1GOVERNMENT OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

IN RE: REQUEST FOR APPROVAL OF THE VEGA BAJA DECOMMISSIONING PLAN	**CASE NO.:** NEPR-MI-2024-0003 **SUBJECT:** Request for Reconsideration of October 31, 2024, Determinations and Motion to Submit Response in Compliance with the Resolution and Order dated November 13, 2024

REQUEST FOR RECONSIDERATION OF OCTOBER 31, 2024, DETERMINATIONS AND MOTION TO SUBMIT RESPONSE IN COMPLIANCE WITH THE RESOLUTION AND ORDER DATED NOVEMBER 13, 2024

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera"), as agent of the Puerto Rico Electric Power Authority ("PREPA"),[1] through its counsels of record, and respectfully submits and prays as follows:

1. On October 31, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Approval of the Vega Baja Decommissioning Plan* ("October 31st Resolution"). In the October 31st Resolution, the Energy Bureau determined that the decommissioning of the Vega Baja Power Station submitted by Genera aligns with the Approved Integrated Resource Plan ("Approved IRP")[2] and the strategic initiatives for transitioning Puerto Rico's energy infrastructure towards renewable sources. While

[1] 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 ("P3A"), 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] Final Resolution and Order on the Puerto Rico Electric Power Authority's Integrated Resource Plan, *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001, August 24, 2020 ("Approved IRP"). Minor modifications and/or clarifications to the Approved IRP were introduced through a Resolution and Order on Reconsiderations issued by the Energy Bureau on December 2, 2020, in case*: In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001.

acknowledging the Proposed Decommissioning Plan's general compliance with regulatory requirements, the Energy Bureau noted the need for adjustments in several substantive elements, such as the decommissioning budget, project timeline, and the consultation processes involved in the decommissioning notice. Furthermore, the October 31st Resolution ordered Genera to modify the Proposed Decommissioning Plan, including the Decommissioning Budget discussion in the Executive Summary and any other relevant sections concerning the cost savings incentive. The Energy Bureau specified that Genera would not be eligible to receive any incentive payments from other sources, as the proposed decommissioning would be fully federally funded.

2. On November 12, 2024, Genera filed a document titled *Motion to Submit Amendment to the Decommissioning Plan for the Vega Baja Power Station* ("November 12th Motion"). Through the November 12th Motion, Genera submitted a revised version of the Proposed Decommission Plan as Exhibit A ("Updated Decommissioning Plan") along with a table outlining the changes and addressing the comments, recommendations or orders stated by the Energy Bureau in the October 31st Resolution.

3. On November 13, 2024, the Energy Bureau issued a Resolution and Order titled *Approval of the Vega Baja Decommissioning Plan* ("November 13th Resolution"). In the November 13th Resolution, the Energy Bureau expressed that, from a preliminary review of the Updated Decommissioning Plan, the cost savings incentive section had not been modified. Consequently, the Energy Bureau requested that Genera discuss in its filing of the Decommissioning Plan any unmodified provisions, accompanied by a detailed justification for reconsideration of the original determinations regarding such conditions. The Energy Bureau emphasized that: "**We remind**

Genera that it is not within its purview to unilaterally reject the Energy Bureau's mandates or defer them for future resolution"[3].

4. Lastly, in the November 13th Resolution, the Energy Bureau additionally noted that Genera must ensure that the Updated Decommissioning Plan presented includes all modifications required in the October 31st Resolution. The Energy Bureau further mandated Genera to submit, within three (3) business days of the notification of the November 13th Resolution, a redlined version reflecting the changes made to the Proposed Decommissioning Plan along with a detailed justification for any reconsiderations of its initial determinations as outlined in the October 31st Resolution.

5. In response to the Energy Bureau's assertion in the November 13th Resolution that "**We remind Genera it is not within its purview to unilaterally reject the Energy Bureau's mandates or defer them for future resolution**," Genera wishes to clarify and emphasize that it has not unilaterally rejected the mandates issued by the Energy Bureau. As explicitly stated in Exhibit B of Genera's November 12th Motion, Genera respectfully requested that the Energy Bureau defer the matter concerning incentive interpretation for further discussion and decision. This request was made to ensure continuous progress on the decommissioning activities and to avoid further delays. Genera believes that the determination regarding incentives can be addressed separately from the execution of the decommissioning plan, and by requesting the Energy Bureau to evaluate the possibility of deferring this matter, Genera aimed to facilitate more expedient progress in decommissioning the Vega Baja facility, thereby aligning with the shared goal of advancing Puerto Rico's energy transition.

[3] *See* November 13th Resolution, p. 1.

6. Therefore, it is inaccurate to characterize Genera's actions as a unilateral rejection of the Energy Bureau's mandates. Genera's communication reflects respect for the regulatory authority of the Energy Bureau and a commitment to collaborative compliance with established procedures. Genera respectfully requests that this interpretation be reconsidered, and that Genera's efforts to cooperate and meet the regulatory and operational objectives be recognized.

7. Moreover, in the October 31st Resolution, the Energy Bureau set out new and additional requirements for Genera to benefit from the incentives related to Decommissioning Costs, diverging from those outlined in the LGA OMA. In accordance with the directives of the November 13th Resolution, Genera respectfully objects to this deviation, which negatively impacts its legal rights. Nevertheless, Genera reiterates its request that the resolution of this matter not delay the progress of the underlying project. The underlying project offers significant benefits to the people of Puerto Rico, and Genera should not be asked to waive any rights (i.e., those related to incentives) before they have even been invoked (i.e., no savings have been claimed at this point) in order for the project to proceed.

8. In this regard, the Energy Bureau determined in the October 31st Resolution that:

> "***Genera may only receive a cost savings incentive if FEMA*** *funds* ***are available and permissible under federal guidelines."***[4] **"**Genera will not be eligible to receive any incentive payments from other sources. In other words, if FEMA funds do not cover the cost savings incentive, **no alternative funding -whether from PREPA or other non-federal sources- can be used to pay the incentive."**[5] **"Given this significant compensation already guaranteed to Genera, it further supports the conclusion that any additional incentive payments, especially those coming from Genera's FY 2026 Operating Budget or any other PREPA's funds, are not justified. Paying an incentive for unrealized or speculative cost reductions would impose an unnecessary financial burden on PREPA and the ratepayers, particularly when Genera will continue receiving substantial payments for assets that are no longer in service."**[6]

[4] *See* October 31st Resolution, p. 10.
[5] *Id*.
[6] *See* October 31st Resolution, p. 11.

9. The Energy Bureau did not cite any provision in the LGA OMA to support the requirement for federal fund availability for incentives to be earned. Genera respectfully submits that the determination of not allowing Genera to receive Incentive Payment for Decommissioning Cost Efficiencies unless certain new conditions are met deviates from the agreement established by the Parties in the LGA OMA and, thus, must be reconsidered.

10. Section 16.2 of the LGA OMA outlines the Decommissioning Compensation process. Section 16.2 of the LGA OMA provides that as part of the Operator's Decommissioning Plan, the Operator must create a Decommissioning Budget detailing the Pass-Through Expenditures required for the Decommissioning Services of the applicable Legacy Generation Asset. This includes monthly budgets and cash flows for each Contract Year during which the services are expected. The Decommissioning Budget, which must comply with PREB guidelines and not exceed the costs of O&M Services, must be submitted to the Administrator and PREB as part of the Decommissioning Plan. The Decommissioning Budget must also propose the basis and methodology for cost savings, **including Incentives and Penalties** for Decommissioning Costs Efficiency. The Administrator will review the Decommissioning Budget within thirty (30) days, requesting any necessary changes to ensure compliance. The Operator must then submit a revised Decommissioning Budget within ten (10) days if requested changes are made. Genera has completed this review process.

11. On the other hand, Section 7.6(c) of the LGA OMA details the management and utilization of the Decommissioning Account. It requires the Owner to establish one or more operating accounts no later than ten (10) Business Days before the Service Commencement Date, from which the Operator can draw funds to cover Pass-Through Expenditures incurred during Decommissioning Services. These accounts, collectively known as the "Decommissioning

Account," must be funded ten (10) Business Days before the Decommissioning Commencement Date with the anticipated expenses for the next month, based on the approved Decommissioning Budget. *See* Section 7.6(c)(ii) of the LGA OMA. Thereafter, the account will be replenished monthly following the procedures in the PREPA-Genco-Hydroco Operating Agreement. *Id*.

12. During the Decommissioning Services, the Operator can withdraw funds from the Decommissioning Account for expenditures included in the approved budget. *See* Section 7.6(c)(iii) of the LGA OMA. Withdrawals for unbudgeted expenses require approval unless due to a Force Majeure Event, Owner Fault, Forced Outage, or unforeseen circumstances necessitating immediate funding. *Id*. In such cases, the Operator must promptly notify the Administrator in writing, detailing the event and the intended withdrawal amount. *Id*.

13. The Energy Bureau did not cite any provision in the LGA OMA to support the requirement for federal fund availability for incentives to be earned. Genera respectfully submits that the determination to withhold Incentive Payments for Decommissioning Cost Efficiencies unless certain new conditions are met deviates from the agreement established by the Parties in the LGA OMA and, thus, must be reconsidered.

14. The LGA OMA sets forth that Genera will be evaluated on its performance in Decommissioning Services for a Legacy Generation Asset based on the Decommissioning Costs Efficiency category, as detailed in Section III.C of Annex II of the LGA OMA. This evaluation aims to encourage Genera to meet specific targets. Upon completion of the Decommissioning Services, if the actual expenditures match or exceed the budget and the services are completed by the Decommissioning Completion Date, no Incentive Payment is applicable. If expenditures are below the budget and the services are completed on time, Genera may receive an Incentive Payment based on the cost savings, subject to a cap. Actual savings are calculated as the

Decommissioning Budget minus actual expenditures. The aggregate Incentive Payment is subject to the Annual Incentive Cap. If the services are not completed by the specified date, Genera faces a Penalty of $1,000,000 per week of delay, up to a maximum of $15,000,000 across all assets and sites. The LGA OMA imposes no restrictions on the source of funds for incentive payments.

