

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

**NEPR**

**Received:**

**Aug 23, 2024**

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**IN RE:**

REQUEST FOR APPROVAL OF THE  
VEGA BAJA DECOMMISSIONING  
PLAN

**CASE NO.:** NEPR-MI-2024-0003

**SUBJECT:** Motion to Submit Final  
Decommissioning Plan in Compliance with  
Resolution and Order dated June 27, 2024 and  
Responses to Energy Bureau's staff letter dated  
July 23, 2024

**MOTION TO SUBMIT FINAL DECOMMISSIONING PLAN IN COMPLIANCE WITH  
RESOLUTION AND ORDER DATED JUNE 27, 2024 AND RESPONSES TO ENERGY  
BUREAU'S STAFF LETTER DATED JULY 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"),<sup>1</sup> through its counsels of record, and respectfully submits and prays as follows:

1. On April 17, 2024, Genera submitted a letter to the Chairman of the Public Service Regulatory Board of the Energy Bureau, Mr. Edison Avilés Deliz ("Letter to the Chairman"), in which it requested that the Energy Bureau initiate a formal proceeding to evaluate the Draft Decommissioning Plan ("Preliminary Draft Plan"), submitted as Annex A to the Letter to the Chairman. In this submission, Genera also sought feedback to refine and finalize the decommissioning procedures. The submission of the Letter to the Chairman and the Draft Decommissioning Plan was made entirely under a seal of confidentiality.

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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.

2. On April 24, 2024, Genera filed a document entitled *Memorandum of Law in Support of Confidential Treatment of Vega Baja Decommissioning Plan*. In the Letter to the Chairman, Genera requested the Energy Bureau's "review" and "input" on the Preliminary Draft Plan.

3. On June 27, 2024, the Energy Bureau issued a Resolution and Order titled *Opening Proceeding and Requirements of Information* ("June 27<sup>th</sup> Resolution"). In the June 27<sup>th</sup> Resolution, the Energy Bureau acknowledged Genera's proactive efforts and deemed it appropriate to commence an informal review process of the Preliminary Draft Plan involving Genera, the P3 Authority, and the Energy Bureau staff and consultants. This informal process aims to streamline the procedures mandated by the LGA OMA for the implementation of LGA decommissioning-related activities, particularly those related to PREPA's Vega Baja facility. The Energy Bureau highlighted that this review would allow it to gather information that may inform the evaluation of the final plan. Additionally, the Energy Bureau's inquiries may provide Genera with insights into areas of interest that should be addressed in the final plan.

4. As such, the Energy Bureau ordered Genera and the members of the Energy Bureau staff, with the participation of the P3 Authority, to begin an informal review process for the Preliminary Draft Plan, as outlined in Part III of the June 27<sup>th</sup> Resolution, no later than seven (7) days following the issuance of the June 27<sup>th</sup> Resolution. Additionally, the Energy Bureau required Genera to submit a summary of the progress made towards the expedited evaluation of a final decommissioning plan for the Vega Baja facility no later than thirty (30) days thereafter.

5. On July 16, 2024, in compliance with the June 27<sup>th</sup> Resolution, Genera held an initial meeting with the Energy Bureau consultants and the P3 Authority to discuss the plan to decommission the Vega Baja facility ("July 16<sup>th</sup> Meeting"). At this meeting, Genera presented the

Preliminary Draft Plan, which was updated to include a thorough breakdown of the timing for each decommissioning step, illustrated with a Gantt chart depicting all activities, including procurement. The Energy Bureau consultants agreed to review the Preliminary Draft Plan presented by Genera and provide feedback, which would assist Genera in refining the plan and summarizing the advancements made towards finalizing the decommissioning strategy.

6. On July 23, 2024, the Energy Bureau staff members provided comments to the Preliminary Draft Plan and attached as Annex A, their recommendations ("July 23<sup>rd</sup> Letter").

7. On August 5, 2024, Genera submitted a document titled *Motion to Submit Summary Report of Final Decommissioning Plan in Compliance with Resolution and Order dated June 27, 2024* ("August 5<sup>th</sup> Motion"). Through the August 5<sup>th</sup> Motion, Genera submitted a summary report of the progress made on the final decommissioning plan for the Vega Baja facility, as well as the discussions of such progress held with the P3 Authority and the Energy Bureau consultants during the July 16<sup>th</sup> Meeting. Additionally, the summary report concluded that Genera was set to begin reviewing the final version of the decommissioning plan that week, aiming to submit it to the Energy Bureau for evaluation in the forthcoming weeks. This submission was pending Genera's review of the questions and comments posed by the Energy Bureau's consultants regarding the Preliminary Draft Plan presented during the July 16<sup>th</sup> Meeting.

8. In compliance with the June 27<sup>th</sup> Resolution and in accordance with the July 23<sup>rd</sup> Letter, Genera hereby submits the final decommissioning plan for the Vega Baja facility, included herein as *Exhibit A*. To facilitate the review of the final decommissioning plan, Genera hereby submits, as *Exhibit B* to this Motion, a detailed response that outlines and addresses the comments received from the Energy Bureau's consultants, in the July 23<sup>rd</sup> letter, regarding the Preliminary

Draft Plan and identifies specific sections within the final decommissioning plan where each comment has been attended to.

**WHEREFORE**, for the reasons stated above, Genera respectfully requests the Energy Bureau to **take notice** of the above; **accept** Genera's final decommissioning plan for the Vega Baja facility, submitted herein as *Exhibit A*; and **deem** Genera to be in compliance with the June 27<sup>th</sup> Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of August 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.

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of August 2024.

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez

**Exhibit A**

Final Decommissioning Plan



# Vega Baja Proposed Decommissioning Plan

GT Unit 1 | GT Unit 2 | Balance of Plant

SL-018338

August 21, 2024

## Legal Notice

The information included in this Decommissioning Plan (“Plan”) was prepared by Genera PR LLC (“Genera PR”), pursuant to the requirements of the Thermal Generation Facilities Operations and Maintenance Agreement (“OMA”) for the decommissioning of the Legacy Generation Assets, as defined therein. This document provides an insight into the areas of focus and outlines the process that will be followed by Genera PR for the decommissioning of the Vega Baja Legacy Generation Asset. This Plan was prepared using the degree of skill and care ordinarily exercised by professional engineers practicing under similar circumstances. Genera PR prepared this Plan subject to: (1) certain scope limitations, time constraints, and business objectives; (2) information and data provided by third parties, including PREPA and T&D Operator, which may not have been independently verified by Genera PR; and (3) the information and data contained in this Plan are time-sensitive and changes in the data, applicable codes, standards, and acceptable engineering practices may invalidate the findings of this Plan. The information stated herein may include the views or recommendations of third parties and does not necessarily indicate a commitment to a particular course of action. Genera PR is not liable or responsible to any person for any injury, loss or damage of any nature whatsoever arising from or incurred by the use of, reliance on or interpretation of this Plan. Any unauthorized use of the Plan is strictly prohibited. Any copy, disclosure, dissemination, or distribution, either whole, or in part, to any third party is strictly prohibited unless first explicitly agreed by Genera PR.



## Table of Contents

<b>Executive Summary .....</b>	<b>VII</b>
Introduction .....	VII
Vega Baja Description.....	VII
Asset Assessment.....	VIII
Community Engagement.....	VIII
Permitting .....	VIII
Pre-Demolition .....	VIII
Dismantling, Removal, and Demolition .....	VIII
Decommissioning Budget .....	IX
Health, Safety, Security, and Quality Management .....	IX
Employee Transition .....	X
Execution Timeline .....	X
Documentation and Knowledge Management.....	X
Conclusion .....	X
<b>1. Vega Baja Introduction and Description.....</b>	<b>1</b>
1.1. Introduction .....	1
1.2. Location.....	1
1.3. Site and Vicinity General Characteristics.....	3
1.3.1. PHYSICAL SETTING.....	3
1.4. General Site Information and Current Use .....	3
1.4.1. SUMMARY OF SITE USE HISTORY.....	4
<b>2. Asset Assessment and Stabilization .....</b>	<b>1</b>
2.1. Vega Baja Condition Assessment.....	1
2.1.1. GAS TURBINES AND GENERATORS .....	1
2.1.2. VEGA BAJA COMMON SYSTEMS .....	2
2.2. Vega Baja Safety .....	6
2.1. Vega Baja Maintenance .....	7
2.1.1. MAINTENANCE OF MAJOR EQUIPMENT/SYSTEMS .....	7
<b>3. Community Engagement.....</b>	<b>8</b>
3.1. Community Relations Plan.....	8
<b>4. Permitting .....</b>	<b>9</b>
4.1. Existing Permits .....	9
4.2. New Permits .....	9
<b>5. Pre-Demolition.....</b>	<b>10</b>
5.1. Methodology for Protective Measures .....	10

5.2. Equipment Preparation and protective measures for Demolition .....	10
5.3. Safe Disconnects and Modifications for Site Utilities .....	12
5.4. Protection and Hazard Removal .....	13
5.5. Temporary Facilities and Preparation Work.....	14
5.5.1. DECOMMISSIONING ACTIVITIES (PRE-DEMOLITION).....	15
<b>6. Dismantling, Removal, and Demolition .....</b>	<b>17</b>
6.1. Methodology for Dismantling, Removal, Demolition, and preparation for restoration .....	17
6.1.1. DEMOLITION.....	17
6.2. Decontamination, Waste Disposal and Restoration .....	22
6.2.1. SITE RESTORATION .....	22
6.2.2. POTENTIAL CONTAMINANTS.....	22
6.2.3. ASBESTOS AND LEAD BASED PAINT .....	23
6.2.4. POLYCHLORINATED BIPHENYLS (PCBS).....	25
6.2.5. SOIL AND GROUNDWATER.....	25
6.2.6. HAZARDOUS AND NON-HAZARDOUS WASTE HANDLING .....	26
<b>7. Decommissioning Budget.....</b>	<b>28</b>
7.1. Decommissioning Budget Summary .....	28
7.2. Basis of Decommissioning Cost Estimate .....	28
7.2.1. ESTIMATE DEVELOPMENT METHODOLOGY .....	29
7.2.2. GENERAL ASSUMPTIONS .....	29
7.2.3. DIRECT COSTS .....	31
7.2.4. LABOR WAGE RATES .....	31
7.2.5. LABOR WORK SCHEDULE AND OTHER COSTS .....	31
7.2.6. GENERAL CONDITIONS COST.....	32
7.2.7. INDIRECT EXPENSES .....	32
7.2.8. ESCALATION RATES .....	32
7.2.9. CONTINGENCY.....	33
CONTRACT STRATEGY.....	33
7.3. Cost Estimate summary .....	33
<b>8. Health, Safety, Security, and Quality Management .....</b>	<b>34</b>
8.1. General requirements .....	34
8.1.1. STAFFING REQUIREMENTS.....	34
8.1.2. HEALTH AND SAFETY PLAN .....	34
8.2. Air Monitoring Plan.....	35
8.3. Noise Monitoring Plan.....	36
8.4. Environmental Protection Plan.....	36
8.5. Quality Control Plan .....	36
8.6. Geotechnical Investigation .....	38

8.7. Geophysical Investigation .....	38
8.8. Security and Admittance To Site.....	38
8.9. Activities List .....	39
<b>9. Employee Transition.....</b>	<b>41</b>
9.1. Employee Transition .....	41
<b>10. Execution Timeline .....</b>	<b>42</b>
10.1. Execution Timeline.....	42
<b>11. Documentation and Knowledge Management .....</b>	<b>47</b>
11.1. Reporting Requirements .....	47
11.2. Document Control Process .....	47
11.3. Documents .....	47
11.4. Timeline.....	49
11.5. Budget.....	49

## Figures and Tables

FIGURE 1-1 — VEGA BAJA SITE BOUNDARY .....	2
FIGURE 1-2 — VEGA BAJA ADJOINING PROPERTY INFORMATION.....	2
FIGURE 2-1 — VEGA BAJA UNIT 1 – MAJOR SERVICE OUTAGE .....	1
FIGURE 2-2 — VEGA BAJA UNIT 1 BATTERY ROOM .....	4
FIGURE 2-3 — VEGA BAJA UNIT 1 BATTERIES .....	4
FIGURE 2-4 — VEGA BAJA UNIT 1 AIR INTAKE STRUCTURE CORRODED COLUMN .....	5
FIGURE 2-5 — VEGA BAJA STORAGE ROOM.....	6
FIGURE 2-6 — VEGA BAJA JUNCTION BOX CORROSION .....	7
FIGURE 6-1 — VEGA BAJA SITE LEGEND.....	17
FIGURE 6-2 — PLANT MATERIALS, EQUIPMENT AND STRUCTURES TO BE DEMOLISHED.....	19
FIGURE 6-3 — PLANT MATERIALS, EQUIPMENT AND STRUCTURES TO BE DEMOLISHED.....	19
FIGURE 6-4 — PLANT MATERIALS, EQUIPMENT AND STRUCTURES TO BE DEMOLISHED.....	20
FIGURE 6-5 — PLANT MATERIALS, EQUIPMENT AND STRUCTURES TO BE DEMOLISHED.....	20
FIGURE 6-6 — PLANT MATERIALS, EQUIPMENT AND STRUCTURES TO BE DEMOLISHED.....	21
TABLE 2-1 — VEGA BAJA'S ELECTRICAL AND CONTROL SYSTEM'S OBSERVED CONDITION .....	4
TABLE 2-2 — VEGA BAJA'S STRUCTURAL OBSERVED CONDITION.....	5
TABLE 2-3 — VEGA BAJA OBSERVED SAFETY ISSUES .....	6
TABLE 4-1 — VEGA BAJA DEMOLITION-RELATED PERMITS .....	9
TABLE 6-1 — SUMMARY OF PHASE ABOVE GROUND DEMOLITION SCOPE. ....	18
TABLE 6-2 — CONTAMINANT PROFILE OF EQUIPMENT SCHEDULED FOR DEMOLITION.....	23
TABLE 8-1 — ACTIVITIES LIST .....	39
TABLE 10-1 — CONDITIONAL PROJECT DURATION RISKS.....	45

## Acronyms and Abbreviations

Acronym/Abbreviation	Definition/Clarification
AACE	Association for the Advancement of Cost Engineering
ACM	Asbestos-containing material
BESS	Battery Energy Storage Systems
BOP	Balance of Plant
CFR	Code of Federal Regulations
CRECs	Controlled Recognized Environmental Conditions
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
Genera PR	Genera PR LLC
GT	Gas turbine
MPT	Main Power Transformer
NMP	Noise Monitoring Plan
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyls
PREPA	Puerto Rico Electric Power Authority
PREQB	Puerto Rico Environmental Quality Board
RCRA	Resource Conservation and Recovery Act
RECs	Recognized Environmental Conditions
SPCC	Spill Prevention Control Countermeasure
Subject Property	Vega Baja Power Station
SVOC	Semi-Volatile Organic Compounds
T&D Operator	LUMA Energy, LLC
TCLP	Toxicity Characteristic Leaching Procedure
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
Vega Baja	Vega Baja Power Station
VOC	Volatile Organic Compounds

# Executive Summary

## INTRODUCTION

As pursuant to Section 16.1 of the Legacy Generation Asset Operation and Maintenance Agreement, a Decommissioning Notice was issued by the Puerto Rico Public-Private Partnerships Authority ("P3A") on May 16, 2024, to Genera, as operator, for the retirement of two Legacy Generation Assets (Vega Baja GT Unit 1 and GT Unit 2) and the commencement of decommissioning services at these two peaking units. A copy of this Decommissioning Notice is included as Appendix A.

Therefore, Genera PR LLC (Genera PR) has undertaken the task of developing a Decommissioning Plan for the Vega Baja Power Station ("Subject Property") in accordance with the guidelines outlined in Section 16 and Annex XV of the Legacy Generation Asset Operation and Maintenance Agreement. This plan aims to address the decommissioning of the Subject Property (inclusive of GT Unit 1, GT Unit 2, and Balance of Plant systems) which is an electric power generating station located in Vega Baja, Puerto Rico.

The Decommissioning Plan is structured in a three-phased approach including:

1. Permitting
2. Pre-demolition
3. Dismantling, Removal, and Demolition

## VEGA BAJA DESCRIPTION

The Subject Property spans approximately 1.3 acres of land situated at PR-2, km. 39.4, Monte Carlo sector, Barrio Algarrobo, Vega Baja, Puerto Rico. The site is in an urban area surrounded by commercial facilities and residential properties. Notably, the site is within the 100-year flood zone (Zone A) as per the Federal Emergency Management Agency's (FEMA's) floodplain information. The electric power generating station at Vega Baja is comprised of two 21 MW diesel-fired electric generating units along with associated balance-of-plant (BOP) systems and infrastructure such as transformers, storage tanks, and maintenance facilities. The Plant is used mainly for peaking power generation services. Until recently, the facility has been operational for approximately 50 years and has undergone various modifications and upgrades. Currently, both generation units are impaired and are no longer operational. A detailed timeline outlines the sequence of events leading to the commencement of decommissioning work.

## ASSET ASSESSMENT

Vega Baja's gas turbine (GT) power generation Unit 1 ceased operations in August 2022, while power generation Unit 2 has not been operational since 2019 due to a thrust bearing failure. The site's common BOP systems to support the operation of power generation units—including water, fuel, fire protection, and other systems—exhibit signs of aging but remain functional.

## COMMUNITY ENGAGEMENT

Community engagement strategies will be implemented per the "Vega Baja Community Relations Plan". A copy of this Plan is included as Appendix B. The Plan includes open communication, addressing community concerns, gathering feedback, and fostering ongoing community involvement throughout the decommissioning process.

## PERMITTING

The Decommissioning Plan is structured in a three-phased approach which starts with Phase 1 - Permitting. Phase 1 of the decommissioning work starts with an evaluation of the Subject Property's existing permits and acquisition of new ones. This will precede the planned decommissioning activities to ensure compliance with environmental regulations at local, state, and federal levels.

## PRE-DEMOLITION

Phase 2 of the decommissioning work includes preparation of the site for dismantling and demolition activities. During this phase, the site utilities and power grid interconnection will be disconnected. Some site utilities will be modified to support construction activities. Equipment of value, e.g., turbine components, generators, or transformers, will be removed from the site and repurposed, as determined by the operator, to support ongoing generation activities. Hazard assessments will commence and other activities to make the facility safe for dismantling and demolition work. Plans for decontamination, hazardous waste disposal, and remediation activities are outlined to address potential contaminants such as asbestos, lead-based paint, polychlorinated biphenyls (PCBs), and soil and groundwater pollutants. Protective measures will be put in place to protect remaining equipment.

## DISMANTLING, REMOVAL, AND DEMOLITION

Phase 3 of the decommissioning work includes the physical dismantling, removal, and demolition of the site. Detailed specifications will be developed to serve as a guide for the scope of services to be bid on by

qualified contractors. Bid compliance with these specifications will be used in the evaluation process for contract award to perform the work. Phase 3 will be conducted by the selected demolition contractor.

Phase 3 will include minor site restoration ensuring the site is entirely clear and safe. Due to the facility's age, potential contaminants may be present. Remaining hazards will be addressed. Soil and groundwater assessments will be conducted to address potential contamination risks. All waste materials will be classified, handled, and disposed of according to applicable regulations. Hazardous waste will be identified and segregated and disposed of by licensed hazardous material handlers. Non-hazardous waste will also be carefully managed to minimize environmental impact and minor remediation work will commence for contaminated areas of the facility.

## DECOMMISSIONING BUDGET

The estimated decommissioning costs for the Subject Property are presented in 2024 U.S. dollars, covering various aspects of the decommissioning process. The estimated decommissioning expenses include all three phases of the work along with other associated costs. The estimate provides capital cost information for project planning and budgeting evaluations, with a classification based on the advancement of cost engineering (AACE) International standards. Cost estimates were developed using engineering scope information, conceptual design layouts, and information from ongoing bidding processes. The estimate's accuracy falls within a probable range based on project maturity level and estimating methods. Assumptions include detailed dismantling of structures and equipment, disposal of non-recyclable materials, and adherence to safety protocols. Owner's costs have been added to the budget. The estimated decommissioning budget is expected to be entirely federally funded; and no actual costs or direct expenses were identified for Vega Baja (out of service units) in the budget for the years 2023 or 2024. Any incentives earned in accordance with the Legacy Generation Asset Operation and Maintenance Agreement in respect of this budget will be factored into Genera's FY2026 budget.

## HEALTH, SAFETY, SECURITY, AND QUALITY MANAGEMENT

The Health and Safety Plan will be prepared by the selected demolition contractor, outlining safe work practices and hazard control measures. Document control processes will ensure the systematic governance of project-related documents, maintaining accuracy, reliability, and accessibility throughout the decommissioning process. All work will be conducted within a secure area.



## EMPLOYEE TRANSITION

The Vega Baja decommissioning plan does not include an Employee Transition Plan as Genera PR employees will not be affected by the decommissioning of the Subject Property.

## EXECUTION TIMELINE

The Vega Baja decommissioning services timeline is a comprehensive plan with efficient measures for managing the complex process of dismantling and demolishing the facility. Over the course of approximately twenty-nine (29) weeks, the schedule outlines key tasks and timelines, for the complete decommissioning services process. With a focus on regulatory compliance, environmental compliance, safety, and streamlined execution, the schedule and plan provide a guide towards project completion, anticipated within the required timeframe.

## DOCUMENTATION AND KNOWLEDGE MANAGEMENT

Document control is a vital aspect of quality management throughout the pre-Decommissioning, Decommissioning, and post-Decommissioning phases. It ensures the systematic governance of document creation, review, modification, issuance, distribution, maintaining accuracy, reliability, and accessibility while safeguarding against unauthorized alteration or access. The document control process for records related to the decommissioning of the Subject Property is structured in phases including, a) creating folder structures and defining file naming conventions, b) digitizing historical files, c) identifying current and future documents, and d) establishing user access. Document management for the Subject Property and for the company will follow a company policy (in process) for document management and retention of records that complies with the requirements of the Institute of Culture. The person managing that policy and its delegate will receive training from the Institute of Culture.

## CONCLUSION

The decommissioning of the Subject Property poses some challenges due to the site's aging infrastructure, and environmental hazards that may be present. Preservation of the existing main power transformer for future use is of paramount importance. Genera PR is committed to developing a comprehensive Decommissioning Plan that addresses the complexities associated with the site's safe shutdown, salvage and preventative measures, demolition, and remediation work—concluding the decommissioning process. Collaboration with regulatory authorities, stakeholders, and technical experts will be essential to ensure a safe and environmentally responsible decommissioning process.

# 1. Vega Baja Introduction and Description

## 1.1. INTRODUCTION

Genera PR LLC (Genera PR) has undertaken the task of developing a Decommissioning Plan for the Subject Property in accordance with the guidelines outlined in Section 16 and Annex XV of the Legacy Generation Asset Operation and Maintenance Agreement. This plan aims to address the decommissioning of the Subject Property (including GT Unit 1, GT Unit 2, and Balance of Plant systems), which is an electric power generating station located in Vega Baja, Puerto Rico.

