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

IN RE: THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY	**CASE NO.:** NEPR-MI-2019-0007 **SUBJECT:** Motion to Submit Revised Response to January 17th, 2025, ROIs and Initial Response to May 16th, 2025, ROIs, in Compliance with the May 29th Resolution and Order.

MOTION TO SUBMIT REVISED RESPONSE TO JANUARY 17TH, 2025 ROIs AND INITIAL RESPONSE TO MAY 16TH 2025 ROIs, IN COMPLIANCE WITH THE MAY 29TH, 2025 RESOLUTION AND ORDER

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 3, 2025, in compliance with the Energy Bureau of the Puerto Rico Public Service Regulatory Board's Resolution and Order dated January 17, 2025 ("January 17th Resolution"), Genera submitted a *Motion to Submit Response to Request of Information dated January 17, 2025*. With this motion, Genera submitted its responses to the Requests for Information ("ROIs") issued in the January 17th Resolution, along with an updated Quarterly Report for the second quarter of Fiscal Year 2025.

[1] 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 ("P3 Authority"), 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 the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

2. On May 16, 2025, the Energy Bureau issued a Resolution and Order ("May 16th Resolution") determining that, upon reviewing Genera's initial submissions in response to the January 17th Resolution, revised responses were necessary. Consequently, the Energy Bureau ordered Genera to file revised responses to certain ROIs identified in the January 17th Resolution within ten (10) calendar days from notification of the May 16th Resolution.

3. In compliance with the May 16th Resolution, Genera respectfully requested an extension of ten (10) days, that is, until June 5, 2025,—to submit its revised responses , as set forth in Attachment A of the May 16th Resolution.

4. On May 29th, 2025, the Energy Bureau issued a Resolution and Order ("May 29th Resolution) granting Genera's request for extension of ten (10) additional days from the original due date of May 26, 2025—that is, until June 5, 2025—to submit its revised responses to the January 17th Resolution ROIs, as well as the May 16th Resolution ROIs, which are also due on June 5, 2025.

5. In compliance with the May 29th Resolution, Genera respectfully submits its revised responses to the January 17th Resolution ROIs and its initial responses to the May 16th Resolution ROIs as ***Exhibit A*** to this Motion.

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the foregoing for all relevant purposes and **deem** Genera to be in compliance with the May 29th Resolution regarding the submission of the revised responses to the January 17th Resolution ROIs and the initial responses to the May 16th Resolution ROIs as ***Exhibit A*** to this Motion**.**

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of June 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
TSPR 9,669

/s/Jennise M. Alvarez
Jennise M. Álvarez
jennalvarez@sbgblaw.com
TSPR 23,435

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso
jdiaz@sbgblaw.com
TSPR 21,718

CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to margarita.mercado@us.dlapiper.com;Yahaira.delarosa@us.dlapiper.com; mvalle@gmlex.net; arivera@gmlex.net; hrivera@jrsp.pr.gov.

In San Juan, Puerto Rico, this 5th day of June 2025.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/Jennise M. Alvarez
Jennise M. Álvarez

/s/José Javier Díaz Alonso
José Javier Díaz Alonso

Exhibit A

Revised Responses to the January 17th Resolution ROIs and Initial Responses to the May 16th Resolution ROIs

Docket Number: NEPR-MI-2019-0007
In Re: The Performance of the PUERTO RICO ELECTRIC POWER AUTHORITY
Re: Response to January 17th, 2025, ROIs and Initial Response to May 16th, 2025, ROIs, in Compliance with the May 29th Resolution and Order

GPR-PREB-NEPRMI20190007-20250602(1)

(1) Refer to the Resumen Metricas file provided in the January 21 Submission. Genera reported OSHA Recordability Rate, OSHA Dart Rate, OSHA Severity Rate, and OSHA Fatality Rate as a percentage from July 2023 onwards but categorized these metrics as a rate under the "Unit of Measure" tab. Please explain if this is a unit error, if Genera meant to report these metrics as a rate or percentage, and how the reported values should be interpreted. For example, how should a value for OSHA Severity Rate of 0.55% be interpreted?

