

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

NEPR
Received:
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IN RE:

REQUEST FOR APPROVAL OF THE
VEGA BAJA DECOMMISSIONING
PLAN

CASE NO.: NEPR-MI-2024-0003

SUBJECT: Motion to Submit Quarterly
Progress Report for the Vega Baja
Decommissioning Plan

**MOTION TO SUBMIT QUARTERLY REPORT FOR THE VEGA BAJA
DECOMMISSIONING PLAN**

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 October 31, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order titled *Approval of the Vega Baja Decommissioning Plan* ("October 31st Resolution"). In the October 31st Resolution, the Energy Bureau determined that the decommissioning of the Vega Baja Power Station submitted by Genera aligns with the Approved Integrated Resource Plan ("Approved IRP")² and the strategic initiatives for transitioning Puerto Rico's energy infrastructure towards renewable sources.

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.

² Final Resolution and Order on the Puerto Rico Electric Power Authority's Integrated Resource Plan, *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001, August 24, 2020 ("Approved IRP"). Minor modifications and/or clarifications to the Approved IRP were introduced through a Resolution and Order on Reconsiderations issued by the Energy Bureau on December 2, 2020, in case: *In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, Case No. CEPR-AP-2018-0001.

2. On December 18, 2024, Genera filed a document titled *Motion to Submit the Revised Updated Decommissioning Plan* ("December 18th Motion"). Through the December 18th Motion, Genera submitted the fully revised Updated Decommissioning Plan incorporating all mandated changes set forth in the December 13, 2024, Resolution & Order. Genera submitted through the December 18th Motion the corresponding redlined version, reflecting the changes conducted by Genera's revision to the Updated Decommissioning Plan.

3. On December 19, 2024, the Energy Bureau issued a Resolution titled *Approval of the Vega Baja Decommissioning Plan* ("December 19th Resolution"). Through the December 19th Resolution, the Energy Bureau, after reviewing the submitted documents, determined that the Updated Decommissioning Plan dated December 16, 2024, complies with the requirements set forth by the Energy Bureau.

4. In compliance with the December 19th Resolution, Genera hereby submits, as Exhibit A to this Motion, the Quarterly Progress Report for the Vega Baja Decommissioning Plan.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera's Quarterly Progress Report for the Vega Baja Decommissioning Plan, submitted as Exhibit A to this Motion; and **deem** Genera in compliance with the December 19th Resolution.

RESPECTFULLY SUBMITTED.

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

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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.

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

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

Exhibit A
Quarterly Progress Report for the Vega Baja Decommissioning Plan



Quarterly Progress Report: Genera PR Vega Baja Power Plant

Reporting Period:

April 21, 2025- July 15, 2025

Project Site:

Vega Baja, Puerto Rico

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INTRODUCTION

Pursuant to Section 11.1 of the Vega Baja Proposed Decommissioning Plan, Genera PR will provide quarterly reports to the Puerto Rico Energy Bureau (PREB) and the Puerto Rico Public-Private Partnerships Authority (P3A). This document presents the Second Quarterly Report for the decommissioning of the Genera PR Vega Baja Power Plant. The report provides details of milestones completed, up-to-date expenditures, descriptions of work completed, and regulatory compliance. All details were structured per the three-phase approach established in the Vega Baja Proposed Decommissioning Plan which are: 1) Permitting, 2) Pre-demolition, and 3) Dismantling, Removal, and Demolition.

KEY MILESTONES COMPLETION

PHASE 1: PERMITTING

The following table shows the Vega Baja Plant demolition related permits obtained.

