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

IN RE:	**CASE NO. NEPR-MI-2021-0002**
IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN-DECEMBER 2020	**SUBJECT: Motion Submitting Three FEMA Approvals of Projects, Request for Confidential Treatment, and Supporting Memorandum of Law**

MOTION SUBMITTING THREE FEMA APPROVALS OF PROJECTS, REQUEST FOR CONFIDENTIAL TREATMENT AND SUPPORTING MEMORANDUM OF LAW

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and **LUMA Energy ServCo, LLC**, (jointly referred to as "LUMA"), through the undersigned legal counsel and, respectfully submits the following:

I. Submittal of Three FEMA Approvals and Request for Confidentiality

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority ("PREPA") submit to the Energy Bureau the specific transmission and distribution projects ("T&D Projects" or "Projects") to be funded with Federal Emergency Management Agency ("FEMA") funds or any other federal funds at least thirty (30) calendar days prior to submitting these Projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency ("COR3"), FEMA or any other federal agency ("March 26th Order"). It also directed PREPA to continue reporting to the Energy Bureau and FEMA, within the next five years, the progress of all ongoing efforts related to the approval of the submitted Projects not yet approved by the Energy Bureau. The Energy Bureau thereafter determined that this directive should be applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 30, 2021, LUMA filed a *Motion Requesting Clarification of a Portion of the Energy Bureau's Resolution and Order Entered on August 20, 2021, and Submitting Updated List of Transmission and Distribution Projects and Twenty-Nine Scopes of Work* ("August 30th Motion"). In the August 30th Motion, LUMA submitted twenty-nine (29) SOWs for T&D Projects for the Energy Bureau's review and approval prior to submitting them to COR3 and FEMA. Among the twenty-nine SOWs, LUMA submitted the "Distribution Pole and Conductor Replacement" SOW, which encompassed pole and conductor replacement projects throughout Puerto Rico.

3. On September 22, 2021, the Energy Bureau issued a Resolution and Order that determined that most of the SOWs for T&D projects submitted by LUMA were necessary to improve the system's reliability ("September 22nd Order"). Therefore, it approved most of the projects presented in the August 30th Motion, including the "Distribution Pole and Conductor Replacement" SOW. The Energy Bureau also ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project within ten (10) days of receiving such approval.

4. As shown in Exhibit 1 of the Motion filed on January 24, 2022, *Motion Submitting Updates List of Transmission and Distribution Projects and Three Scopes of Work*, and most recently in Exhibit 5 of the Motion filed on July 31, 2024, *Motion Submitting Three Amended Scopes of Work, and One Scope of Work, an Updated Project List, and Request for Confidentiality and Supporting Memorandum of Law*, the "Distribution Pole and Conductor Replacement" SOW is divided into individual projects per region, which includes the "FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)," "FAASt [Pole and Conductor Repair -Ponce

Group 1 - Phase 2] (Distribution)," and "FAASt [Pole and Conductor Repair -Mayaguez Group 1 - Phase 2]" T&D Projects.

5. In compliance with the September 22nd Order, LUMA hereby submits copies of the approvals by FEMA issued on November 25, 2024, of the "FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)," "FAASt [Pole and Conductor Repair -Ponce Group 1 - Phase 2] (Distribution)," and "FAASt [Pole and Conductor Repair -Mayaguez Group 1 - Phase 2]" T&D Projects.[1] *See* **Exhibit 1**[2] to this Motion. The document contains FEMA's approvals and includes the costs obligated for each Project.

6. LUMA is submitting herein a redacted public version of the FEMA approvals (**Exhibit 1**) protecting confidential information associated with Critical Energy Infrastructure Information ("CEII"). As explained in this Motion, portions of the FEMA approvals of the T&D Projects are protected from disclosure as CEII, *see, e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. § 388.113 (2020), and pursuant to the Energy Bureau's Policy on Management of Confidential Information. *See* Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.

II. Memorandum of Law in Support of Request for Confidentiality

A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau

7. The bedrock provision on the management of confidential information filed before this Energy Bureau, is Section 6.15 of Act 57-2014, known as the "Puerto Rico Energy

[1] It is important to note that LUMA acquires knowledge of any FEMA approval for a T&D Project once FEMA makes the information available via its grant portal.
[2] Please note that **Exhibit 1** has digitalization and table format issues, which are found on the documents as issued by FEMA.

Transformation and Relief Act." It provides, in pertinent part, that: "[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such […]" 22 LPRA § 1054n. If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, "it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* § 1054n(a).

8. Access to confidential information shall be provided "only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement." *Id.* § 1054n(b). Finally, Act 57-2014 provides that this Energy Bureau "shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review." *Id.* § 1054n(c).

9. Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico.

10. Moreover, the Energy Bureau's Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential

information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ⁋ 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* at ⁋ 6.

11. The Energy Bureau's Policy on Management of Confidential Information states the following with regard to access to validated CEII:

> Critical Energy Infrastructure Information ("CEII")
>
> The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties' authorized representatives only after they have executed and delivered the Nondisclosure Agreement.
>
> Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

Id. at § D (on Access to Validated Confidential Information).

12. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that "a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant

to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed according to […] Article 6.15 of Act No. 57-2015, as amended." *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms,* § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

B. Request for Confidentiality

13. The FEMA approvals included in **Exhibit 1** contain portions of CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the FEMA approvals with CEII warrant confidential treatment to protect critical infrastructure from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII under seal of confidentiality.[3] In at least two Data Security and Physical Security proceedings,[4]

[3] *See e.g., In re Review of LUMA's System Operation Principles,* NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority's System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA's Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan,* NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrid Transmission and Distribution Investments*, NEPR-MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII. However, *see* Resolution and Order of February 12, 2021, reversing in part, grant of confidential designation).

[4] *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan,* NEPR-MI-2020-0018.

this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure.

14. Additionally, this Energy Bureau has granted requests by LUMA to protect CEII in connection with LUMA's System Operation Principles. *See* Resolution and Order of May 3, 2021, table 2 on page 4, Case No. NEPR-MI-2021-0001 (granting protection to CEII included in LUMA's Responses to Requests for Information). Similarly, in the proceedings on LUMA's proposed Initial Budgets and System Remediation Plan, this Energy Bureau granted confidential designation to several portions of LUMA's Initial Budgets and Responses to Requests for Information. *See* Resolution and Order of April 22, 2021, on Initial Budgets, Table 2 on pages 3-4, and Resolution and Order of April 22, 2021, on Responses to Requests for Information, table 2 on pages 8-10, Case No. NEPR-MI-2021-0004; Resolution and Order of April 23, 2021, on Confidential Designation of Portions of LUMA's System Remediation Plan, table 2 on page 5, and Resolution and Order of May 6, 2021, on Confidential Designation of Portions of LUMA's Responses to Requests for Information on System Remediation Plan, table 2 at pages 7-9, Case No. NEPR-MI-2020-0019.

15. Similarly, the Energy Bureau has granted LUMA's requests for confidential treatment of portions of the FEMA approvals submitted for approval in the present case. Notably, the Energy Bureau has granted LUMA's request for confidential treatment of portions of FEMA Approvals of Projects submitted for consideration and authorization. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

16. As mentioned above, the Energy Bureau's Policy on Management of Confidential Information provides for the management of CEII. It directs that the parties' authorized representatives access information validated as CEII only after executing and delivering a Non-Disclosure Agreement.

17. CEII or critical infrastructure information is generally exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

> Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:
> (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
> (ii) Could be useful to a person in planning an attack on critical infrastructure;
> (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
> (iv) Does not simply give the general location of the critical infrastructure.

Id.

18. Additionally, "[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, "[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters." *Id.*

19. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information ("CII").[5] CII is defined as "information not customarily in the public domain and related to the security of critical infrastructure or protected systems [...]" 6 U.S.C. § 671 (3).[6]

[5] Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

(A) shall be exempt from disclosure under the Freedom of Information Act;
(B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision-making official;
(C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
(D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
(i) in furtherance of an investigation or the prosecution of a criminal act; or
(ii) when disclosure of the information would be--
(I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
(II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office
(E) shall not, be provided to a State or local government or government agency; of information or records;
(i) be made available pursuant to any State or local law requiring disclosure of information or records;
(ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or
(iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.
(F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

[6] CII includes the following types of information:

(A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;

20. Portions of the FEMA approvals in **Exhibit 1** qualify as CEII because each of these documents contains the express coordinates and physical addresses to power transmission and distribution facilities (18 C.F.R. § 388.113(iv)), and these specific coordinates and addresses could potentially be helpful to a person planning an attack on the energy facilities listed as part of this FEMA approval. The information identified as confidential in this paragraph is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that, on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of the FEMA approvals with CEII in **Exhibit 1** from disclosure, given the nature and scope of the details included in those portions of the Exhibit.

21. Based on the above, LUMA respectfully submits that portions of the FEMA approvals should be designated as CEII. This designation is a reasonable and necessary measure to protect the specific location of the energy facilities listed or discussed in the FEMA approvals in **Exhibit 1**. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that these materials constitute CEII that should be maintained confidentially to safeguard their integrity and protect them from external threats.

(B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or
(C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

C. Identification of Confidential Information

22. In compliance with the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009) below, find a table summarizing the portions of the FEMA approvals for which we present this request for confidential treatment.

Document	**Name**	**Pages in which Confidential Information is Found, if applicable**	**Summary of Legal Basis for Confidentiality Protection, if applicable**	**Date Filed**
Exhibit 1	FAASt [Pole and Conductor Repair-Carolina Group 2-Phase 2] (Distribution)	Pages 1, 2, 8, and 15	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	December 3, 2024
Exhibit 1	FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)	Pages 1, 2, 7, and 13	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	December 3, 2024
Exhibit 1	FAASt [Pole and Conductor Repair - Mayaguez Group 1 - Phase 2]	Pages 1, 2, 7, and 14	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	December 3, 2024

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the copies of the FEMA approvals attached herein as **Exhibit 1**; and **grant** the request for confidential treatment of **Exhibit 1**.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this motion to counsel for PREPA Alexis Rivera, arivera@gmlex.net, and to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfr@sbgblaw.com and Alejandro López Rodríguez, alopez@sbgblaw.com.

In San Juan, Puerto Rico, on this 3rd day of December 2024.

DLA Piper (Puerto Rico) LLC
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Exhibit 1

Three (3) FEMA Approvals

Department of Homeland Security
Federal Emergency Management Agency

General Info

Project #	738120 **P/W #** 11850	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)	**Event**	4339DR-PR (4339DR)
Project Size	Large	**Declaration Date**	9/20/2017
Activity Completion Date	9/20/2027	**Incident Start Date**	9/17/2017
		Incident End Date	11/15/2017
Process Step	Obligated		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #454626; FAASt [Pole and Conductor Repair - Carolina Group 2 - Phase 2] (FAJARDO, SUB.2005-10,CANOVANAS PUEBLO, SUB. 2401-01,RIO GRANDE,SUB. 2301-02,PALMER, SUB. 2305-02, LAS MERCEDES, SUB. 2403)

DDD for this facility codified in the 136271 - MEPA078 Puerto Rico Electrical Power Authority Island Wide FAASt Project.

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Icacos Dam
- **Facility Description:** The specific facilities included in this project are: poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cable, underground cable systems, fault interrupting equipment (fuses, reclosers, and sectionalizes), and any other associated components
- **Approx. Year Built:** 1980
- **GPS Latitude/Longitude:** [redacted]

General Damage Information:

- **Date Damaged:** 9/20/2017
- **Cause of Damage:** High winds & wind driven rain, caused by Cat 4 Hurricane Maria

Final Scope

454626 **FAASt [Pole and Conductor Repair -**

Introduction

The purpose of this document is to submit for COR3 and FEMA approval the Detailed Scope of Work (SOW) for project 738120 Distribution Pole and Conductor Repair – Carolina Group 2 – Phase 2 Project under DR-4339-PR Public Assistance. The document provides a detailed description of the project, including scope, schedule, and cost estimates, as well as Environmental and Historic Preservation ("EHP") requirements and proposed 406 hazard mitigation work. LUMA Energy is seeking approval from COR3 and FEMA for project funding to repair, restore, or replace the eligible facilities.

LUMA submits this Detailed SOW pursuant to the Transmission and Distribution Operations & Maintenance Agreement between Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and LUMA Energy, and in accordance with the Consent to Federal Funding Letter issued by PREPA and P3A and provided herein as Appendix F which collectively provides the necessary consent for LUMA Energy, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the T&D System submitted to FEMA.

Facilities

Facilities Description

These interconnected and inter-functional distribution feeders (sites) are part of the electrical distribution system in the Carolina Region. All the feeders originate from a substation (start) and serve customers along the route to various locations (end). The coordinates shown below as "GPS End" represent the end of the mainline backbone of each feeder.

Facilities List

The table below describes five distribution feeders that are being replaced as part of the project. The table identifies the GPS location of the line segments, the voltage level and gives an indication of the extent of work by identifying the number of poles to be replaced.

Name	Feeder Number	# Of Poles to Replace	GPS Start	GPS End	Phase	Voltage Level (kV)	Constructed Date
FAJARDO, SUB. 2005	2005-10	36	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
CANOVANAS PUEBLO, SUB. 2401	2401-01	286	[redacted]	[redacted]	1 Phase	8.32	More than 20 Years
RIO GRANDE, SUB. 2301	2301-02	118	[redacted]	[redacted]	1 Phase	8.32	More than 20 Years
PALMER, SUB. 2305	2305-02	59	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
LAS MERCEDES, SUB. 2403	2403-01	25	[redacted]	[redacted]	1 Phase	8.32	More than 20 Years

PROJECT SCOPE OF WORK

The project replaces poles and repairs conductors for certain feeders in Carolina for “Proposed 428 Public Assistance Scope of Work” and “Proposed 406 Hazard Mitigation Scope of Work.”, followed by descriptions of each work type specific to the Scope of Work for this group. The proposed restoration includes the repair of eligible disaster damage up to required codes and standards and the request to upgrade undamaged infrastructure to fully effectuate the restoration of disaster-damaged components and restore the function of the system to an approved industry standard. The Scope of Work consists of the removal and replacement of the following infrastructure to restore this facility to codes and standards:

Proposed 428 Public Assistance Scope of Work

Feeder 2005-10 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	4	45FT H6 CONCRETE POLE	4
35' WOOD	16	45FT H4 CONCRETE POLE	16
40' WOOD	16	45FT H4 CONCRETE POLE	16

Feeder 2301-02 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	2	45FT H4 CONCRETE POLE	2
30' WOOD	1	45FT H6 CONCRETE POLE	1
35' WOOD	1	45FT H3 CONCRETE POLE	1
35' WOOD	85	45FT H4 CONCRETE POLE	85
35' WOOD	1	45FT H6 CONCRETE POLE	1
35' WOOD	6	45FT S3 GALVANIZED POLE	6
40' WOOD	13	45FT H4 CONCRETE POLE	13
40' CONCRETE	4	45FT H4 CONCRETE POLE	4
45' WOOD	1	45FT H4 CONCRETE POLE	1
45' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	2	50FT H6 CONCRETE POLE	2
45' WOOD	1	50FT H6 CONCRETE POLE	1

Feeder 2305-02 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	1	45FT H4 CONCRETE POLE	1
30' WOOD	1	45FT H6 CONCRETE POLE	1

35' WOOD	9	45FT H4 CONCRETE POLE	9
35' WOOD	1	45FT H6 CONCRETE POLE	1
35' WOOD	1	45FT S3 GALVANIZED POLE	1
40' WOOD	34	45FT H4 CONCRETE POLE	34
40' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	1	45FT S3 GALVANIZED POLE	1
40' CONCRETE	3	45FT H4 CONCRETE POLE	3
45' WOOD	4	45FT H4 CONCRETE POLE	4
40' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	**1**	**50FT S8 GALV STEEL POLE**	**1**
45' WOOD	1	45FT H6 CONCRETE POLE	1

Feeder 2401-01 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	10	45FT H4 CONCRETE POLE	10
33' WOOD	1	45FT H4 CONCRETE POLE	1
35' WOOD	197	45FT H4 CONCRETE POLE	197
35' WOOD	6	45FT H6 CONCRETE POLE	6
35' WOOD	11	45FT S3 GALVANIZED POLE	11
40' WOOD	29	45FT H4 CONCRETE POLE	29
40' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	2	45FT S3 GALVANIZED POLE	2
40' STEEL	1	45FT H4 CONCRETE POLE	1
40' CONCRETE	2	45FT H4 CONCRETE POLE	2

40' CONCRETE	1	45FT S3 GALVANIZED POLE	1
45' WOOD	14	45FT H4 CONCRETE POLE	14
45' WOOD	2	45FT H6 CONCRETE POLE	2
45' WOOD	1	45FT S3 GALVANIZED POLE	1
50' WOOD	1	45FT H4 CONCRETE POLE	1
30' WOOD	1	50FT H4 CONCRETE POLE	1
35' WOOD	4	45FT H4 CONCRETE POLE	4
35' WOOD	2	45FT H6 CONCRETE POLE	2

Feeder 2403-01 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	13	45FT H4 CONCRETE POLE	13
35' WOOD	1	45FT H6 CONCRETE POLE	1
35' WOOD	1	50FT H6 CONCRETE POLE	1
35' CONCRETE	1	45FT H4 CONCRETE POLE	1
40' WOOD	1	45FT H4 CONCRETE POLE	1
40' CONCRETE	5	45FT H4 CONCRETE POLE	5
50' WOOD	1	45FT H4 CONCRETE POLE	1
35' WOOD	1	50FT H6 CONCRETE POLE	1
40' WOOD	1	45FT H6 CONCRETE POLE	1

Scope Notes

The work may include the following actions:

A. Pole Replacement

1. Remove existing poles, including hardware, and install new poles, including hardware, in the exact location. If the replacement is unable to be installed in the exact location, the pole will be installed within 3 ft.