Response:

Genera PR applies the established guidelines for calculating key safety indicators, including the DART Rate, Severity Rate, Fatality Rate, and Recordable Rate. These methodologies are aligned with recognized standards and is the same methodology used by LUMA.

The methodology used is as follows:

- **DART Rate:** Data is obtained from three sources reported via ADP, incident data provided by Occupational Health Coordinators at each plant (recorded manually), and the active employee list in ADP. The calculation is based on the number of injury and illness cases that result in days away from work:

DART Rate = (Number of Days Away from Work Cases × 200,000) / Total Hours

Worked

(Note: The OSHA scaling factor of 200,000 represents 100 employees working 40 hours per week, 50 weeks per year.)

Severity Rate: Data is gathered from the same three sources (ADP hours, incident logs from Occupational Health Coordinators, and active employee list). The rate is calculated by dividing the total number of lost or restricted workdays reported during the month by the total hours worked, then multiplying by 200,000:

Severity Rate = (Number of Days Lost or Restricted × 200,000) / Total Hours Worked

Fatalities: This data is provided directly by the Human Resources Department via ADP.

Fatality Count = Sum of fatalities reported monthly

Recordable Rate: The data is obtained from ADP-reported hours worked, incident records maintained manually by Occupational Health Coordinators, and the total number of hours worked by employees:

Recordable Rate = (Number of Recordable Injuries and Illnesses × 200,000) / Total Hours Worked

GPR-PREB-NEPRMI20190007-20250602(2)

(2) Refer to the Resumen Metricas file provided in the January 21 and April 25 Submission. Please confirm the value for Monthly thermal generation (by plant) for the Aguirre – Gas plant in December 2024 is correct.

Response:

The value reported for Monthly Thermal Generation for the Aguirre – Gas plant in December 2024, as reflected in the Resumen Métricas file submitted on January 21 and April 25, is correct. During this period, the Aguirre Gas plant units were out of service, which is consistent with the reported generation value.

GPR-PREB-NEPRMI20190007-20250602(3)

(3) Please provide any additional information that would be relevant to the Energy Bureau related to the additional system-level reliability metrics the Energy Bureau intends to add to the reporting template.

Response:

At this time, Genera does not have any additional information to provide regarding the system-level reliability metrics the Energy Bureau intends to incorporate into the reporting template. Genera remain committed to collaborating with the Energy Bureau and will provide any relevant data or analysis once further guidance or definitions for the proposed metrics are available.

GPR-PREB-NEPRMI20190007-20250602(4)

(4) Provide the current methodology Genera is using to calculate the plant availability metric along with relevant workpapers with formulas intact.
Refer to the "Refer to the "GenCo Methodology" tab in the Resumen Metricas file provided in the January 21 and April 25 Submission. Explain if the Unplanned Downtime Hours in the formula for the Plant Availability metrics is the same as Forced Outage Hours in the formula for the Forced Outage metrics. Explain in detail what each category captures, and how they differ, if applicable.

Response:

The current methodology Genera uses for Plant availability is Equivalent Availability (EA) in the following formula:

$$\frac{Available\ Hours\ (AH) - Equivalent\ Outage\ Hours\ (EOH)}{Month\ Period\ Hours} x\ 100$$

See attached "Performance indicators_NEPR" file as workpaper for the month of January 2025**.** The Unplanned Downtime Hours are the same as Forced Outage Hours, but as for respects to the formula, Genera uses Equivalent Outage Hours (EOH), which means the number of hours a unit was involved in an outage, expressed as equivalent hours of full outage at its maximum net dependable capacity as per PJM ISO definition.