ID	Agency	Permit or Approval	Date Obtained
1	Federal Emergency Management Agency (FEMA), and any other involved federal agencies	NEPA Document Preparation and Approval (Categorical Exclusion expected)	29-APR-2024
2	United States Fish and Wildlife Services (USFWS)	Endangered Species Act (ESA) Section 7 Endangered Species Consultation or Determination of No Effect	17-JUL-2024
3	State Historic Preservation Office (SHPO/OECH)	National Historic Preservation Act Consultation (Section 106)	17-JUL-2024
4	Department of Natural and Environmental Resources (DNER)	Rule 141 - Environmental Impact Documentation	20-NOV-24

ID	Agency	Permit or Approval	Date Obtained
5	DNER	Asbestos/Lead Removal Permit	30-JAN-25
6	Federal Emergency Management Agency (FEMA)	Rule 13 – Elevation Certification	28-MAR-25
7	DNER	Lead Removal Certification	21-APRIL-25
8	DNER	Unique Incidental Permit (PUI)	20-MAY-25

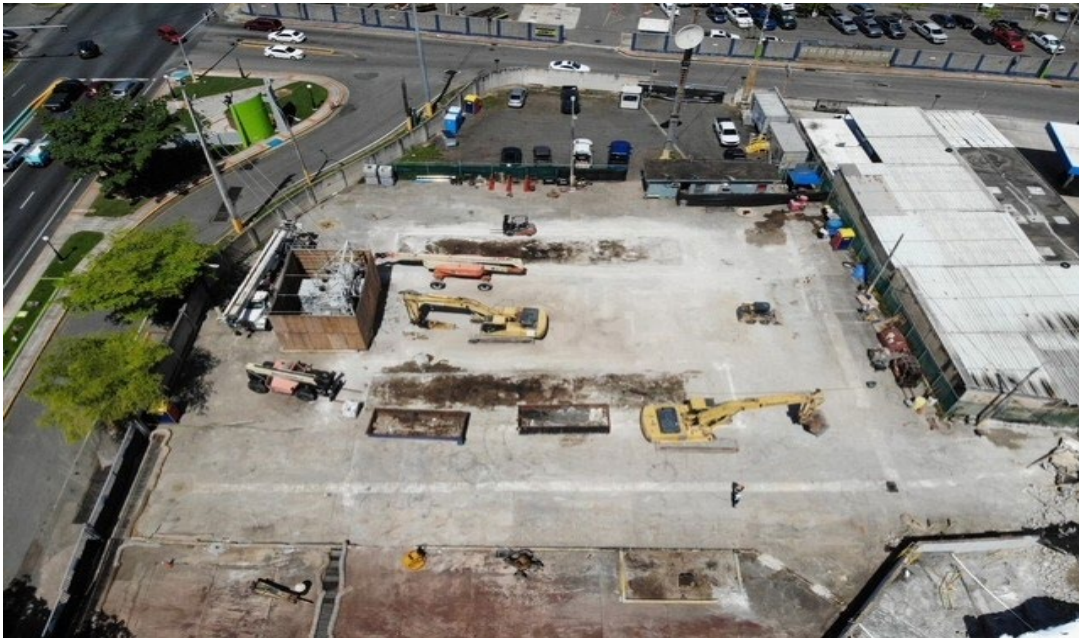
PHASE 3: DEMOLITION

Several key activities were carried out during Phase 3 of the project. Below is a recap of the major demolition and removal efforts:

- The battery room was taken down on Friday, April 11, 2025.
- Demolition of the office building followed on May 23, 2025.
- On May 28, 2025, crews completed the removal of the turbines, breakers, auxiliary compartments, and related structures. On the same day, the switchgear, generator, gas turbine, and control systems were also fully dismantled.
- The existing diesel inventory (approx. 230,600 gallons) was unloaded, transferred, and transported to the Palo Seco Power Plant on Tuesday, June 3, 2025.
- The telecom pole came down on June 7, 2025.
- Demolition of diesel tanks (3/3) and auxiliary systems was completed by Wednesday, June 9, 2025.

- The final structural elements, including the concrete framework and the security office, were removed on June 9, 2025.
- The parking fence was taken out on June 11, 2025.

As of now, the Vega Baja Power Plant site reflects the extensive demolition work, with all major equipment and structures cleared. Although demolition activities were completed by schedule on June 11, the subcontractor demobilized from the site on June 26.



