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

IN RE: PLAN PRIORITARIO PARA LA ESTABILIZACIÓN DE LA RED ELÉCTRICA	**CASE NO. NEPR-MI-2024-0005** **SUBJECT: Motion to Submit Corrected Exhibit 1 to Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025**

MOTION TO SUBMIT CORRECTED EXHIBIT 1 TO MOTION TO SUBMIT APRIL 2025 MONTHLY COLLABORATIVE REPORT IN COMPLIANCE WITH RESOLUTION AND ORDER OF MARCH 28, 2025

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy Servco, LLC** ("ServCo") (jointly referred to as "LUMA"), through the undersigned counsel, and respectfully state and request the following:

1. Yesterday, April 28, 2025, LUMA filed with the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") a *Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025*, which included, in its Exhibit 1, the status report for April 2025 on the respective progress of LUMA, Genera, LLC and the Puerto Rico Electric Power Authority ("PREPA") with the implementation of the Electric System Priority Stabilization Plan approved by the Energy Bureau by Resolution and Order of March 28, 2025 ("April 28th Exhibit 1").

2. After this submittal, it came to LUMA's attention that, by inadvertence, it had not included in the April 28th Exhibit 1 a letter referenced by PREPA in its "Stabilization Activities" section. LUMA has prepared a corrected version of the April 28th Exhibit 1 which includes the mentioned letter which is attached as Exhibit 1 to this motion. LUMA respectfully requests the

Energy Bureau to substitute the April 28th Exhibit 1 (that is, Exhibit 1 in LUMA's *Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025* filed on April 28, 2025) with the attached Corrected Exhibit 1.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned and **accept Corrected Exhibit 1** herein in substitution of the Exhibit 1 included in LUMA's *Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025* filed on April 28, 2025.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 29th day of April 2025.

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 to Alexis Rivera, arivera@gmlex.net, Mirelis del Valle, mvalle@gmlex.net, and to counsel for Genera to Luis Román Negrón, lrn@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com.

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Corrected Exhibit 1

LUMA, Genera and PREPA's Monthly Report on the Progress of the Electric System Priority Stabilization Plan for April 2025

Monthly Report on the Progress of the Electric System Priority Stabilization Plan

April 28, 2025

Monthly Report on the Progress of the Electric System Priority Stabilization Plan – April 2025

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1.0 Introduction

In accordance with the Resolution and Order ("R&O") dated March 28, 2025, issued by the Puerto Rico Energy Bureau ("Energy Bureau") in Case No.: NEPR-MI-2024-0005 In Re: Electric System Priority Stabilization Plan, LUMA, the Puerto Rico Electric Power Authority ("PREPA") and Genera PR, LLC ("Genera") are required to provide a monthly status report regarding the stabilization activities set forth in the Electric System Priority Stabilization Plan approved therein. LUMA is tasked with filing these reports as a collaborative report. In compliance with the Energy Bureau Resolution dated March 28, 2025 ("March 28th Resolution"), this report outlines the key activities and progress achieved by LUMA, PREPA, and Genera for the Electric System Priority Stabilization Plan.

Monthly Report on the Progress of the Electric System Priority Stabilization Plan – April 2025

2.0 LUMA's Stabilization Activities

In compliance with the Energy Bureau Resolution dated March 28, 2025 ("March 28th Resolution"), this section outlines the key activities and progress achieved by LUMA for the Electric System Priority Stabilization Plan.

Targeted Vegetation Management Program

Please refer to Appendix A for details.

Complete Transmission Line Hardening & Maintenance

- The Transmission Line Maintenance initiative on the 51 selected segments (reliability-based scope) focuses on 51 transmission segments that have been identified, through system reliability data, as requiring targeted intervention. The purpose is to enhance grid performance, reduce outage risk, and extend asset life by addressing aging infrastructure and identified issues. This program is strategically aligned with reliability improvement targets and ensures that critical transmission assets continue to perform safely and efficiently under both normal and extreme conditions. Key activities include:
- Insulation replacement: Removing and replacing damaged or deteriorated insulators to prevent flashovers and ensure proper electrical isolation.
- Hardware upgrades: Replacing worn or obsolete hardware components—such as clamps, brackets, dampers, and fasteners—that are critical for line stability and safe operation.
- Critical pole replacements: Replacing structurally compromised or end-of-life poles (wood or steel) with upgraded structures to improve mechanical integrity and safety.
- Switch repairs and replacements: Repairing or replacing failing or obsolete transmission switches to improve sectionalizing capability and reduce the impact of faults on system performance.
- Corona scanning and hot spot identification: Utilizing advanced scanning technologies to detect corona discharge and thermal anomalies (hot spots) along the transmission line. These diagnostics help prioritize repairs before failures occur.
- Corrective actions on hot spots: Addressing identified hot spots by tightening or replacing faulty connectors, jumpers, or other components contributing to abnormal heat generation or electrical resistance.

Work Completed on the Identified 51 Segments for Fiscal Year 2025 Year to Date:	
Structures Impacted on I&H Replacement	210
Structures Replaced	6
Switches Repaired	2
Switches Replaced	2

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Work Completed on the Identified 51 Segments for Fiscal Year 2025 Year to Date:	
Conductor Replacement	1
Inspections Performed	60
Hot Spots Corrected (P10s and P20s) Stats	33

"ASAP" Utility-Scale Battery Energy Storage System

Standard Offer Agreement Coordination:

- Four standard offer 1 Agreements have been approved by the Energy Bureau, totaling 110 MW of battery energy storage system ("BESS"). Three of these have been approved by the Financial Oversight and Management Board for Puerto Rico ("FOMB"), submitted to the Puerto Rico Public-Private Partnerships Authority ("P3A") by PREPA and are awaiting P3A approval. One of these is still awaiting PREPA approval since February 7, 2025. Once PREPA approves the Standard Offer, it will then be submitted for FOMB approval.
- Four additional Independent Power Producers ("IPPs") have expressed interest in standard offer 1. These standard offers are under development and could total 86 MW.
- Standard offer 2 template has been approved by the Energy Bureau and detailed SOs will be developed after completion of SO1 agreements.

Developer Coordination:

- Sargent & Lundy has been engaged to develop engineering studies. These will include site visits and system impact and facility studies.
- LUMA is performing several analyses to determine how many BESS MW can be charged with current generation and grid capabilities, and thus, how many MW of BESS should be executed immediately and how many should be deferred until later.
- LUMA is exploring an opportunity to expand capacity by distributing the expanded capacity over a longer period of time, while staying within the Point of Interconnection ("POI") capacity limits.
- Agreed Operating Procedures ("AOP") preliminary draft is in progress. Preliminary discussions have been held to determine BESS dispatch strategies, which will be further defined in the upcoming months.
- The Energy Bureau approved the inclusion of ~$3.5 million in the PPCA factor for April to June for the Accelerated Storage Addition Program ("ASAP") in order to cover interconnection costs such as the engineering studies (NEPR-MI-2020-0001 March 28, 2025, R&O).
- LUMA completed a ~two-hour workshop in April with FOMB to go over the ASAP capacity pricing development and clarify Standard Offer questions.

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- LUMA has initiated internal accounting and financial requests to proceed with site visits and engineering studies.
- Development of the ASAP Implementation Program Plan version 1.0.
- Development of the ASAP Program Reporting & Recovery Process version 1.0

Install 4x25 MW Utility-scale BESS

- LUMA has already submitted the Detailed Scope of Work ("DSOW") for Barceloneta and Manatí to the Central Office for Recovery, Reconstruction, and Resilience ("COR3") and received feedback for submission to the Federal Emergency Management Agency ("FEMA"). Aguadilla and San Juan are being aligned based on the feedback received by COR3, and their submission is expected in the coming weeks.
- LUMA has completed drafts for the scopes of procurements for the engineering, procurement, and construction services that will be needed for the execution of the Project. LUMA expects to issue the request for proposal ("RFP") in the first quarter ("Q1") of fiscal year 2026 ("FY2026").

Grid Protection & Control Upgrade Program

Wide Area Protection Coordination Study:

- 230 kV line protection: All the studies have been completed. All the work order packages have been issued. The implementation is 50% complete. One line remains in the west, while seven lines remain in the east.
- 115 kV line protection: All of the studies have been completed. Ten percent of the work order packages have been issued. There has been no implementation to date.
- 38 kV line protection studies for model validation have been completed. Initial studies are focusing on areas surrounding upcoming projects beginning with projects at Cataño and six stations targeted for Gas Insulated Switchgear ("GIS") installations (Llorens Torres, Centro Medico, Tapia, Taft, Rio Grande Estates, and Egozcue). The Cataño recommendations for the 38 kV are planned for June.

Underfrequency load shedding ("UFLS") scheme:

- Remediation is being performed to the existing scheme.
- Eight relay replacements have been identified. Targeting completion of replacements by June 2025.
- A total of 10 work orders for settings changes have been identified; four have been completed and six will be issued by June 1.
- 70 relays require further investigation/troubleshooting.
- Funds assigned from the Non-Federally Funded Capital ("NFC") program.
- Transmission planning studies analyzing the current UFLS scheme are being conducted to provide a recommendation for changes and/or improvements. Frequency studies with recommendations are expected to be completed in May.

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Remote Terminal Unit ("RTU") replacements:

- 192 RTU replacements identified – 170 to be executed under FEMA and 22 with NFC funds.

Group	Planned	In Progress	Energized	Status
FEMA Group 1	23	16	7	Obligated – Scheduled for completion in July 2025. Installation of six RTUs is pending control house roof repairs.
FEMA Group 2	28	28	0	Pending Obligation. Engineering has been completed for this group.
FEMA Group 3	103	0	0	Pending Obligation.
FEMA Group 4	16	0	0	Pending SOW.
NFC FY2025	5	0	5	Completed.
NFC FY2026	10	1	0	One project has completed engineering.
NFC FY2027	7	0	0	
TOTAL	**192**	**45**	**12**	

Dynamic Stability Study and Frequency Control Implementation

LUMA has successfully replicated several past events involving UFLS in the simulation tool Power System Simulator for Engineering ("PSSE") (transmission studies) to assess the model performance in comparison with the actual field performance.

The automatic load shedding schemes implemented via substation and breaker relays have been compared with the model simulation tools to identify discrepancies and develop corrective actions to verify the field settings of relays required to perform UFLS. As part of the review and corrective actions, LUMA has identified components and relays requiring troubleshooting or replacement. LUMA has completed the following actions:

1. Develop an overall table of underfrequency protection performance monitoring.
2. Perform an overall assessment of the UFLS protection equipment at each substation with devices designed to perform UFLS actions.
3. Align UFLS relay load blocks (how much load is planned to be shed at each frequency block) as set in substations with the simulation representation in the PSSE model.

In the next month, LUMA plans to work on the following items:

1. Program design documentation to align on the planned performance required from the UFLS safety net scheme.

2. Update field relays to ensure the planned value of load is shed at each frequency block.

3. Revise the time-load relationships required to improve UFLS scheme performance consistent with the Electric Power Research Institute ("EPRI") recommendations from the June 14, 2024, event report.

In the next three months, LUMA will align with Genera on a plan and schedule for 3rd party services to perform generator testing. The deliverable will be a document for each site that provides verified generator parameters, time constants, gains and controls "as-is" settings to improve the PSSE dynamic models.

Commence Priority Substation Rehabilitation/Rebuild Projects (Phase 1)

- Caguas Transmission Center ("TC") bank 1 115/38 kV transformer: engineering complete; Construction start/finish: March 2025/August 2025
- Santa Isabel TC - 115/13.2 kV 56MVA transformer: engineering complete; transformer installed and energized. Construction start/finish: July 2024/November 2024
- Monacillos TC 115/38 kV Bank 1 transformer: engineering complete; Construction start/finish: September 2024/August 2025
- Monacillos TC 115/38 kV Bank 3 transformer: engineering complete; Construction start/finish: September 2024/October 2025
- Monacilos TC 115/13.2 kV 1346 transformer: engineering complete; Construction start/finish: May 2024/June 2025
- Sabana Llana TC Autotransformer 2 230/115 kV: engineering complete; Construction start/finish: April 2025/December 2025
- Maunabo TC 115/38 kV transformer: engineering status: in progress; Construction start/finish: May 2025/November 2025
- Bayamón TC Autotransformer 115/38 kV: engineering status: in progress; Construction start/finish: February 2025/October 2025
- Bayamón TC Autotransformer 230/115 kV: engineering complete. Installed and energized. Construction start/finish: November2023/July 2024
- Costa Sur Autotransformer 1 230/115 kV: engineering status: in progress; Construction start/finish: January2025/October 2025
- Factor Sectionalizer 38/13.2 kV transformer: engineering status: in progress; Construction start/finish: March 2025/February 2026
- Fajardo Pueblo 2002 transformer replacement: engineering status: in progress; Construction Start/Finish: May 2025/November 2025

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- Hato Rey TC 115/13.2 kV 44MVA transformer: engineering complete; Installed and energized. Construction Start/Finish: August 2024/November 2024
- Guánica TC 115/38 kV transformer replacement: engineering status: in progress; Awaiting Environmental Permitting. Construction Start/Finish: June 2025/November 2025
- Llorens Torres metalclad replacement: engineering status: in progress; Construction Start/Finish: June 2026/December 2027
- Covadonga GIS switchgear: engineering complete; GIS building Roof Repairs Complete Construction Start/Finish: September 2024/November 2025

Complete Interconnection of Approved IPP Utility Scale LUMA Renewable Capacity Addition Solar Generation and Energy Storage

- The interconnection schedule is as follows:
- Xzerta 60 MW 07/27 - *(developer hasn't communicated the construction start)*
    - Ciro 1- 90 MW- connected by August 2025
    - Salinas BESS- 120 MW by November 2025
    - Salinas PV 100 MW by November 2025
    - Ciro 2 PV/BESS - 126 MW Q2 2026 - *(requires developer's updated construction schedule)*
    - Yabucoa (YFN) PV 31.1 MW by August 2026
- Jobos Solar 80 MW by November 2025
- Jobos BESS 110 MW by November 2025

Development of Comprehensive Transmission Plan

- LUMA intends to comply with the filing date.
- Note that on November 2024, LUMA submitted to the Energy Bureau the first interim filing of the Integrated Resource Plan ("IRP") report. This filing included the data required by the IRP Regulation 9021 that includes "the description of the existing transmission and distribution facilities, as well as the existing advanced grid technologies", and provides a description and summary of the transmission system, preliminary studies and findings, for which studies and project recommendations are developed.

Vegetation Clearing Program and Reclamation Efforts

- LUMA has received confirmation that four Group A High-Density projects are all under FEMA review.
- Six hundred miles have been assessed thus far for the program.

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- Seventy-three miles have been cleared thus far for the program.

Priority Substation Rehabilitation/Rebuild Projects (Phase 2)

- LUMA confirms that Catano, Aguirre, Costa Sur and Rio Grande Estates projects have started. Status of" on track" or "not on track" are identified below.
- Larger rebuild projects like Monacillos, Sabana Llana and San Juan Steam Plant have been issued for RFP through the P3A and 3PPO, with proponents submitting bids to accomplish stated rebuild scopes with the proponent's timeline reflective of their cost estimates to perform the scope. These responses were evaluated by P3A and 3PPO. LUMA is requesting clarification of the evaluations. Status and timeline will be updated once more information becomes available.
- Catano 1801: engineering status: in progress. Expected Construction Start/Finish: April 2025/June 2026 (On track)
- Aguirre BKRS T018: engineering complete. (2) 115 kV breakers replaced and energized; 115 kV breaker 40230 is on the pad but awaiting completion of intermediate PAC works for energization; (1) 230 kV breaker installed and energized. (11) 115 kV and (7) 230 kV breakers remain for installation. Expected construction start/finish: March 2023/November 2027 (on track)
- Costa Sur BKRS P001: engineering complete. (3) 230 kV Breakers replaced and energized; 230 kV Breakers 0012 and 0084 replaced and will be energized in April 2025; (8) 230 kV breakers remain for installation. Expected construction start/finish: April 2024/November 2026 (on track)
- EPC Monacillos TC Rebuild: engineering status: Preliminary only as design will be completed by Engineering, Procurement, and Construction ("EPC") contract. Construction Start/Finish: June 2026 (tentative depends on EPC schedule)/ July 2029 (tentative pending EPC bids and schedules)
- EPC Sabana Llana TC: engineering status: Preliminary only as design will be completed by EPC. Construction Start/Finish: June 2026 (tentative depends on EPC schedule)/ July 2029 (tentative pending EPC bids and schedules)
- Centro Medico 1 and 2: engineering status: in progress. Expected Construction Start/Finish: October 2025/October 2027 (on track)
- EPC San Juan SPTC: engineering status: Preliminary only as design will be completed by EPC. Construction Start/Finish: June 2026 (tentative depends on EPC schedule)/ July 2030 (tentative pending EPC bids and schedules)
- Rio Grande Estates 2306: engineering status: Phase I complete; - 38/13.2 kV 33MVA Transformer and breaker Installation underway and will be complete by August 2025 (on track)
- Rio Grande Estates: engineering status: in progress; Pending FEMA obligation. Expected construction start/finish: September 2025/December 2026 (on track)
- Cambalache TC Relocation: engineering status: in progress. Pending FEMA obligation. Expected Construction start/finish: September 2026/January 2028 (not on track to original date - delayed to FY2028)

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- Tapia GIS Rebuild: engineering status: in progress. Expected construction start/finish: October 2025/September 2027 (Not on track to original date - delayed 1 quarter to FY2028)

Inverter Based Resources (IBR)

- On April 2 2025, Energy Bureau consultants hosted a Smart Inverter Working Group ("SIWG") discussion with LUMA, Solar and Energy Storage Association ("SESA"), Inverter Technical Representatives including SunRun and EnPhase. EPRI was also in attendance and shared industry and global trends and experiences in all aspects of Smart Inverter settings, functions, valuation and best practices.
- LUMA held follow-up discussions with SESA and EPRI, as well as adding Interstate Renewable Energy Council ("IREC") to further the discussion and align on the specific Distributed Energy Resource ("DER") settings that are recommended for applicability to the Puerto Rico grid. Aligned positions include the application of Volt/VAR (with discussion around specific set-points), as well as frequency and voltage ride-thru capabilities (still aligning on reconnection values and durations). SESA indicates that Volt/Watt and functions like it may require further alignment and data to determine an aligned recommendation.
- In a positive direction, EnPhase and other inverter vendors identified that they can provide over-the-air updates to inverters in the field to implement settings like Volt/VAR and ride-thru, which would provide a benefit to Puerto Rico customers by ensuring the point-of-interconnection voltage is being regulated, and that these DER systems do not disconnect for reasonably expected events like generation trips.

Enhanced Frequency Regulation and Reserve Practices

- Initial work has begun on developing an AOP document defining how BESS will be dispatched and utilized to minimize load shed events.
- This strategy will involve using BESS to provide ancillary services such as frequency control and time shift use cases which will improve reliability.
- The AOP will be developed and then integrated into System Operations daily procedures and will eventually be integrated with the new Energy Management System ("EMS").

Assessment and Transition to Long-Term Improvement

- An update will be provided at the 24-month mark per the timeline provided in Energy Bureau's R&O.

3.0 Genera's Stabilization Activities

In compliance with the Energy Bureau Resolution dated March 28, 2025 ("March 28th Resolution"), this section includes the description provided by Genera of the key activities and progress achieved by Genera for the Electric System Priority Stabilization Plan. Genera PR made notable progress in the capacity and actual capacity of total generation by executing strategic projects and implementing short - term repairs and maintenance work on various plants and generators. Notwithstanding, the condition and performance of the aging plants has continued to deteriorate over the years. In search for solutions that allows for the system stabilization Genera respectfully submits the following progress update regarding the most recent key initiatives related to the short-term generation repairs, deployment of utility-scale battery energy storage systems, flexible generation projects, and the critical component replacement program.

Short-term Generation Repairs: Aguirre Unit 2

- Following a breakdown in early February, the unit's generator rotor was sent to the General Electric workshop in Mexico for inspection, insulation replacement, repair, and general cleaning. The rotor is expected to be shipped back to Puerto Rico during the week of May 3 and should arrive around May 10, 2025. Rotor installation is scheduled to be completed between May 24 and May 28. Equipment testing and the start-up process are expected to take place during the first week of June. If the generator successfully passes all tests, the unit is scheduled to be placed back into service on June 7, 2025, at an initial capacity of 320 MW.

- The order for the air preheater baskets was canceled due to contractual issues with the supplier. A new order is being processed; however, delivery is expected to take at least six months. Until the new baskets are installed, the unit will operate at 320 MW. Once installation is completed in early 2026, the unit's capacity is expected to increase by at least 60 MW, reaching a total of 380 MW.

Short-term Generation Repairs: San Juan Unit 6

- The repair of the San Juan Unit 6 is expected to be completed, and the unit returned to service, by May 10, 2025 — representing an advancement of three to four weeks ahead of the original schedule. The unit will be placed in service in combustion turbine ("CT") mode, operating at approximately 145–150 MW, due to delays in awarding the steam turbine ("ST") contract to MD&A. Installation of the steam turbine rotor will be completed after the end of the peak season in November 2025. In the interim, fixed bearings and brush-holders will be utilized.

Short- term Generation Repairs Costa Sur 5

- Costa Sur Unit 5 is undergoing environmental repairs, which include the replacement of air preheater baskets, replacement of the airheater trunnion, repair of the gas recirculating fan, replacement of several boiler tube panels, repair of expansion joints and ducts, inspection of the feedwater heaters, and inspection and testing of the NSS transformer. The unit is scheduled to begin the start-up process during the first week of May, with a target date of May 3, 2025.

Short-term Generation Repairs: Palo Seco Unit 4

- The repair of Palo Seco Unit 4 began in August 2023 following a catastrophic generator failure. The unit is currently undergoing major repairs, including work on the generator rotor, air preheaters, ducts,

funnels, and expansion joints. In addition, boiler piping is being repaired, as well as maintenance and repairs on the induced draft and forced draft fans, among other auxiliary equipment. The unit is expected to return to service by mid-July, with a target date of July 19, 2025.

