

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

**NEPR**

**Received:**

**Sep 1, 2023**

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IN RE:  
LUMA'S RESPONSE TO HURRICANE  
FIONA

**CASE NO. NEPR-MI-2022-0003**

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

**MOTION SUBMITTING TWENTIETH 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 Twentieth Update on Stabilization Plan for Temporary  
Emergency Generation Capacity**

1. In a Resolution and Order of October 7, 2022 ("October 7<sup>th</sup> 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 7<sup>th</sup> 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."<sup>1</sup>

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<sup>1</sup> 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 12<sup>th</sup> Order”).

3. Per the October 12<sup>th</sup> Order, LUMA was directed to submit the 1<sup>st</sup> and the 15<sup>th</sup> 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 31<sup>st</sup>, 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 27<sup>th</sup> 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 15<sup>th</sup>, 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 1<sup>st</sup>, 2022, LUMA submitted the Third Update on the Stabilization Plan.

9. The most recent updates to the Stabilization Plan were filed on December 1<sup>st</sup>, 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 15<sup>th</sup> (Ninth Update); April 3<sup>rd</sup> (Tenth Update); April 17<sup>th</sup> (Eleventh Update); May 1, 2023 (Twelfth Update); May 15, 2023 (Thirteenth Update); June 1<sup>st</sup>, 2023 (Fourteenth Update); June 15, 2023 (Fifteenth Update); July 3<sup>rd</sup>, 2023 (Sixteenth Update); July 17<sup>th</sup>, 2023 (Seventeenth Update); August 1<sup>st</sup>, 2023 (Eighteenth Update), and August 15<sup>th</sup>, 2023 (Nineteenth Update).

10. In compliance with the October 12<sup>th</sup> Order, LUMA hereby submits as *Exhibit 1*, the Twentieth Update on the Stabilization Plan (“Twentieth Update”). The Twentieth Update includes, among others, a summary of the status of the Stabilization Plan, the status of construction activities at the San Juan site and 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 20<sup>th</sup> 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 Twentieth 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 Twentieth Update**

The Twentieth 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 Twentieth 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”).<sup>2</sup> CII is defined

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<sup>2</sup> 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;
- (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--

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).<sup>3</sup>

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.<sup>4</sup> For example, in at least two proceedings on

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(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.

<sup>3</sup> 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.

<sup>4</sup> 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 Minigrid Transmission and Distribution Investments*, NEPR-MI 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).



Data Security,<sup>5</sup> and Physical Security,<sup>6</sup> 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.<sup>7</sup>

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 Twentieth Update. The pictures depict the exact location, specifications and characteristics of the gensets and other large capacity 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

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

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

<sup>7</sup> *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.

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 Twentieth 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 September 1, 2023	Pictures on pages 4, 5, 11 and 12 of Exhibit 1.	Critical Energy Infrastructure Information 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	September 1, 2023

**WHEREFORE**, LUMA respectfully requests that this Energy Bureau **take notice** of the aforementioned, **accept** the Twentieth 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 1<sup>st</sup> day of September 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](mailto:jmarrero@diazvaz.law).



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*Exhibit 1*  
*Twentieth Update on Stabilization Report*



# Generation Stabilization Plan Discussion

September 1, 2023

# Safety Success

August 25, 2023  
Construction crews were invited to join a  
Safety Performance Recognition Lunch  
for successfully completing over 100,000 work-hours without  
an injury on this project



# 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 to meet September in service**
  - Current schedule of 9/23 (with potential for earlier date)
  - Contractors added a “swing shift” of labor to push the construction schedule and make-up for weather delays
- **Construction Summary - percentage complete by topic:** Updated: 08/31
  - **Power Generation Equipment:** 99%
  - **115 kV transmission line:** 77%
  - **300 MVA transformer:** 100%
  - **Demineralized Water:** 84%
  - **Final Power System Commissioning:** 41%

## Palo Seco Site (150 MW):

- **Operations continuing and normal O&M activities being performed**

REDACTED

San Juan construction site, work crew pulling cable over a pipe bridge – 8/23





## Construction Progress Brief – San Juan site

Construction Work Area - Progress as of 8/29			
Work Area	Total (Qty)	Installed	% of Completion
Cable Tray	7250 (ft)	7250	100%
MV Cable	90	90	100%
Control Cables	30	30	100%
CT Cables	15	15	100%
MV Cable Terminations	180	85	47%

