

**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

SUBJECT: Motion to Submit the Monthly
BESS Progress Report for March 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 MARCH
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”),¹ 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 1st Resolution”). In the February 1st 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

¹ 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 1st Resolution, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA², 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 23rd Resolution”). In the April 23rd Resolution, pertinent to this motion, the Energy Bureau reiterated to Genera the February 1st 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 27th Motion³ and referenced in Figure 1 of Exhibit A to the March 28th Motion⁴.

² LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

³ 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 27th Motion”).

⁴ 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 28th Motion”).

4. In compliance with the February 1st and April 23rd 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 March 2025, submitted as Exhibit A to this Motion; and **deem** Genera to be in partial compliance with the February 1st and April 23rd Resolutions.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of April 2025.

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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, and Alexis Rivera, at arivera@gmlex.net; and to LUMA's counsel, Margarita Mercado, at margarita.mercado@us.dlapiper.com, and Yahaira De La Rosa, at yahaira.delarosa@us.dlapiper.com.

In San Juan, Puerto Rico, this 9th day of April 2025.

/s/ Jennise M. Alvarez González
Jennise M. Alvarez González

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

BESS Monthly Report

Cambalache RFP Project Milestone – Important Dates:

The RFP 4826 for BESS installation works was published in December 2024. The events breakdown was accomplished as set out in this March 2025 report.

- Notice of Award issued to RGE on March 22, 2025
- Contract negotiations are underway, with draft redlines currently under review.
- Weekly preconstruction meetings are being held with RGE
- Site visit for Interconnection Facility studies was conducted with LUMA on March 25, 2025.
- The Interconnection Impact Study is approximately 95% complete, with the final report expected in April 2025.
- RGE contractor should be on site by May 2025.

Vega Baja Plant

- Lead Abatement works are 90% completed and are expected to be finished by April 14, 2025.
- **RFP 4898 / EVENT 229767 – Proposals for the 49 MW Battery Energy Storage System** were submitted on March 28, 2025.
- The evaluation committee for RFP 4898 has been selected.
- On March 25, 2025, LUMA's personnel visited the site to gather information to perform the Interconnection Facility studies.
- Transformer studies were conducted by Beta Electric from March 26–28, 2025
- The transfer of diesel fuel from Vega Baja to Palo Seco plant is expected to be completed by April 2025.
- LUMA has scheduled works to relocate telecom infrastructure by April 3, 2025.

Palo Seco plant

- The RFI 00047 was submitted to LUMA requesting information needed to complete the final scope of work as determined during the site visit held on March 5, 2025.
- An RFP for pre-decommissioning activities was published in March 2025.

Costa Sur and Aguirre Plants

- An RFP for Civil and Structural Works was published on Jan 31, 2025.
 - Costa Sur RFP 4899 / EVENT 229757 – CIVIL AND STRUCTURE WORKS FOR 30 MW BATTERY ENERGY STORAGE SYSTEM AT COSTA SUR submission deadline is April 2, 2025
 - Aguirre RFP 4900 / EVENT 229760 – CIVIL AND STRUCTURE WORKS FOR 158 MW BATTERY ENERGY STORAGE SYSTEM AT AGUIRRE submission deadline is April 11, 2025.
- Costa Sur Interconnection Facility studies site visit with LUMA took place on March 26, 2025.
- Aguirre Interconnection Facility studies site visit with LUMA was conducted on March 27, 2025.

Yabucoa

- A presentation for RFP231175 (Genera PR: 40MW Battery Energy Storage System Civil-Structural Installation) was held on April 2, 2025.
- Interconnection Facility studies site visit with LUMA was conducted on March 26, 2025.

Interconnection

- Genera and LUMA executed a Memorandum of Understanding outlining the process for handling interconnection payments.
- Weekly coordination meetings with LUMA have been held to accelerate the process.
- LUMA has completed the system impact study modeling for the Cambalache site. A draft version of the study has been requested to begin review, given the targeted COD in 2025.

- Interconnection packages for Vega Baja, Aguire, Yabucoa, & Costa Sur will be submitted on April 1, 2025, as these sites are scheduled for COD in 2026.
- Interconnection facilities studies were performed from March 25–27 for Cambalache, Vega Baja, Yabucoa, Aguirre, & Costa Sur.

Permits

- An updated Rule 13 application for Vega Baja was submitted to the Planning Board on March 21, 2025.
- The Elevation Certificate, used to document floodplain management compliance for Post-Flood Insurance Rate Map is in process.
- The Rule 13 applications for Cambalache and Costa Sur will be submitted to the Planning Board in April 2025.
- Submission of the PUI permit for Vega Baja is expected in April 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 with Tesla's Project Management Team are ongoing.
- A Long Terms Service Agreement (LTSA) contract is under evaluation by Genera.
- The first payment milestone to Tesla was submitted on March 6, 2025.