Deployment of 430MW of Utility Scale BESS

- Regarding scheduling, the first batteries scheduled for delivery are for the Cambalache site, originally expected in July 2025. However, a potential Change Order is under evaluation to delay this delivery in order to align with the construction schedule proposed by the contractor. The final delivery date will be adjusted once the Change Order is confirmed. As currently projected, equipment delivery and installation schedules for the sites are as follows: Costa Sur – delivery in Q3 2025 and installation complete by Q1 2026; Palo Seco – delivery in Q2 2026 and installation by Q1 2027; Vega Baja – delivery in Q3 2025 and installation by Q1 2026; Cambalache – delivery in Q3 2025 and installation by Q1 2026; Aguirre – delivery in Q3 2026 and installation by Q1 2027; and Yabucoa – delivery in Q4 2025 with installation completion in Q2 2026.

- In terms of finance, the current contract amount is $533.5 million. The first payment to Tesla, in the amount of $147.5 million, was made in March 2025. The second payment, totaling $116 million, is scheduled for April 2025.

- Additionally, weekly meetings are being held with the Tesla team to address technical and contractual matters, ensuring close coordination and timely resolution of project issues.

Deploy 244 MW of flexible Generation

- Siemens' project progress continues as scheduled. Equipment delivery is anticipated for the second quarter of 2026, with equipment installation expected to be completed by the first quarter of 2027. The current contract amount is $150.3 million. The first payment to Siemens, totaling $67.4 million, was made in January 2025, and the second payment of $63.1 million is scheduled for November 2025. Weekly meetings are being held with the Siemens team to address technical and contractual matters.

- Regarding RG Engineering's progress, equipment delivery is scheduled as follows: Jobos and Yabucoa are expected to receive their equipment in the third quarter of 2026, while Daguao’s delivery is planned for the fourth quarter of 2026. Equipment installation is projected to be completed in the first quarter of 2027 for Jobos, the first quarter of 2028 for Yabucoa, and the second quarter of 2027 for Daguao. It is important to note that these dates are based on the assumption that de-rating can be performed on the equipment at Jobos and Daguao to allow connection to the existing transformers while awaiting delivery of the new transformers. If de-rating is not possible, installation completion dates will need to be adjusted. Similarly, the installation schedule for the equipment in Yabucoa is subject to confirmation of the delivery date for the three-winding transformer, which has not yet been finalized. The current contract amount for RG Engineering is $311.2 million, with the first payment of $160.8 million scheduled for July 2025. The contract was submitted to FOMB for approval on April 18, 2025.

Critical Component Replacement Program

- Critical components for the Costa Sur, Aguirre, Cambalache, San Juan, Palo Seco and Mayaguez power plants have been ordered, RFP awarded or waiting approval from regulatory agencies (P3/FOMB). Estimated deliveries range from mid-2025 to mid-2026 and total cost within the $123 million dollars range. Deliveries and prices might be impacted by the supply chain disruption as a consequence of the imposed tariffs.

4.0 PREPA's Stabilization Activities

In compliance with the Energy Bureau Resolution dated March 28, 2025 ("March 28th Resolution"), this section includes the description provided by PREPA of the key activities and progress achieved by PREPA for the Electric System Priority Stabilization Plan.

Extend the Operation of the Seventeen (17) TM2500 Temporary Generation Units

- On December 31, 2024, FEMA sent a letter to COR3 approving COR3's amendment to Project 11628 (funding and temporary usage of 17 generators) to extend the performance period until December 31, 2027, and requesting approval of an additional $23.8 M for the purchase and installation of additional emission controls. FEMA approved the extension until December 31, 2027.

800 MW of Additional Emergency Temporary Base Generation for Interconnection between Aguirre and Costa Sur

- The due date to file Proposals is April 25, 2025. Analysis of the RFP shall commence tomorrow with the Data Manager. Presently, there are no delays related to this RFP. However, we do note that more Proponents than expected were identified. Therefore, the timeline depends on the analysis of the Proposals. Enclosed is the letter.
- The expected target to sign the Contract with the Selected Proponent is May 2, 2025, as included below in the RFP TIMELINE.
- Below we include the RFP TIMELINE, as included in the RFP (3PPO-0314-20-TPG; Emergency Temporary Power Generation):
- 1. RFP released to Public- Tuesday, March 25, 2025;
- 2. Initial Mandatory Meeting- Tuesday, April 1, 2025;
- 3. Mandatory Site Visits (two for each site)*- Week of April 7-11, 2025
- 4. Q&A Period Deadline, & Signed Confidentiality Submission Due Date Thursday, April 14, 2025;
- 5. Q&A Answers Period Deadline to question(s) submitted- Monday, April 18, 2025;
- 6. Notice of Intent to Bid- Wednesday, April 23, 2025;
- 7. Proposal Submission Due Date- Friday, April 25, 2025;
- 8. Genera and/or 3PPO to issue Notice of Intent of Award to Selected Proponent Wednesday, April 30, 2025; and
- 9. Genera and/or 3 PPO to sign contract with Selected Proponent- Friday, May 2, 2025.

Seek Environmental Waivers to run the three FT8 MOBILEPAC units in Palo Seco on an emergency basis.

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- On March 29, 2025, PREPA requested that Genera certain information related to generation assets and outstanding environmental compliance issues with regulatory agencies. In response, on April 3, 2025, Genera submitted a letter to PREPA addressing environmental matters related to the FT8 MOBILEPAC temporary generation at San Juan and Palo Seco. Genera noted that the permitting process involves complex issues currently being addressed in coordination with the EPA and that it was in the process of gathering information to respond to several EPA inquiries.

- Furthermore, under Section 5.9 (Environmental Health and Safety Matters) of the Legacy Generation Assets Operation and Maintenance Agreement ("LGA O&M Agreement") between PREPA, the Puerto Rico Public-Private Partnerships Authority, and Genera, Genera is responsible for activities related to the generation of Power and Electricity:

- (i) regarding any environmental, health, and safety programs for each of Legacy Generation Assets;

- (ii) coordinate, oversee, and maintain compliance with the Legacy Generation Assets under applicable Environmental Law, and the requirements of Environmental Approval issued; and

- (iii) monitoring emerging federal, state, Commonwealth, municipal, and local Environmental Law.

