

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

**NEPR**

**Received:**

**Jan 8, 2025**

**9:01 PM**

IN RE: PLAN PRIORITARIO PARA LA  
ESTABILIZACIÓN DE LA RED  
ELÉCTRICA

Case No.: NEPR-MI-2024-0005

Matter: Motion Submitting Responses to Items  
8, 12 and 14 (a) of Resolution and Order of  
December 5, 2024

**MOTION SUBMITTING RESPONSES TO ITEMS 8, 12 and 14 (a) OF RESOLUTION  
AND ORDER OF DECEMBER 5, 2024**

**TO THE ENERGY BUREAU:**

**COMES NOW**, GENERA PR LLC (“Genera”), through its undersigned counsel and, very respectfully, states and prays as follows:

1. On June 13, 2024, the Puerto Rico Energy Bureau (“PREB”) issued a *Resolution and Order* instructing the Puerto Rico Electric Power Authority (“PREPA”), LUMA Energy, LLC and Luma Energy ServCo, LLC (“LUMA”), and Genera PR LLC (“Genera”), to elaborate and present to the PREB their respective Electric System Stabilization Plans (“Preliminary Plan”).

2. On July 8, 2024, Genera filed a motion through which it presented its *Preliminary Plan*. On July 11, 2024, the PREB acknowledged receipt of Genera’s *Preliminary Plan* and noted that the document met the basic expectations of the PREB.

3. On December 5, 2024, the PREB issued another *Resolution and Order* stating that “[u]pon review of the filings, the Energy Bureau has determined that additional information is required to conduct a thorough evaluation of the stabilization plans submitted.” (“December 5 Order”). Accordingly, the PREB ordered PREPA, Genera and LUMA to respond to a Request of Information (“ROI”) that was attached to the *Resolution and Order*.

4. On December 23, 2024, Genera filed its responses to Items 1-7, 9-11 and 13, 15, 16 of the ROI. In that same motion, Genera requested an extension until January 8, 2025, to complete Items 8, 12 & 14(a) of the ROI. (“December 23 Motion”).

5. Consistent with the request made in the December 23 Motion, Genera hereby submits its responses to Items 8, 12 & 14(a) of the ROI. *See* Exhibits A & B.

WHEREFORE, Genera respectfully requests the PREB to take notice of the foregoing and deem Genera in full compliance with the December 5 Order.

It is hereby certified that this motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case: **Lcdo. Alexis Rivera**, [arivera@gmlex.net](mailto:arivera@gmlex.net); **Lcda. Mirellis Valle**, [mvalle@gmlex.net](mailto:mvalle@gmlex.net); **Lcda. Laura T. Rozas**, [laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com); **Lcda. Margarita Mercado**, [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com).

In San Juan, Puerto Rico, on January 8, 2025.

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Exhibit A – Requirement of Information Order December 5, 2024

Docket Number: NEPR-MI-2024-0005

In Re: PLAN PRIORITARIO PARA LA ESTABILIZACIÓN DE LA RED ELÉCTRICA

Re: Requirement of Information

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**GPR-PREB-NEPRMI20240005-20250108-#8(a)**

**Status of New Resources**

8. What is the status of the acquisition of an additional 560MW of flexible generation, similar to the 350MW of temporary generation approved for the Palo Seco and San Juan sites?

- a. How long would it take to complete this acquisition and have the units injecting into the grid?
- b. How does the above timeline compare to the USACE experience with the 350MW of temporary generation installed between Palo Seco and San Juan?
- c. Is there an existing USACE contract that could be activated to facilitate this acquisition? Explain.

**Response:**

The additional 560 MW of flexible generation mentioned in the Electric System Stabilization Plan was proposed as a mitigation measurement to reduce the LOLE together with the 350 MW already installed on a temporary basis. Whether determined is a feasible solution to increase emergency generation, PREB would have to approve it and allow Genera to initiate an RFP process for the acquisition of the units. This initiative has been supported and was included in an “Urgent Request for Electric Grid Stabilization Support” request sent to Department of Energy by the Governor of Puerto Rico d FEMA on January 6, 2025.

**Progress:**

- Genera is actively working in repairing existing generation capacity to provide additional megawatts to the grid to enhance reliability and stability.
- Genera is exploring the potential use of federal funds to cover the costs of this project.

**Next Steps:**

- If funds are approved by the Federal Government, Genera will issue a Request for Proposals (RFP) to identify the units that are best suited to stabilize the grid effectively.
- Then, scope of work and estimated costs will be formally submitted for PREB's approval.

As of now, there is no formal timeline or comparison available for this acquisition process because funds haven't been approved by the Federal Government yet.

**GPR-PREB-NEPRMI20240005-20250108-#12**

Describe how Genera plans to cover the expenses associated with the operation and maintenance of the proposed 560MW of flexible generation discussed in question 8.

**Response:**

Please see response GPR-PREB-NEPRMI20240005-20250108-#8(a).

**GPR-PREB-NEPRMI20240005-20250108-#14**

14. Document Attachment 1, Electric System Stabilization Plan, Version July 8, 2024. Section IX. Electric System Stabilization Plan states "In the short term, the plan focuses on key repairs to existing facilities", and "Also, the plan includes projects to replace components that are the most common cause of forced outages. These projects aim to not only add generation capacity, but to reduce forced outages with reliable generation..." (page 35).

Figure 7 is a "Workplan to Increase Reliability 2023-2025 Increase Capacity Goals" and shows a June 2023 capacity of 3,100 MW, a "Phase I" value of 4,057 MW, a "Phase II" value of 4,300 MW and a "Phase III" value of 4,500 MW. Pag 38.

Figure 8 is a "Workplan to Increase Reliability". It shows an "Increase Capacity from 46 to 60%" by July 2024, under the Strategic Priority of "Short-Term Repairs". It also shows a Goal: Reduce Forced Outages in 50%" by Q4-2025, under the Strategic Priority of "Replace Critical Components". Page 39.

Genera states "...Genera has had considerable success increasing baseload unit capacity from 46% to over 62% since July 2023" (page 41). Table 4 lists Phase I, Phase II and Phase II Short-Term Repairs (page 45).

Appendix A, "Status of Thermal Generation Fleet", contains a list of legacy units with associated nameplate capacity (MW), commercial operation date, status and refurbishment and retirement plans (pages 94-98).

a. Provide an updated Appendix A "Status of Thermal Generation Fleet" availability projection in Excel file format with the following specific information for each unit listed, for each month from September 2024 through December 2026:

- i. Available capacity in MW, accounting for any current deration of nameplate capacity for the given month, and accounting for any further deration due to full or partial planned maintenance.
- ii. Indicator if planned maintenance outage is anticipated for that month.

- iii. Nature of the specific work anticipated for any month with full or partial maintenance outage.
- iv. Expected duration (days) of planned full or partial maintenance for that month for the given unit.

**Response:**

Please see attachment GPR-PREB-NEPRMI20240005-20250108-#14.