15. Instead, the order essentially argues that, since (i) Genera, PREPA and P3 negotiated for and agreed to no reductions in the O&M Fixed Fee before year six of the LGA OMA, regardless of whether units were decommissioned earlier than anticipated, and (ii) PREB perceives that as an excessive financial benefit, then (iii) PREB may proclaim new and additional provisions in the contract for incentives to apply. Per PREB's analysis, Genera will continue receiving O&M Fixed Fee for these units even if the units are decommissioned before the end of the contract term, which entitles Genera to "approximately $900,000,000" in compensation after decommissioning begins. They suggest that this guaranteed compensation supports the conclusion that any additional incentive payments, particularly from Genera's FY 2026 Operating Budget or other PREPA funds, are unjustified. Genera disagrees.

16. The fixed compensation and incentive structure in the LGA OMA represents a core element of the bargain among the parties. It is not correct, as a basic premise, to use general qualitative assessments of whether a compensation structure is "significant" or "substantial" to deny explicit contractual rights. This would pose a significant threat to the rule of law and trust in contractual rights in Puerto Rico, at least insofar as any such contracts may come under the purview of the Energy Bureau.

17. Even so, the qualitatively assessment of compensation that appears to have been carried out does not account for the significant and substantial work that Genera is doing without corresponding fixed fee benefit at the moment. Genera is, in fact, operating a greater number of

generation assets and capacity than what is specified in the LGA OMA, after having taken over the operation of the temporary generation assets without an increase to the fixed fee compensation. Additionally, while it is true that Genera will decommission certain units and continue receiving contractually binding fee obligations, it is also true that the total amount of generation being decommissioned **is less** than the nameplate capacity of the new generation that Genera will install and manage throughout the contract's duration.[7] Following the line of thinking set out in the order, the parties to the LGA OMA should agree to amend the Service Fee in the future to account for Battery Energy Storage System ("BESS"), Peaker, and other assets that come into the portfolio.

18. To provide a specific example, since March 15, 2024, Genera has administered fourteen (14) additional units with a combined nameplate capacity of 340 MW. These units are not listed in the Legacy Generation Assets in Annex I of the LGA OMA, and Genera **has not** received an additional Service Fee for their management.

19. To reiterate, it is crucial to reaffirm that the contractual framework outlined in the LGA OMA explicitly establishes the incentives structure, which is not only a key component of Genera's agreement but also a binding obligation that parties must honor. This structure is designed to ensure that Genera is fairly compensated for its role in effectively meeting the Decommissioning Cost Provisions while also having consequences if failing to meet certain targets. Logically, if no incentives apply, then no penalties should apply. In any case, the LGA OMA does not distinguish between the Decommissioning Budget being federally funded or not when it comes to qualifying for incentive payments. Thus, PREB cannot make such a distinction at this juncture.

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[7] The net additional nameplate capacity of approximately 800 MW managed by Genera reflects an important strategic enhancement, occurring after deducting the capacity that is set to be retired in the coming years. This retirement of existing nameplate capacity is essential to facilitate the integration of new projects within the energy framework. In detail, this total includes 340 MW from the former FEMA facility (now typically referred to as the TM2500 units), around 244 MW from peaker units, and 430 MW from BESS. Currently, Genera is not receiving an increase in the Service Fee for this additional generation beyond what has been assigned for Genera to operate and maintain in the LGA OMA.

20. The October 31st Resolution from the Energy Bureau unfortunately deviates from these stipulations by imposing arbitrary, unilateral limitations on Genera's ability to receive incentive payments. Any determination that undermines the contractual incentive structure contravenes the foundation of Genera's agreement and disregards the intentions of the parties involved. It also forces open a lengthy discussion on contractual rights that Genera does not view as timely. Genera's preference is to focus on advancing projects that will improve the reliability of the grid system. But Genera will not waive its rights.

21. **In conclusion**, it is respectfully submitted to the Energy Bureau the following proposals regarding the decommissioning of the Vega Baja units and the Updated Decommissioning Plan:

a. Genera urges the Energy Bureau to recognize the critical necessity for the expeditious commencement of decommissioning activities for the Vega Baja units. This action is essential to facilitate the timely initiation of commercial operations for the BESS project slated for installation at the same location. Accordingly, Genera requests the approval of the deferment for future assessment of the applicability of Incentive Payments in relation to the Vega Baja Decommissioning Services, alongside the approval of the Updated Decommissioning Plan submitted on November 12, 2024. This approval should be with the understanding that further modifications may be required contingent upon the Energy Bureau's final determination regarding the Incentive Payment applicability.

b. Genera further respectfully requests that the Energy Bureau reconsider the conclusions reached in the October 31st Resolution, which denied Genera the authority to receive Incentive Payment sourced from non-federal funding, including

the GenCo budget, for the purposes of this project. Genera asserts that, following this determination, it should be found that the Updated Decommissioning Plan presented on November 12, 2024, is compliant and does not require additional amendments for the Energy Bureau's evaluation in relation to the orders of the October 31st Resolution.

22. Lastly, in compliance with the November 13th Resolution, Genera hereby submits as Exhibit A to this Motion, a redlined version reflecting the changes made to the Proposed Decommissioning Plan.

WHEREFORE, Genera respectfully requests the Energy Bureau to **take notice** of the above for all purposes; **reconsider** the October 31st Resolution determinations regarding the cost savings incentive section of the Proposed Decommissioning Plan; and **deem** Genera to be in compliance with the November 13th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of November 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 18th day of November 2024.

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez

Exhibit A

Vega Baja Proposed Decommissioning Plan

GT Unit 1 | GT Unit 2 | Balance of Plant

SL-018338

November 18, 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.

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Figures and Tables

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.

EXECUTION TIMELINE

A well-rounded plan for managing each phase of the Vega Baja Decommissioning Project is included in Appendix D – The Decommissioning Timeline. This timeline includes all essential phases required by the OMA for a comprehensive decommissioning process. These phases cover permitting, environmental assessments, procurement, decontamination, dismantling, demolition, waste disposal, and the preparation of the Legacy Generation Asset for potential future use. 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.

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.

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

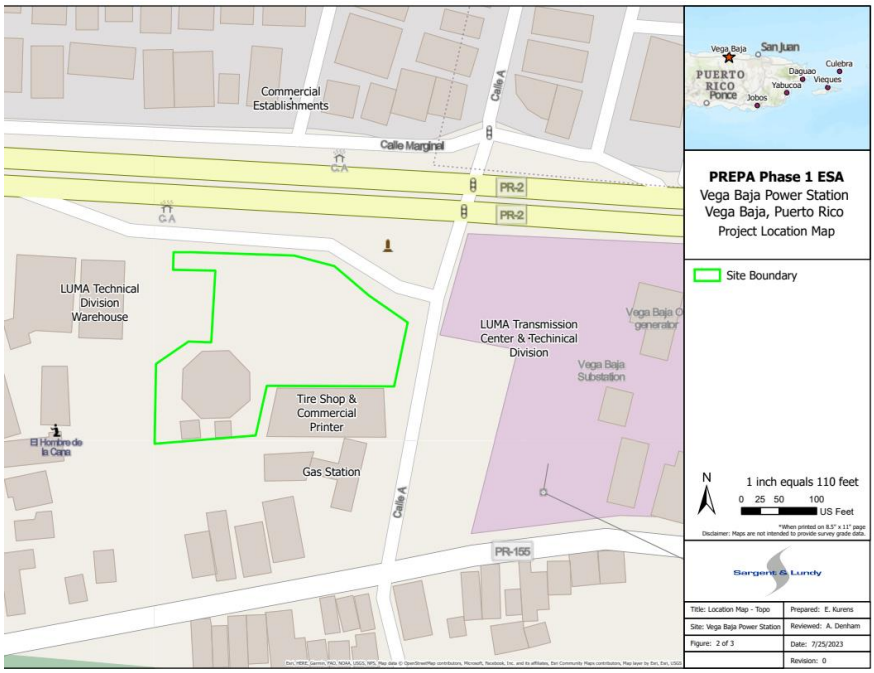
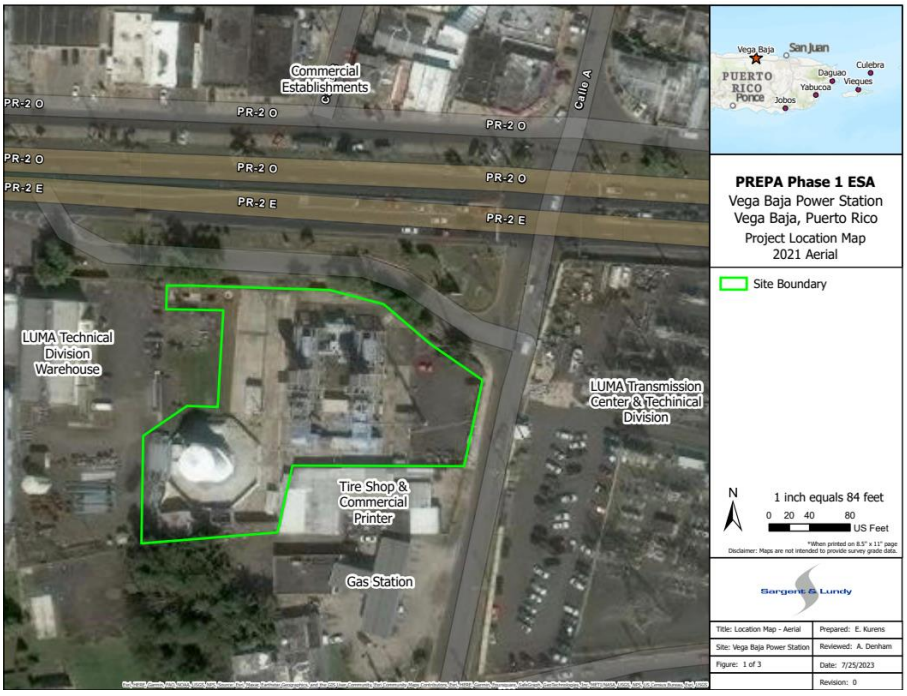


Figure 1-2 — Vega Baja Adjoining Property Information



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 photographical 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_2 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_2 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.

