

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

NEPR
Received:
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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 Response in
Compliance with Resolution and Order dated
May 29, 2023.

**MOTION TO SUBMIT RESPONSE IN COMPLIANCE WITH RESOLUTION AND
ORDER DATED MAY 29, 2024**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On November 29, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Visits for revision of FEMA and COR3 approved projects* (“November 29th Order”) to establish visits and inspections for the generation, transmission, and distribution facilities to ensure the progress of the approved projects. In the November 29th Order, the Energy Bureau authorized its Technical Consultant, Alianza Engineering Services, to inspect the Sites on behalf of the Energy Bureau. Additionally, the Energy Bureau ordered Genera to designate a Point of Contact (“POC”) with whom the Energy

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority (“P3 authority”) and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (defined in the LGA OMA) 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.

Bureaus could coordinate the plan to execute the inspections, the frequency of the inspections and the determine any applicable access and coordinate the site inspections.

2. On May 29, 2024, the Energy Bureau issued a Resolution and Order titled *Dates and Frequency for the Visits for Revision of FEMA and COR3 Approved Projects* (“May 29th Resolution”). The Energy Bureau noted in the May 29th Resolution that Alianza Engineering Services and Energy Bureau personnel have visited all the Generation Facilities under Genera's LGA OMA, that the list of all the projects has been reviewed, and that Genera's principal management personnel have participated and presented the status of the projects during each of the site visits. Additionally, the Energy Bureau determined that to accomplish effective progress of the projects, the Alianza Engineering Services personnel must participate every two weeks in those meetings and afterward, proceed with a walkthrough to inspect and document the progress of the projects. As such, the Energy Bureau outlined in Table 1 of the May 29th Resolution the assigned personnel from Alianza Engineering Services that should participate in the meetings and the frequency for the visits.

3. Consequently, in the May 29th Resolution, the Energy Bureau ordered Genera to (i) effectively coordinate the participation of the authorized personnel mentioned in Table 1 of the May 29th Resolution for the project meetings that occur within each facility, (ii) provide the Energy Bureau with confirmation of such coordination, and (iii) furnish the contact information of the POC, whom the authorized personnel mentioned in Table 1 of the May 29th Resolution can contact for the access requirements and the details for progress visits.

4. In compliance with the May 29th Resolution, Genera respectfully informs the Energy Bureau that Genera has been in communication with the engineers, consultants, and personnel of the Energy Bureau to coordinate the scheduled meetings as outlined in Table 1 of the

May 29th Resolution. Genera commits to ensuring that all authorized personnel listed in Table 1 of the May 29th Resolution are fully informed and prepared to participate in the meetings at each facility. Additionally, Genera hereby provides the details of the POC, whom the authorized personnel mentioned in Table 1 of the May 29th Resolution can contact for access requirements and details of progress visits. The POC is Coraline Ramirez Zeno, and the contact information is as follows:

Name: Coraline Ramirez Zeno
Mobile number: (787)404-0869
E-mail: coraline.ramirez@genera-pr.com

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **deem** Genera to be in compliance with the May 29th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of June 2024.

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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 we will send an electronic copy of this motion to the PREPA's counsel, Mirelis Valle Cancel, at mvalle@gmlex.net, and Alexis Rivera, at arivera@gmlex.net; and to LUMA's counsel, Margarita Mercado, at margarita.mercado@us.dlapiper.com, and Yahaira De La Rosa, at yahaira.delarosa@us.dlapiper.com.

In San Juan, Puerto Rico, this 11th day of June 2024.

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez