

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

**NEPR**

**Received:**

**Sep 1, 2023**

**6:09 PM**

**IN RE:**

REVIEW OF LUMA'S INITIAL BUDGET

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

**SUBJECT:** Motion to Submit Monthly Maintenance Report for August 2023, in Compliance with Resolution and Order dated June 25, 2023

**MOTION TO SUBMIT MONTHLY MAINTENANCE REPORT FOR AUGUST 2023, IN  
COMPLIANCE WITH RESOLUTION AND ORDER DATED JUNE 25, 2023**

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

**COMES NOW GENERA PR LLC** ("Genera"), as agent of the Puerto Rico Electric Power Authority ("PREPA"),<sup>1</sup> through its counsel of record, and respectfully state and request the following:

1. On June 25, 2023, the Energy Bureau of the Puerto Rico Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Determination on the FY24 Annual Budgets for the Electric Utility System – LUMA, Genera, and PREPA* (the "June 25<sup>th</sup> Order"), through which it (1) modified the Proposed Consolidated Fiscal Year 2024 Budget submitted by LUMA; (2) approved the modified budgets subject to compliance with various orders included in the June 25<sup>th</sup> Order; and (3) included a series of determinations and orders addressed to Genera regarding the GenCo Budget.<sup>2</sup>

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<sup>1</sup> Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* ("LGA OMA"), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

<sup>2</sup> See June 25<sup>th</sup> Order, pp. 16 - 21.

2. As part of its stringent reporting requirements to ensure that the approved repair work is on schedule and effectively utilizes the capacity enabled by the temporary emergency generation, the Energy Bureau ordered Genera to:

Using the model template in Attachment J using the Aguirre Power Plant as an example, submit monthly reports that show the status of the repairs and maintenance activities planned and underway – Genera may propose modifications to the Reporting Template in Attachment J, however the first monthly report is due on August 1, 2023.<sup>3</sup>

3. On August 1, 2023, in compliance with the June 25<sup>th</sup> Order, Genera filed a document titled *Motion to Submit Critical Replacement Program and Monthly Maintenance Report in Compliance with Resolution and Order Dated June 25, 2023* (“August 1<sup>st</sup> Motion”), whereby it submitted its initial monthly maintenance report titled *GENERA Project Master Tracker* (the “Project Master Tracker”),<sup>4</sup> which detailed the status of the repair and maintenance activities for July 2023.

4. In the August 1<sup>st</sup> Motion, Genera further proposed a revision to Attachment J of the June 25<sup>th</sup> Order and requested approval from the Energy Bureau for Genera to submit its subsequent monthly reports using the provided revised format. Genera is still awaiting a determination from the Energy Bureau on this matter.

5. Notwithstanding, in compliance with the June 25<sup>th</sup> Order and in accordance with the August 1<sup>st</sup> Motion, Genera hereby submits, as *Exhibit A* to this Motion, Genera’s report on the status of the repairs and maintenance activities planned and underway for August 2023.

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<sup>3</sup> *Id.* p. 18.

<sup>4</sup> The Project Master Tracker provides a comprehensive list of activities contains a rundown of all the activities that have been planned or are underway, as well as those that have already been completed by Genera, and aligns with the model template provided in Attachment J of the June 25<sup>th</sup> Order.

6. Moreover, Genera respectfully requests the Energy Bureau to amend the existing deadline for submitting monthly reports. Currently, the ordered deadline is the first (1<sup>st</sup>) of each month, as outlined in the June 25<sup>th</sup> Order. Genera proposes to adjust this submission deadline to within twenty (20) days after the end of the monthly reporting period. Thus, Genera will produce a report that will capture an entire month's report and present it to the Energy Bureau within twenty (20) days after the end of the monthly reporting period. This modification in the schedule will better align with Genera's internal reporting mechanisms and facilitate more meticulous data preparation, enhancing the quality of the reports submitted in compliance with the Bureau's guidelines.