2. All pole installations are to replace existing pole locations; no new locations are included in this scope of work. Refer to *Appendix J-EHP Checklis*t, column C (Soil area and depth impact) for the depths of the poles to be installed.

3. Remove the existing foundations as specified in *Appendix J- EHP Checklist* column I (Concrete Foundation) and replace them with new concrete foundation bases as per *Appendix D- Distribution Construction Standards (Concrete Base Standard)* The maximum auger width used is 42" and the maximum depth drilled is 15 ft.

4. New guy wire/ anchors are to be installed in compliance with *Appendix D- Distribution Construction Standards* within 3ft of the existing anchor. The maximum distance an anchor will be installed for a 50ft pole is 25ft from the base of the pole, within the right-of-way.

5. Brushing will be required in locations to gain access to the pole for replacement. Brushing refers to the removal and clearing of vegetation solely to the extent that it allows crews to conduct work. The brushing of vegetation will be limited to a 15 ft radius surrounding the surface of the pole but not to exceed the width of the right- of-way for the exclusive purpose of gaining access to the pole to conduct repairs. Please see *Appendix J- EHP Checklist* column H (Brushing/Clearing); refer to *Appendix B- Maps and Pictures* for pictures of the vegetation. The vegetation removal process will be managed according to applicable federal and state regulations.

6. All work for this program will be performed within the current electrical right-of-way.

7. This scope of work will not affect water or sewer utility services.

B. Material Disposal

1. PCBs, oil from the transformer and breakers, sealants, and other chemical wastes typical of a construction site are considered hazardous waste and will be disposed of by the contractor in approved facilities per applicable federal, state, and local regulations. Refer to *Appendix C - Waste Management Plan*

2. The type of debris that may be found in the process of removal are luminaires, polearms, photocells, metal scrap, wiring, concrete, steel, wood poles, etc. The debris will be separated and taken to an approved waste disposal facility in compliance with applicable federal, state, and local regulations. Refer to *Appendix C- Waste Management Plan* LUMA will provide actual disposal locations and quantities as a condition of the FEMA Record of Environmental Considerations.

3. Transformers will be contained and returned to LUMA in compliance with applicable federal, state, and local regulations. The removal of the transformer will require testing of the existing oil for PCB levels. The oil is to be drained and delivered to the approved waste disposal site as per environmental regulations. Refer to *Appendix C- Waste Management Plan*.

C. Access Roads

1. Poles are in close proximity to the roads and are site accessible with existing access points at the established locations. **The construction of access roads is not required for this scope of work.** Refer to *Appendix J- EHP Checklist* in column G "Site Accessible".

D. Staging Area

1. All materials are stored and dispatched from the Carolina Regional Warehouse. Refer to *Appendix L- Warehouse locations*. No additional or temporary staging areas are required.

E. Fill, gravel, sand, etc.

1. Fill, Gravel, and Sand materials will be obtained from an approved supplier as referenced in *Appendix A- Approved Supplier List* LUMA will retain and make available for review the documentation provided by material suppliers as a Condition of FEMA Record of Environmental Considerations.

F. List of Equipment to be used:

1. Skid Steer, Excavator, Dump trucks, Manlifts, 120-Ton Motor Crane, Boom Trucks 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine and Flatbed platform.

2. Vegetation will be removed utilizing machete, chainsaw, electric pruner, telescopic pole pruner, bucket truck, and/or chipper.

G. Endangered Species

After reviewing work sites against the US Fish and Wildlife Service Information for Planning and Consultation tool, the preliminary environmental report has identified endangered or threatened species that may be affected by the work to be performed. To avoid any potential impacts on these species, the project will follow the U.S. Fish and Wildlife Service monitoring requirements and conservation measures. Please refer to the column in Appendix J—EHP Checklist column W for the complete report per location.

H. Specific List of Permits Required:

1. DTOP Endorsements & Municipality Notifications.
2. Excavation and Demolition Notification in the Department of Transportation and Public Works Agency - (DTOP).

LUMA will provide proof of all permits.

PROJECT COST ESTIMATE (PCE)

The estimated costs (compliant with Class 3 Accuracy +/-30%) to complete the project are captured in the table(s) below. The cost estimate was developed utilizing preliminary Architectural and Engineering design information and may be subject to change. LUMA has allocated 10% of the project cost to mitigate potential known risks. For more details, refer to **Appendix H – Detailed Cost Estimate.**

COST ESTIMATE		
COST ELEMENT	**428**	
PLANNING		**$826**
MANAGEMENT		**$332**
Carolina Group 2 - Phase 2 ID: **14F018940000**		**$9,745**
CONTINGENCY		**$1,296**
COST TOTALS		**$12,200**
FAASt ALLOCATIONS	**FAASt Project # 738120 TOTAL**	**$11,041**
	FAASt A&E # 335168 TOTAL	**$1,159**

Work To Be Completed (WTBC): $12,200,382

A&E Deduction (Global A&E FAASt 335168): -$1,159,111

Project Total Cost: $11,041,271

Project Notes:

1. For detailed cost estimate, please refers to document labeled: 738120-DR4339PR-Appendix H-Detail Cost Estimate - Carolina Group 2 - Phase 2 Rev0.xlsx

2. Refer to detailed SOW provided in document 738120-DR4339PR-Detailed SOW Carolina Group 2 - Phase 2 Rev0.pdf

3. For reference documents Appendix A thru K, see file labeled:

   APPENDIX A - Approved Supplier List

   APPENDIX B - Maps and Pictures

APPENDIX C - Waste Management Plan

APPENDIX D - Distribution Construction Standards

APPENDIX E - LUMA Wildlife Avian and Historical Protection Procedure #335

APPENDIX F - Consent to Federal Funding Letter - FEMA/COR3

APPENDIX G - Structure Coordinates

APPENDIX H - Detail Cost Estimate

APPENDIX I - PAPPG Appendix J - Cost-Effective Hazard Mitigation Measures

APPENDIX J - EHP Checklist

APPENDIX K - EHP Maps

APPENDIX L - Warehouse Locations

4. For EHP Requirements, refer to pages 5 to 6 of the detailed SOW and reference documents: Appendix J & K.

5. Architectural and Engineering (A&E) costs are deducted given previously obligated Global A&E Project for the subject FAASt PREPA work (see project: 335168 - FAASt A&E PREPA).

406 HMP Scope

Project number: [738120] FAASt Distribution Pole and Conductor Repair Carolina Caguas Group 2 – Phase 2 (Distribution)

Damage # DI #454626; FAASt Distribution Pole and Conductor Repair – Carolina Group 2 Phase 2

Applicant: PR Electric Power Authority (000-UA2QU-00)

Location: Carolina, Puerto Rico

GPS Latitude/Longitude: [redacted]

Hazard Mitigation Narrative

During the incident period from September 17, 2017, to November 15, 2017, the Commonwealth of Puerto Rico experienced hurricane-force winds, heavy rain, flooding and power outage from Hurricane Maria. The incident caused damage to the electrical system, such as the power generation plants, transmission and distribution lines, substations, communication systems, buildings, among other damages to the infrastructures owned, operated, and maintained by the Puerto Rico Electric Power Authority (PREPA).

Project # Project # 738120 FAASt Distribution Pole and Conductor Repair –Carolina Group 2 – Phase 2.

The Distribution Pole and Conductor Repair – Carolina Group 2 – Phase 2 2 consists of 5 interconnected and inter-functional distribution feeders (sites) establish the electrical distribution system as follow: Carolina Group 2 . (FAJARDO, SUB.2005-10, CANOVANAS PUEBLO, SUB. 2401-01, RIO GRANDE, SUB. 2301-02, PALMER, SUB. 2305-02, LAS MERCEDES, SUB. 2403-01).

The Method of Repair (MOR) included the replacement of the damaged critical distribution poles (wood, concrete or galvanized), cross-arms, insulators, and all associated hardware needed for the new structure. According to the information provided by the Applicant, due to the high velocity hurricane winds, wind-blown debris, and prolonged heavy rain, were the main cause of the damages of the facilities.

In order to minimize the damages in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance to +160mph. Note: The FEMA Accelerated Award Strategy (FAASt) MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The +160mph wind tolerance mitigation measure, will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards.

Cost Summary:

The Hazard Mitigation Proposal is divided in 1ea Sub-Project: DI #454626; FAASt Distribution Pole and Conductor Repair – Carolina Group 2. The total HMP Cost is the HM Net Cost ($234,531.00) + Applicant A&E, Management & General Conditions ($175,368.81) = $409,899.81

Hazard Mitigation Proposal (HMP) Scope of Work:

In order to prevent or reduce future damages from similar events, the applicant proposed the following mitigation measures:

- **[Distribution Critical Poles Replacement] 406 Mitigation Scope of Work:**

1. Feeder 2005-10 Scope: 43 EA Pole
    - Replace Four (4) 45Ft H6 Concrete Pole Poles by Four (4) 45Ft S5.7 Galvanized Steel Poles. No 406 Hazard Mitigation work identified to replace (4) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Sixteen (16) 45Ft H4 Concrete Pole Poles by Sixteen (16) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Sixteen (16) 45Ft H4 Concrete Pole Poles by Sixteen (16) 45Ft S5.7 Galvanized Steel Poles.
2. Feeder 2301-02 Scope: 49 EA Poles
    - Replace Two (2) 45Ft H4 Concrete Poles by Two (2) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45 H3 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace Eighty-Five (85) 45Ft H4 Concrete Poles by Eighty-Five (85) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Six (6) 45Ft S3 Galvanized Poles by Six (6) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Thirteen (13) 45Ft H4 Concrete Poles by Thirteen (13) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Four (4) 45Ft H4 Concrete Poles by Four (4) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace () 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Two (2) 50Ft H6 Concrete Poles by Two (2) 50Ft S8 Galvanized Steel Poles.
    - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.
3. Feeder 2305-02 Scope: 59 EA Poles
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Nine (9) 45Ft H4 Concrete Poles by Nine (9) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S3 Galvanized Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace Thirty-Four (34) 45Ft H4 Concrete Poles by Thirty-Four (34) 45Ft S5.7 Galvanized Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S3 Galvanized Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace Three (3) 45Ft H4 Concrete Poles by Three (3) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Four (4) 45Ft H4 Concrete Poles by Four (4) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.
    - No 406 Hazard Mitigation work identified to replace (1) 40 ft Wood Pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
4. Feeder 2401-01 Scope: 43 EA Poles
    - Replace Ten (10) 45Ft H4 Concrete Poles by Ten (10) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
    - Replace One Hundred Ninety-Seven (197) 45Ft H4 Concrete Poles by One Hundred Ninety-Seven (197) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Six (6) 45Ft H6 Concrete Poles by Six (6) 45Ft S5.7 Galvanized Steel Poles. No 406 Hazard Mitigation work identified to replace (6) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Eleven (11) 45Ft S3 Galvanized Poles by Eleven (11) 45Ft S5.7 Galvanized Steel Poles.
    - Replace Twenty-Nine (29) 45Ft H4 Concrete Poles by Twenty-Nine (29) 45Ft S5.7 Galvanized Steel Poles.
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428

PA method of repair (MOR).

- Replace Two (2) 45Ft S3 Galvanized Poles by Two (2) 45Ft S5.7 Galvanized Steel Poles.
- Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
- Replace Two (2) 45Ft H4 Concrete Poles by Two (2) 45Ft S5.7 Galvanized Steel Poles.
- Replace One (1) 45Ft S3 Galvanized Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
- Replace Fourteen (14) 45Ft H4 Concrete Poles by Fourteen (14) 45Ft S5.7 Galvanized Steel Poles.
- Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galvanized Steel Poles. No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
- Replace One (1) 45Ft S3 Galvanized Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
- Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
- Replace One (1) 50 H4 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.
- Replace Four (4) 45Ft H4 Concrete Poles by Four (4) 50Ft S8 Galvanized Steel Poles.
- Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 50Ft S8 Galvanized Steel Poles.

5. Feeder 2403-01 Scope: 59 EA Poles
   - Replace Thirteen (13) 45Ft H4 Concrete Poles by Thirteen (13) 45Ft S5.7 Galvanized Steel Poles.
   - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole. No 406 Hazard Mitigation work identified to replace (1) 50' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
   - Replace Five (5) 45Ft H4 Concrete Poles by Five (5) 45Ft S5.7 Galvanized Steel Poles.
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galvanized Steel Pole.
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.
   - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galvanized Steel Pole.

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(III) Hazard Mitigation Proposal (HMP) Cost

Total Net Hazard Mitigation Cost (Base Cost) =	$ 234.531.00
+ HM (Applicant A&E, Management & General Conditions) =	$ 175,368.81
Hazard Mitigation Total Cost =	$ 409,899.81

HMP Cost-Effectiveness Calculations:

FEMA's Benefit-Cost Analysis (BCA), methodology evaluates expected risk reduction benefits of a hazard mitigation project and compares those benefits to the cost of the mitigation project. FEMA Public Assistance Program and Policy Guide (PAPPG) Chapter 2. Section VII. C. defines cost effective mitigation as: The Hazard Mitigation Measure is cost effective through an acceptable Benefit Cost Analysis (BCA) with a resulting Benefit Cost Ratio equal to or greater than (1).

The Island Wide Benefit Cost Analysis (IWBCA) created for the PREPA infrastructure defines a maximum potential benefit using the incurred costs of the PREPA FEMA Accelerated Award Strategy (FAASt) fixed cost estimate, the mission assignments utilized for the reconnection effort, and the costs associated with loss of service. This maximum benefit has been developed to fund all mitigation projects from both Public Assistance Hazard Mitigation and the Hazard Mitigation Grant program.

It is the applicant's responsibility to maintain a record of approved IWBCA related projects to avoid running out of funds for their Mitigation portion projects.". Please see attached IWBCA Package

The cost of the Hazard Mitigation Proposal (HMP) described herein is $409,899.81 (Hazard Mitigation Total Cost). The cost of this HMP combined will all other proposals (both PA and HMGP) does not exceed the maximum potential benefit and is therefore deemed cost effective per FEMA Public Assistance Program and Policy Guide (PAPPG) V3.1 April 2018, Chapter 2, VII., Section C, BCA Rule. This Hazard Mitigation Proposal meets eligible repair and restoration cost-effective requirements.

**See Mitigation Profile Documents Tab in Grants Manager for complete version of this HMP and supporting documents (HMP, HMP cost estimate, Supporting documents file).

Cost

Code	Quantity	Unit	Total Cost	Section
3510 (Engineering And Design Services)	1.00	Lump Sum	($1,159,111.00)	Uncompleted
9201 (PAAP Fixed Estimate (No Value - Tracking Purposes Only))	1.00	Lump Sum	$0.00	Completed
9001 (Contract)	1.00	Lump Sum	$12,200,382.00	Uncompleted

CRC Gross Cost	$11,041,271.00
Total 406 HMP Cost	$409,899.81
Total Insurance Reductions	$0.00
CRC Net Cost	$11,451,170.81
Federal Share (90.00%)	$10,306,053.73
Non-Federal Share (10.00%)	$1,145,117.08

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
0	Pending	In Review		$11,451,170.81	90%	$0.00	

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	11/25/2024	$10,306,053.73	90%	Accepted	4339DRPRP00118501

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- The Subrecipient provided the estimate for this PW. FEMA validated the estimate and found it to be reasonable for the work to be performed.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.

