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

IN RE: MANEJO DEL MANTENIMIENTO Y REPARACIONES DE LAS UNIDADES DE GENERACIÓN UTILIZADAS POR LA AUTORIDAD DE ENERGÍA ELÉCTRICA DE PUERTO RICO PARA SUPLIR SERVICIO ELÉCTRICO	**CASE NO.:** NEPR-MI-2021-0014 **SUBJECT:** Motion to Submit Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for the Fourth Quarter of Fiscal Year 2025

MOTION TO SUBMIT QUARTERLY REPORT ON CONSUMABLES, SPARE PARTS, AND CAPITAL SPARE PARTS FOR THE FOURTH QUARTER OF FISCAL YEAR 2025

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 June 16, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("June 16th Resolution"), whereby it established Docket No. NEPR-MI-2021-0014 to remain informed about the operating state of the Electric Power System and for filing of material related to the maintenance and repair of PREPA's generation fleet. The Energy Bureau noted the obligations of Genera pursuant to Section 4.2 of the LGA OMA to report on the available inventory of Consumables, Spare Parts, and Capital Spare Parts for each Legacy Generation Asset which could be used for offsetting other costs and

[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 (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.

expenses.[2] Additionally, in this docket, the Energy Bureau required Genera to file its June 1, 2023, Recommendation Letter and any future recommendations mandated by Section 4.2(j) of the LGA OMA, following the same submission timelines specified in that section.

2. On December 12, 2023, Genera filed a document titled *Motion to Submit Amended Response to Resolution and Order Dated November 29, 2023* ("December 12th Motion"), through which Genera submitted a revised assessment of Consumables, Spare Parts and Capital Spare Parts, pursuant to the Energy Bureau's November 29th Resolution.

3. On February 26, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing* ("February 26th Resolution"). In the February 26th Resolution, the Energy Bureau informed that they had found that Genera satisfactorily reflected the Energy Bureau's direction, subject to certain reporting requirements listed in Attachment A to the February 26th Resolution.

4. The Energy Bureau, through the February 26th Resolution, approved the final version of the revised assessment of Consumables, Spare Parts, and Capital Spare Parts subject to the Quarterly Reporting Requirements established in Attachment *A* of the February 26th Resolution, and order Genera to filed the foregoing Quarterly Reports within 45 days after the end of each quarter.

5. In compliance with the February 26th Resolution, Genera respectfully submits the Fourth Quarter ("Q4") Report on Consumables, Spare Parts, and Capital Spare Parts for FY2025 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 Q4 Report on Consumables, Spare Parts, and Capital

[2] *See*, Section 4.2 (j) of the LGA OMA.

Spare Parts for FY2025 as Exhibit A herein; and **deem** Genera to be in compliance with the February 26th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day August of 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
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TSPR 9,669

/s/ Stephen David Romero Valle
Stephen David Romero Valle
sromero@sbgblaw.com
TSPR 21,881

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 PREPA through its counsel of record, Alexis G. Rivera Medina, at arivera@gmlex.net, and Mirelis Valle Cancel, at mvalle@gmlex.net; and to LUMA through its counsel of record, Margarita Mercado Echegaray, at margarita.mercado@us.dlapiper.com and katiuska.bolanoslugo@us.dlapiper.com; and karenortiz@aes.com; elias.sostre@aes.com, and carlos.reyes@ecoelectrica.com.

In San Juan, Puerto Rico, this 15th day of August of 2025.

/s/ Stephen David Romero Valle
Stephen David Romero Valle

Exhibit A

Q4 Report on Consumables, Spare Parts, and Capital Spare Parts for FY2025

Docket Number: NEPR-MI-2021-0014
In Re: Determination on Genera's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing
RE: **Q4 Report**- Maintenance and Repair Management of the Generation Units of the Puerto Rico Electric Power Authority

Attachment A

Planned Maintenance and Critical Component Replacement Program.

GPR–PREB–NEPRMI20210014–20240226 #1

1. Report on Genera's progress in achieving the Expected Results of Forced Outage Reduction: 32% to 15% as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.

