

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

NEPR

Received:

May 28, 2025

2:58 PM

IN RE:

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

CASE NO. NEPR-MI-2021-0002

**SUBJECT: Informative Motion on the Status of
SOW: 4 x 25 MW BESS Interconnections at
LUMA 38 kV System**

**INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS
INTERCONNECTIONS AT LUMA 38 KV SYSTEM**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), through the undersigned legal counsel and respectfully submit the following:

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority (“PREPA”) submit to the Energy Bureau the specific projects to be funded with Federal Emergency Management Agency (“FEMA”) funds or any other federal funds at least thirty (30) calendar days prior to submitting these projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”), FEMA or any other federal agency (“March 26th Order”). It also directed PREPA to continue reporting to the Energy Bureau and FEMA within the next five years, the progress of all ongoing efforts related to the approval of the submitted projects not yet approved by the Energy Bureau. This Energy Bureau thereafter determined this directive applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law*. Therein, LUMA submitted the scope of

work (“SOW”) for the “4 x 25 MW BESS Interconnections at LUMA 38 kV System” transmission and distribution project (“T&D Project”), for the Energy Bureau’s review and approval before submitting it to COR3 and FEMA (“August 25th Motion”).

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order in which it approved the “4 x 25 MW BESS Interconnections at LUMA 38 kV System” T&D Project SOW. It determined that this project was necessary to improve the system’s reliability (“August 30th Order”).

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order in which it ordered LUMA “to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the project” (“January 3rd Order”). *See* January 3rd Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38 kV System* to comply with the January 3rd Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the project until its June 2025 completion date (“January 14th Order”). *See* January 14th Order at 2. The status report should include:

- i) The locations of the twenty (20) sites studied;
- ii) The final four selected sites;
- iii) The cost to complete the studies of the twenty sites.
- iv) Indicate the funds utilized to pay for these studies and the amount spent to date.
- v) The reimbursement status of these funds, or if they were advanced by FEMA
- vi) The DSOW presented to FEMA and COR3;
- vii) The ROT and LUMA responses to such ROT requested by FEMA and COR3;
- viii) The FAAS number for the project; and
- ix) An updated cost estimate based on the DSOW.

See Id.

7. In compliance with the January 14th Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this motion.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** Exhibit 1 submitted herein, and **deem** LUMA in compliance with the January 14th Order.

RESPECTFULLY SUBMITTED.

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 Alexis Rivera, arivera@gmlex.net, and to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfr@sbgblaw.com, Jennise M. Álvarez González, jennalvarez@sgblaw.com, and Francisco Santos, francisco-santos@genera-pr.com.

In San Juan, Puerto Rico, on this 28th day of May 2025.



DLA Piper (Puerto Rico) LLC
500 Calle de la Tanca, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9132
Fax 939-697-6102

/s/ *Yahaira De la Rosa Algarín*
Yahaira De la Rosa Algarín
RUA NÚM. 18,061
yahaira.delarosa@us.dlapiper.com

