

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

NEPR

Received:

Jun 30, 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

MOTION TO SUBMIT PREPA'S JUNE 2025 UPDATE TO THE PREPA-LUMA 90-DAY PLAN

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its counsel of record, and respectfully submits and prays as follows:

1. On March 26, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") entered a Resolution and Order (the "March 26 Order") requiring PREPA to, among other things, "continue reporting to the Energy Bureau and FEMA, within the next five (5) years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau".

2. On July 15, 2021, LUMA Energy, LLC and LUMA ServCo, LLC ("LUMA") submitted before this Energy Bureau a document titled *Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed during the Technical Conference* ("July 15th Motion") wherein LUMA proposed, among others, that reporting in this docket be done quarterly and that updates to the 90-Day Plan in

relation to the 10-Year Infrastructure Plan be provided to the Energy Bureau during the last month of every quarter as it is provided to FEMA. See the July 15 Motion on pages 8-9.

3. On September 21, 2021, PREPA and LUMA filed a joint motion titled Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan ("September 21 Motion"). In the September 21 Motion, LUMA and PREPA informed that in the future, they would continue to file the PREPA-LUMA 90-Day Plans instead of 90-Day updates of the 10-Year Infrastructure Plan given that FEMA was only requiring the 90-Day Plans. See the September 21 Motion on page 4.

4. PREPA hereby submits, as Exhibit I to this Motion, the June 2025 update to the PREPA-LUMA 90-Day Plan, including information on areas of coordination among PREPA, LUMA, and Genera PR LLC, focus areas specific to each, and an overview of key next steps for the upcoming 90 days in relation to the 10-Year Infrastructure Plan.

WHEREFORE, PREPA respectfully requests the Energy Bureau take notice of the above and accept the June 2025 PREPA-LUMA 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 30th day of June 2025.

CERTIFICATE OF SERVICE: It is hereby certified that I have filed the foregoing with the Clerk of the Energy Bureau using the electronic filing system using <https://radicacion.energia.pr.gov/login> and also, that I have notified a copy by electronic mail to LUMA Energy, LLC and LUMA Energy ServCo, LLC through their

counsels of record at Yahaira.delarosa@us.dlapiper.com; to Genera PR, LLC through their counsels of record at jrf@sbgblaw.com, jdiaz@sbgblaw.com, jennalvarez@sbgblaw.com, and francisco-santos@genera-pr.com.

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Exhibit I



FEMA



PREPA-LUMA- Genera 90-Day Plan

June 2025



Puerto Rico Electric
Power Authority

CENTRAL OFFICE FOR RECOVERY,
RECONSTRUCTION AND RESILIENCY
COR3





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I. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for Puerto Rico Electric Power Authority's (PREPA) T&D System as outlined within the Operations and Maintenance Agreement (OMA) between PREPA, Puerto Rico Public-Private Partnership Authority (P3A), and LUMA. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and are now the responsibility of LUMA.

On July 1, 2023, GeneraPR assumed overall responsibilities for PREPA's Generation System as outlined within the OMA between PREPA, P3A, and Genera. Upon Commencement of the Service Period, PREPA refocused its efforts on projects in the Dams, Hydro, and Irrigation asset categories; while projects in the Generation asset categories ("Generation Projects") were transitioned to and are now the responsibility of GeneraPR.

This 90-Day Plan provides information on areas of coordination among PREPA, LUMA, and Genera, as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90-Days

The content below summarizes the next steps across the following four areas: 1) Federal Grant Management; 2) Environmental and Historic Preservation (EHP); 3) Engineering Management; and 4) Enterprise Project Management (EPM).

Federal Grant Management

PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3, and FEMA for compliance with EHP requirements.
 - PREPA is working alongside FEMA and COR3 to organize approved SOWs into logical grouping for Project Formulation submissions (*Detailed SOWs*).
 - The logical grouping of SOWs considers EHP limitations to evaluate all environmental impacts under one area.