- **Electrical wiring is a major focus**

- Control and communication cables are being installed
- Connecting heavy 750 MCM cables between gensets and switchgear

- **Demineralized water**

- All equipment and materials on site
- Skid piping & control wiring in process
- Presently tying into raw water supply

- **New 115 Kv transmission line**

- All power poles & cable installed
- Custom copper buss bars are being machined on site to enable interconnections

- **300 MVA transformer**

- LUMA has completed testing
- High voltage gantry structure for cable connection to switchyard being erected

- **Fuel pipe construction**

- Natural gas and diesel piping in operation.
- All gensets have been successfully first-fired with natural gas and diesel

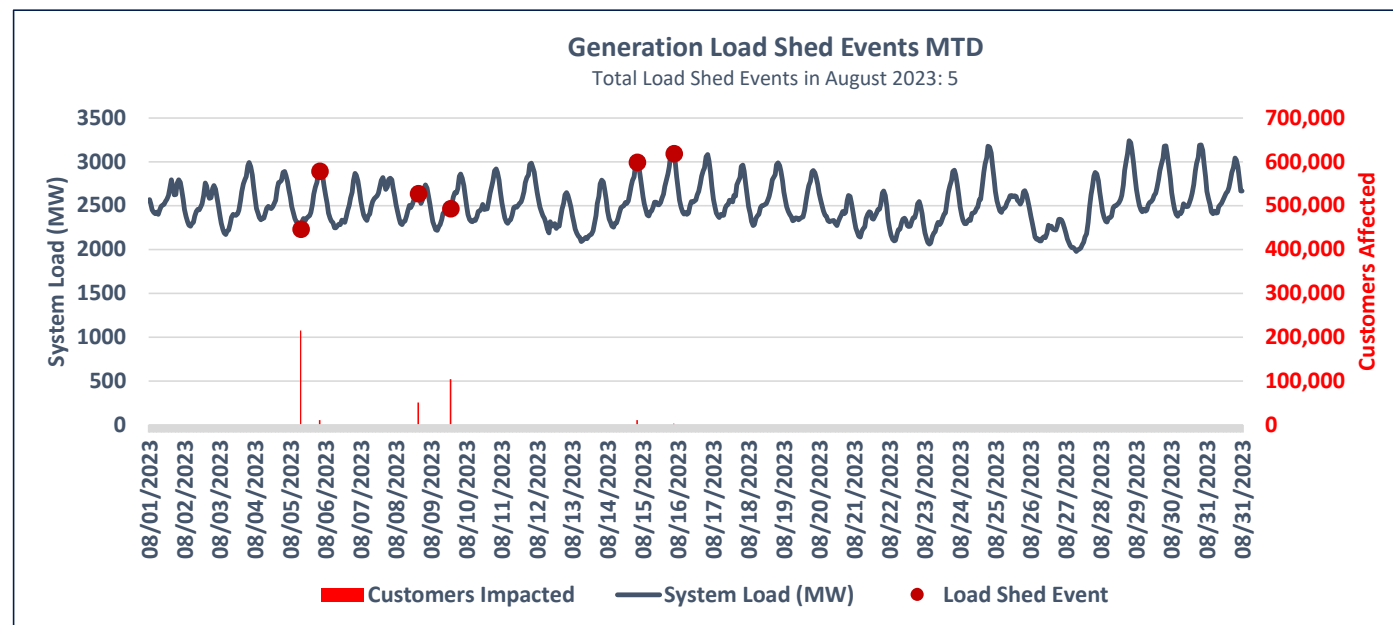
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## Month-to-Date Generation Load Shed Events: 3 of 7 events this month have been due to generation shortfall

Updated until 8/31/2023



- 150 MW Emergency Generation at Palo Seco has reduced load shed events and their impact
- Without this generation, events in August would have been longer, impacting more customers
- On August 28, 2023, a new peak demand record for this year was reached at 3,254 MW.