GPR-PREB-NEPRMI20190007-20250602(5)

Operational expenses vs. budget and Capital Expenses vs budget calculation methodology:

(5) Genera confirmed that the submitted values reflect a fiscal year to date calculation. However, the Energy Bureau notes that Genera's monthly values seem inconsistent with a fiscal year-to-date calculation. For example, for the "Operational expenses vs. budget (system)" metric, Genera reports values of 91%, 86%, and 98% in July, August, and September 2024, respectively. This is inconsistent with a fiscal-year-to-date calculation for two reasons. First, the Energy Bureau would expect to see this metric increase over time as more expenses are incurred over the course of the year. However, Genera is reporting declining percentages which imply a decrease in cumulative expenses over the course of the year. Second, July is the first month of the fiscal year. Therefore, reported spending of 91% of the annual budget in the first month raises questions about the validity of the calculation methodology.

The Energy Bureau **REQUIRES** Genera to file a revised response explaining the way in which it calculates its finance metrics, and to provide any accompanying workpapers, with formulas intact, necessary to support its response. The Energy Bureau interprets fiscal-year-to-date calculation to mean actual expenditures divided by the approved expenditures for a fiscal year, reported as a fiscal-year-to-date value. In its revised response, **Genera should explicitly state whether it is calculating its budget metrics consistent with the Energy Bureau's interpretation, or if not, explain why not.** Additionally, in its response to the Energy Bureau's question asking whether the calculation methodology for these metrics are consistent with the T&D operational expenses vs budget and capital expenses vs budget metrics, Genera referenced its responses confirming that the methodology is

consistent with the Genco methodology tab and the LGA OMA. The Energy Bureau notes that this is not responsive to its question.

Response:

The variance noted stems from a difference in interpretation of the calculation methodology. Genera's original approach was to compare fiscal year-to-date (YTD) actual expenses against the YTD portion of the budget; this represents how much has been spent relative to how much should have been spent to date.

However, Genera understands that the Puerto Rico Energy Bureau expects the metric to reflect YTD actual expenses as a percentage of the total annual budget, to evaluate cumulative execution relative to the full-year allocation.

Genera acknowledge this difference and will adjust our methodology to align with the Energy Bureau's expectations. The corrected values using the YTD actuals vs total annual budget formula have been updated and highlighted in the attached report.

GPR-PREB-NEPRMI20190007-20250602(6)

Plant availability (system) calculation methodology:

(6) The Energy Bureau asked Genera to explain the difference between the current plant availability metric and Genera's preferred EAF metric. Genera provided broad statements about the appropriate use of the plant availability metrics versus EAF but did not adequately respond to the question of the difference in the calculation methodologies.

The Energy Bureau REQUIRES Genera to file a revised response to the question that appropriately addresses the question of methodological differences. Genera's revised response should explain in detail how it calculates plan availability factor and how it calculates EAF, and how these differ.

Response:

Please refer to response GPR-PREB-NEPRMI20190007-20250602(4).

GPR-PREB-NEPRMI20190007-20250602(7)

OSHA metrics

(7) The Energy Bureau asked Genera if its calculation methodologies for the same metrics for OSHA metrics are consistent with LUMA's calculation methodologies for the same metrics for the transmission and distribution ("T&D") system. Genera stated it follows OSHA guidelines, but did not respond to the question of whether its methodologies are consistent with LUMA's methodologies. The Energy Bureau REQUIRES Genera to file a revised response that appropriately addresses the consistency of its methodology with LUMA's methodology for the T&D OSHA metrics. If necessary, Genera should coordinate with LUMA to ensure its response is accurate.

Response:

Regarding the Energy Bureau's observation of how OSHA metrics were presented in the "Resumen Métricas" file submitted on January 21, Genera PR confirms that the classification of these metrics as "percentages" instead of "rates" was a formatting error in the "Unit of Measure" column.

As of July 2023, Genera PR has consistently reported these indicators following the OSHA-standard formulas. These values are rates, not percentages, and are expressed as a ratio per 200,000 labor hours worked, using the following format:

Rate = (Number of Cases × 200,000) / Total Hours Worked

Therefore, a value reported as 0.55% for the OSHA Severity Rate should be correctly interpreted as a rate of 0.55 cases per 200,000 labor hours worked, not as a percentage.