Insurance

Additional Information

7/5/2024

GENERAL INFORMATION

Event: DR4339-PR

Project: SP 738120

Category of Work: Cat F - Utilities

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Maria

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2017 to 11/15/2017

Total Public Assistance Amount: $11,451,170.81 (CRC Gross Cost $11,041,271.00 + Mitigation Amount $409,899.81)

COMMERCIAL INSURANCE INFORMATION

Does the applicant have a Commercial Policy that extends coverage for this facility: Yes

Policies Issued by: Willis Towers Watson, Multinational Insurance Company and Mapfre

Policy Numbers: Willis Towers Watson (B0804Q1966F17, B0804Q14312F17, B0804Q19673F17, B0804Q19672F17, B0804Q18529F17, B0804Q14312F17, B0804Q19674F17, B0804Q18411F17, B0804Q14310F17, B0804Q11038F17, B0804Q14507F17, B0804Q14312F17)

Mapfre Praico Insurance Company (1398178000644)

Multinational Insurance Company (88-CP-000307831-2, 88-CP-000318673-0, 88-CP000318674-0, 88-CP-000318675-0, 88-CP-000318676-0, 88-CP-000318677-0)

Policy Period: From: 5/15/2017 To: 5/15/2018

Policy Limits: $300,000,000.00

RCV or ACV: Replacement Cost Value

Deductible Amount $25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No

***NUMBER* OF DAMAGED LOCATIONS INCLUDED IN THIS PROJECT:** (1)

Damaged Inventory (DI) #454626:

FAASt [Pole and Conductor Repair - Carolina Group 2 - Phase 2] (FAJARDO, SUB.2005-10,CANOVANAS PUEBLO, SUB. 2401-01,RIO GRANDE,SUB. 2301-02,PALMER, SUB. 2305-02, LAS MERCEDES, SUB. 2403)

Location: Icacos Dam

GPS Coordinates: [redacted]

Cause of Loss: Wind / Wind Driven Rain

SOV / Schedule #: Not insured

SOV / Schedule Amount: Not insured

Applicable Deductible Amount: N/A

Damage Inventory Amount: $11,451,170.81 (CRC Gross Cost $11,041,271.00 + Mitigation Amount $409,899.81)

Prior Obtain and Maintain Requirement:

No prior insurance requirements were found for this facility.

Reduction(s):

No insurance reduction will be applied to this project as coverage is not anticipated. An anticipated insurance reduction of $193,746,436.00 was applied to FAAST project # 136271 for anticipated insurance proceeds for Hurricane Maria losses. For ease of reference, please see table of insurance allocations: "*PREPA Allocation Plan – All Disasters"* file.

Obtain and Maintain Requirement:

No Obtain & Maintain Requirement is being mandated for the FAASt [Pole and Conductor Repair - Carolina Group 2 - Phase 2] (FAJARDO, SUB.2005-10,CANOVANAS PUEBLO, SUB. 2401-01,RIO GRANDE,SUB. 2301-02,PALMER, SUB. 2305-02, LAS MERCEDES, SUB. 2403) because the facility does not meet the definition of building, equipment, contents, or vehicle.

Insurance Proceeds Statement:

FEMA acknowledges that the Applicant is in negotiations with their insurance carrier at the time of the FEMA insurance review and might have received partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy limits. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled on a case-by-case basis.

Standard Insurance Comments

FEMA Policy 206-086-1
PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)

A. Duplication of Benefits. FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery it is entitled to for that property.

2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.

3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from their insurer(s).

…

5. If an applicant has an insurance requirement from a previous event:

a. FEMA will reduce assistance by the actual or anticipated insurance proceeds, or the amount of insurance required in the previous disaster, whichever is greater.

b. FEMA will only consider insolvent insurers, legal fees, or apportionment of proceeds as described in Section VII, Part 2(A)(3) and (4) when the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster.

Jean-Carlo Echevarria, PA Insurance Specialist, CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders? **Yes**

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- a. The Subrecipient and/or Subrecipient's contractor shall follow the Low Impact Debris Removal Stipulations (LIDRS) as stated in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022. b. Unexpected Discoveries: Pursuant to Stipulation III.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm. c. Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out
- Amazona vittate (Puerto Rican parrot) for FEEDERs 2401-01 and 2301-02/ Endangered Species Act (ESA) 9. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. During breeding seasons (see below), nest surveys shall be conducted if a project occurs within the range of any of the species listed above and if habitat for those species will be impacted by the proposed actions. Nest searches must be conducted by qualified personnel with the appropriate permits from the Puerto Rico Department of Natural and Environmental Resources (PRDNER) prior to start of work. If nesting activity is detected, all construction activities or human disturbance must be avoided within a 50-meter buffer around any nest(s) found within the project area. This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Outside the breeding season no nest surveys are required, but if a nest is encountered, all construction activities or human disturbance must be avoided within a 50-meter buffer around that nest(s). This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Furthermore, if any of the species indicated above is observed (e.g., foraging, resting) within the project area, avoid any disturbance to the individual(s) and do not flush the bird until it leaves on its own. Nesting seasons: *. Puerto Rican parrot: February-June. For all nest sightings, the Applicant must record the time and date of the sighting and the specific location where it was found. All sightings and incidental lethal take reports should be sent to the USFWS Caribbean Ecological Services Field Office at Caribbean_es@fws.gov. For questions, the Point of Contact (POC) is José Cruz-Burgos, Endangered Species Program Coordinator, and can be contacted at: ¿ Mobile: 305-304-1386 ¿ Office phone: 786-244-0081 ¿ Office Direct Line: 939-320-3120 ¿ Email: jose_cruz-burgos@fws.gov

- Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Conditions *. The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities.
- Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Conditions *. Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.
- The Applicant must provide documentation at close-out that proves completion of required Conservation Measures
- Puerto Rican Boa (Chilabothrus inornatus) for FEEDERs 2005_10; 2301_02; 2305-02; 2401_01; 2403_01/ Endangered Species Act (ESA) 1. Inform all project personnel about the potential presence of the Puerto Rican (PR) boa and Virgin Islands (VI) boa in areas where the proposed work will be conducted and provide training on PR and VI boa identification. A pre-construction meeting will be conducted to inform all project personnel about the need to avoid harming these species. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973. An educational poster or sign with photo or illustration of these species will be displayed at the project site. 2. Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area and any area to be excluded and protected will be clearly marked in the project plan and in the field to avoid further habitat degradation outside of the footprint of the project. 3. Once areas are clearly marked, and right before the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), biologist or designated project personnel with experience on these species will survey the areas to be cleared to verify the presence of any PR or VI boa within the Action Area. If a PR or VI boa is found during the search, it should be captured and managed as per #6 below. Once the removal of vegetation begins, the biologist or designated personnel must remain at the work site and be ready to capture any boa that might be in harm's way as the result of the habitat disturbance (see #6). 4. For VI boas, once the Action Area has been searched, vegetation will be cut about one meter above ground prior to the use of heavy machinery for land clearing. Cutting vegetation by hand will allow VI boas present on site to move away on their own to adjacent available habitat. If there is no suitable habitat adjacent to theproject site, any VI boa found will berelocated accordingly (see #6). 5.For all boa sightings (dead or alive), record the time and date of the sighting and the specificlocation where it was found. Data will also include a photo of the animal(dead or alive),relocation site GPS coordinates, time and date ofthe relocation, and comments on how theanimal was detected and its behavior. 6.If any PR or VI boa (dead or alive) is found within the Action Areaand on harm's way, theaction will stop,and information will berecorded(see #5). Allattempts will be made toimmediately safely capture and relocate the animal within suitable habitat (forested)at least1kmfrom the Action Areaand away fromconstruction areas. PR boa relocation sites will bepre-determined before the project startsand sites shared with the Service for revision and concurrence. Relocation of PR boas will be conducted by trained, designated personnelensuring the animal is notharmedor injuredduring the capture and relocation process.
- Continuation of Conditions for Puerto Rican Boa (Chilabothrus inornatus) for FEEDERs 2005_10; 2301_02; 2305-02; 2401_01; 2403_01/ Endangered Species Act (ESA) 7.Measures will be taken to avoid and minimize PR boa and VI boa casualties by heavy machinery or motor vehicles being left in the Action Area. *.Any heavy machinery left on site (staging areas) or near potential PR or VIboa habitatwill be thoroughly inspected each morning beforework starts to ensure that no boashave sheltered within engine compartments or other areas of the heavy machinery. Ifa PR boa or VI boa is found within vehicles or heavy machinery, boaswill be safely captured accordingly. Ifnot possible, the animal will be left alone until it leaves thevehicle or machine by itself. *.The PR boa and VI boamay seek shelterwithin debrispiles. Measures should be taken to avoid and minimize boa casualtiesassociated with sheltering in new debris piles as aresult of projectactivities. New debris piles should be placed in areasas faras possible from forested areas. Prior to moving, disposing, or shredding, debris piles should becarefully inspected for the presence of PR boasand VI boas.If debris pileswill be lefton site, we recommend they be placed in an undisturbed area. *.In theevent a PR boaand VI boa is found dead within the projectarea, the FederalAgency and the Recipient must contact the Service to appropriately dispose the animal. *.If a PR boa or aVI boa is accidentally injured or killed during captureand relocation activities during the Action, the Federal Agency and theRecipient shall terminate theauthorized activities and contact the Service within 24 hourstoreinitiate consultation.The Federal Agencywill consult with theService to determine whether authorizedactivities should continue as proposed and whether modifications are warranted. *.Should the forms of takereach the amount of exempted take during the Action, theFederal Agency and the Recipient shall terminate the authorizedactivities and contactthe Service within 24 hourstoreinitiate consultation. TheFederal Agency will consultwith the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. For questionsand to submit reports, theService'sPoint of Contact (POC) is JoséCruz-Burgos, Endangered Species Coordinator, and can be contacted at:¿Mobile: 305-304-1386 ¿Office phone: 786-244-0081 ¿Office Direct Line: 939-320-3120 ¿Email: Caribbean_es@fws.gov or jose_cruz-burgos@fws.gov
- Executive Order 11988 - Floodplains Conditions for FEEDERs: 2301_02, 2305_02, 2401_01, 2403_01 and For Staging Area Carolina Regional Warehouse: Applicant must obtain any required permits from the Puerto Rico Permits Management Office (OGPe) prior to initiating work and comply with any conditions of the permit established by the Planning Board (JP) for constructions in floodplains. All coordination (emails, letters, documented phone calls) pertaining to these activities and compliance must be provided and maintained in the Applicant's permanent files.
- Uvillo (Eugenia haematocarpa) for FEEDER-2301_02 & FEEDER-2401_01 Endagered Species ACT (ESA) 1. Before initiating any work within the range of listed plant species and in areas with suitable habitat, applicants must conduct plant surveys. In the

event that listed species are discovered at the project site, the Service must be notified. The Applicant must develop conservation measures to minimize or avoid impacts on those species and share those measures with the Service for evaluation and approval. If no listed plants are found during surveys, no further action is required. However, if a listed plant species is found while the project is being conducted, project personnel shall stop work, and the Service should be contacted for further technical assistance. Service's point of contacts: *. José Cruz-Burgos, Endangered Species Program Coordinator, Mobile: 305-304-1386, Office: 786-244-0081, jose_cruz-burgos@fws.gov. *. Omar Monsegur, Fish and Wildlife Biologist, Mobile: (305) 304-0292, omar_monsegur@fws.gov.

- Resource Conservation and Recovery Act, aka Solid Waste Disposal Act (RCRA) Conditions If Transformers: The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements. *. Unusable equipment, debris, white goods, scrap metal any other material
- *** Previous condition for floodplains applies to 2301_02, 2305_02, 2401_01, 2403_01, but not to staging area***
- All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g., a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a Sub-recipient or their contractor beginning to borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at close-out and must include fill type (private, commercial, etc.), name, fill site GPS coordinates (not of the company/governmental office), address, and type of material.
- Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Pole and Conductor Repair-Carolina Group 2- Phase 2] (Distribution)**.

Final Reviews

Final Review

Reviewed By Amaro, Luis N. **Reviewed On** 11/01/2024 6:13 AM PST

Review Comments

LNA 11/01/24. This project has been reviewed, found eligible and cost reasonable, and it is ready to continue the award process.

Recipient Review

Reviewed By Salgado, Gabriel **Reviewed On** 11/05/2024 3:33 AM PST

Review Comments

Recipient review completed. Applicant must ensure to compliance with all regulatory requirements and PA policy. Project is ready for applicant review.

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of $11,451,170.81 for subaward number 11850 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Project Signatures

Signed By Miller, Thomas **Signed On** 11/06/2024

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Department of Homeland Security
Federal Emergency Management Agency

General Info

Project #	738670 **P/W #** 11712	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)	**Event**	4339DR-PR (4339DR)
Project Size	Large	**Declaration Date**	9/20/2017
Activity Completion Date	9/20/2027	**Incident Start Date**	9/17/2017
		Incident End Date	11/15/2017
Process Step	Obligated		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #1360108; FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)

DDD for this facility codified in the 136271 - MEPA078 Puerto Rico Electrical Power Authority Island Wide FAASt Project.

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)
- **Facility Description:** The specific facilities included in this project are: poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cable, underground cable systems, fault interrupting equipment (fuses, reclosers, and sectionalizes), and any other associated components.
- **Approx. Year Built:** 1980
- **GPS Latitude/Longitude:** [redacted]

General Damage Information:

- **Date Damaged:** 9/20/2017
- **Cause of Damage:** High winds & wind driven rain, caused by Cat 4 Hurricane Maria.

Final Scope

1360108 **FAASt [Distribution Pole and Conductor**

INTRODUCTION

The purpose of this document is to submit for approval the detailed Scope of Work ("SOW") to COR3 and FEMA for the Distribution Pole and Conductor Repair – Ponce Group 1 – Phase 2 Project under DR-4339- PR Public Assistance. The document provides a description of the project including scope, schedule, and cost estimates as well as

Environmental & Historical Preservation ("EHP") requirements and proposed 406 hazard mitigation work. LUMA Energy is seeking approval from COR3 and FEMA for project funding to repair, restore, or replace the eligible facilities.

LUMA submits this detailed SOW pursuant to the Transmission and Distribution Operations & Maintenance Agreement between Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and LUMA Energy, and in accordance with the Consent to Federal Funding Letter issued by PREPA and P3A and provided herein as Appendix F which collectively provides the necessary consent for LUMA Energy, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the Transmission and Distribution System submitted to FEMA.

FACILITIES

The facilities listed below are part of the feeder systems in the Ponce Region. These interconnected and inter-functional distribution feeders (sites) are part of the electrical distribution system. All the feeders originate from a substation (start) and serve customers along the route to various locations (end). The coordinates shown below as "GPS End" represent the end of the mainline backbone of each feeder.

Name	Feeder Number	# Of Poles to Replace	GPS Start	GPS End	Phase	Voltage Level (kV)	Constructed Date
CANAS, . SUB. 5018	5018-03	40	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
GUANICA, SUB. 5602	5602-02	29	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
LA RAMBLA, SUB. 5004	5004-07	68	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
GUAYANILLA, SUB. 5501	5501-04	26	[redacted]	[redacted]	1 Phase	4.16	More than 20 Years
LA RAMBLA, SUB. 5004	5004-06	33	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
LA RAMBLA, SUB. 5004	5004-09	21	[redacted]	[redacted]	1 Phase	13.2	More than 20 Years
YAUCO 2, SUB. 5303	5303-01	13	[redacted]	[redacted]	1 Phase	4.16	More than 20 Years

PROJECT SCOPE OF WORK

Below includes a breakdown of pole replacement by feeder for **"Proposed 428 Public Assistance Scope of Work"** and **"Proposed 406 Hazard Mitigation Grant Program Scope of Work",** followed by descriptions of each work type specific to the Scope of Work for this group.