- Therefore, it is Genera, the entity responsible for the environmental compliance of all Legacy Generation Assets. As such, Genera should provide such information to the Energy Bureau, pursuant to the LGA O&M Agreement.

5.0 Appendix A: Targeted Vegetation Management

Within the March 28th Resolution, LUMA is mandated to develop a comprehensive plan to manage all distribution feeders by June 30, 2027, and to clear all 51 identified 115 kV and 38 kV transmission line segments that account for 75% of transmission-related customer minute interruptions by October 1, 2026.

In its July 19, 2024, filing, LUMA detailed its Transmission Reliability Improvement Plan, which prioritizes inspecting 51 transmission line segments during FY2025 and addressing critical structural repairs, not vegetation repairs. LUMA does have an established vegetation management strategy that prioritizes lines based on criticality, as shown in Table A-1. The table ranks lines by criticality, with #1 being the most critical, where lines ranked #1 through #16 are the 230 kV lines. These 230 kV lines have undergone vegetation remediation, are on the first maintenance cycle (listed as “Active”) and will be maintained on a 3-year cycle.

LUMA has recently completed the following planned preventative vegetation work on 115 kV lines during FY2025:

- L37400 Dos Bocas – Cambalache TC: 13 spans cleared, segment complete
- L37900 Monacillos TC – Sabana Llana TC: 17 spans cleared, segment complete
- L36400 Ponce TC – Dos Bocas: 68 spans cleared, segment complete.

Additional preventative work is scheduled for Q4 FY2025 on the following critical 115 kV lines:

- L37700 Palo Seco – Bayamon TC
- L37600 Palo Seco – Bayamon TC
- L38700 Palo Seco – San Juan Power Plant
- L38600 Bayamon TC – San Juan Power Plant
- 38200 Palo Seco – Monacillos TC
- 36100 Baymano TC – Monacillos TC
- L40100 Aquirre PP – Jobos PP
- L40200 Aquirre PP – Jobos PP
- L37100 Acacias TC – San German TC
- 39000 Monacillos TC – Aquas Buenas GIS

Corrective work on 38 kV lines will target 33 segments in FY2025 and FY2026, covering approximately 237 miles across all regions. To date:

- 9 segments have been completed, equating to approximately 14 miles of cleared spans

LUMA’s distribution operation teams aim to complete corrective work on 125 circuits across all regions during FY2025. Progress by region includes:

- Arecibo: 21 circuits planned – 10 complete, 5 in progress
- Bayamon: 18 circuits planned – 11 complete, 1 in progress
- Caguas: 22 circuits planned – 8 complete, 4 in progress

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- Mayagüez: 20 circuits planned – 10 complete, 4 in progress
- Ponce: 17 circuits planned – 12 complete, 5 in progress
- San Juan: 27 circuits planned – 13 complete, 4 in progress

Table A-1

Criticality Rank	Voltage	Line	Terminal 1	Terminal 2	Line Miles	Last Complete Date	Target QTR Completed	Budget Year
1	230 kV	50900	Aguirre Power Plant	Aguas Buenas GIS	26.44	1/24/2025	Q4	FY27
2	230 kV	50900	Aguas Buenas GIS	Bayamon TC	12.19	4/3/2023 -Active	Q4	FY25
3	230 kV	51000	Aguas Buenas GIS	Sabana Llana TC	15.70	4/15/2025	Q1	FY28
4	230 kV	51000	Aguirre Power Plant	Aguas Buenas GIS	26.45	1/24/2025	Q4	FY27
5	230 kV	50200	Costa Sur Power Plant	Manati TC	36.78	3/30/2023	Q3	FY26
6	230 kV	51200	Costa Sur Power Plant	Cambalache Power Plant	37.45	9/16/2023 -Active	Q4	FY25
7	230 kV	50100	Cambalache Power Plant	Manati TC	20.07	4/12/2024	Q3	FY26
8	230 kV	50200	Manati TC	Bayamon TC	30.47	6/30/2023	Q2	FY26
9	230 kV	50300	Aguirre Power Plant	Costa Sur Power Plant	41.16	3/11/2023	Q2	FY26
10	230 kV	50400	Costa Sur Power Plant	Mayaguez TC	33.80	3/30/2024	Q3	FY26
11	230 kV	50500	Mora TC	Cambalache Power Plant	25.85	10/3/2024	Q2	FY27
12	230 kV	50500	Mayaguez TC	Mora TC	22.03	10/3/2024	Q2	FY27
13	230 kV	50700	Aguirre Power Plant	AES Power Plant	12.53	7/13/2023 -Active	Q4	FY25
14	230 kV	50700	AES Power Plant	Yabucoa TC	26.99	7/13/2023 -Active	Q4	FY25
15	230 kV	50800	Yabucoa TC	Sabana Llana TC	32.77	9/8/2023	Q2	FY26
16	230 kV	51300	Costa Sur Power Plant	Ponce TC	10.97	3/3/2023	Q3	FY26
17	115 kV	37700	Palo Seco Power Plant	Bayamon TC	4.60	12/20/2022	Q4	FY25
18	115 kV	37600	Bayamon TC	Palo Seco Power Plant	4.73	8/26/2022	Q4	FY25
19	115 kV	38700	Palo Seco Power Plant	San Juan Power Plant	7.04	12/14/2022	Q4	FY25
20	115 kV	38600	Bayamon TC	San Juan Power Plant	5.76	12/20/2022	Q4	FY25
21	115 kV	38200	Palo Seco Power Plant	Monacillos TC	11.09	3/28/2023	Q4	FY25
22	115 kV	36100	Bayamon TC	Monacillos TC	7.42	1/27/2023	Q4	FY25
23	115 kV	38300	Monacillos TC	San Juan Power Plant	4.87		Q1	FY26
24	115 kV	38100	San Juan Power Plant	Viaducto TC	3.50		Q1	FY26
25	115 kV	38400	San Juan Power Plant	Viaducto TC	3.52		Q1	FY26
26	115 kV	40400	San Juan Power Plant	Hato Rey TC	3.29		Q1	FY26
27	115 kV	38500	San Juan Power Plant	Hato Rey TC	3.41		Q1	FY26
28	115 kV	38300	Monacillos TC	San Juan Power Plant	4.87		Q1	FY26
29	115 kV	37400	Hato Tejas TC	Bayamon TC	3.92		Q1	FY26
30	115 kV	37400	Dorado TC	Vega Baja TC	8.99		Q1	FY26
31	115 kV	37400	Dorado TC	Hato Tejas TC	4.82		Q1	FY26
32	115 kV	37400	Vega Baja TC	Manati TC	4.63		Q1	FY26