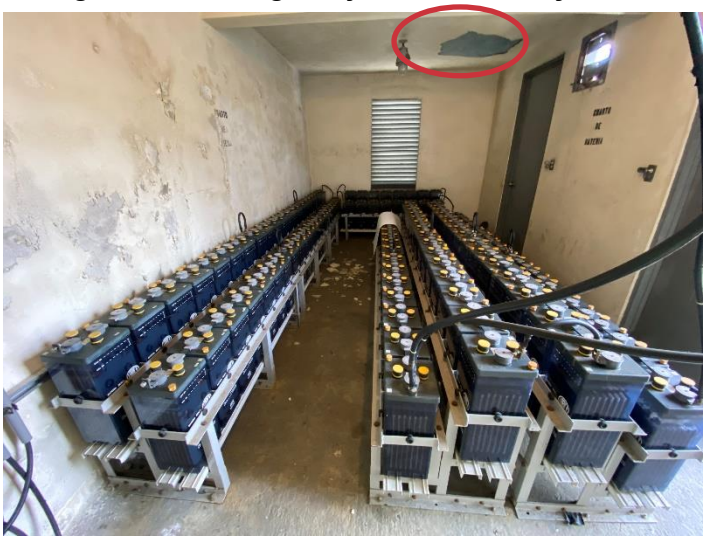
2.1.2.4. Balance-of-Plant (BOP) Equipment

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	**Figure 2-2 — Vega Baja Unit 1 Battery Room**  A large section of the battery room has debris falling from the ceiling onto the batteries and floor.
2	**Figure 2-3 — Vega Baja Unit 1 Batteries**   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.

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	**Figure 2-4 — Vega Baja Unit 1 Air Intake Structure Corroded Column**  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.

2.2. VEGA BAJA SAFETY

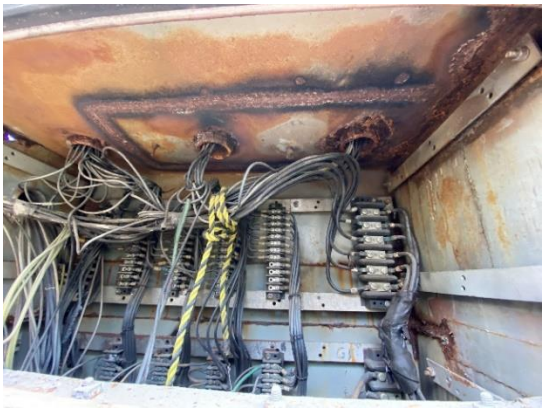
The following figures present the O&M Assessment Team's observed conditions regarding safety conditions.

Table 2-3 — Vega Baja Observed Safety Issues

Item	Condition
1	**Figure 2-5 — Vega Baja Storage Room**  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.
2	Several of the steps and access platforms to equipment exhibit serious corrosion.

Item	Condition
3	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.