Proposed 428 Public Assistance Scope of Work:

Feeder 5004-06 Scope:

Remove	Quantity	Install	Quanti
35' WOOD	18	45FT H4 CONCRETE POLE	18
35' WOOD	4	45FT H6 CONCRETE POLE	4
40' WOOD	6	45FT H4 CONCRETE POLE	6
40' WOOD	1	45FT H6 CONCRETE POLE	1
50' CONCRETE	1	45FT H4 CONCRETE POLE	1
35' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	2	45FT H6 CONCRETE POLE	2

Feeder 5004-07 Scope:

Remove	Quantity	Install	Quanti
35' WOOD	16	45FT H4 CONCRETE POLE	16
35' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	42	45FT H4 CONCRETE POLE	42
40' WOOD	4	45FT H6 CONCRETE POLE	4
40' CONCRETE	2	45FT H4 CONCRETE POLE	2
45' WOOD	2	45FT H4 CONCRETE POLE	2
45' CONCRETE	1	45FT H4 CONCRETE POLE	1

Feeder 5004-09 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	11	45FT H4 CONCRETE POLE	11
35' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	4	45FT H4 CONCRETE POLE	4
45' WOOD	3	45FT H4 CONCRETE POLE	3
35' WOOD	1	45FT H6 CONCRETE POLE	1
40' WOOD	1	45FT H6 CONCRETE POLE	1

Feeder 5018-03 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	11	45FT H4 CONCRETE POLE	11
35' WOOD	2	45FT H6 CONCRETE POLE	2
40' WOOD	24	45FT H4 CONCRETE POLE	24
40' WOOD	1	45FT S3 STEEL POLE	1
40' CONCRETE	2	45FT H4 CONCRETE POLE	2

Feeder 5303-01 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	7	45FT H4 CONCRETE POLE	7

35' WOOD	2	45FT H6 CONCRETE POLE	2
40' WOOD	2	45FT H4 CONCRETE POLE	2
40' WOOD	2	45FT H6 CONCRETE POLE	2

Feeder 5501-04 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	1	45FT H4 CONCRETE POLE	1
35' WOOD	16	45FT H4 CONCRETE POLE	16
35' WOOD	3	45FT S3 STEEL POLE	3
40' WOOD	3	45FT H4 CONCRETE POLE	3
35' WOOD	1	45FT H4 CONCRETE POLE	1
35' WOOD	1	50FT H6 CONCRETE POLE	1
40' WOOD	1	45FT H6 CONCRETE POLE	1

Feeder 5602-02 Scope:

Remove	Quantity	Install	Quantity
30' WOOD	1	45FT H4 CONCRETE POLE	1
35' WOOD	1	45FT H3 CONCRETE POLE	1
35' WOOD	11	45FT H4 CONCRETE POLE	11
35' WOOD	6	45FT H6 CONCRETE POLE	6
35' WOOD	1	45FT S3 STEEL POLE	1
40' WOOD	6	45FT H4 CONCRETE POLE	6
35' WOOD	1	50FT H6 CONCRETE POLE	1
40' WOOD	1	45FT H4 CONCRETE POLE	1
40' WOOD	1	50FT H6 CONCRETE POLE	1

Detail Descriptions for Planned Field Work:

Pole Replacement

- Remove existing poles, including hardware and install new poles, including hardware, in the same location. If unable to install the replacement in the same location, the pole will be installed within 3 feet.
- All pole installations are to replace existing pole locations; no new locations are included in this scope of work. Refer to *Appendix J- EHP Checklis*t, column C (Soil area and depth impact) for the depths of the poles to be installed.
- Remove the existing foundations as specified in *Appendix J- EHP Checklist* column I (Concrete Foundation) and replace them with a new concrete foundation bases as per *Appendix D- Distribution Construction Standards (Concrete Base Standard)*. The maximum auger width used is 42" and the maximum depth drilled is 15ft.
- New guy wire/ anchors are to be installed in compliance with *Appendix D- Distribution Construction Standards* within 3ft from the existing anchor. The maximum distance an anchor will be installed for a 50ft pole is 25ft from the base of the pole, within the right-of-way.
- Brushing will be required in locations to gain access to the pole for replacement. Brushing refers to the removal and clearing of vegetation solely to the extent that it allows crews to conduct work. The brushing of vegetation will be limited to a 15 ft radius surrounding the surface of the pole but not to exceed the width of the right-of-way for the exclusive purpose of gaining access to the pole to conduct repairs. Please see *Appendix J- EHP Checklist* column H (Brushing/Clearing), Refer to *Appendix B- Maps and Pictures* for pictures of the vegetation.

- All work for this program will be performed within the current electrical right-of-way.

- This scope of work will not affect water or sewer utility services.

Material Disposal

- PCBs, oil from the transformer and breakers, sealants, and other chemical wastes typical of a construction site are considered hazardous waste and will be disposed of by the contractor in approved facilities as per applicable local regulations. Refer to *Appendix C - Waste Management Plan*.

- The type of debris that may be found in the process of removal are luminaires, pole arms, photocells, metal scrap, wiring, concrete, steel, and wood poles, etc. The debris will be separated and taken to an approved waste disposal facility in compliance with applicable local regulations. Refer to *Appendix C- Waste Management Plan*.

- Transformers will be contained and returned to LUMA in compliance with applicable local

regulations. The removal of the transformer will require testing of the existing oil for PCB levels, drain oil, and delivery to the approved waste disposal site as per Environmental Regulations. Refer to *Appendix C- Waste Management Plan*.

Access Roads

- Poles are in close proximity to the roads and are site accessible. The construction of access roads is not required for this scope of work. Refer to *Appendix J- EHP Checklist* in column G "Site Accessible".

Staging Area

- All materials are stored and dispatched from the Ponce Regional Warehouse. Refer to *Appendix L- Warehouse locations*. No additional or temporary staging areas are required.

Fill, gravel, sand, etc.:

- Fill, Gravel, and Sand materials will be obtained from an approved supplier as referenced in *Appendix A- Approved Supplier List*.

List of Equipment to be used:

- Skid Steer, Excavator, Dump trucks, Manlifts, 120-Ton Motor Crane, Boom Trucks 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine and Flatbed platform.
- Vegetation will be removed utilizing machete, chainsaw, electric pruner, telescopic pole pruner, bucket truck, and/or chipper.

Specific List of Permits Required:

- DTOP Endorsements & Municipality Notifications.
- Excavation and Demolition Notification in Department of Transportation and Public Works Agency - (DTOP).
- LUMA will provide proof of all permits.

PROJECT ESTIMATE

The estimated costs (Class 3 Accuracy +/-30%) to complete the project are captured in the below table. The cost estimate was developed utilizing preliminary Architectural and Engineering design information and may be subject to change. LUMA has allocated 10% of project cost for the mitigation of potential known risks.

COST ESTIMATE	
Cost Element	**428**
PLANNING	$279,589.78
Permitting and Assessments	$19,506.26
Environmental Documentation & Management	$43,347.25

Engineering Services & Design		$216,736.27
MANAGEMENT		$160,384.84
Project Management		$34,677.80
Construction Management		$65,020.88
Contracting, Procurement & Contract Administration		$26,008.35
Projects Controls (Scheduling, Estimating, Support, Cost Control, Risk, Document Control & Reporting)		$26,008.35
Legal		$4,334.73
Finance & Accounting		$4,334.73
Ponce Group 1 - Phase 2 ID: 14F018990000		$4,352,289.00
material, labor, and equipment		$4,352,289.00
CONTINGENCY		$574,351.11
Contingency		$433,472.53
Escalation		$130,041.76
Overhead		$10,836.81
COST TOTALS		$5,366,614.73
DEDUCTIONS	**TOTAL INSURANCE PROCEEDS RECEIVED**	
FAASt ALLOCATIONS	**FAASt PROJECT # 738670 TOTAL**	**$4,926,640.11**
	FAASt A&E # 335168 TOTAL	**$439,974.62**

FEMA Project Cost Summary, 428 Version 0

Work to be Completed (WTBC): $5,366,614.73

A&E Deduction (Global A&E FAASt 335168): - $439,974.62

Project Total: $4,926,640.11

Project Notes

1. For detailed information, refer to documents/attachments labeled:

Scope of Work – *738670-DR4339PR-Detailed SOW Ponce Group 1 - Phase 2 Rev1.pdf*

Appendix A – Approved Supplier List

Appendix B – Maps and Pictures

Appendix C – Waste Management Plan

Appendix D – Distribution Construction Standards

Appendix E – LUMA Wildlife Avian and Historical Protection Procedure #335

Appendix F – Consent to Federal Funding Letter - FEMA/COR3

Appendix G – Structure Coordinates

Appendix H – Cost Estimate, *738670-DR4339PR-Appendix H-Detail Cost Estimate-Ponce Group 1-Phase 2 Rev1.xlsx*

Appendix I – PAPPG Appendix J - Cost-Effective Hazard Mitigation Measures

Appendix J – EHP Checklist

Appendix K – EHP Maps

Appendix L – Warehouse Locations

2. This project is part of Donor FAASt 136271 – MEPA078 Puerto Rico Electrical Power Authority (PREPA) Island Wide FAASt Project.

3. Architectural and Engineering (A&E) costs are deducted given previously obligated Global A&E Project for the subject FAASt PREPA work (see project: 335168 - FAASt A&E PREPA).

406 HMP Scope

Project number: [738670] FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution))

Damage #1360108; FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)

Applicant: PR Electric Power Authority (000-UA2QU-00)

Location: Ponce, Puerto Rico

GPS Latitude/Longitude: [redacted]

Hazard Mitigation Narrative

During the incident period from September 17, 2017, to November 15, 2017, the Commonwealth of Puerto Rico experienced hurricane-force winds, heavy rain, flooding, and power outage "loss of power" from Hurricane Maria. The incident caused damage to the electrical system, such as the power generation plants, transmission and distribution lines, substations, communication systems, buildings, among other damages to the infrastructures owned, operated, and maintained by the Puerto Rico Electric Power Authority (PREPA).

Project #738670 (Distribution Poles & Conductors Repair/Replacement).

The [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution) consists of 7 interconnected and inter-functional distribution feeders (sites) establish the electrical distribution system as follow: Canas-5018-03, Guanica-5602-02, La Rambla-5004-07, Guayanilla-5501-04, La Rambla- 5004-06, La Rambla-5004-09 and Yauco 2-5303-01.

The Method of Repair (MOR) included the replacement of the damaged critical distribution poles (wood, concrete or galvanized), cross-arms, insulators, and all associated hardware needed for the new structure. According to the information provided by the Applicant, due to the high velocity hurricane winds, wind-blown debris, and prolonged heavy rain, were the main cause of the damages of the facilities.

In order to minimize the damages in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance to +160mph. Note: The FEMA Accelerated Award Strategy (FAASt) MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The +160mph wind tolerance mitigation measure, will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards.

Hazard Mitigation Proposal (HMP) Scope of Work:

In order to prevent or reduce future damages from similar events, the applicant proposed the following mitigation measures:

Mitigation Measures *(Replacement)*

- To avoid damage in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance of all materials to +160mph. The FAASt MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The above mitigation measures will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards. Refer to Appendix J: Section VI.D.1 of the PAPPG V3.1.

- [Distribution Critical Poles Replacement] 406 Mitigation Scope of Work:

1. Feeder 5004-06 Scope: 33 EA. Poles

   - Replace twenty-five (25) 45Ft H4 Concrete Poles by twenty-five (25) 45Ft S5.7 Galv Steel Poles.
   - Replace one (1) 45Ft H6 Concrete Pole by one (1) 50Ft S8 Galv Steel Pole.
   - Replace two (2) 45Ft H6 Concrete Poles by two (2) 50Ft S8 Galv Steel Poles.
   - No 406 Hazard Mitigation work identified to replace Five (5) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Steel Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

2. Feeder 5004-07 Scope: 68 EA. Poles

- Replace Sixty-three (63) 45Ft H4 Concrete Poles by Sixty-three (63) 45Ft S5.7 Galv Steel Poles.
- Replace Four (4) 45Ft H6 Concrete Poles by Four (4) 45Ft S5.7 Galv Steel Poles.
- No 406 Hazard Mitigation work identified to replace one (1) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Stee Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

3. Feeder 5004-09 Scope: 21 EA. Poles

- Replace Eighteen (18) 45Ft H4 Concrete Pole Eighteen (18) 45Ft S5.7 Galv Steel Poles.
- Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 50Ft S8 Galv Steel Poles.
- No 406 Hazard Mitigation work identified to replace One (1) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Stee Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

4. Feeder 5018-03 Scope: 40 EA. Poles

- Replace Thirty-seven (37) 45Ft H4 Concrete Poles by Thirty-seven (37) 45Ft S5.7 Galv Steel Poles.
- Replace One (1) 45Ft S3 Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole.
- No 406 Hazard Mitigation work identified to replace Two (2) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Steel Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

5. Feeder 5303-01 Scope: 13EA Polese

- Replace Nine (9) 45Ft H4 Concrete Poles by Nine (9) 45Ft S5.7 Galv Steel Poles.
- No 406 Hazard Mitigation work identified to replace Four (4) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Steel Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

6. Feeder 5501-04 Scope: 26EA Poles

- Replace Twenty (20) 45Ft H4 Concrete Poles by Twenty (20) 45Ft S5.7 Galv Steel Poles.
- Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole.
- Replace Three (3) 45Ft S3 Steel Poles by Three (3) 45Ft S5.7 Galv Steel Poles.
- Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole.
- Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole

7. Feeder 5602-02 Scope: 29 EA Poles

- Replace Eighteen (18) 45Ft H4 Concrete Poles by Fifty- Eighteen (18) 45Ft S5.7 Galv Steel Pole.
- Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole.
- Replace One (1) 45Ft H3 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole.
- Replace Two (2) 50Ft H6 Concrete Poles by Two (2) 50Ft S8 Galv Steel Pole.
- Replace One (1) 45Ft S3 Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole.
- No 406 Hazard Mitigation work identified to replace six (6) 45Ft H6 Concrete Poles. Note: The 45Ft S5.7 Galv Steel Poles is cheaper than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).

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Hazard Mitigation Proposal (HMP) Cost:

Total Net Hazard Mitigation Cost (Base Cost) = $116,500.00

+ HM (Applicant A&E, Management & General Conditions) = $ 31,370.90

Hazard Mitigation Total Cost = **$147,870.90**

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HMP Cost-Effectiveness Calculations:

FEMA's Benefit-Cost Analysis (BCA), methodology evaluates expected risk reduction benefits of a hazard mitigation project and compares those benefits to the cost of the mitigation project. FEMA Public Assistance Program and Policy Guide (PAPPG) Chapter 2. Section VII. C. defines cost effective mitigation as: The Hazard Mitigation Measure is cost effective through an acceptable Benefit Cost Analysis (BCA) with a resulting Benefit Cost Ratio equal to or greater than (1).

The Island Wide Benefit Cost Analysis (IWBCA) created for the PREPA infrastructure defines a maximum potential benefit using the incurred costs of the PREPA FEMA Accelerated Award Strategy (FAASt) fixed cost estimate, the mission assignments utilized for the reconnection effort, and the costs associated with loss of service. This maximum benefit has been developed to fund all mitigation projects from both Public Assistance Hazard Mitigation and the Hazard Mitigation Grant program.

It is the applicant's responsibility to maintain a record of approved IWBCA related projects to avoid running out of funds for their Mitigation portion projects.". Please see attached IWBCA Package

The cost of the Hazard Mitigation Proposal (HMP) described herein is **$147,870.90** (Hazard Mitigation Total Cost). The cost of this HMP combined will all other proposals (both PA and HMGP) does not exceed the maximum potential benefit and is therefore deemed cost effective per FEMA Public Assistance Program and Policy Guide (PAPPG) V3.1 April 2018, Chapter 2, VII., Section C, BCA Rule. This Hazard Mitigation Proposal meets eligible repair and restoration cost-effective requirements.

**See Mitigation Profile Documents Tab in Grants Manager for complete version of this HMP and supporting documents (HMP, HMP cost estimate, Supporting documents file).

Cost

Code	Quantity	Unit	Total Cost	Section
3510 (v0 Engineering and Design Services, Deduction - PREPA FAASt Global A&E 335168)	1.00	Lump Sum	($439,974.62)	Uncompleted
9201 (PAAP Fixed Estimate (No Value - Tracking Purposes Only))	1.00	Lump Sum	$0.00	Completed
9001 (v0 Contract - PREPA FAASt Donor Project 136271)	1.00	Lump Sum	$5,366,614.73	Uncompleted

CRC Gross Cost	$4,926,640.11
Total 406 HMP Cost	$147,870.90
Total Insurance Reductions	$0.00
CRC Net Cost	$5,074,511.01
Federal Share (90.00%)	$4,567,059.91
Non-Federal Share (10.00%)	$507,451.10

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
0	Pending	In Review		$4,926,640.11	90%	$0.00	

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	11/25/2024	$4,567,059.91	90%	Accepted	4339DRPRP00117121

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.

