

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

**NEPR**

**Received:**

**May 8, 2025**

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**IN RE:**

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

**CASE NO.:** NEPR-MI-2021-0002

**SUBJECT:** Motion to Submit the Monthly  
BESS Progress Report for April 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 APRIL 2025  
IN COMPLIANCE WITH THE RESOLUTIONS AND ORDERS DATED FEBRUARY 1,  
2024, AND APRIL 23, 2024**

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

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

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

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

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

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

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

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

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

<sup>4</sup> See, *In re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan – December 2020*, Case No. NEPR-MI-2021-0002, *Motion to Submit Scope of Work in Compliance with Resolution and Order dated November 8, 2023*, filed by Genera on March 28, 2024 (“March 28<sup>th</sup> Motion”).

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

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 8<sup>th</sup> day of May 2025.

**ECIJA SBGB**  
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## CERTIFICATE OF SERVICE

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

In San Juan, Puerto Rico, this 8<sup>th</sup> day of May 2025.

/s/ Jennise M. Alvarez  
Jennise M. Alvarez

Exhibit A.  
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

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

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## **BESS Monthly Report**

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

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

- Notice of Award issued to RGE on March 22, 2025.
- Contract negotiations are in the final stages. Once finalized, the contract will be submitted for final approval to P3 and FOMB.
- Weekly construction meetings with RGE personnel are scheduled to begin on May 7, 2025.
- Interconnection Facility Study report is expected to be received May 30, 2025.
- The Interconnection Impact Study is 100% completed, and the final report has been received and under review. A meeting has been scheduled for May 14, 2025.
- RGE contractor should be on site by June 2025.

### ***Vega Baja Plant***

- Lead Abatement works were completed. PUI Permit has been submitted under permit number **2025-6288-31-PUI-301473**.
- **RFP 4898 / EVENT 229767 – Notice of Award for the 49 MW Battery Energy Storage System project** was issued on April 28, 2025.
- LUMA is undertaking the System Impact Study and Genera expects to receive the report by May 30, 2025. Afterwards, LUMA will start their Facility Study report.
- Beta Electric should complete the Transformer studies report by May 10, 2025.
- The transfer of diesel fuel from Vega Baja to Palo Seco plant is expected to be completed during May 2025.
- LUMA has completed the relocation of the telecom infrastructure.

***Palo Seco***

- A response from LUMA regarding the RFI 00047 was received on April 25, 2025.
- The RFP for pre-decommissioning activities has been put on hold.
- Genera is considering other areas to place the batteries that will not require a future demolition and can accelerate the installation.

***Costa Sur and Aguirre***

- The 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 – A Notice of Award should be issued on May 6, 2025. P A meeting with the contractor is set for the following week to start contract redlines and technical clarifications.
  - Aguirre RFP 4900 / EVENT 229760 – CIVIL AND STRUCTURE WORKS FOR 158 MW BATTERY ENERGY STORAGE SYSTEM AT AGUIRRE, the evaluation committee will meet early May and will issue the Notice of Award the following week.
- LUMA has started the System Impact Study for Costa Sur and is expected to receive the report by May 30, 2025. Once received LUMA will start the Facility Study report.
- Likewise, LUMA has started the System Impact Study for Aguirre and should have the report ready by May 30, 2025, once received LUMA will start their Facility Study report.

***Yabucoa***

- The proposals for RFP231175 (Genera PR: 40MW Battery Energy Storage System Civil-Structural Installation) shall be received by May 16, 2025.
- LUMA has started the System Impact Study expected to received report by May 30, 2025. Once received, LUMA will start their Facility Study report.
- LUMA, Genera, HUB, Project Management team held on April 30, 2025 site visit to discuss relocation of telecom infrastructure.

**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. Report of the study has been received to begin review, given the targeted COD in 2025.
- Interconnection packages for Vega Baja, Aguire, Yabucoa, & Costa Sur have been submitted 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. Reports should be received by May 30, 2025, and after that date the facilities studies report must begin.

**Permits**

- An updated Rule 13 application for Vega Baja was approved on April 2, 2025.
- The Elevation Certificate, used to document floodplain management compliance for Post-Flood Insurance Rate Map is in process.
- Rule 13 applications for Cambalache and Costa Sur were approved on April 24, 2025.
- The PUI permit for Vega Baja was submitted.

**Procurement**

- Weekly meetings with Tesla's Project Management Team are ongoing.
- A Long Terms Service Agreement (LTSA) contract is under evaluation by Genera.
- The second payment milestone to Tesla was submitted on April 18, 2025.