Figure 2-6 — Vega Baja Junction Box Corrosion



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

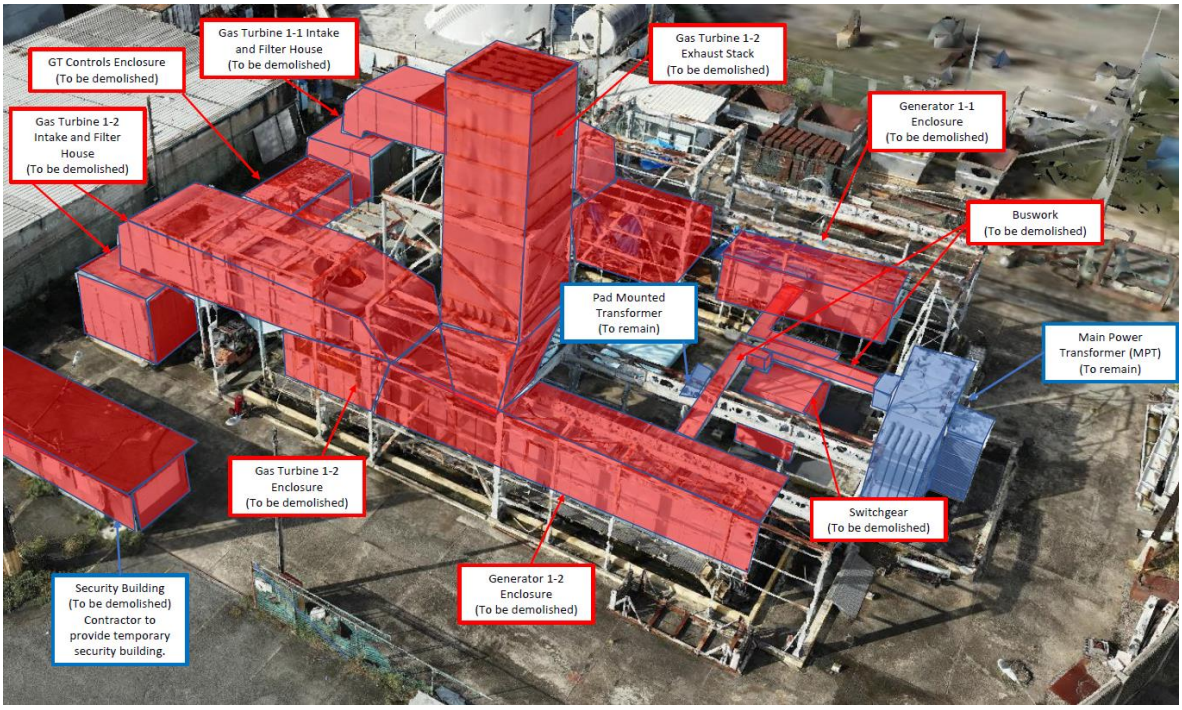


Figure 6-3 — Plant Materials, Equipment and Structures to be Demolished

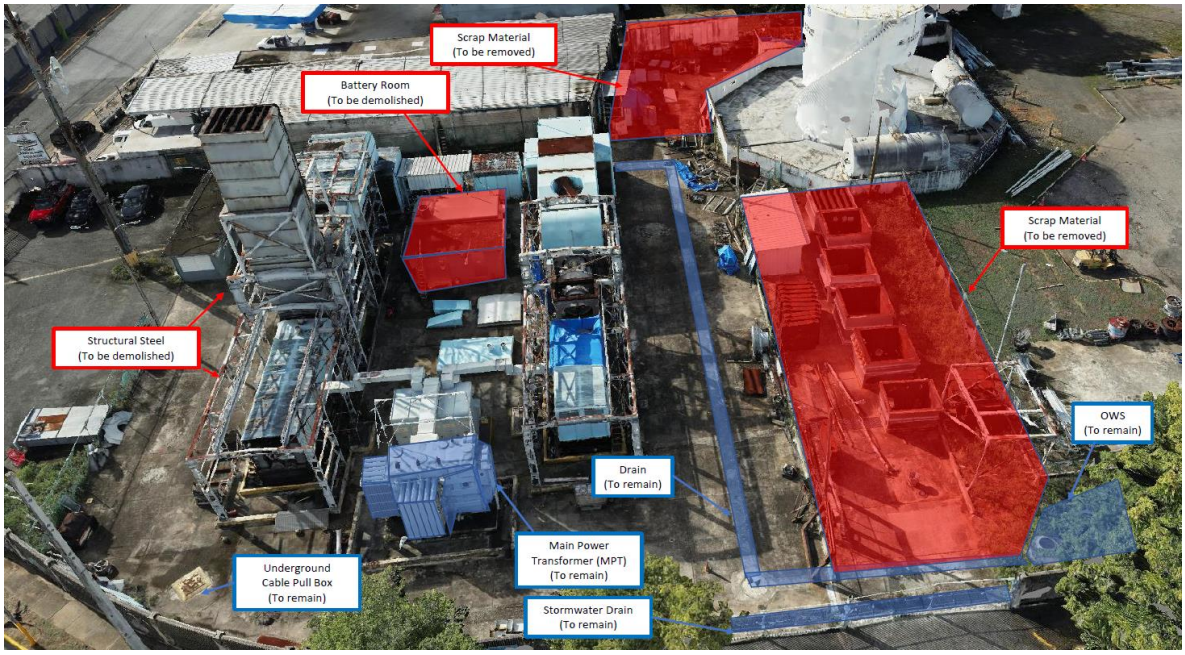


Figure 6-4 — Plant Materials, Equipment and Structures to be Demolished

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

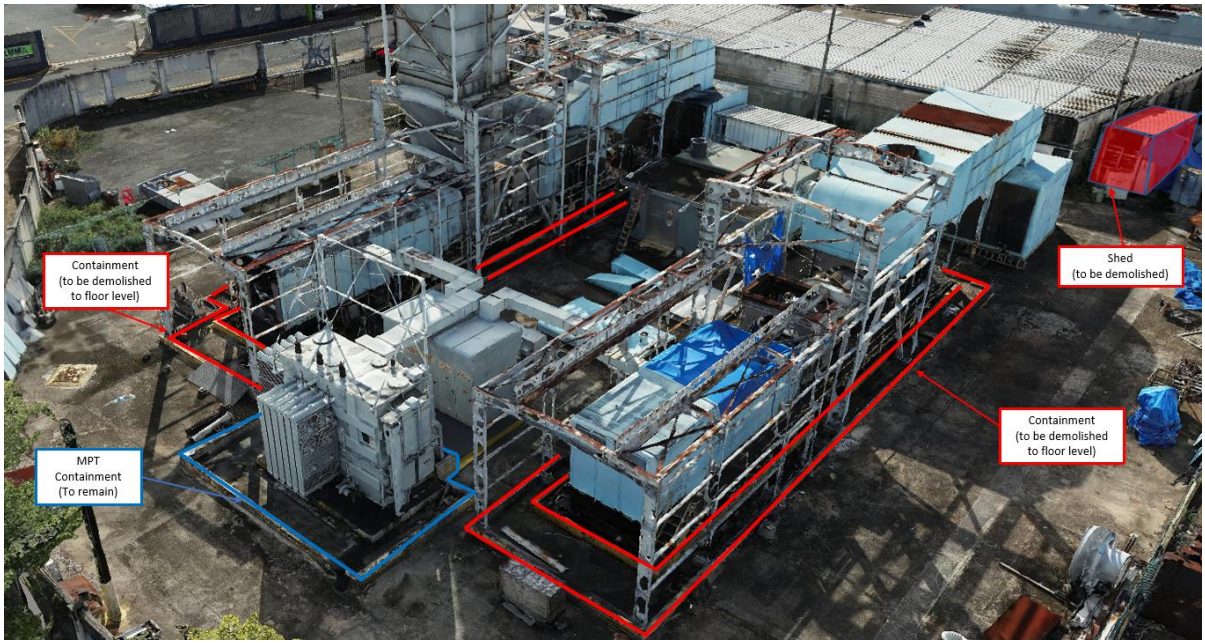
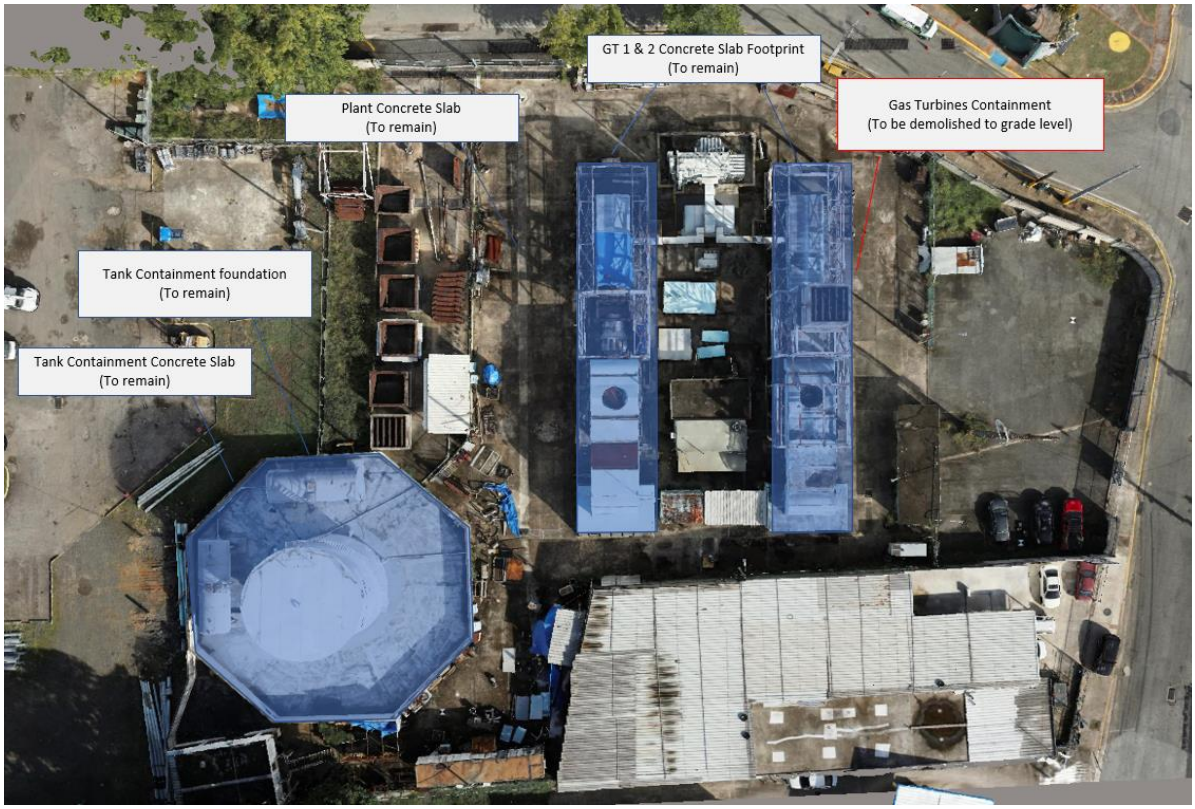


Figure 6-6 — Plant Materials, Equipment and Structures to be Demolished



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. Execution Timeline

7.1. EXECUTION TIMELINE

The detailed Development Timeline for the Vega Baja Decommissioning Plan is provided in Appendix C, outlining the submittal and approval milestones for both the Decommissioning Notice and the Decommissioning Plan.

A well-rounded plan for managing each phase of the Vega Baja Decommissioning Project is included in Appendix D–The Decommissioning Timeline. This timeline includes all essential phases required by the OMA for a comprehensive decommissioning process. These phases cover permitting, environmental assessments, procurement, decontamination, dismantling, demolition, waste disposal, and the preparation of the Legacy Generation Asset for potential future use.

The project timeline commences on February 1, 2024, and extends through July 31, 2025, establishing an estimated timeframe for the complete decommissioning of the Subject Property. Before issuing a Notice to Proceed (NTP) for demolition, several permitting and procurement steps had to be completed to obtain FEMA grant approval, as outlined below:

1. Federal Permitting: Essential federal permits, including the National Environmental Preservation Act (NEPA) Review and/or Environmental and Historic Preservation (EHP) Review, Endangered Species Act Section 7 Consultation, and National Historic Preservation Act Section 106 Consultation from State Historic Preservation Office (SHPO) had to be obtained. These approvals were prerequisites for FEMA grant award and were worked together between Genera, COR3 and FEMA teams.
2. Site studies, such as Geophysical, Topographic, Geotechnical, and Lead & Asbestos Assessments as well PR Department of Natural and Environmental Resources Rule 141 were needed to obtain a favorable FEMA review to make proposed works eligible under FEMA Public Assistance grant.

After FEMA's award, subject to Puerto Rico Energy Bureau's approval, decommission actions are scheduled to start on January 8, 2025:

1. Regulatory Approvals: The Energy Bureau must approve the Decommissioning Plan, and the Puerto Rico Public Private Partnerships Agency must approve the Demolition Contract.
2. Demolition Permit and Start Date: Upon finalization of the demolition contract, the contractor will apply for a Lead & Asbestos Removal permit. Following permit approval, the contractor will initiate survey and abatement activities, marking the official start date of decommissioning as January 8, 2025.

The demolition and decommissioning activities are anticipated to conclude within 29 weeks after the NTP, targeting July 31, 2025, as the completion date.

7.1.1. Potential Delays and Conditional Project Duration Risk

External approval requirements, highlighted in light red within the timeline, present potential delay risks. These approvals, not within Genera's control, have been allocated conditional project duration risks; any delays in these activities will warrant additional time for Genera to complete the remaining decommissioning tasks.

7.1.2. Asbestos and Lead-Based Paint Removal

An estimated 13 weeks is allocated for removing asbestos-containing materials (ACM) and lead-based paint (LBP), pending initial site assessments. This estimate allows for flexibility in addressing these materials should they be confirmed on-site, though actual duration may vary.

This refined version maintains the timeline's structure while enhancing clarity and focus on key milestones, potential risks, and considerations for hazardous materials.

7.2. DECOMMISSIONING 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, andTaking this into consideration,Obtain Approvals for the .Once.al. Then the contractor can begin theirFollowing the 29 weeks after the NTP, t,will bebut 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. The permitting activities are included in the timeline ~~and has been excluded from the Demolition Timeline~~ in ~~Appendix F~~Appendix D. 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 Decommissioning~~molition~~ 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 Decommissioning~~molition~~ 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 Decommissioning~~emolition~~ Timeline in ~~Appendix F~~Appendix D excludes work that addresses unforeseen conditions as well as any event constituting Force Majeure under the OMA or the Demolition Agreement, for which more time will be granted.

Table 7-1 — Conditional Project Duration Risks

No.	Issue	Description
1	Environmental Assessments and Permits	• Changes in environmental law and environmentally related permits. • Denial or delays in obtaining necessary environmental permits or approvals. • Unforeseen environmental contamination requiring additional remediation efforts.
2	Regulatory Compliance	• Denial or delay in obtaining necessary permits or approvals. • Changes in applicable law or regulatory requirements, or additional compliance measures imposed by authorities. • Changes in regulatory interpretation. • Changes in regulatory enforcement. • Extended review periods by regulatory agencies.
3	Site Conditions	• Need of additional space for any reason, including project development entailing an acquisition process. • Unforeseen technical difficulties in dismantling equipment or infrastructure. • Unanticipated structural issues or site conditions that complicate demolition. • Unforeseen site conditions whether subsurface or otherwise concealed. • Changes in the site conditions due to weather or otherwise.
4	Technical Challenges	• Unforeseen technical difficulties in decommissioning or dismantling equipment or infrastructure. • Delays due to the unforeseen need for specialized equipment or expertise.
5	Weather and Natural Events	• Adverse weather conditions impacting demolition activities. • Natural disasters (e.g., earthquakes, floods) causing delays.
6	Contractor and Resource Availability	• Limited availability or delay in obtaining qualified contractors or specialized personnel for whatever reason. • Limited availability or delays in the delivery of necessary equipment or materials, or other supply chain constraints. • Exceeding capacity limits of approved dumps for disposal of debris. • Unavailability of labor or subcontractors.
7	Health and Safety Concerns	• Unanticipated health and safety risks requiring additional precautions. • Implementation of HSE measures by a governmental authority for whatever reasons. • Incidents or accidents on-site necessitating work stoppages or investigations.

