

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

**NEPR**

**Received:**

**Jul 20, 2025**

**11:54 AM**

**IN RE:**

**REVIEW OF LUMA'S INITIAL BUDGET**

**CASE NO.:** NEPR-MI-2021-0004

**SUBJECT:** Motion to Submit Reports on Grid Modernization, Emergency Work-Related Federal Funding, and Maintenance and Repair Status in Compliance with Resolutions and Orders Dated June 25, 2023, and June 26, 2024

**MOTION TO SUBMIT REPORTS ON GRID MODERNIZATION, EMERGENCY WORK-RELATED FEDERAL FUNDING, AND MAINTENANCE AND REPAIR STATUS IN COMPLIANCE WITH RESOLUTIONS AND ORDERS DATED JUNE 25, 2023, AND JUNE 26, 2024**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsel of record, and respectfully state and request the following:

1. On June 25, 2023, the Puerto Rico Energy Bureau (“Energy Bureau” or “PREB”) issued a Resolution and Order titled *Determination on the FY24 Annual Budgets for the Electric Utility System – LUMA, Genera, and PREPA* (“June 25<sup>th</sup> Order”), through which it (1) modified the Proposed Consolidated FY2024 Budget; (2) approved the modified budgets subject to compliance with various orders included in the June 25<sup>th</sup> Order; and (3) included a series of determinations and orders addressed to Genera regarding the GenCo Budget.<sup>2</sup>

2. Pertinent to this Motion, the June 25<sup>th</sup> Order included reporting requirements outlined in its Attachment J, comprising but not limited to: (a) implementation of Grid Modernization Plan Report; and (b) permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan Updates.

---

<sup>1</sup> 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, 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.

<sup>2</sup> See June 25<sup>th</sup> Order, pp. 16 - 21.

3. On September 1, 2023, Genera filed a document titled *Motion to Submit Monthly Maintenance Report for August 2023, in Compliance with Resolution and Order dated June 25, 2023* (“September 1<sup>st</sup> Motion”). Relevant to this Motion, Genera requested modifications to the filing schedule for the following reports: (a) the Implementation of Grid Modernization Plan within twenty (20) days following the conclusion of each bi-monthly reporting period; and (b) the submission of the Permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan Updates within twenty (20) days after the end of the monthly reporting period.

4. On June 26, 2024, the Energy Bureau of the Puerto Rico Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order titled *Determination on the FY25 Annual Budgets for the electric utility* (“June 26<sup>th</sup> Resolution”), finding that the FY2025 Budgets filed by LUMA<sup>3</sup>, and modified by the June 26<sup>th</sup> Resolution, complied with Act 57-2014<sup>4</sup> and the 2017 Rate Order<sup>5</sup>. Relevant to the instant Motion, in the June 26<sup>th</sup> Resolution, the Energy Bureau ordered Genera to:

“[s]ubmit monthly reports, beginning August 1, 2024, that show the status of the repairs and maintenance activities planned and underway. These reports shall include all maintenance/repair activities about the Aguirre, Costa Sur, San Juan, and Palo Seco power plants using the template given in **Attachment H** of the [June 26<sup>th</sup> Resolution]”

*See*, June 26<sup>th</sup> Resolution, p. 13.

5. Furthermore, in pertinent part to this Motion, the Energy Bureau stated that “**All existing reporting requirements remain in full force and effect.**” *See* June 26<sup>th</sup> Resolution, p. 24 (emphasis supplied).

6. On July 26, 2024, Genera filed a document titled *Motion to Clarify and Request Amendment to Cadence of Reporting Requirement under Resolution and Order Dated June 26, 2024* (“July 26<sup>th</sup> Motion”). In the July 26<sup>th</sup> Motion, Genera, among other things, requested that the Energy Bureau allow

---

<sup>3</sup> LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as “LUMA”).

<sup>4</sup> Act No. 57 of May 27, 2014, as amended, also known as the “Puerto Rico Energy Transformation and RELIEF Act” (“Act 57-2014”).

<sup>5</sup> *See* Final Resolution and Order, *In Re: Puerto Rico Electric Power Authority Rate Review*, Case No. CEPR-AP-2015-0001, January 10, 2017 (“2017 Rate Order”).

it to modify the reporting cadence of the maintenance and repair activities report for the Aguirre, Costa Sur, San Juan, and Palo Seco power plants (“Generation Maintenance and Repair Status Report”) and submit the report within the first twenty (20) days following the end of each month. This alignment would ensure that Genera maintains consistency in its reporting, avoids unnecessary duplication of effort, and facilitates a more efficient and effective compliance process.

7. In compliance with the June 25<sup>th</sup> Order and the June 26<sup>th</sup> Resolution, Genera hereby submits as ***Exhibit A*** to this Motion which consolidates and reflects in one spreadsheet both (1) the Generation Maintenance Report in alignment with *Attachment J* of the June 25<sup>th</sup> Order and (2) the Maintenance and Repair Status Report for the Aguirre, Costa Sur, San Juan, and Palo Seco Power Plants, in accordance with *Attachment H* of the June 26<sup>th</sup> Resolution. This report contains comprehensive information and updates for the period from July 1, 2023 to June 30, 2025, and meets the reporting requirements of the June 25<sup>th</sup> Order related to (a) Generation Maintenance and (b) the Permanent and Emergency Work-Related Federal Funding and Infrastructure Report. Lastly, Genera hereby submits as ***Exhibit B*** to this Motion the Grid Modernization Highlights for the month ending June 30, 2025, fulfilling the reporting requirements of the Implementation of the Grid Modernization Plan as per the June 25<sup>th</sup> Order.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **DEEM** that Genera has complied with the *June 25<sup>th</sup> Order* and the *March 6<sup>th</sup> Order* concerning the reports specified in Attachment J, and with the *June 26<sup>th</sup> Resolution*, as it pertains to the report outlined in its Attachment H, both which are jointly presented in Exhibit A of the present motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20th day of July 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@sbglaw.com  
TSPR 9,669

