

**GOVERNMENT OF PUERTO RICO
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

**SUBJECT: Informative Motion on the Status of
SOW: 4 x 25 MW BESS Interconnections at
LUMA 38kV System, Request for Confidentiality
and Supporting Memorandum of Law**

**INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS
INTERCONNECTIONS AT LUMA 38KV SYSTEM, REQUEST FOR CONFIDENTIALITY
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 submit the following:

I. Submission on the Status of Project

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 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. This Energy Bureau thereafter determined this directive applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law*. Therein, LUMA submitted the scope of work (“SOW”) for the “4 x 25 MW BESS Interconnections at LUMA 38kV System” transmission and distribution project (“T&D Project”), for the Energy Bureau’s review and approval before submitting it to COR3 and FEMA (“August 25th Motion”).

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order in which it approved the “4 x 25 MW BESS Interconnections at LUMA 38kV System” T&D Project SOW. It determined that this project was necessary to improve the system’s reliability (“August 30th Order”).

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order in which it ordered LUMA “to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the project” (“January 3rd Order”). See January 3rd Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System* to comply with the January 3rd Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the project until its June 2025 completion date (“January 14th Order”). See January 14th Order at 2. The status report should include:

- i) The locations of the twenty (20) sites studied;
- ii) The final four selected sites;
- iii) The cost to complete the studies of the twenty sites.
- iv) Indicate the funds utilized to pay for these studies and the amount spent to date.
- v) The reimbursement status of these funds, or if they were advanced by FEMA
- vi) The DSOW presented to FEMA and COR3;

- vii) The ROT and LUMA responses to such ROT requested by FEMA and COR3;
- viii) The FAASSt number for the project; and
- ix) An updated cost estimate based on the DSOW.

See Id.

7. In compliance with the January 14th Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this Motion. LUMA is submitting herein a redacted public version of *Exhibit 1* protecting confidential information associated with Critical Energy Infrastructure Information (“CEII”). As explained in this Motion, portions of *Exhibit 1* 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

8. 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 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).

9. 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).

10. 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.

11. 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.

12. 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).

13. 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

14. *Exhibit 1* contains portions of CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the *Exhibit 1* with CEII warrants 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.¹ In at least two Data Security and Physical Security proceedings,² this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure.

15. 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

¹ *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).

² *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

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.

16. Similarly, the Energy Bureau has granted LUMA's requests for confidential treatment of portions of 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.

17. 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.

18. 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.

19. 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.*

20. 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”).³

³ 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--

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).⁴

21. Portions of *Exhibit 1* qualify as CEII because they contain the express coordinates 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 in *Exhibit 1*. The information identified as confidential in this paragraph is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that,

(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.

⁴ 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;

(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.

on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of *Exhibit 1* with CEII from disclosure, given the nature and scope of the details included in those portions of Exhibit.

22. Based on the above, LUMA respectfully submits that portions of *Exhibit 1* 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 *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.

C. Identification of Confidential Information

23. 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 *Exhibit 1* 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	4x25 MW BESS Interconnections at LUMA 38 kV System Projects Monthly Report	Page 5	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	January 28, 2025

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** *Exhibit 1* submitted herein, and **deem** LUMA in compliance with the January 9th Order.

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 28th day of January 2025.



