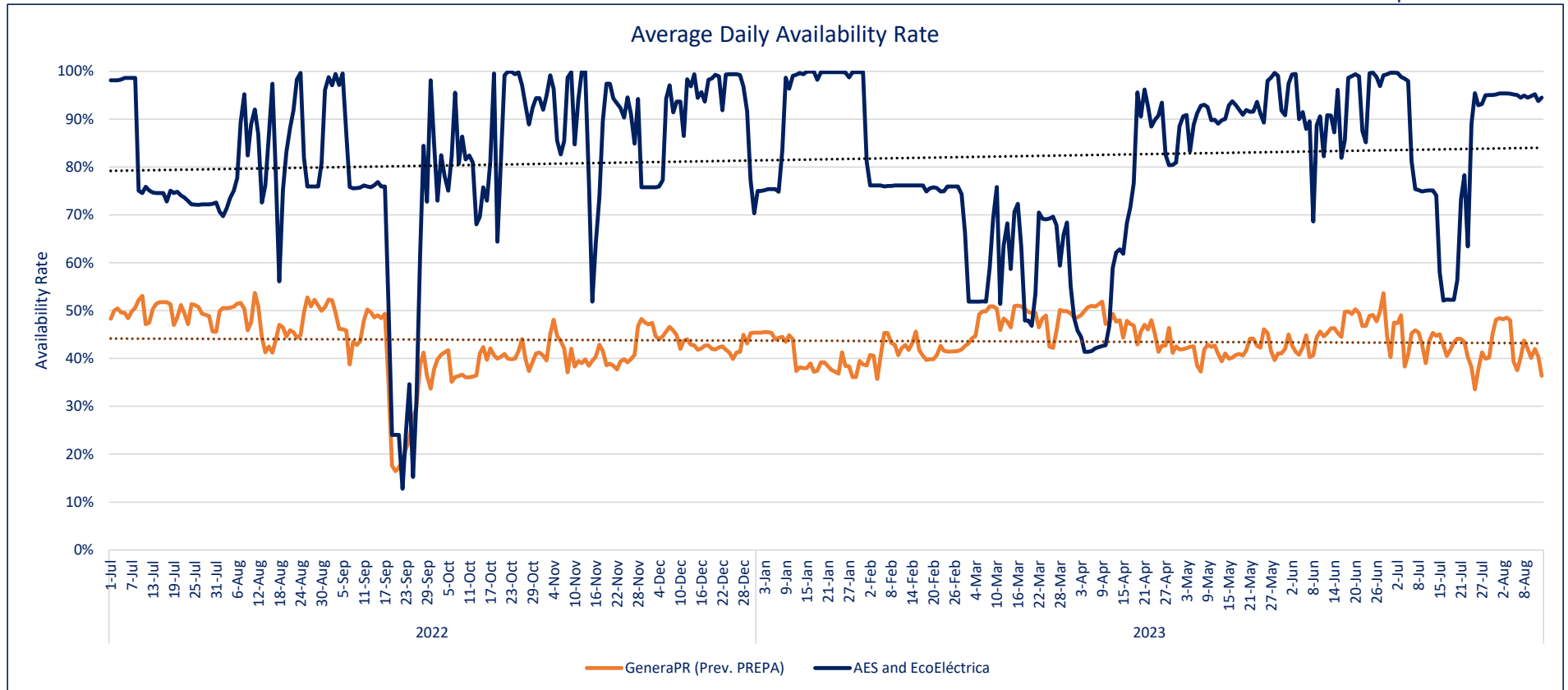


| YTD (January 1, 2023 - August 13, 2023) | Total Events | Average Clients Affected | Average Duration (min) |
|--------------------------------------------|--------------|-----------------------------|---------------------------|
| Generation Shortfall Events | 16 | 98,981 | 188 |
| Unit Performance Load Shed Events | 41 | 101,172 | 14 |

| 2022 Post-Fiona (October 1, 2022 - December 31, 2022) | Total Events | Average Clients Affected | Average Duration (min) |
|----------------------------------------------------------|--------------|-----------------------------|---------------------------|
| Generation Shortfall Events | 4 | 139,049 | 309 |
| Unit Performance Load Shed Events | 12 | 117,046 | 44 |

