



October 1, 2024

Via Email

Hon. Edison Avilés Deliz
Chairman
Puerto Rico Energy Bureau
Email: comentarios@jrsp.pr.gov

In Re: Public Comments on Priority Plan for the Stabilization of the Electric Grid, Case No. NEPR-MI-2024-0005.

We are writing to endorse the Electric System Stabilization Plan put forth by Genera (Genera's Plan). This plan represents a critical step forward in Puerto Rico's journey towards a resilient, reliable, and innovative energy system.

Over the past five years, Puerto Rico's electrical system has undergone an unprecedented transformation aimed at revitalizing its energy sector. The success of this comprehensive change is vital for the island's economic recovery and social stability. Genera aims to enhance and stabilize Puerto Rico's electricity system, and these efforts are crucial for supporting the quality of life for residents and fostering long-term economic growth.

The Electric System Stabilization Plan of Genera embodies a multifaceted approach designed to ensure continuous, reliable energy generation while integrating renewable sources. The plan's core strategy involves reconfiguring existing power plants into multi-purpose grid support centers, incorporating generation and energy storage equipment at strategic locations across the island. This infrastructure will not only enhance efficiency and reduce production costs but also allow for future expansion to meet the island's evolving needs.

Genera's plan includes advanced operational features that provide flexibility, responsiveness, and state of the art control systems necessary for managing and integrating a significant influx of renewable energy and storage projects. These innovations will enable swift responses to power system fluctuations, mitigate the impacts of unforeseen outages, and bolster the grid's resilience against natural and unexpected disruptions.

Furthermore, the plan promotes the adoption of distributed energy resources, supporting localized generation and consumption. This approach alleviates stress on the central grid, ensures the stability and reliability of the power supply, and addresses hazard mitigation with support and funding from FEMA. The incorporation of sustainable energy solutions fosters a more adaptable, robust, and efficient generation of energy, aligning with the vision for a sustainable energy future.

The Genera Plan outlines the critical need to add over 550MW of supplemental generation to the Puerto Rico grid on a temporary basis. It is imperative that this initiative gains the involvement of multiple sectors and stakeholders to secure the lease of the units required for generation.

Additionally, it is crucial to ensure that the federal government allocates funds for the lease, installation, operation, and maintenance of these units.

Based on our understanding of the laws of Puerto Rico, it is the Energy Bureau that holds the authority to approve Genera's entry into such a lease. Therefore, we request the Energy Bureau to act with a sense of urgency in allowing the commencement of this project. The Energy Bureau must promptly initiate a procurement process, similar to what it is doing with the ongoing tranches, to secure a lessor and operator for the required units. Alternatively, the law also delegates the Puerto Rico Public Private Partnerships to conduct this type of process, as it pertains to a delegated PREPA function, akin to the development of the new private LNG plant that the P3A is procuring.

Additionally, we invite the Energy Bureau to join the government and private sector in advocating before the US Congress to secure the necessary funds for the lease and operation of the temporary power. Time is of the essence, and as soon as the Energy Bureau orders the commencement of the lease procurement process, the sooner we can have the units installed and operational in Puerto Rico. The people of Puerto Rico trust the Energy Bureau to act promptly, as it is the only entity that holds the key to unlock this pivotal project.

Moreover, the Energy Bureau must extend the current December 2025 deadline to have the FEMA generators that are currently installed in the Island. Once this regulatory approval is granted, we can join forces and request FEMA to maintain the generators in the island for a longer period than it is currently allowed by the grant.

We appreciate the opportunity to express our support for the stabilization of Puerto Rico and look forward to having the Energy Bureau working with urgency to enable projects that will allow Puerto Rican to have the Energy System it deserves.

Thank you for your attention to this important matter.

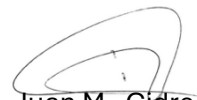
Sincerely,



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ACDET



Carlos Budet
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Juan M. Cidre
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Hecho en PR



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