No.	Issue	Description
8	Stakeholder and Community Engagement	• Delays due to the need for additional stakeholder consultations or community engagement. • Public opposition to the project. • Interference from environmental, community, or social justice organizations. • Legal challenge seeking to contest the validity of the RFP, the demolition agreement, any permits, or any other transaction contemplated in the demolition contract.
9	Change Order Risk / Financial Constrains	• Unexpected cost overruns requiring additional financial planning and consulting with regulatory agencies to have budget and funding increases. • Change Order risk.
10	Logistical Issues	• Unforeseen changes with respect to the transportation permits and the means of transportation of debris. • Transportation, logistics or access issues affecting the movement of materials, equipment, and labor. • 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. • Coordination challenges with other ongoing projects or site activities.
11	Contractor Delays	• Failure of contractors and their subcontractors to execute tasks within the timeframes established in their contracts or subcontracts. • Delays caused by contractor and its subcontractors performance issues.
12	Labor-Related Issues:	• Delays due to labor strikes, work stoppages, or other union-related actions. • Negotiation challenges with unions affecting the availability of labor or the timeline for project execution. • Delays due to reduced productivity caused by labor disharmony.

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.

8. Decommissioning Budget

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

~~Appendix E~~Appendix G contains proposed monthly expenditure budgets and cash flow projections during which the decommissioning ~~molition~~ 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.).~~

8.2. 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.

8.2.1. 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.

8.2.2. 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 includesassumes 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.
- Genera 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 Generathe 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

8.2.3. 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.

8.2.4. 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.

8.2.5. 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).

8.2.6. 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[1]
- Temporary Facilities[1]
- Mobilization / Demobilization[1]
- Decommissioning Contractor Legal Expenses / Claims[1]
- Small Tools & Consumables[1]
- 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)

8.2.7. 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.

8.2.8. Escalation Rates

Escalation rates are excluded from this cost estimate.

8.2.9. 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.

8.3. COST ESTIMATE SUMMARY

The decommissioning cost estimate summary for the Subject Property is available in ~~Appendix D~~Appendix E. 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.

9. Health, Safety, Security, and Quality Management

9.1. GENERAL REQUIREMENTS

9.1.1. 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.

9.1.2. 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.

9.2. 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.

9.3. 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.

9.4. 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.

9.5. 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.

9.6. 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.

9.7. 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.

9.8. 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.

9.9. ACTIVITIES LIST

Table 9-1 below explains the Activities List developed to track items that will be salvaged or preserved throughout the Vega Baja decommissioning plan.

Table 9-1 — 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 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

10. Employee Transition

10.1. 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.

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 activites and any issues encountered**.**

(iv) An outline of planned activities for the next reporting period, including anticipated challenges and strategies for addressing them**.**

(v) **C**onfirmation 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.

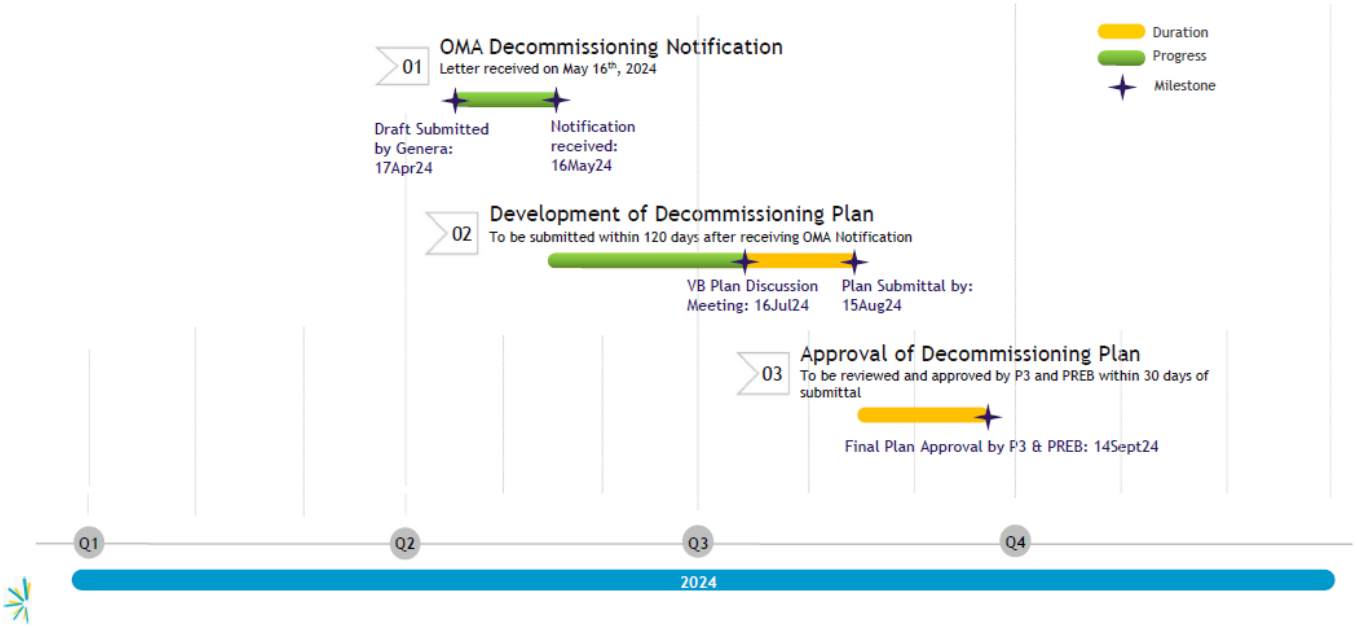
Appendix A.Vega Baja Decommissioning Notice

Appendix B.Vega Baja Community Relations Plan

Appendix C. Plan Development Timeline

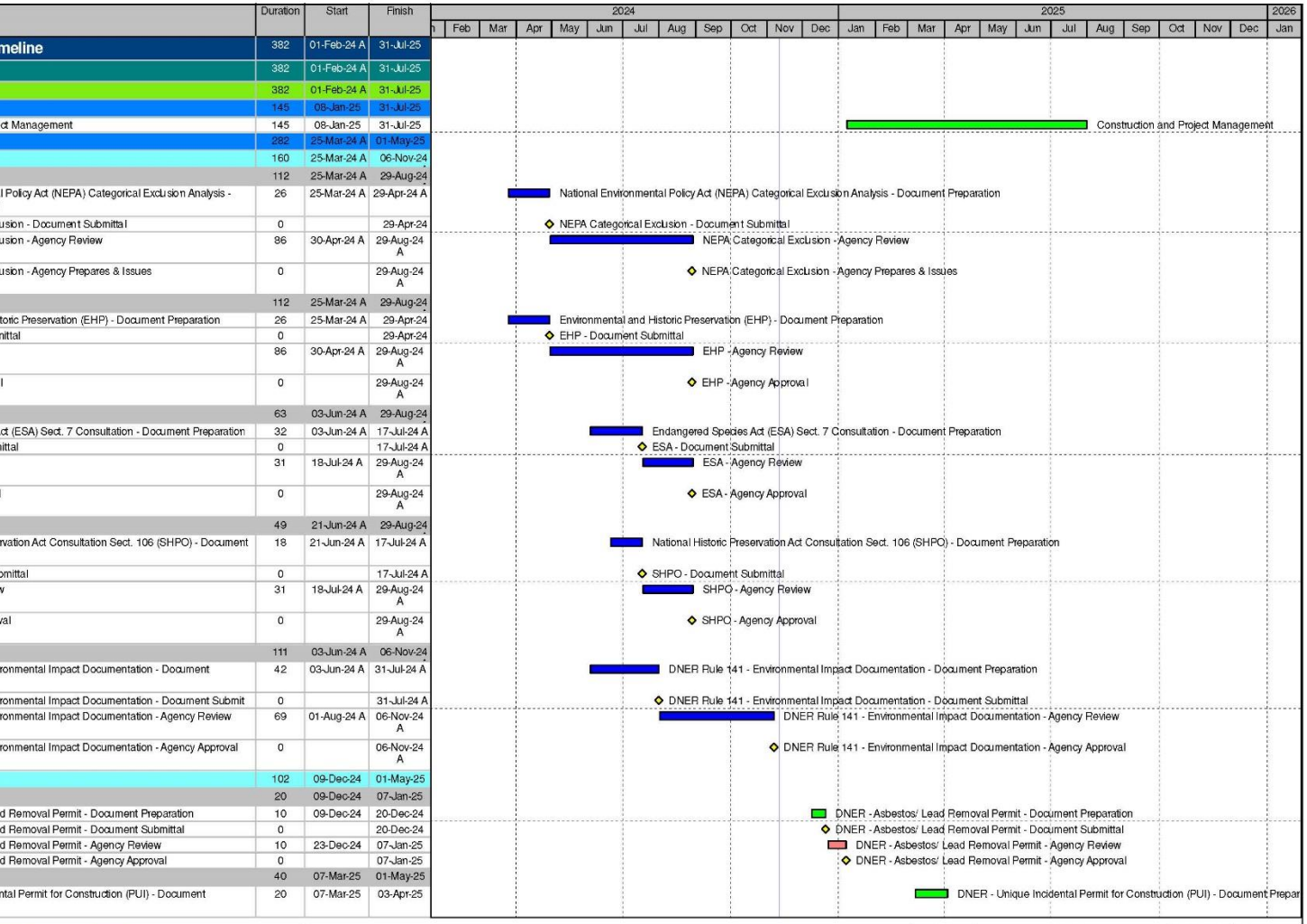
Vega Baja Decommissioning – Plan Development Timeline