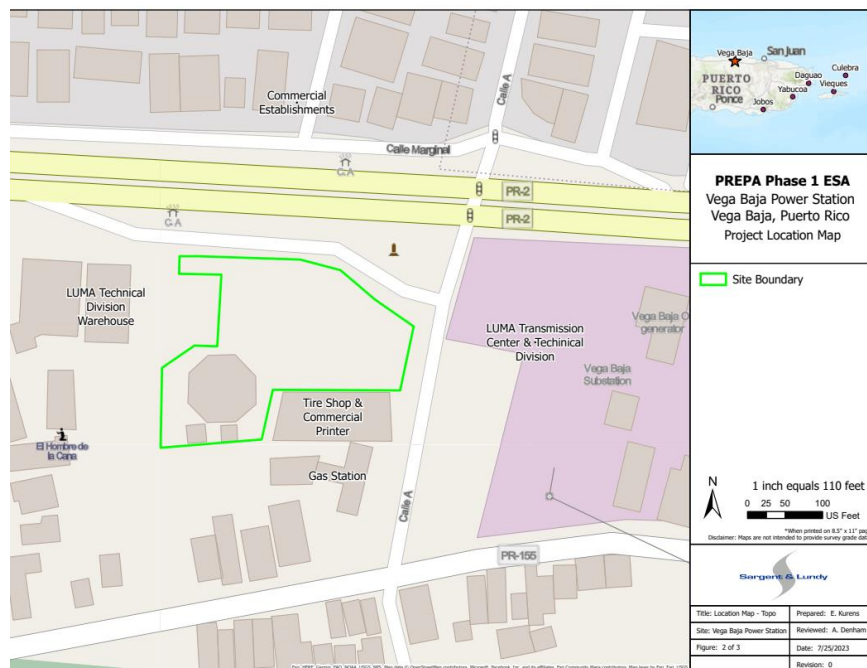
The Decommissioning Plan is structured in a three-phased approach which is described herein and includes the following phases:

1. Permitting
2. Pre-Demolition
3. Dismantling, Removal, and Demolition

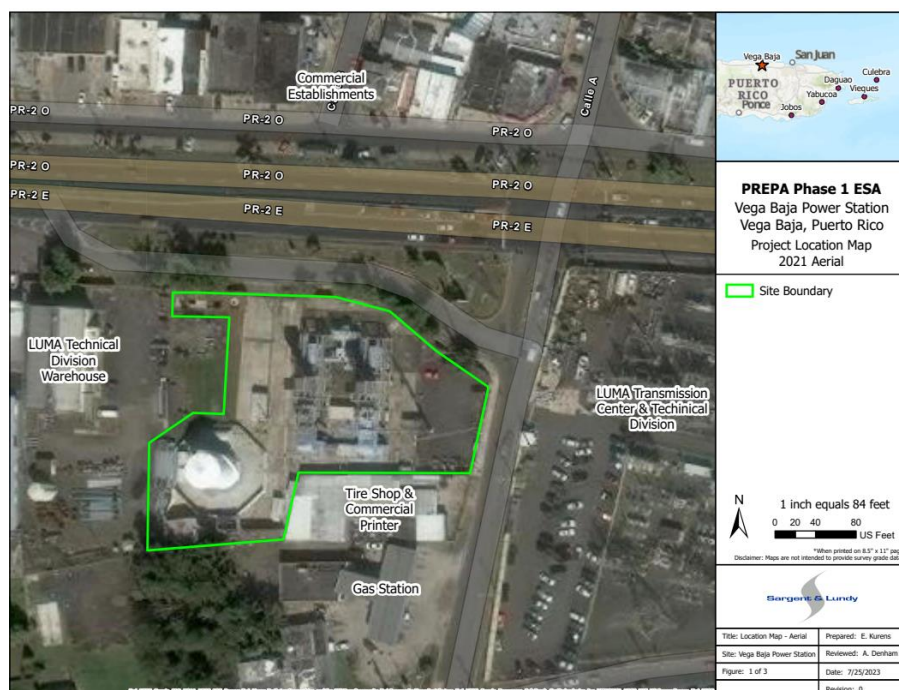
## 1.2. LOCATION

The Subject Property totals approximately 1.3 acres of land located at PR-2, km. 39.4, Monte Carlo sector, Barrio Algarrobo, Vega Baja, Puerto Rico. The Subject Property location and general boundaries are shown on the project maps in Figure 1-1. These were defined based on guidance from PREPA representatives during site visits. Project boundaries and adjoining property information is shown in Figure 1-2.

**Figure 1-1 — Vega Baja Site Boundary**



**Figure 1-2 — Vega Baja Adjoining Property Information**



### 1.3. SITE AND VICINITY GENERAL CHARACTERISTICS

The Subject Property is in an urban area surrounded by commercial facilities and residences. The Subject Property is bounded to the north by State Road PR-2 and commercial establishments, south of the Subject Property is a tire shop and commercial printing business, east of the Subject Property is Street "A" followed by a LUMA power system transmission center, and to the west is the LUMA Technical Division warehouse. The nearest residential properties are located to the north, across State Road PR-2, in the Monte Carlo sector and Las Flores residential community.

#### 1.3.1. Physical Setting

Site elevations range between three to four meters above sea level. Federal Emergency Management Agency floodplain information indicates that the site is located within the 100-year flood zone (Zone A) which is considered a special Flood Hazard Area.

According to information provided by the US Department of Agriculture, the soil in the area, around and including the site, consists of urban land. The drainage class was not reported, which is likely due to the extreme variability in surface conditions from one area to another on and near the site.

### 1.4. GENERAL SITE INFORMATION AND CURRENT USE

The Subject Property is currently developed as an electric power generating station consisting of two 21 MW diesel-fired gas turbine electrical generating units, each with an associated 300 KVA auxiliary transformer. In addition to power generating activities, ancillary activities conducted at Vega Baja include limited equipment and machinery maintenance, electric power transmission, and associated plant operations (e.g., controls and bulk storage). Diesel fuel is received at the Subject Property in a designated area from tanker trucks which unload fuel into the main 276,000-gallon diesel tank. Solid waste produced from these operations (e.g., scrap metal, trash, used oil, and oil contaminated materials) is stored in designated areas throughout the Subject Property before being disposed of offsite.

Storage operations take place in a maintenance and storage area west of the Subject Property. The storage operations consist of storing raw materials into several drums, sacks, plastic totes, and buckets (of various sizes) that include lubricating and cutting oils, paints, chemicals, and other fluids/raw materials that support other operations. Some spare parts and equipment storage are located outside of the generation property boundaries.

Maintenance of the electric power generating equipment is performed onsite. These maintenance operations include welding, electrical work, repair, servicing, and refueling. Any other waste generated from Vega Baja operations (e.g., contaminated soil, construction debris, storage drums, trash, and scrap metal)

is collected and stored in appropriate containers before being assessed for the nature of the waste and/or transported offsite for proper disposal.

Genera PR will endeavor to maximize the utilization of remaining plant items by repurposing them as spare parts for other facilities wherever feasible.

#### 1.4.1. Summary of Site Use History

The Subject Property has operated as an electric power generating station for approximately 50 years. Based on a review of historical topographic maps and aerial photographs, since at least the late 1970s (oldest photographic documentation available), the Subject Property has been bounded to the north by present day PR-2 and surrounded by mostly commercial and residential properties. By 1989, a structure had been constructed adjacent west of the plant. This structure corresponds to the former PREPA Technical Division warehouse, currently operated by LUMA. Residences were constructed farther east and west, and across PR-2, north of the Subject Property. Overall, the surrounding area has included commercial establishments, mostly along and near PR-2, as well as scattered residential communities since the late-1970s. The surrounding area has been in its current configuration since the mid-1980s.



## 2. Asset Assessment and Stabilization

### 2.1. VEGA BAJA CONDITION ASSESSMENT

#### 2.1.1. Gas Turbines and Generators

Vega Baja's gas turbine (GT) Unit 1 was last operated in August 2022. Prior to the outage, the full load rating was 21 MW. Due to ongoing challenges with the repair of Unit 1, it was declared impaired in late 2023 and subsequently, the asset was fully depreciated. With this decision, Unit 1 and all BOP systems may be decommissioned and removed from service, as approved by the Administrator (P3A), Regulator, and the T&D System Operator (LUMA Energy, LLC) when appropriate by the utility.

**Figure 2-1 — Vega Baja Unit 1 – Major Service Outage**



Vega Baja GT Unit 2 has been unavailable since 2019, due to a thrust bearing failure. There is no current intention to restore Unit 2 for service. The turbine blades suffered severe damage across multiple stages. Vega Baja Unit 2 is used for spare parts for other Peaker GTs in the fleet. For example, the generator rotor

was installed at Yabucoa, and the starter motor was installed at Aguirre. The main power breaker was functional when the GT failed, and some small parts have been removed. The main power breaker might be repairable.

In late 2023, due to ongoing challenges and the idle state of Unit 2, it was declared impaired and subsequently, the asset was fully depreciated. With this decision, both Units 1 and 2 and all BOP systems may be decommissioned and removed from service, as approved by the Administrator (P3A), Regulator, and when appropriate by the utility. Components or parts that may be deemed usable for other areas of the operating fleet may be salvaged, as appropriate.

## **2.1.2. Vega Baja Common Systems**

### **2.1.2.1. Water Systems**

The Plant uses a municipal potable water supply from Puerto Rico Aqueduct and Sewer Authority (PRASA) for domestic use in the facility buildings, fire hose stations, and service water hose stations on site. Drains from the units, and curbed containments that may be subject to oil contamination, are directed to the plant's oil-water separator system prior to being discharged back to the municipal sewer system. The existing potable water system is functional and will be reconfigured to support decommissioning services.

### **2.1.2.2. Fuel Systems**

Equipment and piping in the fuel oil truck unloading area shows characteristic signs of aging with chipped coatings and minor surface rust. However, the fuel system remains serviceable. The existing fuel system will be removed from service prior to beginning heavy dismantling and demolition activities.

### **2.1.2.3. Fire Protection**

An automated CO<sub>2</sub> fire protection system to flood and inert the gas turbine enclosure in the event of a fire was never installed for the Vega Baja GTs; fire protection for the units is currently provided by hand-cart-mounted CO<sub>2</sub> extinguisher assemblies located next to the GTs, and by fire hose stations connected to the potable water system. Hand extinguishers are hung at other high-risk locations. The existing fire protection system is functional and will be utilized to support decommissioning services.

### **2.1.2.4. Balance-of-Plant (BOP) Equipment**



There were no critical deficiencies observed for the Plant BOP systems.

### 2.1.2.5. Electrical and Control Systems

The control room is shared for GT Units 1 and 2 and appears to be in proper working order with no observable deficiencies or safety concerns. The existing electrical systems are functional and will be reconfigured to support decommissioning services, including support for the site's stormwater sump pumps, demolition power and temporary power, as required, to ensure the station's main power transformer and auxiliary equipment are operational to keep the oil fill circulating, warm and free of humidity. Table 2-1 presents the O&M (Operations and Maintenance) Assessment Team's observed conditions within the electrical and control systems.




**Table 2-1 — Vega Baja’s Electrical and Control System’s Observed Condition**

Item	Condition
1	<p data-bbox="548 346 1161 380"><b>Figure 2-2 — Vega Baja Unit 1 Battery Room</b></p>  <p data-bbox="264 936 1393 970">A large section of the battery room has debris falling from the ceiling onto the batteries and floor.</p>
2	<p data-bbox="581 1050 1128 1083"><b>Figure 2-3 — Vega Baja Unit 1 Batteries</b></p>  <p data-bbox="264 1507 1442 1629">The batteries require maintenance, liquid levels are at or near minimum level, and several of the batteries show signs of internal corrosion. Suitable care should be taken during their removal to ensure the safety of the workforce.</p>

## 2.1.2.6. Major Structures

Below are a few structural conditions as summarized in Table 2-2.


**Table 2-2 — Vega Baja’s Structural Observed Condition**

Item	Condition
1	<p data-bbox="386 457 1334 493"><b>Figure 2-4 — Vega Baja Unit 1 Air Intake Structure Corroded Column</b></p>  <p data-bbox="305 1218 1390 1339">For the Unit 1 air intake structure, three main support columns have major corrosion on the bottom 3 to 6 inches, where standing water appears to have caused corrosion. Suitable care shall be taken during the removal to ensure the safety of the workforce.</p>


## 2.2. VEGA BAJA SAFETY

The following figures present the O&M Assessment Team's observed conditions regarding safety conditions.

**Table 2-3 — Vega Baja Observed Safety Issues**

Item	Condition
1	<p><b>Figure 2-5 — Vega Baja Storage Room</b></p>  <p>The storage room, located behind the battery room, has an electrical panel and a small transformer with combustibles (paint/paint thinner/gasoline) stored directly in front of them. Suitable care shall be taken by the contractor during the removal to ensure the safety of the workforce.</p>
2	<p>Several of the steps and access platforms to equipment exhibit serious corrosion.</p>



Item	Condition
3	<p>An auxiliary junction box shows signs of corrosion and water/moisture intrusion. The current wiring is corroded, and the step-down transformers are also severely corroded. The contractor shall take suitable care to ensure the safety of the workforce.</p> <p><b>Figure 2-6 — Vega Baja Junction Box Corrosion</b></p> 

## 2.1. VEGA BAJA MAINTENANCE

### 2.1.1. Maintenance of Major Equipment/Systems

Past inspections (2020-2021) found that overall, the Subject Property was in a serviceable condition, but that the GTs and many of their ancillary systems were approaching the end of their useful service lives.

Since that time, in late 2023, due to ongoing challenges and the idle state of both Units 1 and 2, both declared impaired and subsequently, the asset was fully depreciated. No further maintenance on the GTs is planned. However, the main power transformer (MPT) appeared to be in good condition at the time of inspection and will be salvaged for later use.

## 3. Community Engagement

### 3.1. COMMUNITY RELATIONS PLAN

Community engagement will be facilitated using the plan developed by Genera PR, titled “Vega Baja Community Relations Plan.” A copy of the plan is included in Appendix B. The following topics addressed are listed below:

- i. A method to engage with local communities, government agencies and media to initiate open communication and to inform them about the decommissioning process.
- ii. A method to address concerns, answer questions, and gather feedback from residents and local authorities to facilitate ongoing dialogue and transparency.
- iii. A method to consider incorporating mechanisms for ongoing community involvement throughout the decommissioning process.
- iv. The identification of communication channels including websites and local newspapers to disseminate information and gather feedback. Relevant information regarding the size of the Subject Property, its location, and any environmental or community considerations will be provided.

## 4. Permitting

### 4.1. EXISTING PERMITS

Phase 1 of the decommissioning work requires the pre-demolition work to begin. As part of this work, and prior to protective measures, decommissioning, demolition, or remediation activities an evaluation of existing local, state, and federal-level environmental permits will be performed. This evaluation is to identify permits or activities that must be modified, revised, or closed, as applicable. An evaluation of permit conditions will likewise be performed to ensure that the facility maintains compliance with any post-closure conditions.

A decision to modify or extend the existing air permit will be made some time in the future.

### 4.2. NEW PERMITS

Any new permits required for the decommissioning will be obtained before decommissioning activities begin. A preliminary list of permits expected to be applicable to decommissioning and demolition activities is included below in Table 4-1. Compliance with permits, and local, state, and federal worker safety regulations will be maintained throughout decommissioning and demolition.

**Table 4-1 — Vega Baja Demolition-Related Permits**

ID	Agency	Permit or Approval
1	Federal Emergency Management Agency (FEMA), and any other involved federal agencies	NEPA Document Preparation and Approval (Categorical Exclusion expected)
2	United States Fish and Wildlife Services (USFWS)	Endangered Species Act (ESA) Section 7 Endangered Species Consultation or Determination of No Effect
3	State Historic Preservation Office (SHPO/OECH)	National Historic Preservation Act Consultation (Section 106)
4	Department of Natural and Environmental Resources (DNER)	Rule 141 - Environmental Impact Documentation
5	DNER	Asbestos/Lead Removal Permit
6	DNER	Unique Incidental Permit (PUI)

## 5. Pre-Demolition

### 5.1. METHODOLOGY FOR PROTECTIVE MEASURES

Phase 2 of the decommissioning work consists of pre-demolition activities and initiates site preparation and protective measures needed by Genera PR prior to the physical dismantling and demolition work. The objective of this section is to provide suitable site preparation work and protective measures, along with safe working conditions before any physical work of dismantling, demolition, and remediation work of the Subject Property starts. The protective measures for the Subject Property will focus on the following topics:

- Equipment Preparation for Demolition.
- Safe disconnection of existing site utilities and modifications to support the decommissioning activities.
- Identification and removal of hazards.
- Ground penetrating radar, safety, and physical site surveys
- Protective measures for preservation of key plant features.
- Decommissioning activities (pre-demolition work).

### 5.2. EQUIPMENT PREPARATION AND PROTECTIVE MEASURES FOR DEMOLITION

The following equipment and/or surveys shall be prepared / performed before any physical demolition work starts at the Subject Property:

- Ground Penetrating Radar, safety, and physical site surveys
  - Survey work shall be performed to identify the extent of underground features, safety hazards, and property boundaries.
- Stormwater curbs other protection
  - Stormwater drains shall be protected near the Work against debris, rust, sediment, and erosion caused by the demolition activities.
  - Protection measures, including, but not limited to, personnel barriers, concrete barricades, fire blankets, construction fencing, construction cones, wire rope, and debris.
- Main Power Transformer
  - To remain in place. A welded steel cage or scaffolding with welded wire mesh steel screen will be built around the disconnected transformer and securely anchored to concrete before

demolition activities begin to protect the main transformer equipment and auxiliaries from falling or storm/wind-blown debris. Protective bollards or concrete barriers are planned around the cage to prevent inadvertent damage from operating trucks, forklifts, cranes, or other construction equipment.

- Provisions for long term Main Power Transformer storage shall be initiated and put in place, including the application of construction power for the transformer to remain heated and free of water. The transformer auxiliary power feed shall be maintained to keep fans, pumps, and heaters operational with the control panel intact. Long-term preservation instructions from the manufacturer shall be implemented.
- Pad-Mounted Auxiliary Power Transformer
  - The Auxiliary Power Transformer will be disconnected and removed from the site for use elsewhere.
- Fuel Oil Storage Tank (276,000 gallons)
  - Storage tank contents to be emptied, residual liquids and sludge to be removed. The storage tank is to be decontaminated and surfaces shall be left clean of all substances. Tanks shall be certified gas free before any demolition work commences.
- Two (2) Fuel Oil Auxiliary Storage Tanks (10,000 and 15,000 gallons)
  - Storage tank contents to be emptied, residual liquids and sludge to be removed. The storage tank is to be decontaminated and surfaces shall be left clean of all substances. Tanks shall be certified gas free. The tank will be demolished, and metal recycled.
- Fuel Unloading Truck Station
  - Decontaminate, remove, and discard fuel unloading skid. Demolish fuel unloading truck station shelter.
- Emergency Diesel Generator
  - Disconnect and removal generator and associated feeder/wiring. Genera PR to relocate and repurpose.
- Gas turbines
  - Genera PR will conduct a field inspection of the Frame 5 gas turbine equipment to determine if any components or assemblies are repairable or salvageable for use on other Frame 5 units within the fleet. Genera PR staff, or other industry experts, will conduct this assessment prior to proceeding with Phase 3, Dismantling, Demolition, and Preparation for Restoration, and release a site inspection summary prior to proceeding to the next Phase of work. If needed, Genera PR will proceed with the safe removal of salvageable components.



### 5.3. SAFE DISCONNECTS AND MODIFICATIONS FOR SITE UTILITIES

The following site utilities will be disconnected and/or modified to suit construction activities by the Contractor:

- **Potable Water:** Potable water services will be disconnected from the power station back to the municipality's main isolation valve. The contractor will modify the downstream system as needed, and per local codes, to provide potable service to support the demolition activities.
- **Fire Water:** Fire water services will be disconnected from the power block station back to the main isolation valve or adjusted to suit the new fire water service. The Contractor will modify the downstream system as needed and per local codes, to provide fire water service for the demolition activities.
- **Sanitary Services:** Sanitary water services will be disconnected from the power block station, capped, protected, marked, and identified for future tie-ins. Temporary restroom facilities will be setup for the site in accordance with the decommissioning Contractor's needs.
- **Power Disconnect and Construction Power:** De-energization and verification of de-energization of all electrical utilities shall be made prior to the start of demolition work. The contractor shall confirm de-energization of equipment is suitable for the work to be performed and sign on to necessary LOTOs/Clearances. Genera PR's temporary electrical supply will be three phase 60-Hz, 120 and 208 volts. The contractor shall transform the power to 208/480V to energize Main Power Transformer heating and auxiliary equipment service, power lighting, and Stormwater Sump Pumps.

The following preparatory activities related to site security will be taken:

- **Site Security:** It is required of all personnel to cooperate with the Owner's site security personnel and comply with all Owner's necessary security rules, policies, or procedures.
  - General area security is ensured by fencing the Plant's perimeter and controlling access through the gate is managed by the Owner.
  - The Contractor shall take precautions against the loss of its material, tools, equipment and be responsible for the safety thereof.
  - In addition to other identification requirements listed herein, Contractor's employees or visitors shall be required to wear a company logo or other identification supplied by the Contractor. These logos shall always be visible.
  - Any structures that are not part of the demolition shall be considered as restricted areas.
  - All ladders, staging materials, equipment, and tools shall bear Contractor's identification mark and shall be checked by Contractor to ensure proper function before being carried into the site.

- No personal cars shall be permitted on the plant property beyond the designated parking lot at the gate, except for one personal vehicle for the superintendent. Contractor vehicles such as pickup trucks, etc., can enter the property grounds.
- All vehicles, personnel, storage containers, boxes, etc., may be searched by Owner upon leaving the station property.

## 5.4. PROTECTION AND HAZARD REMOVAL

The Subject Property will need an environmentally regulated material survey to identify and quantify universal waste, hazardous waste, and radiological waste. Survey to verify current local, state, and federal regulations prior to conduction of the survey. Regulated materials are removed/or controlled, included but not limited to the following:

- Hazardous chemicals, gases, and liquids to be removed and properly disposed of.
- Mercury containing instruments and equipment to be removed and properly disposed of.
- Oils and fuels to be removed and properly disposed of (if applicable).