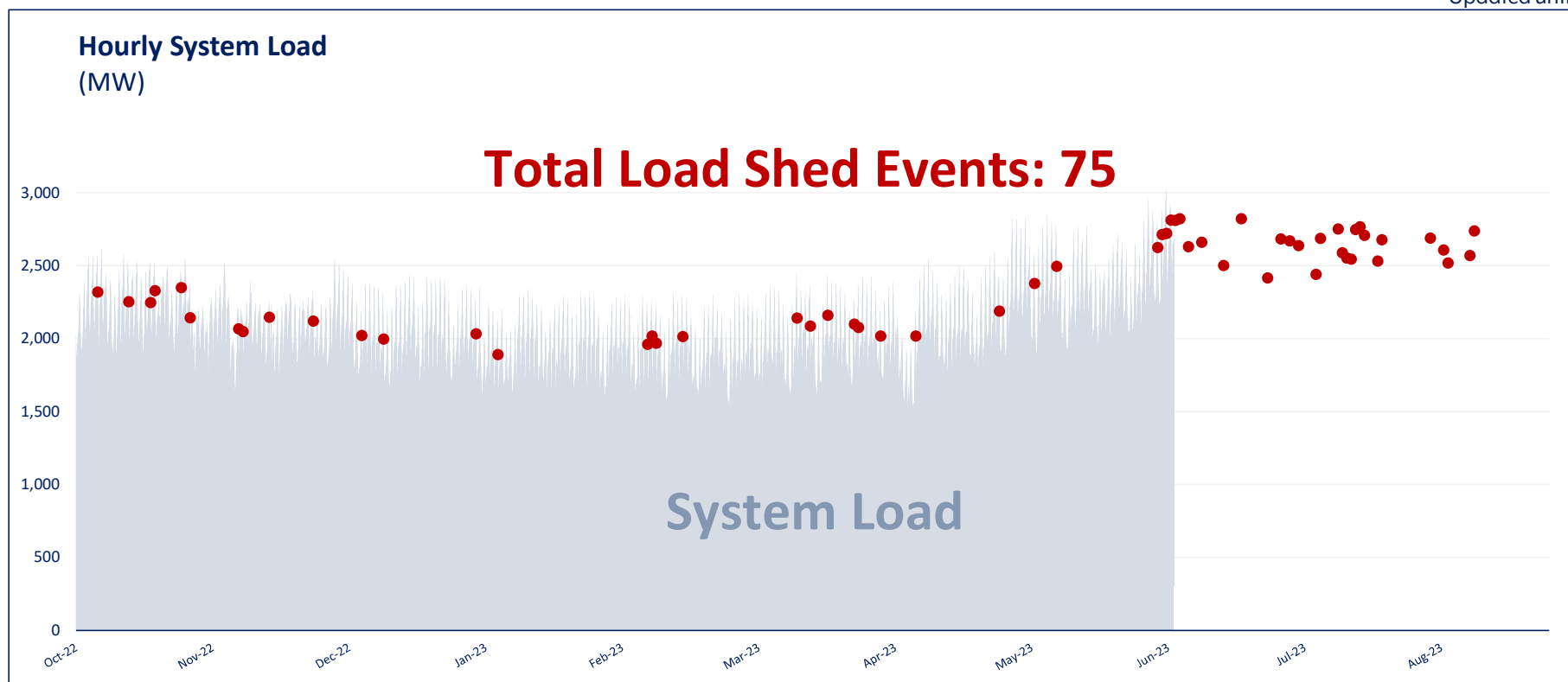
MTD (August 1, 2023 - August 31, 2023)	Total Events	Average Clients Affected	Average Duration (min)
Generation Shortfall Events	3	8,166	35
Unit Performance Load Shed Events	4	92,802	13

- On 8/5/2023, there were 2 Load Shed Events at approximately 7am, which the graph illustrates with one dot
- Customers affected on 8/15/2023 event were about 2,000, that's why they are not appreciated in the graph



