

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

**NEPR**

**Received:**

**Sep 24, 2024**

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**IN RE:** REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN – DECEMBER 2020 **CASE NO.:** NEPR-MI-2021-0002

**MOTION TO SUBMIT PREPA'S SEPTEMBER 2024 UPDATE TO THE PREPA-LUMA 90-DAY PLAN**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COMES NOW** the Puerto Rico Electric Power Authority ("PREPA"), through its counsel of record, and respectfully submits and prays as follows:

1. On March 26, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("March 26 Order") requiring PREPA to report, over the following five years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau.
2. Subsequently, on July 15, 2021, LUMA Energy, LLC and LUMA ServCo, LLC ("LUMA") filed a Motion before this Bureau titled Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021, and Requesting Approvals of Matters Presented and Proposed during the Technical Conference ("July 15 Motion"). In this Motion, LUMA proposed, among other things, that the quarterly reporting in this docket be maintained and that updates to the 90-Day Plan, in relation to the 10-Year Infrastructure Plan, be provided during the last month of every quarter, as done with FEMA.

3. On September 21, 2021, PREPA and LUMA filed a joint motion titled Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan ("September 21 Motion"). In this filing, LUMA and PREPA informed that in the future, they would continue to file the PREPA-LUMA 90-Day Plans instead of 90-Day updates of the 10-Year Infrastructure Plan given that FEMA was only requiring the 90-Day Plans.
4. In compliance with the previously stated, PREPA hereby submits as Exhibit 1 to this Motion, the September 2024 update to the PREPA-LUMA 90-Day Plan. This plan also includes information on areas of coordination among PREPA, LUMA, and Genera, specific areas of focus of each entity, and an overview of key next steps for the upcoming 90 days in relation to the 10-Year Infrastructure Plan.

**WHEREFORE**, PREPA respectfully requests that the Energy Bureau take notice of the aforementioned and accept the September 2024 PREPA-LUMA 90-Day Plan.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on the 24<sup>th</sup> day of September 2024.

**CERTIFICATE OF SERVICE:** We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and courtesy copies were sent via e-mail to LUMA Energy, LLC through its counsels of record at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com), [laura.rozas@dlapiper.com](mailto:laura.rozas@dlapiper.com), [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com),

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**Exhibit 1**

September 2024 PREPA-LUMA 90-Day Plan



FEMA



# PREPA-LUMA- Genera 90-Day Plan

September 2024



Puerto Rico Electric  
Power Authority

CENTRAL OFFICE FOR RECOVERY,  
RECONSTRUCTION AND RESILIENCY  
**COR3**





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## I. Introduction

In accordance with the directive received from Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for Puerto Rico Electric Power Authority's (PREPA) T&D System as outlined within the Operations and Maintenance Agreement (OMA) between PREPA, Puerto Rico Public-Private Partnership Authority (P3A), and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and are now the responsibility of LUMA.

On July 1, 2023, GeneraPR assumed overall responsibilities for PREPA's Generation System as outlined within the OMA between PREPA, P3A, and Genera. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Dams, Hydro, and Irrigation asset categories; while projects in the Generation asset categories ("Generation Projects") were transitioned to and are now the responsibility of GeneraPR.

This 90-Day Plan provides information on areas of coordination among PREPA, LUMA, and Genera, as well as focus areas specific to each.

## II. Overview of Focus Areas for the Next 90-Days

The content below summarizes next steps across the following seven areas: 1) Federal Grant Management; 2) Environmental and Historic Preservation (EHP); 3) Engineering Management; and 4) Enterprise Project Management (EPM).

### **PREPA Resiliency Plan and Water Asset BCA**

#### PREPA Focus Area

- PREPA received comments and is developing a revision on the resiliency plan provided to the Central Office of Recovery, Reconstruction, and Resiliency (COR3) in December of 2023, which detailed the following information and updated the document accordingly:
  - Failure to consider water assets within the Island-wide Benefit Cost Analysis (IWBCA):
  - FEMA omission of the Bipartisan Budget Act (BBA) implementation and funding towards water assets (\$0 approved for water asset BBA).