The Contractor will complete the following activities prior to start of demolition activities:

- Secure all necessary permits and authorizations to conduct the demolition, disposal of the materials and coordinate with disposal sites (landfills) to receive the material. Perform abatement of existing facilities and equipment, which may include the following actions:
  - a. Asbestos-containing material (ACM), universal waste, hazardous waste, and any other regulated waste to be removed and properly disposed of offsite (as applicable).
  - b. Friable and nonfriable insulation on mechanical systems and equipment, piping, heating, ventilation and air conditioning, electrical components and equipment, switchgear protection and electrical conduit to be removed, abated, and properly disposed of offsite.
  - c. Lights, ballasts, and universal waste (e.g., mercury-containing equipment, radiation point sources) will be removed and disposed of offsite.
- Begin decontamination process to the extent possible by removal of all remaining liquids, gas and solids from piping, tanks, vessels, equipment, and components. Decontamination will involve accessing or opening the systems to allow liquid, gas, and solids to be removed.
- Take soil / ground water samples prior to any demolition activities such as excavation to remove underground equipment or structures.
- Residual waste will be managed, stored, transported, and disposed of in accordance with local, state, and federal regulations.

- Develop a detailed abatement plan for materials identified in the environmental regulated materials survey (if applicable) that will address methodologies and procedures, site preparation, required containment setup, engineering and work practice controls, PPE, and worker exposure assessment.
- Locate underground structures and utilities that could present a safety hazard during demolition activities or cause service interruptions if damaged. The use of Ground Penetrating Radar equipment is required to aid in the discovery of underground equipment due to the lack of as-built drawings and other information. Features shall be marked, and the extent of discoveries shall be utilized to finalize estimates for their removal, as necessary for the decommissioning work and intended future use.
- Conduct pre-demolition engineering survey by a competent person per OSHA 29 CFR 1926.850 (a) prior to start of demolition activities. The purpose of the survey is to determine the condition of framing, floors, and walls and possibility of unplanned collapse of any portion of the structure. Adjacent buildings and structures where employees may be exposed shall also be similarly checked.
- Measures, including temporary bracing and shoring of walls and floors, shall be taken to protect workers and any adjacent structures.
- Develop Environmental, Health, Safety and Security Plan. This includes, but is not limited to:
  - a. Provisions for Hot Work
  - b. Air Monitoring Plan
  - c. Noise Monitoring Plan
  - d. Environmental Protection Plan

## 5.5. TEMPORARY FACILITIES AND PREPARATION WORK

The demolition contractor chosen for each phase will be responsible for the supply, installation, provision, maintenance, repair and final removal of all temporary facilities and utilities, necessary for full and complete performance of the work. Such items include, but are not limited to:

- Ensure all permits and signage are in place.
- Coordination of all transportation services, including proper transport and disposal of all hazardous materials and regulated waste materials not already removed by Genera PR personnel.
- Connections to and disconnections from water supply including distribution supply lines and storage facilities.
- Temporary facility and laydown area, including the maintenance of contractor's laydown storage and work areas, as well as roads within such areas.

- The provision, operation and maintenance of sanitary systems, industrial systems, storm drainage and utility sewage systems.
- Adequate storage of materials tools and equipment.
- Construction power.
- Temporary facility area power and lighting.
- Potable water.
- Compressed air and gases.
- Material handling and rigging.
- Supply, erection, maintenance and dismantling of scaffolding and/or other means of access to the work.
- Weather protection of the work and any methods required to allow continuation of the work during periods of inclement weather.
- Small tools and all standard expendable or consumable construction items and supplies.
- Personal protective equipment.
- Permits for temporary facilities.
- First aid facilities.

Stormwater runoff management controls are required to prevent surface water from exiting the work area. Before beginning demolition activities, the existing stormwater receptors will be protected to prevent release into them, and any other applicable demolition-related water. The Contractor should plan for demolition activities that will require water for dust control.

#### 5.5.1. Decommissioning Activities (Pre-Demolition)

Genera PR will complete the following decommissioning activities prior to the start of demolition:

- Execute Community Engagement and Communication plans as outlined in Section 4 of this report.
- Notify Grid Operator (LUMA) of upcoming decommissioning activities.
- Prepare and issue a Request for Proposal (RFP) for solicitation of bids to perform the dismantling and demolition of the Subject Property. Prequalification of contractors should include a review of contractor experience, resource availability, safety, and environmental compliance records. The contracts for demolition services will be signed following a rigorous evaluation process and after the decommissioning plan is approved.
- Perform a safe shut down of the plant. Typical activities include, but are not limited to:

- a. Facility and equipment are isolated from the transmission/distribution system by opening of breakers and removal of links.
- b. All electrical stored energy removed. (i.e., station batteries disconnected and removed)
- c. All mechanical energy removed.
  - Piping systems depressurized, drained, purged and cleaned (as required).
  - Aboveground storage tanks drained.
- d. Install required isolation devices and facilities as required to prove absence of energy. The systems will be secured through lockout/tagout procedures.

## 6. Dismantling, Removal, and Demolition

### 6.1. METHODOLOGY FOR DISMANTLING, REMOVAL, DEMOLITION, AND PREPARATION FOR RESTORATION

The objective of Phase 3 work is to provide a roadmap for the dismantling, removal, and demolition of the Subject Property in compliance with applicable laws and regulations in effect at the time of this report.

#### 6.1.1. Demolition

After all necessary pre-demolition activities have been completed, dismantling, removal, and demolition activities can start. Refer to Figure 6-1 for a site legend regarding dismantling, removal, and demolition.

**Scope:** Removal and demolition of materials, equipment and structures located above the top of concrete (TOC).

**End Use:** The property will retain concrete slabs, foundations, parking areas, and underground structures to avoid the need for temporary measures for erosion control, containment, and potential treatment of runoff water during the interim period.

Figure 6-1 — Vega Baja Site Legend





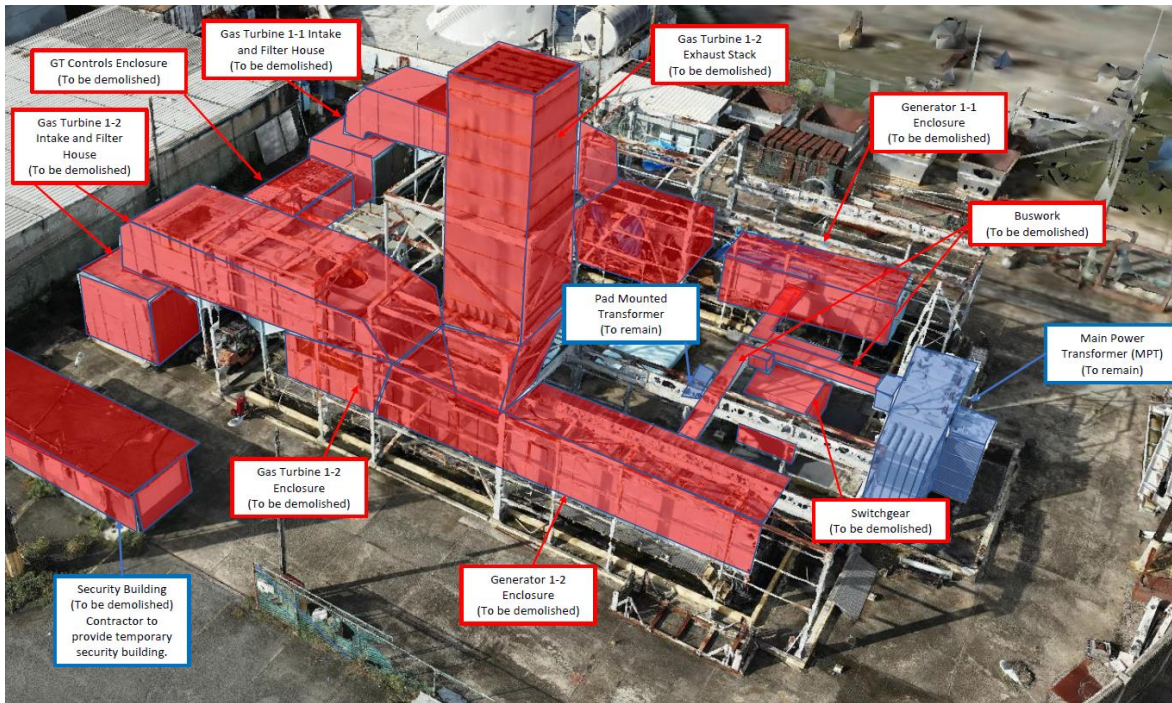
### 6.1.1.1. Scope of Work

The scope of work for dismantling, removal, and demolition is summarized in Table 6-1 and in Figure 6-1 through Figure 6-6 below.

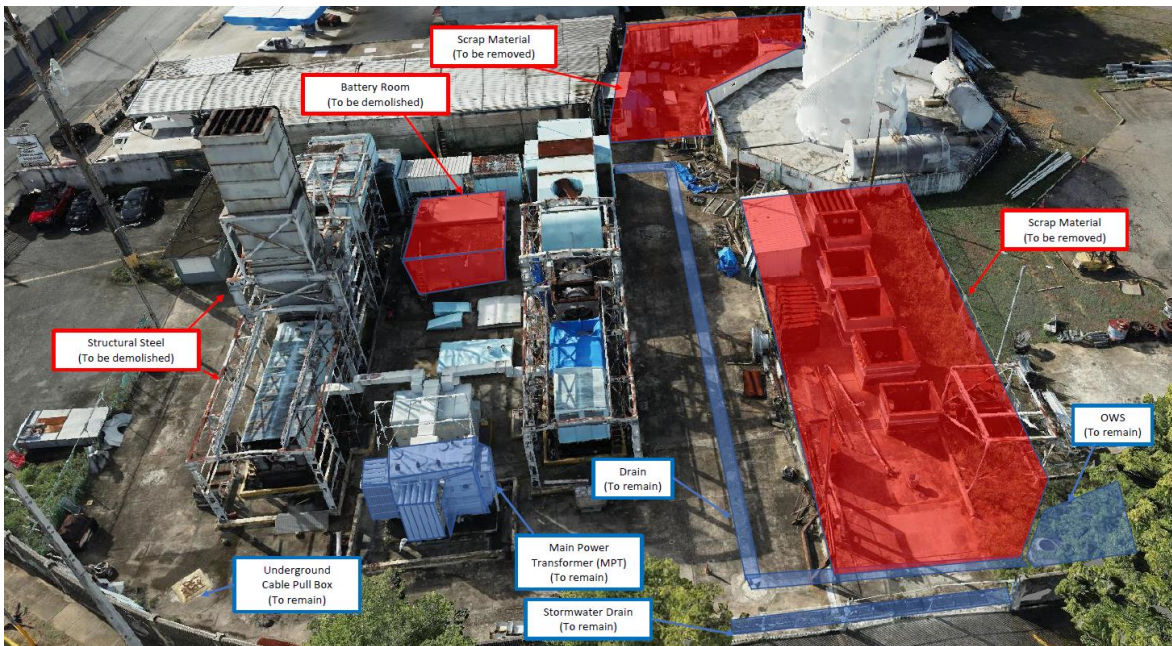
**Table 6-1 — Summary of Phase Above Ground Demolition Scope.**

Item	Equipment/Structure	Scope
1	Gas Turbine Controls Enclosure	To be removed. Structure to be demolished to top of concrete level (TOC).
2	Main Power Transformer (MPT)	To remain in place.
3	Switchgear	Equipment to be removed and discarded. Enclosure to be demolished to TOC level.
4	Emergency Diesel Generator (EDG)	To be relocated
5	Pad Mounted Auxiliary Transformer	To be relocated.
6	Battery Room	Batteries to be removed and recycled. Structure to be demolished to TOC level.
7	Fuel Oil Storage Tank (276,000 gallons)	To be demolished.
8	Two (2) Auxiliary Storage Tanks (10,000 and 15,000 gallons)	To be demolished.
9	Fuel Unloading Truck Station	To be demolished.
10	Telecommunications Steel Pole	To be removed. Genera PR to coordinate removal and relocation in future phase of the project.
11	Administration Building (2-Story Building)	To be demolished.
12	Wheel Mounted Trailer	To be removed.
13	Security Building	To be demolished. Temporary air-conditioned security building with sanitary facilities to be provided by the contractor.
14	Plant Area Lighting	To be demolished.
15	Underground Cable Vaults	Cut and abandon cables. Underground vaults and conduits to be demolished during Phase 2.
16	Property Fence	To remain in place.

**Figure 6-2 — Plant Materials, Equipment and Structures to be Demolished**

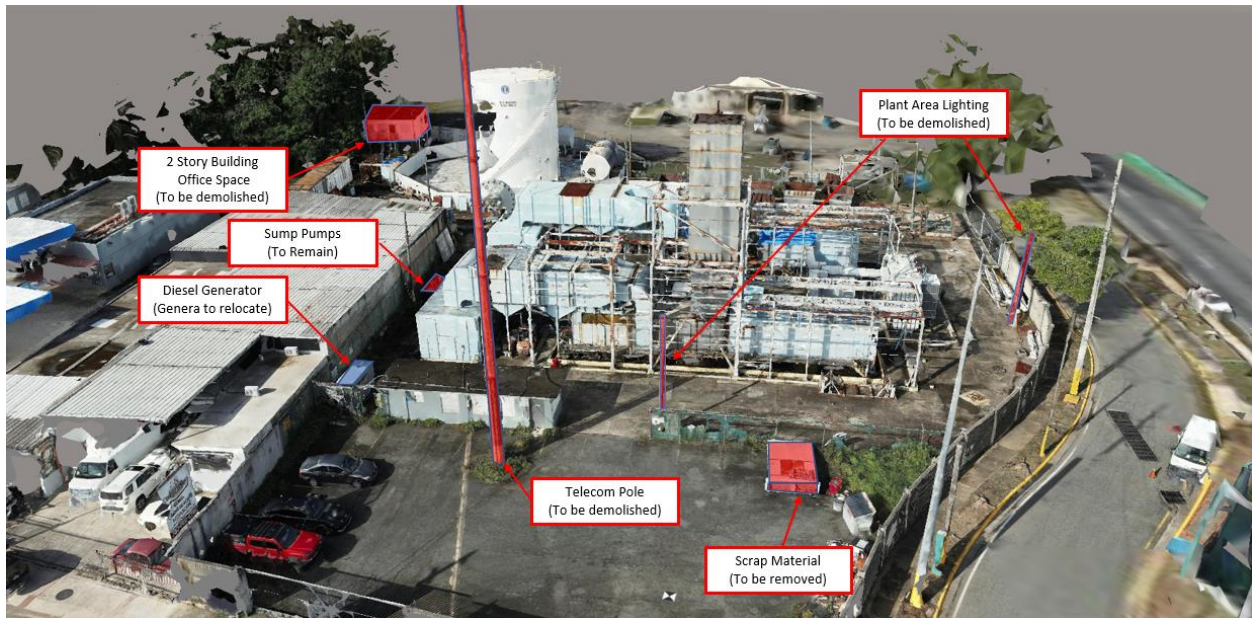


**Figure 6-3 — Plant Materials, Equipment and Structures to be Demolished**

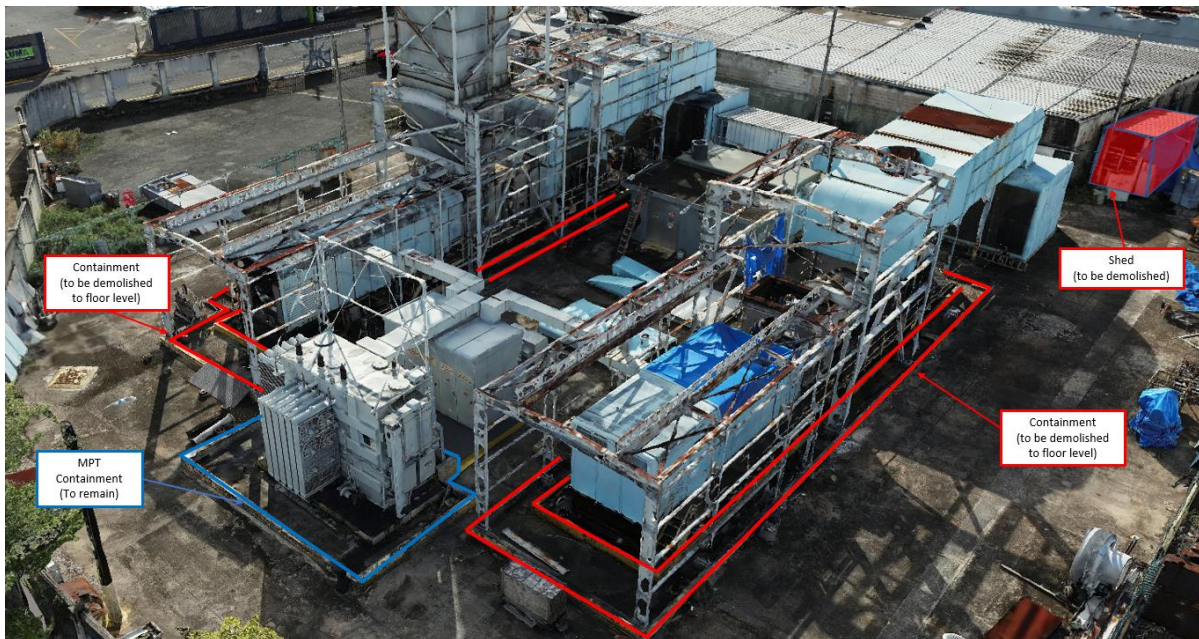




**Figure 6-4 — Plant Materials, Equipment and Structures to be Demolished**

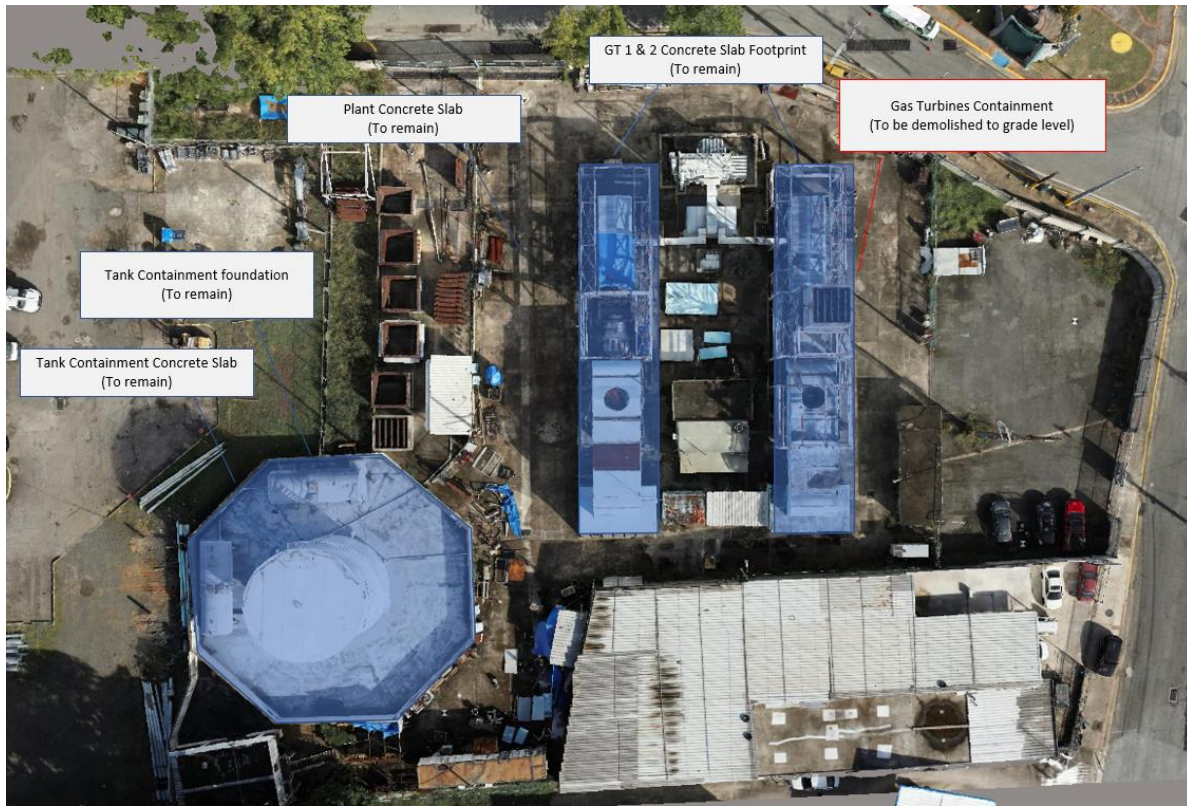


**Figure 6-5 — Plant Materials, Equipment and Structures to be Demolished**





**Figure 6-6 — Plant Materials, Equipment and Structures to be Demolished**



## 6.2. DECONTAMINATION, WASTE DISPOSAL AND RESTORATION

### 6.2.1. Site Restoration

Phase 3 of the work includes site restoration activities, primarily consisting of the following:

- a. The project site will be cleaned of any materials and debris left over from demolition activities.
- b. Stormwater runoff management controls required to prevent surface water from exiting the work area shall be removed after completion of demolition activities and cleanup of the project site areas.
- c. If evidence of contamination has been identified, environmental subcontractors will be engaged to formally investigate the type and extent of contamination, propose remediation activities and to work with the relevant agencies to execute those activities.
- d. Restoration of the surface can begin in outer areas after remediation, if necessary, and can be started in the power block area as soon as the above and below grade buildings, structures, and equipment are removed, the area is backfilled, and is safe for surface grading.
- e. Temporary areas developed by the contractor shall be re-graded to maintain storm water runoff patterns. The entire disturbed site should be graded, covered with a nominal 6" to 12" layer of clean soil, compacted to ensure positive drainage and restored to a condition that matches with the original landscape.
- f. All contractor equipment and temporary structures shall be removed from the project site.

### 6.2.2. Potential Contaminants

This section provides a high-level description of the major decontamination, hazardous waste disposal, and remediation activities that are potentially required for the demolition and renovation of the 1.3-acre Vega Baja Power Station. Additionally, the following discussion takes asbestos-containing materials (ACM) and lead-based paint into consideration.

The USEPA Asbestos and the NESHAP regulations (40 CFR Part 61, Subpart M) specify asbestos work practices for demolition and renovation of structures, installations, and buildings, excluding residential buildings that have four or fewer dwelling units. The federal and the related state regulations require notification of the Department of Natural Resources (DRNA) and appropriate permits before any demolition, or before any renovations of buildings that could contain a certain threshold amount of asbestos or asbestos-containing material. Contractors testing for ACM and handling ACMs must be approved or certified by the DRNA.

The Occupational Safety and Health Administration (OSHA) has regulations that protect workers involved in construction activities from the hazards of lead exposure. The OSHA Lead Standard establishes a

permissible exposure limit and includes requirements that employers use engineering controls and work practices, where feasible, to reduce worker exposure, provide protective clothing and, where necessary, respiratory protection accordance with 29 CFR 1910.134, and enroll employees exposed to high levels of lead in a medical surveillance program. Employees are required to observe good personal hygiene practices, such as washing hands before eating and taking a shower before leaving the worksite. Permits from the DRNA may also be required for lead-based paint mitigation activities.

### 6.2.3. Asbestos and Lead Based Paint

Vega Baja began operating as an electric power generating station in 1972. Given the age of the facility, it is possible that existing equipment has been coated in lead-based paint or is composed of ACM, as lead-based paints and asbestos were not banned until 1978 and 1989, respectively. The equipment and structures scheduled to be decommissioned or demolished and possible contaminants of concern are shown below in Table 6-2.

