

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

NEPR

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

CASE NO.: NEPR-MI-2021-0002

**MOTION TO SUBMIT PREPA'S DECEMBER 2024 UPDATE TO THE PREPA-LUMA-GENERA
90-DAY PLAN**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its counsel of record, and respectfully submits and prays as follows:

1. On March 26, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") entered a Resolution and Order (the "March 26 Order") requiring PREPA to, among other things, "continue reporting to the Energy Bureau and FEMA, within the next five (5) years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau".
2. On July 15, 2021, LUMA Energy, LLC and LUMA ServCo, LLC ("LUMA") submitted before this Energy Bureau a document titled *Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed during the Technical Conference* ("July 15th Motion") wherein LUMA proposed, among others, that reporting in this docket be done quarterly and that updates to the 90-Day Plan in relation to the 10-Year Infrastructure Plan be provided to the Energy Bureau

during the last month of every quarter as it is provided to FEMA. See the July 15 Motion on pages 8-9.

3. On September 21, 2021, PREPA and LUMA filed a joint motion titled Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan ("September 21 Motion"). In the September 21 Motion, LUMA and PREPA informed that in the future, they would continue to file the PREPA-LUMA 90-Day Plans instead of 90-Day updates of the 10-Year Infrastructure Plan given that FEMA was only requiring the 90-Day Plans. See the September 21 Motion on page 4.
4. In compliance with the previously stated, PREPA hereby submits as Exhibit 1 to this Motion, the December 2024 update to the PREPA-LUMA-Genera 90-Day Plan. This plan also includes information on areas of coordination among PREPA, LUMA, and Genera, specific areas of focus of each entity, and an overview of key next steps for the upcoming 90 days in relation to the 10-Year Infrastructure Plan.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take notice of the aforementioned and accept the December 2024 PREPA-LUMA-Genera 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 18th day of December 2024.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and courtesy copies were sent via e-mail to LUMA Energy, LLC through its counsels of record at

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Exhibit 1

December 2024 PREPA-LUMA-Genera 90-Day Plan



FEMA



PREPA-LUMA- Genera 90-Day Plan

December 2024



Puerto Rico Electric
Power Authority

CENTRAL OFFICE FOR RECOVERY,
RECONSTRUCTION AND RESILIENCY
COR3





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I. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for Puerto Rico Electric Power Authority's (PREPA) T&D System as outlined within the Operations and Maintenance Agreement (OMA) between PREPA, Puerto Rico Public-Private Partnership Authority (P3A), and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and are now the responsibility of LUMA.

On July 1, 2023, GeneraPR assumed overall responsibilities for PREPA's Generation System as outlined within the OMA between PREPA, P3A, and Genera. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Dams, Hydro, and Irrigation asset categories; while projects in the Generation asset categories ("Generation Projects") were transitioned to and are now the responsibility of GeneraPR.

This 90-Day Plan provides information on areas of coordination among PREPA, LUMA, and Genera, as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90-Days

The content below summarizes the next steps across the following seven areas: 1) Federal Grant Management; 2) Environmental and Historic Preservation (EHP); 3) Engineering Management; and 4) Enterprise Project Management (EPM).

PREPA Resiliency Plan and Water Asset BCA

PREPA Focus Area

- PREPA received FEMA and COR3 comments to the Integrated Resilience Plan in August of 2024. More specifically, PREPA received comments on the Resilience Plan Water Assets provided to the Central Office of Recovery, Reconstruction, and Resiliency (COR3) in December of 2023 and subsequently consolidated and submitted to FEMA in February of 2024, which detailed the following information and updated the document accordingly:
 - Failure to consider water assets within the Island-wide Benefit Cost Analysis (IWBCA):



