

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

**NEPR**

**Received:**

**Nov 8, 2024**

**5:48 PM**

**IN RE:**

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

**CASE NO.:** NEPR-MI-2021-0002

**SUBJECT:** Motion to Submit Monthly BESS  
Progress Report in Compliance with Resolutions  
and Orders Dated February 1, 2024, and April  
23, 2024

**MOTION TO SUBMIT MONTHLY BESS PROGRESS REPORT IN  
COMPLIANCE WITH RESOLUTIONS AND ORDERS  
DATED FEBRUARY 1, 2024, AND APRIL 23, 2024**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsels of record, and respectfully submits and prays as follows:

1. On February 1, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order titled *Determination on GENERA's November 21 Motion Submitting Response in Compliance with the Resolution and Order Dated November 8, 2023, and Requesting a Time Extension to Provide the Detailed Scope of Work per Site* (“February 1<sup>st</sup> Order”). In the February 1<sup>st</sup> Order, the Energy Bureau approved the projects included in Attachment A therein and noted that Genera is required to present these approved projects to the Federal Emergency Management Agency (“FEMA”) and the Puerto Rico

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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 (as defined in the LGA OMA) provided by Genera under the LGA OMA.

Central Office for Recovery, Reconstruction and Resiliency (“COR3”) to finalize their approval process.

2. Additionally, in the February 1<sup>st</sup> Order, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA<sup>2</sup>, as well as updates on the development status of the detailed Scope of Works (“SOW”) and the Battery Energy Storage System (“BESS”) Request for Proposals (“RFP”) (“Monthly Progress Report for the BESS Project”).

3. On April 23, 2024, the Energy Bureau issued a Resolution and Order titled *Resolution and Order on Motion to Submit Scope of Work in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on March 28, 2024 and Memorandum of Law in Support of Confidential Treatment of Scope of Work Submitted on March 28, 2024, in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on April 8, 2024* (“April 23<sup>rd</sup> Resolution”). In the April 23<sup>rd</sup> Resolution, pertinent to this motion, the Energy Bureau reiterated to Genera the February 8<sup>th</sup> Order regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the Monthly Progress Report for the BESS Project any updated information concerning the locations and MW quantities comprising the total of 430 MW of BESS projects across the full set of nine (9) project locations originally included in the October 27<sup>th</sup> Motion<sup>3</sup> and referenced in Figure 1 of Exhibit A to the March 28<sup>th</sup> Motion<sup>4</sup>.

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<sup>2</sup> LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

<sup>3</sup> See, *In re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan – December 2020*, Case No. NEPR-MI-2021-0002, *Amended Motion for Leave to Submit Amendment to Project and 406 BESSs Initial Scope of Work*, filed by Genera on October 27, 2023 (“October 27<sup>th</sup> Motion”).

<sup>4</sup> See, *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 Scope of Work in Compliance with Resolution and Order dated November 8, 2023*, filed by Genera on March 28, 2024 (“March 28<sup>th</sup> Motion”).

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

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

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 8<sup>th</sup> day of November 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 and that we will send an electronic copy of this motion to the PREPA's counsel, Mirelis Valle Cancel, at [mvalle@gmlex.net](mailto:mvalle@gmlex.net), and Alexis Rivera, at [arivera@gmlex.net](mailto:arivera@gmlex.net); and to LUMA's counsel, Margarita Mercado, at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), and Yahaira De La Rosa, at [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com).

In San Juan, Puerto Rico, this 8<sup>th</sup> day of November 2024.

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez

Exhibit A.  
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

IN RE: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan – December 2020

Re: Monthly BESS Report – October 2024

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### **Unit Retirement**

To advance the Battery Energy Storage System (BESS) and Peaker Project, Genera must undertake the decommissioning of several units within its portfolio. This includes both units currently in operation and those that have been non-operational for an extended period. The following narrative outlines Genera's understanding of the procedural framework for obtaining approval for decommissioning services, along with the current status of the decommissioning request processes.

#### ***A. Genera's contractual responsibilities under Legacy Generation Assets – Operation and Maintenance Agreement***

According to the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement (LGA OMA)<sup>1</sup> dated January 24, 2023, between the Puerto Rico Electric Power Authority, the Puerto Rico Public-Private Partnerships Authority, and Genera, the responsibility for decommissioning the legacy generation assets falls to Genera. Puerto Rico's goal is to meet energy demand with cleaner energy. To achieve this goal, the existing generation assets must be gradually decommissioned, allowing the land to be utilized for the installation of new generation units. The following sections of the LGA OMA specifically outline Genera's responsibilities regarding the decommissioning of the units.

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<sup>1</sup> Capitalized terms not defined in this document shall be ascribed the meaning provided in the LGA OMA.

As defined in Section 1, of the LGA OMA, “Decommissioning Services” means services provided under the LGA OMA in order to complete the dismantlement and removal of the structures comprising the Legacy Generation Assets, and all other activities indispensable for the retirement, dismantlement, Decontamination or storage of the Legacy Generation Assets, including the services contemplated by the Decommissioning Plan, in each case in compliance with Applicable Law and in accordance with the Integrated Resource Plan; provided that the Decommissioning Services shall not include O&M Services or Demobilization Services.

The LGA OMA has specific provisions on how the Decommissioning Services are rendered. Below the most relevant to this report.

#### Article 16. DECOMMISSIONING –

##### Section 16.1 Notice and Approval for Retirement of Legacy Generation Assets and Commencement of Decommissioning Services.

(a) Generally. After the Service Commencement Date (i) Administrator (acting on behalf of Owner and taking into account 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 or (ii) in the event that Operator determines in accordance with Prudent Industry Practice and taking into account the Integrated Resource Plan, and in consultation with PREB and T&D Operator that, due to an Emergency Event, Extended Event or other critical developments at the applicable Legacy Generation Asset, all or a portion of the Legacy Generation Asset cannot continue to be safely operated and maintained, Operator may deliver to Administrator and PREB (with copy to Owner and T&D Operator) a request to commence Decommissioning Services for the applicable Legacy Generation Asset, which request Administrator and PREB shall approve or deny within thirty

(30) days of receipt. The date on which Operator receives the notice referenced in clause (i) above or the date on which Operator receives the approval from Administrator and PREB referenced in clause (ii) above shall be the "Decommissioning Notification Date" for the respective Legacy Generation Asset. Operator shall not commence any Decommissioning Services under clause (ii) above until it has provided T&D Operator at least two (2) years advance written notice of the commencement of such Decommissioning Services, **unless mandated by PREB to commence such Decommissioning Services on a specific earlier date.**

(b) Decommissioning Plan. No later than one hundred twenty (120) days after the Decommissioning Notification Date for a Legacy Generation Asset, Operator shall prepare and submit to Administrator and PREB (with copy to Owner and T&D Operator), for their review and approval, a decommissioning plan for such Legacy Generation Asset (the "Decommissioning Plan") consistent with the Decommissioning Plan outline set forth in Annex XV (Decommissioning Plan). The Decommissioning Plan shall provide for (i) the permitting, demolition, Decontamination, waste disposal and dismantling/or preparation for conversion to such other future use as Administrator and PREB may designate, as applicable, of the Legacy Generation Asset, and waste disposal, for achievement of end -state conditions within a prescribed time (provided that Operator does not have any obligation to perform Decommissioning Services after the expiration of the Term unless the Agreement is extended by Owner and Administrator to allow Operator to complete such services), (ii) the development of the Decommissioning Budget, as set forth in Section 16.2 (Decommissioning Compensation) below, (iii) reasonably acceptable arrangements to facilitate the transition of Operator Employees, who meet certain qualifications at such Legacy Generation Asset and whose positions will be eliminated



after the completion of the Decommissioning Services, into new jobs or industries, including a training and/or severance plan (to be funded by Owner) for any Operator Employees not hired into a successor job or industry, which arrangements Operator, Owner and Administrator shall cooperate as needed to implement, and (iv) a timeline setting forth when Decommissioning Services shall be provided, including the date on which the Decommissioning Services shall commence (the "Decommissioning Commencement Date") and the date on which the Decommissioning Services for such Legacy Generation Asset shall be completed (the "Decommissioning Completion Date").

(Emphasis added)

#### ***B. T&D Operator's Role in Decommissioning of Legacy Generation Assets***

The Decommissioning Services must be undertaken in accordance with the System Operation Principles, thus in close collaboration with the T&D Operator.

The Transmission and Distribution Operation and Management Agreement (the "T&D O&M Agreement") was entered into on June 22, 2020, among PREPA, Administrator and the T&D Operator. This agreement plays a crucial role in the Decommissioning Services for the Legacy Generation Assets. Mainly, the requirement for the T&D Operator to have System Operating Principles approved by PREB in place.

Whether the facility for retirement is interconnected, then the Interconnected Facility Retirement Procedure, part Operating Principles, submitted to PREB on December 9, 2021, must be followed. The Interconnected Facility Retirement Procedure defines the preparatory steps necessary to retire existing Interconnected Facilities including proper scheduling, and notifications in accordance with prudent utility practices and the Integrated Resource Plan. The procedure establishes that an Interconnected Facility Owner, or designated agent, who wishes to retire a unit from T&D Operator's operations

must initiate a retirement request in writing no less than 2-years in advance of the planned retirement date. Pursuant to section 3.3.4 of the procedure, T&D Operator shall inform the Interconnected Facility Owner, or designated agent, the full details of the transmission upgrades that shall be required of the Interconnected Facility as a pre-requisite to allow the unit to retire. Such communication shall be provided within 90 days of original retirement request.

### **C. Units Retirement Checklist and Timelines**

On August 23, 2024, Genera formally submitted a request to the T&D Operator to initiate the retirement process for both Operational and Non-Operational Gas Turbine Generators situated at various locations. This request was made in accordance with Article 16 of the LGA OMA, and an accompanying Unit Retirement Evaluation Checklist was provided as Annex A.

During a conference call on October 10, 2024, between representatives of Genera and the T&D Operator, there was a consensus on the necessity for Genera to present an updated timeline for the Unit Retirement Checklist. In compliance with this agreement, the revised document was submitted to the T&D Operator on October 11, 2024, along with inquiries regarding the procedures that the T&D Operator would employ to formally declare units as retired and taken offline.

Subsequent to this submission, an additional update was sent to the T&D Operator, addressing an oversight in which several units were inadvertently excluded from the initial evaluation list. On October 23, 2024, Genera emailed an updated timeline that included these previously omitted units, ensuring a comprehensive approach to the retirement process.

The following list delineates the generation units earmarked for decommissioning, alongside the timelines established for their retirement.

Unit Retirement Checklist Timeline				
Project	Milestone	Quarter	MW Per Project	Total MW
Units to be Retired (MW)	Daguao – GTG #1	Q2 2025	-20	-148
	Daguao – GTG #2	Q2 2025	-20	
	Palo Seco – GTG #1-1	Q2 2025	-18	
	Palo Seco – GTG #1-2	Q2 2025	-18	
	Palo Seco – GTG#2-1	Q2 2025	-18	
	Palo Seco – GTG #2-2 (Non-Operational)	Q2 2025	0	
	Palo Seco – GTG #3-1 (Non-Operational)	Q2 2025	0	
	Palo Seco – GTG#3-2 (Non-Operational)	Q2 2025	0	
	Jobos - GTG#2	Q2 2025	-20	
	Jobos - GTG#1 (Non-Operational)	Q2 2025	0	
	Yabucoa - GTG #2	Q2 2025	-16	
	Yabucoa - GTG #1 (Non-Operational)	Q2 2025	0	
	Aguirre GTG #1 (Non-operational)	Q2 2025	0	
	Aguirre GTG #2 (Non-operational)	Q2 2025	0	
	Costa Sur - GTG #1 (Non-Operational)	Q2 2025	0	
	Costa Sur - GTG #2 (Not-reliable)	Q2 2025	-18	

The objective of this retirement request and accompanying sequence is to align with the current operational targets established by Genera. This initiative is vital for advancing the development of our projects within a footprint that is already in use, which currently houses inefficient units that the PREB has mandated for retirement. A primary aim of this effort is to optimize our brownfield Generation Sites, ensuring that we enhance efficiency and sustainability while contributing to the overall goals of our energy generation strategy, as approved by PREB. By focusing on retiring outdated infrastructure, we can facilitate the integration of more modern, efficient technologies and bolster our commitment to a cleaner energy future.

The following chart shows the correlation between the retirements requested and the equipment to be installed.

Unit	Project and Capacity	COD
Palo Seco 1-1	BESS 101MW	Q4 2026
Palo Seco 1-2		
Palo Seco 2-1		
Yabucoa 1-2	Peakers 36MW	Q4 2027
Daguao 1-1	Peakers 36MW	Q4 2027
Daguao 1-2		
Jobos 1-2	Peakers 36MW	Q4 2027

On November 4, 2024, the T&D Operator formally responded to Genera's retirement request (Annex A). In their communication, the T&D Operator articulated significant concerns regarding the potential decommissioning of these units. They indicated that retiring these generation assets without having replacement capacity operational could jeopardize the T&D Operator's capability to meet peak demand and uphold system resilience. This is particularly critical during periods of elevated load or unforeseen thermal generation outages, which could strain the integrity and reliability of the overall energy system.

Genera is actively developing an alternative decommissioning sequence that is designed to ensure the projected commercial operation dates for each project remain unaffected. Upon completion of this initiative, the revised plan will be submitted to the T&D Operator for thorough evaluation and assessment. This proactive approach underscores our commitment to optimizing operational efficiency while maintaining regulatory compliance within the energy generation sector.

### **Cambalache RFP Project Milestone Important Dates**

- October 14, 2024, Published BESS Installation RFP for Cambalache Project.
- October 16, 2024, BESS RFP Presentation Kick Off Meeting
- Oct 30, 2024, Principles Presentation (Civil, Architectural, Mechanic, Electrical)
- November 21, 2024, expected RFP Proposal Submission

### **Vega Baja**

- Notice of Intent to Award for the Demolition RFP was published favoring Homeca Recycling Center Co. Inc October 18, 2024
- Contract for Demolition was sent to P3A for approval October 28, 2024 (Waiting for Approval).
- Genera received Resolution and Order respond for Decommissioning Plan from PREB on October 31, 2024, approving subject to submit updated

version addressing conditions set forth in the resolution. Genera is working to resubmit the Plan by early November 2024. The approval of the Plan is required to start demolition activities at the site in preparation for the construction work needed to Install BESS Equipment.

### **Palo Seco**

- Request for Issuance of Decommissioning Notice was sent to P3A for approval October 18, 2024. (Annex B)

### **Interconnection**

- Genera submitted application for Vega Baja, Cambalache, Costa Sur, Yabucoa, and received scope of work with cost by T&D OPERATOR on October 29, 2024.
- Genera & T&D Operator did a site visit to Cambalache and Vega Baja November 1, 2024, to go over the scope of work for interconnection also will do site visits to Costa Sur and Aguirre November 7, 2024.

### **Permits**

- Waiting DNER for Final Approval of Rule 141

Project	Site	Status
BESS	Costa Sur	Submitted on Aug 20,2024
BESS	Palo Seco	Submitted on Sep 6, 2024
BESS	Cambalache	Submitted on Aug 16, 2024
BESS	Aguirre	Submitted on Aug 28,2024
BESS	Yabucoa	Submitted on Aug 30, 2024

- Vega Baja BESS Rule 141 was approved by DNER on November 6, 2024.

- Rule 13 Vega Baja will be submitted November 2024 to Planning Board. The Elevation Certificate is used to document floodplain management compliance for Post-Flood Insurance Rate Map.

***Procurement***

- Notice of Intend to Award for the RFP to procure the BESS Equipment was published favoring Tesla PR LLC., on October 3, 2024
- Genera is finalizing Tesla Contract Negotiation to be submitted to P3A and FOMB in November 2024 for approval. Once approved first initial payment will be submitted.

***Other***

- Next RFP for Vega Baja, Costa Sur, Aguirre and Yabucoa scheduled for issuance on January 15, 2025

Annex A to Exhibit A





### Unit Retirement Checklist Timeline

**Privileged and Confidential**

					Y2024				Y2025				Y2026				Y2027			
Project	Milestone	Quarter	MW Per Project	Total MW	Q1 2024	Q2 2024	Q3 2024	Q4 2024	Q1 2025	Q2 2025	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Q3 2026	Q4 2026	Q1 2027	Q2 2027	Q3 2027	Q4 2027

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Annex B to Exhibit A



October 18, 2024

**Via Electronic Email:**

Puerto Rico Public-Private Partnerships Authority  
PO BOX 42001  
San Juan, Puerto Rico 00940-2001  
Attention: Executive Director – Fermín E. Fontanés Gómez  
Telephone: (787) 722-2525 Ext. 15330  
Email: Fermin.Fontanes@p3.pr.gov and Administrator@p3.pr.gov

**Re: Request for Issuance of Decommissioning Notice for the Palo Seco GTG Units**

Dear Administrator,

We refer to the Puerto Rico Thermal Generation Facilities Operations and Maintenance Agreement (“OMA”) dated January 24, 2023, between the Puerto Rico Electric Power Authority, the Puerto Rico Public-Private Partnership Authority (the “Administrator”), and Genera PR LLC (“Genera”). Capitalized terms not defined in this letter shall have the meanings ascribed to them in the OMA. As you are aware, Genera is actively working to install additional peaking generation and storage capacity at several sites. These projects involve various activities, including site preparation to install the equipment. Specifically, Genera plans to install a 101MW battery energy storage system in Palo Seco (“Palo Seco BESS”). This, along with other ongoing projects, highlights Genera's commitment to maximizing the utilization of federal funds for the reconstruction and strengthening of Puerto Rico's electrical system.

