

**GOVERNMENT OF PUERTO RICO
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: Informative Motion on the Status of
SOW: 4 x 25 MW BESS Interconnections at
LUMA 38kV System (July) and Request for
Modification of Reporting Requirement**

**INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS
INTERCONNECTIONS AT LUMA 38KV SYSTEM (JULY) AND REQUEST FOR
MODIFICATION OF REPORTING REQUIREMENT**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), through the undersigned legal counsel and respectfully submit the following:

I. Relevant Procedural Background

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority (“PREPA”) submit to the Energy Bureau the specific projects to be funded with Federal Emergency Management Agency (“FEMA”) funds or any other federal funds at least thirty (30) calendar days prior to submitting these projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”), FEMA or any other federal agency (“March 26th Order”). It also directed PREPA to continue reporting to the Energy Bureau and FEMA within the next five years, the progress of all ongoing efforts related to the approval of the submitted projects not yet approved by the Energy Bureau. This Energy Bureau thereafter determined this directive applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law*. Therein, LUMA submitted the scope of work (“SOW”) for the “4 x 25 MW BESS Interconnections at LUMA 38kV System” transmission and distribution project (“4 x 25 MW BESS T&D Project”), for the Energy Bureau’s review and approval before submitting it to COR3 and FEMA (“August 25th Motion”).

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order in which it approved the 4 x 25 MW BESS Project SOW, determining that this project was necessary to improve the system’s reliability (“August 30th Order”).

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order in which it ordered LUMA “to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the [4 x 25 MW BESS Project]” (“January 3rd Order”). *See* January 3rd Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System* to comply with the January 3rd Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the 4 x 25 MW BESS Project until its June 2025 completion date (“January 14th Order”). *See* January 14th Order, p. 2. The Energy Bureau directed that the status report includes:

- i) The locations of the twenty (20) sites studied;
- ii) The final four selected sites;
- iii) The cost to complete the studies of the twenty sites.
- iv) Indicate the funds utilized to pay for these studies and the amount spent to date.
- v) The reimbursement status of these funds, or if they were advanced by FEMA
- vi) The [Detailed SOW (“DSOW”)] presented to FEMA and COR3;
- vii) The ROI and LUMA responses to such ROI requested by FEMA and COR3;

- viii) The FAASSt number for the project; and
- ix) An updated cost estimate based on the DSOW.

See Id.

7. In compliance with the January 14th Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this Motion.

II. Request to Continue Submitting Monthly Reports of the 4 x 25 MW BESS Project exclusively on Case No. NEPR-MI-2024-0005, In Re: Stability Priority Plan for the Electric Grid

8. On March 28, 2025, the Energy Bureau issued a Resolution and Order (“March 28th Order”) in Docket No. NEPR-MI-2024-0005, *In Re: Plan Prioritario para la Estabilización de la Red Eléctrica* (“Priority Stabilization Plan Docket”), approving an Electric System Priority Stabilization Plan (“Priority Stabilization Plan”) and instructing LUMA, Genera, and PREPA to provide a monthly status report of the activities established in the Priority Stabilization Plan starting on April 27, 2025, to be filed by LUMA as one (1) collaborative report (the “Monthly Collaborative Report(s)”). *See* March 28th Order, p. 11. The Energy Bureau further directed that the Monthly Collaborative Report include but not be limited to a detailed discussion of each activity’s progress and any potential implementation issues and proactive solutions to the same. *See id.* The 4 x 25 MW BESS Project is one of the activities established in the Priority Stabilization Plan. *See id.*, Attachment A, p. 17-18.

9. LUMA has filed the Monthly Collaborative Reports for the months of April,¹ May,² and June,³ and is filing today the Collaborative Report for July. In LUMA’s status updates for the

¹ *See Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025*, filed by LUMA in the Stability Priority Plan docket on April 28, 2025.

² *See Motion to Submit May 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025*, filed by LUMA in the Stability Priority Plan docket on May 27, 2025.

³ *See Motion to Submit June 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025*, filed by LUMA in the Stability Priority Plan docket on June 27, 2025.

4x25 MW BESS Project in the Monthly Collaborative Reports, LUMA has included a copy of the status reports submitted in the instant proceeding.