- FEMA omission of the Bipartisan Budget Act (BBA) implementation and funding towards water assets (\$0 approved for water asset BBA).
- General goals of resiliency plan (resiliency strategy)
 - Target items considered within the IWBCA:
 - Grid resiliency (hydroelectric plants)
 - Targets items not considered within the IWBCA:
 - Life safety (dam repairs and mitigation, early warning system)
 - Loss of water function (conveyance system repairs of irrigation and hydroelectric systems)
 - Reduction in flooding (reservoir capacity, conveyance system repairs, dam strengthening)
 - Evacuees (dam strengthening and conveyance system repairs)
 - Effectiveness of resiliency plan is 85.51%
 - Before mitigation impact: **\$59,673,180,567**
 - Post mitigation impact: **\$8,647,866,329**
- PREPA revised the Water Asset Resilience Plan to align with the Energy Sector Resilience Planning Guidelines, in which PREPA:
 - Identified threats and their impacts including:
 - Natural threats from hurricanes, earthquakes, and droughts
 - Technological threats such as outdated infrastructure; and
 - Human Caused threats in human error.
 - Assessed PREPA vulnerabilities of threats and impacts;
 - Provided quantitative risk assessments of all identified vulnerabilities; and
 - Offered resilient solutions to based on FEMA federal funded proposed projects.
 - The resilient solutions effectiveness remains at 85.51% for

Federal Grant Management

PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3, and FEMA for compliance with EHP requirements.
 - PREPA is working alongside FEMA and COR3 to organize approved SOWs into logical grouping for Project Formulation submissions (*Detailed SOWs*).
 - The logical grouping of SOWs considers EHP limitations to evaluate all environmental impacts under one area.



- PREPA continues to revise *Detailed SOWs* (DSOW) in accordance with FEMA 406-Mitigation and EHP feedback and comments.
 - In the past quarter PREPA (re)submitted a total of two (2) FEMA FAASt projects (*DSOWs & 406-Hazard Mitigation Proposals*) to FEMA or the CRC for review including:
 - South Coast Irrigation District (also referred to as FAASt South Coast Irrigation District – Canals),
 - Additionally, a version 0 of the project for geotechnical investigations was submitted
 - Lajas Irrigation District (also referred to as FAASt Lajas Irrigation District)
 - In the past quarter six (6) projects remain in the applicant resubmission queue and are awaiting additional information from project designers to advance to the next stage (projects expected for resubmission next quarter are noted):
 - Toro Negro Hydroelectric System – expected resubmission,
 - Rio Blanco Hydroelectric System – expected resubmission,
 - Caonillas Hydroelectric Plant No. 1 – expected resubmission
 - Guayabal Dam Repair and Mitigation Project,
 - Dams Minor Repairs – expected resubmission, and
 - Guajataca Dam (not projected to be advanced for at least two years),
 - In addition to the previously listed project PREPA anticipates the resubmission of multiple dredging projects. These submissions will incorporate the relevant EHP information, and include:
 - Dos Bocas Reservoir Dredging,
 - Caonillas Reservoir Dredging,
 - Guajataca Reservoir Dredging,
 - Garzas Reservoir Dredging, and
 - Guerrero Reservoir Dredging
 - Finally, PREPA anticipates the submission of two DR-4671 (Fiona) Projects within the next quarter including:
 - Carite Spillway Repairs and Mitigation
 - Dos Bocas Transformers
 - Guamani and Tres Cuartitos
- PREPA will work with FEMA to respond promptly to any outstanding RFIs.
 - This quarter PREPA has responded to RFIs for three projects:



- Guayabal Dam
 - South Coast Irrigation District
- FEMA Hazard Mitigation Grant Program (HMGP) and Housing and Urban Development (HUD) funded projects were advanced including overarching components of packages.
 - The grant application process was advanced for Patillas Dam Seismic Retrofit 404/CDBG-Mitigation project, including,
 - Weekly meetings are held with the US Bureau of Reclamation (USBR) to reengage and coordinate the 30% design phase of the project.
 - PMP is finalized and will be approved no later than June 13, 2024
 - Drilling for dewatering tests and reports are continuing.
 - An updated draft EA shall be provided to Vivienda and FEMA in September/October of 2024.
 - PREPA responded to ineligibility reviews from PRDOH for two (2) electrical power reliability and resiliency program (ER2) projects.
 - PREPA responded with a reconsideration letter in August of 2024.
 - COR3 provided a subsequent Program-Based Reconsideration Denial with a 20-calendar day response.
 - PREPA responded to the denial of the following projects:
 - Battery Energy Storage System (BESS) Project
 - New Hydro-Electric Plants Project
 - The decision is awaiting administrative review by an official examiner for one project:
 - Battery Energy Storage System (BESS) Project
- PREPA submitted appeals for one (1) DR-4671 Hurricane Fiona Hydroelectric Projects denial to COR3.
- PREPA will submit progress and financial quarterly reports for the period ending 9/30/2024 on all 428 and 404-obligated projects.