/s/ Stephen David Romero Valle  
Stephen David Romero Valle  
sromero@sbglaw.com  
RUA No. 21,881

### CERTIFICATE OF SERVICE

I 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 I will send an electronic copy of this motion through counsels of record at: [nzayas@gmlex.net](mailto:nzayas@gmlex.net); [arivera@gmlex.net](mailto:arivera@gmlex.net), at [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [jan.albinolopez@us.dlapiper.com](mailto:jan.albinolopez@us.dlapiper.com); [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com); and [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov) .

In San Juan, Puerto Rico, this 20th day of July 2025.

/s/ Stephen D. Romero Valle  
Stephen D. Romero Valle

Exhibit A

Generation Maintenance Report  
and  
Maintenance and Repair Status Report for Aguirre, Costa Sur, San Juan, and Palo Seco Power Plants  
(Native file submitted via email)

## Exhibit B

### Grid Modernization Highlights

Accomplishments	Upcoming Actions and Activities
<ul style="list-style-type: none"><li>▪ <b>Generation Assets Repairs</b><ul style="list-style-type: none"><li>▪ <b>Palo Seco 4</b> – The unit has been out of service since August 8, 2023, due to a forced outage caused by generator failure. The rotor was received and was installed. The unit is expected to return to service in September 2025.</li><li>▪ <b>San Juan 7</b> – Currently undergoing major maintenance. The unit is expected to return to service in September 2025.</li><li>▪ <b>Aguirre CC</b> – Units 2-1, 2-2, 2-4 returned to service in early May 2025, contributing approximately 150MW to the system. No issues have been reported since their return.</li><li>▪ <b>Aguirre 2</b> – The unit returned to service on June 19, 2025.</li></ul></li></ul>	<ul style="list-style-type: none"><li>▪ <b>San Juan TM 4</b> – The unit is currently undergoing scheduled major maintenance and is expected to return to service by the end of September 2025 since Genera is in the process of acquiring the parts.</li><li>▪ <b>San Juan TM 9</b> – The unit is out of service due to an output breaker failure. The return-to-service date is to be determined (TBD).</li></ul>
	<b>Challenges, Shortfalls, Limitations or Constraints</b>
<b>High Priority Due Outs</b>	<ul style="list-style-type: none"><li>▪ <b>Aguirre Combined Cycle</b><ul style="list-style-type: none"><li>▪ <b>Unit 1-3</b> – A major inspection and rotor installation are currently underway. The unit is expected to return to service by July 2025. This work is federally funded, and Genera has received approval for the change order to acquire the turbine casing.</li><li>▪ <b>Unit 2-3</b> – The inspection of the turbine has been completed. Damage to the turbine blades was identified, and repairs are recommended. Genera is currently developing the repair schedule.</li></ul></li><li>▪ <b>Aguirre 1</b> – The unit experienced a catastrophic generator failure. Genera is in the process of removing the rotor, and inspections of both the stator and rotor are expected to be completed by the end of June 2025. Due to the long lead time for replacement parts, the unit is expected to remain out of service for approximately one additional year.</li></ul>



# Grid Modernization Report

## Legacy Generation Assets Status – June 30, 2025

UNIT	COD	USE	FUEL	NAMEPLATE CAPACITY (MW)	CURRENT CAPACITY	REPAIRS FUNDS SOURCE	EXPECTED COMPLETION DATE	NOTES
Aguirre 1	May-76	Base	Bunker C	450	0	Force Outage	Summer 2026	Generator Mayor Repair
Aguirre 2	Oct-75	Base	Bunker C	450	350	N/A	N/A	
Costa Sur 5	Sep-72	Base	LNG & Bunker C	410	300	NME	N/A	
Costa Sur 6	Sep-73	Base	LNG & Bunker C	410	300	N/A	N/A	Limitations
Palo Seco 3	Feb-70	Base	Bunker C	216	183	N/A	N/A	Limitations
Palo Seco 4	Jul-70	Base	Bunker C	216	0	NME	26-Jul	Forced Outage
San Juan 5	8-Oct	Base	LNG & Diesel	210	207	N/A	N/A	Major overhaul
San Juan 6	8-Oct	Base	LNG & Diesel	210	160	NME		Limitations STG 5
San Juan 7	May-68	Base	Bunker C	100	0	NME	30-Aug	Major overhaul
San Juan 9	Jun-88	Base	Bunker C	100	100	N/A	N/A	
ADGG GTG 1&2	Jul-77	Reserve	Diesel	592	298	N/A	N/A	
Cambalache	Apr-97	Reserve	Diesel	247	78	N/A	N/A	Limitations
Mayaguez	9-Apr	Reserve	Diesel	220	97	N/A	N/A	Limitations
Peakers Fleet	(M) 1971 & (3)/2019	Reserve	Diesel	396	202	N/A	N/A	
SJ & PS TM	24-Mar	Reserve	LNG & Diesel	340	340	N/A	N/A	S.JTM 4 MM & S.JTM 1 AM
TOTALS				4567MW	2265 MW			Available Capacity

**Legend:**

Unit under maintenance or repair

Unit in service with limited Capacity

Unit under normal operation