Insurance

Additional Information

2/28/2024

GENERAL INFORMATION

Event: DR4339-PR

Project: SP 738670

Category of Work: Cat F - Utilities

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Maria

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2017 to 11/15/2017

Total Public Assistance Amount: $5,074,511.01 (CRC Gross Cost $4,926,640.11 + Mitigation Amount $147,870.90)

COMMERCIAL INSURANCE INFORMATION

Does the applicant have a Commercial Policy that extends coverage for this facility: Yes

Policies Issued by: Willis Towers Watson, Multinational Insurance Company and Mapfre

Policy Numbers: Willis Towers Watson (B0804Q1966F17, B0804Q14312F17, B0804Q19673F17, B0804Q19672F17, B0804Q18529F17, B0804Q14312F17, B0804Q19674F17, B0804Q18411F17, B0804Q14310F17, B0804Q11038F17, B0804Q14507F17, B0804Q14312F17)

Mapfre Praico Insurance Company (1398178000644)

Multinational Insurance Company (88-CP-000307831-2, 88-CP-000318673-0, 88-CP000318674-0, 88-CP-000318675-0, 88-CP-000318676-0, 88-CP-000318677-0)

Policy Period: From: 5/15/2017 To: 5/15/2018

Policy Limits: $300,000,000.00

RCV or ACV: Replacement Cost Value

Deductible Amount $25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No

***NUMBER* OF DAMAGED LOCATIONS INCLUDED IN THIS PROJECT:** (1)

Damaged Inventory (DI) #1360108:

FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)

Location: FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)

GPS Coordinates: [redacted]

Cause of Loss: Wind / Wind Driven Rain

Damage Inventory Amount: $5,074,511.01 (CRC Gross Cost $4,926,640.11 + Mitigation Amount $147,870.90)

Prior Obtain and Maintain Requirement:

No prior insurance requirements were found for this facility.

Reduction(s):

No insurance reduction will be applied to this project as coverage is not anticipated. An anticipated insurance reduction of $193,746,436.00 was applied to FAAST project # 136271 for anticipated insurance proceeds for Hurricane Maria losses. For ease of reference, please see table of insurance allocations: "*PREPA Allocation Plan – All Disasters"* file.

Obtain and Maintain Requirement:

No Obtain & Maintain Requirement is being mandated for the FAASt [Distribution Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution) because the facility does not meet the definition of building, equipment, contents, or vehicle.

Insurance Proceeds Statement:

FEMA acknowledges that the Applicant is in negotiations with their insurance carrier at the time of the FEMA insurance review and might have received partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy limits. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled on a case-by-case basis.

Standard Insurance Comments

FEMA Policy 206-086-1
PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)

A. Duplication of Benefits. FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery it is entitled to for that property.

2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.

3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from their insurer(s).

…

5. If an applicant has an insurance requirement from a previous event:

a. FEMA will reduce assistance by the actual or anticipated insurance proceeds, or the amount of insurance required in the previous disaster, whichever is greater.

b. FEMA will only consider insolvent insurers, legal fees, or apportionment of proceeds as described in Section VII, Part 2(A)(3) and (4) when the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster.

Jean-Carlo Echevarria, PA Insurance Specialist, CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders? **Yes**

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- A) The Subrecipient and/or Subrecipient's contractor shall follow the Low Impact Debris Removal Stipulations (LIDRS) as stated in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022. B) Unexpected Discoveries: Pursuant to Stipulation III.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm. C) Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out.
- Continue Condition for Endangered Species Act (ESA): Specie Chilabortus inornatus present at feeders CANAS SUB 5018-03, GUANICA SUB 5602-02, GUAYANILLA SUB 5501-04, LA RAMBLA, SUB. 5004-09, LA RAMBLA SUB 5004-06, LA RAMBLA SUB 5004-07 & YAUCO SUB 5303-01 5.For all boa sightings (dead or alive), record the time and date of the sighting and the specific location where it was found. Data will also include a photo of the animal (dead or alive), relocation site GPS coordinates, time and date of the relocation, and comments on how the animal was detected and its behavior. 6. If any PR or VI boa (dead or alive) is found within the Action Area and on harm's way, the action will stop, and information will be recorded (see #5). All attempts will be made to immediately safely capture and relocate the animal within suitable habitat (forested) at least 1km from the Action Area and away from construction areas. PR boa relocation sites will be pre-determined before the project starts and sites shared with the Service for revision and concurrence. Relocation of PR boas will be conducted by trained, designated personnel ensuring the animal is not harmed or injured during the capture and relocation process. 7. Measures will be taken to avoid and minimize PR boa and VI boa casualties by heavy machinery or motor vehicles being left in the Action Area. *. Any heavy machinery left on site (staging areas) or near potential PR or VI boa habitat will be thoroughly inspected each morning before work starts to ensure that no boas have sheltered within engine compartments or other areas of the heavy machinery. If a PR boa or VI boa is found within vehicles or heavy machinery, boas will be safely captured accordingly. If not possible, the animal will be left alone until it leaves the vehicle or machine by itself. *. The PR boa and VI boa may seek shelter within debris piles. Measures should be taken to avoid and minimize boa casualties associated with sheltering in new debris piles as a result of project activities. New debris piles should be placed in areas as far as possible from forested areas. Prior to moving, disposing, or shredding, debris piles should be carefully inspected for the presence of PR boas and VI boas. If debris piles will be left on site, we recommend they be placed in an undisturbed area. *. In the event a PR boa and VI boa is found dead within the project area, the Federal Agency and the Recipient must contact the Service to appropriately dispose the animal. *. If a PR boa or a VI boa is accidentally injured or killed during capture and relocation activities during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. *. Should the forms of take reach the amount of exempted take during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. For questions and

to submit reports, the Service's Point of Contact (POC) is José Cruz-Burgos, Endangered Species Coordinator, and can be contacted at: ¿ Mobile: 305-304-1386 ¿ Office phone: 786-244-0081 ¿ Office Direct Line: 939-320-3120 ¿Email: Caribbean_es@fws.gov or jose_cruz-burgos@fws.gov

- Conditions for RCRA: The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities. The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements. Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.
- Conditions for EO 11988: 1) Applicant must obtain any required permits from the Puerto Rico Permits Management Office (OGPe) prior to initiating work and comply with any conditions of the permit established by the Planning Board (JP) for constructions in floodplains. All coordination (emails, letters, documented phone calls) pertaining to these activities and compliance must be provided and maintained in the Applicant's permanent files.
- Condition for Endangered Species Act (ESA): Specie Chilabortus inornatus present at feeders CANAS SUB 5018-03, GUANICA SUB 5602-02, GUAYANILLA SUB 5501-04,LA RAMBLA, SUB. 5004-09, LA RAMBLA SUB 5004-06, LA RAMBLA SUB 5004-07 & YAUCO SUB 5303-01 1. Inform all project personnel about the potential presence of the Puerto Rican (PR) boa and Virgin Islands (VI) boa in areas where the proposed work will be conducted and provide training on PR and VI boa identification. A pre-construction meeting will be conducted to inform all project personnel about the need to avoid harming these species. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973. An educational poster or sign with photo or illustration of these species will be displayed at the project site. 2. Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area and any area to be excluded and protected will be clearly marked in the project plan and in the field to avoid further habitat degradation outside of the footprint of the project. 3. Once areas are clearly marked, and right before the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), biologist or designated project personnel with experience on these species will survey the areas to be cleared to verify the presence of any PR or VI boa within the Action Area. If a PR or VI boa is found during the search, it should be captured and managed as per #6 below. Once the removal of vegetation begins, the biologist or designated personnel must remain at the work site and be ready to capture any boa that might be in harm's way as the result of the habitat disturbance (see #6). 4. For VI boas, once the Action Area has been searched, vegetation will be cut about one meter above ground prior to the use of heavy machinery for land clearing. Cutting vegetation by hand will allow VI boas present on site to move away on their own to adjacent available Last update: December 2023 habitat. If there is no suitable habitat adjacent to the project site, any VI boa found will be relocated accordingly (see #6).
- Continue Condition for Endangered Species Act (ESA): Species Antrostomus noctitherus present at Feeders CANAS SUB 5018-03 & YAUCO SUB 5303-01 / Species Buteo platypterus brunnescens, Amazona vittata vittate, Accipiter striatus venator present at Feeders GUAYANILLA SUB 5501-04, LA RAMBLA 5004-06, RAMBLA SUB 5004-07 & YAUCO SUB 5303-01 8. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. During breeding seasons (Puerto Rican parrot: February-June/ Puerto Rican broad-winged hawk: December-June. Puerto Rican sharp-shinned hawk: December-June./ Antrostomus noctitherus: February-August.), nest surveys shall be conducted if a project occurs within the range of any of the species listed above and if habitat for those species will be impacted by the proposed actions. Nest searches must be conducted by qualified personnel with the appropriate permits from the Puerto Rico Department of Natural and Environmental Resources (PRDNER) prior to start of work. If nesting activity is detected, all construction activities or human disturbance must be avoided within a 50-meter buffer around any nest(s) found within the project area. This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. 10. Outside the breeding season no nest surveys are required, but if a nest is encountered, all construction activities or human disturbance must be avoided within a 50-meter buffer around that nest(s). This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Furthermore, if any of the species indicated above is observed (e.g., foraging, resting) within the project area, avoid any disturbance to the individual(s) and do not flush the bird until it leaves on its own. For all nest sightings, the Applicant must record the time and date of the sighting and the specific location where it was found. All sightings and incidental lethal take reports should be sent to the USFWS Caribbean Ecological Services Field Office at Caribbean_es@fws.gov. For questions, the Point of Contact (POC) is José Cruz-Burgos, Endangered Species Program Coordinator, and can be contacted at: ¿ Mobile: 305-304-1386 ¿ Office phone: 786-244-0081 ¿ Office Direct Line: 939-320-3120 ¿ Email: jose_cruz-burgos@fws.gov
- Continue Condition for Endangered Species Act (ESA): Species Cordia bellonis consultation present at Feeder YAUCO SUB 5303-01 10.Before initiating any work within the range of listed plant species and in areas with suitable habitat, applicants must

conduct plant surveys. In the event that listed species are discovered at the project site, the Service must be notified. The Applicant must develop conservation measures to minimize or avoid impacts on those species and share those measures with the Service for evaluation and approval. If no listed plants are found during surveys, no further action is required. However, if a listed plant species is found while the project is being conducted, project personnel shall stop work, and the Service should be contacted for further technical assistance. Service's point of contacts: *. José Cruz-Burgos, Endangered Species Program Coordinator, Mobile: 305-304-1386, Office: 786-244-0081, jose_cruz-burgos@fws.gov. *. Omar Monsegur, Fish and Wildlife Biologist, Mobile: (305) 304-0292, omar_monsegur@fws.gov.

- Condition for Endangered Species Act (ESA): Specie Atlantea tulita present at Feeders GUAYANILLA SUB 5501-04, LA RAMBLA SUB 5004-06, RAMBLA SUB 5004-07 & YAUCO SUB 5303-01 f. Once the Puerto Rican harlequin butterfly has moved away, within a period of 24 to 36 hours, a search of the prickly bush that has been buffered should be conducted to determine the presence of any eggs, caterpillars, or chrysalids of the butterfly on the plant. The contractor or the Applicant should send a report of the observation and its findings to caribbean_es@fws.gov after the 36-hour search is concluded. g. If, after the initial search or after the 24 to 36-hour search, any life stage of the Puerto Rican harlequin butterfly is found in the prickly bush, take the following actions: o Clearly mark the host plant with flagging tape. o Establish a 10-meter (32-foot) buffer zone around the bush for its protection. o Eggs are typically found on the prickly bush's newly grown, tender branches. Once the egg hatch, the caterpillar moves and feeds throughout the bush. Therefore, avoid cutting off the prickly bush within the project site even if no eggs, caterpillars, or chrysalids are present. o Work within the 10-meter buffered area may resume when no signs of any live life stage of the butterfly are detected, which usually takes approximately 60 to 120 days. h. For all Puerto Rican harlequin butterfly sightings (all life stages), the time and date of the sighting and the specific location where the butterfly was found must be recorded. Data should also include a photo of the butterfly (if possible) and the habitat where it was observed, site GPS coordinates, and comments on how the butterfly was detected and its behavior. All Puerto Rican harlequin butterfly sighting reports should be sent to the Service's Caribbean Ecological Service Field Office at caribbean_es@fws.gov. j. For questions regarding the Puerto Rican harlequin butterfly, the Point of Contacts are: o José Cruz-Burgos, Endangered Species Coordinator: ¿ Mobile: 305-304-1386 ¿ Office phone: 786-244-0081 ¿ Office Direct Line: 939-320-3120 ¿ Email: jose_cruz-burgos@fws.gov o Carlos Pacheco, Fish and Wildlife Biologist ¿ Mobile: 786-847-5951 ¿ Office Direct Line: 939-320-3113 ¿ Email: carlos_pacheco@fws.gov
- Condition for Endangered Species Act (ESA): Specie Atlantea tulita present at Feeders GUAYANILLA SUB 5501-04, LA RAMBLA SUB 5004-06, RAMBLA SUB 5004-07 & YAUCO SUB 5303-01 The Puerto Rican harlequin butterfly (Atlantea tulita) is endemic to Puerto Rico, occurring in the western portion of the island, in the northern karst region, and in the west-central volcanic-serpentine region. The following measures apply to the Puerto Rican harlequin butterfly through its current range: a. The contractor must inform all personnel about the potential presence of the Puerto Rican harlequin butterfly and its host plant, prickly bush (Oplonia spinosa), in the project areas. A pre-work meeting should inform all project personnel about the need to avoid harming this butterfly and its occupied host plant. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. Educational material (e.g., posters, flyers, or signs with photos or illustrations of all the life stages of the Puerto Rican harlequin butterfly (i.e., eggs, caterpillar, chrysalids, and adult, and its host plant) should be prepared and available to all personnel for reference. b. Before starting any project activity, including removal of vegetation and earth movement, the contractor must clearly delineate the boundaries of the working area in the field to avoid unnecessary habitat impacts. Once the project areas are clearly marked, and before any work activity, including site preparation, personnel with knowledge and ability to identify the Puerto Rican harlequin butterfly (all life stages) and the prickly bush must survey the areas where the work will be performed for the presence of the species and its host plant. It is important to note that the Puerto Rican harlequin butterfly can be observed year-round in all life stages; thus, oviposition (egg-laying) may occur at any time during the year. c. If the prickly bush is present on the project site, try to avoid cutting the plant, even if no eggs, caterpillars, or chrysalids are present. d. If there is no prickly bush within the project area, but the butterfly is observed flying within the project area, do not harass, harm, pursue, wound, kill, trap, capture, collect, or attempt to engage in any such conduct, the species. e. Adult butterflies are often observed flying near the host plant as part of their mating behavior and for laying eggs. Project-related activities must stop if the prickle bush is found in the project area and the Puerto Rican harlequin butterfly is observed flying in that same area. A temporary 50-meter (164 feet) buffer zone of no activity or human disturbance should be established and clearly marked around that prickly bush until the butterfly moves out on its own.
- Endangered Species Act (ESA) - The Applicant must provide documentation at close-out that proves completion of required Conservation Measures.
- The Applicant shall ensure best management practices are implemented to prevent erosion and sedimentation to surrounding, nearby or adjacent wetlands. To ensure that wetlands are not adversely impacted, per the Clean Water Act and Executive Order 11990, equipment storage and staging of construction materials and machinery must be in a location that would prevent erosion and sedimentation
- Conditions for NEPA: 1) "Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out" 2) All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g., a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a Sub-recipient or their contractor beginning

borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at close-out and must include fill type (private, commercial, etc.), name, fill site GPS coordinates (not of the company/governmental office), address, and type of material.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Pole and Conductor Repair - Ponce Group 1 - Phase 2] (Distribution)**.

Final Reviews

Final Review

Reviewed By Amaro, Luis N. **Reviewed On** 10/29/2024 6:04 AM PST

Review Comments

LNA 10/29/24. This project has been reviewed, found eligible and cost reasonable, and it is ready to continue the award process.

Recipient Review

Reviewed By Salgado, Gabriel **Reviewed On** 10/31/2024 6:16 AM PST

Review Comments

Recipient review completed. Applicant must ensure to compliance with all regulatory requirements and PA policy. Project is ready for applicant review.