Average Daily Availability

Updated 8/13/2023

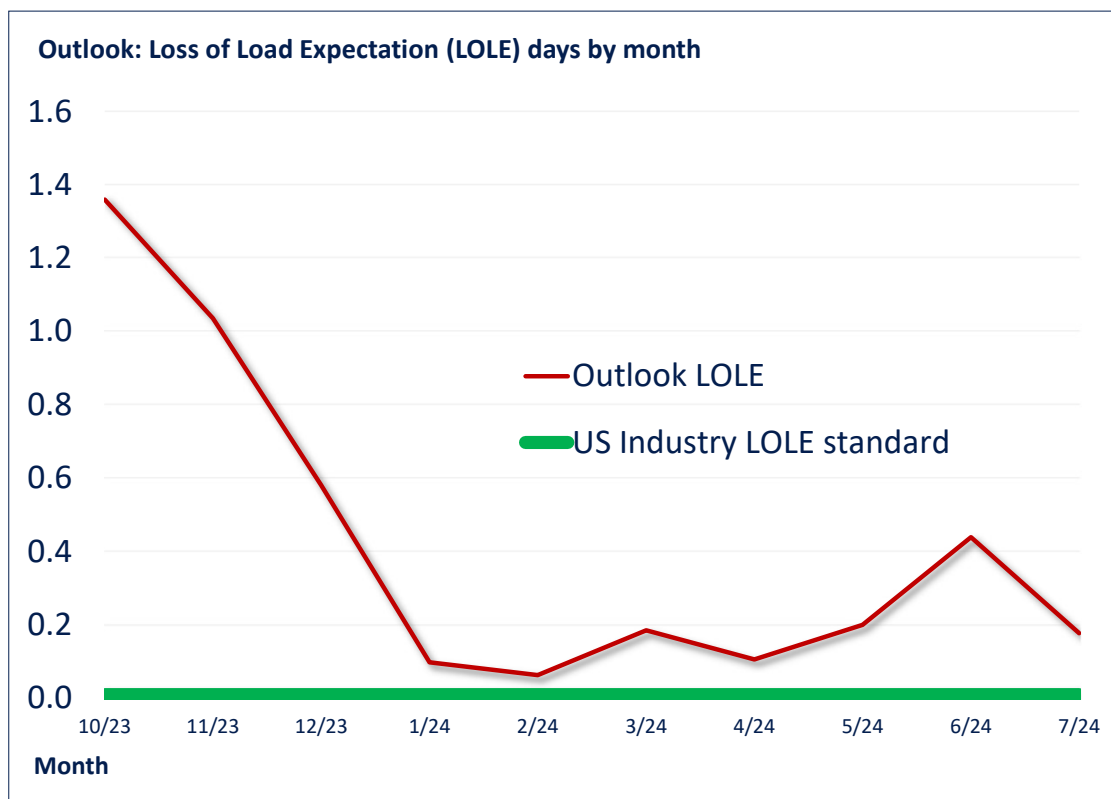


Note: The linear trendlines (dotted straight lines on the graph) smooth-out fluctuations in data to show a pattern or trend more clearly. It uses the average value as a single point in the trendline.

- This month the PREPA fleet experienced multiple unit forced outages which have been a contributing factor for the load sheds events.



350 MW of emergency generation at Palo Seco and San Juan improves LOLE, but risk remains much higher than US industry standard



- Emergency generation helps lower our LOLE Outlook to an annual run-rate* of 50.4. While this is a big improvement from our current 69.6 days/year, it's still **504x** greater than the US Industry LOLE standard of **0.1 days/year**.

*Average from 10/23 to 7/24
Analysis Date: 8/9/2023



Picture Archive San Juan site

> 300 MVA transformer and
support structure for low
voltage interconnection
being constructed - 8/9/23

REDACTED

REDACTED

REDACTED

^ 115kV Cabling being installed between
poles 1 and 2 - 8/9/23

REDACTED

REDACTED

^ 115kV Cabling being installed
between poles 6 and 7 - 8/9/23

< Cable being installed in
cable trays - 8/9/23

^ Cable trays being installed on top of "pipe Bridges"- 8/9/23



Picture Archive
San Juan site

REDACTED

^ Genset "hot section" repair with replacement part in shipping box-
8/11/23

REDACTED

< Wiring from gensets
to Automatic Transfer
Switch's transformers
and switch yard
- 8/5/23

REDACTED

^ Installation of conduits inside and outside of the Sub Station Control Room- 8/11/23

> Support structure being
constructed for low-voltage
side of 300 MVA transformer
- 8/11/23

REDACTED





LUMA

Thank you!