

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

NEPR

Received:

Dec 7, 2023

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IN RE:

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

CASE NO. NEPR-MI-2021-0002

**SUBJECT: LUMA's Motion To Submit
Information on Status of Due Diligence to Allow
Genera BESS Projects to Interconnect, in
Compliance with Resolution and Order of
November 30, 2023**

**LUMA'S MOTION TO SUBMIT INFORMATION ON STATUS OF DUE
DILIGENCE TO ALLOW GENERA BESS PROJECTS TO INERCONNECT, IN
COMPLIANCE WITH RESOLUTION AND ORDER OF NOVEMBER 30, 2023**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC¹, and LUMA Energy ServCo, LLC², (jointly referred to as "LUMA"), through the undersigned legal counsel and respectfully submit and request the following:

1. On October 27, 2023, Genera PR, LLC ("Genera") filed with this honorable Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") an *Amended Motion for Leave to Submit Amendment to Project and 406 BESS Initial Scope of Work* ("Genera October 27th Motion") in which Genera presented to the Energy Bureau a proposal to "use existing points of interconnection ("POI") in PREPA's legacy generation facilities to install utility-scale batteries", an approach which Genera indicates will "provide flexibility and resiliency to the operation of the generation fleet" (as described in the Genera October 27th Motion, the "Genera BESS Projects"). See Genera October 27th Motion on pages 5-6. Genera also requested the Energy Bureau to grant Genera leave to present to the Puerto Rico Central Office for Recovery, Reconstruction and

¹ Register No. 439372.

² Register No. 439373.

Resiliency and the Federal Emergency Management Agency (“FEMA”) a Project Amendment³ and a Section 406 Initial SOW for the Genera BESS Projects and “to continue with all activities required to complete the essential documentation and analysis to complete the [Genera BESS Projects]”. *See id.* at pages 8 and 9.

2. On November 8, 2023, the Energy Bureau issued a Resolution and Order conditionally approving the Genera BESS Projects.

3. On November 30, 2023, the Energy Bureau issued a Resolution and Order (“November 30th Resolution and Order”) in which, among others, it made reference to an informal presentation conducted by LUMA to the Commissioners of the Energy Bureau of a concept developed by LUMA known as Accelerated Storage Addition Program (“ASAP”) and ordered LUMA to present, within five (5) business days from the notification of the November 30th Resolution and Order, a filing including the following:

- i. A detailed description and discussion of the concept of the [ASAP], including its benefits (e.g., economic, operational, etc.);
- ii. The status of the efforts towards formalizing the [ASAP];
- iii. A discussion on any barriers identified that may impact the implementation of the [ASAP], including any input from the stakeholders; [...]
- iv. A discussion on the impacts of the [ASAP], if any, on the [Genera BESS Projects] [...] [and]
- v. The status of LUMA’s due diligence to allow the [Genera BESS Projects] to interconnect at the various sites.

See id.

4. On December 4, 2023, LUMA informed this honorable Energy Bureau that, although it is very advanced in its efforts to develop the ASAP concept, it needed additional time

³ This term refers to an amendment to an existing project submitted to FEMA that is already obligated (described as Long Lead Items (Equipment) Project # 6763691) to disburse up to 50% in advance for equipment purchase.

to prepare a more complete filing for this Energy Bureau to address the requests pertaining to the ASAP concept, which appear in items (i) through (iv) of the November 30th Resolution and Order quoted above. Therefore, LUMA requested until December 21, 2023 to submit such information, which request is reiterated herein.

5. Regarding the request in item (v) of the November 30th Resolution and Order quoted above, LUMA herein respectfully submits in Exhibit 1 hereto, information on the status of LUMA's due diligence to allow Genera BESS Projects to interconnect at various sites. *See* Exhibit 1.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **deem** LUMA in compliance with the requirement in its Resolution and Order of November 30, 2023 for LUMA to submit the status of LUMA's due diligence to allow Genera BESS Projects to interconnect at various sites.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and we will send an electronic copy of this motion to lionel.santa@prepa.com; alopez@sbglaw.com; jfr@sbglaw.com; and jlago@sbglaw.com.