- General goals of resiliency plan (resiliency strategy)
  - Targets items considered within the IWBCA:
    - Grid resiliency (hydroelectric plants)
  - Targets items not considered within the IWBCA:
    - Life safety (dam repairs and mitigation, early warning system)
    - Loss of water function (conveyance system repairs of irrigation and hydroelectric systems)
    - Reduction in flooding (reservoir capacity, conveyance system repairs, dam strengthening)
    - Evacuees (dam strengthening and conveyance system repairs)
  - Effectiveness of resiliency plan is 85.51%
    - Before mitigation impact: **\$59,673,180,567**
    - Post mitigation impact: **\$8,647,866,329**
- PREPA is revising the information based on FEMA and COR3 comments.

## Federal Grant Management

### PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3, and FEMA for compliance with EHP requirements.
  - PREPA is working alongside FEMA and COR3 to organize approved SOWs into logical grouping for Project Formulation submissions (*Detailed SOWs*).
  - The logical grouping of SOWs considers EHP limitations to evaluate all environmental impacts under one area.
  - PREPA continues to revise *Detailed SOWs* (DSOW) in accordance with FEMA 406-Mitigation and EHP feedback and comments.
    - In the past quarter PREPA (re)submitted a total of five (5) FEMA FAASt projects (*DSOWs & 406-Hazard Mitigation Proposals*) including:
      - Toro Negro Hydroelectric System,
      - Dams Minor Repairs,
      - Guayabal Dam Repair and Mitigation Project,
      - South Coast Irrigation District (also referred to as FAASt South Coast Irrigation District – Canals),
      - BONUS Nuclear Plant,
    - Of the projects noted above, PREPA and FEMA advanced three (3) projects to the Consolidated Resource Center (CRC) for cost and scope validation.



- Toro Negro Hydroelectric System,
- Guayabal Dam Repair and Mitigation Project,
- BONUS Nuclear Plant
- PREPA continued the development and expects to submit the first or second iterations of DSOWs for the following projects, with consideration of 406-Mitigation proposals and relevant EHP information.
  - Lajas Irrigation District Project (also referred to as FAASt Lajas Irrigation Canals),
  - Isabela Irrigation District Project (also referred to as FAASt Isabela Irrigation District),
  - Rio Blanco Hydroelectric System,
  - Dos Bocas Reservoir Dredging – mitigation strategy will be provided by this quarter to facilitate design.
  - Guamani/Tres Cuartitos Project (DR-4671-Fiona),
  - Carite Spillway (DR-4671-Fiona),
- Detailed SOWs will be resubmitted in accordance as requested by FEMA for the following projects and/or are pending approval. This effort included 406 Hazard Mitigation and EHP work. PREPA anticipates advancing these projects to the CRC based on any received FEMA final comments for the 406-Mitigation section and EHP sections:
  - Dams Minor Repairs - pending potential resubmission based on FEMA final comments to HMP justifications,
  - South Coast Irrigation District - pending potential resubmission based on FEMA final comments to HMP justifications,
  - Rio Blanco Hydroelectric System – pending a subsequent follow-up site visits and information from the design team in order to comply with the information necessary for EHP review.
- PREPA will work with FEMA to respond promptly to any outstanding RFIs.
  - This quarter PREPA has responded to RFIs for three projects:
    - Guayabal Dam
    - Caonillas Dam
    - BONUS Nuclear Plant
- FEMA Hazard Mitigation Grant Program (HMGP) and Housing and Urban Development (HUD) funded projects were advanced including overarching components of packages
  - The evaluation of potential impacts on ten (10) percent cost-share