# Current Generation: 75 load shed events have occurred since October 1, 2022

Updated until 8/31/2023

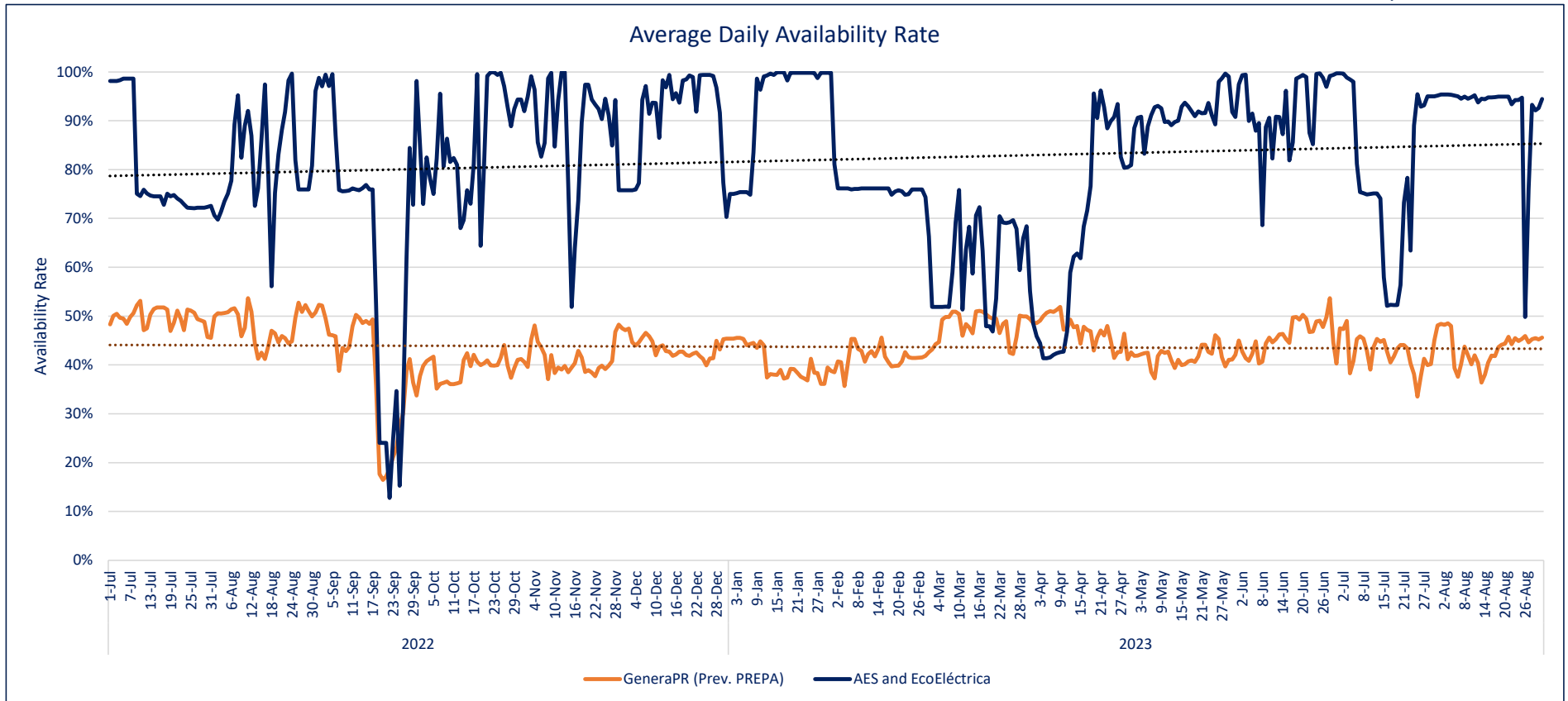


Year to Date (January 1, 2023 - August 31, 2023)	Total Events	Average Customers Affected	Average Duration (min)
Generation Shortfall Events	18	88,746	171
Unit Performance Load Shed Events	41	101,172	14