Response:

Since GeneraPR commencement day the force outage factor has been reduced from 32% to 27% in September 2024 as stated in the graphic below. The main reasons for these reductions are the following:

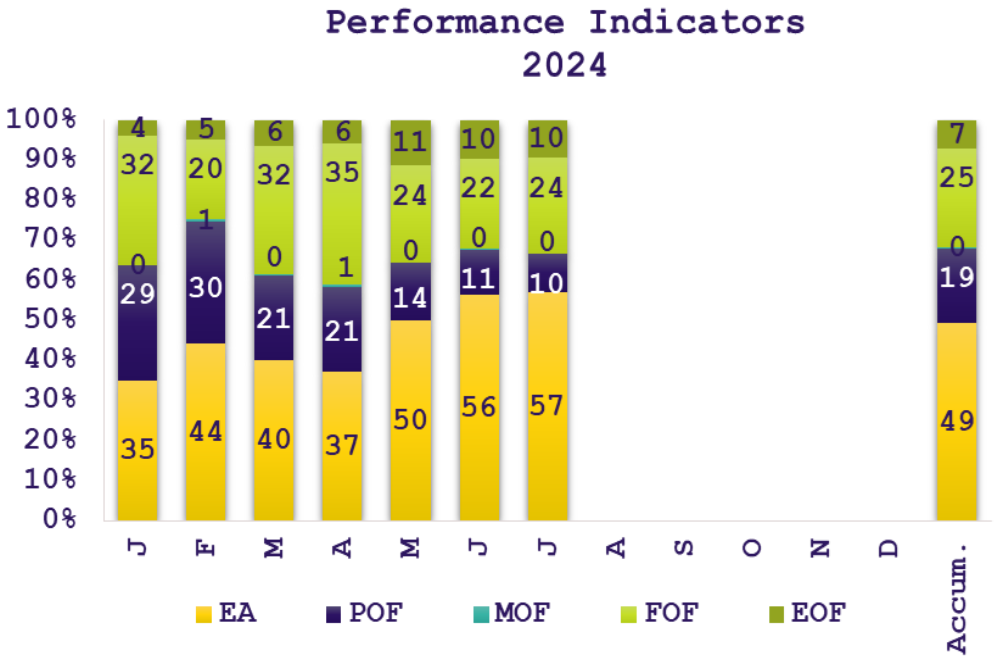
Repairs performed in unit 1 of Aguirre steam plant. The generator of the unit was repaired, and the unit was put in service on February 12, 2024, with a capacity of 450 MW. This unit was out of service since March 16, 2022.

Programmed maintenance on several units:

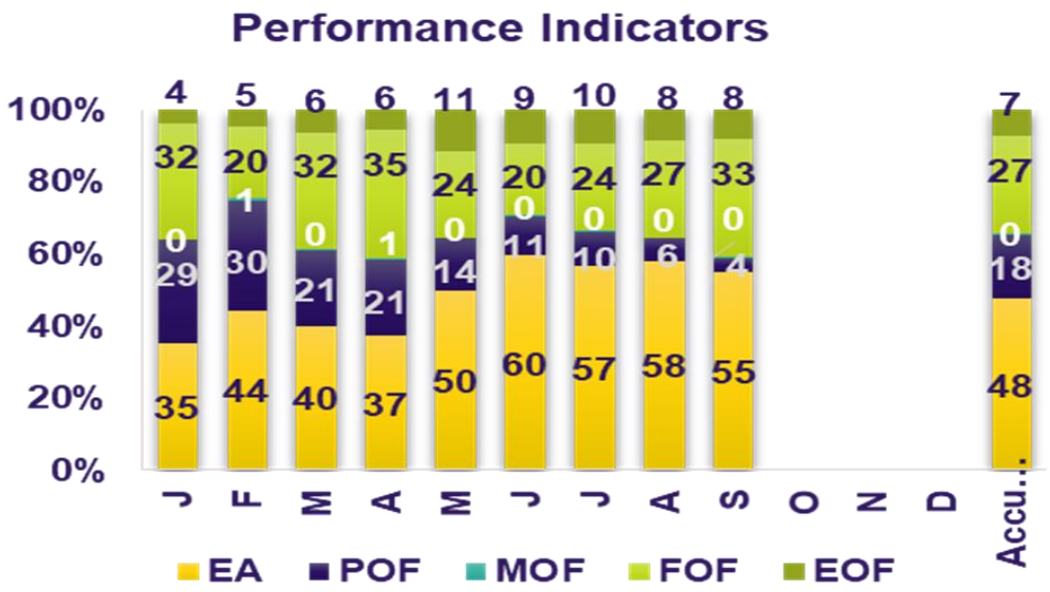
a. Costa Sur 5 underwent a major inspection from July 4, 2023, and was completed on February 28, 2024.
b. Costa Sur 6 environmental maintenance was performed from January 4, 2024, to March 20, 2024. Additionally, Genera replaced the Emergency Station

