

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

NEPR

Received:

Mar 31, 2025

6:03 PM

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 MARCH 2025 UPDATE TO THE PREPA-LUMA 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 March 2025 update to the PREPA-LUMA 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 March 2025 PREPA-LUMA 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 31st day of March 2025.

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 margarita.mercado@us.dlapiper.com, laura.rozas@dlapiper.com, yahaira.delarosa@us.dlapiper.com, valeria.belvis@dlapiper.com and to Genera PR, LLC through its counsels of record at jfr@sbgblaw.com, and alopez@sbgblaw.com.

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Exhibit 1

March 2025 PREPA-LUMA 90-Day Plan



FEMA



PREPA-LUMA- Genera 90-Day Plan

March 2025



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).

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 three (3) FEMA FAAS^t projects (*DSOWs & 406-Hazard Mitigation Proposals*) to FEMA for review including:
 - South Coast Irrigation District (also referred to as FAAS^t South Coast Irrigation District – Canals) to COR3 and FEMA,
 - Additionally, a version 0 of the project for geotechnical investigations was submitted to COR3 and FEMA.
 - Lajas Irrigation District (also referred to as FAAS^t Lajas Irrigation District) to COR3 and FEMA.
 - Dams Minor Repairs Project to COR3 and FEMA.
 - In the past quarter five (5) 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):
 - Two projects will remain in the resubmission queue until design information becomes available:
 - Guayabal Dam Repair and Mitigation Project (awaiting Task Order approval and designs) and
 - Guajataca Dam (not projected to be advanced for at least two years),
 - Three projects will be resubmitted next quarter, pending design task order approvals:
 - Toro Negro Hydroelectric System,
 - Rio Blanco Hydroelectric System, and
 - Caonillas Hydroelectric Plant No. 1
 - In addition to the previously listed projects PREPA anticipates the resubmission of multiple dredging projects. These submissions will incorporate the relevant EHP information. Priorities will be determined based on the complexity of the project, information available, and cost. Of the projects noted, PREPA anticipates the submission of three (3) DSOWs for Dredging Projects next quarter. The projects that have 30% designs completed or near completion include:
 - Dos Bocas Reservoir Dredging,
 - Caonillas Reservoir Dredging,
 - Guajataca Reservoir Dredging,
 - Garzas Reservoir Dredging,



- Guerrero Reservoir Dredging,
 - Loco Reservoir Dredging,
 - Lucchetti Reservoir Dredging, and
 - Guayo Reservoir Dredging
 - PREPA anticipates the submission of an amendment for one (1) project:
 - IT/OT System Upgrade for: Aguirre Power Plant, Aguirre Combined Cycle, Cambalache, Mayaguez, Costa Sur, San Juan and Palo Seco.
 - PREPA will submit a new project by next quarter:
 - Gasification of Generation San Juan Units 7, 8, 9, 10, and Cambalache 1.
- PREPA will work with FEMA to respond promptly to any outstanding RFIs.
 - This quarter PREPA has responded to an RFI for one project:
 - South Coast Irrigation District – Version 0 – Geotechnical Investigations
 - Two RFIs remain pending and will be assigned once design task orders are approved:
 - Toro Negro Hydroelectric Conveyance System
 - Caonillas Hydroelectric Plant No. 1
- 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,
 - Bi-weekly meetings are held with the US Bureau of Reclamation (USBR) to reengage and coordinate the 30% design phase of the project.
 - Monthly meetings are held with the Puerto Rico Department of Housing (PRDOH or Vivienda).
 - PREPA submitted a Period of Performance Time Extension (POP TE) and Budget Reallocation Request for this project, this past quarter.
 - The POP TE was approved by FEMA.
 - The budget reallocation request is pending an RFI response from PREPA to COR3, corresponding to work performed by USBR and the assistance to be provided by USACE.
 - 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 is still awaiting a final decision on these projects.
- COR3 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 12/30/2024 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, one (1) FAASt EHP RFI responses were provided:
 - South Coast Irrigation District – Geotechnical Studies.
- Geotechnical Studies and information were provided for the following projects:
 - South Coast Irrigation District – awaiting FEMA environmental clearance.
- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
 - Studies were conducted by the engineering team including:
 - Dewatering Tests
 - Borrow Area Studies
 - Development of the project impact list and draft Environmental Assessments
 - Studies that will be completed next quarter include
 - Outlet Works Design
 - Surveys (Utility, Contractor Land Use, Property Boundaries, Outlet Works, and Canal).
 - PREPA received a document recording projected environmental impacts from USBR in September and is developing a draft EA document for Vivienda to revise. PREPA is currently developing a draft EA to submit to Vivienda now that 30% designs were received.
- 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