- PREPA continues to revise *Detailed SOWs* (DSOW) in accordance with FEMA 406-Mitigation and EHP feedback and comments.
 - In the past quarter PREPA (re)submitted a total of two (2) FEMA FAASt projects (*DSOWs & 406-Hazard Mitigation Proposals*) to FEMA for review including and an additional two (2) projects for Version 0 geotechnical designs review:
 - Dams Minor Repairs Project to COR3 and FEMA.
 - Amendment to IT/OT Systems Upgrade for seven (7) plants to COR3 and FEMA.
 - Isabela Irrigation District – V0
 - Lajas Irrigation District – V0
 - In the past quarter five (5) projects remain in the applicant resubmission queue and are awaiting additional information from project designers to advance to the next stage (projects expected for resubmission next quarter are noted):
 - Two projects will remain in the resubmission queue until design information becomes available:
 - Guayabal Dam Repair and Mitigation Project (awaiting Task Order approval and designs) and
 - Guajataca Dam (not projected to be advanced for at least two years),
 - Three projects will be resubmitted next quarter, pending finalization of preliminary studies:
 - Toro Negro Hydroelectric System,
 - Rio Blanco Hydroelectric System, and
 - Caonillas Hydroelectric Plant No. 1
 - In addition to the previously listed projects PREPA anticipates the resubmission of multiple dredging projects. These submissions will incorporate the relevant EHP information. The priorities have been established as listed below based on the complexity of the project, information available, and cost. Of the projects noted, PREPA anticipates the submission of four (4) DSOWs for Dredging Projects next quarter (to be submitted next quarter – TBSNQ). The projects that have 30% designs completed or near completion include:
 - Dos Bocas Reservoir Dredging (TBSNQ),
 - Caonillas Reservoir Dredging (TBSNQ),
 - Guajataca Reservoir Dredging (TBSNQ),
 - Garzas Reservoir Dredging (TBSNQ),
 - Loco Reservoir Dredging,



- Guayo Reservoir Dredging
 - Lucchetti Reservoir Dredging,
 - Guerrero Reservoir Dredging,
- PREPA will work with FEMA to respond promptly to any outstanding RFIs.
 - This quarter PREPA has responded to an for two projects:
 - Dams Minor Repairs Project to COR3 and FEMA.
 - Amendment to IT/OT Systems Upgrade for seven (7) plants to COR3 and FEMA.
 - Two RFIs remain pending and will be assigned once preliminary studies are completed:
 - Toro Negro Hydroelectric Conveyance System
 - Caonillas Hydroelectric Plant No. 1
- FEMA Hazard Mitigation Grant Program (HMGP) and Housing and Urban Development (HUD) funded projects were advanced including overarching components of packages.
 - The grant application process was advanced for Patillas Dam Seismic Retrofit 404/CDBG-Mitigation project, including,
 - Bi-weekly meetings are held with the US Bureau of Reclamation (USBR) to reengage and coordinate the 30% design phase of the project.
 - Monthly meetings are held with the Puerto Rico Department of Housing (PRDOH or Vivienda).
 - PREPA submitted an RFI response for the Period of Performance Time Extension (POP TE) and Budget Reallocation Request for this project, this past quarter.
 - The POP TE was approved by FEMA.
 - The budget reallocation request is pending evaluation from FEMA.
 - PREPA responded to ineligibility reviews from PRDOH for two (2) electrical power reliability and resiliency program (ER2) projects.
 - PREPA responded with a reconsideration letter in August of 2024.
 - COR3 provided a subsequent Program-Based Reconsideration Denial with a 20-calendar day response.
 - PREPA responded to the denial of the following projects:
 - Battery Energy Storage System (BESS) Project
 - New Hydro-Electric Plants Project
 - The decision is awaiting administrative review by an official examiner for one project:
 - Battery Energy Storage System (BESS) Project
 - PREPA is still awaiting a final decision on these projects.
- PREPA anticipated a response from FEMA for the DR-4671 Hurricane Fiona Hydroelectric Projects denial to COR3.



- PREPA will submit progress and financial quarterly reports for the period ending 6/30/2025 on all 428 and 404-obligated projects.