**Table 6-2 — Contaminant Profile of Equipment Scheduled for Demolition**

Equipment Type	Description	Contaminants of Concern (COCs)
15,000-gallon Auxiliary Storage Tank	Non-operational diesel fuel tank	Lead-based paint
10,000-gallon Auxiliary Storage Tank	Non-operational diesel fuel tank	Lead-based paint
276,000-gallon Storage Tank	Non-operational diesel fuel tank	Lead-based paint
Aboveground Fuel Oil Piping	N/A	ACM
Secondary Containment	Secondary containment for fuel oil tanks and beneath gas turbines and generator enclosures	Lead-based paint
21 MW Gas Turbine (GT) 1-1	General Electric Frame 5000 single-shaft GT	ACM
21 MW GT 1-2	General Electric Frame 5000 single-shaft GT	ACM
GT Exhaust Stack	Connected to GT and approximately 30' in height	ACM
Fuel Unloading Truck Station	N/A	Lead-based paint
Oil-Water Separator	N/A	N/A
Security Building	N/A	ACM and Lead-based paint
GT Controls Enclosure	Houses the controls equipment for both GTs	ACM and Lead-based paint

Equipment Type	Description	Contaminants of Concern (COCs)
Battery Room	N/A	ACM and Lead-based paint
Wheel Mounted Trailer	N/A	N/A
Storage Area	N/A	N/A
15KV Switchgear and Electrical Bus Duct	Includes any associated underground feeders and wiring	ACM
13.2KV/480V Pad-Mounted Distribution Transformer	Includes any associated underground feeders and wiring	ACM
Structural Steel	N/A	Lead-based paint
Scrap Material	N/A	ACM and Lead-based paint
Curbs and painted concrete pavement	N/A	Lead-based paint
Steel stairs and railings	N/A	Lead-based paint

Identification and removal of lead contamination may be required before workers can safely begin equipment and building dismantling and demolition activities at the Subject Property. Any flakes of lead paint must be removed prior to worker activities, and the area should be monitored periodically for new accumulations during dismantlement. Genera PR can either treat all paint and painted materials as lead-based paint and take all required actions to protect workers and to dispose of the materials as lead-contaminated materials, or undertake a testing program to determine if all, some, or none of the painted materials contain lead.

In addition to lead abatement, the removal of ACM is required for worker safety prior to the dismantling and demolition of equipment and buildings at the Subject Property. The ACM abatement effort should begin with a survey of ACM at the Subject Property to estimate the scope of the task. ACM must be evaluated prior to disposal, and the removal of ACM should be conducted by a qualified contractor. Additionally, oversight of asbestos abatement compliance and air monitoring should be conducted by a qualified contractor or third party.

Lead-based paint and/or ACM testing is recommended for the equipment and structures listed in Table 6-2. If lead-based paint and ACM are identified through analytical testing, licensed lead-paint handlers and ACM handlers should be used for the removal and disposal of equipment and buildings slated for demolition and decommissioning. Both lead-based paint and ACM removal can be scheduled to occur prior to dismantling activities in affected areas rather than being completed at one time for the entire facility. Testing results

from lead-based paint and/or ACM will be used to obtain the PUI (Permiso Unico Incidental). This permit is required to guarantee compliance with applicable regulations.

#### 6.2.4. Polychlorinated Biphenyls (PCBs)

Among their many uses, PCBs were used in transformers, hydraulic oils, cutting oils, capacitors, and light ballasts. The USEPA banned the manufacture of PCB in 1979. During the 1980s, electric utilities were required to remove PCBs from transformers by replacing or reconditioning them. As required by the USEPA through a Consent Decree, between 1990 and 2000, PREPA completed sampling and analysis for PCBs within the oil contained in applicable transformers that were connected and in-service. As part of the Consent Decree, PREPA retired all oil-filled transformers from service that contained a concentration above 49 parts per million of PCB ("Regulated Concentration," according 40 CFR Part 761).

PREPA finished these activities by 2001. Based on these prior remediation activities, further PCB testing on existing equipment that is to be decommissioned is not warranted. See Section 5.2.10, Polychlorinated Biphenyls, of the Phase I Environmental Site Assessment completed in November 2023 for the Subject Property for more information. However, planned soil sampling would include analysis for PCBs if any leaks occurred from PCB-containing equipment in the past. Further details about the planned sampling are included Section 6.2.5.

#### 6.2.5. Soil and Groundwater

The USEPA oversees the standards for contaminated site cleanups across the United States, including territories like Puerto Rico, through programs such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, and the Resource Conservation and Recovery Act (RCRA). These programs have provisions for corrective actions to remediate or manage contaminated soils. Under the RCRA, facilities that treat, store, or dispose of hazardous waste are required to investigate and remediate if contamination is found. This process involves setting corrective action objectives based on risk assessments, which consider factors such as the level of contaminants present, the potential for human exposure, and the characteristics of the local environment.

The Puerto Rico Department of Natural and Environmental Resources (DNER) is responsible for establishing and enforcing environmental standards, including those for soil remediation. The requirements for soil remediation may vary depending on the specifics of the contaminated site, such as the type and concentration of contaminants, the land use, and the potential for human exposure. The Phase I Environmental Site Assessment completed in November 2023 for the Subject Property identified the



following environmental conditions as recognized environmental conditions (RECs) in connection with the Subject Property:

- The Subject Property has operated as an electric power generating station for over 50 years. Due to the longevity of operations and limited historical records and regulatory oversight throughout the entire life of the power station, the historical operations at the Subject Property are considered a REC due to the presence of hazardous substances or petroleum products at the Subject Property under conditions that pose a material threat of a release to the environment.
- During the site reconnaissance, approximately five monitoring wells were identified at the Subject Property. PREPA could not provide further information related to the motive, extent, purpose of this network, or to a release event associated with it, source material, or released quantities that would result in the installation of said wells. This is considered a REC in connection with historical potential for soil and groundwater impacts to the Subject Property that warrants further investigation.

Based on the RECs identified above, a Geotechnical Investigation will be conducted at the Subject Property and will include the collection of soil samples for environmental testing. Analytical testing for samples collected shall include:

- a) VOCs: EPA SW-846 Test Method 8260D
- b) SVOCs: EPA Method SW-8270E
- c) PCB testing: EPA Method SW-846 9078
- d) Pesticides: EPA Method 8081
- e) TCLP Metals: EPA SW-846 Test Method 1311, Method 6020B (SW-846) and EPA Method 7473 (SW-846).

The results of the soil and groundwater sampling and analysis can be used to determine the appropriate remedial activities and waste disposal requirements for the site. The results of the soil and groundwater sampling and analysis should be evaluated by a person meeting the qualifications of an Environmental Professional / Phase II Assessor as provided Section 3.1.32 of ASTM Standard Practice E1903, and possessing sufficient education, professional training, and relevant experience to conduct or be in responsible charge of environmental investigations and other activities in accordance with the ASTM practice, and to interpret the resulting data to develop opinions and conclusions regarding the presence of target analytes in environmental media in connection with the property in question.

## 6.2.6. Hazardous and Non-Hazardous Waste Handling

All waste materials must be classified, managed, and disposed of according to applicable regulations. This includes both hazardous and non-hazardous waste. Hazardous waste, characterized by its flammability, reactivity, corrosivity, or toxicity, should be identified and segregated to prevent further contamination. It is

packaged according to regulatory standards and stored in designated secure areas, awaiting disposal by licensed hazardous waste handlers. Non-hazardous waste, while not posing immediate health or environmental risks, is also carefully managed to minimize its impact.

Prior to the initiation of decommissioning and demolition activities for the equipment and structures detailed in Table 6-2, it is imperative to engage certified professionals specializing in lead-based paint and ACM. These experts should conduct comprehensive surveys to assess the extent of any potential contamination and subsequently devise protocols to facilitate the secure and compliant removal and disposal of such hazardous substances.

If evidence of contamination is found, environmental subcontractors will be engaged to formally investigate the type and extent of contamination, propose remediation activities and to work with the relevant agencies to execute those activities.



## 7. Decommissioning Budget

### 7.1. DECOMMISSIONING BUDGET SUMMARY

Project decommissioning will incur costs associated with removal of facilities and disposal of components not recycled or sold for salvage, including materials which will be disposed of at a licensed facility, as required. The purpose of the estimate is to provide capital cost information for project planning and budgeting evaluations. It is expected that the estimate be used in a manner where the end usage takes into consideration the estimate's classification and accuracy of the represented costs.

Appendix C summarizes the estimates associated with the major activities of the Vega Baja Decommissioning Plan. A more detailed estimate is provided in Appendix D. The estimated decommissioning budget is expected to be entirely federally funded.

**Error! Reference source not found.** contains proposed monthly expenditure budgets and cash flow projections during which the demolition activities are anticipated to take place. Appendix E does not include the contingency allowance of 30% (\$595,602) for potential delays and cost overruns due to unforeseen environmental issues, such as the discovery of hazardous materials or contamination (i.e., lead, asbestos, water contamination, fuel spills, etc.).

### 7.2. BASIS OF DECOMMISSIONING COST ESTIMATE

The cost estimates were developed utilizing engineering scope information. They are primarily based on experience on similar projects, contractor quotes, conceptual design layout and configuration, equipment and system component sizing, and material take-offs. Detailed engineering has not been performed to firm up the project details, and specific site characteristics have not been fully analyzed. Allowances have been assigned where necessary to cover issues that are likely to arise but are not clearly quantified at this time.

Based on a 1% to 15% maturity level of project definition deliverables and estimating methods used, this estimate can be categorized as a Class 4 estimate with a probable accuracy range of -15% to -30% on the low end and +20% to +50% on the high end, as established by the Association for the Advancement of Cost Engineering (AACE) International. The +/- values represent typical percentage variation at an 80% confidence interval of actual costs from the cost estimate after application of contingency (typically to achieve a 50% probability of project overrun versus underrun) for given scope. Depending on the technical and project deliverables (and other variables) and risks associated with each estimate, the accuracy range

for any estimate is expected to fall into the ranges identified, although extreme risks can lead to wider ranges.

### 7.2.1. Estimate Development Methodology

The methodology used for developing the cost estimate was a mix of semi-detailed unit costs with assembly level line items and detailed unit cost with forced detailed takeoff (i.e., detailed takeoff quantities generated from preliminary drawings and incomplete design information). As such, it can be said that this estimate is generated using a deterministic estimating method based on the quantity and size of equipment (e.g., type of equipment, the number of foundations, linear feet of cable) and through cost estimates provided by contractors (e.g., lead & asbestos testing). Stochastic methods were also used (Stochastic means statically analyzed but not precisely predicted) for quantification of the materials based on representative projects of this type and scaled from aerial photos for quantification of the materials onsite if quantity information (e.g., miscellaneous items, electrical equipment) was unavailable.

The inventory of plant equipment, materials, and other items was developed based on review of drawings of the facility. This information was used with unit cost factors based on industry data and experience to estimate the demolition costs. Unit cost factors for concrete removal, steel removal, and other tasks were developed from labor and material cost information. No scrap value was assumed for any equipment.

The cost estimate considers all known scope of physical facilities to decommission the facility. There are no known intentional omissions. The decommissioning cost estimate provides a conceptual estimate to dismantle and remove the structures and equipment from the site and restore the site to near-greenfield conditions. The basis for the cost estimate is provided in the following sections.

### 7.2.2. General Assumptions

Given the facility constraints, some assumptions and allowances have been made, as described below, since detailed engineering analysis was not performed to capture all details and site-specific characteristics. Listed below is a summary of the main scope of facilities included in the decommissioning estimate:

- All above-ground structures and buildings will be demolished along with the equipment, such as those described above in Section 6, except the main power transformer.
- Dismantle and remove all mechanical and electrical equipment.
- Remove any items and obstacles, including concrete foundations, conduits, and cables.
- Loading, hauling, and disposal costs for removal of non-recycled materials by demolition contractor.

The decommissioning cost estimate assumes the following:

- The demolition will be performed by a demolition contractor who is responsible for providing adequate staff and equipment to complete the dismantling in a safe manner.
- Stores, spare parts of value, laboratory equipment, office furniture, etc., will be removed by the Owner prior to dismantlement.
- The Owner will remove all chemical and hazardous materials prior to dismantlement.
- All fuel oil will be consumed or removed prior to dismantlement.
- All electrical equipment and wiring are de-energized prior to start of dismantlement.
- No extraordinary environmental costs for demolition have been included.
- FEMA funded permitting expenses are not included (discussed in Section 4).
- Asbestos and lead paint abatement costs are not included.
- Oils used in the transformers will be removed by the Owner.
- All items above grade will be demolished including concrete foundations, conduits, and cables.
- All foundations and pavement will be removed.
- The extent of required underground demolition is unknown. At this time, foundations have been taken to grade. Subsurface features may be reevaluated after performing ground penetrating radar surveys to determine additional demolition work that may be required.
- All non-recyclable demolished materials are to be disposed offsite in a licensed landfill.
- No credit for the scrap value of metals is included and any such value is assumed to be by the demolition contractor.
- No resale of equipment or material is included.
- No site restoration or landscaping is included.

The basic presentation of the overall estimate hierarchy follows:

- Direct Costs
- General Conditions Costs
- Project Indirect Costs
- Contingency
- Escalation

Within the direct cost group, the costs are segregated into the following five sub-categories:

- Subcontract Cost
- Material Cost
- Equipment Cost
- Labor Cost
- Construction Equipment Cost

### 7.2.3. Direct Costs

The direct field costs represent the permanently installed facilities and include subcontract costs, material costs, process equipment costs, labor costs and construction equipment costs. Each line item in the estimate may have any combination of these cost categories. The process equipment and material cost categories include the pricing for permanently installed equipment, vendor catalogs, industry publications and other related projects. Construction equipment costs include costs for rental of all construction equipment, fuel, oil, and maintenance. Equipment operators are included with direct labor costs.

Subcontract costs included in the estimate are all inclusive costs. It includes equipment, building, batteries, fence, and concrete hauling and waste disposal costs, geophysical survey costs, removal, and cleaning of fuel in fuel oil storage tanks, and permit costs.

### 7.2.4. Labor Wage Rates

Craft labor rates for the cost estimate are based on the prevailing wages for Puerto Rico as published in *R.S. Means Labor Rates for the Construction Industry*, 2024 Edition. These prevailing rates are representative of union or non-union rates, whichever is prevailing in the area. Costs have been added to cover social security, workers' compensation, and federal and state unemployment insurance. The resulting burdened craft rates were then used to develop typical crew rates applicable to the task being performed.

### 7.2.5. Labor Work Schedule and Other Costs

The labor estimate is based on a 40-hour workweek with no per diem or other labor incentives. Labor supervision costs were included as an additional pay over that of a journeyman. An allowance (show-up time) is included if workers show up and are then sent home due to inclement weather or some other reason (estimated to be 2% of labor).

## 7.2.6. General Conditions Cost

Allowances included in the cost estimate as a percentage of the direct costs are noted for the following:

- Additional Labor Supervision (an additional 6% of direct labor compensation will be allocated for foremen/supervisors) and show-up time (~2% of direct labor).
- Construction Management (estimated to be 6.65% of labor, material, equipment, and subcontracts).
- Field Office Expenses
- Safety<sup>1</sup>
- Temporary Facilities<sup>1</sup>
- Mobilization / Demobilization<sup>1</sup>
- Decommissioning Contractor Legal Expenses / Claims<sup>1</sup>
- Small Tools & Consumables<sup>1</sup>
- General Liability Insurance (estimated to be 1% of labor cost)
- Construction Equipment Mobilization / Demobilization (estimated to be 10% of equipment cost)
- Freight on Material (estimated to be 5% of material cost)
- Contractor's General and Administrative Costs (estimated to be 7.84% of labor, material, equipment, and subcontracts)
- Contractor's Profit (estimated to be 11.22% of labor, material, equipment, and subcontracts)

## 7.2.7. Indirect Expenses

Project indirect costs are Genera PR costs for a variety of preparation and support activities, including the preparation of a specification for the demolition project and performing the items listed below as Owner's costs. In the electric power industry, the process of closing a power plant is sometimes referred to by the steps of the process, such as "decommissioning, decontamination, and demolition." Some publications include "deactivation" as one of the steps and refer to them as the "four Ds" of plant closure. In this report, the decommissioning and decontamination steps refer to activities performed by Genera PR prior to a contractor's arrival onsite to demolish and complete the overall process. Genera PR executes the activities that include deactivating the plant and disconnecting it from the grid. Hazardous material and environmental evaluations, safety planning, and coordination with the demolition contractor are completed by Genera PR during decommissioning and decontamination.

## 7.2.8. Escalation Rates

Escalation rates are excluded from this cost estimate.

### 7.2.9. Contingency

The decommissioning plan includes three (3) months and a 30% contingency allowance to address potential delays and cost overruns due to unforeseen environmental issues, such as the discovery of hazardous materials or contamination (i.e., lead, asbestos, water contamination, fuel spills, etc.) that were not identified prior to the commencement of the project. These caveats will help safeguard against financial penalties and ensure that any delays caused by such unforeseen environmental issues are managed in a fair and reasonable manner

### Contract Strategy

The contract strategy selected to mitigate the risks of budget overruns is a firm lump sum price. The decommissioning services timeline includes an estimated time for the removal of asbestos containing materials (ACM) and lead-based paint (LBP). The existence of ACM and LBP and other hazardous materials has not yet been fully determined. Determination of the existence of these materials will be made before site work begins. The reason for this activity is to consider the estimated decommissioning and demolition work, related to hazardous materials and other labor, where time duration and abatement related costs may vary significantly.

## 7.3. COST ESTIMATE SUMMARY

The decommissioning cost estimate summary for the Subject Property is available in Appendix D. All costs are in 2024 U.S. dollars and is subject to the same adjustments and exclusions described in Section 10.1 of this report.

## 8. Health, Safety, Security, and Quality Management

### 8.1. GENERAL REQUIREMENTS

#### 8.1.1. Staffing Requirements

The demolition contractor shall designate staff to maintain health, safety, security, and quality management. The Owner shall plan appropriate staff to monitor and support these activities, as appropriate for the services required.

#### 8.1.2. Health and Safety Plan

The Health and Safety Plan will be prepared by the selected demolition contractor as part of the work plan documents. The Health and Safety Plan provides safe work practices and control measures used to reduce or eliminate potential hazards. These practices and controls are to be implemented by the party in control of either the site or the hazard.

Contractors and employees must remain aware of the hazards affecting them regardless of who is responsible for controlling the hazards. The contractor is expected to perform the applicable pre-emergency planning tasks before starting field activities and will also coordinate emergency response with local emergency-service providers for all onsite parties and the facility, as appropriate.

These planning tasks include:

- Contractor will establish, publish, and enforce a site-specific safety program that meets federal, state and Genera PR requirements.
- Contractor will provide worker orientation, supply, and maintain contractor and worker-supplied safety equipment, and provide and maintain adequate equipment related to fire protection within work zones.
- Contractor will perform jobsite administration including submittals, record keeping, licenses, safety, drug and alcohol testing, medical surveillance programs, and all other requirements to maintain a safe and efficient project.
- Contractor will take appropriate measures to avoid accumulating dust in work areas. Contractor will be responsible for keeping haul roads and work areas watered to prevent dust from accumulating on the plant facilities during the contract.
- Contractor is responsible to notify Genera PR if contact is made with any hazardous materials that may impact the safety of employees or that may provide an environmental hazard. Contractor is not to proceed with work until authorized.

- Review the facility emergency and contingency plans where applicable. Determine what onsite communication equipment is available (e.g., two-way radio, air horn).
- Determine what offsite communication equipment is needed (e.g., nearest telephone, cell phone).
- Confirm and post emergency telephone numbers, evacuation routes, assembly areas, and route to hospital; communicate the information to onsite personnel.
- Post “Exit” signs above exit doors, and post “Fire Extinguisher” signs above locations of extinguishers in the Field Trailers. Keep areas near exits and extinguishers clear.
- Review changed site conditions, onsite operations, and personnel availability in relation to emergency response procedures.
- Where appropriate and acceptable to the client, inform the emergency room, ambulance, and emergency response teams of anticipated types of site emergencies.
- Designate one vehicle as the emergency vehicle; place hospital directions and map inside; keep keys in ignition during field activities.
- Take inventory and check site emergency equipment, supplies, and potable water.
- Communicate emergency procedures for personnel injury, exposures, fires, explosions, and releases.
- Rehearse the emergency response plan before site activities begin, including driving route to hospital.
- Brief new workers on the site safety and emergency response plan.
- Contractor will establish, publish, and enforce a site-specific safety program that meets federal, state, and Genera PR requirements.
- Provide training, personal protective equipment (PPE), and emergency response procedures to all personnel involved in the project.
- Conduct regular inspections, audits, and reviews to monitor compliance with HSSEQ standards and identify areas for improvement.
- Immediately inform Genera PR in the event of a near miss, accident, injury, incident, fire, or property damage. A near-miss, or incident report shall be completed once the near-miss or incident is under control and before the end of the shift. A copy of the report shall be routed to the Genera PR Safety Coordinator.

## 8.2. AIR MONITORING PLAN

The Air Monitoring Plan (AMP) will be implemented to ensure that air emission control measures used onsite are effective, and to monitor the air quality concentrations of the pollutants resulting from the proposed demolition project.



### 8.3. NOISE MONITORING PLAN

The Noise Monitoring Plan (NMP) will address project-specific information for noise control relating to the field activities at the Vega Baja. The purpose of the NMP is to provide guidelines and procedures for noise control and monitoring on and around the Vega Baja site while demolition activities are in progress. Demolition activities will include demolition, excavation, grading, decontamination, waste treatment, waste hauling, and restoration, all of which will generate noise and require monitoring. Noise will be monitored, and engineering controls implemented as required. The proximity of adjacent homes and business requires that noise controls be implemented, in accordance with existing noise restrictions. These controls might include limiting work during certain hours, days, or months as stated by Regulation of the environmental Quality board for the control of Noise Pollution.

### 8.4. ENVIRONMENTAL PROTECTION PLAN

The Environmental Protection Plan (EPP) presents information regarding the environmental management program to be conducted for this project. The purpose of this plan is to present the environmental regulatory requirements for the construction activities. The EPP will help ensure that activities associated with the environmental management program at the facility are conducted in a systematic and well-documented manner. The EPP also details environmental compliance procedures and waste management, as well as regulatory, procedural, and training requirements associated with conducting demolition activities.

### 8.5. QUALITY CONTROL PLAN

The Quality Control (QC) Plan will be required to establish the basic objectives of the Contractor's Quality Control System. These objectives include the following:

- Ensure that all work adheres strictly to the requirements of the contract and governing agencies where the work is being performed.
- Maintain QC procedures to ensure that tasks performed will comply with the contract.
- Prevent deficiencies through preconstruction quality control coordination.
- OSHA CFR 29 1926.850 - Preparatory operations.