Service transformer, the normal service transformer 6B and the motorized boiler feed pump, collectively improving the unit's reliability.

c. A major inspection of Unit 3 of Palo Seco Steam Plant, during the economizer section of the boiler was replaced and consequently improving the unit's reliability.



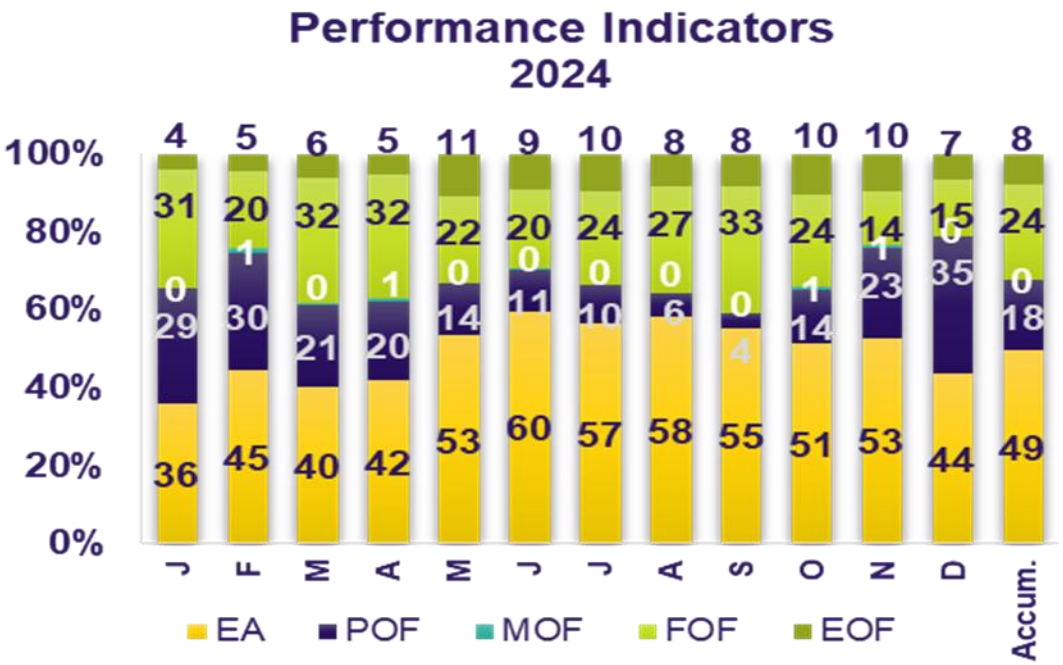
Q1 Response:



Q2 Updated Response:

Since Genera's commencement, the forced outage factor has been reduced from 32% to 24% as of December 2024, as illustrated in the accompanying graphic. Key improvements include:

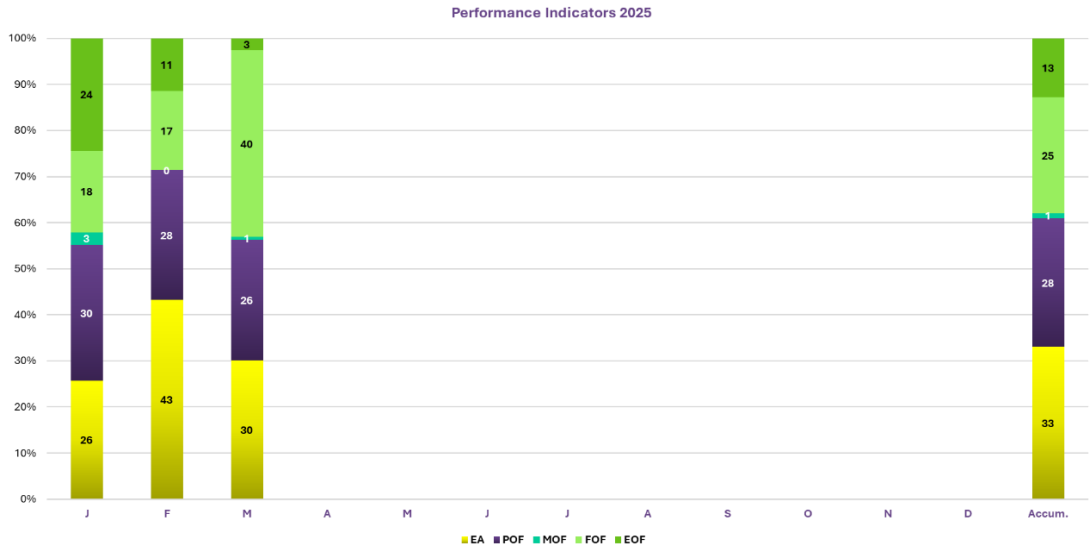
- SJ9 unit was taken out of service on November 29, 2025, for environmental maintenance as requested by the EPA.
- SJ7 is out of service for major maintenance since November 16, 2025.
- SJ6 is out of service for major maintenance since October 20, 2025.
- Palo Seco Unit 3 improved availability from 32% in Q1 to 42% in Q2.
- Aguirre 1 out of service from November 27, 2025, for generator hydrogen seals replacement.



Q3 Updated Response:

Since GeneraPR's commencement, the forced outage factor has been reduced from 32% to 26%, as illustrated in the graphic below. The primary drivers of this improvement include the following:

- San Juan Unit 9 returned to service following an environmental maintenance.
- San Juan Units 6 and 7 underwent a scheduled major maintenance during this period.
- GeneraPR performed major maintenance on Costa Sur Unit 5 and Palo Seco Unit 3 in 2024. As a result of these efforts, both units recorded forced outage factors below 10% during Q3, following the completion of the maintenance activities.



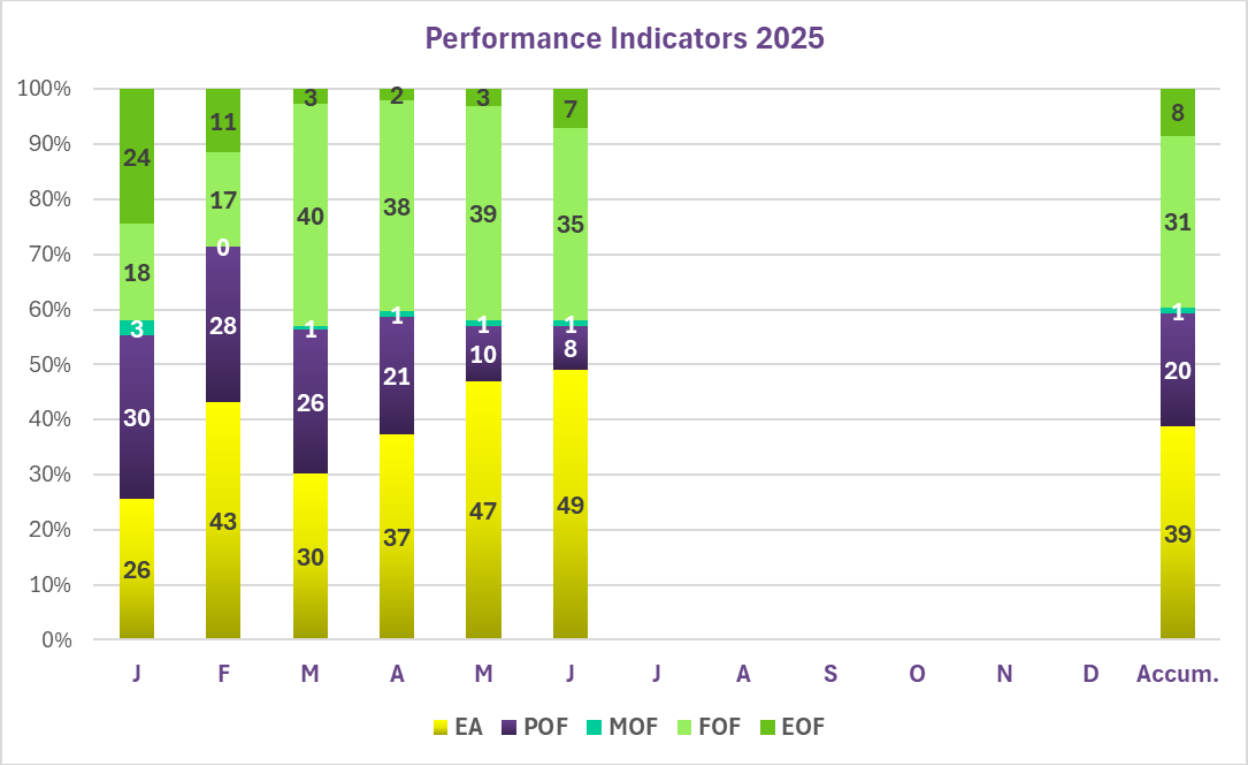
Q4 Updated Response:

Since GeneraPR's commencement, the forced outage factor has been reduced from 32% to 26%, as illustrated in the graphic below. The primary drivers of this improvement include the following:

- San Juan Unit 9 returned to service following an environmental maintenance.
- San Juan Unit 6 major outage was completed on May 8, 2025. Unit is in service in simple cycle mode with a capacity of 160 MW.
- GeneraPR performed a major maintenance on Costa Sur Unit 5 and Palo Seco Unit 3 in 2024. As a result of these efforts, both units recorded forced outage factors below 10% during Q4, following the completion of the maintenance activities.
- Costa Sur Unit 5 environmental maintenance was completed on May 1st as planned. The unit can generate 405 MW using bunker C or Natural gas as fuel. The unit was limited to 175 MW before the planned outage. Further to the completion of the maintenance works, the unit generation capacity increased by 230MW. The forced outage factor of this unit was 0 % in June 2025.

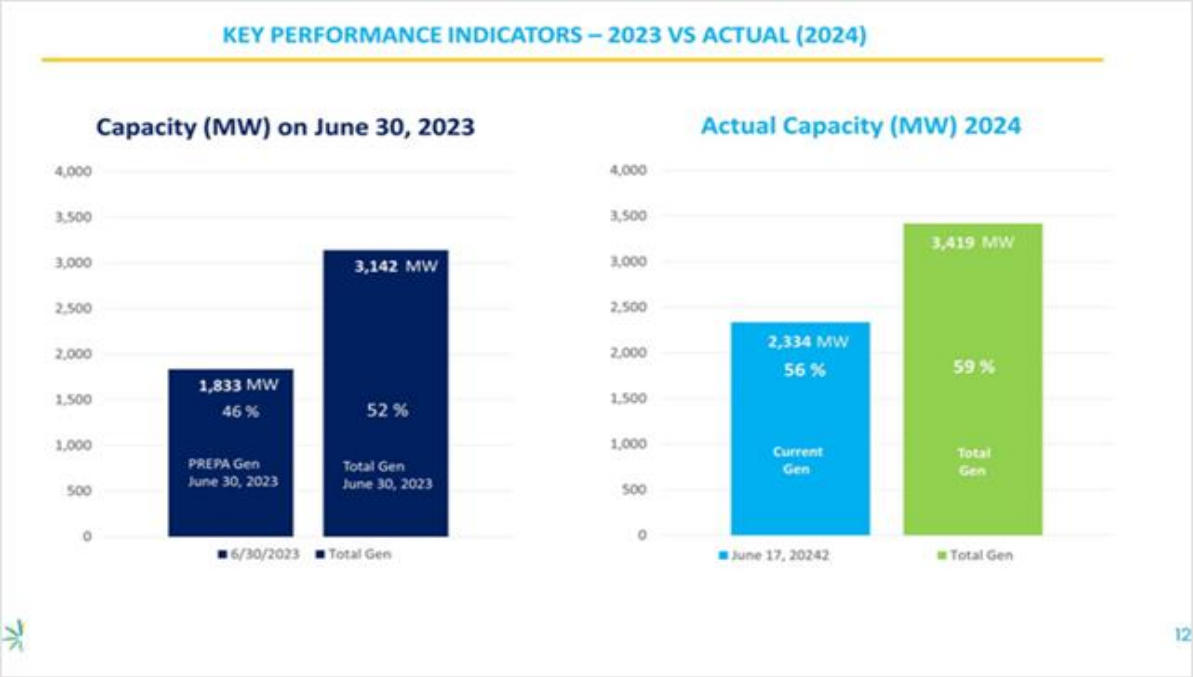
- The Palo Seco unit 4 Forced Outage repairs are still in process. The unit is expected to return to service in August 2025.