Current view of the Vega Baja Power Plant site following major demolition activities, including the removal of turbines, tanks, and structural elements.

The demolition phase was completed during the week of June 9, 2025. (At the time of this report, all demolition activities have concluded in accordance with the approved schedule.)

BUDGET AND EXPENDITURES

Phase	Activity	Budget Estimated	Actual cost	Remaining cost
1	Permitting Application Fees	\$123,000.00	\$37,609.67	\$85,390.33
2	Geophysical Survey	\$18,350.00	\$18,350.00	\$0.00
2	Lead & Asbestos Testing (Cost for abatement is not included)	\$20,000.00	\$4,834.00	\$15,166.00
2	Protective Measures, Salvage Work, and Site Disconnections (20% of total decommissioning cost estimate)	\$330,890.00	\$0.00	\$330,890.00
2	Pre-Demolition Activities by Contractor	\$305,000.00	\$114,480.00	\$190,520.00
2	Pre-Demolition Activities by Genera	\$180,691.00	\$0.00	\$180,691.00
2	Contingency (environmental remediation activities, delays, etc.)	\$595,602.00	\$0.00	\$595,602.00
3	Above-Ground Dismantling and Demolition (Does not include costs for abatement and/or disposal of hazardous waste)	\$655,411.00	\$480,020.00	\$175,391.00
-	Project Management	\$332,000.00	\$548,466.25	(\$216,466.25)
Total		\$2,560,944.00	\$1,203,759.92	\$1,357,184.08

During this reporting period, Homeca Recycling Center submitted two invoices totaling \$114,480.00, both of which have been reviewed, approved, and fully paid. The first invoice was for \$40,950.00, and the second for \$73,530.00, with \$12,720.00 retained. These payments were processed in coordination with the finance and contracts teams, following all applicable federal funding guidelines and internal financial procedures.

A third invoice, totaling **\$537,800.00**, is currently under review. Of this amount, **\$53,780.00** is being retained, resulting in a pending payment of **\$480,020.00**, despite the invoice being listed as an actual expense.

WORK COMPLETED – REPORTING PERIOD SUMMARY

The project team made significant progress during this reporting period, executing a range of demolition, environmental, and logistical activities in alignment with the decommissioning plan. Below is a week-by-week breakdown of the work completed:

Week of April 21–27, 2025

- Continued dismantling Units 1-1 and 1-2, including chimney stack cutting, engine house demolition, and structural disassembly.
- Hot work and material removal focused on the turbo compressor and fuel skid areas.
- Environmental controls were reinforced, including sediment device repairs and diesel/oil extraction from containment zones.
- Site coordination included walkdowns, planning for turbo compressor relocation, and visits from environmental personnel.

Week of April 28–May 4, 2025

- Demolition and hot work progressed at Units 1-1 and 1-2, with steel cutting at structural frames and accessory gear sections.
- Oil and diesel removal at Unit 1-1 continued using vacuum trucks and absorbents, alongside containment improvements.
- Site inspections were conducted by the PUI inspector and S&L personnel to review CES compliance and overall progress.

Week of May 5–11, 2025

- Ongoing demolition and hot work included cutting structural steel, generator enclosures, and accessory gear.
- A 50-ton crane arrived for heavy lifting operations, including rigging prep for exhaust stack removal.
- Demolition of the 15KV switchgear cabinet advanced, with removal of lightning arrestors, ducts, and cables.
- Scrap metal cleanup and equipment upgrades were carried out, with new rentals arriving and older units cycled off-site.

Week of May 12–18, 2025

- Exhaust stack dismantling (Unit 1-2): major rigging operations removed multiple sections and baffles, which were transported to Homeca's Caguas facility.
- Heavy demolition work on Unit 1-1 continued, focusing on the generator covers, turbo compressor, excitation supports, and air intake filter base. Excavators also stockpiled scrap materials for recycling.
- Safety & environmental oversight: QA flagged dust control issues during concrete demolition. Daily inspections ensured safe tank and gas line handling.
- Support activities: electrical subcontractors set up temporary power for the guard shack. Environmental crews managed oily water and sediment removal.