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Exhibit 1

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Report

January 28, 2025



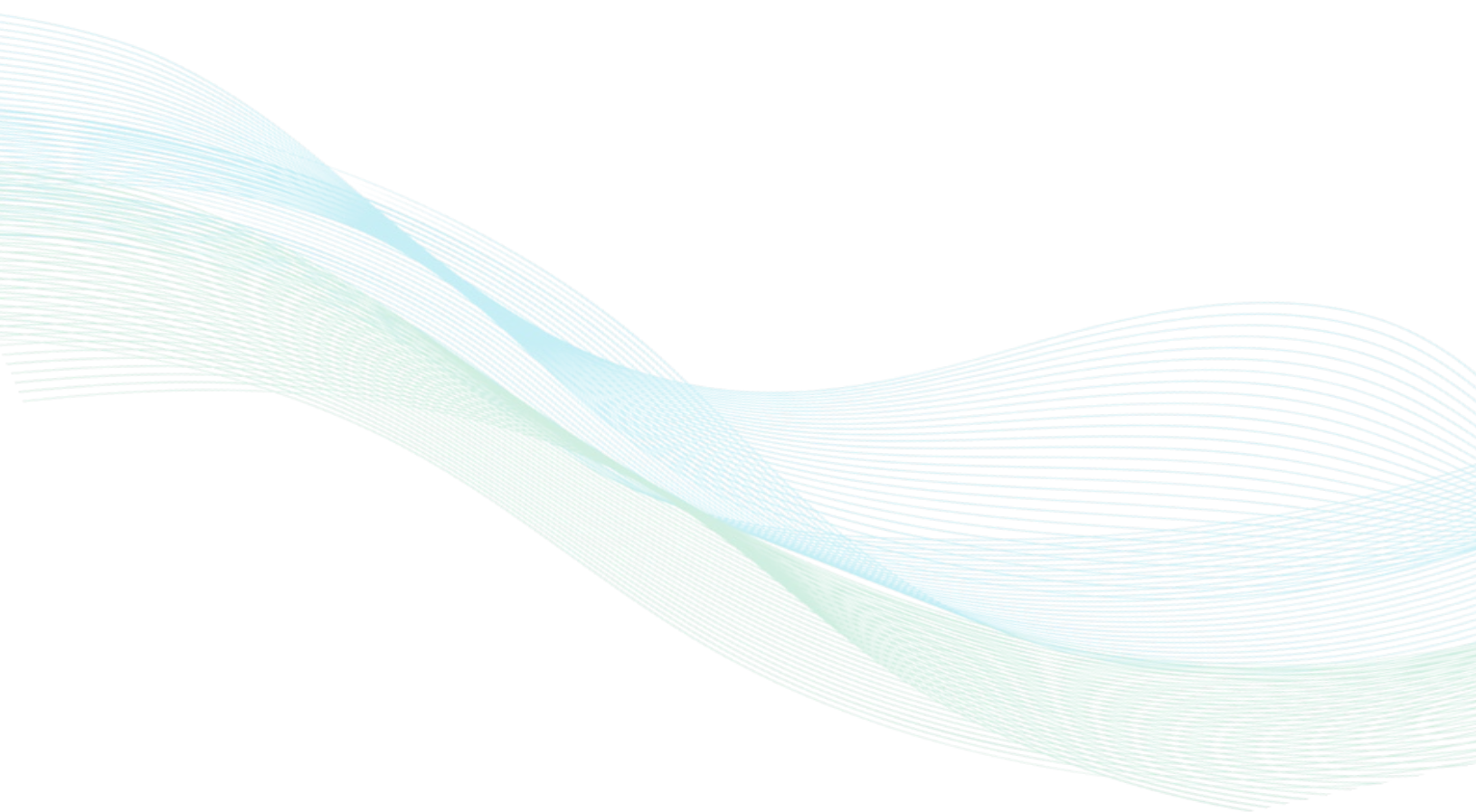
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NEPR-MI-2021-0002

1.0 Introduction

In accordance with the Resolution and Order dated January 14, 2025, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at LUMA 38 kV project schedule, including the following topics:

- i. The locations of the twenty sites studied;
- ii. The four selected sites currently planned;
- iii. The cost to complete the studies of the twenty sites
- iv. Indicate the funds utilized to pay for these studies and the amount spent to date
- v. The reimbursement status of these funds, or if they were advanced by the Federal Emergency Management Administration (FEMA)
- vi. The Detailed Scopes of Work (DSOW) presented to FEMA and the Central Office for Reconstruction, Recovery, and Resiliency (COR3)
- vii. The ROI and LUMA responses to such ROI requested by FEMA and COR3;
- viii. The FEMA Accelerated Awards Strategy (FAAST) number for the project; and
- ix. An updated cost estimate based on the DSOW

This report will focus on the aforementioned items and describe the key activities and progress achieved by LUMA on a monthly basis for the Battery Energy Storage Systems (“BESS” or collectively as the “Project”) approved by the PREB in its Resolution dated August 30, 2023 (“August 30th Resolution”).

2.0 Project Schedule

LUMA has been studying and pursuing the acquisition of multiple sites for the BESS Project. As discussed further below, to maximize its use of federal funds, LUMA needs to ensure that the selected sites enhance the benefits derived from repairs funded by FEMA, which not only entails engaging in technical studies of the technology but also of the 20 proposed sites. Based on the status of our studies and negotiations for the acquisition of the sites, LUMA reasonably expects to submit the DSOWs to FEMA and COR3 no later than the end of May 2025, and will be able to start construction once LUMA receives FEMA's and COR3's approval. Thusly, there has been a change on the estimated time for completion of the Project as shared with the PREB on August 25, 2023. LUMA expects to benefit from more clarity over the estimated completion date for the project once the requisite steps for FEMA project obligation, site and technology analysis, and site acquisitions have been finalized.