7. Furthermore, Genera respectfully requests that the modification in the filing schedule be extended to the following June 25<sup>th</sup> Order required reports:

- a. the Implementation of Grid Modernization Plan to within twenty (20) days after the end of the bi-monthly reporting period;
- b. the Permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan to within twenty (20) days after the end of the monthly reporting period; and
- c. the Budget to Actuals Reporting to within forty-five (45) days after the end of the quarterly reporting period.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **approve** the proposed change of dates to submit the reports from the first (1<sup>st</sup>) of each month to within twenty (20) days after the end of the reporting period for monthly and bi-monthly reports and to within forty-five (45) days after the end of the reporting period for quarterly reports; and **deem** that Genera has complied with the June 25<sup>th</sup> Order as it pertains to the matter of the report on the status of the repairs and maintenance activities.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 1<sup>st</sup> day of September 2023.

**ECIJA SBGB**

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/s/ Alejandro López-Rodríguez

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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 an electronic copy of this motion will be sent 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) promptly after such filing.

In San Juan, Puerto Rico, this 1<sup>st</sup> day of September 2023.

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez






















Exhibit A

Status and Maintenance Report for August 2023



Project: GENERA Projects Maste Date: Fri 9/1/23	Task		Summary		Inactive Milestone		Duration-only		Start-only		External Milestone		Critical Split	
	Split		Project Summary		Inactive Summary		Manual Summary Rollup		Finish-only		Deadline		Progress	
	Milestone		Inactive Task		Manual Task		Manual Summary		External Tasks		Critical		Manual Progress	



Project: GENERA Projects Maste Date: Fri 9/1/23	Task		Summary		Inactive Milestone		Duration-only		Start-only		External Milestone		Critical Split	
	Split		Project Summary		Inactive Summary		Manual Summary Rollup		Finish-only		Deadline		Progress	
	Milestone		Inactive Task		Manual Task		Manual Summary		External Tasks		Critical		Manual Progress	
Page 2														





Project: GENERA Projects Maste

Date: Fri 9/1/23

Task		Summary		Inactive Milestone		Duration-only		Start-only		External Milestone		Critical Split	
Split		Project Summary		Inactive Summary		Manual Summary Rollup		Finish-only		Deadline		Progress	
Milestone		Inactive Task		Manual Task		Manual Summary		External Tasks		Critical		Manual Progress	

# PROJECT OVERVIEW

MON 7/3/23 - FRI 12/26/25



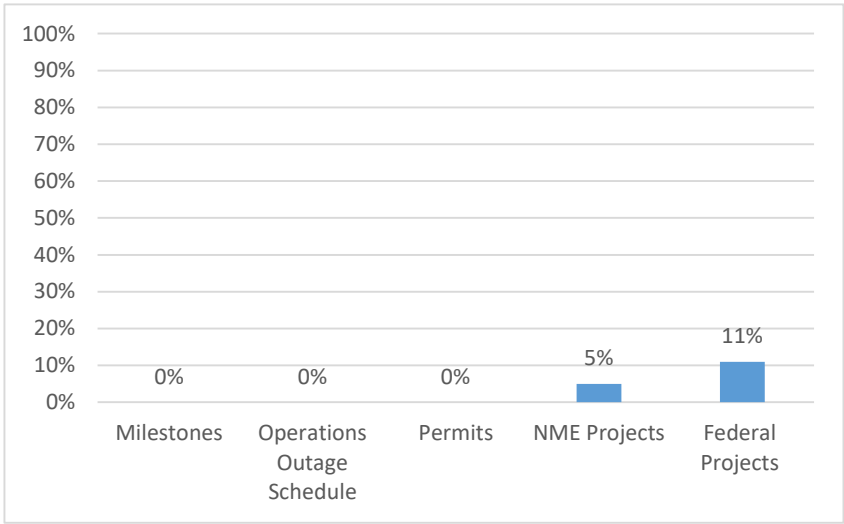
## MILESTONES DUE

Milestones that are coming soon.