Exhibit 1

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report

May 28, 2025



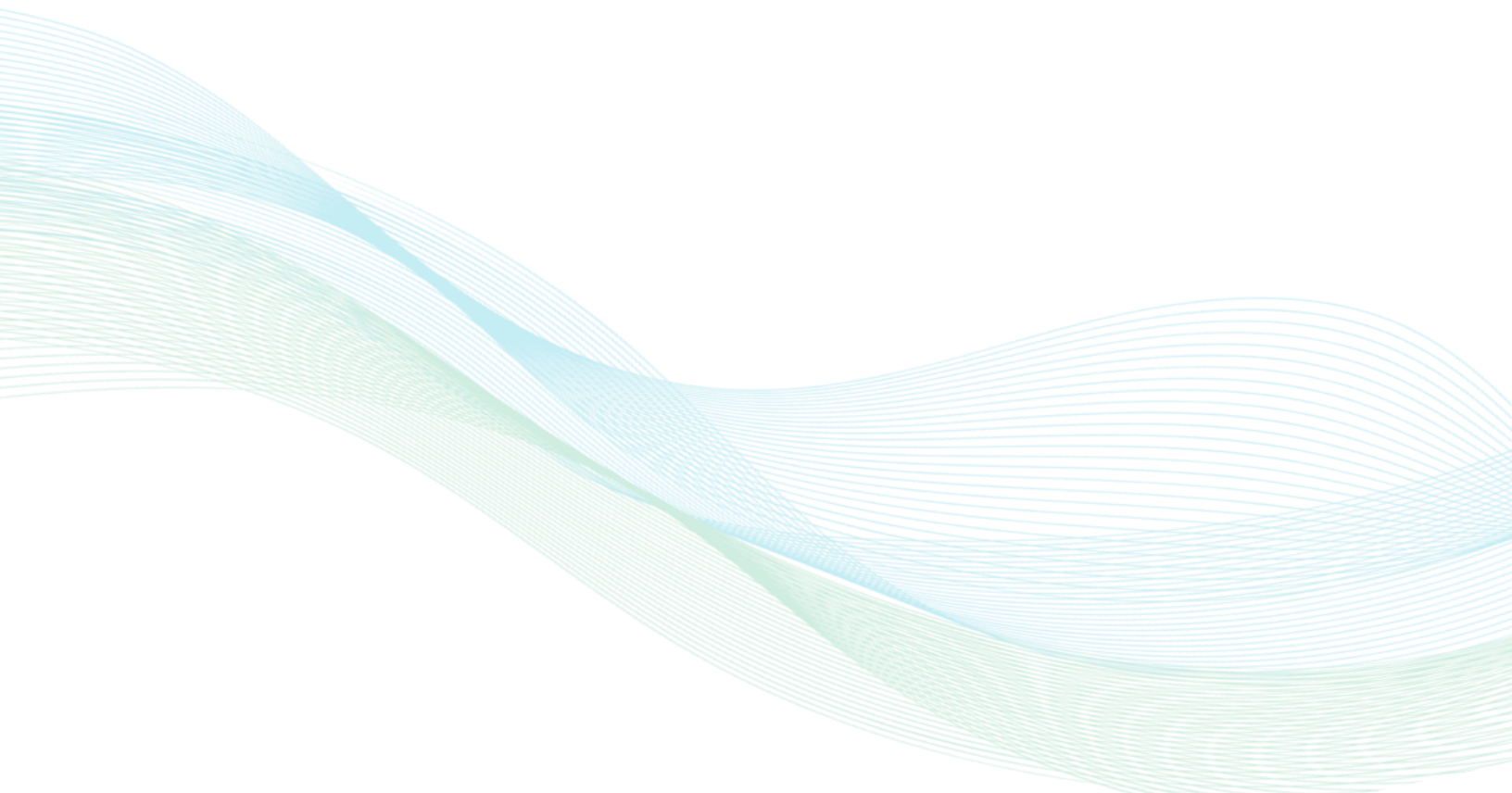
Contents

Tables & Figures.....	3
1.0 Introduction.....	4
2.0 Monthly Status Update.....	4
2.1 Detailed Scope of Work	4
2.2 Procurement.....	4
2.3 Design Status	4
2.4 Project Schedule	4
3.0 Project Status	5
3.1 Selected Sites	5
3.2 Reimbursement Status.....	5
3.3 Requests for Information.....	5
3.4 FAASt Number	5
3.5 Updated Project Cost	6

Tables & Figures

Table 1. FAASt Number..... 5

Table 2. Class 3 Cost Estimate 6



1.0 Introduction

In accordance with the Resolution and Order dated January 14, 2025, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at LUMA 38 kV project. This report focuses on the key activities and progress achieved by LUMA in the past 30 days for the Battery Energy Storage Systems (BESS or collectively as the “Project”) approved by the Energy Bureau in its Resolution dated August 30, 2023 (“August 30th Resolution”).

2.0 Monthly Status Update

2.1 Detailed Scope of Work

On May 7, 2025, the Federal Emergency Management Agency (FEMA) sent LUMA a soft Request for Information (RFI) related to the Manati and Barceloneta detailed scope of work (DSOW). On May 21, 2025, LUMA sent the response to the Central Office for Recovery, Reconstruction, and Resilience (COR3) for their review prior to FEMA.

Furthermore, on May 21, LUMA also sent COR3 the response to the comments related to Aguadilla and San Juan DSOWs prior to submission to FEMA. Once LUMA receives COR3's response, the Aguadilla and San Juan DSOWs will be submitted to FEMA in June 2025.

2.2 Procurement

LUMA has completed drafts for the scopes of procurements for the engineering design and procurement, needed to execute of the Project. LUMA expects to issue the request for proposal (RFP) in the first quarter (Q1) of fiscal year 2026 (FY2026).

2.3 Design Status

The Preliminary Design has been completed. The Detailed Design will be managed by the selected vendor through a competitive procurement process.

2.4 Project Schedule

LUMA has been studying and pursuing the deployment of BESS to multiple locations as part of the Project. LUMA's high-level schedule for this Project includes:

- Procurement - Notice to proceed: January 2026
- Construction Start: January 2027
- Commissioning: December 2027

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

A more detailed schedule will be provided once the funds have been obligated by FEMA and COR3. These dates depend on LUMA being able to procure resources, including equipment, at the expected times.

3.0 Project Status

3.1 Selected Sites

LUMA has not yet finalized the sites where it intends to deploy the four BESSs but has determined proposed locations across the general areas where the projects would be sited. Specifically, these are (1) Aguadilla, (2) Barceloneta, (3) Manatí, and (4) San Juan. LUMA will supplement its response as final selections are made and real estate details are finalized.

3.2 Reimbursement Status

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$47,355.27

3.3 Requests for Information

On May 7, 2025, FEMA sent LUMA a soft RFI regarding the hazard mitigation measures proposed, related to the Manatí & Barceloneta DSOWs. On May 21, 2025, LUMA sent the response to COR3 for their review prior to submission to FEMA.

3.4 FAASt Number

As indicated in Section 3.1 above, LUMA has identified four areas where it intends to site the projects. The FEMA FAASt numbers for the four BESS projects are:

Table 1. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	738671
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

3.5 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta and Manatí DSOWs submitted to FEMA. Once the San Juan and Aguadilla DSOWs are submitted to FEMA, LUMA will provide the Class 3 cost estimates.

Table 2. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate (\$)
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$55,941,767
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$57,640,005