Week of May 19–25, 2025

- Major equipment removal: turbo compressors, generators, and plenum structures from both units were dismantled and shipped to San Juan and Caguas.
- Diesel transfers: multiple successful fuel transfers, for a total of 123,000 gallons, were completed using truck tankers 509, 510, 507, and 246, supporting logistics to Palo Seco.
- Structural work: steel cutting and removal continued at both units, including the load gears and support frames.
- Demolition of facilities: the old administration building and storage trailers were demolished, clearing space for ongoing work.

Week of May 26–June 2, 2025

- Genera continued the dismantling of major structures, including mesh and concrete base removal at Unit 1-2, and demolition of oil/lube containment dikes and fuel pump station foundations.
- Fuel system work included draining dirty water, cleaning pipelines, and removing valves, fittings, and pumps for disposal or transport.
- Housekeeping and safety prep included scrap cleanup, power washing, and staging for equipment transport to Palo Seco.
- Gas and oxygen tanks were inspected, and diesel hoses and valves were installed in preparation for fuel transfers.

Week of June 2–6, 2025

- On June 2 alone, over 57,000 gallons of diesel were transferred, followed by 39,600 gallons on June 3. Between May 20 and June 3, a total of 230,600 gallons were successfully delivered to Palo Seco.
- Demolition and cleanup activities began on Diesel Tank S-1, including sludge removal, demolition of concrete walls, and recycling of metal components, all conducted in compliance with strict safety and waste management protocols.
- Electrical system relocations and temporary power setups were coordinated with LUMA and contractors to maintain operations.
- Multiple safety assessments and job hazard analyses (JHAs) were conducted. A minor fire during tank vent cutting was quickly contained, and dust control measures were reinforced due to high winds.

Summary:

- Battery room demolition was completed on April 11, 2025.
- Demolition permits were obtained by April 21, 2025.
- Demolition began the week of April 21–27.
- Turbines, breakers, and auxiliaries were removed by May 7.
- PUI Permit (2025-628831-PUI-301473) was obtained on May 20.
- Gas turbines and the generator were demolished by May 28.

- The existing diesel inventory (approx. 230,600 gals) was transferred to Palo Seco by June 3.
- Telecom pole was removed on June 7.
- Security house was demolished on June 8.
- Auxiliary tanks were removed by June 9.
- Fuel tanks were fully demolished by June 9.
- Final structural elements were removed by June 9.
- Parking fence was taken out on June 11.
- Substation completion documentation was submitted via Procore on June 13.
- As-built drawing was developed from June 19–20.
- MPT protection was removed and subcontractor demobilized on June 26.
- As-built drawing documentation was submitted via Procore on June 30.
- Final site restoration was completed on June 21, 2025.

Anticipated challenges:

- Delays in the environmental approval process due to administrative review timelines.

Mitigation strategy:

- Early submission of documentation and proactive follow-up with agencies to minimize potential delays.

A community event was held on February 11, 2025, aimed at engaging local stakeholders and sharing updates on the commissioning plan. A follow-up meeting **was successfully held on June 23, 2025**, to provide an update on recent developments at the site and to address any questions or concerns from the community.

CONFIRMATION OF REGULATORY COMPLIANCE

All project activities during this reporting period were conducted in compliance with applicable federal, state, and local regulatory requirements. Environmental protocols,

particularly related to the identification and removal of lead-based materials, were followed as outlined in the approved decommissioning plan.

Health and safety procedures, including Lockout/Tagout (LOTO) measures and transformer protection, were implemented on-site and verified by the project oversight team. Coordination with regulatory agencies remained active to ensure all planned work aligns with permit conditions and reporting obligations.

All critical project documentation—such as environmental clearance reports, safety certifications, and engineering plans—are being uploaded and stored in the Construction Management Software - Procore. This ensures secure, centralized access for stakeholders and supports fully traceability for internal review and future audits.