Environmental and Historic Preservation

PREPA Focus Areas

- Complete EHP checklist and documentation requirements for all PREPA projects based on information received by project designers.
- Respond to any EHP RFIs. Two current EHP RFIs are pending response from PREPA including:
 - Toro Negro Hydroelectric System,
 - Caonillas Hydroelectric Plant No. 1
- Geotechnical Studies and information were provided for multiple projects:
 - South Coast Irrigation District
 - Lajas Irrigation District
 - Isabela Irrigation District
- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
 - The current studies are ongoing by the engineering team will be completed by next quarter:
 - Property Boundary Survey
 - Outlet Works Survey
 - Utility Survey
 - ROV Control Tower Investigations
 - Development of the project impact list and draft Environmental Assessments
 - Studies that will be initiated next quarter include:
 - Covered Canal Portion Study
 - Underwater 3D Photogrammetry Scan
 - PREPA received a document recording projected environmental impacts from USBR in September and is developing a draft EA document for Vivienda to revise. PREPA is currently developing a draft EA to submit to Vivienda now that 30% designs, schedule, and cost estimate were received.
- PREPA received endorsements from Puerto Rico Department of Housing (Vivienda/PRDOH) and requested a collaborative relationship between the US Army Corps of Engineers (USACE) and Vivienda for the preparation of the environmental documents to comply with the National Environmental Policy Act (NEPA) for the Patillas Dam Project.
 - Task Order 1 for the Patillas Dam Project has been approved by governing bodies and USACE participation will commence this upcoming quarter.



Engineering Management

PREPA Focus Areas

- Due to the complexity of the water asset projects, PREPA requested technical assistance from USACE in an umbrella MOA to provide support with design, project management, and construction management (as needed). Task Order 2 for USACE technical assistance was signed and approved this quarter, at which point PREPA intends to submit finalized scopes of work for the following projects:
 - Toro Negro Hydroelectric System
 - Rio Blanco Hydroelectric System
 - Caonillas Hydroelectric Plant No. 1
 - Dams Minor Repairs
 - Dredging Projects
- Dredging Projects:
 - A/E design firms were selected for individual projects: CSA and AECOM were the two design firms selected.
 - Planning Phase technical reports were prepared and submitted by the designers to PREPA detailing the project overviews, considerations, and projected alternatives for nine of eleven.
 - As this past quarter 30% designs were received for the following dredging projects:
 - Caonillas Reservoir Dredging,
 - Guajataca Reservoir Dredging,
 - Garzas Reservoir Dredging,
 - Guerrero Reservoir Dredging,
 - Loco Reservoir Dredging,
 - Lucchetti Reservoir Dredging, and
 - Dos Bocas Reservoir Dredging.
 - Expected submittals by next quarter include 30% designs for:
 - Guayo Reservoir Dredging.
 - Based on Task Order 2, PREPA will rely on USACE for constructability and design reviews for these projects.
- Guajataca Dam – Project requires specialized skillsets, and management has finalized the evaluation of the contract structure to receive such services from USACE. Technical studies and project design are currently under development.
 - USACE is conducting their geotechnical investigations.
- IT/OT Telecoms final designs are ongoing (design-build).
 - The project required an amendment to include additional functionality to



the system. These designs are under development and awaiting geotechnical investigations in addition to project amendment approval from FEMA.

- Early Warning System (404 Mitigation Funding)
 - RFP for solicitation of a design/build contractor was issued in early October of 2023.
 - Proponents have been selected to execute design/build. Under contract negotiations.
 - This project has received FOMB approval, and a kick-off meeting was conducted November of 2024.
 - Final design for the project is ongoing (design-build).

Enterprise Project Management (“EPM”)

PREPA Focus Areas

- Continue managing project schedules, tasks, budgets, and progress in PREPA’s system of recording, MS Project Online.
- PREPA will rely on USACE for a master schedule of the projects associated with Task Order 2.
- Continue refining project management controls and artifacts aligned with federal requirements.
- Continuing integration of federally funded projects into PREPA’s EPM program to allow for project management across the entire portfolio, including non-federally funded projects
- Refine MS Power BI reporting dashboards and develop standard reporting at the portfolio level.
- Monitor and manage implementation progress through the EPM program.