Prior to permitting employees to start demolition operations, an experienced professional shall conduct an engineering survey. The survey will examine the structure to determine the condition of the framing, floors, and walls, and determine the possibility of an unplanned collapse of any portion of the structure. All adjacent structures where employees may be exposed shall also be similarly checked. The employer shall have in writing evidence that such a survey has been performed:

- 1926.850(b) When employees are required to work within a structure to be demolished which has been damaged by fire, flood, explosion, or other cause, the walls or floor shall be shored or braced.
- 1926.850(c) All electric, gas, water, steam, sewer, and other service lines shall be shut off, capped, or otherwise controlled, outside the building line before demolition work is started. In each case, any utility company which is involved shall be notified in advance.
- 1926.850(d) If it is necessary to maintain any power, water or other utilities during demolition, such lines shall be temporarily relocated, as necessary, and protected.
- 1926.850(e) It shall also be determined if any type of hazardous chemicals, gases, explosives, flammable materials, or similarly dangerous substances have been used in any pipes, tanks, or other equipment on the property. When the presence of any such substances is apparent or suspected, testing and purging shall be performed, and the hazard eliminated before demolition is started.
- 1926.850(f) Where a hazard exists from fragmentation of glass, such hazards shall be removed.
- 1926.850(g) Where a hazard exists to employees falling through wall openings, the opening shall be protected to a height of approximately 42 inches.
- 1926.850(h) When debris is dropped through holes in the floor without the use of chutes, the area onto which the material is dropped shall be completely enclosed with barricades not less than 42 inches high and not less than 6 feet back from the projected edge of the opening above. Signs, warning of the hazard of falling materials, shall be posted at each level. Removal shall not be permitted in this lower area until debris handling ceases above.
- 1926.850(i) All floor openings, not used as material drops, shall be covered over with material substantial enough to support the weight of any load which may be imposed. Such material shall be properly secured to prevent its accidental movement.
- 1926.850(j) Except for the cutting of holes in floors for chutes, holes through which to drop materials, preparation of storage space, and similar necessary preparatory work, the demolition of exterior walls and floor construction shall begin at the top of the structure and proceed downward. Each story of exterior wall and floor construction shall be removed and dropped into the storage space before commencing the removal of exterior walls and floors in the story next below.
- 1926.850(k) Employee entrances to multi-story structures being demolished shall be completely protected by sidewalk sheds or canopies, or both, providing protection from the face of the building for a minimum of 8 feet. All such canopies shall be at least 2 feet wider than the building entrances or openings (1 foot wider on each side thereof) and shall be capable of sustaining a load of 150 pounds per square foot.

The following security measures are employed at the Subject Property:

The Subject Property is fully fenced, and all entrances are gated with key card access only. The Subject Property is also staffed 24 hours a day, 7 days a week. The fuel unloading piping is capped within the truck unloading station when not actively being used.

## 8.6. GEOTECHNICAL INVESTIGATION

A Geotechnical investigation will be executed on site to perform soil borings, electrical resistivity, and seismic survey tests. The investigation will be performed within the limits of the site perimeter wall. Minimal ground disturbances are expected in the locations of the proposed testing points.

## 8.7. GEOPHYSICAL INVESTIGATION

A Geophysical investigation will be executed on site to perform Ground Penetrating Radar underground surveys. The investigation will be performed within the limits of the site perimeter wall. Ground disturbances are not expected as part of this investigation.

## 8.8. SECURITY AND ADMITTANCE TO SITE

It is required of all personnel to cooperate with the Owner's site security personnel and comply with all Owner's necessary security rules, policies, or procedures. General area security is provided in that the plant perimeter is fenced and access through the gate is controlled by Owner. Contractor shall take precautions against the loss of its material, tools, equipment and be responsible for the safety thereof.

In addition, Contractor's employees or visitors shall be required to wear company logo or other identification supplied by the Contractor. These logos shall be always visible. The outer buildings that are not part of the demolition shall be considered as restricted areas. All ladders, staging materials, equipment, and tools shall bear Contractor's identification mark and shall be checked by Contractor to ensure proper function before being carried into the site. No personal cars shall be permitted on the plant property beyond the designated parking lot. Contractor vehicles such as pickup trucks, etc., can enter the property grounds. All vehicles, personnel, storage containers, boxes, etc., may be searched by Owner upon leaving the Subject Property.

## 8.9. ACTIVITIES LIST

Table 8-1 below explains the Activities List developed to track items that will be salvaged or preserved throughout the Vega Baja decommissioning plan.

**Table 8-1 — Activities List**

Item	Description	Comments	Action
1	U1 Battery	Batteries and charger to be removed. Inspection shows batteries and charger appear to be in good condition. Place batteries and charger in surplus. The cost estimate provided in the decommissioning plan includes the removal, hauling, and disposal of the batteries.	Genera PR to remove
2	Control Room/Control System	Genera PR to identify and remove from site any operational equipment. The cost estimate provided in the decommissioning plan assumes complete demolition of these items.	Genera PR to remove
3	Owner retained equipment	Genera PR to identify and remove from site any operational equipment, including but not limited to the unit auxiliary transformer, diesel generator, and other items determined by Genera PR to be salvaged prior to demolition activities. The cost estimate provided in the decommissioning plan assumes complete demolition of these items.	Genera PR to identify the equipment that will be retained.
4	Lube Oil Pumps	The plan is for these pumps to be used as surplus. The cost estimate provided in the decommissioning plan assumes complete demolition of these items.	Genera PR to remove
5	Fuel Oil Tank	All existing tanks will be demolished by the contractor. The cost estimate provided in the decommissioning plan includes the contractor estimate to remove and dispose of the tank. The contractor will also remove any existent fuel in the tank.	This work must be done prior to mobilizing any machinery to site, performing any dismantlement or demolition work.
6	Site sumps	Genera PR to identify and remove from site any operational equipment. The cost estimate provided in the decommissioning plan assumes complete demolition of these items.	By Genera PR
7	Fire Protection	Demo Contractor shall isolate and depressurize the system if needed.	Demo Contractor to observe

Item	Description	Comments	Action
8	Loose Barrels	Genera PR to identify and remove from site. Not included in the cost estimate provided in the Decommissioning Plan.	By Genera PR
9	Project Management, Engineering / IT, and Admin Support	Owner's expense during demolition.	By Genera PR
10	Temporary Power and utilities	Genera PR to reconfigure site utility services to suit contractor's needs.	Genera PR to reconfigure
11	Main Power Transformer	This transformer will be preserved for future use in-situ.	Demo Contractor shall conduct long-term preservation activities for 3-year storage in-situ. Temporary power and protective barriers and cage shall be installed prior to mobilizing any machinery to site, performing any dismantlement or demolition work.
12	Gas Turbine Equipment	Genera PR to conduct a field inspection of the Frame 5 gas turbine equipment to determine if any components or assemblies are repairable or salvageable for use on other Frame 5 units within the fleet.	Genera PR staff, or other industry experts, will conduct this assessment prior to proceeding with Phase 3, and release a site inspection summary prior to proceeding to the next Phase of work. If needed, Genera PR will proceed with the safe removal of salvageable components.
13	De-energization of electrical equipment and/or utility reconfigurations	Prior to demolition activities.	By Genera PR
14	Site security costs	Genera PR to identify site security services required during demolition.	By Genera PR
15	Site services	Genera PR to identify site services required during demolition such as telephone, electricity, potable water, sewage, garbage collection, etc.	By Genera PR

## 9. Employee Transition

### 9.1. EMPLOYEE TRANSITION

An employee transition plan is not needed as there are no Genera PR employees that will be affected by the decommissioning of the Subject Property.



## 10. Execution Timeline

### 10.1. EXECUTION TIMELINE

Genera PR has decided to only include the Decommissioning Plan Development Timeline and the Demolition Timeline in the Decommissioning Plan rather than the whole decommissioning timeline.

The Demolition Timeline setting forth when decommissioning services shall be provided includes the duration from when the decommissioning services shall commence to the date on which the decommissioning services shall be completed. The environmental and historical permitting process is omitted from the Demolition Timeline, as this does not represent a decommissioning service, but rather is part of the pre-decommissioning effort. It is emphasized that significant variability in the duration of the permitting process may occur once the initial applications are made. The Vega Baja Demolition Timeline is included in Appendix F.

The Demolition Timeline provides a sequential description of tasks for the demolition of the Subject Property. The timeline begins at the Notice to Proceed, after environmental and historical permits have been provided, and ends at substantial completion of the demolition work. The projected duration of the demolition activities is twenty-nine (29) weeks, which represents an estimate of a reasonable time frame to complete the necessary demolition services, but which also does not include items set forth in Table 10-1.

It is essential to note that the schedule does not encompass time frames for permitting, unforeseen conditions, or site restoration. Additionally, thirteen (13) weeks are estimated for the removal of asbestos containing materials (ACM) and lead-based paint (LBP). The existence of ACM and LBP and other hazardous materials has not yet been determined. Determination of the existence of these materials will be made before the start of site work. The inclusion of this activity in the timeline is meant to include some consideration of this work in the decommissioning and demolition work but whose duration may vary significantly.

Vega Baja decommissioning effort, including pre-decommissioning, includes the following activities:

## 1. Pre-Decommissioning:

- a. The decommissioning of the site will involve an extensive permitting process involving various agencies such as FEMA, United States Fish and Wildlife Service (USFWS), and the State Historic Preservation Office (SHPO/OECH).
- b. Each stage involves the preparation and submission of permit applications, followed by thorough reviews and subsequent approvals.
- c. Wildlife consultation, historic preservation review, and environmental impact documentation are among the additional activities outlined in the timeline.
- d. Receipt of FEMA Decision on Required Level of NEPA Review is required before the start of the National Environmental Policy Act (NEPA) Review - Categorical Exclusion permit application.
- e. Preparation of the Environmental and Historic Preservation (EHP) Review permit application is required before the start of the Environmental Protection - Rule 141 - Environmental Impact Documentation permit application.
- f. Preparation of the National Environmental Policy Act (NEPA) Review - Categorical Exclusion permit application is required before the start of the Biological Resources - Endangered Species Act (ESA) Section 7 Endangered Species Consultation permit application.
- g. Data from the National Environmental Policy Act (NEPA) Review - Categorical Exclusion permit application is required before the completion of the National Historic Preservation Act Consultation (Section 106) permit application.
- h. Environmental Protection - Asbestos/Lead Removal Permit is the responsibility of the Demolition contractor.
- i. Receipt of permits are tied to the start of the Decommissioning work.
- j. Pre-decommissioning owner activities including an assessment by the owner of assets to be salvaged or removed; provision of temporary site services, including power, security, water, admin, etc.

The pre-decommissioning permitting process is outside the control of the project team after submitting initial permit applications and has been excluded from the Demolition Timeline in Appendix F. The pre-decommissioning permitting process presents a risk of project delay if the process becomes prolonged, wherein the project team will have little to no ability to influence the permitting timeline.

## 2. Contracting and Procurement:

- a. Contracts are allocated for lead and asbestos testing, as well as for geotechnical and geophysical investigations, and ultimately for demolition services. These investigations will help inform the anticipated decommissioning and demolition scope and assist in the selection of the appropriate decommissioning and demolition contractors.
- b. Detailed field surveys and final reports are generated based on the outcomes of these investigations.
- c. Requests for proposals (RFPs) are issued, and contracts for demolition services (above and below ground) are signed following a rigorous evaluation process, and after the decommissioning plan is approved.
- d. The selected aboveground demolition Contractor will perform their own surveys to determine the existence of LBP, ACM, and other hazardous materials to manage their liability.
- e. The aboveground demolition Contractor will apply for the necessary permits for the decommissioning and demolition work.

The aboveground demolition Contractor will perform their own site assessment to determine the existence, and extents, of lead-based paint and asbestos containing materials in addition to the preliminary hazardous materials survey as a way of managing their liability. Additional permits will be needed for the site activities during the decommissioning and demolition work that can only be made after the contractor has been selected. One week has been allocated in the Demolition Timeline Schedule for mobilization, which includes the site work permitting process. The project team has little control of the time frame and outcomes of this activity, and this duration may vary.

## 3. Demolition:

- a. The Demolition Timeline provides a breakdown of the step-by-step process for physically demolishing the plant.
- b. Mechanical and electrical disconnections precede the removal of equipment and structures.
- c. Strict safety measures, such as the isolation of energy sources and certification of site readiness, are enforced before commencing demolition activities.
- d. Various structures and equipment, including turbines, storage tanks, and buildings, are demolished in accordance with the established timeline.

Although attempts will be made to fully understand the present conditions of the site, unforeseen conditions are frequently encountered when working on existing sites. The project team has no control over the existence or impact of these unforeseen conditions, which may pose a risk to the overall project duration.

The Demolition Timeline in Appendix F excludes work that addresses unforeseen conditions, as well as, any delays resulting from the following circumstances, for which more time will be granted:

**Table 10-1 — Conditional Project Duration Risks**

No.	Issue	Description
1	Environmental Assessments and Permits	<ul style="list-style-type: none"> <li>Changes in environmental law and environmentally related permits.</li> <li>Denial or delays in obtaining necessary environmental permits or approvals.</li> <li>Unforeseen environmental contamination requiring additional remediation efforts.</li> </ul>
2	Regulatory Compliance	<ul style="list-style-type: none"> <li>Denial or delay in obtaining necessary permits or approvals.</li> <li>Changes in applicable law or regulatory requirements, or additional compliance measures imposed by authorities.</li> <li>Changes in regulatory interpretation.</li> <li>Changes in regulatory enforcement.</li> <li>Extended review periods by regulatory agencies.</li> </ul>
3	Site Conditions	<ul style="list-style-type: none"> <li>Need of additional space for any reason, including project development entailing an acquisition process.</li> <li>Unforeseen technical difficulties in dismantling equipment or infrastructure.</li> <li>Unanticipated structural issues or site conditions that complicate demolition.</li> <li>Unforeseen site conditions whether subsurface or otherwise concealed.</li> <li>Changes in the site conditions due to weather or otherwise.</li> </ul>
4	Technical Challenges	<ul style="list-style-type: none"> <li>Unforeseen technical difficulties in decommissioning or dismantling equipment or infrastructure.</li> <li>Delays due to the unforeseen need for specialized equipment or expertise.</li> </ul>
5	Weather and Natural Events	<ul style="list-style-type: none"> <li>Adverse weather conditions impacting demolition activities.</li> <li>Natural disasters (e.g., earthquakes, floods) causing delays.</li> </ul>
6	Contractor and Resource Availability	<ul style="list-style-type: none"> <li>Limited availability or delay in obtaining qualified contractors or specialized personnel for whatever reason.</li> <li>Limited availability or delays in the delivery of necessary equipment or materials, or other supply chain constraints.</li> <li>Exceeding capacity limits of approved dumps for disposal of debris.</li> <li>Unavailability of labor or subcontractors.</li> </ul>
7	Health and Safety Concerns	<ul style="list-style-type: none"> <li>Unanticipated health and safety risks requiring additional precautions.</li> <li>Implementation of HSE measures by a governmental authority for whatever reasons.</li> <li>Incidents or accidents on-site necessitating work stoppages or investigations.</li> </ul>

No.	Issue	Description
8	Stakeholder and Community Engagement	<ul style="list-style-type: none"> <li>Delays due to the need for additional stakeholder consultations or community engagement.</li> <li>Public opposition to the project.</li> <li>Interference from environmental, community, or social justice organizations.</li> <li>Legal challenge seeking to contest the validity of the RFP, the demolition agreement, any permits, or any other transaction contemplated in the demolition contract.</li> </ul>
9	Change Order Risk / Financial Constrains	<ul style="list-style-type: none"> <li>Unexpected cost overruns requiring additional financial planning and consulting with regulatory agencies to have budget and funding increases.</li> <li>Change Order risk.</li> </ul>
10	Logistical Issues	<ul style="list-style-type: none"> <li>Unforeseen changes with respect to the transportation permits and the means of transportation of debris.</li> <li>Transportation, logistics or access issues affecting the movement of materials, equipment, and labor.</li> <li>Issues that affect the availability and condition of roads, bridges or other transportation infrastructure required to mobilize equipment, materials, and labor in and out of the site.</li> <li>Coordination challenges with other ongoing projects or site activities.</li> </ul>
11	Contractor Delays	<ul style="list-style-type: none"> <li>Failure of contractors and their subcontractors to execute tasks within the timeframes established in their contracts or subcontracts.</li> <li>Delays caused by contractor and its subcontractors performance issues.</li> </ul>
12	Labor-Related Issues:	<ul style="list-style-type: none"> <li>Delays due to labor strikes, work stoppages, or other union-related actions.</li> <li>Negotiation challenges with unions affecting the availability of labor or the timeline for project execution.</li> <li>Delays due to reduced productivity caused by labor disharmony.</li> </ul>

#### 4. Completion and Finalization:

- a. The demolition activities conclude with minor site restoration, ensuring the site is entirely cleared and safe.
- b. Final reports and certifications are meticulously prepared, marking the formal completion of the decommissioning and demolition project.

In summary, the decommissioning services timeline offers a plan for effectively managing the process of dismantling and demolishing the Subject Property. It prioritizes regulatory compliance, environmental safety, and the efficient execution of the Project.

## 11. Documentation and Knowledge Management

### 11.1. REPORTING REQUIREMENTS

Genera PR will provide quarterly reports to the Energy Bureau and P3A on the progress of the decommissioning project, beginning from the date of the Plan's approval by the Energy Bureau. The quarterly reports on the decommissioning project will include, at a minimum, the following information:

- (i) Detailed updates on the completion of key project milestones and any deviations from the original schedule.
- (ii) An overview of the expenditures to date, including a comparison with the budgeted amounts and an explanation of any variances.
- (iii) A description of the work completed during the reporting period, including a summary of decommissioning activities and any issues encountered.
- (iv) An outline of planned activities for the next reporting period, including anticipated challenges and strategies for addressing them.
- (v) Confirmation of compliance with all relevant regulatory requirements during the reporting period.

### 11.2. DOCUMENT CONTROL PROCESS

Document control is a critical component of quality management for the pre-Decommissioning, Decommissioning, and post-Decommissioning processes of the Subject Property. It involves the systematic governance of creating, reviewing, modifying, issuing, distributing, and accessing documents. This process ensures that documents are accurate, dependable, and accessible to authorized individuals while being protected from unauthorized access or alteration. Effective document control is foundational to maintaining the integrity of documents, ensuring compliance with industry standards and regulations, and supporting efficient and error-free operations.

### 11.3. DOCUMENTS

The following is a list of project-related documents that will be managed by this document control process. Maintaining a centralized document control repository ensures that all relevant stakeholders have access to essential information, as applicable, throughout the decommissioning process and beyond.

- **Decommissioning Plan:** This is a comprehensive document outlining the strategies, procedures, and timeline for the decommissioning process.
- **Regulatory Permits and Approvals:** Any permits and approvals obtained from regulatory bodies for the decommissioning process.



- Environmental Impact Reports and Assessments: Documents detailing the environmental impact of decommissioning and strategies for mitigation.
- Engineering Design Documents: Schematics, blueprints, and technical drawings related to the decommissioning process.
- Safety Procedures and Manuals: Manuals outlining safety protocols, emergency procedures, and hazard assessments during decommissioning.
- Contract Agreements: Any contracts, agreements, and subcontracts related to decommissioning activities with contractors, vendors, and suppliers.
- Financial Records: Budgets, cost estimates, and financial reports associated with the decommissioning project.
- Health and Safety Records: Records of health monitoring, safety inspections, incident reports, and employee training related to decommissioning.
- Waste Management Plans and Records: Plans for managing and disposing of hazardous and non-hazardous waste generated during decommissioning, including manifests and disposal certificates.
- Equipment Inventory and Maintenance Records: Inventory lists of equipment used during decommissioning, maintenance logs, and inspection records.
- Quality Assurance and Quality Control Documents: Procedures, audits, and documentation ensuring the quality and integrity of decommissioning activities.
- Community Relations and Communications: Records of community meetings, public notices, and communications regarding decommissioning activities.
- Training and Certification Records: Records of training programs attended by decommissioning personnel, as well as certifications and qualifications.
- Closure and Post-Closure Plans: Plans for site closure and post-closure monitoring, including long-term stewardship commitments.
- Documentation of Stakeholder Engagement: Records of stakeholder meetings, feedback received, and responses to concerns raised by stakeholders.
- Legal and Regulatory Correspondence: Correspondence with regulatory agencies, legal counsel, and stakeholders related to decommissioning activities.

- Emergency Response Plans: Plans outlining procedures for responding to emergencies and unplanned events during decommissioning.
- Final Decommissioning Report: A comprehensive report summarizing the decommissioning process, outcomes, lessons learned, and any residual risks.

## 11.4. TIMELINE

- Creating Folder Structure and File Naming Convention
  - Establish a standardized folder structure reflecting the organizational hierarchy.
  - Define a consistent file naming convention to ensure easy retrieval and understanding.
- ID Historical Files and Documents to be stored.
  - Digitize all historical files and documents.
  - Upload digitized files to the designated platform.
  - This phase constitutes the largest lift in the process.
- ID Current and Future Files and Documents to be stored.
  - Identify current files and documents for storage.
  - Anticipate future document needs based on project requirements and organizational goals.
- Establish User Access
  - Define user roles and permissions.
  - Implement access controls to safeguard sensitive information.

## 11.5. BUDGET

- Locating, Digitizing, Renaming, and Filing Historical Files and Documents
  - Task: Locate, digitize, rename, and file historical documents according to the established structure and naming convention.
- Implementing the Document Management Flowchart Firm-wide
  - Objective: Roll out the document management flowchart across the organization to ensure consistency.

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## Appendix A. Vega Baja Decommissioning Notice

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Vega Baja Proposed Decommissioning Plan

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GOVERNMENT OF PUERTO RICO  
PUERTO RICO PUBLIC-PRIVATE PARTNERSHIPS AUTHORITY

May 16, 2024

**BY ELECTRONIC MAIL**

**Brannen McElmurray**

President and CEO

Genera PR LLC

brannen@genera-services.com

with copy to:

**Genera PR LLC**

Attention: General Counsel

legal@genera-pr.com

**Re: Decommissioning Notice**

Dear Mr. McElmurray,

Reference is made to the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("LGA O&M Agreement")<sup>1</sup> dated as of January 24, 2023, by and among the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and Genera PR LLC ("Genera").

As pursuant to Section 16.1 of the LGA O&M Agreement, this letter serves as notice to Genera, as operator, for the retirement of two Legacy Generation Assets (Vega Baja Gas Turbine 1-1 and 1-2) and the commencement of decommissioning services at these two peaking units. P3A, as Administrator, acting on behalf of PREPA, as Owner, has considered the Integrated Resource Plan and has consulted with both (i) PREB and (ii) T&D Operator ("LUMA") before delivering such notice for the decommissioning of these two combustion turbines, which were commissioned in 1971 and have been out of service since September 2021 and July 2020, respectively.