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of $5,074,511.01 for subaward number 11712 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Project Signatures

Signed By Miller, Thomas **Signed On** 10/31/2024

Department of Homeland Security
Federal Emergency Management Agency

General Info

Project #	738672 **P/W #** 11686	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Pole and Conductor Repair - Mayaguez Group 1 - Phase 2] (Distribution)	**Event**	4339DR-PR (4339DR)
Project Size	Large	**Declaration Date**	9/20/2017
Activity Completion Date	9/20/2027	**Incident Start Date**	9/17/2017
Process Step	Obligated	**Incident End Date**	11/15/2017

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #661509; FAASt [Distribution Pole and Conductor Repair - Mayaguez Group 1 - Phase 2]

DDD for this facility codified in the 136271 - MEPA078 Puerto Rico Electrical Power Authority Island Wide FAASt Project.

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Distribution Pole and Conductor Repair - Mayaguez Group 1 - Phase 2
- **Facility Description:** The specific facilities included in this project are: poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cable, underground cable systems, fault interrupting equipment (fuses, reclosers, and sectionalizes), and any other associated components.
- **Approx. Year Built:** 1980
- **Start GPS Latitude/Longitude:** [redacted]
- **End GPS Latitude/Longitude:** [redacted]

General Damage Information:

- **Date Damaged:** 9/20/2017
- **Cause of Damage:** High winds & wind driven rain, caused by Cat 4 Hurricane Maria

Final Scope

661509 **FAASt [Distribution Pole and Conductor**

INTRODUCTION

The purpose of this document is to submit for approval the detailed Scope of Work ("SOW") to COR3 and FEMA for the Distribution Pole and Conductor Repair – Mayagüez Group 1 – Phase 2 Project under DR- 4339-PR Public Assistance. The document provides a description of the project including scope, schedule, and cost estimates as well as Environmental & Historical Preservation ("EHP") requirements and proposed 406 hazard mitigation work. LUMA Energy is seeking approval from COR3 and FEMA for project funding to repair, restore, or replace the eligible facilities.

LUMA submits this detailed SOW pursuant to the Transmission and Distribution Operations & Maintenance Agreement between Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and LUMA Energy, and in accordance with the Consent to Federal Funding Letter issued by PREPA and P3A and provided herein as Appendix F which collectively provides the necessary consent for LUMA Energy, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the Transmission and Distribution System submitted to FEMA.

FACILITIES

The facilities listed below are part of the feeder systems in the Mayagüez Region. These interconnected and inter-functional distribution feeders (sites) are part of the electrical distribution system. All the feeders originate from a substation (start) and serve customers along the route to various locations (end). The coordinates shown below as "GPS End" represent the end of the mainline backbone of each feeder.

Name	Feeder Number	# Of Poles to Replace	GPS Start	GPS End	Phase	Voltage Level (kV)	Constructed Date
ONCE DE AGOSTO, SUB. 6014	6014-02	159	[redacted]	[redacted]	1 Phase	13.2	More than 20 Y
RINCON, SUB. 7301	7301-03	37	[redacted]	[redacted]	1 Phase	4.16	More than 20 Y
ATALAYA, SUB. 7303	7303-01	38	[redacted]	[redacted]	1 Phase	4.16	More than 20 Y
T-BONE, SUB. 7011	7011-03	104	[redacted]	[redacted]	1 Phase	13.2	More than 20 Y
MOCA 2, SUB. 7104	7104-05	43	[redacted]	[redacted]	1 Phase	4.16	More than 20 Y
VICTORIA, SUB. 7008	7008-05	53	[redacted]	[redacted]	1 Phase	13.2	More than 20 Y
ALTURAS DE MAYAGUEZ, SUB. 6012	6012-02	23	[redacted]	[redacted]	1 Phase	13.2	More than 20 Y
AGUADA, SUB. 7201	7201-02	29	[redacted]	[redacted]	1 Phase	4.16	More than 20 Y

Project Scope of Work

Below includes a breakdown of pole replacement by feeder for **"Proposed 428 Public Assistance Scope of Work"** and **"Proposed 406 Hazard Mitigation Grant Program Scope of Work",** followed by descriptions of each work type specific to the Scope of Work for this group.

Proposed 428 Public Assistance Scope of Work:

Feeder 6012-02 Scope:

Remove	Quantity	Install	Quantity
30' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	16	45FT H4 CONCRETE	16
35' WOOD POLE	2	45FT H6 CONCRETE	2
35' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1
40' WOOD POLE	3	45FT H4 CONCRETE	3

Feeder 6014-02 Scope:

Remove	Quantity	Install	Quantity
30' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	2	45FT H3 CONCRETE	2
35' WOOD POLE	76	45FT H4 CONCRETE	76
35' WOOD POLE	3	45FT H6 CONCRETE	3

35' WOOD POLE	6	45FT S3 GALVANIZED STEEL	6
40' WOOD POLE	52	45FT H4 CONCRETE	52
40' WOOD POLE	2	45FT H6 CONCRETE	2
40' WOOD POLE	4	45FT S3 GALVANIZED STEEL	4
40' STEEL POLE	4	45FT H4 CONCRETE	4
45' WOOD POLE	7	45FT H4 CONCRETE	7
45' WOOD POLE	1	45FT H6 CONCRETE	1
45' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1

Feeder 7008-05 Scope:

Remove	Quantity	Install	Quantity
30' WOOD POLE	3	45FT H4 CONCRETE	3
30' WOOD POLE	1	45FT H6 CONCRETE	1
35' WOOD POLE	36	45FT H4 CONCRETE	36
35' WOOD POLE	4	45FT H6 CONCRETE	4
35' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1
40' WOOD POLE	4	45FT H4 CONCRETE	4
40' WOOD POLE	1	45FT H6 CONCRETE	1
35' WOOD POLE	2	45FT H6 CONCRETE	2
40' STEEL POLE	1	50FT H6 CONCRETE	1

Feeder 7011-03 Scope:

Remove	Quantity	Install	Quantity
30' WOOD POLE	8	45FT H4 CONCRETE	8
30' WOOD POLE	1	45FT H6 CONCRETE	1
30' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1
30' WOOD POLE	1	45FT H6 CONCRETE	1
35' WOOD POLE	45	45FT H4 CONCRETE	45
35' WOOD POLE	6	45FT H6 CONCRETE	6
35' WOOD POLE	1	45FT H6 CONCRETE	1
35' CONCRETE POLE	2	45FT H4 CONCRETE	2
40' WOOD POLE	26	45FT H4 CONCRETE	26
40' WOOD POLE	2	45FT H6 CONCRETE	2
40' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1
40' CONCRETE POLE	7	45FT H4 CONCRETE	7
40' CONCRETE POLE	1	45FT H6 CONCRETE	1
45' CONCRETE POLE	1	45FT H4 CONCRETE	1
45' CONCRETE POLE	1	45FT H4 CONCRETE	1

Feeder 7104-05 Scope:

Remove	Quantity	Install	Quantity
35' WOOD POLE	1	45FT H3 CONCRETE	1
35' WOOD POLE	25	45FT H4 CONCRETE	25
35' WOOD POLE	2	45FT H6 CONCRETE	2
40' WOOD POLE	8	45FT H4 CONCRETE	8
40' WOOD POLE	1	45FT H6 CONCRETE	1
40' WOOD POLE	1	45FT S5.7 GALVANIZED STEEL	1
45' WOOD POLE	1	45FT H4 CONCRETE	1
40' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	2	45FT H6 CONCRETE	2
40' WOOD	**1**	**50FT S8 GALV STEEL**	**1**

Feeder 7201-02 Scope:

Remove	Quantity	Install	Quantity
35' WOOD POLE	5	45FT H4 CONCRETE	5
35' WOOD POLE	5	45FT S3 GALVANIZED STEEL	5
40' WOOD POLE	11	45FT H4 CONCRETE	11
40' WOOD POLE	2	45FT H6 CONCRETE	2
40' WOOD POLE	2	45FT S3 GALVANIZED STEEL	2
40' CONCRETE POLE	2	45FT H4 CONCRETE	2
40' CONCRETE POLE	1	45FT H6 CONCRETE	1
40' WOOD POLE	1	50FT H4 CONCRETE	1

Feeder 7301-03 Scope:

Remove	Quantity	Install	Quantity
35' WOOD POLE	1	45FT H3 CONCRETE	1
35' WOOD POLE	16	45FT H4 CONCRETE	16
35' WOOD POLE	1	45FT H6 CONCRETE	1
35' WOOD POLE	3	45FT S3 GALVANIZED STEEL	3
40' WOOD POLE	10	45FT H4 CONCRETE	10
40' WOOD POLE	2	45FT H6 CONCRETE	2
35' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	1	50FT H4 CONCRETE	1
35' WOOD POLE	1	50FT H6 CONCRETE	1

Feeder 7303-01 Scope:

Remove	Quantity	Install	Quantity
30' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	18	45FT H4 CONCRETE	18
35' WOOD POLE	3	45FT S3 GALVANIZED STEEL	3
40' WOOD POLE	9	45FT H4 CONCRETE	9
40' WOOD POLE	1	45FT S3 GALVANIZED STEEL	1
35' WOOD POLE	1	45FT H4 CONCRETE	1
35' WOOD POLE	1	50FT H6 CONCRETE	1
40' WOOD POLE	2	45FT H4 CONCRETE	2
40' WOOD POLE	1	45FT H6 CONCRETE	1
40' WOOD POLE	1	50FT H6 CONCRETE	1
45' WOOD POLE	1	50FT H6 CONCRETE	1

Detail Descriptions for Planned Field Work:

Pole Replacement

- Remove existing poles, including hardware and install new poles, including hardware, in the same location. If unable to install the replacement in the same location, the pole will be installed within 3 feet.

- All pole installations are to replace existing pole locations; no new locations are included in this scope of work. Refer to *Appendix J- EHP Checklis*t, column C (Soil area and depth impact) for the depths of the poles to be installed.

- Remove the existing foundations as specified in *Appendix J- EHP Checklist* column I (Concrete Foundation) and replace them with a new concrete foundation bases as per *Appendix D- Distribution Construction Standards (Concrete Base Standard)*. The maximum auger width used is 42" and the maximum depth drilled is 15ft.

- New guy wire/ anchors are to be installed in compliance with *Appendix D- Distribution Construction Standards* within 3ft from the existing anchor. The maximum distance an anchor will be installed for a 50ft pole is 25ft from the base of the pole, within the right-of-way.

- Brushing will be required in locations to gain access to the pole for replacement. Brushing refers to the removal and clearing of vegetation solely to the extent that it allows crews to conduct work. The brushing of vegetation will be limited to a 15 ft radius surrounding the surface of the pole but not to exceed the width of the right-of-way for the exclusive purpose of gaining access to the pole to conduct repairs. Please see *Appendix J- EHP Checklist* column

H (Brushing/Clearing), Refer to *Appendix B- Maps and Pictures* for pictures of the vegetation.

- All work for this program will be performed within the current electrical right-of-way.
- This scope of work will not affect water or sewer utility services.

Material Disposal

- PCBs, oil from the transformer and breakers, sealants, and other chemical wastes typical of a construction site are considered hazardous waste and will be disposed of by the contractor in approved facilities as per applicable local regulations. Refer to *Appendix C - Waste Management Plan*.
- The type of debris that may be found in the process of removal are luminaires, pole arms, photocells, metal scrap, wiring, concrete, steel, and wood poles, etc. The debris will be separated and taken to an approved waste disposal facility in compliance with applicable local regulations. Refer to *Appendix C- Waste Management Plan*.
- Transformers will be contained and returned to LUMA in compliance with applicable local regulations. The removal of the transformer will require testing of the existing oil for PCB levels, drain oil, and delivery to the approved waste disposal site as per Environmental Regulations. Refer to *Appendix C- Waste Management Plan*.

Access Roads

- Poles are in close proximity to the roads and are site accessible. The construction of access roads is not required for this scope of work. Refer to *Appendix J- EHP Checklist* in column G "Site Accessible".

Staging Area

- All materials are stored and dispatched from the Mayagüez Regional Warehouse. Refer to.*Appendix L- Warehouse locations*. No additional or temporary staging areas are required.

Fill, gravel, sand, etc.:

- Fill, Gravel, and Sand materials will be obtained from an approved supplier as referenced in.*Appendix A- Approved Supplier List*.

List of Equipment to be used:

- Skid Steer, Excavator, Dump trucks, Manlifts, 120-Ton Motor Crane, Boom Trucks 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine and Flatbed platform.
- Vegetation will be removed utilizing machete, chainsaw, electric pruner, telescopic pole pruner, bucket truck, and/or chipper.

Specific List of Permits Required:

- DTOP Endorsements & Municipality Notifications.
- Excavation and Demolition Notification in Department of Transportation and Public Works Agency - (DTOP).
- LUMA will provide proof of all permits.

Project Estimate

The estimated costs (Class 3 Accuracy +/-30%) to complete the project are captured in the table below. The cost estimate was developed utilizing preliminary Architectural and Engineering design information and may be subject to change. LUMA has allocated 10% of the project cost for the mitigation of potential known risks.

COST ESTIMATE		
Cost Element	**428**	
PLANNING		**$**
Permitting and Assessments		$
Environmental Documentation & Management		$
Engineering Services & Design		$
MANAGEMENT		**$**
Project Management		$
Construction Management		$
Contracting, Procurement & Contract Administration		$

Projects Controls (Scheduling, Estimating, Support, Cost Control, Risk, Document Control & Reporting)		$	
Legal		$	
Finance & Accounting		$	
Mayaguez Group 1 - Phase 2 ID: 14F018870000		**$**	**9**
material, labor and equipment		$	9
CONTINGENCY		**$**	**1**
Contingency		$	
Escalation		$	
Overhead		$	
COST TOTALS		**$**	**11**
FAASt ALLOCATIONS	**FAASt PROJECT # 738672 TOTAL**	**$ 10,313,627**	
	FAASt A&E # 335168 TOTAL	**$ 834,793**	

Work To Be Completed (WTBC): $11,148,420

A&E Deduction (Global A&E FAASt 335168) -$834,793

Project Total Cost: $10,313,627

For a detailed cost estimate, please refer to document labeled: 738672-DR4339PR-Appendix H - Detail Cost Estimate - Mayaguez Group 1 - Phase 2 Rev.1.xlsx

Project Notes

1. Refer to detailed SOW provided in document 738672-DR4339PR-Detailed SOW Mayaguez Group 1 - Phase 2 Rev1.pdf
2. For reference documents Appendix A thru L, see file labeled:

   APPENDIX A - Approved Supplier List

   APPENDIX B - Maps and Pictures

   APPENDIX C - Waste Management Plan

   APPENDIX D - Distribution Construction Standards

   APPENDIX E - LUMA Wildlife Avian and Historical Protection Procedure #335

   APPENDIX F - Consent to Federal Funding Letter - FEMA/COR3

   APPENDIX G - Structure Coordinates

   APPENDIX H - Detail Cost Estimate

   APPENDIX I - PAPPG Appendix J - Cost-Effective Hazard Mitigation Measures

   APPENDIX J - EHP Checklist

   APPENDIX K - EHP Maps

   APPENDIX L - Warehouse Locations

3. This recipient project is part of FAASt Donor 136271 – MEPA078 Puerto Rico Electrical Power Authority (PREPA) Island Wide FAASt Project.
4. Architectural and Engineering (A&E) costs are deducted given previously obligated FAASt Global A&E 335168 for the subject project.

406 HMP Scope

Project number: 738672; FAASt [Distribution Pole and Conductor Repair – Mayaguez Group 1] (Distribution)

Damage #661509; FAASt [Pole and Conductor Repair – Mayaguez Group 1 – Phase 2 consists of 8 interconnected and inter-functional distribution feeders (sites) establish the electrical distribution system as follow: Once De Agosto, Sub. 6014 - 6014-02 Rincon, Sub. 7301 - 7301-03 Atalaya, Sub. 7303 - 7303-01 T-Bone, Sub. 7011 - 7011-03 Moca 2, Sub. 7104 - 7104-05 Victoria, Sub. 7008 - 7008-05 Alturas De Mayaguez, Sub. 6012 - 6012-02 Aguada, Sub. 7201 - 7201-02.