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33	115 kV	37400	Manati TC	Barceloneta TC	8.72		Q1	FY26
34	115 kV	41300	Cambalache TC	Cambalache PP	1.72	6/16/2023	Q2	FY26
35	115 kV	37400	Barceloneta TC	Cambalache TC	9.78		Q4	FY26
36	115 kV	38900	Berwind TC	Sabana Llana TC	8.39		Q4	FY26
37	115 kV	38900	Martin Pena GIS	Berwind TC	2.76		Q4	FY26
38	115 kV	38900	Hato Rey TC	Martin Pena GIS	8.39		Q4	FY26
39	115 kV	37900	Monacillos TC	Sabana Llana TC	10.69		Q4	FY26
40	115 kV	36700	San Sebastian TC	Mayaguez TC	14.28	10/31/2024	Q1	FY27
41	115 kV	36100	Barrio Pina GIS	Cana Sect	2.98		Q4	FY26
42	115 kV	41500	Bo. Piña TC	Dorado TC	7.38		Q4	FY26
45	115 kV	37800	Cayey TC	Caguas TC	12.48		Q1	FY27
46	115 kV	37800	Cayey TC	Jobos TC	14.43		Q1	FY27
47	115 kV	37800	Caguas TC	Buen Pastor	105.70		Q1	FY27
48	115 kV	37800	Buen Pastor Sect.	Monacillos TC	4.97		Q1	FY27
49	115 kV	37800	Monacillos TC	Buen Pastor Sect.	4.97		Q1	FY27
50	115 kV	39000	Aguas Buenas GIS	Hacienda San Jose		4/7/2025	Q1	FY28
51	115 kV	39000	Hacienda San Jose	Caguas TC		4/7/2025	Q1	FY28
52	115kV	36700	Mayaguez TC	Mayaguez PP	1.31	10/31/2024	Q1	FY27
53	115 kV	37200	Añasco TC	Victoria TC	7.65	1/26/2023	Q2	FY27
54	115 kV	37200	Mayaguez PP	Mayaguez TC	1.63	1/26/2023	Q2	FY27
55	115 kV	37200	Mayaguez TC	Añasco TC	4.87	1/26/2023	Q2	FY27
56	115 kV	36200	Monacillos TC	Juncos TC	21.89		TBD	TBD
57	115 kV	36300	Humacao TC	Yabucoa TC	2.44		TBD	TBD
58	115 kV	40300	Santa Isabel TC	Aguirre PP	13.04	2/17/2023	Q2	FY26
59	115 kV	40300	Pattern Wind Farm	Santa Isabel TC	2.72	2/17/2023	Q2	FY26
60	115 kV	40300	Ponce TC	Pattern Wind Farm	14.85	2/17/2023	Q2	FY26
61	115 kV	36300	Rio Blanco TC	Humacao TC	9.52		TBD	TBD
62	115 kV	39000	Monacillos TC	Aguas Buenas GIS	9.76	Active	Q1	FY28
63	115 kV	41000	Humacao TC	Yabucoa TC	2.44		TBD	TBD
64	115 kV	41400	Juncos TC	Humacao TC	9.76		TBD	TBD
65	115 kV	36800	Canovanas TC	Palmer TC	11.12		TBD	TBD
66	115 kV	36800	Sabana Llana TC	Canovanas TC	9.59	3/10/2023	TBD	TBD
67	115 kV	41200	Sabana Llana TC	Canovanas TC	9.56	3/10/2023	TBD	TBD
68	115 kV	36900	Canas TC	Ponce TC	3.08		TBD	TBD
69	115 kV	36900	Costa Sur PP	Canas TC	8.31		TBD	TBD
70	115 kV	37000	Costa Sur	Ponce TC	11.41	3/3/2023	Q3	FY26
71	115 kV	36100	Dos Bocas Hydro	Barrio Pina GIS	30.50		TBD	TBD
72	115 kV	36200	Fajardo TC	Daguao TC	10.18		TBD	TBD
73	115 kV	37100	San German TC	Guanica TC	13.31		TBD	TBD

