

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

**NEPR**

**Received:**

**Mar 10, 2025**

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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:** Motion to Submit the Monthly  
BESS Progress Report for February 2025 in  
Compliance with the Resolutions and Orders  
Dated February 1, 2024, and April 23, 2024.

**MOTION TO SUBMIT THE MONTHLY BESS PROGRESS REPORT FOR JANUARY  
2025 IN COMPLIANCE WITH THE RESOLUTIONS AND ORDERS DATED  
FEBRUARY 1, 2024, AND APRIL 23, 2024**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsels of record, and respectfully submits and prays as follows:

1. On February 1, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order titled *Determination on GENERA’s November 21 Motion Submitting Response in Compliance with the Resolution and Order Dated November 8, 2023, and Requesting a Time Extension to Provide the Detailed Scope of Work per Site* (“February 1<sup>st</sup> Resolution”). In the February 1<sup>st</sup> Resolution, the Energy Bureau approved the projects included in Attachment A therein and noted that Genera is required to present these approved projects to the Federal Emergency Management Agency (“FEMA”) and the Puerto

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<sup>1</sup> Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services (as defined in the LGA OMA) provided by Genera under the LGA OMA.

Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”) to finalize their approval process.

2. Additionally, in the February 1<sup>st</sup> Resolution, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA<sup>2</sup>, as well as updates on the development status of the detailed Scope of Works (“SOW”) and the Battery Energy Storage System (“BESS”) Request for Proposals (“RFP”) (“Monthly Progress Report for the BESS Project”).

3. On April 23, 2024, the Energy Bureau issued a Resolution and Order titled *Resolution and Order on Motion to Submit Scope of Work in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on March 28, 2024 and Memorandum of Law in Support of Confidential Treatment of Scope of Work Submitted on March 28, 2024, in Compliance with Resolution and Order dated November 8, 2023, filed by Genera on April 8, 2024* (“April 23<sup>rd</sup> Resolution”). In the April 23<sup>rd</sup> Resolution, pertinent to this motion, the Energy Bureau reiterated to Genera the February 1<sup>st</sup> Resolution regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the Monthly Progress Report for the BESS Project any updated information concerning the locations and MW quantities comprising the total of 430 MW of BESS projects across the full set of nine (9) project locations originally included in the October 27<sup>th</sup> Motion<sup>3</sup> and referenced in Figure 1 of Exhibit A to the March 28<sup>th</sup> Motion<sup>4</sup>.

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<sup>2</sup> LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

<sup>3</sup> See, *In re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan – December 2020*, Case No. NEPR-MI-2021-0002, *Amended Motion for Leave to Submit Amendment to Project and 406 BESSs Initial Scope of Work*, filed by Genera on October 27, 2023 (“October 27<sup>th</sup> Motion”).

<sup>4</sup> See, *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 Scope of Work in Compliance with Resolution and Order dated November 8, 2023*, filed by Genera on March 28, 2024 (“March 28<sup>th</sup> Motion”).

4. In compliance with the February 1<sup>st</sup> and April 23<sup>rd</sup> Resolutions, Genera respectfully submits to the Energy Bureau its Monthly Progress Report for the BESS Project for the month of February 2025 as *Exhibit A* to this motion.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera's Monthly Progress Report for the BESS Project for the month of February 2025, submitted as Exhibit A to this Motion; and **deem** Genera to be in partial compliance with the February 1<sup>st</sup> and April 23<sup>rd</sup> Resolutions.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of March 2025.

**ECIJA SBGB**  
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## CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to the PREPA's counsel, Mirelis Valle Cancel, at [mvalle@gmlex.net](mailto:mvalle@gmlex.net), and Alexis Rivera, at [arivera@gmlex.net](mailto:arivera@gmlex.net); and to LUMA's counsel, Margarita Mercado, at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), and Yahaira De La Rosa, at [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com).

In San Juan, Puerto Rico, this 10<sup>th</sup> day of March 2025.

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez

Exhibit A.  
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

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

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## **BESS Monthly Report**

### ***Cambalache RFP Project Milestone – Important Dates:***

BESS RFP 4826 for installation works was published in December 2024. The events breakdown was accomplished as set out in the December report.

- Proposals were received by February 14, 2025.
- The evaluation committee had meetings and chose two companies for the final stage of evaluation. Meetings with both companies will be held on March 6, 2025.
- The contractor selection will be undertaken on March 15, 2025.
- Contractor should be on site by May 2025.

### ***Vega Baja***

- Lead Abatement works are 50% completed, expected to be finished by March 14, 2025.
- Genera is undertaken the review of all submittals, plans, insurance and all the documentation required.
- As part of the second phase of permits, the “Permiso Unico Incidental” (PUI) application was completed and will be filed after Lead and Asbestos removal works are completed.
- A meeting with the community leaders took place on February 11, 2025.
- A meeting with Emergency Response in Vega Baja took place February 21, 2025.
- RFP for Installation works in Vega Baja was published on January 31, 2025. Proposals should be received by March 17, 2025. Further demolition works are completed can continue the project sequence and start batteries installation.

**Palo Seco**

- In furtherance of an agreement on the Unit Retirement Checklist, Genera and LUMA will have an in person meeting on March 6, 2025.
- Drafting an RFP to be published in March for pre-decommission activities.

**Costa Sur and Aguirre**

- An RFP for civil and structural works was published on January 31, 2025, and March 17, 2025, was set as the deadline to submit proposals. Presentations and site visit were held for both RFP in February 2025.

**Yabucoa**

- *Should have ready an RFP for civil and structural works by March 7, 2025.*

**Interconnection**

- Genera and LUMA executed a MOU to establish the process for handling interconnection payments. To accelerate progress, weekly meetings with LUMA have been conducted. LUMA is currently 70% complete with the system impact study modeling for Cambalache, which has a COD of 2025. Genera has requested a draft version of the study for preliminary review. Additionally, the system impact studies for the Vega Baja, Aguirre, Yabucoa, and Costa Sur package are scheduled for submission by March 2025, as the COD for these sites is set for 2026.

**Permits**

- Genera was required to file a new application form for Rule 13, Elevation Certificate, for the Vega Baja site. The form will be resubmitted to the Planning Board during March 2025.
- The Elevation Certificate is used to document floodplain management compliance for Post-Flood Insurance Rate Map.
- The Rule 13 for Cambalache and Costa Sur will be submitted to the Planning Board in March 2025

***Procurement***

- The FOMB approved the Tesla contract for the supply of BESS on January 28, 2025.
- On January 29, 2025, Tesla and Genera executed the contract to procure the batteries packs.
- Weekly meetings are held with Tesla Project Management Team.
- A Long Terms Service Agreement (LTSA) contract is under evaluation by Genera.