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



~~Appendix C.~~Appendix D. Decommissioning~~molition~~ Timeline

Activity ID	Activity Name	Duration	Start	Finish
VB BESS - Decommissioning Timeline		382	01-Feb-24 A	31-Jul-25
Vega Baja Plant		382	01-Feb-24 A	31-Jul-25
BESS		382	01-Feb-24 A	31-Jul-25
Project Management		145	08-Jan-25	31-Jul-25
VB-B-PM000	Construction and Project Management	145	08-Jan-25	31-Jul-25
Permits		282	25-Mar-24 A	01-May-25
Pre-Construction		160	25-Mar-24 A	06-Nov-24
NEPA Review		112	25-Mar-24 A	29-Aug-24
VB-B-PERM836	National Environmental Policy Act (NEPA) Categorical Exclusion Analysis - Document Preparation	26	25-Mar-24 A	29-Apr-24 A
VB-B-PERM846	NEPA Categorical Exclusion - Document Submittal	0		29-Apr-24
VB-B-PERM856	NEPA Categorical Exclusion - Agency Review	86	30-Apr-24 A	29-Aug-24 A
VB-B-PERM866	NEPA Categorical Exclusion - Agency Prepares & Issues	0		29-Aug-24 A
EHP Review		112	25-Mar-24 A	29-Aug-24
VB-B-PERM876	Environmental and Historic Preservation (EHP) - Document Preparation	26	25-Mar-24 A	29-Apr-24
VB-B-PERM886	EHP - Document Submittal	0		29-Apr-24
VB-B-PERM896	EHP - Agency Review	86	30-Apr-24 A	29-Aug-24 A
VB-B-PERM906	EHP - Agency Approval	0		29-Aug-24 A
ESA Section 7 Consultation		63	03-Jun-24 A	29-Aug-24
VB-B-PERM916	Endangered Species Act (ESA) Sect. 7 Consultation - Document Preparation	32	03-Jun-24 A	17-Jul-24 A
VB-B-PERM926	ESA - Document Submittal	0		17-Jul-24 A
VB-B-PERM936	ESA - Agency Review	31	18-Jul-24 A	29-Aug-24 A
VB-B-PERM946	ESA - Agency Approval	0		29-Aug-24 A
SHPO Section 106 Consultation		49	21-Jun-24 A	29-Aug-24
VB-B-PERM956	National Historic Preservation Act Consultation Sect. 106 (SHPO) - Document Preparation	18	21-Jun-24 A	17-Jul-24 A
VB-B-PERM966	SHPO - Document Submittal	0		17-Jul-24 A
VB-B-PERM976	SHPO - Agency Review	31	18-Jul-24 A	29-Aug-24 A
VB-B-PERM986	SHPO - Agency Approval	0		29-Aug-24 A
DNER Rule 141		111	03-Jun-24 A	06-Nov-24
VB-B-PERM006	DNER Rule 141 - Environmental Impact Documentation - Document Preparation	42	03-Jun-24 A	31-Jul-24 A
VB-B-PERM016	DNER Rule 141 - Environmental Impact Documentation - Document Submit	0		31-Jul-24 A
VB-B-PERM026	DNER Rule 141 - Environmental Impact Documentation - Agency Review	69	01-Aug-24 A	06-Nov-24 A
VB-B-PERM036	DNER Rule 141 - Environmental Impact Documentation - Agency Approval	0		06-Nov-24 A
Construction Permits		102	09-Dec-24	01-May-25
DNER Asbestos/ Lead Removal		20	09-Dec-24	07-Jan-25
VB-B-PERM046	DNER - Asbestos/ Lead Removal Permit - Document Preparation	10	09-Dec-24	20-Dec-24
VB-B-PERM056	DNER - Asbestos/ Lead Removal Permit - Document Submittal	0		20-Dec-24
VB-B-PERM066-	DNER - Asbestos/ Lead Removal Permit - Agency Review	10	23-Dec-24	07-Jan-25
VB-B-PERM076	DNER - Asbestos/ Lead Removal Permit - Agency Approval	0		07-Jan-25
PUI		40	07-Mar-25	01-May-25
VB-B-PERM126	DNER - Unique Incidental Permit for Construction (PUI) - Document Preparation	20	07-Mar-25	03-Apr-25



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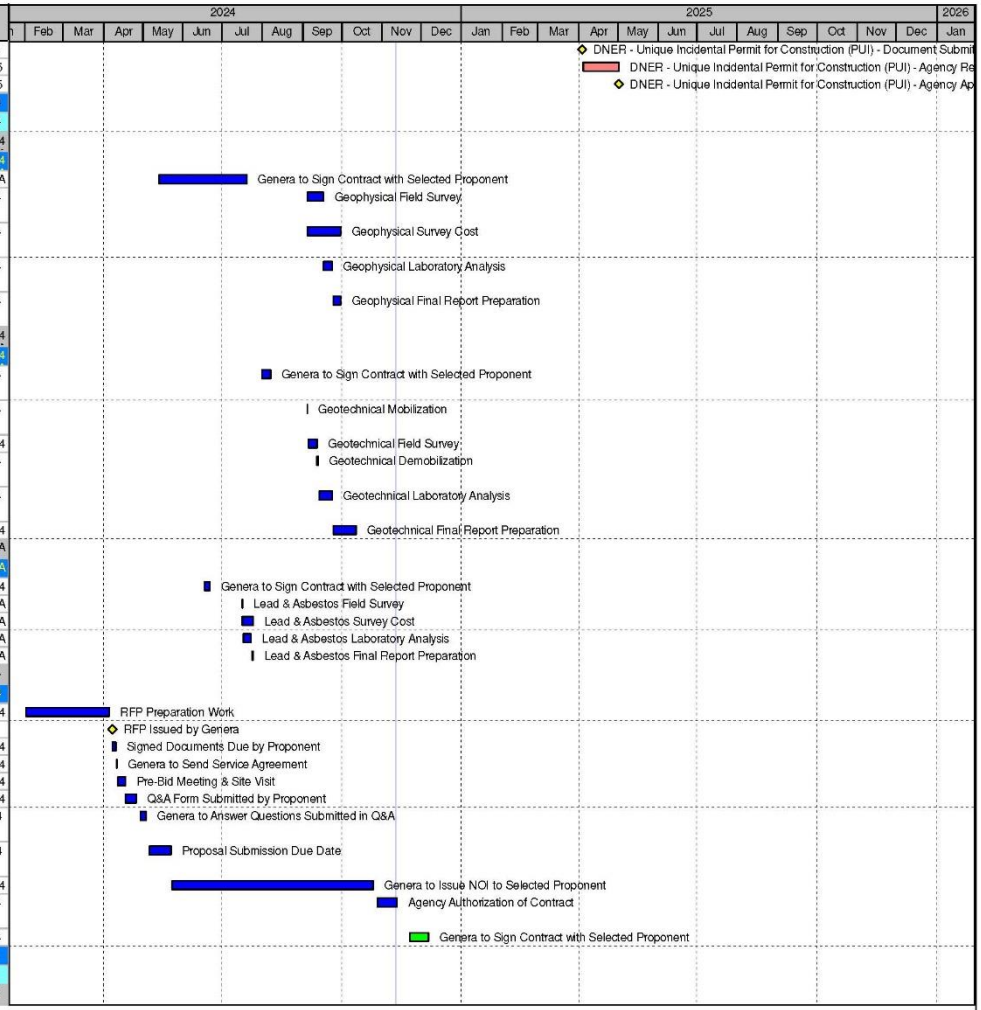
Remaining
Milestone