To facilitate the installation of Palo Seco BESS and in accordance with our mandate to decommission units as ordered in the OMA and the Operative IRP,<sup>1</sup> Genera must decommission and demolish six Frame 5 gas turbine generators (“GTG PS Units”) installed at the Palo Seco site. These units are listed below.

Unit	Operational Status	Capacity Factor (October 2023-September 2024)	Forced Outage Factor (October 2023-September 2024)
GTG #1-1	In service	23.6%	16.3%
GTG #1-2	In service	15.1%	40%
GTG #2-1	In service	25.6%	17.4%
GTG #2-2	Not in service since 1/1/2020	0	100
GTG #3-1	Not in service since 1/1/2020	0	100
GTG # 3-2	Not in service 3/1/2017	0	100

<sup>1</sup> *Final Resolution and Order on the Puerto Rico Electric Power Authority Integrated Resource Plan* (August 24, 2020), as amended by the *Final Resolution on Reconsiderations* (December 2, 2020); entered in case no. CEPR-AP-2018-0001, *In Re: Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*.



October 18, 2024

The decommissioning of GTG PS Units is crucial to completing the site preparation necessary for the installation of the Palo Seco BESS. Therefore, in accordance with Article 16.1 of the OMA and the Energy Bureau's orders in case no. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan – December 2020*,<sup>2</sup> Genera hereby requests that the Administrator promptly issue a decommissioning notice to commence Decommissioning Services for the GTG PS Units.

To meet the current target for commissioning the Palo Seco BESS, all GTG units (GTG 1-1, GTG 1-2, and GTG 2-1) must be disconnected from the system by no later than March 2025. This is essential to begin the decommissioning and demolition process, freeing up the footprint for the installation of the Palo Seco BESS. Genera provided notice of the disconnection schedule to LUMA on August 23, 2024. We are continuously engaging with them, holding weekly meetings to discuss and refine the processes to be followed.

The prompt and expedited issuance of the decommissioning notice is crucial to maintain the target commercial operation date of the Palo Seco BESS by the end of 2026.

We are available to discuss or clarify any questions that Administrator may have regarding this topic. Should the need arise, please contact Mr. Kevin D. Futch, General Counsel, at [kevin.futch@genera-pr.com](mailto:kevin.futch@genera-pr.com).

*[Signature Page to Follow]*

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<sup>2</sup>i.e., in the *Resolution and Order* entered on July 17, 2024, with the subject *Genera Motion Requesting Acceptance of Amended Scope of Work for Battery Energy Storage System Project*, PREB emphasized that BESS projects being developed by Genera are “**critical resources for Puerto Rico and will directly support the ongoing repair and restoration of reliable electrical service to Puerto Rico customers.** Furthermore, given the continuing service interruptions to customers noted by Genera in the June 20 Motion, the Energy Bureau **reiterates and stresses the URGENCY** to completing all the necessary steps contained in Exhibit A to finish the planning, preparation, procurement, demolition, permitting and other requirements to install these resources in an accelerated manner. **The Energy Bureau ORDERS Genera to EXPEDITE the completion of all steps for this BESS Project.**” (emphasis in the original)

Cordially,

**Genera PR LLC**

*Kevin Futch*

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Kevin D. Futch  
General Counsel

With copy to:

Puerto Rico Electric Power Authority  
PO Box 364267  
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Attention: Executive Director – Josué Colón  
Email: director\_ejecutivo@prepa.com; ceo@prepa.com; josue.colon@prepa.com

Energy Bureau, Public Service Regulatory Board  
268 Avenue Muñoz Rivera  
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7th Floor, Suite 704  
San Juan, Puerto Rico 00918  
Attention: Chairman and President – Mr. Edison Avilés Deliz

LUMA Energy Servco LLC  
1500 Ave. Franklin Delano Roosevelt Guaynabo, PR 00969  
Attn: Chief Executive Officer – Juan Saca