

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

NEPR Received: Aug 9, 2024 4:13 PM

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 Monthly BESS
Progress Report in Compliance with Resolutions
and Orders Dated February 1, 2024, and April
23, 2024

**MOTION TO SUBMIT MONTHLY BESS PROGRESS REPORT
IN COMPLIANCE WITH RESOLUTIONS AND ORDERS DATED FEBRUARY 1, 2024,
AND APRIL 23, 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 February 1, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA's November 21 Motion Submitting Response in Compliance with the Resolution and Order Dated November 8, 2023, and Requesting a Time Extension to Provide the Detailed Scope of Work per Site* (“February 1st Order”). In the February 1st Order, the Energy Bureau approved the projects included in Attachment A therein and noted that Genera is required to present these approved projects to FEMA and COR3 to finalize their approval process.

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 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.

2. Additionally, in the February 1st Order, the Energy Bureau ordered Genera to submit monthly reports on the progress of the interconnection studies to be undertaken by LUMA, as well as updates on the development status of the detailed SOWs and the BESS Request for Proposals (“RFP”) (“Monthly Progress Report for the BESS Project”).

3. On March 28, 2024, Genera filed a document with the Energy Bureau titled *Motion to Submit Scope of Work in Compliance with Resolution and Order dated November 8, 2023* (“March 28th Motion”). As Exhibit A to the March 28th Motion, Genera filed Project #164988, titled *Island Wide Generation Fleet Project for Vega Baja, Arecibo, and Salinas*, comprising 274 MW of the total of 430 MW of BESS resource originally included in the October 27th Motion.²

4. On April 23, 2024, the Energy Bureau issued a Resolution and Order titled *Resolution and Order on Motion to Submit Scope of Work in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on March 28, 2024 and Memorandum of Law in Support of Confidential Treatment of Scope of Work Submitted on March 28, 2024, in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on April 8, 2024* (“April 23rd Resolution”). In the April 23rd Resolution, pertinent to this motion, the Energy Bureau reiterated to Genera the February 8th Order regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the Monthly Progress Report for the BESS Project any updated information concerning the locations and MW quantities comprising the total of 430 MW of BESS projects across the full set of nine (9) project locations originally included in the October 27th Motion and referenced in Figure 1 of Exhibit A to the March 28th Motion.

² See, *In re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan – December 2020*, Case No. NEPR-MI-2021-0002, *Amended Motion for Leave to Submit Amendment to Project and 406 BESSs Initial Scope of Work*, filed by Genera on October 27, 2024 (“October 27th Motion”).

5. In compliance with the February 1st Order and the April 23rd Resolution, Genera respectfully submits to the Energy Bureau its Monthly Progress Report for the BESS Project for the month of July as *Exhibit A* to this motion.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **deem** Genera to be in partial compliance with the February 1st Order and April 23rd Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of August 2024.

ECIJA SBGB
PO Box 363068
San Juan, Puerto Rico 00920
Tel. (787) 300.3200
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo
jfr@sbgblaw.com
TSPR 9,669

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez
alopez@sbgblaw.com
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 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 9th day of August 2024.

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez

Exhibit A.
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

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

RE: BESS Monthly Report

- Bi-weekly meetings have been scheduled to discuss interconnection packages.
- The work needed to continue/complete interconnection application packages will enable connection at the power plants where BESS/Peaker's project will take place. To expedite upgrades and construction of substations at these sites:
 - Genera/LUMA are assessing two (2) options for preparing 100% of the facility design at the Point of Interconnection (POI) under LUMAs premises:
 - Option 1: Luma prepares 30% of the design as part of the Interconnection Facility Study, and Genera completes the remaining 70% to reach 100%.
 - Option 2: Luma prepares 100% of the design as part of the Interconnection Facility.
 - For the construction needed at the POI, Genera/LUMA assessing:
 - Option 1: Genera constructs the POI following Luma's specifications.
 - Option 2: Luma builds the POI.
- Genera/LUMA reviewing Federal Funding Requirements for invoicing and financing the interconnection studies.
- No updates to table below:

	Location	Action	Responsible	Status	Next Steps
	All sites	Genera will provide a project site schedule to LUMA once the technology is awarded and lead times are agreed with proponents.	Genera	Pending	
1	Cambalache	Draft interconnection packages have been sent to LUMA for review. These drafts included single line diagrams and general arrangements.	Genera	Started	LUMA to send comments to draft submitted by Genera.
		Investigate Auxiliary Transformer source/hookup.	Genera	Started	Genera to develop the single line diagram (SLD).
		Discuss switchyard alternative design.	Genera	Pending	Pending SLD.
2	Vega Baja	Draft interconnection packages have been sent	Genera	Started	LUMA to send comments to draft submitted by Genera.

		to LUMA for review. These drafts included single line diagrams and general arrangements.			
3	Costa Sur	Draft interconnection packages have been sent to LUMA for review. These drafts included single line diagrams and general arrangements.	Genera	Started	LUMA to send comments to draft submitted by Genera.
4	Aguirre	Draft interconnection packages have been sent to LUMA for review. These drafts included single line diagrams and general arrangements.	Genera	Started	LUMA to send comments to draft submitted by Genera.
		Draft interconnection packages have been sent to LUMA for review. These drafts included single line	Genera	Started	LUMA to send comments to draft submitted by Genera.

		diagrams and general arrangements.			
5	Palo Seco	38kv line in Dagua0 (not in service now) will require repairs and relocation or to be removed as part of the project SOW. LUMA to review.	LUMA	Started	Pending further discussions with Luma.
		Genera must send updated draft of the interconnection package to LUMA.	Genera	Started	
6	Dagua0	Draft interconnection packages have been sent to LUMA for review. These drafts included single line diagrams and general arrangements.	Genera	Started	LUMA to send comments to draft submitted by Genera.
		Draft interconnection packages have been sent	Genera	Started	LUMA to send comments to draft submitted by Genera.

		to LUMA for review. These drafts included single line diagrams and general arrangements.			
7	Jobos	Additional bay being requested for the 230KV structure in Yabucoa. LUMA to provide drawings to Genera.	LUMA		Pending further discussions with Luma.
8	Yabucoa	LUMA needs to send proposed expansion to switch yards with timelines and schedules.	LUMA		Genera has informed Luma of the necessity for the BESS project in Yabucoa to ensure sufficient blackstart capacity for critical loads during a system-wide blackout.
9		Draft interconnection packages have been sent to LUMA for review. These drafts included single line diagrams and general arrangements.	Genera	Started	Closer coordination between LUMA and Genera is needed for this site.

