

**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 July 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 July 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 8th day of August 2025.

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

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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 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; mrios@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 8th day of August 2025.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/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

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 for BESS installation was approved on August 1, 2025, by FOMB and P3A on August 4, 2025.
- Weekly construction coordination meetings with RGE (contractor) personnel are ongoing.
- The Interconnection Facility Study report is expected to be completed and delivered to Genera by October 20, 2025.
- Upon contract approval the Notice to Proceed should be issued by mid-August.
- Integra, an external engineering company will undertake a structural study of the bridge in route to the plant's main entrance and should have the report ready in 10 weeks.
- LT Automation, a PREPA contractor, is responsible for installing an IT/OT communications room and a monopole at the Battery Energy Storage System (BESS) installation sites located in Cambalache, Costa Sur, Palo Seco, and Aguirre. Weekly project coordination meetings are being conducted to monitor progress and address any issues.
- The NPDES permit documentation remains under evaluation and has not yet been submitted.
- The cost estimate for the transformer studies has been submitted and is currently pending approval.

Vega Baja Plant

- Contract for equipment installation was submitted for approval to FOMB / P3A on July 29, 2025.

- The PUI permit (Permiso único incidental from Oficina de Gerencia de Permisos (OGPe) has been closed since the decommission project has concluded.
- LUMA has confirmed they will have completed the Impact Study Report by August 25, 2025, and the Facility Study Report by October 20, 2025.
- Quotes received to relocate the GSU are being reviewed internally.
- The second demolition progress report was submitted to PREB.
- Weekly Construction Meetings with ARG team, the contractor, are ongoing.
- Issuance of a Notice to Proceed is set for September 2025.

Palo Seco plant

- Genera continue evaluating alternative locations for BESS packs installation that would avoid future demolition activities and potentially expedite the installation timeline.
- Jaca & Sierra, Inc. will provide a quote to perform boring tests near Unit 1 & 2.
- LT Automation Inc. will install the IT/OT Communication Room and Monopole in an area that will not impact on the BESS project.

Costa Sur

- Civil and Structural works contract will be submitted for FOMB / P3A approval during August 2025.
- Weekly Construction Meetings with RGE are ongoing.
- LT Automation is determining the location of the IT/OT Communication Rooms and Monopole at Costa Sur.
- Issuance of a Notice to Proceed is schedule for September 2025.

Aguirre

- Civil and Structural works contract will be submitted for FOMB / P3A approval on August 2025.
- Weekly Construction Meetings with RGE are ongoing.
- Issuance of a Notice to Proceed is set for September 2025.

Yabucoa

- Civil and Structural works contract will be submitted for FOMB / P3A approval during August 2025.
- RFC (Request for Clarification) meetings are held with the RGE team every week.
- Issuance of a Notice to Proceed is scheduled for September 2025.

LUMA Interconnection Studies:

- Interconnection applications for Cambalache, Vega Baja, Costa Sur, Aguirre and Yabucoa (Impact Study / Facility Study) were submitted for LUMA's evaluation.
- Cambalache Impact Study Report was received.
- The Vega Baja, Costa Sur, Aguirre & Yabucoa Impact Study should be received by August 20, 2025.
- The Cambalache, Vega Baja, Costa Sur, Aguirre & Yabucoa Facility Studies should be completed and received by October 20, 2025.

Interconnection

- Genera and LUMA executed a Memorandum of Understanding outlining the process for handling interconnection payments. Roles and Responsibilities document is ongoing and expected to be finalized during August 2025.
- 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 due to a COD change to 2026, which has delayed the facility study report since LUMA needs to remodel all interconnections packages.
- 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 for Vega Baja's Demolition Project.

- NPDES (National Pollutant Discharge Elimination System) for Cambalache (Still under evaluation)
- Fire Department Endorsement (For all Sites)

Procurement

- Weekly meetings with Tesla's Project Management Team are ongoing.
- A Long Terms Service Agreement (LTSA) contract continues 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.
- Tesla Transportation Plan for Cambalache is under review by Genera.
- The third (3) Payment Milestone is in process waiting for Tesla to submit updated government certification.