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

# Average Daily Availability

Updated 8/31/2023

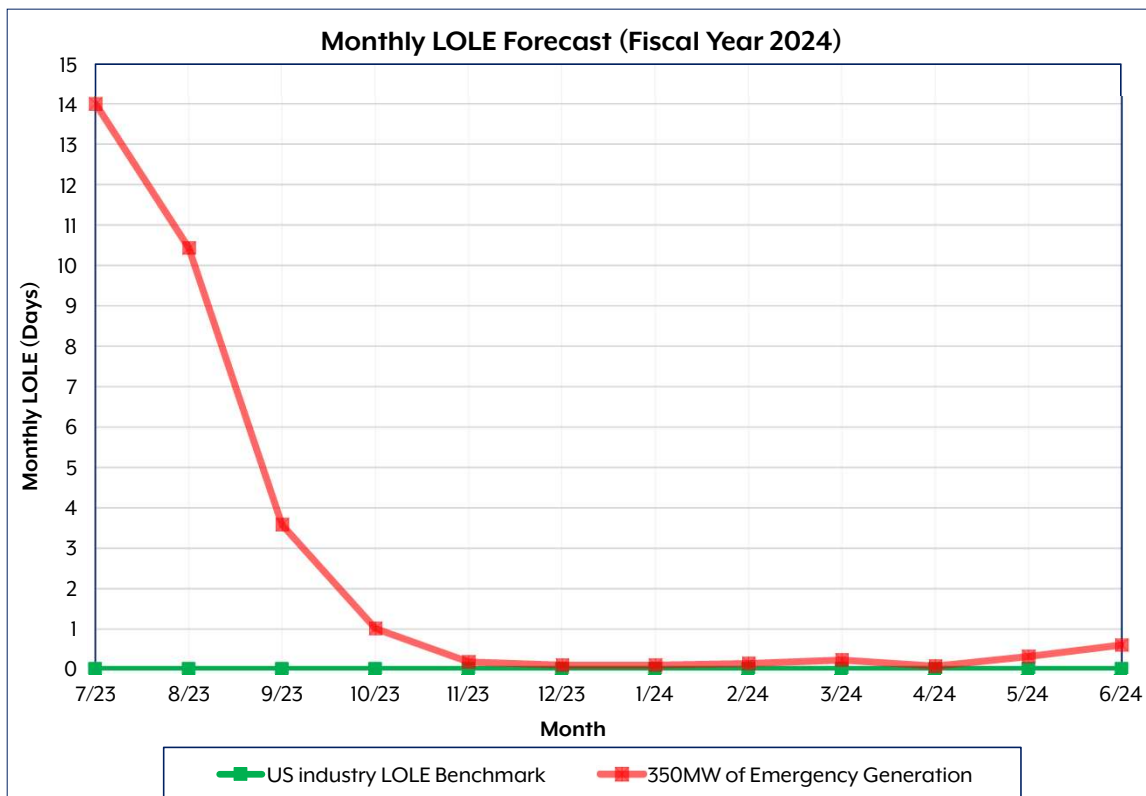


**Note:** The linear trendlines (dotted straight lines on the graph) smooth-out fluctuations in data to show a pattern or trend more clearly.

- This month multiple unit forced outages were a contributing factor for the load sheds events.