VB BESS - Decommissioning Timeline
Detail Progress Schedule

Date	Revision	Checked	Approved

Activity ID	Activity Name	Duration	Start	Finish
VB-B-PERM136	DNER - Unique Incidental Permit for Construction (PUI) - Document Submitt	0		03-Apr-25
VB-B-PERM146-	DNER - Unique Incidental Permit for Construction (PUI) - Agency Review	20	04-Apr-25	01-May-25
VB-B-PERM156	DNER - Unique Incidental Permit for Construction (PUI) - Agency Approval	0		01-May-25
Procurement		217	01-Feb-24 A	06-Dec-24
Contractors/ Subcontractors		217	01-Feb-24 A	06-Dec-24
Geophysical & Topographic Contractor		98	13-May-24	30-Sep-24
RFP for Geophysical & Topographic Survey		98	13-May-24	30-Sep-24
VB-B-C/S9540	Genera to Sign Contract with Selected Proponent	48	13-May-24	19-Jul-24 A
VB-B-ST1390	Geophysical Field Survey	9	04-Sep-24 A	16-Sep-24 A
Cost1	Geophysical Survey Cost	19	04-Sep-24 A	30-Sep-24 A
VB-B-ST1400	Geophysical Laboratory Analysis	5	17-Sep-24 A	23-Sep-24 A
VB-B-ST1410	Geophysical Final Report Preparation	5	24-Sep-24 A	30-Sep-24 A
Geotechnical Contractor		52	31-Jul-24 A	11-Oct-24
RFP for Geotechnical Survey		52	31-Jul-24 A	11-Oct-24
VB-B-C/S24360	Genera to Sign Contract with Selected Proponent	6	31-Jul-24 A	07-Aug-24 A
VB-B-ST3680	Geotechnical Mobilization	1	04-Sep-24 A	04-Sep-24 A
VB-B-ST3690	Geotechnical Field Survey	5	05-Sep-24	11-Sep-24
VB-B-ST3700	Geotechnical Demobilization	1	12-Sep-24 A	12-Sep-24 A
VB-B-ST3710	Geotechnical Laboratory Analysis	7	13-Sep-24 A	23-Sep-24 A
VB-B-ST3720	Geotechnical Final Report Preparation	14	24-Sep-24	11-Oct-24
Lead & Asbestos Contractor		27	17-Jun-24 A	24-Jul-24 A
RFQ for Lead & Asbestos Study		27	17-Jun-24 A	24-Jul-24 A
VB-B-C/S1340	Genera to Sign Contract with Selected Proponent	5	17-Jun-24 A	21-Jun-24
VB-B-ST310	Lead & Asbestos Field Survey	1	16-Jul-24 A	16-Jul-24 A
Cost3	Lead & Asbestos Survey Cost	7	16-Jul-24 A	24-Jul-24 A
VB-B-ST320	Lead & Asbestos Laboratory Analysis	5	17-Jul-24 A	23-Jul-24 A
VB-B-ST330	Lead & Asbestos Final Report Preparation	1	24-Jul-24 A	24-Jul-24 A
Demolition Contractor		217	01-Feb-24 A	06-Dec-24
RFP for Demolition Services		217	01-Feb-24 A	06-Dec-24
VB-B-C/S4850	RFP Preparation Work	47	01-Feb-24 A	05-Apr-24
VB-B-C/S101	RFP Issued by Genera	0	08-Apr-24 A	
VB-B-C/S111	Signed Documents Due by Proponent	3	08-Apr-24 A	10-Apr-24
VB-B-C/S120	Genera to Send Service Agreement	1	11-Apr-24 A	11-Apr-24
VB-B-C/S131	Pre-Bid Meeting & Site Visit	4	12-Apr-24 A	17-Apr-24
VB-B-C/S141	Q&A Form Submitted by Proponent	7	18-Apr-24 A	26-Apr-24
VB-B-C/S150	Genera to Answer Questions Submitted in Q&A	5	29-Apr-24 A	03-May-24 A
VB-B-C/S160	Proposal Submission Due Date	13	06-May-24 A	22-May-24 A
VB-B-C/S170	Genera to Issue NOI to Selected Proponent	109	23-May-24	25-Oct-24
VB-B-C/S190	Agency Authorization of Contract	12	28-Oct-24 A	12-Nov-24 A
VB-B-C/S180	Genera to Sign Contract with Selected Proponent	9	22-Nov-24	06-Dec-24
Construction		307	16-May-24	31-Jul-25
Site Preparation		307	16-May-24	31-Jul-25
Decommissioning		162	16-May-24	08-Jan-25



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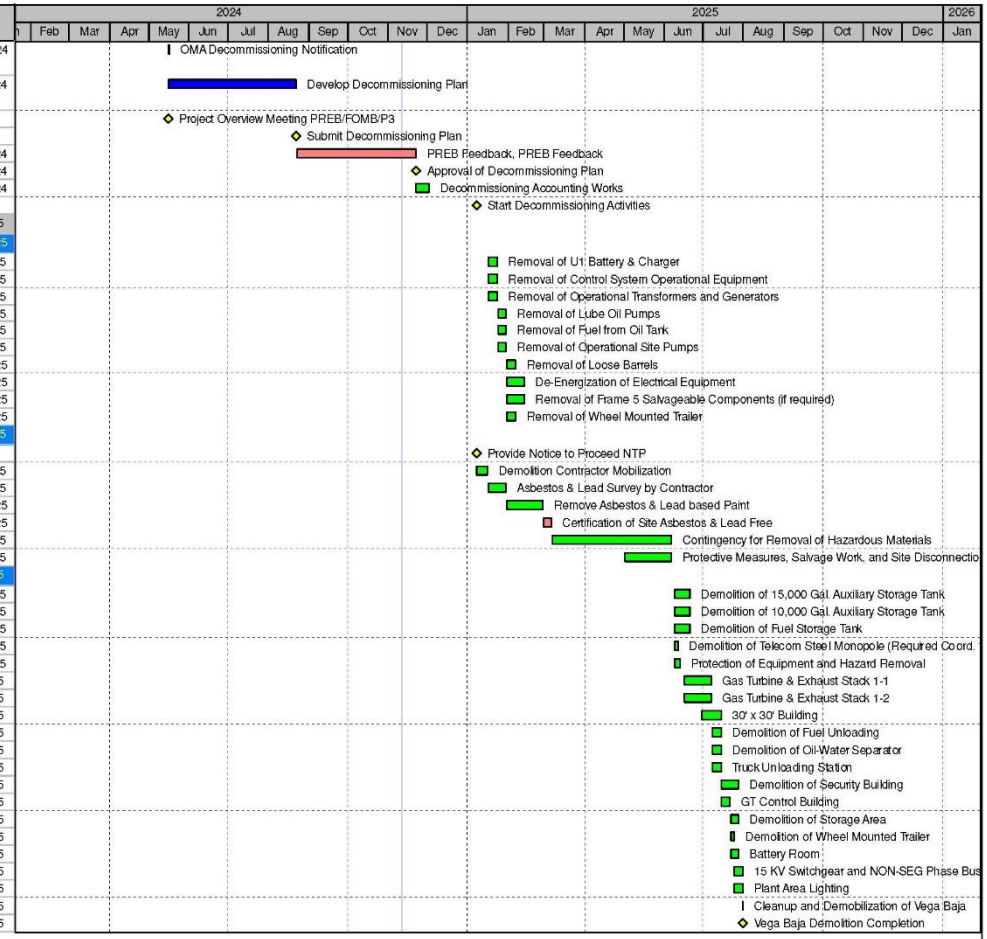
External to Genera

VB BESS - Decommissioning Timeline
Detail Progress Schedule

Date	Revision	Checked	Approved

Activity ID	Activity Name	Duration	Start	Finish
VB-B-DC010	OMA Decommissioning Notification	1	16-May-24 A	16-May-24 A
VB-B-DC020	Develop Decommissioning Plan	69	16-May-24 A	22-Aug-24 A
VB-B-DC000	Project Overview Meeting PREB/FOMB/P3	0	16-May-24	
VB-B-DC030	Submit Decommissioning Plan	0	22-Aug-24	
VB-B-DC040-E	PREB Feedback	65	23-Aug-24	22-Nov-24
VB-B-DC050-E	Approval of Decommissioning Plan	0		22-Nov-24
VB-B-DC061	Decommissioning Accounting Works	5	22-Nov-24	02-Dec-24
VB-B-DC071	Start Decommissioning Activities	0	08-Jan-25	
Demolition		145	08-Jan-25	31-Jul-25
Decommissioning Services		20	17-Jan-25	13-Feb-25
VB-B-DM4040	Removal of U1 Battery & Charger	5	17-Jan-25	23-Jan-25
VB-B-DM4060	Removal of Control System Operational Equipment	5	17-Jan-25	23-Jan-25
VB-B-DM4080	Removal of Operational Transformers and Generators	5	17-Jan-25	23-Jan-25
VB-B-DM4090	Removal of Lube Oil Pumps	5	24-Jan-25	30-Jan-25
VB-B-DM4100	Removal of Fuel from Oil Tank	5	24-Jan-25	30-Jan-25
VB-B-DM4110	Removal of Operational Site Pumps	5	24-Jan-25	30-Jan-25
VB-B-DM4120	Removal of Loose Barrels	5	31-Jan-25	06-Feb-25
VB-B-DM4140	De-Energization of Electrical Equipment	10	31-Jan-25	13-Feb-25
VB-B-DM4150	Removal of Frame 5 Salvageable Components (if required)	10	31-Jan-25	13-Feb-25
VB-B-DM4250	Removal of Wheel Mounted Trailer	5	31-Jan-25	06-Feb-25
Demolition Preparation		107	08-Jan-25	06-Jun-25
VB-B-DM4030	Provide Notice to Proceed NTP	0	08-Jan-25	
VB-B-DM060	Demolition Contractor Mobilization	7	08-Jan-25	16-Jan-25
VB-B-DM080	Asbestos & Lead Survey by Contractor	10	17-Jan-25	30-Jan-25
VB-B-DM4050	Remove Asbestos & Lead based Paint	20	31-Jan-25	27-Feb-25
VB-B-DM4010-E	Certification of Site Asbestos & Lead Free	5	28-Feb-25	06-Mar-25
VB-B-DM4240	Contingency for Removal of Hazardous Materials	65	07-Mar-25	06-Jun-25
VB-B-DM070	Protective Measures, Salvage Work, and Site Disconnections	25	02-May-25	06-Jun-25
General Demolition		38	09-Jun-25	31-Jul-25
VB-B-DM380	Demolition of 15,000 Gal. Auxiliary Storage Tank	10	09-Jun-25	20-Jun-25
VB-B-DM390	Demolition of 10,000 Gal. Auxiliary Storage Tank	10	09-Jun-25	20-Jun-25
VB-B-DM790	Demolition of Fuel Storage Tank	10	09-Jun-25	20-Jun-25
VB-B-DM630	Demolition of Telecom Steel Monopole (Required Coord. w/ LUMA)	3	09-Jun-25	11-Jun-25
VB-B-DM4070	Protection of Equipment and Hazard Removal	5	09-Jun-25	13-Jun-25
VB-B-DM4160	Gas Turbine & Exhaust Stack 1-1	15	16-Jun-25	07-Jul-25
VB-B-DM4170	Gas Turbine & Exhaust Stack 1-2	15	16-Jun-25	07-Jul-25
VB-B-DM4180	30' x 30' Building	10	30-Jun-25	14-Jul-25
VB-B-DM940	Demolition of Fuel Unloading	5	08-Jul-25	14-Jul-25
VB-B-DM230	Demolition of Oil-Water Separator	5	08-Jul-25	14-Jul-25
VB-B-DM4190	Truck Unloading Station	5	08-Jul-25	14-Jul-25
VB-B-DM620	Demolition of Security Building	10	15-Jul-25	28-Jul-25
VB-B-DM4200	GT Control Building	5	15-Jul-25	21-Jul-25
VB-B-DM920	Demolition of Storage Area	5	22-Jul-25	28-Jul-25
VB-B-DM930	Demolition of Wheel Mounted Trailer	3	22-Jul-25	24-Jul-25
VB-B-DM4210	Battery Room	5	22-Jul-25	28-Jul-25
VB-B-DM4220	15 KV Switchgear and NON-SEG Phase Busduct	5	25-Jul-25	31-Jul-25
VB-B-DM4230	Plant Area Lighting	5	25-Jul-25	31-Jul-25
VB-B-DM950	Cleanup and Demobilization of Vega Baja	1	31-Jul-25	31-Jul-25
VB-B-DM960	Vega Baja Demolition Completion	0		31-Jul-25