Applicant: PR Electric Power Authority (000-UA2QU-00)

Location: Mayaguez, Puerto Rico

Start GPS Latitude/Longitude: [redacted]

End GPS Latitude/Longitude: [redacted]

Hazard Mitigation Narrative

During the incident period from September 17, 2017, to November 15, 2017, the Commonwealth of Puerto Rico experienced hurricane-force winds, heavy rain, flooding, and power outage "loss of power" from Hurricane Maria. The incident caused damage to the electrical system, such as the power generation plants, transmission and distribution lines, substations, communication systems, buildings, among other damages to the infrastructures owned, operated, and maintained by the Puerto Rico Electric Power Authority (PREPA).

Project #738672 (Distribution Critical Poles & Conductors Repair/Replacement).

The Distribution Pole and Conductor Repair – Mayaguez Group 1 – Phase 2 consists of 8 interconnected and inter-functional distribution feeders (sites) establish the electrical distribution system as follow: Once De Agosto, Sub. 6014 - 6014-02 Rincon, Sub. 7301 - 7301-03 Atalaya, Sub. 7303 - 7303-01 T-Bone, Sub. 7011 - 7011-03 Moca 2, Sub. 7104 - 7104-05 Victoria, Sub. 7008 - 7008-05 Alturas De Mayaguez, Sub. 6012 - 6012-02 Aguada, Sub. 7201 - 7201-02.

The Method of Repair (MOR) included the replacement of the damaged critical distribution poles (wood, concrete or galvanized), cross-arms, insulators, and all associated hardware needed for the new structure. According to the information provided by the Applicant, due to the high velocity hurricane winds, wind-blown debris, and prolonged heavy rain, were the main cause of the damages of the facilities.

In order to minimize the damages in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance to +160mph. Note: The FEMA Accelerated Award Strategy (FAASt) MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The +160mph wind tolerance mitigation measure, will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards.

Hazard Mitigation Proposal (HMP) Scope of Work:

In order to prevent or reduce future damages from similar events, the applicant proposed the following mitigation measures:

Mitigation Measures *(Replacement)*

- To avoid damage in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance of all materials to +160mph. The FAASt MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The above mitigation measures will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards. Refer to Appendix J: Section VI.D.1 of the PAPPG V3.1.

- [Distribution Critical Poles Replacement] 406 Mitigation Scope of Work:

1. Feeder 6012-02 Scope: 23 EA Pole
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace Sixteen (16) 45Ft H4 Concrete Poles by Sixteen (16) 45Ft S5.7 Galv Steel Poles
   - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
     - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace Three (3) 45Ft H4 Concrete Poles by Three (3) 45Ft S5.7 Galv Steel Poles
2. Feeder 6014-02 Scope: 162 EA Poles
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace Two (2) 45Ft H3 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
   - Replace Seventy-Six (76) 45Ft H4 Concrete Poles by Seventy-Six (76) 45Ft S5.7 Galv Steel Poles
   - Replace Three (3) 45Ft H6 Concrete Poles by Three (3) 45Ft S5.7 Galv Steel Poles
     - No 406 Hazard Mitigation work identified to replace (3) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace Six (6) 45Ft S3 Galvanized Steel Poles by Six (6) 45Ft S5.7 Galv Steel Poles

- Replace Fifty-Two (52) 45Ft H4 Concrete Poles by Fifty-Two (52) 45Ft S5.7 Galv Steel Poles
- Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
    - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
- Replace Four (4) 45Ft S3 Galvanized Steel Poles by Four (4) 45Ft S5.7 Galv Steel Poles
- Replace Four (4) 45Ft H4 Concrete Poles by Four (4) 45Ft S5.7 Galv Steel Poles
- Replace Seven (7) 45Ft H4 Concrete Poles by Seven (7) 45Ft S5.7 Galv Steel Poles
- Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
- Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole

3. Feeder 7008-05 Scope: 3 EA Poles
    - Replace Three (3) 45Ft H4 Concrete Poles by Three (3) 45Ft S5.7 Galv Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
        - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Thirty-Six (36) 45Ft H4 Concrete Poles by Thirty-Six (36) 45Ft S5.7 Galv Steel Poles
    - Replace Four (4) 45Ft H6 Concrete Poles by Four (4) 45Ft S5.7 Galv Steel Poles
        - No 406 Hazard Mitigation work identified to replace () 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace Four (4) 45Ft H4 Concrete Poles by Four (4) 45Ft S5.7 Galv Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
        - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 50Ft S8 Galv Steel Poles
    - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
4. Feeder 7011-03 Scope: 104 EA Poles
    - Replace Eight (8) 45Ft H4 Concrete Poles by Eight (8) 45Ft S5.7 Galv Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
        - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
    - Replace Forty-Five (45) 45Ft H4 Concrete Poles by Forty-Five (45) 45Ft S5.7 Galv Steel Poles
    - Replace Six (6) 45Ft H6 Concrete Poles by Six (6) 45Ft S5.7 Galv Steel Poles
        - No 406 Hazard Mitigation work identified to replace (6) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
    - Replace Two (2) 45Ft H4 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
    - Replace Twenty-Six (26) 45Ft H4 Concrete Poles by Twenty-Six (26) 45Ft S5.7 Galv Steel Poles
    - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
        - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace Seven (7) 45Ft H4 Concrete Poles by Seven (7) 45Ft S5.7 Galv Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
        - No 406 Hazard Mitigation work identified to replace () 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
5. Feeder 7104-05 Scope: 5 EA Poles
    - Replace One (1) 45Ft H3 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace Twenty-Five (25) 45Ft H4 Concrete Poles by Twenty-Five (25) 45Ft S5.7 Galv Steel Poles
    - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
        - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace Eight (8) 45Ft H4 Concrete Poles by Eight (8) 45Ft S5.7 Galv Steel Poles
    - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
        - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
    - Replace One (1) 45Ft S5.7 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
    - Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
    - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 50Ft S8 Galv Steel Poles

- Replace One (1) 50Ft S8 Galv Steel Pole by One (1) 50Ft S8 Galv Steel Pole

6. Feeder 7201-02 Scope: 29 EA Poles
   - Replace Five (5) 45Ft H4 Concrete Poles by Five (5) 45Ft S5.7 Galv Steel Poles
   - Replace Five (5) 45Ft S3 Galvanized Steel Poles by Five (5) 45Ft S5.7 Galv Steel Poles
   - Replace Eleven (11) 45Ft H4 Concrete Poles by Eleven (11) 45Ft S5.7 Galv Steel Poles
   - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
     - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace Two (2) 45Ft S3 Galvanized Steel Poles by Two (2) 45Ft S5.7 Galv Steel Poles
   - Replace Two (2) 45Ft H4 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
   - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
     - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace One (1) 50Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   -
7. Feeder 7301-03 Scope: 37 EA Poles
   - Replace One (1) 45Ft H3 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace Sixteen (16) 45Ft H4 Concrete Poles by Sixteen (16) 45Ft S5.7 Galv Steel Poles
   - Replace One (1) 45Ft H6 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
     - No 406 Hazard Mitigation work identified to replace (1) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace Three (3) 45Ft S3 Galvanized Steel Poles by Three (3) 45Ft S5.7 Galv Steel Poles
   - Replace Ten (10) 45Ft H4 Concrete Poles by Ten (10) 45Ft S5.7 Galv Steel Poles
   - Replace Two (2) 45Ft H6 Concrete Poles by Two (2) 45Ft S5.7 Galv Steel Poles
     - No 406 Hazard Mitigation work identified to replace (2) 45' H6 concrete pole. Note: The 45' galvanized steel S5.7 pole cost is less than the 45' H6 concrete pole. In these cases, the Mitigation is accomplished by the 428 PA method of repair (MOR).
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace One (1) 50Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
8. Feeder 7303-01 Scope: 39 EA Poles
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace Eighteen (18) 45Ft H4 Concrete Poles by Eighteen (18) 45Ft S5.7 Galv Steel Poles
   - Replace Three (3) 45Ft S3 Galvanized Steel Poles by Three (3) 45Ft S5.7 Galv Steel Poles
   - Replace Nine (9) 45Ft H4 Concrete Poles by Nine (9) 45Ft S5.7 Galv Steel Poles
   - Replace One (1) 45Ft S3 Galvanized Steel Pole by One (1) 45Ft S5.7 Galv Steel Pole
   - Replace One (1) 45Ft H4 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace Two (2) 45Ft H4 Concrete Poles by Two (2) 50Ft S8 Galv Steel Poles
   - Replace One (1) 45Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole
   - Replace One (1) 50Ft H6 Concrete Pole by One (1) 50Ft S8 Galv Steel Pole

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Note: As indicated by the sub-applicant (LUMA) in the response "FEMA RFI - 45FT S-5.7 Galvanized Steel Pole", the shape factor for wind pressure will be different between concrete and steel poles. The shape factor of the concrete pole is 1.6 when having a square section and the shape factor of the steel pole is 1.0 when having a circular or dodecagonal section (12-sided). For example, the 45ft H4 concrete pole identified as equivalent to the 45ft S5.7 metal pole does not pass the Pole Loading Analysis (PLA) as the shape factor is 1.6 vs 1.0. For this purpose, we will be using circular or dodecagonal (12-sided) poles as a mitigation measure to meet with the new +160 mph factor.

(III) Hazard Mitigation Proposal (HMP) Cost

Total Net Hazard Mitigation Cost (Base Cost) =	$ 243,129.00
+ HM (Applicant A&E, Management & General Conditions) =	$ 63,002.37
Hazard Mitigation Total Cost =	**$ 306,131.37**

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(IV) HMP Cost-Effectiveness Calculations

FEMA's Benefit-Cost Analysis (BCA), methodology evaluates expected risk reduction benefits of a hazard mitigation project and compares those benefits to the cost of the mitigation project. FEMA Public Assistance Program and Policy Guide (PAPPG) Chapter 2. Section VII. C. defines cost effective mitigation as: The Hazard Mitigation Measure is cost effective through an acceptable Benefit Cost Analysis (BCA) with a resulting Benefit Cost Ratio equal to or greater than (1).

The Island Wide Benefit Cost Analysis (IWBCA) created for the PREPA infrastructure defines a maximum potential benefit using the incurred costs of the PREPA FEMA Accelerated Award Strategy (FAASt) fixed cost estimate, the mission assignments utilized for the reconnection effort, and the costs associated with loss of service. This maximum benefit has been developed to fund all mitigation projects from both Public Assistance Hazard Mitigation and the Hazard Mitigation Grant program.

It is the applicant's responsibility to maintain a record of approved IWBCA related projects to avoid running out of funds for their Mitigation portion projects.". Please see attached IWBCA Package

The cost of the Hazard Mitigation Proposal (HMP) described herein is $306,131.37 (Hazard Mitigation Total Cost). The cost of this HMP combined will all other proposals (both PA and HMGP) does not exceed the maximum potential benefit and is therefore deemed cost effective per FEMA Public Assistance Program and Policy Guide (PAPPG) V3.1 April 2018, Chapter 2, VII., Section C, BCA Rule. This Hazard Mitigation Proposal meets eligible repair and restoration cost-effective requirements.

****See Mitigation Profile Documents Tab in Grants Manager for complete version of this HMP and supporting documents *(HMP, HMP cost estimate, Supporting documents file)*.**

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Cost

Code	Quantity	Unit	Total Cost	Section
3510 (v0 Engineering and Design Services, Deduction - PREPA FAASt Global A&E 335168)	1.00	Lump Sum	($834,793.00)	Uncompleted
9201 (PAAP Fixed Estimate (No Value - Tracking Purposes Only))	1.00	Lump Sum	$0.00	Completed
9001 (v0 Contract, 428 - PREPA FAASt Donor Project 136271)	1.00	Lump Sum	$11,148,420.00	Uncompleted

CRC Gross Cost	$10,313,627.00
Total 406 HMP Cost	$306,131.37
Total Insurance Reductions	$0.00
CRC Net Cost	$10,619,758.37
Federal Share (90.00%)	$9,557,782.54
Non-Federal Share (10.00%)	$1,061,975.83

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
0	Pending	In Review		$10,726,511.94	90%	$0.00	

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	11/25/2024	$9,557,782.54	90%	Accepted	4339DRPRP00116861

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- The Subrecipient provided the estimate for this PW. FEMA validated the estimate and found it to be reasonable for the work to be performed.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.

Insurance

Additional Information

10/22/2024

GENERAL INFORMATION

Event: DR4339-PR

Project: SP 738672

Category of Work: Cat F - Utilities

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Maria

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2017 to 11/15/2017

Total Public Assistance Amount: $10,619,758.37(CRC Gross Cost $10,313,627.00 + Mitigation Amount $306,131.37).

COMMERCIAL INSURANCE INFORMATION

Does the applicant have a Commercial Policy that extends coverage for this facility: Yes

Policies Issued by: Willis Towers Watson, Multinational Insurance Company and Mapfre

Policy Numbers: Willis Towers Watson (B0804Q1966F17, B0804Q14312F17, B0804Q19673F17, B0804Q19672F17, B0804Q18529F17, B0804Q14312F17, B0804Q19674F17, B0804Q18411F17, B0804Q14310F17, B0804Q11038F17, B0804Q14507F17, B0804Q14312F17)

Mapfre Praico Insurance Company (1398178000644)

Multinational Insurance Company (88-CP-000307831-2, 88-CP-000318673-0, 88-CP000318674-0, 88-CP-000318675-0, 88-CP-000318676-0, 88-CP-000318677-0)

Policy Period: From: 5/15/2017 To: 5/15/2018

Policy Limits: $300,000,000.00

RCV or ACV: Replacement Cost Value

Deductible Amount $25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No

***NUMBER* OF DAMAGED LOCATIONS INCLUDED IN THIS PROJECT:** (1)

Damaged Inventory (DI) #661509:

FAASt [Distribution Pole and Conductor Repair - Mayaguez Group 1 - Phase 2]

Location: Distribution Pole and Conductor Repair - Mayaguez Group 1 - Phase 2

GPS Coordinates: Start [redacted] to [redacted] End.

Cause of Loss: Wind / Wind Driven Rain

Damage Inventory Amount: $10,619,758.37(CRC Gross Cost $10,313,627.00 + Mitigation Amount $306,131.37).

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Prior Obtain and Maintain Requirement:

No prior insurance requirements were found for this facility.

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Reduction(s):

No insurance reduction will be applied to this project as coverage is not anticipated. An anticipated insurance reduction of $193,746,436.00 was applied to FAAST project # 136271 for anticipated insurance proceeds for Hurricane Maria losses. For ease of reference, please see table of insurance allocations: "*PREPA Allocation Plan – All Disasters"* file.

Obtain and Maintain Requirement:

No Obtain & Maintain Requirement is being mandated for FAASt [Distribution Pole and Conductor Repair - Mayaguez Group 1 - Phase 2] because the facility does not meet the definition of building, equipment, contents, or vehicle.

Insurance Proceeds Statement:

FEMA acknowledges that the Applicant is in negotiations with their insurance carrier at the time of the FEMA insurance review and might have received partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy limits. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled on a case-by-case basis.

Standard Insurance Comments

FEMA Policy 206-086-1
PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)

A. Duplication of Benefits. FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery it is entitled to for that property.

2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.

3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from their insurer(s).

…

5. If an applicant has an insurance requirement from a previous event:

a. FEMA will reduce assistance by the actual or anticipated insurance proceeds, or the amount of insurance required in the previous disaster, whichever is greater.

b. FEMA will only consider insolvent insurers, legal fees, or apportionment of proceeds as described in Section VII, Part 2(A)(3) and (4) when the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster.

Virginia Hernandez Rivera, PA Insurance Specialist, CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Pole and Conductor Repair - Mayaguez Group 1 - Phase 2] (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Pole and Conductor Repair - Mayaguez Group 1 - Phase 2] (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders? **Yes**

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- a. The Subrecipient and/or Subrecipient's contractor shall follow the Low Impact Debris Removal Stipulations (LIDRS) as stated in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022. b. Unexpected Discoveries: Pursuant to Stipulation III.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm. c. Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out.
- ESA: PR Boa Conditions (for all feeders) - 1. Inform all project personnel about the potential presence of the Puerto Rican (PR) boa in areas where the proposed work will be conducted and provide training on PR boa identification. A pre-construction meeting will be conducted to inform all project personnel about the need to avoid harming these species. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973. An educational poster or sign with photo or illustration of these species will be displayed at the project site. 2. Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area and any area to be excluded and protected will be clearly marked in the project plan and in the field to avoid further habitat degradation outside of the footprint of the project. 3. Once areas are clearly marked, and right before the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), biologist or designated project personnel with experience on these species will survey the areas to be cleared to verify the presence of any PR boa within the Action Area. If a PR boa is found during the search, it should be captured and managed as per #5 below. Once the removal of vegetation begins, the biologist or designated personnel must remain at the work site and be ready to capture any boa that might be in harm's way as the result of the habitat disturbance (see #5). 4. For VI boas, once the Action Area has been searched, vegetation will be cut about one meter above ground prior to the use of heavy machinery for land clearing. Cutting vegetation by hand will allow VI boas present on site to move away on their own to adjacent available habitat. If there is no suitable habitat adjacent to the project site, any VI boa found will be relocated accordingly (see #6). 5. For all boa sightings (dead or alive), record the time and date of the sighting and the specific location where it was found. Data will also include a photo of the animal (dead or alive), relocation site GPS coordinates, time and date of the relocation, and comments on how the animal was detected and its behavior.
- RCRA: The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements.
- RCRA: Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and

federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.