Genera regret the mislabeling in the unit column and is taking the necessary steps to correct the classification.

GPR-PREB-NEPRMI20190007-20250602(8)

(8) Please provide an explanation for the lack of improvement for the following metrics:

1. Forced outages (by plant)
2. Average heat rate (by plant)
3. Plant availability (by plant and system)
4. MMBTU consumed
5. Average fuel price vs. forced price
6. Fleet out of service

Response:

While there have been fluctuations in certain performance indicators, Genera has made tangible progress in improving the overall reliability and efficiency of the generation fleet. Below is a breakdown of each metric and the key factors influencing their performance:

1. Forced Outages (by Plant):

The average forced outage factor across Genera's fleet has improved by 4% from 2023 to 2025 year-to-date. This progress is largely attributable to the completion of major repairs on Palo Seco Units 3 (PS3), Costa Sur Unit 5 (CS5), and Costa Sur Unit 6 (CS6), which have significantly enhanced unit reliability. However, ongoing generator failures in Aguirre Units 1 and 2 (AG1, AG2) and Palo Seco Unit 4 (PS4) have contributed to elevated forced outage rates at these specific plants. Genera is actively working on the required repairs:

- AG1 is expected to return to service by June 2025.
- PS4 is expected to return to service by July 2025.
- AG2 is undergoing long-term repairs with an expected return to service in July 2026.

2. Average Heat Rate (by Plant):

The average fleet heat rate increased by approximately 800 BTU/kWh. This trend is primarily due to failures in the San Juan Combined Cycle units, which are among the most efficient assets in Genera's portfolio.

- San Juan Unit 5 (SJ5) underwent major repairs and has returned to service.
- San Juan Unit 6 (SJ6) was synchronized in simple cycle mode in May 2025 and is expected to operate in combined cycle mode by December 2025.

Once both units are fully operational in combined cycle mode, a corresponding improvement in the average heat rate is expected.

3. Plant Availability (by Plant and System):

Genera has improved overall fleet availability by 6%. Key contributors to this improvement include the successful completion of major repairs on PS3, CS5, and CS6, which have significantly enhanced unit uptime and reliability.

4. MMBTU Consumed:

Genera request clarification on what specific aspect is being assessed under this metric. A more detailed definition would allow for a more precise explanation.

5. Average Fuel Price vs. Forced Price:

Additional clarification is also requested for this metric. If this refers to the difference between contracted fuel prices and prices paid under emergency or spot market conditions, Genera can provide a more tailored analysis once the intent is confirmed.

6. Fleet Out of Service:

The percentage of fleet units out of service continues to be impacted by long-duration repairs on major units such as AG1, AG2, and PS4. Despite this, Genera has taken proactive steps through its maintenance and reliability improvement programs to reduce overall downtime, and positive trends are expected to continue as units return to service in the coming months.

GPR-PREB-NEPRMI20190007-20250602(9)

(9) Please provide a plan for improvement for the following metrics over the next fiscal year:

1. Forced outages (by plant)
2. Average heat rate (by plant)
3. Plant availability (by plant and system)
4. MMBTU consumed
5. Average fuel price vs. forced price
6. Fleet out of service

Response:

Genera has implemented a comprehensive plan focused on improving all core operational performance metrics since the commencement of operations. This plan includes a structured maintenance program, a critical component replacement schedule, and an aggressive strategy to secure and utilize federal funding to support these activities. The goal of this initiative is to drive sustained improvements in forced outage rates, average heat rate, and plant availability across the generation fleet.

A summary of the plan and associated progress is as follows:

1. Forced Outages (by Plant):

Genera is actively executing its Regular Maintenance and Critical Component Replacement Programs to reduce the frequency and duration of forced outages. These efforts are prioritized based on asset condition assessments and failure history, and they are coordinated closely with LUMA to minimize grid impact.