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<sup>1</sup> Terms not defined in this letter shall have the meanings ascribed to them in LGA O&M Agreement.

The decommissioning of these units is aligned with PREB's order<sup>2</sup> and the 2020 Integrated Resource Plan, which plans to retire all eighteen of the existing units including Vega Baja. Genera's plan to repurpose the Vega Baja site, deploying Battery Energy Storage Systems ("BESS") to create an energy storage facility to provide ancillary services to the grid, has been approved by PREB via resolution and order on February 1, 2024.<sup>3</sup>

Furthermore, LUMA is responsible for reviewing retirement requests as established by Section 3.3 of LUMA's System Operation Principles.<sup>4</sup> LUMA has notified Genera and P3A of its review and agrees that the decommissioning of the Vega Baja units is in the interest of the ratepayers and will have no impact on the system's reliability.

**Given the above, P3A hereby (i) provides notice for the retirement of the two gas combustion turbines as Vega Baja, (ii) kindly requests that Genera conduct inspections on the Frame 5 units to determine if any are repairable or salvageable for use on other Frame 5 sites and (iii) asks Genera to confirm that this plan includes the retirement of the air permits for the decommissioned Vega Baja units 1-1 and 1-2.**

However, P3A would like to remind Genera that although Genera submitted its Decommissioning Plan to PREB<sup>1</sup> on April 17, 2024, Section 16.1(b) requires that Operator also submit the plan to P3A for its approval and provide a copy to Owner and T&D Operator within one hundred twenty (120) days after receiving this notice.

As per Section 16.2(a)(ii), the Decommissioning Plan shall provide the development of the Decommissioning Budget. It is P3A's understanding that these decommissioning expenses will be covered by federal funding.<sup>5</sup> Once these plans have been submitted to P3A and P3A has reviewed them, P3A will provide feedback for approval. As outlined in the LGA O&M Agreement, Genera is the sole entity responsible for procuring and administering federal funds, and P3A expects that all the federal funding received will be used to cover the Decommissioning Budget. In the event federal funding is not received, P3A will revisit the Decommissioning Budget funding with Genera pursuant to the terms of the LGA O&M Agreement.

Similarly, under Annex II(B) of the LGA O&M Agreement, Genera is entitled to the O&M Fixed Fee Adjustment on the first day of Contract Year 6. As per the LGA O&M Agreement, when Legacy Generation Assets are decommissioned prior to Contract Year 6, the Adjustment Date shall be the first day of Contract Year 6.

<sup>2</sup> PREB Docket CEPR-AP-2018-0001 Final Resolution and Order, August 24, 2020.

<sup>3</sup> PREB Docket NEPR-MI-2021-0002

<sup>4</sup> Approved by PREB through docket NEPR- MI-2021-0001

<sup>5</sup> PREB's March 26 Resolution, pp. 18-19

\* \* \*

P3A is available to discuss any questions or comments you may have. Please do not hesitate to contact me at [gerardo.loran@p3.pr.gov](mailto:gerardo.loran@p3.pr.gov) or (787) 722-2525 if you have any questions.

Sincerely,



Gerardo Lorán  
Director Project Monitoring  
Puerto Rico Public-Private Partnerships Authority

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## Appendix B. Vega Baja Community Relations Plan

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# Vega Baja Community Relations Plan v 1.2



**Marzo 2024**

*Prepared for*

**Vega Baja communities, local government, and news media**

*Prepared by*



**Genera PR LLC**

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San Juan, PR 00918

[www.genera-pr.com](http://www.genera-pr.com)

## TABLE OF CONTENTS

<b>1.0</b>	<b>OVERVIEW OF THE COMMUNITY RELATIONS PLAN.....</b>	<b>1</b>
1.1	Purposes of the Plan.....	1
1.2	Roles and Responsibilities .....	3
1.3	Sources of Information for Community Relations Plan .....	4
1.4	Organization of this Community Relations Plan .....	4
<b>2.0</b>	<b>SITE BACKGROUND .....</b>	<b>5</b>
2.1	Site Location and Description .....	5
2.2	Site History .....	5
2.2.1	<i>Site Environmental Investigations.....</i>	<i>7</i>
2.2.2	<i>Agency Inspections .....</i>	<i>8</i>
2.3	Work in Progress .....	9
<b>3.0</b>	<b>COMMUNITY BACKGROUND AND INVOLVEMENT .....</b>	<b>10</b>
3.1	Demographics .....	10
3.2	Community Concerns .....	12
<b>4.0</b>	<b>COMMUNITY INVOLVEMENT ACTIVITIES .....</b>	<b>13</b>
4.1	Communication Tools .....	13
4.1.1	<i>General PR Website .....</i>	<i>13</i>
4.1.2	<i>Fact Sheets .....</i>	<i>15</i>
4.1.3	<i>Public Information Meetings.....</i>	<i>15</i>
4.1.4	<i>Response to Comments .....</i>	<i>16</i>
4.1.5	<i>Local Media Sources .....</i>	<i>16</i>
4.1.6	<i>Briefings for Elected Officials .....</i>	<i>16</i>
4.2	Project Contacts .....	17

## **4.3 Budget/ Funding and Timetables.....18**

### **FIGURES AND TABLES**

Figure 1 Site Location Map

Figure 2-7 Site Location images by Jesus Cintron

Figure 8-9 Newsletter Fact Sheet Example

Table 1 Demographics for the Vega Baja Municipality, Puerto Rico

### **APPENDICES**

APPENDIX A Glossary of Terms & Acronyms

APPENDIX B List of Contacts and Interested Parties

## **1.0 OVERVIEW OF THE COMMUNITY RELATIONS PLAN**

### **Background**

The Vega Baja site consists of approximately 1.3 acres of land, located at PR-2, km 39.4, Monte Carlo sector, Barrio Algarrobo, Bega Baja, Puerto Rico. The site is currently developed as an electric power generating station, consisting of two 22 MW diesel generating units, each with a 3,000 KVA transformer. In addition to power generating activities, ancillary activities conducted at the site include limited equipment and machinery maintenance, electric power transmission, and associated plant operations.

The site has operated as an electric power generating station for over 50 years. The two diesel generators are not currently in operation, with one of the units was last in operation in 2022 and the other unit last in operation in 2019.

Genera plans to decommission and demolish the diesel generating units, and associated infrastructure beginning December 2024. The site will be repurposed to serve as a future Battery Energy Storage System (BESS), with installation of the new BESS starting as early as June 2025.

### **1.1 Purposes of the Plan**

The purpose of this Community Relations Plan (Plan) is to establish a framework for communications relating to the Project on the Vega Baja LGA between Genera PR and the community.

Through implementation of the measures set forth in this Plan, Genera PR will disseminate of information relating to the Project to the community to keep the community informed and to provide for meaningful public participation in connection with the decommissioning, decontamination, demolition, corrective action, and construction activities that will occur at the Site. Under the Plan, Genera PR will host forums for information exchange and public comment on Project activities at the Site in coordination with (parties involved) and the City. The Plan is designed to facilitate timely communications among Genera PR and the public; local, state, and federal officials; and other parties interested in the Project.

The specific objectives of this Plan are to:

1. Engage with local communities, government agencies and media to initiate open

communication and to inform them about the decommissioning process.

2. Address concerns, answer questions, and gather feedback from residents and local authorities to facilitate ongoing dialogue and transparency.
3. Consider incorporating mechanisms for ongoing community involvement throughout the decommissioning process, and new BESS project such as community advisory boards.
4. Utilize various communication channels including social media, websites, and local newspapers to disseminate information and gather feedback. Include information on the size of the LGA, its location, and any environmental or community considerations.

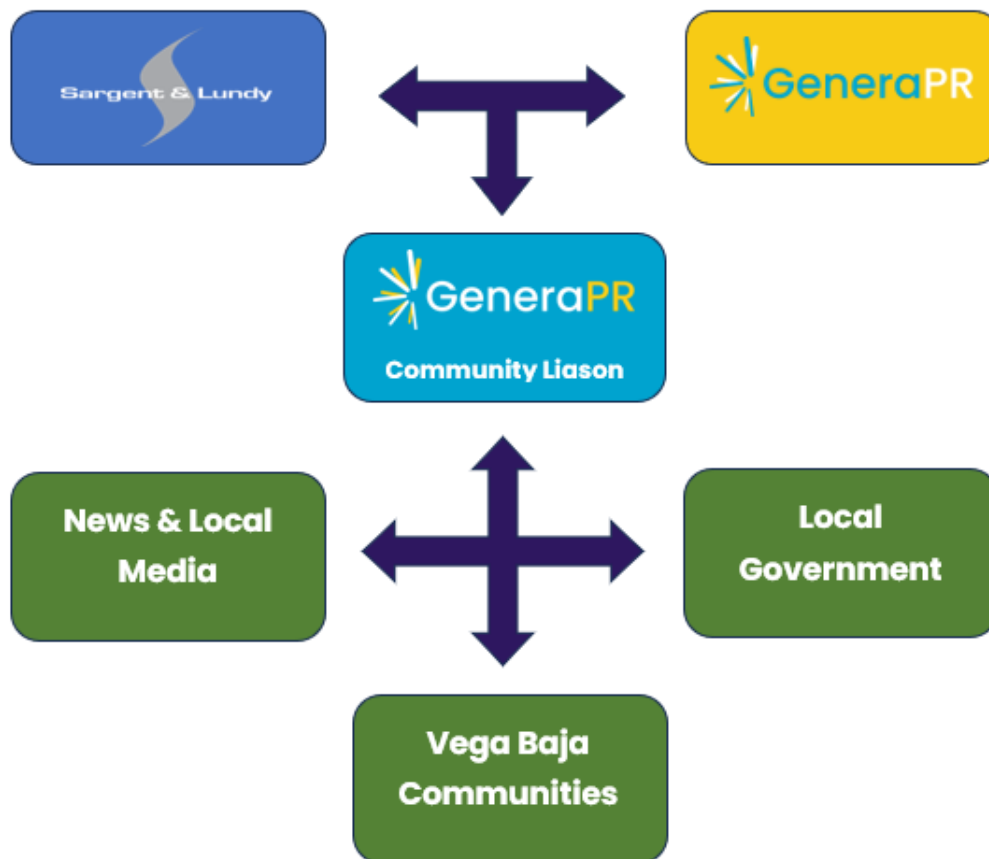
Genera PR welcomes suggestions regarding the processes and tools for communication laid out in this Plan. This Plan will be reviewed periodically and may be modified to better achieve the Plan objectives.



## 1.2 Roles and Responsibilities

Genera PR will manage all aspects of the Project. Genera PR has hired Sergeant and Lundy as the Engineering consulting firm to provide Project oversight as the decommissioning contractor.

### Lines of Communication



### **1.3 Sources of Information for Community Relations Plan**

This Plan was developed based on publicly available information and discussions with state and local officials. It is also based on the Company's knowledge and historical records and demographic information for neighborhoods around the Site. Demographic information was provided by the U.S. Census Bureau.

### **1.4 Organization of this Community Relations Plan**

This Plan is organized as follows:

- The Site and its history.
- Current and planned Site activities; and
- Description of specific community relations activities planned during the Project.

## **2.0 SITE BACKGROUND**

This section provides a brief description of the Site and a summary of current and planned Site activities.

### **2.1 Site Location and Description**

The Site is located within the municipality of Vega Baja at PR-2, km 39.4, Monte Carlo sector, Barrio Algarrobo, Vega Baja, Puerto Rico. The Site is located within an urban area and encompasses approximately 1.3 acres surrounded by commercial facilities and residences. The site is bounded to the north by State Road PR-2 and commercial establishments. South of the site are commercial businesses. East of the site is a LUMA transmission center. West of the site is LUMA technical division warehouse. The nearest residential properties are located across State Road PR-2, in the Monte Carlo sector and Las Flores residential community.

A Site Location Map and Site Overview are presented in Figure 1.

The site is currently developed as an electric power generating station, consisting of two 22 MW diesel generating units, each with an associated 3,000 KVA transformer. In addition to power generating activities, ancillary activities conducted at the site include limited equipment and machinery maintenance, electric power transmission, and associated plant operations (e.g., controls and bulk storage). Maintenance of the electric power generating equipment is performed onsite, which includes welding, electrical work, repair, servicing, and refueling. Solid waste produced from these operations (e.g., scrap metal, trash, used oil, and oil contaminated materials) is stored in designated areas throughout the site before being disposed of offsite. Diesel fuel is received at the site in a designated area from tanker trucks, which unload fuel into a diesel storage tank.

The site is not currently in operation, as the two diesel generating units last operated in 2019 and 2022. Decommissioning and demolition of the diesel generator units, and associated infrastructure, is planned to prepare for the repurposing of the site to support a BESS.

### **2.2 Site History**

The site has operated as an electric power generating station for over 50 years. Since at least the late 1970s, the site has been bounded to the north by present day PR-2 and surrounded by mostly commercial and residential properties. By 1989, a warehouse structure was

constructed adjacent to the west of the site, which is currently operated by LUMA. Overall, the surrounding area has included commercial establishments, mostly along and near PR-2 since the late-1970s. The surrounding area is generally in its current configuration dating back to the mid-1980.

### **2.2.1 *Site Environmental Investigations***

The U.S. EPA oversees the standards for contaminated site cleanups across the United States, including territories like Puerto Rico, through programs such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, and the Resource Conservation and Recovery Act (RCRA). These programs have provisions for corrective actions to remediate or manage contaminated soils. Under RCRA, facilities that treat, store, or dispose of hazardous waste are required to investigate and remediate if contamination is found. This process involves setting corrective action objectives based on risk assessments, which consider factors such as the level of contaminants present, the potential for human exposure, and the characteristics of the local environment.

In Puerto Rico, the Environmental Quality Board (Junta de Calidad Ambiental or JCA) is the agency responsible for establishing and enforcing environmental standards, including those for soil remediation. The requirements for soil remediation may vary depending on the specifics of the contaminated site, such as the type and concentration of contaminants, the land use, and the potential for human exposure.

If evidence of contamination is found, environmental subcontractors will be engaged to formally investigate the type and extent of contamination, propose remediation activities and to work with the relevant agencies to execute those activities, resulting in closure of the issues to the extent appropriate for the area remediated.

### **2.2.2 *Agency Inspections***

Throughout the course of its operations, the Vega Baja LGA site has been subject to various inspections by environmental agencies but due to its long service life, comprehensive records are not available. The most recent inspection performed was a Phase I Environmental Site Assessment in June 2023.



## **2.3 Work in Progress**

As decommissioning takes place, other activities will be underway at the site. Activities associated with the decommissioning of the site may include:

- Geotechnical and Geophysical surveys
- Waste material identification, and disposal.
- Hazardous and contaminants material testing, removal, and disposal
- Demolition and dismantling of buildings and structures.
- Preparation for site restoration

## **3.0 COMMUNITY BACKGROUND AND INVOLVEMENT**

### **3.1 Demographics**

According to the U.S. Census Bureau, the following are an overview of key demographics for the Municipality of Vega Baja, Puerto Rico:

- The population of Vega Baja is approximately 53,684 people.
- Households approximately 20,098
- Nearly 76.7 percent of the adult population (25+) are high-school graduates.
- Households with a computer 82.8%
- The median household income is approximately \$23,701.

<b>QuickFacts</b> <b>Vega Baja Municipio, Puerto Rico; Puerto Rico</b>	<b>Vega Baja Municipio, PR</b>	<b>Puerto Rico</b>
Population Estimates, July 1, 2022, (V2022)	53,684	3,220,113
Population estimates base, April 1, 2020, (V2023)	NA	3,285,874
Population estimates base, April 1, 2020, (V2022)	54,414	3,285,874
Population, percent change - April 1, 2020 (estimates base) to July 1, 2023, (V2023)	NA	-2.4%
Population, percent change - April 1, 2020 (estimates base) to July 1, 2022, (V2022)	-1.3%	-2.0%
Population, Census, April 1, 2020	54,414	3,285,874
Population, Census, April 1, 2010	59,662	3,725,789
<b>Age and Sex</b>		
Persons under 5 years, percent	3.3%	3.1%
Persons under 18 years, percent	16.1%	16.1%
Persons 65 years and over, percent	23.2%	23.5%
Female persons, percent	52.4%	52.7%
<b>Race and Hispanic Origin</b>		
White alone, percent	40.5%	43.6%
Black or African American alone, percent(a)	4.5%	8.8%
American Indian and Alaska Native alone, percent(a)	0.0%	0.2%
Asian alone, percent(a)	0.0%	0.2%
Native Hawaiian and Other Pacific Islander alone, percent(a)	0.0%	0.0%
Two or More Races, percent	36.8%	23.3%
Hispanic or Latino, percent(b)	97.9%	98.7%
White alone, not Hispanic or Latino, percent	1.8%	0.8%
<b>Population Characteristics</b>		
Veterans, 2018-2022	1,076	69,744
Foreign born persons, percent, 2018-2022	0.7%	2.7%
<b>Housing</b>		
Housing units, July 1, 2022, (V2022)	X	X
Owner-occupied housing unit rate, 2018-2022	75.5%	68.0%
Median value of owner-occupied housing units, 2018-2022	\$115,900	\$121,800
Median selected monthly owner costs -with a mortgage, 2018-2022	\$895	\$935
Median selected monthly owner costs -without a mortgage, 2018-2022	\$166	\$170

(a) Includes persons reporting only one race.

(b) Hispanics may be of any race, so also are included in applicable race categories.

(c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

Source: [U.S. Census Bureau QuickFacts: Vega Baja Municipio, Puerto Rico; Puerto Rico](#)

### **3.2 Community Concerns**

Genera PR will host public meetings, open houses, small neighborhood meetings, and have contact with local community organizations, and discussions with local and state officials. Genera PR recognizes that the level of community interest in the Site and the Project is high. The measures to be implemented pursuant to this Plan are designed to facilitate communications between Genera PR and the community concerning Genera PR's plans and establish channels for Genera PR to keep members of the community informed of activities and developments on the Site. Further, the communication lines established by this Plan are intended to provide an opportunity for meaningful input by the public and to enable Genera PR to understand and respond to community concern

## **4.0 COMMUNITY INVOLVEMENT ACTIVITIES**

The primary objectives of the community involvement activities to be undertaken by Genera PR are to keep the community informed of what's going on at the Site and to provide a forum for public input. This section outlines the actions that Genera PR will take to facilitate a successful two-way communication process.

"Community" means residents, businesses, schools, elected officials, local and state agencies, environmental groups, service organizations, and anyone else who has an interest in the Site.

### **4.1 Communication Tools**

Genera PR is committed to keeping the public informed and providing an opportunity for meaningful public comment throughout the Project. As part of this commitment, Genera PR will utilize the tools presented below.

#### **4.1.1 *Genera PR Website***

Genera PR has a public website ([www.genera-pr.com](http://www.genera-pr.com)) to provide Site-related information and information on current Site activities. This website will provide Site information such as:

- a description and projected timeline for completion of each of the stages of the Project.
- draft and final work plans.
- deadlines for submitting comments on draft work plans.
- progress reports for plans being implemented.
- Site data.
- questions submitted by the public through the website and Genera PR's responses to those questions; and
- notices of public meetings and copies of documents, slides and information presented at public meetings.

As noted, the website provides a convenient forum for individuals to provide comments on and to ask questions relating to the Project. It also allows Genera PR a single forum to respond to the public's comments and questions.

Genera PR has established this section of the website for community input and to receive and respond to questions and comments that are directly about the Project and the activities that are being initiated in conjunction with the decommission of the Vega Baja LGA power plant. Not all website questions or comments meet these criteria. For example, Genera PR could receive questions unrelated to the Project, as it has happened before. Genera PR will commit to post all questions and comments related to the Project criteria



#### **4.1.2 *Fact Sheets***

Genera PR will prepare and periodically publish fact sheets regarding Project progress. The fact sheets will address technical milestones; the current list of contacts and information repositories; public comment periods for draft work plans and other documents; and other issues. Fact sheets will be available in both English and Spanish and located in the website link located on the main page of the website. Fact sheets may also be distributed at public meetings and will be available at the designated information repository.

#### **4.1.3 *Public Information Meetings***

Genera PR will host, at a minimum, quarterly public information meetings during the Project decommissioning, decontamination, demolition, corrective action, and construction activities to provide information to the public about the process and activities. The typical meeting format is expected to consist of a structured information session followed by an informal opportunity for members of the public to meet with Genera PR representatives to ask questions and provide input. As previously noted, the public website will serve as the forum for formal questions and comments. All public meetings will be held at an accessible facility in the community. Notices for each public meeting will be posted on Genera PR's website and published in local media sources. Genera PR's goal is to provide a 30-day notice for all public meetings, however given the Project timeline and Genera PR's commitment to keeping the public informed, some meeting notifications may fall short of the 30-day notice period. Representatives from the communities, local govt and news media will be invited to each public meeting.

The format of the meetings will allow Genera PR to present relevant information and updates and member of the public to have an opportunity to dialogue with Genera PR representative. Each meeting will follow an agenda that will be posted on the website and made available at the meeting.

#### **4.1.4 *Response to Comments***

Genera PR will respond in writing on the Genera PR website to written questions and comments that meet the community input/Project activity criteria (whether posted on the website or provided in writing at the public meeting), [www.genera-pr.com](http://www.genera-pr.com). As noted, questions and comments that do not meet the community input/Project activity criteria will be posted and Genera PR will state the reason it is not providing a response. Questions asked during a public meeting formal question and answer period that meet the community input/Project activity criteria will be answered, to the extent possible, at the time of the meeting.

Genera PR has established a section of their website for community input and to receive and respond to questions and comments that are directly about the Project and the activities that are being initiated in conjunction with decommission of the Vega Baja LGA plant. Not all website questions or comments meet these criteria. For example, Genera PR could receive questions unrelated to the Project, as it has happened before. Genera PR will commit to post all questions and comments related to the Project criteria. Genera PR commits to post all questions and comments and for those that do not meet the community input/Project activity criteria, to state the reason it is not providing a response.

#### **4.1.5 *Local Media Sources***

Public notices, such as ads in newspapers, will also be used to announce public information meetings. These notices will be in English and Spanish. Examples of newspapers that serve this community are the following: El Nuevo Dia, El Vocero, Primera Hora & San Juan Star. Additional media such as both English and Spanish broadcasted radio and TV may occasionally be used.

#### **4.1.6 *Briefings for Elected Officials***

Genera PR will hold briefings with elected officials and candidates to keep them informed of the Project status, timelines and any significant developments or events related to the demolition, decommission and construction of BESS project, as requested.

## **4.2 Project Contacts**

Questions and comments should be submitted through the website: [www.genera-pr.com](http://www.genera-pr.com)

This centralized system will generally expedite responses to the public. Genera PR welcomes community inquiries and input relating to the Project throughout the Project.

Questions will be addressed in the order they are received.

For all other purposes including reporting concerns and/or complaints regarding Project the community relations contacts are:

Genera PR:

Full contact information

Sargent and Lundy:

Full contact information

Municipality of Vega Baja:

Full contact information

Add others if needed.

