

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

**NEPR**

**Received:**

**Apr 30, 2025**

**5:48 PM**

**IN RE:**

REQUEST FOR APPROVAL OF THE  
VEGA BAJA DECOMMISSIONING  
PLAN

**CASE NO.:** NEPR-MI-2024-0003

**SUBJECT:** Motion to Submit Quarterly  
Progress Report for the Vega Baja  
Decommissioning Plan

**MOTION TO SUBMIT QUARTERLY REPORT FOR THE  
VEGA BAJA DECOMMISSIONING PLAN**

**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 October 31, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Approval of the Vega Baja Decommissioning Plan* ("October 31<sup>st</sup> Resolution"). In the October 31<sup>st</sup> Resolution, the Energy Bureau determined that the decommissioning of the Vega Baja Power Station submitted by Genera aligns with the Approved Integrated Resource Plan ("Approved IRP")<sup>2</sup> and the strategic initiatives for transitioning Puerto Rico's energy infrastructure towards renewable sources.

---

<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, Genera, and the Puerto Rico Public-Private Partnerships Authority ("P3A"), Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

<sup>2</sup> Final Resolution and Order on the Puerto Rico Electric Power Authority's Integrated Resource Plan, *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001, August 24, 2020 ("Approved IRP"). Minor modifications and/or clarifications to the Approved IRP were introduced through a Resolution and Order on Reconsiderations issued by the Energy Bureau on December 2, 2020, in case: *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001.

2. On December 18, 2024, Genera filed a document titled *Motion to Submit the Revised Updated Decommissioning Plan* (“December 18<sup>th</sup> Motion”). Through the December 18<sup>th</sup> Motion, Genera submitted the fully revised Updated Decommissioning Plan incorporating all mandated changes set forth in the December 13, 2024, Resolution & Order. Genera submitted through the December 18<sup>th</sup> Motion the corresponding redlined version, reflecting the changes conducted by Genera’s revision to the Updated Decommissioning Plan.

3. On December 19, 2024, the Energy Bureau issued a Resolution titled *Approval of the Vega Baja Decommissioning Plan* (“December 19<sup>th</sup> Resolution”). Through the December 19<sup>th</sup> Resolution, the Energy Bureau, after reviewing the submitted documents, determined that the Updated Decommissioning Plan dated December 16, 2024, complies with the requirements set forth by the Energy Bureau.

4. In compliance with the December 19<sup>th</sup> Resolution, Genera hereby submits, as Exhibit A to this Motion, the Quarterly Progress Report for the Vega Baja Decommissioning Plan.

**WHEREFORE**, Genera respectfully requests the Energy Bureau to **take notice** of the above for all purposes; **accept** Genera’s Quarterly Progress Report for the Vega Baja Decommissioning Plan, submitted as Exhibit A to this Motion; and **deem** Genera in compliance with the December 19<sup>th</sup> Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 30<sup>th</sup> day of April 2025.

**ECIJA SBGB**  
PO Box 363068  
San Juan, Puerto Rico 00920  
Tel. (787) 300.3200  
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo  
[jfr@sbgblaw.com](mailto:jfr@sbgblaw.com)  
TSPR 9,669

/s/ Jennise M. Alvarez González  
Jennise M. Alvarez González  
[jennalvarez@sbgblaw.com](mailto:jennalvarez@sbgblaw.com)  
TSPR 23,435

### **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.

In San Juan, Puerto Rico, this 30<sup>th</sup> day of April 2025.

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

**Exhibit A**



# Quarterly Progress Report: Genera PR Vega Baja Power Plant

Reporting Period:  
February 19, 2025 – April 18, 2025

Project Site:  
Vega Baja, Puerto Rico

Table of Contents

---

INTRODUCTION..... 3  
KEY MILESTONES COMPLETION ..... 3  
Phase 1: Permitting..... 3  
Phase 2: Pre-demolition..... 4  
BUDGET AND EXPENDITURES..... 5  
DETAILS OF WORK COMPLETED..... 6  
PLANNED ACTIVITIES FOR THE NEXT REPORTING PERIOD ..... 8  
CONFIRMATION OF REGULATORY COMPLIANCE ..... 9  
SUPPORTING DOCUMENTS ..... 9



## INTRODUCTION

Pursuant to Section 11.1 of the Vega Baja Proposed Decommissioning Plan, Genera PR will provide quarterly reports to the Puerto Rico Energy Bureau (PREB) and the Puerto Rico Public-Private Partnerships Authority (P3A). This document presents the First Quarterly Report for the decommissioning of the Genera PR Vega Baja Power Plant. The report provides details of milestones completed, up-to-date expenditures, descriptions of work completed, upcoming activities, and regulatory compliance. All details were structured per the three-phase approach established in the Vega Baja Proposed Decommissioning Plan which are: 1) Permitting, 2) Pre-demolition, and 3) Dismantling, Removal, and Demolition.