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74	115 kV	36100	Morovis Tap	Unibon	3.32		TBD	TBD
75	115 kV	36800	Palmer TC	Fajardo TC	9.66	1/27/2023	TBD	TBD
76	115 kV	36300	Juan Martin TC	Jobos TC	23.27		TBD	TBD
77	115 kV	39000	Barranquitas TC	Comerio TC	7.43		TBD	TBD
78	115 kV	39000	Juana Diaz TC	Toro Negro PP	8.24		TBD	TBD
79	115 kV	39000	Toro Negro PP/Line tap	Barranquitas TC	20.13		TBD	TBD
80	115 kV	39000	Ponce TC	Juana Diaz TC	7.67		TBD	TBD
81	115 kV	39000	Comerio TC	Aguas Buenas GIS	8.23		TBD	TBD
82	115 kV	36200	Daguao TC	Rio Blanco TC	8.37		TBD	TBD
83	115 kV	36200	Rio Blanco TC	Juncos TC	15.16		TBD	TBD
84	115 kV	37100	Acacias TC	San German TC	13.98	Active	Q4	FY25
85	115 kV	37100	Guanica TC	Costa Sur PP	10.68		TBD	TBD
86	115 kV	36300	Yabucoa TC	Shell	4.55		TBD	TBD
87	115 kV	37400	Cambalache TC	Dos Bocas PP	9.08		TBD	TBD
88	115 kV	39100	Cambalache TC	Hatillo TC	6.63	5/31/2023	Q2	FY27
89	115kV	37500	Bayamon TC	Rio Bayamon Sect	2.00		Q4	FY25
90	115 kV	37500	Rio Bayamon Sect.	Monacillos TC	4.44		Q4	FY25
91	115 kV	39100	Victoria TC	Mora TC	9.59	6/9/2023	Q2	FY27
92	115 kV	39800	Mayaguez PP	Acacias TC	13.90	3/30/2024	TBD	TBD
93	115 kV	36300	Shell	Juan Martin TC	0.41		TBD	TBD
94	115 kV	40100	Aguirre PP	Jobos PP	10.96	Active	Q4	FY25
95	115 kV	40200	Aguirre PP	Jobos PP	10.88	Active	Q4	FY25
96	115 kV	36100	Dos Bocas PP	Ciales TC	15.62		TBD	TBD
97	115 kV	38800	Viaducto TC	Hato Rey TC	1.79		TBD	TBD

DHS/FEMA Region 2
One World Trade Center
285 Fulton Street, 52nd Floor
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FEMA

December 31, 2024

Mr. Manuel Laboy
Executive Director
Governor's Authorized Representative
Central Office for Recovery, Reconstruction, and Resiliency, COR3
Commonwealth of Puerto Rico
P.O. Box 42001
San Juan, PR 00940-2001

Dear Executive Director Laboy,

On October 3, 2024, the Government of Puerto Rico's Central Office for Recovery, Reconstruction, and Resiliency (COR3) requested an amendment to Project 11628 to extend the period of performance to December 31, 2027, and to approve an additional $23.8 million for the purchase and installation of additional emission controls.

FEMA approved funding for the acquisition and temporary usage of 17 generators under Project 11628 to enable the completion of permanent work to the generation system funded under Hurricane Maria with the understanding that the scope of work and cost will be amended in the future for reasonable costs if environmental compliance requirements are established in the future. Project 11628 authorizes the temporary use of the generators through December 31, 2025.

Upon obligation of the funding, the Puerto Rico Electric Power Authority (PREPA) only purchased 14 of the 17 generators because the remaining 3 were not available for acquisition. PREPA has since identified an additional 3 temporary generators and negotiated terms for their purchase. PREPA has not proceeded with the purchase due to various issues, one being a concern that it does not have the funding necessary to also purchase and install emissions controls.

In August 2024, the US Department of Justice (DOJ) officially mandated the installation of an oxidation catalyst to each temporary generation unit to ensure compliance with National formaldehyde emission standards as soon as possible. On November 27, 2024, Genera submitted a Prevention of Significant Deterioration (PSD) permit application to the Environmental Protection Agency (EPA). It remains unknown at this time if EPA will require the installation of a Selective Catalytic Reduction (SCR) system when it issues the final PSD permit.

Time Extension

With its request for a time extension, COR3 reiterated the continued need for the temporary power generation while restoration work necessary to increase generation capacity and reliability continues.

COR3 provided both data supporting the need and a current construction timeline for the on-going permanent work. Based on the information provided, the majority of the specific permanent work projects outlined in the request will be completed by December 31, 2027, and at that time the temporary power generation will not be necessary to provide reliable power.

FEMA therefore approves a time extension through December 31, 2027, for the usage of the generators as the temporary power generation will remain critically important to sustain the power grid until the majority of the permanent work outlined is complete, meeting the intent of the initial approval of funding to acquire the temporary generators. This extension will also provide the time necessary (77 weeks) to acquire and install the oxidation catalysts mandated by the DOJ.

We understand that currently Genera will be required by the EPA to limit the operation of the temporary generators to approximately 33% of full capacity if an emergency is not declared by LUMA. With this time extension approval, we would also like to emphasize the importance of the Government of Puerto Rico working in good faith to take all actions necessary to ensure that Genera is in the position to operate all of the temporary generators to 100% capacity to take full advantage of the Federal funding provided to ensure the stability of the power generation system.

Additional Funding

While all emissions controls requirements will not be known until EPA issues the PSD permit, the requirement to install oxidation catalysts exists now and PREPA also wishes to purchase the 3 remaining temporary generators. COR3 therefore requests FEMA amend Project 11628 for $23.8 million for the purchase and installation of oxidation catalysts.

On August 23, 2024, FEMA responded to a prior COR3 inquiry regarding FEMA's commitment to provide additional funding for necessary emissions control. FEMA stated that its commitment to funding emissions controls requirements is limited to reasonable costs. FEMA cannot evaluate the reasonableness of emissions control requirements until all requirements are established and the costs to meet those requirements are known. In its August 23, 2024 letter, FEMA stated that PREPA may use the funding remaining under Project 11628 to purchase and install the required oxidation catalysts or additional temporary generators; however, no additional funding will be provided at this time. It remains unclear whether any additional funding for emissions controls would be deemed reasonable due to the temporary nature of the scope of work of the project and the significant costs of the potentially required emissions controls.

Should you have any additional questions or concerns, please do not hesitate to contact me.

Sincerely,

David Warrington
Regional Administrator
FEMA Region 2