

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

NEPR

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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 Monthly BESS
Progress Report in Compliance with Resolutions
and Orders Dated February 1, 2024, and April
23, 2024

**MOTION TO SUBMIT MONTHLY BESS PROGRESS REPORT IN
COMPLIANCE WITH 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”),¹ 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 1st Order”). In the February 1st Order, 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 Rico

¹ 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.

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

2. Additionally, in the February 1st Order, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA², 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”).

1. On April 23, 2024, the Energy Bureau issued a Resolution and Order reiterating to Genera the February 8th Order regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the report 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 27th Motion. .

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

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of June 2025.

² LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

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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 RegulatoryPREBorders@lumapr.com; margarita.mercado@us.dlapiper.com; laura.rozas@us.dlapiper.com; lionel.santa@prepa.pr.gov; hrivera@jrsp.pr.gov; javrua@sesapr.org; mrrios@arroyorioslaw.com; jordgraham@tesla.com; forest@cleanenergy.org; customerservice@sunnova.com; pjcleanenergy@gmail.com; agraitfe@agraitlawpr.com; info@sesapr.org; cfl@mcvpr.com; and mqs@mcvpr.com.

In San Juan, Puerto Rico, this 10^h day of June 2025.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

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

BESS Monthly Report

Cambalache RFP Project Milestone – Important Dates:

The RFP 4826 for the BESS installation works was published in December 2024. The following milestones have been achieved as of this report:

- The Notice of Award was issued to RGE on March 22, 2025.
- Contract negotiations have concluded, and the agreement has been submitted for final approval by P3 and FOMB.
- Weekly construction coordination meetings with RGE personnel are ongoing.
- The Interconnection Facility Study report is expected to be completed and received in June 2025.
- Discussions are ongoing with LUMA, Tesla, and Genera regarding the Grid Forming approach to meet the Minimum Technical Requirement (MTR) approval.
- Upon contract approval by P3 and FOMB, RGE is expected to mobilize on site by July or August 2025.

Vega Baja Plant

- The PUI Permit was approved on May 20, 2025, 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 currently conducting the System Impact Study and is expected to submit the report to Genera by June 2025. Upon competition, LUMA will begin the Facility Study report.
- Beta Electric completed the draft Transformer Studies report on May 9, 2025.
- The transfer of diesel fuel from Vega Baja to Palo Seco is expected to be completed by June 3, 2025.

- Demolition works at the Vega Baja site are scheduled to be completed by June 18, 2025.
- The second demolition progress report will be submitted to PREB in June 2025.

Palo Seco plant

- Genera is currently evaluating alternative locations for battery installation that would avoid future demolition activities and potentially expedite the installation timeline.
- Multiple project alternatives have been submitted to PREPA for review and approval.

Costa Sur and Aguirre Plants

- The RFP for Civil and Structural Works was published on Jan 31, 2025.
 - **Costa Sur** RFP 4899 / EVENT 229757 – *Civil and Structural Works for the 30 MW Battery Energy Storage System at Costa Sur*
 - A Notice of Award was issued on May 6, 2025.
 - A meeting with the selected contractor was held the following week to develop contract redlines and address technical clarifications.
 - **Aguirre** RFP 4900 / EVENT 229760 – *Civil and Structural Works for the 158 MW Battery Energy Storage System at Aguirre*
 - The evaluation committee met in early May and subsequently issued the Notice of Award.
 - Weekly meetings are being held to review technical clarifications and finalize contract redlines.
 - The P3 and FOMB contract approval packages are prepared and ready for submission upon contract finalization.
 - **LUMA Interconnection Studies:**
 - LUMA has commenced the System Impact Study for both Costa Sur and Aguirre. Reports are expected by June 2025.
 - Upon completion of the System Impact Studies, LUMA will proceed with the respective Facility Studies.

Yabucoa

- Proposals for RFP 231175 (Genera PR: 40MW Battery Energy Storage System Civil-Structural Installation) were received on May 16, 2025.
- LUMA has initiated the System Impact Study, with the report expected by June 2025. Upon receipt, LUMA will proceed with the Facility Study report.
- The Evaluation Committee is scheduled to meet on June 12, 2025, to complete the awarding process.

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. The report has been received and is currently under review, given the targeted COD in 2025.
- Interconnection packages for Vega Baja, Aguirre, 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 are expected by June 2025. Upon receipt, the Facilities Studies phase will begin.

Permits

- The PUI permit for Vega Baja was approved.

Procurement

- Weekly meetings with Tesla's Project Management Team are ongoing.
- A Long Terms Service Agreement (LTSA) contract is under evaluation by Genera.