Actual
Remaining
Milestone
External to Genera

VB BESS - Decommissioning Timeline
Detail Progress Schedule

Date	Revision	Checked	Approved

~~Appendix D.~~Appendix E. 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
Total		**$2,5~~6~~80,944**

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 E.~~Appendix F. 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	$ -	$ -	$ -	$ -	$ -
3	*Section 3 Subtotal*	*$ -*	*$ -*	*$ -*	*$ -*	*$ -*
4	Environment and Permitting	$ 123,000	$ -	$ -	$ -	$ 123,000
4	*Section 4 Subtotal*	*$ 123,000*	*$ -*	*$ -*	*$ -*	*$ 123,000*
5	Protective Measures, Salvage Work, and Site Disconnections by Genera	*$ -*	*$ -*	*$ 330,890*	*$ -*	*$ 330,890*
5	*Section 5 Subtotal*	*$ -*	*$ -*	*$ 330,890*	*$ -*	*$ 330,890*
6	*Dismantling, Demolition, & Site Restoration*					
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	*Section 6 Subtotal*	*$ 406,758*	*$ 2,000*	*$ 134,253*	*$ 130,750*	*$ 673,761*
7	*Decontamination, Waste Disposal, and Remediation*					
7.1	Lead and Asbestos (Testing Only)	$ 20,000	$ -	$ -	$ -	$ 20,000
7.1	Contingency (environmental delays, remediation, etc.)	$ 595,602				$ 595,602
7	*Section 7 Subtotal*	*$ 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	*Section 8 Subtotal*	*$ 305,000*	*$ -*	*$ 180,691*	*$ -*	*$ 485,691*
9	Health, Safety, Security, and Quality Management (included in Section 6 costs)	$ -	$ -	$ -	$ -	$ -
9	*Section 9 Subtotal*	*$ -*	*$ -*	*$ -*	*$ -*	*$ -*
12	Construction and Project Management	$ -	$ -	$ 332,000	$ -	$ 332,000
12	*Section 12 Subtotal*	*$ -*	*$ -*	*$ 332,000*	*$ -*	*$ 332,000*
	Total Decommissioning Plan Cost	**$ 1,450,360**	**$ 2,000**	**$ 977,834**	**$ 130,750**	**$ 2,560,944**

~~Appendix F.~~Appendix G. Monthly Decommissioning Cash Flow~~Monthly Cashflow of Decommissioning ctivities~~

GeneraPR

Strictly Confidential

Activity ID	Description	Duration (Months)	Cost	1-Nov-24	1-Dec-24	1-Jan-25	1-Feb-25	1-Mar-25	1-Apr-25	1-May-25	1-Jun-25	1-Jul-25
	Administrative											
1	Construction and Project Management	7	$332,000			$41,213.79	$45,793.10	$48,082.76	$50,372.41	$48,082.76	$48,082.76	$50,372.41
	Total Administrative (A)		$332,000	-	-	$41,214	$45,793	$48,083	$50,372	$48,083	$48,083	$50,372
	Phase 1: Environmental & Permitting											
2	NEPA Documentation Preparation	1	$33,750	$33,750.00	-	-	-	-	-	-	-	-
3	ESA Documentation Preparation	1	$5,625	$5,625.00	-	-	-	-	-	-	-	-
4	SHPO Documentation Preparation	1	$5,625	$5,625.00	-	-	-	-	-	-	-	-
5	DNER Rule 141 - Environmental Impact Documentation	1	$35,000	$35,000.00	-	-	-	-	-	-	-	-
6	DNER - Unique Incidental Permit for Construction (PUI)	2	$28,000	-	-	-	-	$23,800.00	$4,200	-	-	-
7	DNER - Asbestos/ Lead Removal Permit	1	$15,000	-	$15,000.00	-	-	-	-	-	-	-
	Total Phase 1: Environmental & Permitting (B)		$123,000	$80,000.00	$15,000.00	$0.00	$0.00	$23,800.00	$4,200.00	$0.00	$0.00	$0.00
	Phase 2: Pre-Demolition Activities											
8	Geophysical Survey Cost	1	$18,350	$18,350.00	-	-	-	-	-	-	-	-
9	Lead & Asbestos Survey Cost	1	$20,000	$20,000.00	-	-	-	-	-	-	-	-
10	Removal of U1 Battery & Charger	1	$20,000	-	-	$20,000.00	-	-	-	-	-	-
11	Removal of Control System Operational Equipment	1	$13,805	-	-	$13,805.00	-	-	-	-	-	-
12	Removal of Operational Transformers and Generators	1	$220,000	-	-	$220,000.00	-	-	-	-	-	-
13	Removal of Lube Oil Pumps	1	$25,000	-	-	$25,000.00	-	-	-	-	-	-
14	Removal of Operational Site Pumps	1	$22,329	-	-	$22,328.74	-	-	-	-	-	-
15	Removal of Loose Barrels	2	$2,108	-	-	$421.56	$1,686.25	-	-	-	-	-
16	De-Energization of Electrical Equipment	2	$33,007	-	-	$3,300.72	$29,706.44	-	-	-	-	-
17	Removal of Frame 5 Salvageable Components (if required)	2	$109,442	-	-	$10,944.23	$98,498.07	-	-	-	-	-
18	Removal of Wheel Mounted Trailer	2	$20,000	-	-	$4,000.00	$16,000.00	-	-	-	-	-
19	Contingency for Removal of Hazardous Materials	4	$595,602	-	-	-	-	$155,772.83	$201,588.37	$192,425.26	$45,815.54	-
20	Protective Measures, Salvage Work, and Site Disconnections	2	$330,890	-	-	-	-	-	-	$264,712.00	$66,178.00	-
21	Removal of Fuel from Oil Tank	1	$20,000	-	-	$20,000.00	-	-	-	-	-	-
	Total Phase 2: Pre-Demolition Activities (C)		$1,450,533	$38,350.00	$0.00	$339,800.25	$145,890.76	$155,772.83	$201,588.37	$457,137.26	$111,993.54	$0.00
	Phase 3: Above-Ground Dismantling and Demolition Activities											
22	Demolition of 15,000 GaL Auxiliary Storage Tank	1	$51,043	-	-	-	-	-	-	-	$51,042.50	-
23	Demolition of 10,000 GaL Auxiliary Storage Tank	1	$51,043	-	-	-	-	-	-	-	$51,042.50	-
24	Demolition of Fuel Storage Tank	1	$51,043	-	-	-	-	-	-	-	$51,042.50	-
25	Demolition of Telecom Steel Monopole (Required Coord. w/ LUMA)	1	$15,313	-	-	-	-	-	-	-	$15,312.75	-
26	Protection of Equipment and Hazard Removal	1	$25,521	-	-	-	-	-	-	-	$25,521.25	-
27	Gas Turbine & Exhaust Stack 1-1	2	$76,564	-	-	-	-	-	-	-	$56,146.75	$20,417.00
28	Gas Turbine & Exhaust Stack 1-2	2	$76,564	-	-	-	-	-	-	-	$56,146.75	$20,417.00
29	30' x 30' Building	2	$51,043	-	-	-	-	-	-	-	$5,104.25	$45,938.25
30	Demolition of Fuel Unloading	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
31	Demolition of Oil-Water Separator	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
32	Truck Unloading Station	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
33	Demolition of Security Building	1	$32,693	-	-	-	-	-	-	-	-	$32,692.50
34	GT Control Building	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
35	Demolition of Storage Area	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
36	Demolition of Wheel Mounted Trailer	1	$15,313	-	-	-	-	-	-	-	-	$15,312.75
37	Battery Room	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
38	15 KV Switchgear and NON-SEG Phase Busduct	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
39	Plant Area Lighting	1	$25,521	-	-	-	-	-	-	-	-	$25,521.25
40	Cleanup and Demobilization of Vega Baja	1	$5,104	-	-	-	-	-	-	-	-	$5,104.25
	Total Phase 3: Above-Ground Dismantling and Demolition Activities (D)		$655,411	-	-	-	-	-	-	-	$311,359	$344,052
	Total Demolition Cost (A) + (B) + (C) + (D)		$2,560,944	$118,350	$15,000	$381,014	$191,684	$227,656	$256,161	$505,220	$471,436	$394,424

GeneraPR