Environmental and Historic Preservation

PREPA Focus Areas

- Complete EHP checklist and documentation requirements for all PREPA projects based on information received by project designers.
- Respond to EHP RFIs. In the past quarter, two (2) FAASt EHP RFI responses were provided:
 - Guayabal Dam
 - South Coast Irrigation District – Geotechnical Studies.



- Geotechnical Studies and information were provided for the following projects:
 - Guajataca Dam – approved, studies underway.
 - South Coast Irrigation District – awaiting FEMA environmental clearance.
- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
 - Includes final studies to be conducted by the engineering team including:
 - Dewatering Tests
 - Borrow Area Studies
 - Outlet Works Design
 - Survey (Utility, Contractor Land Use, Property Boundaries, etc.)
 - Development of the project impact list and draft Environmental Assessments
 - PREPA received a document recording projected environmental impacts from USBR in September and is developing a draft EA document for Vivienda to revise. PREPA does not intend to submit the draft EA to Vivienda until USBR completes and submits their 30% designs. The 30% designs are anticipated by the end of next quarter.
- PREPA received endorsements from Puerto Rico Department of Housing (Vivienda/PRDOH) and requested a collaborative relationship between the US Army Corps of Engineers (USACE) and Vivienda for the preparation of the environmental documents to comply with the National Environmental Policy Act (NEPA) for the Patillas Dam Project.

Engineering Management

PREPA Focus Areas

- PREPA has continued the development of engineering design for EHP approval.
 - Preliminary results for studies were received for nine (9) of eleven (11) reservoir dredging projects.
 - Geotechnical Investigations at the South Coast Irrigation District are pending FEMA EHP clearance.
 - Geotechnical Investigations commenced for the Guajataca Dam Project.
- Due to the complexity of the water asset projects, PREPA requested technical assistance from USACE in an umbrella MOA to provide support with design, project management, and construction management. The specific tasks assigned to USACE for technical assistance should be signed and approved by next quarter, at which point PREPA intends to submit finalized scopes of work for the following projects:
 - Toro Negro Hydroelectric System



- Rio Blanco Hydroelectric System
 - Caonillas Hydroelectric Plant No. 1
 - Dams Minor Repairs
 - Guayabal Dam Repairs and Mitigation
- Dredging Projects:
 - A/E design firms were selected for individual projects: CSA and AECOM were the two design firms selected.
 - Planning Phase technical reports were prepared and submitted by the designers to PREPA detailing the project overviews, considerations, and projected alternatives for nine of eleven.
 - Expected submittals for next quarter include 30% designs for
 - Dos Bocas Reservoir Dredging,
 - Caonillas Reservoir Dredging,
 - Guajataca Reservoir Dredging,
 - Garzas Reservoir Dredging,
 - Guerrero Reservoir Dredging, and
 - Lucchetti Reservoir Dredging (end of quarter).
- Guajataca Dam – Project requires specialized skillsets, and management has finalized the evaluation of the contract structure to receive such services from USACE. The Project Management Plan for technical studies and project design is currently under development.
 - USACE received approval for the Guajataca Dam Boring and Staging Area Plans.
 - This will be the next action.
- IT/OT Telecoms was approved by FEMA.
 - The Project Kick-off Meeting was held this quarter. Project is under construction.
- Early Warning System (404 Mitigation Funding)
 - RFP for solicitation of a design/build contractor was issued in early October of 2023.
 - Proponents have been selected to execute design/build. Under contract negotiations.
 - This project has received FOMB approval, and a kick-off meeting was conducted last quarter.
 - Project work is ongoing.