10. To avoid duplication of work and resources, simplify process and achieve greater efficiencies, LUMA respectfully requests the Energy Bureau to modify the reporting requirements relating to the status of the activities of the 4x25 MW BESS Project by eliminating this requirement from the instant docket and preserving it only in the Priority Stabilization Plan docket, where it would remain in effect. LUMA notes that there are other reporting requirements relating to federal funding related to approved T&D Projects —and specifically with respect to the 4X25 MW BESS Project— that will continue to apply in this docket which LUMA will continue to meet.⁴

11. Accordingly, LUMA respectfully requests the Energy Bureau to accept July's Monthly Report on the 4x25 MW BESS Project, attached as **Exhibit 1**, as the last monthly report of this project in the present docket. LUMA will continue to report on the status of the 4x25 MW BESS Project through the monthly reports filed in the Priority Stabilization Plan Docket.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the Monthly Status Report for the 4x25 MW BESS Project as *Exhibit 1* to this Motion; **grant** LUMA's request to eliminate the status reporting requirement for this project in this docket while it is continued in the Priority Stabilization Plan Docket exclusively; and **deem** LUMA in compliance with the January 14th Order.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to counsel for PREPA Alexis Rivera, arivera@gmlex.net, and to Genera PR LLC, through its counsel of record, Jorge Fernández-

⁴ Once the 4x25 MW BESS Project is finalized, LUMA will file a motion with the Energy Bureau to inform the conclusion of the Project, as well as comply with any other reporting requirement set in the instant docket.

Reboredo, jfr@sbglaw.com, Jennise M. Álvarez González, jennalvarez@sgblaw.com, and Francisco Santos, francisco-santos@genera-pr.com.

In San Juan, Puerto Rico, on this 29th day of July 2025.



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Exhibit 1

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report (July)