### 4.3 Budgets, Fundings and Timetables

There will be two events that will have preliminary budgets as they'll be considered "High importance events". Both preliminary budgets will be of \$10K each.

Genera will be using a third-party agency for said events as well as the production of fact sheets and leave-behind materials for meetings with the communities.

Preliminary timetables:

ACTIVITY	DATES	BUDGET
FACT SHEET AND Q&A	August 2024	0
Meetings with local gvt. Officials, municipal legislators, and community leaders	September 2024	0
Genera Website project tab	September 2024	0
Public information Meetings	September/October 2024	0
Groundbreaking Ceremony	November/December 2024	\$10,000
Inauguration Event	March/ April 2025	\$10,000

August: Fact sheets about the project progress (4.1.2) as well as FAQ to be used as leave behind Material should be completed by August 2024

September 2<sup>nd</sup>, 2024: initial meetings with local government officials (Mayor and his team), municipal legislators and community leaders.

September: Genera website project tab (4.1.1) where the public can access the information regarding the project progress should come online by this due date.

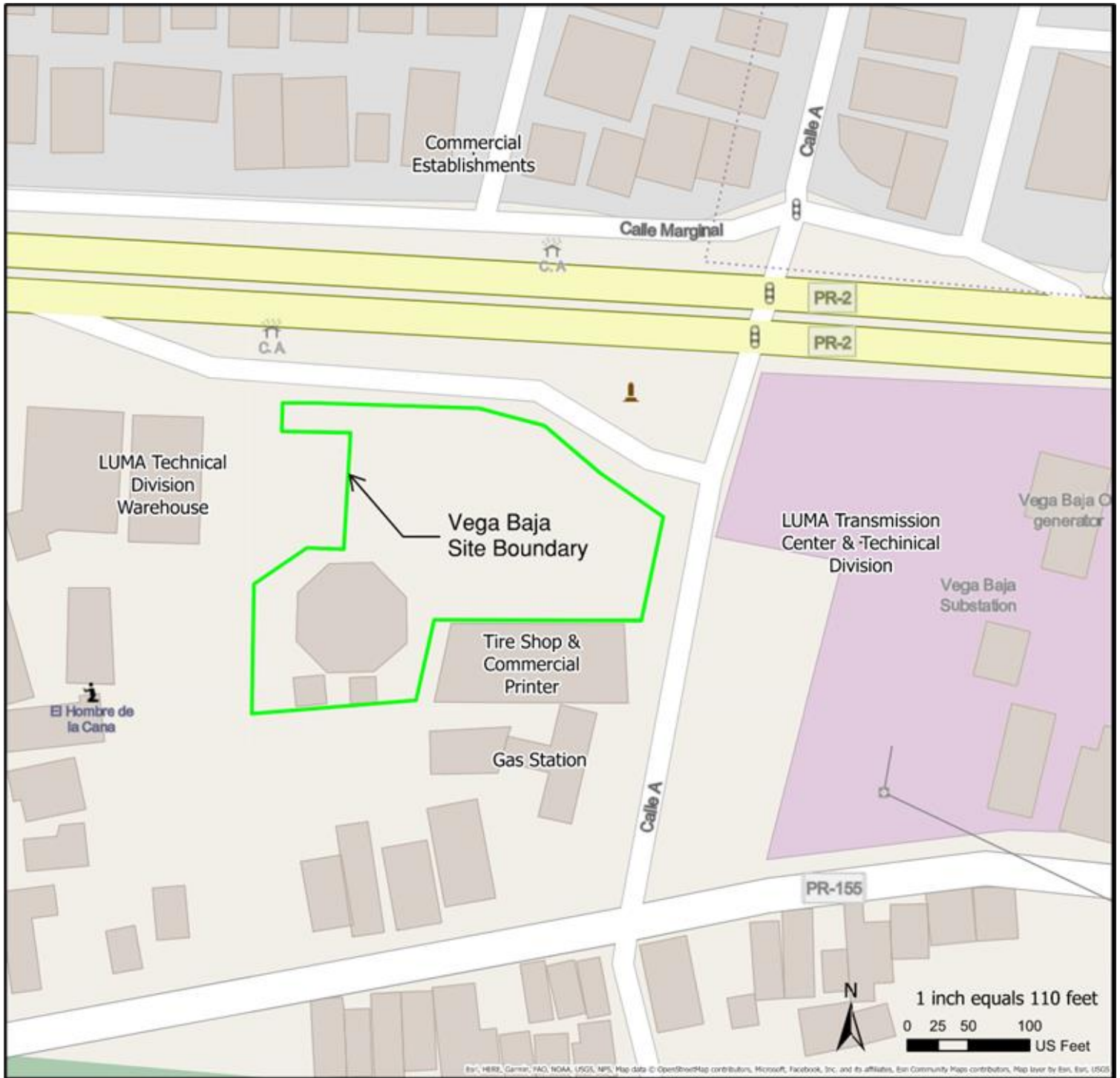
September/October Public information meetings (4.1.3)

November/December: start of decommissioning process. Groundbreaking event on site with elected officials, community leaders and media. The preliminary budget is

\$10k, will be using a third-party agency. Budget to be adjusted accordingly.

March/April 2025: Inauguration event on site with elected officials, community leaders and media. The preliminary budget is \$10k, will be using a third-party agency. Budget to be adjusted accordingly.

## **FIGURES**

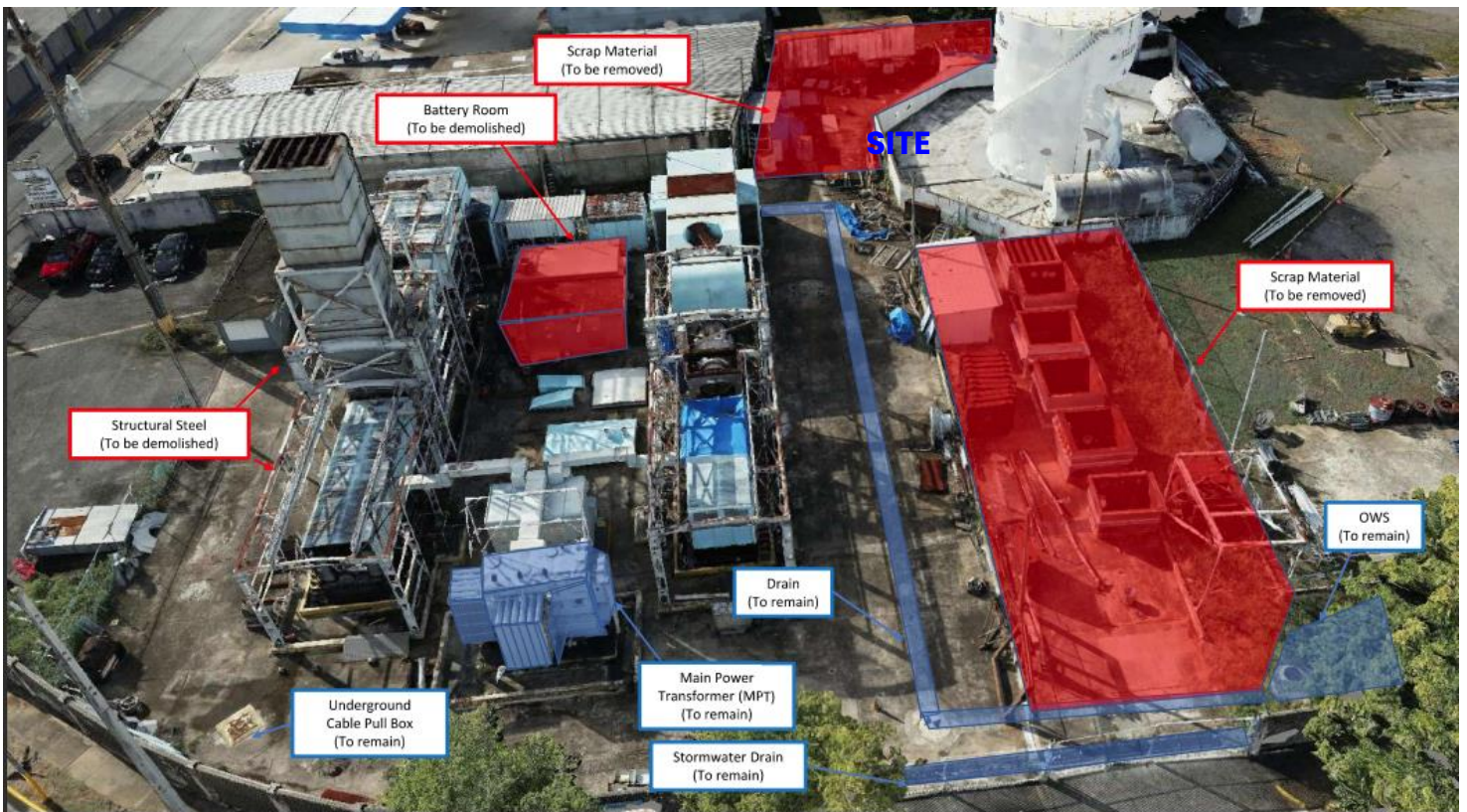




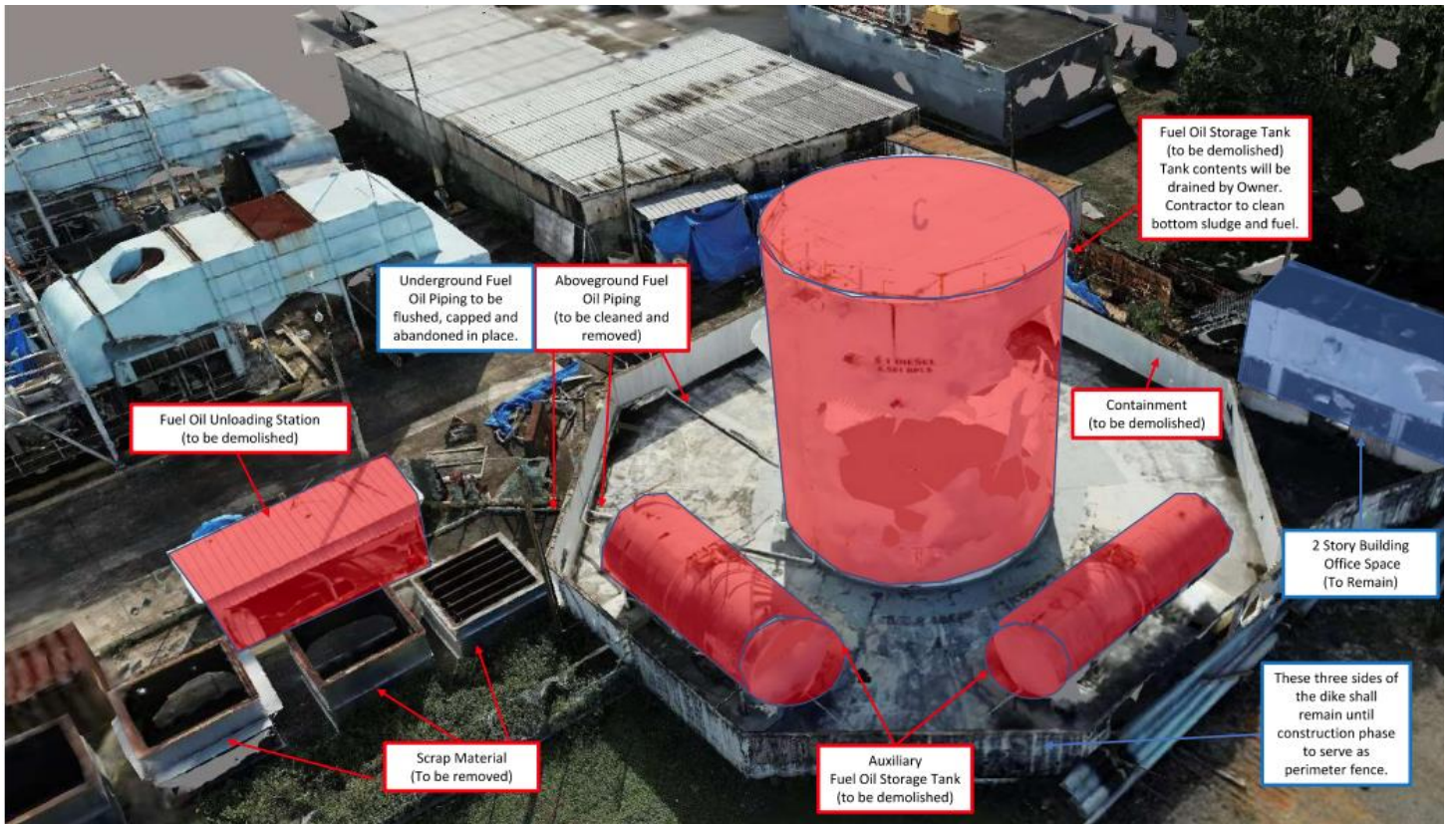
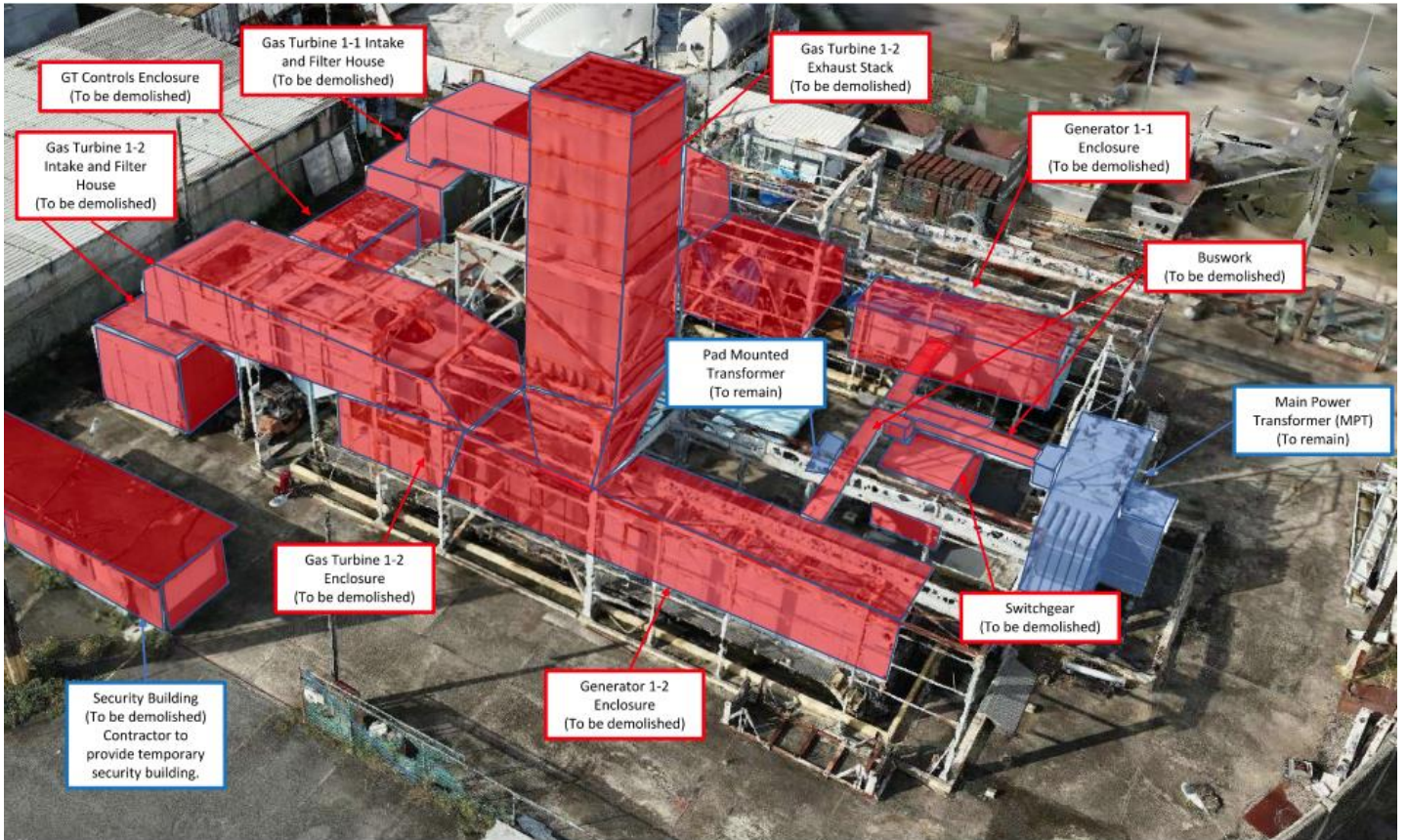
#### Overview of Vega Baja Power Plant

- All identified above Top of Concrete (TOC) equipment and structures within the property line are to be removed.
- All scrap material is to be removed from plant site. The Contractor shall have ownership of the material once after it is removed from the site.
- Prior to commencement of demolition activities, the Owner shall empty contents from the Fuel Oil, Lubricating Oil storage tanks and Closed Loop Cooling Water Systems.
- The Contractor shall clean all equipment, components and structure surfaces in contact with liquid fuels, lubricating oils and other chemicals (if applicable) prior to disposal.
- Contractor shall confirm with the Owner the de-energization of all equipment.
- Contractor shall test for lead and asbestos.
- Contractor shall remove liquid fuels, lubricating oils, and other chemicals (if applicable) for all exposed surfaces to remain. Surfaces shall be left clean of all these substances.

#### DDR-001 Decommissioning and Dismantling of Vega Baja Power Plant













MARCH 2024



## GeneraPR BATTERY BUZZ

At Genera, we are working on a short-term plan to create a resilient power generation system for Puerto Rico. One important component of this plan is the development of a battery energy storage system (BESS) that can help stabilize the grid by absorbing excess power during periods of high production and releasing it during periods of high demand. The operation of these batteries will significantly reduce load relays triggered by generation issues, offer ultra-fast generation reserve, and provide cost-effective energy storage. This will minimize reliance on expensive and polluting fuels and contribute to overall grid stability and efficiency. Genera plans to install 430 MW of battery energy storage systems across 7 existing facilities, and we have already started!



### PURCHASING EQUIPMENT

On January 5, Genera released a request for proposals for the purchase of the battery energy storage system needed for this project. Over 95 participants from all over the world registered interest in this event. These companies have until March 22nd to submit a proposal to Genera who will decide on the technology that best aligns with the needs of the island's grid and unique conditions. By 2025, Genera expects to have the first site turned on.



### FUNDING

Genera estimates that the BESS project will cost approximately \$700 million USD. This includes preparing the power plants that are going to be beneficiaries of this project, procuring the battery equipment, installing this equipment, and turning the sites on.



### PROJECT BENEFITS

- Enhances the system's resiliency by co-locating batteries with conventional generation technology.
- Reduces forced outages.
- Reduces manual load shedding by 90%.
- Increases resiliency.
- Accelerates the integration of renewables.
- Optimizes federal funds.

Stay in Touch!

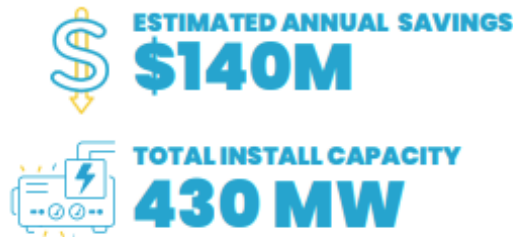


<https://genera-pr.com/>



@Genera\_PR

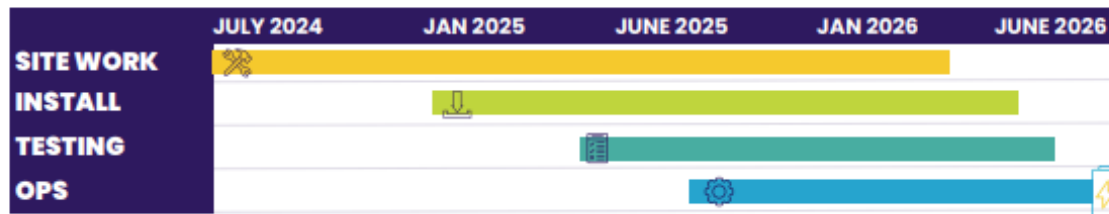
## PROJECT HIGHLIGHTS



## SERVICES PROVIDED

- ✓ Fast Spinning Reserve
- ✓ Frequency Regulation
- ✓ Load Balance
- ✓ Energy Storage
- ✓ Voltage Support
- ✓ Black Start

## PROJECT TIMELINE



## WHAT'S BUZZING AROUND THE WORLD?

Similar projects worldwide:

**MOSS LANDING BESS**  
750 MW | 3,000 MWh  
COD: 2020  
Equipment: LG JH4 cells/Tesla  
California, US

**FPL MANATEE ENERGY STORAGE CENTER**  
409 MW | 900 MWh  
COD: 2021  
Equipment: 132 battery storage containers  
Florida, US

**WÄRTSILÄ QUANTUM HIGH ENERGY BESS**  
300 MW | 600 MWh  
Expected COD: 2025  
Equipment: 306Ah lithium-ion battery cells  
Scotland, UK

Stay in Touch!



<https://genera-pr.com/>



@Genera\_PR

## **Appendixes**

## **APPENDIX A**

### **Glossary of Terms and Acronyms**

## **APPENDIX B**

### **List of Contacts and Interested Parties**

## Appendix C. Budget Estimate Summary

### Estimated Decommissioning Expenses Summary

Phase	Activity	Total (USD)
1	Permitting Application Fees	\$123,000
2	Community Engagement	\$20,000
2	Geophysical Survey	\$18,350
2	Lead & Asbestos Testing (Cost for abatement is not included)	\$20,000
2	Protective Measures, Salvage Work, and Site Disconnections (20% of total decommissioning cost estimate)	\$330,890
2	Pre-Demolition Activities by Contractor	\$305,000
2	Pre-Demolition Activities by Genera	\$180,691
2	Contingency (environmental remediation activities, delays, etc.)	\$595,602
3	Above-Ground Dismantling and Demolition (Does not include costs for abatement and/or disposal of hazardous waste)	\$655,411
–	Project Management	\$332,000
<b>Total</b>		<b>\$2,580,944</b>

Notes:

1) Pre-Demolition Activities by Contractor include removal of batteries, transformers, generators, oil/fuel pumps and tanks, and wheel mounted trailer.

2) Pre-Demolition Activities by Genera PR includes de-energization of electrical circuits, removal of salvageable components, control systems, operational site pumps, and loose barrels.

3) Contingency allowance of 30% for potential delays and cost overruns due to unforeseen environmental issues, such as the discovery of hazardous materials or contamination (i.e., lead, asbestos, water contamination, fuel spills, etc.)