In San Juan, Puerto Rico, on this 7th day of December 2023.



DLA Piper (Puerto Rico) LLC
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/s/Laura T. Rozas
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Exhibit 1

Status of LUMA's due diligence to allow Genera BESS Projects to interconnect at various sites

LUMA's Accelerated Storage Addition Program

NEPR-MI 2021-0002

Response: ROI-LUMA-MI-2021-0002-20231207-PREB-0005

SUBJECT

GENERA BESS Interconnection Status

REQUEST

The status of LUMA's due diligence to allow the GENERA BESS Projects to interconnect at the various sites.

RESPONSE

LUMA and Genera are working together to review the opportunities to install BESS and peakers at existing PREPA/Genera operating generation locations. Both LUMA and Genera are in strong agreement that installation of any additional BESS at no capital cost will create significant benefits to ratepayers. The teams and leaders from LUMA and Genera have been identified and are working together to achieve the objectives.

The status of activities completed to date include:

- Several meetings have been held on Teams between the LUMA and Genera team members to discuss Genera's request for maximum capacity injection evaluation. See attached.
- Documentation has been discussed and exchanged related to Energy Storage MTRs, Cyber Security and Telemetry specifications to ensure the requirements can be met.
- Genera and LUMA verbally agreed the initial scope of review covers the amount of BESS and peakers capacity that is limited by the existing Point of Interconnection (POI). This involves batteries and peakers that can be added to the system today with existing transformer and other assets installed, so that no system studies, upgrades, or modifications would be expected at this time.
- In addition, system impact studies are required to identify maximum capacity at each site. This would be coordinated with contracted projects, and in coordination with the Tranches being procured by PREPA and the Energy Bureau.

Via Electronic Mail

Mr. Mario Hurtado
Chief Regulatory Officer
LUMA Energy, LLC
Email: mario.hurtado@lumapr.com

**Re: NEPR-MI-2022-0005
10 Year Plan Federally Funded Competitive Process
Request for Analysis of Maximum Injection Capacity**

Dear Mr. Hurtado,

Genera PR LLC (“Genera”) is developing certain strategies to improve and modernize the existing generation fleet as part of its duties and responsibilities under the LGA OMA.¹ These strategies aim to meet the Energy Public Policy goals set forth in Act 57-2014², Act 17-2019³ and all related statutes and regulations. Our ultimate priority is to ensure that Puerto Rico has adequate and efficient generation resources compliant with all public policies and laws.

To this end, Genera is pursuing various strategies to enhance its existing fleet, including the procurement of highly efficient technology to replace the current combustion turbine peaking units. Our goal is to achieve black start capabilities, flexibility, resilience, load balance, and grid support, among other benefits. We are optimizing the plan for each location using highly efficient energy resource technologies, available footprint, configuration, and fuel delivery strategies, among other factors.

¹ The Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement dated as of January 24, 2023, (“LGA OMA”) among (a) the Puerto Rico Electric Power Authority, (b) the Public-Private Partnership Authority, and (c) Genera.

² *The Puerto Rico Energy Transformation and Relief Act*, as amended.

³ *The Puerto Rico Energy Public Policy Act*.

To complete this optimization plan, we require information on the maximum power injection capacity at each interconnection point without violating thermal, voltage, or stability limits. We kindly request that LUMA⁴, as operator of the T&D System, provide us with the maximum injection capacity (in MW) for each of the 15 generators that comprise the combustion turbine peaking units at the Dagua, Yabucoa, Jobos, Aguirre, Costa Sur, Vega Baja, and Palo Seco facilities. We request that LUMA carry out the study while assuming that Genera will increase the capacity of each main power transformer that connects the existing generators at each site and the main breaker, if necessary.

We kindly ask LUMA to provide us with the requested information by November 8, 2023. If you have any questions, please do not hesitate to contact us.

Sincerely,

Katiuska Bolaños

Katiuska Bolaños Lugo
Chief Regulatory Officer
Genera PR, LLC

⁴ Capitalized terms not defined herein shall be ascribed the definition provided in the LGA OMA.