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report

July 29, 2025

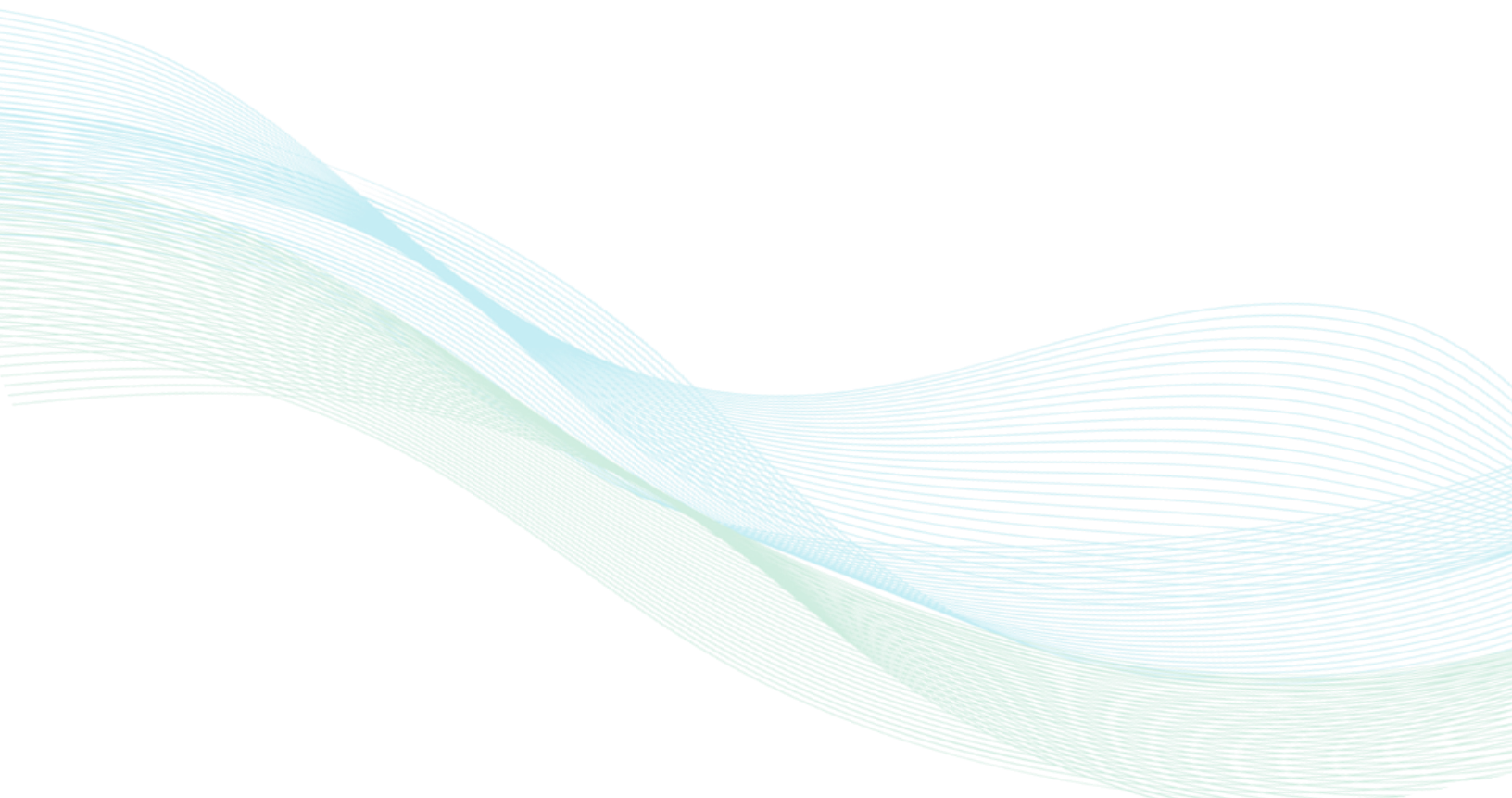


Contents

Tables & Figures.....	3
1.0 Introduction.....	4
2.0 Monthly Status Update.....	4
2.1 Detailed Scope of Work	4
2.2 Procurement.....	4
2.3 Design Status.....	4
2.4 Project Schedule	4
3.0 Project Status	5
3.1 Selected Sites	5
3.2 Reimbursement Status.....	5
3.3 Requests for Information.....	5
3.4 FAASr Number	5
3.5 Updated Project Cost	5

Tables & Figures

Table 1. Reimbursement Received 5
Table 2. FAASt Number..... 5
Table 3. Class 3 Cost Estimate 6



1.0 Introduction

In accordance with the Resolution and Order dated January 14, 2025, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at LUMA 38 kV project. This report focuses on the key activities and progress achieved by LUMA in the past 30 days for the Battery Energy Storage Systems (BESS or collectively as the “Project”) approved by the Energy Bureau in its Resolution dated August 30, 2023 (“August 30th Resolution”).

2.0 Monthly Status Update

2.1 Detailed Scope of Work

The four Detailed Scopes of Work (DSOWs) are currently under review of the Federal Emergency Management Agency (FEMA), under FEMA review phase 2: “Pending Scope & Cost Completion by Applicant”. LUMA is working on the response for the soft Request for Information (RFI) related to the Manatí, Barceloneta, Aguadilla and San Juan DSOWs received from FEMA.

2.2 Procurement

LUMA has completed drafts for the scopes of procurements for the engineering, design, and procurement needed to execute the Project. LUMA expects to issue the request for proposal (RFP) in the first quarter (Q1) of fiscal year 2026 (FY2026).

2.3 Design Status

The Preliminary Design has been completed. The Detailed Design will be managed by the selected vendor through a competitive procurement process.

2.4 Project Schedule

LUMA has been studying and pursuing the deployment of BESS to multiple locations as part of the Project. LUMA's high-level schedule for this Project includes:

- Procurement - Notice to proceed: January 2026
- Construction Start: January 2027
- Commissioning: February 2027

A more detailed schedule will be provided once the funds have been obligated by FEMA and Central Office for Recovery, Reconstruction and Resilience for Puerto Rico (COR3). These expected dates depend on LUMA being able to procure resources, including equipment, at the expected times.

3.0 Project Status

3.1 Selected Sites

LUMA has not yet finalized the sites where it intends to deploy the four BESS, but has determined proposed locations across the general areas where the projects would be sited. Specifically, these are (1) Aguadilla, (2) Barceloneta, (3) Manatí, and (4) San Juan. LUMA will supplement its response as final selections are made, and real estate details are finalized.

3.2 Reimbursement Status

Table 1. Reimbursement Received

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$47,355.27

3.3 Requests for Information

On June 9, 2025, FEMA sent LUMA a soft RFI related to the Manatí, Barceloneta, Aguadilla and San Juan DSOWs regarding 406 and 428 allocations, LUMA is working on the response.

3.4 FAASt Number

As indicated in Section 3.1 above, LUMA has identified four areas where it intends to site the projects. The FEMA FAASt numbers for the four BESS projects are:

Table 2. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	738671
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503

3.5 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta, Manatí, Aguadilla and San Juan DSOWs submitted to FEMA.

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

Table 3. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate (\$)
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation) Barceloneta	\$55,941,767
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$57,640,005
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$52,720,520
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$55,503,065