- 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 (as needed). The task order for USACE technical assistance was approved by FOMB this past quarter. The task order 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.
- 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.
 - Submittals received the previous quarter include 30% designs for:
 - Caonillas Reservoir Dredging,
 - Guajataca Reservoir Dredging,
 - Garzas Reservoir Dredging,
 - Guerrero Reservoir Dredging, and
 - Loco Reservoir Dredging.
 - Expected submittals by next quarter include 30% designs for:
 - Lucchetti Reservoir Dredging,
 - Guayo Reservoir Dredging, and
 - Dos Bocas Reservoir Dredging.
- Guajataca Dam – Project requires specialized skillsets, and management has finalized the evaluation of the contract structure to receive such services from USACE. Technical studies and project design are currently under development.
 - USACE is conducting their geotechnical investigations.
- IT/OT Telecoms was approved by FEMA.
 - The Project Kick-off Meeting was held this quarter. Project is finalizing



design for construction (design-build).

- 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 November of 2024.
 - Final design for the project is ongoing (design-build).

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 Q2 Project Submittal Milestone

Project Information						Project Progress				
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Commencement Date	Anticipated Date Design of Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
1	180723	FAASt - Rio Blanco Hydroelectric System (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Apr-25	Planning & Design	Sep-22	Dec-25	30%	Dec-27
2	436468	FAASt - Toro Negro Hydroelectric Conveyance Canal and Penstock Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Apr-25	Planning & Design	Sep-22	Sep-25	35%	Jun-28
3	334770	FAASt - Guajataca Dam - Permanent Repairs (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Preliminary Studies Soil Investigations Underway	Dec-26	Planning & Design	Feb-24	Dec-28	3%	Dec-31
4	436621	FAASt - Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Jan-25	Planning & Design	Jul-23	Jul-25	25%	Jun-26
5	721184	Guayabal Dam Seismic Retrofit	Dams, Irrigation Channels & Reservoirs	USACE to take on Design	Jun-26	Planning & Design	Sep-22	Dec-27	5%	Jun-30
6	728260	FAASt - Caonillas 1 Hydro System (Hydro)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Mar-25	Planning & Design	Jul-23	Jul-25	30%	Dec-26
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	Sep-25	Planning & Design	Sep-23	Mar-26	35%	Jan-28
8	436467	FAASt - Isabela Irrigation District - Canals (Water Assets - Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW	TBD	Planning & Design	Apr-23	TBD	30%	TBD
9	436462	FAASt - Lajas Irrigation District - Canals (Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Developing DSOW Geotech V0 to come before	Dec-25	Planning & Design	Jun-23	Jun-26	30%	Jun-28
10	334811	FAASt - Dos Bocas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Apr-25	Planning & Design	Dec-22	Feb-26	15%	Dec-28
11	178722	FAASt - Caonillas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Mar-25	Planning & Design	Dec-22	Feb-26	15%	Dec-28
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%	Dec-29

Project Information						Project Progress				
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Commencement Date	Anticipated Date Design of Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
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%	Dec-29
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%	Dec-29
15	334803	FAASt - Loco Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Mar-25	Planning & Design	Dec-22	Jun-25	10%	Dec-27
16	334813	FAASt - Guayo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Apr-25	Planning & Design	Dec-22	Jun-25	10%	Dec-27
17	334773	FAASt - Lucchetti Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	May-25	Planning & Design	Dec-22	Jun-25	10%	Dec-27
18	334771	FAASt - Guajataca Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	May-25	Planning & Design	Jan-26	Sep-25	10%	Dec-30
19	334798	FAASt - Guerrero Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jun-25	Planning & Design	Dec-25	Aug-25	10%	Dec-30
20	334769	FAASt - Garzas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jun-25	Planning & Design	Jan-26	Sep-25	10%	Dec-27
21	746897	BONUS	Dams, Irrigation Channels & Reservoirs	Design SOW Submitted Pending Obligation	Jun-24	Planning & Design	Aug-23	Jun-24	30%	Dec-25
22	725535	FAASt - IT/OT System Upgrade for: Aguirre Power Plant, Aguirre Combined Cycle, Cambalache, Mayaguez, Costa Sur, San Juan and Palo Seco (Telecommunication)	Generation	Final design for design-build contract. Amendment to be submitted	Mar-25	Planning & Design/Construction	Dec-22	Jun-25	85%	Jun-26
23	TBD	FAASt Gasification of San Juan Units 7, 8, 9, 10 and Cambalache 1	Generation	Design pending	Apr-25	Planning & Design	Nov-24	Jun-25	20%	Dec-26
*All project Construction Dates Assume a NEPA review process of no longer than 6 months										