

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

**NEPR**

**Received:**

**Jul 9, 2024**

**5:52 PM**

**IN RE:**

10 YEAR PLAN FEDERALLY FUNDED  
COMPETITIVE PROCESS

**CASE NO.:** NEPR-MI-2022-0005

**SUBJECT:** Motion to Submit Supplemental  
Information to the Motion Submitted on July 8,  
2024, and Request for Confidential Treatment

**MOTION TO SUBMIT SUPPLEMENTAL INFORMATION TO THE MOTION  
SUBMITTED ON JULY 8, 2024, AND REQUEST FOR CONFIDENTIAL TREATMENT  
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 counsels of record, and respectfully submits and prays as follows:

1. On July 8, 2024, Genera submitted a document titled *Motion to Submit Response to Request for Information in Compliance with Resolution and Order dated June 21, 2024* (“July 8<sup>th</sup> Motion”), whereby Genera submitted as Exhibit A therein its responses to the Second Request for Information outlined in Attachment A to the June 21<sup>st</sup> Resolution.

2. Genera submits additional supplemental information as Exhibit A to this Motion to further the Energy Bureau’s ongoing evaluation of the Grid Support Units Project Update (“GSUPU”) and provide a more detailed explanation of several technical aspects and evaluation. This submission is intended to supplement the information provided in the July 8<sup>th</sup> Motion by specifically refining and expanding upon the previously submitted details. The supplemental

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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 (“P3 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 PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

information includes further insights into the proposed enhancements and operational strategies for the Grid Support Units. The primary purpose of this supplemental submission is to offer precise and comprehensive data that will assist the Energy Bureau in its thorough review of the GSUPU, effectively addressing any potential questions regarding its technical, environmental, and economic implications.

3. The supplemental information submitted herein as *Exhibit A* is intimately related to the GSUPU, which was originally submitted under seal of confidentiality with the June 5<sup>th</sup> Motion, and Genera's responses to the Second Request for Information outlined in Attachment A to the June 21<sup>st</sup> Resolution, also submitted under seal of confidentiality with the July 8<sup>th</sup> Motion. Given the inclusion of sensitive proprietary commercial information within these responses and the ongoing nature of the Request for Proposal process concerning the units in question, Genera respectfully requests that the Energy Bureau maintain the confidentiality of Exhibit A 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. Genera asserts that the information contained in Exhibit A warrants confidential treatment under the same legal precedents and arguments advanced in the June 17<sup>th</sup> Memorandum of Law. Accordingly, Genera respectfully requests the Energy Bureau to uphold the confidentiality of Exhibit A as submitted.

WHEREFORE, for the reasons stated above, Genera respectfully requests the Energy Bureau to **take notice** of the above; **accept** Genera's supplemental information to the July 8<sup>th</sup> Motion submitted herein as *Exhibit A*; and **grant** Genera's request for confidential treatment of the supplemental information, submitted as Exhibit A herein.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 9<sup>h</sup> day of July 2024.

**ECIJA SBGB**

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TSPR 9,669

/s/ Alejandro López-Rodríguez

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TSPR 22,996

## 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 PREPA through its counsels of record, Alexis G. Rivera Medina, at [arivera@gmlex.net](mailto:arivera@gmlex.net), and Mirelis Valle Cancel at [mvalle@gmlex.net](mailto:mvalle@gmlex.net).

In San Juan, Puerto Rico, this 9<sup>th</sup> day of July 2024.

*/s/ Alejandro López-Rodríguez*  
Alejandro López-Rodríguez

**Exhibit A**

Response to Request for Information  
(submitted under seal of confidentiality)