Name	Finish
Projects Completed at Cambalache	Mon 12/25/23
Projects Completed at Palo Seco Power Plant	Mon 7/1/24
Projects Completed at Mayaguez	Mon 7/29/24
Projects Completed at San Juan Power Plant	Fri 8/16/24
Projects Completed at Aguirre Power Plant	Tue 10/22/24
Projects Completed at Costa Sur Power Plant	Fri 12/12/25
Combustion Turbine 5	Mon 9/11/23
Steam Turbine 5	Mon 7/3/23
Combustion Turbine 6	Mon 3/11/24
Steam Turbine 6	Mon 3/11/24
Steam Boiler 7	Mon 2/12/24
Steam Boiler 9	Mon 4/8/24
Steam Boiler 3	Mon 1/1/24
Steam Boiler 4	Fri 9/22/23
Steam Boiler 6	Fri 1/5/24
Steam Boiler 1	Mon 7/3/23
Steam Boiler 2	Mon 11/20/23
Combine Cycle Stack 1	Fri 1/26/24
Combine Cycle Stack 2	Fri 1/26/24

## % COMPLETE

Status for all top-level tasks. To see the status for subtasks, click on the chart and update the outline level in the Field List.



## LATE TASKS

Tasks that are past due.

Name	Start	Finish	Duration	% Complete	Resource Names
Steam Turbine 5	Mon 7/3/23	Mon 7/3/23	0 days	0%	
Steam Boiler 1	Mon 7/3/23	Mon 7/3/23	0 days	0%	
Aguirre Unit 1 - Environmental Maintenance	Mon 7/3/23	Fri 8/11/23	30 days	0%	Subcontracts[ \$3,000,000.00 ]
Procurement Water Heater for Dearator	Mon 7/3/23	Mon 8/7/23	23 days	0%	Subcontracts[ \$400,000.00 ]
PREB Approval for RFP Changes	Mon 7/3/23	Fri 9/1/23	45 days	0%	
Fuel Igniters Replacement Installation	Mon 7/10/23	Fri 9/29/23	60 days	0%	Subcontracts[ \$2,364,000.00 ]







CASH FLOW

Actual Cost	Baseline Cost	Remaining Cost	Cost Variance
\$17,100,215.96	\$908,250,079.86	\$877,440,863.90	(\$13,709,000.00)



The chart shows the project's cumulative cost and the cost per quater. To see the costs for a different time period, select the Edit option from the Field List.

The table below shows cost information for all top-level tasks. To see cost stats for all tasks, set the Outline Level in the Field List.

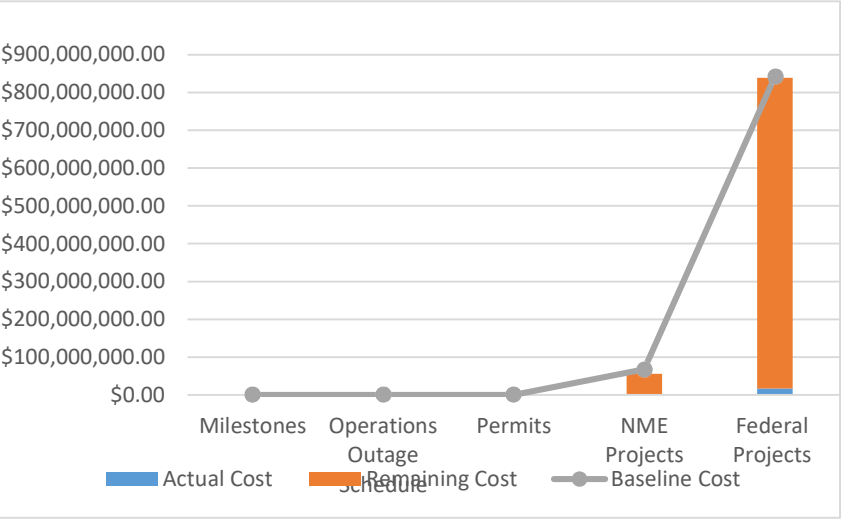
Name	Remaining Cost	Actual Cost	Cost	ACWP	BCWP	BCWS
Milestones	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Operations Outage Schedule	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Permits	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
NME Projects	\$55,957,526.53	\$177,428.33	\$56,134,954.86	\$177,428.33	\$57,619.66	\$3,000,000.00
Federal Projects	\$821,483,337.37	\$16,922,787.63	\$838,406,125.00	\$16,922,787.63	\$14,342,086.84	\$2,285,388.25

000.00)

# TASK COST OVERVIEW

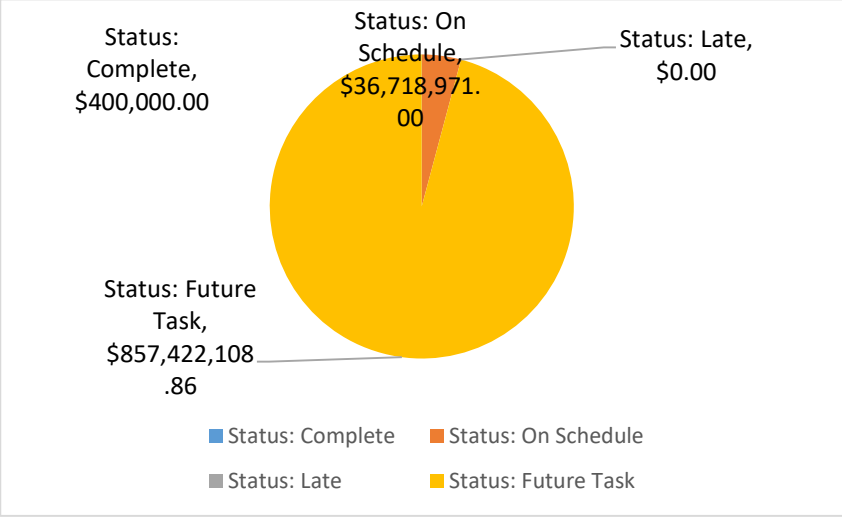
## COST STATUS

Cost status for top-level tasks.



## COST DISTRIBUTION

How costs are spread out amongst tasks based on their status.



## COST DETAILS

Cost details for all top-level tasks.

Name	Fixed Cost	Actual Cost	Remaining Cost	Cost	Baseline Cost	Cost Variance
Milestones	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Operations Outage Schedule	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Permits	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
NME Projects	\$0.00	\$177,428.33	\$55,957,526.53	\$56,134,954.86	\$67,079,954.86	(\$10,945,000.00)
Federal Projects	\$0.00	\$16,922,787.63	\$821,483,337.37	\$838,406,125.00	\$841,170,125.00	(\$2,764,000.00)



# CRITICAL TASKS

A task is critical if there is no room in the schedule for it to slip.

[Learn more about managing your project's critical path.](#)

- Status: Complete
- Status: On Schedule
- Status: Late
- Status: Future Task

Name	Start	Finish	% Complete	Remaining Work	Resource Names
Aguirre Procurement General	Mon 7/3/23	Fri 10/13/23	59%	0 hrs	
PREB Approval for RFP Changes	Mon 7/3/23	Fri 9/1/23	0%	0 hrs	
Procurement Long Lead Iteams	Mon 9/4/23	Fri 11/3/23	0%	0 hrs	Subcontracts
Procurement EPC Contract	Mon 9/4/23	Fri 11/3/23	0%	0 hrs	Subcontracts
FAASt New Black Start System at Costa Sur	Mon 11/6/23	Fri 12/26/25	0%	0 hrs	Subcontracts[\$45,200,000.00]
FAASt New Black Start System at Aguirre (Yabucoa)	Mon 11/6/23	Fri 12/26/25	0%	0 hrs	Subcontracts[\$45,200,000.00]
Simple Gas Turbines	Mon 11/6/23	Fri 12/26/25	0%	0 hrs	Subcontracts[\$613,541,936.00]