Enterprise Project Management (“EPM”)

PREPA Focus Areas

- Continue managing project schedules, tasks, budgets, and progress in PREPA’s system of recording, MS Project Online.
- Continue refining project management controls and artifacts aligned with



- federal requirements.
- Continuing integration of federally funded projects into PREPA's EPM program to allow for project management across the entire portfolio, including non-federally funded projects
 - Refine MS Power BI reporting dashboards and develop standard reporting at the portfolio level.
 - Monitor and manage implementation progress through the EPM program.

III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Water Asset projects *Detailed SOWs* once approved by PREB. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the second quarter of 2024, all of which are Water Asset projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

Table 1.1 – PREPA 2025 Q1 Project Submittal Milestone

Project Information						Design Progress			
#	FEMA ID	Project Title	Asset	Project Formulation Status	SOW Submission Date or Target	Stage	Commencement Date	Anticipated Date of Completion	Overall Percentage of Completion
1	180723	FAAST - Rio Blanco Hydroelectric System (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Feb-25	Planning & Design	Sep-22	Oct-25	30%
2	436468	FAAST - Toro Negro Hydroelectric Conveyance Canal and Penstock Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Feb-25	Planning & Design	Sep-22	Jun-25	35%
3	334770	FAAST - Guajataca Dam - Permanent Repairs (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Preliminary Studies Soil Investigations Underway	Dec-28	Planning & Design	Jan-24	Dec-28	3%
4	436621	FAAST - Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Dec-24	Planning & Design	Jul-23	Jul-25	25%
5	721184	Guayabal Dam Seismic Retrofit	Dams, Irrigation Channels & Reservoirs	USACE to take on Design	Aug-24	Planning & Design	Pending FEMA approval	Dec-27	5%
6	728260	FAAST - Caonillas 1 Hydro System (Hydro)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	May-24	Planning & Design	Jul-23	Jan-25	30%
7	435769	FAAST - South Coast Irrigation District - Canals (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Review Pending Soil Studies	Aug-24	Planning & Design	Sep-23	Jun-25	35%
8	436467	FAAST - Isabela Irrigation District - Canals (Water Assets - Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Oct-24	Planning & Design	Apr-23	Sep-25	30%
9	436462	FAAST - Lajas Irrigation District - Canals (Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW	Sep-24	Planning & Design	Jun-23	Nov-25	30%
10	334811	FAAST - Dos Bocas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Feb-25	Planning & Design	Dec-22	Oct-25	15%

Project Information						Design Progress			
#	FEMA ID	Project Title	Asset	Project Formulation Status	SOW Submission Date or Target	Stage	Commencement Date	Anticipated Date of Completion	Overall Percentage of Completion
11	178722	FAASt - Caonillas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Feb-25	Planning & Design	Dec-22	Oct-25	15%
12	334772	FAASt - Guayabal Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Sep-25	Planning & Design	Dec-22	Oct-25	10%
13	335206	FAASt - Matrullas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Sep-25	Planning & Design	Dec-22	Oct-25	10%
14	335207	FAASt - Guineo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Sep-25	Planning & Design	Dec-22	Oct-25	10%
15	334803	FAASt - Loco Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Mar-25	Planning & Design	Dec-22	Mar-25	10%
16	334813	FAASt - Guayo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Mar-25	Planning & Design	Dec-22	Mar-25	10%
17	334773	FAASt - Lucchetti Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Mar-25	Planning & Design	Dec-22	Mar-25	10%
18	334771	FAASt - Guajataca Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-25	Planning & Design	Dec-22	Sep-25	10%
19	334798	FAASt - Guerrero Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-25	Planning & Design	Dec-22	Aug-25	10%
20	334769	FAASt - Garzas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-25	Planning & Design	Dec-22	Sep-25	10%
21	746897	BONUS	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending FEMA EHP Approval and SHPO Consultation	Jun-24	Planning & Design	Aug-23	Jul-24	30%