- match funding from Community Development Block Grants-Disaster Recovery (CDBG-DR) and the central government is ongoing. Energy Grid Rehabilitation and Reconstruction (ER-1) model projects for the non-federal match have been identified and provided to Puerto Rico Department of Housing (PRDOH/Vivienda).
- The grant application process was advanced for Patillas Dam Seismic Retrofit 404/CDBG-Mitigation project, including,
    - Weekly meetings are held with the US Bureau of Reclamation (USBR) to reengage and coordinate the 30% design phase of the project
      - PMP is finalized and will be approved no later than June 13, 2024
      - Drilling for dewatering tests and reports are continuing.
    - An updated draft EA shall be provided to Vivienda and FEMA in September/October of 2024.
  - PREPA received ineligibility reviews from PRDOH for ER2 project.
    - PREPA responded with a reconsideration letter in August of 2024.
    - COR3 provided a subsequent Program-Based Reconsideration Denial with a 20-calendar day response.
    - PREPA intends to respond to the denial of the following projects:
      - Battery Energy Storage System (BESS) Project
      - New Hydro-Electric Plants Project
  - COR3 submitted appeals for two DR-4671 Hurricane Fiona Hydroelectric Projects denials.
  - PREPA will submit progress and financial quarterly reports for period ending 9/30/2024 on all 428 and 404-obligated projects.

## Environmental and Historic Preservation

### PREPA Focus Areas

- Provide support in the development of FEMA Programmatic Environmental Assessment for all dredging activities to be performed island-wide.
  - Proposed actions and alternative analysis were provided to FEMA for review. Request for information period was finalized and completed. PREPA is awaiting FEMA's determination on next course of action.
  - PREPA has engaged local agencies to determine whether partnerships are possible for the beneficial use of materials.
  - Design team is coordinating with PREPA's environmental specialists to identify the project impacts.
- Complete EHP checklist and documentation requirements for the following projects once Detailed SOW have been completed. Priority projects for the



completion of this request include:

- Toro Negro Hydroelectric System – Currently in the EHP queue
- Caonillas Hydroelectric Project – Currently in the EHP queue
- Guayabal Dam Repairs and Mitigation – Currently in the EHP queue
- BONUS Project – Currently in the EHP queue
- Rio Blanco Hydroelectric System
- South Coast Irrigation District
- Dams Minor Repairs
- Lajas Irrigation District
- Dredging:
  - Benthic Studies are completed for all 11 reservoirs.
  - Caonillas Reservoir Design
  - Dos Bocas Reservoir Design
- Geotechnical Studies and information were and will be provided for the following projects:
  - Guajataca Dam
  - South Coast Irrigation District
  - Lajas Irrigation District
  - Isabela Irrigation District
- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
  - Includes final studies to be conducted by the engineering team including:
    - Dewatering Tests
    - Borrow Area Studies
    - Outlet Works Design
    - Survey (Utility, Contractor Land Use, Property Boundaries, etc.)
    - Development of the project impact list and draft Environmental Assessments
- PREPA requested a collaborative relationship between the US Army Corps of Engineers (USACE) and FEMA for the preparation of the environmental documents to comply with the National Environmental Policy Act (NEPA).
- Implement an independent public notification program that meets FAASt and EHP requirements within PREPA website. Current actions to complete entail establishing an “inquiry information” platform.

## Engineering Management

### PREPA Focus Areas

- PREPA has continued the development of engineering design for EHP approval.
  - Updated engineering reports were received for:



- Toro Negro Hydroelectric System Connection
- South Coast Irrigation District
- Lajas Irrigation District
- Isabela Irrigation District
- Within the next 90-days, the following projects will receive updated or new engineering reports, pending mitigation approval for some projects:
  - Rio Blanco Hydroelectric System Connection
  - Caonillas Hydroelectric Plant No. 1
  - Caonillas Reservoir
  - Dos Bocas Reservoir
- Dredging Projects:
  - A/E design firms were selected for individual projects: CSA and AECOM.
  - The priority projects will start with Caonillas and Dos Bocas.
  - All projects have design activity ongoing.
- Guajataca Dam – Project requires specialized skillsets, and management has finalized the evaluation of the contract structure to receive such services from USACE. The Project Management Plan for technical studies and project design is currently under development.
  - USACE received approval for the Guajataca Dam Boring and Staging Area Plans.
  - This will be the next action.
- IT/OT Telecoms was approved by FEMA.
  - This project is awaiting FOMB approval of the contracts.
- Early Warning System (404 Mitigation Funding)
  - RFP for solicitation of a design/build contractor was issued in early October of 2023.
  - Proponents have been selected to execute design/build. Under contract negotiations.
  - This project has received FOMB approval and commenced this quarter.