## Appendix D. Detailed Budget Estimates

### Vega Baja Power Plant Decommissioning Detailed Cost Estimate Summary

Decommissioning Plan Section	Description	Subcontractor Cost	Material	Labor Cost	Construction Equipment	Total Cost (USD)
3	Community Engagement	\$ 20,000	\$ -	\$ -	\$ -	\$ 20,000
3	<i>Section 3 Subtotal</i>	\$ 20,000	\$ -	\$ -	\$ -	\$ 20,000
4	Environment and Permitting	\$ 123,000	\$ -	\$ -	\$ -	\$ 123,000
4	<i>Section 4 Subtotal</i>	\$ 123,000	\$ -	\$ -	\$ -	\$ 123,000
5	Protective Measures, Salvage Work, and Site Disconnections by Genera	\$ -	\$ -	\$ 330,890	\$ -	\$ 330,890
5	<i>Section 5 Subtotal</i>	\$ -	\$ -	\$ 330,890	\$ -	\$ 330,890
6	<i>Dismantling, Demolition, &amp; Site Restoration</i>					
6.1.1	Geotechnical and Geophysical Surveys	\$ 18,350	\$ -	\$ -	\$ -	\$ 18,350
6.1.1	Civil Work	\$ 71,308	\$ -	\$ 18,531	\$ 28,724	\$ 118,563
6.1.1	Concrete	\$ -	\$ -	\$ 43,199	\$ 31,874	\$ 75,073
6.1.1	Steel	\$ -	\$ -	\$ 1,785	\$ 1,106	\$ 2,891
6.1.1	Architectural	\$ -	\$ -	\$ 3,302	\$ 3,582	\$ 6,884
6.1.1	Structural Item Removals (including batteries)	\$ -	\$ -	\$ 37,500	\$ 36,780	\$ 74,280
6.1.1	Mechanical Equipment	\$ -	\$ -	\$ 24,321	\$ 23,854	\$ 48,175
6.1.1	Piping	\$ -	\$ 2,000	\$ 3,911	\$ 3,160	\$ 9,071
6.1.1	Electrical Equipment	\$ -	\$ -	\$ 891	\$ 874	\$ 1,765
6.1.1	Raceway, Cable Tray, & Conduit	\$ -	\$ -	\$ 313	\$ 306	\$ 619
6.1.1	Cable	\$ -	\$ -	\$ 500	\$ 490	\$ 990
6.1.1	Remove/Clean Fuel & Sludge in Fuel Oil Storage Tanks	\$ 40,000	\$ -	\$ -	\$ -	\$ 40,000
6.1.1	Labor Supervision	\$ 8,300	\$ -	\$ -	\$ -	\$ 8,300
6.1.1	Show-Up Time	\$ 2,800	\$ -	\$ -	\$ -	\$ 2,800
6.1.1	Construction Management	\$ 30,100	\$ -	\$ -	\$ -	\$ 30,100
6.1.1	Field Office Expenses	\$ 3,300	\$ -	\$ -	\$ -	\$ 3,300
6.1.1	Safety	\$ 3,000	\$ -	\$ -	\$ -	\$ 3,000
6.1.1	Temporary Facilities	\$ 2,300	\$ -	\$ -	\$ -	\$ 2,300
6.1.1	Mobilization / Demobilization	\$ 2,400	\$ -	\$ -	\$ -	\$ 2,400
6.1.1	Legal Expenses / Claims	\$ 400	\$ -	\$ -	\$ -	\$ 400
6.1.1	Small Tools & Consumables	\$ 1,500	\$ -	\$ -	\$ -	\$ 1,500
6.1.1	General Liability Insurance	\$ 1,500	\$ -	\$ -	\$ -	\$ 1,500
6.1.1	Construction Equipment Mob/Demob	\$ 13,500	\$ -	\$ -	\$ -	\$ 13,500
6.1.1	Freight on Material	\$ 100	\$ -	\$ -	\$ -	\$ 100
6.1.1	Contractors G&A	\$ 35,500	\$ -	\$ -	\$ -	\$ 35,500
6.1.1	Contractors Profit	\$ 50,800	\$ -	\$ -	\$ -	\$ 50,800
6.1.1	Contingency (Labor, Material, Equipment, Subcontractor)	\$ 121,600	\$ -	\$ -	\$ -	\$ 121,600
6	<i>Section 6 Subtotal</i>	\$ 406,758	\$ 2,000	\$ 134,253	\$ 130,750	\$ 673,761
7	<i>Decontamination, Waste Disposal, and Remediation</i>					
7.1	Lead and Asbestos (Testing Only)	\$ 20,000	\$ -	\$ -	\$ -	\$ 20,000
7.1	Contingency (environmental delays, remediation, etc.)	\$ 595,602				\$ 595,602
7	<i>Section 7 Subtotal</i>	\$ 615,602	\$ -	\$ -	\$ -	\$ 615,602
8	Pre-Demolition Activities by Genera	\$ -	\$ -	\$ 180,691	\$ -	\$ 180,691
8	Pre-Demolition Activities by Contractor	\$ 305,000	\$ -	\$ -	\$ -	\$ 305,000
8	<i>Section 8 Subtotal</i>	\$ 305,000	\$ -	\$ 180,691	\$ -	\$ 485,691
9	Health, Safety, Security, and Quality Management (included in Section 6 costs)	\$ -	\$ -	\$ -	\$ -	\$ -
9	<i>Section 9 Subtotal</i>	\$ -	\$ -	\$ -	\$ -	\$ -
12	Construction and Project Management	\$ -	\$ -	\$ 332,000	\$ -	\$ 332,000
12	<i>Section 12 Subtotal</i>	\$ -	\$ -	\$ 332,000	\$ -	\$ 332,000
	<b>Total Decommissioning Plan Cost</b>	<b>\$ 1,470,360</b>	<b>\$ 2,000</b>	<b>\$ 977,834</b>	<b>\$ 130,750</b>	<b>\$ 2,580,944</b>

## Appendix E. Monthly Cashflow of Demolition Activities



Decommission Plan for Vega Baja - Monthly Cashflow of Demolition Activities

Strictly Confidential

Activity ID	Description	Duration (Months)	Cost	1	2	3	4	5
<b>Administrative</b>								
1	Project Management	5	\$225,760	\$53,120	\$53,120	\$53,120	\$53,120	\$13,280
2	<b>Total Administrative (A)</b>		\$225,760	\$53,120	\$53,120	\$53,120	\$53,120	\$13,280
<b>Phase 2: Pre-Demolition Activities**</b>								
3	Demolition NTP	1	-	-	-	-	-	-
4	Lead & Asbestos Testing	1	\$20,000	\$20,000	-	-	-	-
5	Remove Asbestos & Lead based Paint	1	-	-	-	-	-	-
6	Certification of Site Readiness for Demolition	1	-	-	-	-	-	-
7	Protective Measures, Salvage Work, and Site Disconnections	2	\$330,890	-	\$264,712	\$66,178	-	-
8	<b>Total Phase 2: Pre-Demolition Activities** (B)</b>		\$350,890	\$20,000	\$264,712	\$66,178	-	-
<b>Phase 3: Above-Ground Dismantling and Demolition Activities</b>								
9	Demolition Contractor Mobilization	1	\$2,400	\$2,400	-	-	-	-
10	Demolition of 15,000 Gal. Auxiliary Storage Tank	1	\$46,644	-	-	\$46,644	-	-
11	Demolition of 10,000 Gal. Auxiliary Storage Tank	1	\$46,644	-	-	\$46,644	-	-
12	Demolition of Fuel Storage Tank	1	\$46,644	-	-	\$46,644	-	-
13	Demolition of Telecom Steel Monopole (Required Coord. w/ LUMA)	1	\$23,322	-	-	\$23,322	-	-
14	Protection of Equipment and Hazard Removal	1	\$23,322	-	-	\$23,322	-	-
15	Gas Turbine & Exhaust Stack 1-1	2	\$69,965	-	-	\$46,644	\$23,322	-
16	Gas Turbine & Exhaust Stack 1-2	2	\$69,965	-	-	\$46,644	\$23,322	-
17	30' x 30' Building	1	\$46,644	-	-	-	\$46,644	-
18	Demolition of Fuel Unloading	1	\$23,322	-	-	-	\$23,322	-
19	Demolition of Oil-Water Separator	1	\$23,322	-	-	-	\$23,322	-
20	Truck Unloading Station	1	\$23,322	-	-	-	\$23,322	-
21	Demolition of Security Building	1	\$46,644	-	-	-	\$46,644	-
22	GT Control Building	1	\$23,322	-	-	-	\$23,322	-
23	Demolition of Storage Area	1	\$23,322	-	-	-	\$23,322	-
24	Demolition of Wheel Mounted Trailer	1	\$23,322	-	-	-	\$23,322	-
25	Battery Room	1	\$23,322	-	-	-	\$23,322	-
26	15 KV Switchgear and NON-SEG Phase Busduct	1	\$23,322	-	-	-	-	\$23,322
27	Plant Area Lighting	1	\$23,322	-	-	-	-	\$23,322
28	Cleanup and Demobilization of Vega Baja	1	\$23,322	-	-	-	-	\$23,322
29	<b>Total Phase 3: Above-Ground Dismantling and Demolition Activities (C)</b>		\$655,411	\$2,400	-	\$279,862	\$303,184	\$69,965
30	<b>Total Demolition Cost (A) + (B) + (C)</b>		<b>\$1,232,061</b>	<b>\$75,520</b>	<b>\$317,832</b>	<b>\$399,160</b>	<b>\$356,304</b>	<b>\$83,245</b>

**Notes**

- \*Assumes the estimated cost of the Activity "Project Management" for the 5-months of the Demolition Works
- \*\*The Phase 2 presented on this Cashflow only includes costs for Asbestos & Lead Survey and Protective Measures, Salvage Work, and Site Disconnections. Activities not included at this stage fall outside the 5-month range of the Demolition Works.

## Appendix F. Demolition Timeline

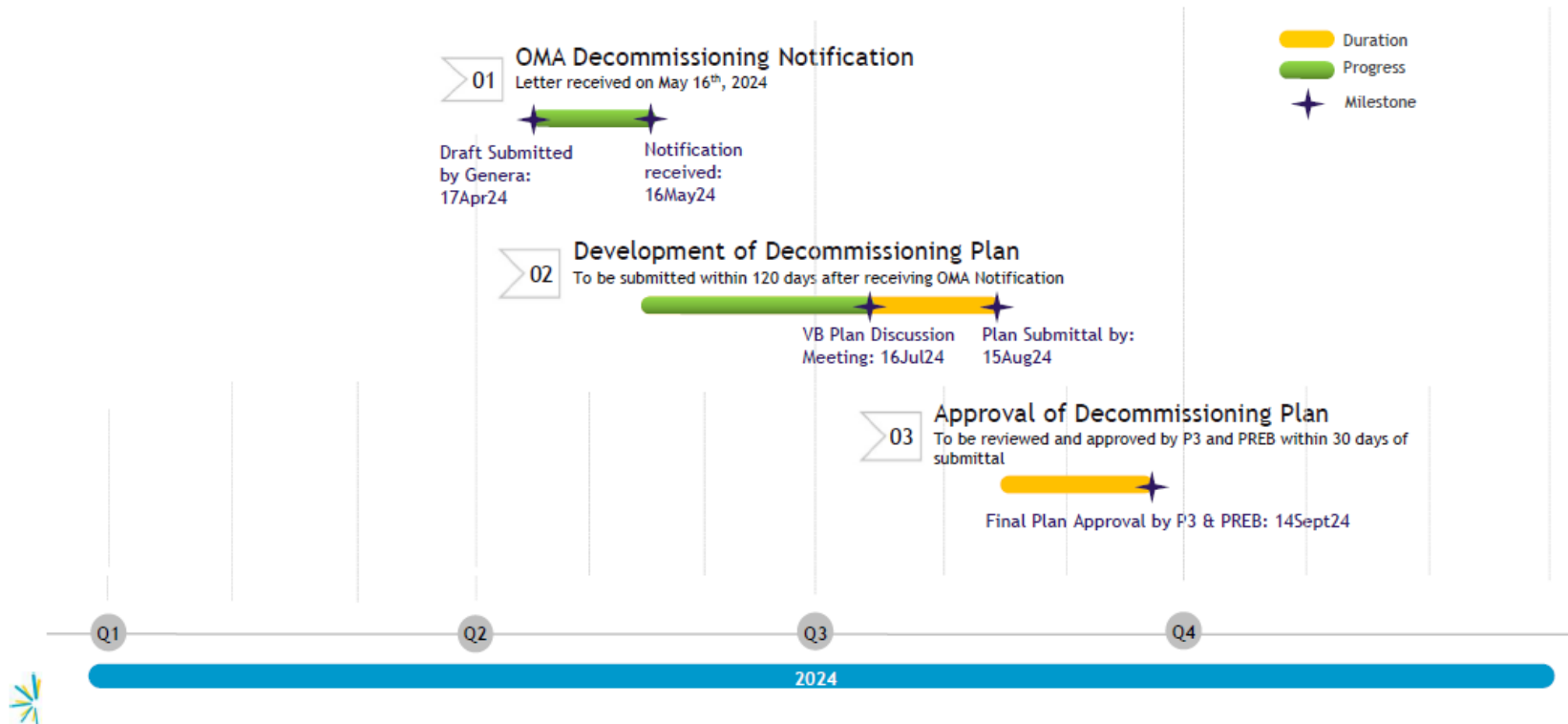


### VEGA BAJA - DEMOLITION TIMELINE

			WEEK	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29
Activity ID	Description	DURATION (WEEK)																														
1	Demolition NTP	1																														
2	Demolition Contractor Mobilization	1																														
3	Asbestos & Lead Survey by Contractor	2																														
4	Remove Asbestos & Lead based Paint	4																														
5	Contingency for Removal of Hazardous Materials	13																														
6	Certification of Site Readiness for Demo	1																														
7	Demolition Site Layout, Protection & Erosion Control	5																														
Above Ground Demolition Activities																																
8	Demolition of 15,000 Gal. Auxiliary Storage Tank	2																														
9	Demolition of 10,000 Gal. Auxiliary Storage Tank	2																														
10	Demolition of Fuel Storage Tank	2																														
11	Demolition of Telecom Steel Monopole (Required Coord. w/ LUMA)	1																														
12	Protection of Equipment and Hazard Removal	1																														
13	Gas Turbine & Exhaust Stack 1-1	3																														
14	Gas Turbine & Exhaust Stack 1-2	3																														
15	30' x 30' Building	2																														
16	Demolition of Fuel Unloading	1																														
17	Demolition of Oil-Water Separator	1																														
18	Truck Unloading Station	1																														
19	Demolition of Security Building	2																														
20	GT Control Building	1																														
21	Demolition of Storage Area	1																														
22	Demolition of Wheel Mounted Trailer	1																														
23	Battery Room	1																														
24	15 KV Switchgear and NON-SEG Phase Busduct	1																														
25	Plant Area Lighting	1																														
26	Cleanup and Demobilization of Vega Baia	1																														

# Vega Baja Decommissioning – Plan Development Timeline

*This timeline assumes that Genera will submit a Final Decommission Plan by August 15<sup>th</sup> for PREB's revision and that it takes PREB 30 days to approve*



**Exhibit B**

Responses to the Energy Bureau's Staff Comments

Docket Number: NEPR-MI-2024-0003

In Re: Request for Approval of the Vega Baja Decommissioning Plan

**Re: Final Decommissioning Plan in Compliance with the June 27<sup>th</sup> Resolution and Responses to the Energy Bureau July 23, 2024 letter**

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**GPR-PREB-NEPRMI20240003-20240805-#1**

1. The Decommissioning Plan must outline the specific roles and responsibilities of LUMA, PREPA (PR Electric Power Authority) and the P3 Authority. This includes but is not limited to, a discussion of the Decommissioning Plan Notice issued by the P3 Authority and LUMA's recommendations. These documents shall also be incorporated into the Decommissioning Plan.

**Response:**

Appendix A of the Decommissioning Plan includes the Decommissioning Plan Notice issued by the P3 Authority.

- a. LUMA as Operator of the Puerto Rico Transmission and Distribution System ("T&D System"), is responsible for coordinating all generation unit's retirement requests, as stipulated in Section 3.3 of the System Operation Principles ("SOP"), submitted to the Energy Bureau on February 23, 2021, and conditionally approved on May 31, 2021, through docket NEPR-MI-2021-0001.

LUMA upon receiving pertinent information, evaluates how the retirement of a unit will impact the system, customers, regulatory policies, among others, and submits a motion and recommendation to the Energy Bureau for their review. The Energy Bureau then determines if the unit is approved to be retired based on the evaluation mentioned. If the unit is not approved to be retired, the unit

will be designated as a Reliability-Must-Run (“RMR”) unit. A retirement request can be resubmitted after the identified impact of the unit retirement has been addressed.

This process must also be aligned with Article 16 of the LGA OMA.

- a. P3 Authority (acting on behalf of PREPA and considering the Integrated Resource Plan, and in consultation with PREB and T&D Operator) may deliver to Operator a decommissioning notice to commence Decommissioning Services for one or more of the Legacy Generation Assets.

**GPR–PREB–NEPRMI20240003–20240805–#2**

2. The Decommissioning Plan must include the updated proposed schedule as outlined in Genera’s presentation dated July 16, 2024. For clarity, this should encompass all available details on the timing of each decommissioning step, along with a Gantt chart illustrating the decommissioning activities, including procurement activities.

**Response:**

Please see Appendix F. Decommissioning Timelines.



**GPR-PREB-NEPRMI20240003-20240805-#3**

3. The Decommissioning Plan must include an updated proposed Decommissioning Budget, as outlined in Genera's presentation dated July 16, 2024, accompanied by a comprehensive discussion of the activities anticipated to impact the proposed Decommissioning Budget. Additionally, the plan should outline the measures Genera intends to implement to mitigate the risks of budget overruns.

**Response:**

Please refer to:

Appendix C. Budget Estimate Summary.

Appendix D. Detailed Budget Estimates.

Decommissioning Plan – Section 7.2. 10 Contract Strategy.

**GPR-PREB-NEPRMI20240003-20240805-#4**

4. The Decommissioning Plan must explicitly detail the sources of all funds constituting the Decommissioning Budget, including any matching funds required under applicable FEMA (Federal Emergency Management Agency) or other federal programs

**Response:**

These details can be found in the Decommissioning Plan -Section 7.1 Decommissioning Budget Summary.

**GPR-PREB-NEPRMI20240003-20240805-#5**

5. The Decommissioning Budget, as included in the Decommissioning Plan., must contain proposed monthly expenditure budgets and cash flow projections for each applicable Contract Year during which the Decommissioning Services outlined in the Decommissioning Plan are anticipated to be provided.

**Response:**

Please see Appendix E. Monthly Budget Estimate.

**GPR-PREB-NEPRMI20240003-20240805-#6**

6. The Decommissioning Plan must include an explanation indicating whether the estimated Decommissioning Budget exceeds the total cost associated with performing O&M Services for the Legacy Generation Asset (Vega Baja Facility), including the O&M Fixed Fee Adjustment as specified in Section I of Annex II (Compensation – O&M Fixed Fee).

**Response:**

Per item 6 of the July 23 Letter, PREB is requesting – and the LGA O&M Agreement requires – that Genera identify the O&M Services costs currently included in the budget for Vega Baja Units 1 and 2, as well as the O&M Fixed Fee adjustment for these units that will take effect in Contract Year 6. Genera confirms that there were no actual costs or direct expenses for Vega Baja Units 1 and 2 in the years 2023 and 2024. The O&M Fixed Fee adjustment for these units will be determined in Contract Year 5 given the O&M Fixed Fee is subject to the CPI Adjustment factor in the LGA O&M Agreement. Genera will provide their estimate and Budget impact to the Authority prior to submitting their Budget for Contract Year.

**GPR-PREB-NEPRMI20240003-20240805-#7**

7. The Decommissioning Plan must include a detailed discussion on the applicable decommissioning cost efficiencies as outlined in Section III.C (Decommissioning Cost Efficiency) of Annex II (Compensation – Incentives and Penalties for Decommissioning Services Categories) of the Generation OMA. This discussion should also encompass any agreements reached with the P3A regarding incentives and penalties, and clearly state whether Genera proposes to receive incentives if the project is partially or entirely federally funded.

**Response:**

Penalties – In its Preliminary Draft Plan, Genera notes that, per the LGA O&M Agreement, if Decommissioning Services are not completed by the applicable Decommissioning Completion Date, the Operator is subject to a Decommissioning Penalty of \$1,000,000 per week for each week or for any portion of a week on a Pro Rata basis, up to a maximum of \$15,000,000 in the aggregate across all LGAs for each Contract Year. P3A agrees with this assertion. P3A further agrees with the Minimum Performance Threshold in the Preliminary Draft Plan, as it comports with Annex II of the LGA O&M Agreement.

Incentives – P3A agrees that incentives should be paid for the Vega Baja Decommissioning Services pursuant to Annex II of the LGA O&M Agreement and as set out in the Preliminary Draft Plan – regardless of whether the Services are partially or entirely federally funded. Per Annex II III.C. 1. of the LGA O&M Agreement, if Genera achieves the PREB approved schedule for completion of decommissioning for Units 1 and 2, Genera will be eligible to receive a Decommissioning Incentive Payment based on 50% of the savings achieved between actual documented total costs, irrespective of how they are ultimately funded/paid for, as compared to the PREB approved Decommissioning Budget, subject to the Annual Incentive Cap. P3A also agrees with the measurement

parameter listed in the Preliminary Draft Plan, as it comports with Annex II of the LGA O&M Agreement.

**GPR-PREB-NEPRMI20240003-20240805-#8**

8. The Decommissioning Plan shall include detailed mechanisms that Genera and P3A will implement to amend or adjust the Decommissioning Budget or the related incentives and Penalties for the reasons stated in Section 16.2(b) (Decommissioning Budget Policy) of the Generation OMA.

**Response:**

Genera confirms that there were no actual or documented costs related to Vega Baja, so no budget adjustment is required at this point. To the extent there are any incentives earned after agreement with the Authority, those amounts should be factored into Genera's FY2026 budget request to PREB.

P3A requests Genera acknowledge the agreed terms contained herein. In doing so, it is both parties' intention that the PREB may then expeditiously evaluate the final decommissioning plan for the Vega Baja facility.

**GPR-PREB-NEPRMI20240003-20240805-#9**

9. Notwithstanding any other applicable reporting requirements, the Decommissioning Plan must include provisions for submitting at least quarterly reports to the Energy Bureau and P3A on the progress of the decommissioning project, beginning from the date of the plan's approval by the Energy Bureau. The quarterly reports on the decommissioning project must include, at a minimum, the following information: (i) detailed updates on the completion of key project milestones and any deviations from the original schedule, (ii) an overview of the expenditures to date, including a comparison with the budgeted amounts and an explanation of any variances, (iii) a description of the work completed during the reporting period, including a summary of decommissioning activities and any issues encountered, (iv) an outline of planned activities for the next reporting period, including anticipated challenges and strategies for addressing them and, (v) confirmation of compliance with all relevant regulatory requirements during the reporting period.

**Response:**

Decommissioning Plan- Section 11.1. Reporting Requirements.