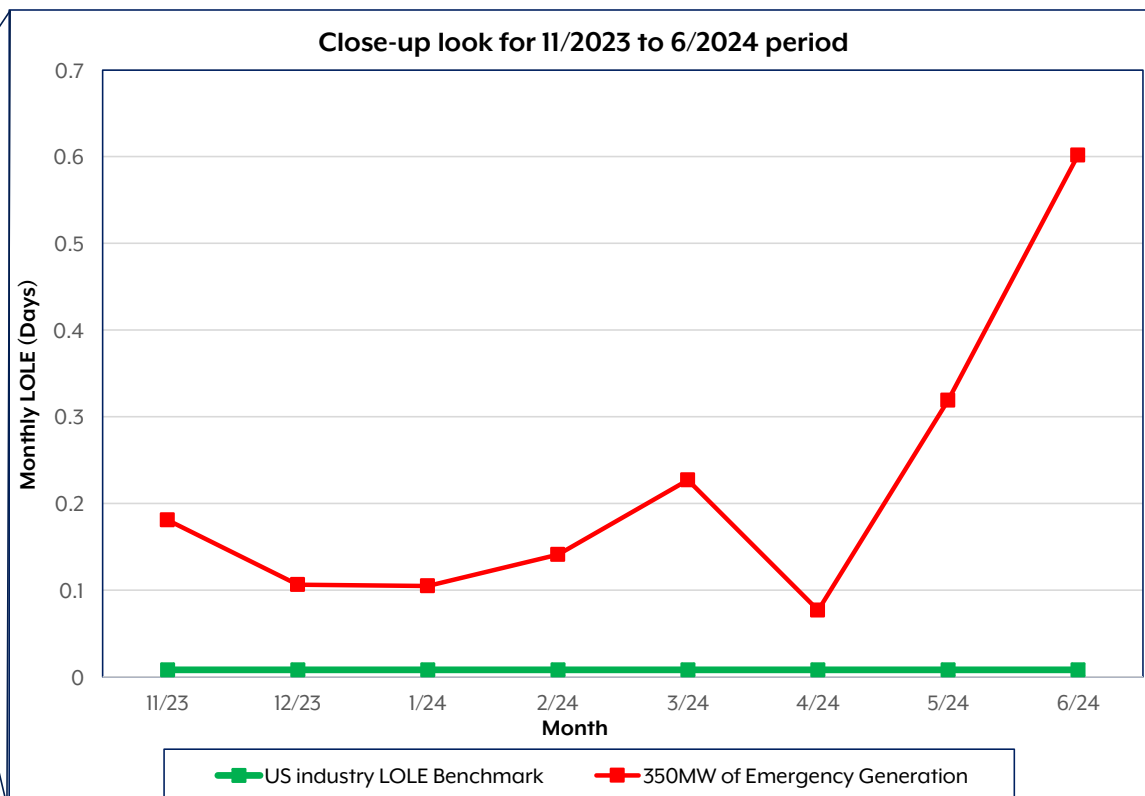
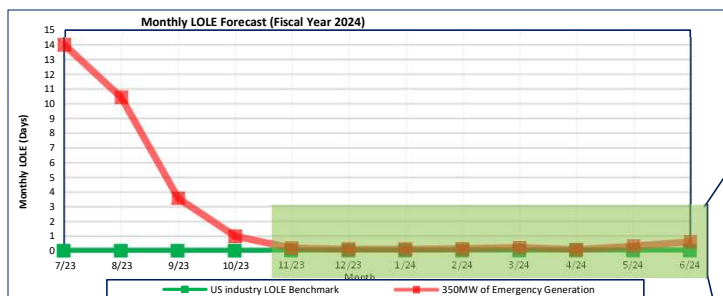


## 350 MW of emergency generation will help reduce risk of LOLE considerably in the next several months....



- Forecasted LOLE Days (from 7/1/2023 to 6/30/2024) with 350 MW of Emergency Generation: **30.8** days.
- The 350 MW of Emergency Generation includes the 150 MW currently online at Palo Seco + 200 MW at San Juan that are expected to be online by September 23.

..... however, the LOLE risk next summer is still approximately 70 times US industry average



- Monthly LOLE spikes as high as 0.6 next summer compared to .0083 national average. <sup>(1)</sup>
- Monthly LOLE would be approximately 70 times national average  $[0.6/.0083]$ .

(1) 0.1 annual LOLE is approximately .0083 on a monthly basis

## Picture Archive San Juan site

> Control Cable and  
SCADA wiring  
Termination in  
Substation Control  
Room - 8/24/23

REDACTED

> High voltage  
gantry structure  
near the 300MVA  
transformer is  
almost complete -  
8/24/23

REDACTED

REDACTED

^ Demineralization Water System in place at San Juan - 8/25/23

REDACTED

< Demineralized water  
piping connecting to  
skids - 8/24/23



Picture Archive  
San Juan site

REDACTED

^ Heavy 750 MCM cable installed on the “waterfall” cable tray that holds the cable from grade up to the top of the pipe bridge - 8/24/23

^ Crew on top of the pipe bridge structure pulling 750 MCM cable up the “waterfall” cable tray to the level cable tray attached to the pipe bridge - 8/24/23

^ Demineralized water piping and interconnections in progress - 8/24/23



9/1/2023





# LUMA

Thank you!