- ESA: Condition for A. portoricensis (for feeder 6014-02)- Before initiating any work within the range of listed plant species and in areas with suitable habitat, applicants must conduct plant surveys. In the event that listed species are discovered at the project site, the Service must be notified. The Applicant must develop conservation measures to minimize or avoid impacts on those species and share those measures with the Service for evaluation and approval. If no listed plants are found during surveys, no further action is required. However, if a listed plant species is found while the project is being conducted, project personnel shall stop work, and the Service should be contacted for further technical assistance. Service's point of contacts: *. José Cruz-Burgos, Endangered Species Program Coordinator, Mobile: 305-304-1386, Office: 786-244-0081, jose_cruz-burgos@fws.gov. *. Omar Monsegur, Fish and Wildlife Biologist, Mobile: (305) 304-0292, omar_monsegur@fws.gov.
- ESA: PR Butterfly conditions (for feeders 6014-02, 7011-03, 7104-05) - a. The contractor must inform all personnel about the potential presence of the Puerto Rican harlequin butterfly and its host plant, prickly bush (Oplonia spinosa), in the project areas. A pre-work meeting should inform all project personnel about the need to avoid harming this butterfly and its occupied host plant. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. Educational material (e.g., posters, flyers, or signs with photos or illustrations of all the life stages of the Puerto Rican harlequin butterfly (i.e., eggs, caterpillar, chrysalids, and adult, and its host plant) should be prepared and available to all personnel for reference. b. Before starting any project activity, including removal of vegetation and earth movement, the contractor must clearly delineate the boundaries of the working area in the field to avoid unnecessary habitat impacts. Once the project areas are clearly marked, and before any work activity, including site preparation, personnel with knowledge and ability to identify the Puerto Rican harlequin butterfly (all life stages) and the prickly bush must survey the areas where the work will be performed for the presence of the species and its host plant. It is important to note that the Puerto Rican harlequin butterfly can be observed year-round in all life stages; thus, oviposition (egg-laying) may occur at any time during the year. c. If the prickly bush is present on the project site, try to avoid cutting the plant, even if no eggs, caterpillars, or chrysalids are present. d. If there is no prickly bush within the project area, but the butterfly is observed flying within the project area, do not harass, harm, pursue, wound, kill, trap, capture, collect, or attempt to engage in any such conduct, the species. e. Adult butterflies are often observed flying near the host plant as part of their mating behavior and for laying eggs. Project-related activities must stop if the prickle bush is found in the project area and the Puerto Rican harlequin butterfly is observed flying in that same area. A temporary 50-meter (164 feet) buffer zone of no activity or human disturbance should be established and clearly marked around that prickly bush until the butterfly moves out on its own.
- ESA: The Applicant must provide documentation at close-out that proves completion of required Conservation Measures.
- EO 11988: Applicant must obtain any required permits from the Puerto Rico Permits Management Office (OGPe) prior to initiating work and comply with any conditions of the permit established by the Planning Board (JP) for constructions in floodplains. All coordination (emails, letters, documented phone calls) pertaining to these activities and compliance must be provided and maintained in the Applicant's permanent files.
- ESA: PR Boa Conditions (for all feeders) - 6. If any PR boa (dead or alive) is found within the Action Area and on harm's way, the action will stop, and information will be recorded (see #4). All attempts will be made to immediately safely capture and relocate the animal within suitable habitat (forested) at least 1km from the Action Area and away from construction areas. PR boa relocation sites will be pre-determined before the project starts and sites shared with the Service for revision and concurrence. Relocation of PR boas will be conducted by trained, designated personnel ensuring the animal is not harmed or injured during the capture and relocation process. 7. Measures will be taken to avoid and minimize PR boa casualties by heavy machinery or motor vehicles being left in the Action Area. *. Any heavy machinery left on site (staging areas) or near potential PR boa habitat will be thoroughly inspected each morning before work starts to ensure that no boas have sheltered within engine compartments or other areas of the heavy machinery. If a PR boa is found within vehicles or heavy machinery, boas will be safely captured accordingly. If not possible, the animal will be left alone until it leaves the vehicle or machine by itself. *. The PR boa may seek shelter within debris piles. Measures should be taken to avoid and minimize boa casualties associated with sheltering in new debris piles as a result of project activities. New debris piles should be placed in areas as far as possible from forested areas. Prior to moving, disposing, or shredding, debris piles should be carefully inspected for the presence of PR boas. If debris piles will be left on site, we recommend they be placed in an undisturbed area. *. In the event a PR boa is found dead within the project area, the Federal Agency and the Recipient must contact the Service to appropriately dispose the animal. *. If a PR boa is accidentally injured or killed during capture and relocation activities during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. *. Should the forms of take reach the amount of exempted take during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. For questions and to submit reports, the Service's Point of Contact (POC) is José Cruz-Burgos, Endangered Species Coordinator, and can be contacted at: Mobile: 305-304-1386, Office phone: 786-244-0081, Office Direct Line: 939-320-3120
- ESA: Condition for PR Parrot, Sharp-shinned Hawk, and Broad-winged Hawk (for feeders 6014-02, 7104-05) - All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. During breeding seasons (see below), nest surveys shall be conducted if a project occurs within the range of any of the species listed above and if habitat for those species will be impacted by the proposed actions. Nest searches must be conducted by qualified personnel with the appropriate permits from the Puerto Rico Department of Natural and Environmental Resources (PRDNER) prior to start of work. If nesting activity is detected, all construction activities or human disturbance must be avoided within a 50-meter buffer around any nest(s) found within the project area. This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Outside the breeding season no nest surveys are required, but if a nest is encountered, all construction activities or human disturbance must be avoided within a 50-meter buffer around that nest(s). This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Furthermore, if any of the species indicated above is observed

(e.g., foraging, resting) within the project area, avoid any disturbance to the individual(s) and do not flush the bird until it leaves on its own. Nesting seasons: *. Puerto Rican parrot: February-June. *. Puerto Rican broad-winged hawk: December-June. *. Puerto Rican sharp-shinned hawk: December-June. For all nest sightings, the Applicant must record the time and date of the sighting and the specific location where it was found. All sightings and incidental lethal take reports should be sent to the USFWS Caribbean Ecological Services Field Office at Caribbean_es@fws.gov. For questions, the Point of Contact (POC) is José Cruz-Burgos, Endangered Species Program Coordinator, and can be contacted at: - Mobile: 305-304-1386 - Office phone: 786-244-0081 - Office Direct Line: 939-320-3120 - Email: jose_cruz-burgos@fws.gov

- ESA: PR Butterfly conditions (for feeders 6014-02, 7011-03, 7104-05) - f. Once the Puerto Rican harlequin butterfly has moved away, within a period of 24 to 36 hours, a search of the prickly bush that has been buffered should be conducted to determine the presence of any eggs, caterpillars, or chrysalids of the butterfly on the plant. The contractor or the Applicant should send a report of the observation and its findings to caribbean_es@fws.gov after the 36-hour search is concluded. g. If, after the initial search or after the 24 to 36-hour search, any life stage of the Puerto Rican harlequin butterfly is found in the prickly bush, take the following actions: o Clearly mark the host plant with flagging tape. o Establish a 10-meter (32-foot) buffer zone around the bush for its protection. o Eggs are typically found on the prickly bush's newly grown, tender branches. Once the egg hatch, the caterpillar moves and feeds throughout the bush. Therefore, avoid cutting off the prickly bush within the project site even if no eggs, caterpillars, or chrysalids are present. o Work within the 10-meter buffered area may resume when no signs of any live life stage of the butterfly are detected, which usually takes approximately 60 to 120 days. h. For all Puerto Rican harlequin butterfly sightings (all life stages), the time and date of the sighting and the specific location where the butterfly was found must be recorded. Data should also include a photo of the butterfly (if possible) and the habitat where it was observed, site GPS coordinates, and comments on how the butterfly was detected and its behavior. All Puerto Rican harlequin butterfly sighting reports should be sent to the Service's Caribbean Ecological Service Field Office at caribbean_es@fws.gov. j. For questions regarding the Puerto Rican harlequin butterfly, the Point of Contacts are: José Cruz-Burgos, Endangered Species Coordinator: Mobile: 305-304-1386 Office phone: 786-244-0081 Office Direct Line: 939-320-3120 Email: jose_cruz-burgos@fws.gov Carlos Pacheco, Fish and Wildlife Biologist Mobile: 786-847-5951 Office Direct Line: 939-320-3113 Email: carlos_pacheco@fws.gov
- RCRA: The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities.
- ESA: Conditions for Beach Turtles, part 1 (for feeder 7008-05): - During sea turtle nesting season (March 1 to November 30), a qualified sea turtle monitor must survey beach work areas each morning for possible nests. Nests found in the area should be marked or flagged in place. Outside of nesting season, these areas should be surveyed at least twice a week. Debris removal or construction on beaches may only begin after morning surveys are completed by the sea turtle monitor, and nests are clearly marked. - All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973, as amended. - Surveys shall be conducted by sea turtle permit holders or trained personnel following PRDNER/DPNR-DFW protocols. (See image and list of contacts below.) - Nests located adjacent to the work area should be marked with flagging, creating a 10-foot square roped-off buffer with an unobstructed path leading from the nest to the water. - Nest surveys must be conducted in the mornings, immediately before any construction activity commences. - Sea turtle monitoring groups should possess site-specific information for nests in their designated areas and should communicate these details to work crews to ensure avoidance. For Puerto Rico contact: ATMAR: 787-448-8627, Chelonia: 787-306-0916, DRNA Loiza: - 787-453-6484, DRNA Rio Grande: - 787-646-9689, Reserva Natural de Humacao: 787-594-6568, Siete Quillas: 787-688-6763, TICATOVE Vieques: 787-438-4493, Tortugueros del CEN: 787-635-4493, Tortugueros de Culebra: 787-685-7820, Tortugueros de Isla Verde: 787-604-4959, Tortugeros del Sur: 787-341-8888, Vida Marina: 787-380-5254, 787-206-6800, Yo Amo el Tinglar: 939-276-9901
- ESA: Conditions for Beach Turtles, part 3 (for feeder 7008-05): - All excavations and temporary alteration of beach topography shall be contoured or leveled to the natural beach profile prior to dusk each day. This includes raking of tire ruts, filling pits or holes where debris was removed, etc. Any potential obstructions such as debris piles, equipment, etc. shall also be removed from the beach by the end of each workday. Fill must be placed as landward as practicable to establish or repair dune features. The existing or pre-disaster beach and dune profile must be considered when determining the appropriate siting of fill to provide reasonable longevity of the project. - No vehicles, equipment, staging or debris should be used, parked, or stored landward of the primary dune or in vegetated areas. Staging/parking/storage areas shall be located on paved surfaces as much as possible and outside of vegetated areas. Lightweight, all-terrain style vehicles, with tire pressures of 10 psi or less can operate on the beach and are the preferred transportation method. However, use of heavy equipment on the beach can be allowed provided it is taken off the beach by 1600 AST local time every night using an approved and designated beach access. All driving on the beach shall be between the high-water mark and the water's edge. - Removal of vegetation, fence installation, construction activities, and light installation shall be limited within 50 meters from the high tide line. - No construction involving lights shall be used during the nesting season. Outside of the nesting season, in Puerto Rico, it is mandatory to have a lighting plan that incorporates sea turtle-friendly lights for coastal areas whenever lights are being repaired or newly installed. For projects in Puerto Rico, compliance with Puerto Rico Law 218 of 2008, which addresses the Control and Prevention of Lighting Pollution in Puerto Rico, and the PR EQB 2016 Regulation to Control and Prevent Light Contamination, is also required. These lighting plans should be submitted to the Service at caribbean_es@fws.gov for review. When submitting the lighting plan, please include: the name and location of the project, a brief description of the project, an associated tracking number (if available), and a Point of Contact. After the plan has been fully implemented, the Applicant is responsible for conducting a lighting inspection to identify and correct any remaining problematic lights. - If an unmarked sea turtle crawl is encountered during or prior to project activity, the work crew shall not disturb the integrity of the crawl. Project personnel shall follow the crawl up the beach or into the dune and contact the qualified sea turtle monitor to inform of the location of the crawl. Care shall be taken to avoid walking or driving equipment over or near a crawl so that a potential nest is not damaged. - All sea turtle sightings and incidents involving nesting sea

turtles or hatchlings shall be reported to PRDNER/DPNR-DFW and the Service. The Service's point of contact is José Cruz-Burgos, Endangered Species Program Coordinator: Mobile: 305-304-1386, Office phone: 786-244-0081, Office Direct Line: 939-320-3120; Email: caribbean_es@fws.gov or jose_cruz-burgos@fws.gov

- ESA: Conditions for Beach Turtles, part 2 (for feeder 7008-05): - During the sea turtle nesting season, repair or replacement of structures shall occur in the same location or footprint of the previously permitted structure. If the current project's footprint does not stay within previously permitted structure's footprint, then the Service must be consulted. - Relocation of sea turtle nests to accommodate construction is not authorized. - All project activity shall be confined to daylight hours following the completion of all necessary marine turtle surveys and conservation activities. The sea turtle monitor shall be available via telephone after the initial inspection throughout the workday. - If planting will occur, only native plant species are authorized to be planted. Existing native dune vegetation shall be disturbed to the minimum extent necessary. Removal of standing and live coastal vegetation (e.g., sea grapes, mangroves) that are not a hazard is unauthorized. No sea grass, sea weeds, algae nor beach sand shall be removed during beach debris removal efforts. Any vegetation planting shall be installed by hand labor and tools. Irrigation systems shall not be installed within nesting habitat. Prior to any planting, the Applicant will submit a vegetation plan to the Service at: caribbean_es@fws.gov. If a sea turtle nest is disturbed or uncovered during vegetation planting activity or project excavation, all work shall cease, and the sea turtle monitor shall be immediately contacted to assess the situation and provide guidance on the appropriate steps to safeguard the nest. If a nest(s) cannot be safely avoided during construction, all activity within the affected project area shall be delayed until complete hatching and emergence of the nest. - Placement of fill shall not occur within 10 feet of or in any area seaward of a marked sea turtle nest. Nests shall be marked in place with a roped off 10-foot buffer. Dependent upon the fill volume and slope, distance offset from marked turtle nests may be required to be larger to avoid indirect impacts (e.g., fill slumping) to the nest. If the turtle nest cannot be avoided by this distance due to the scope of the project, all work near the nest must be postponed until nestlings emerge from the nest and make their way safely to the sea. If a sea turtle nest is found after November, work should be postponed until the nestlings have safely hatched and made their way to the sea.
- NEPA: Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to hardened surfaces can be provided at close-out.
- NEPA: All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g., a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a Sub-recipient or their contractor beginning to borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at close-out and must include fill type (private, commercial, etc.), name, fill site GPS coordinates (not of the company/governmental office), address, and type of material.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Pole and Conductor Repair - Mayaguez Group 1 - Phase 2] (Distribution)**.

Final Reviews

Final Review

Reviewed By Amaro, Luis N. **Reviewed On** 10/28/2024 9:42 AM PST

Review Comments

LNA 10/28/24. This project has been reviewed, found eligible and cost reasonable and it is ready to continue the award process

Recipient Review

Reviewed By Salgado, Gabriel **Reviewed On** 10/31/2024 6:19 AM PST

Review Comments

Recipient review completed. Applicant must ensure to compliance with all regulatory requirements and PA policy. Project is ready for applicant review.

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of $10,619,758.37 for subaward number 11686 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Project Signatures

Signed By Miller, Thomas **Signed On** 10/31/2024