## KEY MILESTONES COMPLETION

### Phase 1: Permitting

The following table shows the Vega Baja Plant demolition related permits obtained.

ID	Agency	Permit or Approval	Date Obtained
1	Federal Emergency Management Agency (FEMA), and any other involved federal agencies	NEPA Document Preparation and Approval (Categorical Exclusion expected)	29-APR-2024
2	United States Fish and Wildlife Services (USFWS)	Endangered Species Act (ESA) Section 7 Endangered Species Consultation or Determination of No Effect	17-JUL-2024
3	State Historic Preservation Office (SHPO/OECH)	National Historic Preservation Act Consultation (Section 106)	17-JUL-2024
4	Department of Natural and Environmental Resources (DNER)	Rule 141 - Environmental Impact Documentation	20-NOV-24
5	DNER	Asbestos/Lead Removal Permit	30-JAN-25
6	Federal Emergency Management Agency (FEMA)	Rule 13 – Elevation Certification	28-MAR-25

## Phase 2: Pre-demolition

The following provides a summary of key milestone activities completed as part of phase 2:

- Lead and Asbestos Testing
- Community Engagement
- Ground Penetrating Radar, safety, and physical site surveys
- Notice to Proceed issued on February 19, 2025.
- Site utilities and power grid interconnection were disconnected
- Emergency Generator and other equipment components were removed by Genera
- Main Power Transformer Protection



- First phase of environmental mitigation, lead based paint removal. The project is finalizing the second phase of environmental mitigation, focusing on the removal of remaining lead-containing materials.
- Re-routing of the Telecom fiber.



At the time of this report, no significant deviations from the approved project schedule have been recorded. **The demolition phase remains in scheduled to begin during the week of April 21, 2025.**

## BUDGET AND EXPENDITURES

Phase	Activity	Budget Estimated	Actual cost	Remaining cost
1	Permitting Application Fees	\$123,000.00	\$37,609.67	\$85,390.33
2	Geophysical Survey	\$18,350.00	\$18,350.00	\$0.00
2	Lead & Asbestos Testing (Cost for abatement is not included)	\$20,000.00	\$4,834.00	\$15,166.00
2	Protective Measures, Salvage Work, and Site Disconnections (20% of total decommissioning cost estimate)	\$330,890.00	\$0.00	\$330,890.00
2	Pre-Demolition Activities by Contractor	\$305,000.00	\$114,480.00	\$190,520.00
2	Pre-Demolition Activities by Genera	\$180,691.00	\$0.00	\$180,691.00
2	Contingency (environmental remediation activities, delays, etc.)	\$595,602.00	\$0.00	\$595,602.00
3	Above-Ground Dismantling and Demolition (Does not include costs for abatement and/or disposal of hazardous waste)	\$655,411.00	\$0.00	\$655,411.00
–	Project Management	\$332,000.00	\$0.00	\$332,000.00
<b>Total</b>		<b>\$2,560,944.00</b>	<b>\$175,273.67</b>	<b>\$2,385,670.33</b>

**Note:**

The values shown under Actual Cost for the activity “Pre-Demolition Activities by Contractor” reflect subcontractor invoices that are currently under internal review. These amounts represent costs associated with work already performed, but no payments have been issued as of this reporting period.

**Homeca Recycling Center** submitted two invoices that are under review. The details are as follows:

First invoice: \$40,950.00

Second invoice: \$73,530.00

Retained amount: \$12,720.00

The total amount to be paid corresponding to the invoices is **\$114,480.00**.

Although no expenditure has been recorded yet, all submitted costs are being reviewed and tracked in full compliance with federal funding requirements and internal financial controls. The project team is coordinating closely with the finance and contracts departments to ensure timely payment and proper documentation for all upcoming disbursements.

## DETAILS OF WORK COMPLETED

During this reporting period, the project team executed several key activities in line with the approved decommissioning plan. Below is a summary of the work completed, organized by date and activity type:

### February 20–21, 2025

- Mesh installation was performed in multiple key locations to ensure site perimeter control and compliance with safety requirements:
  - Parking area
  - Gate at Street 2
- Filters were removed and inspected in the UV1-1 storage area, located beneath the main duct.
- Installation of the decontamination unit began, including setting up the interior shower chamber to support personnel decontamination procedures.