3.0 Project Status

3.1 Location of the Sites

The table below details the location of the 20 sites that LUMA explored in order to determine where to target and plan location of the projects.

Table 3-1. Location of Sites

Municipality	Site	Coordinates
Barceloneta	Site 1	
	Site 2	
Aguadilla	Site 1	
	Site 2	
	Site 3	
	Site 4	
San Juan	Site 1	
	Site 2	
	Site 3	
	Site 4	
	Site 5	
Manati	Site 1	
	Site 2	
	Site 3	
	Site 4	
	Site 5	
	Site 6	
	Site 7	
	Site 8	
	Site 9	

3.2 Selected Sites

LUMA has not yet finalized the sites where it intends to deploy the four BESSs but has determined proposed locations across the general areas where the projects are currently planned to be sited: (1) Aguadilla, (2) Barceloneta, (3) Manatí, and (4) San Juan. The studies outlined in Section 3.3 below

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need to be completed and the results analyzed by LUMA's management team before finalizing the site selection. LUMA will supplement its response as final selections are made and real estate detail finalized.

3.3 Projects Cost

3.3.1 Cost to Complete Studies of the Twenty Sites

LUMA has general feasibility studies for 20 sites in order to determine where the four BESS could be deployed. Sites were scouted and evaluated based on the needs of the T&D System for reliability, and other technical characteristics such as: interconnectivity with the 38 kV system (estimated distance from a substation and sub-transmission lines), amount of land needed, flood zone, zoning and land classifications, cost of land (sample sale values), archeological, geotechnical or environmental constraints (example: Primary Farmland classifications, karst zone, sink holes), land availability and ownership. All evaluations were made compliant with Act 83 of 1941, Act 12 of 1903, Act 235 of 2014 and PREPA's Regulation 6955.

The costs associated with those internal reviews are not included in the total as LUMA did not establish a separate task order to track those specific costs. LUMA intends to seek reimbursement from FEMA for the cost of the studies once the Project is approved. The following studies were performed in the four pre-selected sites:

- (1) Environmental Reviews: \$51,200.00
- (2) Power Flow Analyses: \$2,654.46
- (3) Soil Resistivity Tests: \$34,829.45
- (4) Topographical Land Survey: \$108,487.35

Furthermore, LUMA expects to spend \$200,000.00 to conduct boring tests and \$120,000.00 to conduct Phase 1 Environmental Studies in order to finalize its site selections.

3.3.2 Funding Utilized and Amount Spent to Date

- LUMA has spent approximately \$2,353,454 million on this project to date.

3.3.3 Reimbursement Status

- FEMA will provide funds to LUMA once it has submitted a DSOW and FEMA has approved it. Moreover, FEMA has not designated this Project for receiving advanced funds.

3.4 Detailed Scope of Work

LUMA continues to prepare the DSOWs for the Project to FEMA as analysis of the selected sites and corresponding detail is finalized. Once the DSOW is completed, LUMA intends to submit the Project to FEMA as a hazard mitigation project (Section 406) under section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act¹. LUMA intends to submit the Project primarily as a Section 406 project to preserve funding to execute repairs on the transmission and distribution system (T&D System).

¹ Public Law 93-288, as amended, 42 U.S.C. §§ 5121 *et. seq.*

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In order to meet the requirements for Section 406 treatment, LUMA must (1) demonstrate the hazard mitigation benefits of the FEMA-funded repairs to the T&D system and (2) identify precise locations for the deployment of the BESSs in order for FEMA and COR3 to execute the necessary environmental and historical preservation reviews.

Since receiving the August 30th Resolution, LUMA has diligently worked on developing engineering strategies that will benefit Puerto Rico and maximize the benefits of the FEMA-funded repairs. To that end, LUMA is exploring how batteries can help provide N-1 contingencies in line with the North American Electric Reliability Corporation's (NERC) standards. Moreover, LUMA is determining what benefits may be derived from incorporating the BESSs into a microgrid with sufficient distributed generation

3.5 Requests of Information

LUMA has not received any requests for information ("RFI") from either FEMA or COR3.

3.6 FAASt Number

As indicated in Section 3.2 above, LUMA has identified four areas where it intends to site the projects. The FEMA FAASt numbers for the four BESS projects are:

Table 3-3. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	738671
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503

3.7 Updated Project Cost

An updated cost estimate based on the DSOW is not available yet. Once the DSOWs are submitted to FEMA and COR3, we will provide the Class 3 cost estimates for the projects.