## **Enterprise Project Management (“EPM”)**

### PREPA Focus Areas

- Continue managing project schedules, tasks, budgets, and progress in PREPA’s system of record, MS Project Online.
- Continue refining project management controls and artifacts aligned with federal requirements.
- Continue integration of federally funded projects into PREPA’s EPM program to allow for project management across the entire portfolio, including non-federally funded projects



- Refine MS Power BI reporting dashboards and develop standard reporting at the portfolio level
- Monitor and manage implementation progress through the EPM program.

### III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Water Asset projects *Detailed SOWs* once approved by PREB. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the second quarter of 2024, all of which are Water Asset projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

**Table 1.1 – PREPA 2024 Q4 Project Submittal Milestone**

<i>Project Information</i>						<i>Design Process</i>			
#	GM Number	Project Name	Asset	Project Formulation Status	SOW Submission Target Date	Stage	Commencement Date	100% Completion Expected Date Considers EHP Reviews	Overall Percentage of Completion
1	180723	FAASt - Rio Blanco Hydroelectric System (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Studies	Oct-24	Planning & Design	Sep-22	Oct-25	30%
2	436468	FAASt - Toro Negro Hydroelectric Conveyance Canal and Penstock Repairs	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review	Aug-24	Planning & Design	Sep-22	Jun-25	35%
3	334770	FAASt - Guajataca Dam - Permanent Repairs (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Preliminary Studies Soil Investigation Plan Submitted	Dec-28	Planning & Design	Jan-24	Dec-28	3%
4	436621	FAASt - Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending EHP and Mitigation Comments	Sep-24	Planning & Design	Jul-23	Jul-25	25%
5	721184	Guayabal Dam Seismic Retrofit	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review	Aug-24	Planning & Design	Pending FEMA approval	Jul-26	5%
6	728260	FAASt - Caonillas 1 Hydro System (Hydro)	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review and PREPA RFI Response	May-24	Planning & Design	Jul-23	Jan-25	30%
7	435769	FAASt - South Coast Irrigation District - Canals (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review	Aug-24	Planning & Design	Sep-23	Jun-25	35%
8	436467	FAASt - Isabela Irrigation District - Canals (Water Assets - Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Oct-24	Planning & Design	Apr-23	Sep-25	30%
9	436462	FAASt - Lajas Irrigation District - Canals (Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Sep-24	Planning & Design	Jun-23	Nov-25	30%
10	334811	FAASt - Dos Bocas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Jan-25	Planning & Design	Dec-22	TBD	15%
11	178722	FAASt - Caonillas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Jan-25	Planning & Design	Dec-22	TBD	15%

Project Information						Design Process			
#	GM Number	Project Name	Asset	Project Formulation Status	SOW Submission Target Date	Stage	Commencement Date	100% Completion Expected Date Considers EHP Reviews	Overall Percentage of Completion
12	334772	FAASt - Guayabal Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Feb-25	Planning & Design	Dec-22	TBD	10%
13	335206	FAASt - Matrullas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Apr-25	Planning & Design	Dec-22	TBD	10%
14	335207	FAASt - Guineo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Apr-25	Planning & Design	Dec-22	TBD	10%
15	334803	FAASt - Loco Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Aug-25	Planning & Design	Dec-22	TBD	10%
16	334813	FAASt - Guayo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Aug-25	Planning & Design	Dec-22	TBD	10%
17	334773	FAASt - Lucchetti Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Aug-25	Planning & Design	Dec-22	TBD	10%
18	334771	FAASt - Guajataca Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Apr-25	Planning & Design	Dec-22	TBD	10%
19	334798	FAASt - Guerrero Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	Jun-25	Planning & Design	Dec-22	TBD	10%
20	334769	FAASt - Garzas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Redeveloping DSOW	May-25	Planning & Design	Dec-22	TBD	10%
21	746897	BONUS	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review and PREPA RFI Response	Jun-24	Planning & Design	Aug-23	Jul-24	30%