### February 24–28, 2025

- Metallic debris surrounding the field was collected, secured in containers, and transported to Homeca Recycling Facilities in compliance with environmental protocols.
- Temporary office and restroom facilities were mobilized and installed on-site to support field operations.
- Abatement Phase I was initiated, focused on the identification and containment of lead-based paint (LBP).

#### March 3–7, 2025

- LBP Clearance – Phase I: All areas under Phase I were inspected and successfully cleared; no exceedances were reported.
- Structure clearance operations were conducted in the main office building and safety office. Partial clearances were also completed in UVB 1-1 and UVB 1-2.
- Lockout/Tagout (LOTO) procedures were performed by Genera PR and Homeca Recycling Center (HRC), under the supervision of Jaime Pesquera and Gilberto Soto from the inspection and administration team.
- An additional six cubic yards of metallic material were removed and transported to Homeca Recycling Facilities.

#### April 2-April 5, 2025

- Protective systems were installed around the main transformer to ensure regulatory compliance and operational safety during the demolition phase.
- Demolition of the Telecom was completed.

#### April 7–13, 2025

- LBP abatement activities continued in the exterior south areas of UVB 1-1 and UVB 1-2, with emphasis on the main duct structures.
- Final protective barriers around the Main Power Transformer-Protection were installed and completed.
- Metal frames surrounding the UVB 1-2 main duct were dismantled and removed.
- Support frames at the Fuel Skid Station and Junction Box were also removed as part of ongoing structural preparation work.

#### April 14–18, 2025

- Abatement Phase II continued through April 15, focused on the remaining lead-based material in structural components.
- Specialized testing and inspections were performed on April 16:
  - Altol Petroleum conducted gauging tests on the three fuel/oil tanks to assess content levels and tank conditions.
  - Innovate Corp performed LBP inspections on the office container, the oil dike and telecom antenna.

**Summary:**

- Final protective barriers around the Main Power Transformer-Protection were installed and completed by April 8.
- The lead abatement process progressed significantly and was expected to be finalized by April 16, with supporting documentation under internal review.
- Coordination with regulatory agencies remained active to ensure continued compliance and prepare for the upcoming certification.
- No significant technical issues were reported. Minor logistical matters were resolved through regular coordination meetings.

**PLANNED ACTIVITIES FOR THE NEXT REPORTING PERIOD**

The following activities are planned for the upcoming reporting period:

- Submission of the PUI (Permiso Unico Incidental) permit.
- Submission and review of the environmental certification request.
- Execution of demolition activities, including:
  - Diesel tank unloading, transfer and transportation to Palo Seco Power Plant.
  - Removal of turbines, breakers, auxiliary compartments, and associated structures.
  - Demolition of tanks and auxiliary systems.
  - Demolition of remaining structural elements, including the concrete structure, office.
- Continued coordination with the utility company and regulatory agencies to ensure alignment and compliance.

**Anticipated challenges:**

- Delays in the environmental approval process due to administrative review timelines.

**Mitigation strategy:**

- Early submission of documentation and proactive follow-up with agencies to minimize potential delays.

## CONFIRMATION OF REGULATORY COMPLIANCE

All project activities during this reporting period were conducted in compliance with applicable federal, state, and local regulatory requirements. Environmental protocols—particularly related to the identification and removal of lead-based materials—were followed as outlined in the approved decommissioning plan.

Health and safety procedures, including Lockout/Tagout (LOTO) measures and transformer protection, were implemented on-site and verified by the project oversight team. Coordination with regulatory agencies remained active to ensure all planned work aligns with permit conditions and reporting obligations.

All critical project documentation—such as environmental clearance reports, safety certifications, and engineering plans—are being uploaded and stored in the Construction Management Software - Procore. This ensures secure, centralized access for stakeholders and supports fully traceability for internal review and future audits.

Notably, during this period:

- Placeholder Community Event was held on February 11, 2025, aimed at engaging local stakeholders and sharing updates on the commissioning plan.
- A meeting with emergency responders was conducted on February 18, 2025; to review the status of battery installation projects and ensure all safety protocols are in place.

## SUPPORTING DOCUMENTS

The following pages include original weekly progress reports submitted by the subcontractor as part of their contractual reporting obligations. These documents contain photographs and activity descriptions prepared and provided directly by the subcontractor.

They are included in this report for documentation purposes and to supplement the narrative of the progress achieved during the reporting period. Please note that the content reflects the subcontractor's account of on-site activities and should be interpreted accordingly.