

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

**NEPR**

**Received:**

**Sep 13, 2024**

**5:51 PM**

**IN RE:**

REVIEW OF GENERA PR, LLC  
REQUEST TO OPERATE PALO SECO MP  
AND MAYAGUEZ CT WITH NATURAL  
GAS AS PRIMARY FUEL

**CASE NO.:** NEPR-MI-2024-0004

**SUBJECT:** Motion to Submit Supplement to  
Response Submitted on August 30, 2024

**MOTION TO SUBMIT SUPPLEMENT  
TO RESPONSE SUBMITTED ON AUGUST 30, 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 August 15, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Supplement to the Second and First Request for Information (ROI)* ("August 15<sup>th</sup> Resolution"). In the August 15<sup>th</sup> Resolution, the Energy Bureau ordered Genera to supplement and/or clarify the responses to ROI #1: 2, 4, 7, and 10(c), and responses to ROI #2: 3(a), 3(b), 4(a), 4(c), 4(d), 4(e), 5(e), 6, 8, 9, 10(a), and 15(b).

2. On August 30, 2024, Genera submitted a document titled *Motion to Submit Response to Request for Information in Compliance with Resolution and Order dated August 15, 2024* ("August 30<sup>th</sup> Motion") in which it provided responses to inquiries posed by the Energy

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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, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (defined in the LGA OMA) the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

Bureau aimed at seeking additional elucidation regarding previously submitted responses. These inquiries and responses pertain to the ownership and future control of the assets pertinent to the Mayaguez CTs and Palo Seco MobilePac fuel swap projects. In the pursuit of furnishing an unambiguous and uncomplicated mechanism for the Energy Bureau to assess the ownership, construction, and future operation and maintenance of these assets, Genera acknowledges that the appended charts, attached herewith as Exhibit A - the Mayaguez CT Responsibility Matrix and Exhibit B - the MobilePac Responsibility Matrix Palo Seco offer a clearer understanding of these three aspects.

3. Consequently, Genera submits the aforementioned charts encompassing the delineation of each asset or component and a categorization to denote whether it pertains to PREPA, Genera, Affiliate, or the Fuel Supplier in each of the following categories: (1) Ownership, (2) Procurement, Installation and Commissioning, and (3) Operation and Maintenance. In the context of the Mayaguez CT project (Exhibit A), the description of each asset is bifurcated into sections labeled "Inside PREPA Fence" and "Inside Regasification Site." The latter refers to a leased parcel of land adjacent to the PREPA site, where all the regasification equipment will be situated. Conversely, the Palo Seco MobilePac project does not have such delineations, as the entire project is situated within the Palo Seco lot and does not need further expansion. The regasification equipment intended for use is the same equipment previously installed and commissioned to support the FEMA/USACE Puerto Rico Power System Stabilization Task Force.

4. Genera understands that these matrixes furnish comprehensive information as per the request of the Energy Bureau in a simplified, straightforward manner. Nevertheless, should the Energy Bureau ascertain the need for further details, Genera respectfully requests the scheduling

of a meeting with the technical advisors from the Energy Bureau to engage in further discussion and subsequent clarification for the public record.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all relevant purposes and **accept** Genera's supplement to the August 30<sup>th</sup> Response, submitted herewith as Exhibit A and Exhibit B to this Motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 13<sup>th</sup> day of September 2024.

**ECIJA SBGB**  
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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 13<sup>th</sup> day of September 2024.

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez

Exhibit A

## MAYAGUEZ CT RESPONSIBILITY MATRIX

[illegible]

Exhibit B

## MobilPac RESPONSIBILITY MATRIX - Palo Seco

[illegible]