III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Water Asset projects *Detailed SOWs* once approved by PREB. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the third quarter of 2025, all of which, but three are Water Asset projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

Table 1.1 – PREPA 2025 Q3 Project Submittal Milestone

<i>Project Information</i>					<i>Project Progress</i>						
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Design Stage Description	Commencement Date	Anticipated Date Design of Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
1	180723	FAASt - Rio Blanco Hydroelectric System (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Aug-25	Planning & Design	30% Designs	Sep-22	Dec-25	30%	Dec-27
2	436468	FAASt - Toro Negro Hydroelectric Conveyance Canal and Penstock Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Aug-25	Planning & Design	30% Designs	Sep-22	Sep-25	35%	Jun-28
3	334770	FAASt - Guajataca Dam - Permanent Repairs (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Preliminary Studies Soil Investigations Underway	Dec-26	Planning & Design	Preliminary Studies	Feb-24	Dec-28	10%	Dec-31
4	436621	FAASt - Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Submitted Mitigation RFI	Jun-25	Planning & Design	30% Designs	Jul-23	Jul-25	30%	Jun-26
5	721184	Guayabal Dam Seismic Retrofit	Dams, Irrigation Channels & Reservoirs	USACE to take on Design	Jun-26	Planning & Design	30% Designs	Sep-22	Dec-27	5%	Jun-34
6	728260	FAASt - Caonillas 1 Hydro System (Hydro)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information	Jul-25	Planning & Design	30% Designs	Jul-23	Jul-25	30%	Dec-26
7	435769	FAASt - South Coast Irrigation District - Canals (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Geotechnical Investigations Ongoing towards final 30% Design Completion	Dec-25	Planning & Design	30% Designs	Sep-23	Mar-26	25%	Jan-28
8	436467	FAASt - Isabela Irrigation District - Canals (Water Assets - Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Geotechnical Investigations to Commence towards final 30% Design Completion	TBD	Planning & Design	TBD	Apr-23	TBD	TBD	TBD
9	436462	FAASt - Lajas Irrigation District - Canals (Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Geotechnical Investigations to Commence towards final 30% Design Completion	Feb-26	Planning & Design	30% Designs	Jun-23	Jun-26	20%	Jun-28
10	334811	FAASt - Dos Bocas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Aug-25	Planning & Design	30% Designs	Dec-22	Feb-26	30%	Dec-28
11	178722	FAASt - Caonillas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Aug-25	Planning & Design	30% Designs	Dec-22	Feb-26	30%	Dec-28

Project Information						Project Progress					
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Design Stage Description	Commencement Date	Anticipated Date Design of Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
12	334772	FAAST - Guayabal Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-26	Planning & Design	30% Designs	Dec-22	Oct-25	10%	Dec-29
13	335206	FAAST - Matrullas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-26	Planning & Design	30% Designs	Dec-22	Oct-25	10%	Dec-29
14	335207	FAAST - Guineo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Jan-26	Planning & Design	30% Designs	Dec-22	Oct-25	10%	Dec-29
15	334803	FAAST - Loco Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 60% Designs	Oct-25	Planning & Design	60% Designs	Dec-22	Jun-25	35%	Dec-27
16	334813	FAAST - Guayo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 30% Designs	Nov-25	Planning & Design	30% Designs	Dec-22	Jun-25	30%	Dec-27
17	334773	FAAST - Lucchetti Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Comments Submitted to Design Team	Oct-25	Planning & Design	30% Designs	Dec-22	Jun-25	30%	Dec-27
18	334771	FAAST - Guajataca Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Sep-25	Planning & Design	30% Designs	Jan-26	Sep-25	30%	Dec-30
19	334798	FAAST - Guerrero Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Sep-25	Planning & Design	30% Designs	Dec-25	Aug-25	30%	Dec-30
20	334769	FAAST - Garzas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Sep-25	Planning & Design	30% Designs	Jan-26	Sep-25	30%	Dec-27
21	746897	BONUS	Dams, Irrigation Channels & Reservoirs	Obligated	Jun-24	Permenant Work Procurement	30% Designs	Aug-23	Jun-24	30%	Dec-25
22	725535	FAAST - IT/OT System Upgrade for: Aguirre Power Plant, Aguirre Combined Cycle, Cambalache, Mayaguez, Costa Sur, San Juan and Palo Seco (Telecommunication)	Generation	Ammendment submitted for completion.	May-25	Planning & Design/Construction	60% Designs	Dec-22	Jun-25	60%	Jun-26
23	TBD	FAAST Gasification of San Juan Units 7, 8, 9, 10 and Cambalache 1	Generation	Design pending	Apr-25	Planning & Design	TBD	Nov-24	Jun-25	TBD	Dec-26
*All project Construction Dates Assume a NEPA review process of no longer than 6 months. Project modifications pending USACE Task 1 from Task Order 2 (schedule)											