2. Average Heat Rate (by Plant):

Targeted maintenance activities, such as turbine inspections, boiler tuning, and upgrades, are being implemented to improve unit efficiency. These measures are expected to yield progressive heat rate improvements over the next fiscal year.

3. Plant Availability (by Plant and System):

The integrated maintenance schedule developed in coordination with LUMA outlines planned outages in a manner that optimizes system-wide availability. This approach balances reliability objectives with grid stability and resource adequacy.

4. MMBTU Consumed:

Genera respectfully request clarification on what is specifically being asked under this metric.

5. Average Fuel Price vs. Forced Price:

Similarly, Genera request clarification regarding the terms “average fuel price” and “forced price.”

6. Fleet Out of Service:

Genera monitor the fleet status on a continuous basis and has established reporting tools to track units out of service due to scheduled maintenance or forced outages. The ongoing implementation of reliability initiatives, as reflected in the maintenance schedules, is expected to reduce the percentage of fleet offline at any given time.

For further context, please refer to Genera’s Unit Maintenance Plan, which includes the latest Maintenance Schedule jointly developed with LUMA. This schedule reflects current planning efforts aligned with improving system reliability and generation fleet performance.

Exhibit A-1
(Native file submitted via e-mail)

Exhibit A-2

Reported by	Metric Category	Metric	Sub-Group	Unit of Mea	2024-07	2024-08	2024-09	2024-10	2024-11	2024-12	2025-01	2025-02	2025-03
Genera PR	Finance	Operational expenses vs. budget	System	Percentage	7.41%	14.40%	22.38%	30.40%	38.15%	46.31%	52.86%	59.96%	66.45%
Genera PR	Finance	Operational expenses vs. budget	Labor	Percentage	7.88%	15.20%	22.66%	31.55%	39.10%	46.85%	54.95%	62.17%	69.08%
Genera PR	Finance	Operational expenses vs. budget	Non-Labor	Percentage	7.15%	13.95%	22.23%	29.74%	37.61%	46.00%	51.68%	58.71%	64.96%
Genera PR	Finance	Capital expenses vs. budget	NME	Percentage	2.30%	4.28%	5.66%	10.32%	16.20%	27.13%	36.69%	45.18%	57.45%
Genera PR	Finance	Capital expenses vs. budget	System	Percentage									
Genera PR	Finance	Capital expenses vs. budget	Federally funded	Percentage									
Genera PR	Finance	Capital expenses vs. budget	Non-federally funded	Percentage	2.30%	4.28%	5.66%	10.32%	16.20%	27.13%	36.69%	45.18%	57.45%

Exhibit A-3

UNIT MAINTENANCE PLAN

BOILERS AND TURBO-GENERATORS

June 5, 2025

UNID.	CAP MV	2025 JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	2026 JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SJ CT 5	160							Turbine Inspection																	
SJ STM 5	60																								
SJ CT 6	160					Major Overhau									Outage to install ST Rotor										
SJ STM 6	60														Mayor Overhaul										
SJ 7	100										Major Overhaul														
SJ 9	100																Major Overhaul								
PS 3	216															Env.Maint									
PS 4	216								Generator fault repair + mayor outage environmental													Env.Maint.			
CS 5	410					Baskets & Env.Maint. 9-2025															Env.Maint.				
CS 6	410							Baskets & Env. Maint. 11-2025																	
AG 1	450																			Gen. Rotor failure (Reviending) / AH Basekts				
AG 2	450							Generator Failure Repair and AVR												Enviromental Outage			Env.Maint.		
CC Vap I	96																								
CC Vap II	96																								
Cambalache 2	82																								
Cambalache 3	82																								
Eco CT 1	176								Annual Maint.																
Eco CT 2	176																								
Eco Vap	214																								
AES 1	254																								
AES 2	254															Annual Maint.									

Legend
Current Progress
Planned Maintenace
Forced Outage
TOC provides information