

**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”).

3. On April 23, 2024, the Energy Bureau issued a Resolution and Order reiterating to Genera the February 1st 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.

4. 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 June 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 June 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 July 2025.

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

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/ José Javier Díaz Alonso

José Javier Díaz Alonso

jdiaz@sbgblaw.com

TSPR 21,718

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 10th day of July 2025.

/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:

- Contract negotiations have concluded, and the agreement is pending final approval from P3 and FOMB.
- Weekly construction coordination meetings with RGE personnel are ongoing.
- The Interconnection Facility Study report assumes multiple factors. The COD changes to 2026, will alter the parameters of the study and delay the completion of the report. LUMA will confirm when the report will be finished.
- Upon contract approval by P3 and FOMB, RGE is expected to mobilize on site by July or August 2025.
- Genera is undertaking a structural test to the bridge in route to the plant main entrance.
- The NPDES permit (National Pollutant Discharge Elimination System) required by the Clean Water Act is in process for submittal.
- The Fire Department endorsement for all sites will be submitted, although this is not a permit requirement, Genera thinks it is important to have.
- The transformer studies to the existing GSU will begin as soon as possible.

Vega Baja Plant

- The PUI and Oficina de Gerencia de Permisos (OGP) monthly report has been issued.
- LUMA is currently conducting the System Impact Study and upon completion the Facility Study report will begin.

- Requesting quotes for the generator step up transformer GSU relocation during construction. In addition, a quote for the refurbishment of the existing GSU was provided and Beta Electric will perform the repairs.
- The transfer of diesel fuel from Vega Baja to Palo Seco concluded on June 3, 2025.
- Demolition works at the Vega Baja site were completed on June 26, 2025.
- The second demolition progress report will be submitted to PREB on July 15, 2025.
- The second community engagement meeting took place on June 23, 2025.
- Weekly construction meetings with ARG team are ongoing.

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 location alternatives are under evaluation.
- Preparing scope of works for new soil studies report in alternative locations.

Costa Sur and Aguirre Plants

- **Costa Sur** RFP 4899 / EVENT 229757 – *Civil and Structural Works for the 30 MW Battery Energy Storage System at Costa Sur*
 - All technical clarifications have concluded.
 - Weekly Construction Meetings with RG Engineering team are ongoing.
- **Aguirre** RFP 4900 / EVENT 229760 – *Civil and Structural Works for the 158 MW Battery Energy Storage System at Aguirre*
 - All technical clarifications have concluded.
 - Weekly Construction Meetings with RG Engineering team are ongoing.
- **LUMA Interconnection Studies:**
 - Genera has submitted interconnection applications for Cambalache, Vega Baja, Costa Sur, Aguirre and Yabucoa. (Impact Study / Facility Study).
 - The Cambalache Impact Study Report was received.
 - The remaining sites studies are ongoing.

Yabucoa

- Notice of Award (NOA) was issued on July 2, 2025.
- Request for Clarification (RFC) Meetings will be held on July 10, 2025.
- Coordinations with LUMA, Hub Advance Networks and Genera Telecom for relocation of telecommunications infrastructure as part of the project.

Interconnection

- Genera and LUMA executed a Memorandum of understanding outlining the process for handling interconnection payments. Roles and responsibilities document was shared by LUMA for Genera to comment.
- 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 Interconnection Facility Study report is ongoing COD change to 2026; this will delay the facility study report. LUMA will confirm when the report will be finished.
- Interconnection packages for Vega Baja, Aguirre, Yabucoa, and Costa Sur have been submitted as these sites are scheduled for COD in 2026.
- Interconnection facilities studies were performed from March 25-27, 2025, for Cambalache, Vega Baja, Yabucoa, Aguirre, & Costa Sur. Upon receipt and evaluation, the Facilities Studies phase will begin.

Permits

- The PUI permit reports have been submitted.
- NPDES (National Pollutant Discharge Elimination System) Cambalache
- Fire Department Endorsement (For all Sites)

Procurement

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

- Discussions are ongoing with LUMA, Tesla, and Genera regarding the Grid Forming approach to meet the Minimum Technical Requirement (MTR) approval.
- A request to Tesla for transportation plan for all BESS sites was issued.