Aguirre Unit 1' s catastrophic failure in the generator causing a forced outage on February 14, 2025. The repair scope is under development and negotiations with the OEM are in progress. Expected Time repair (ETR) July 2026.



GPR–PREB–NEPRMI20210014–20240226 #2

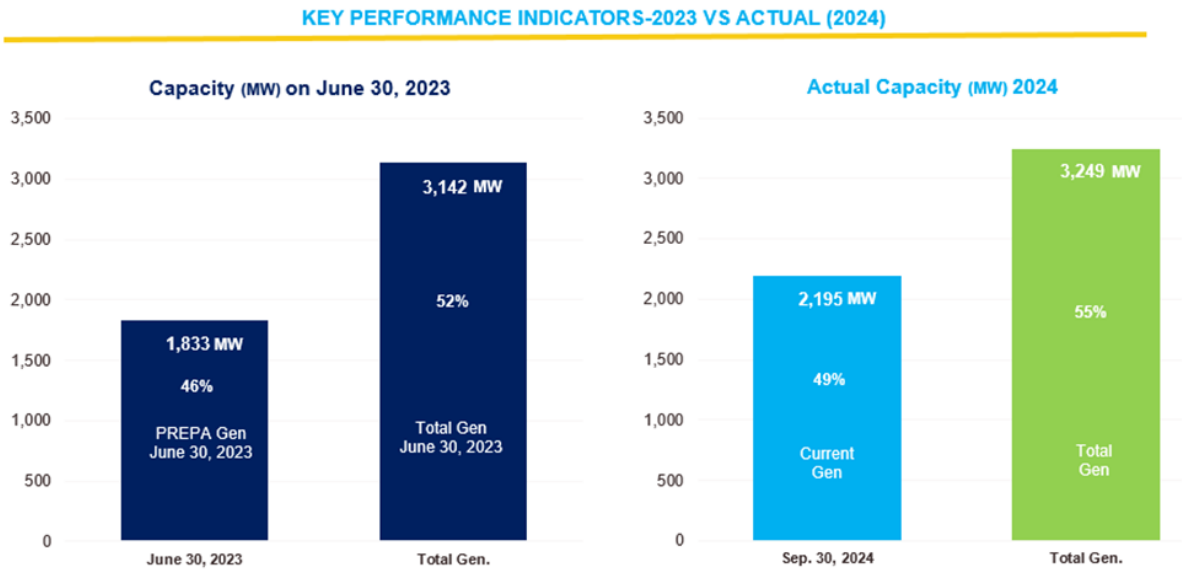
2. Report on Genera's progress in achieving the Expected Results Increase in availability: 17% = 340 MW as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.



The graphic above shows that Genera's unit availability has improved by 0%, from 1833 MW to 2334 MW. See answer to GPR–PREB–NEPRMI20210014–20240226 #1.

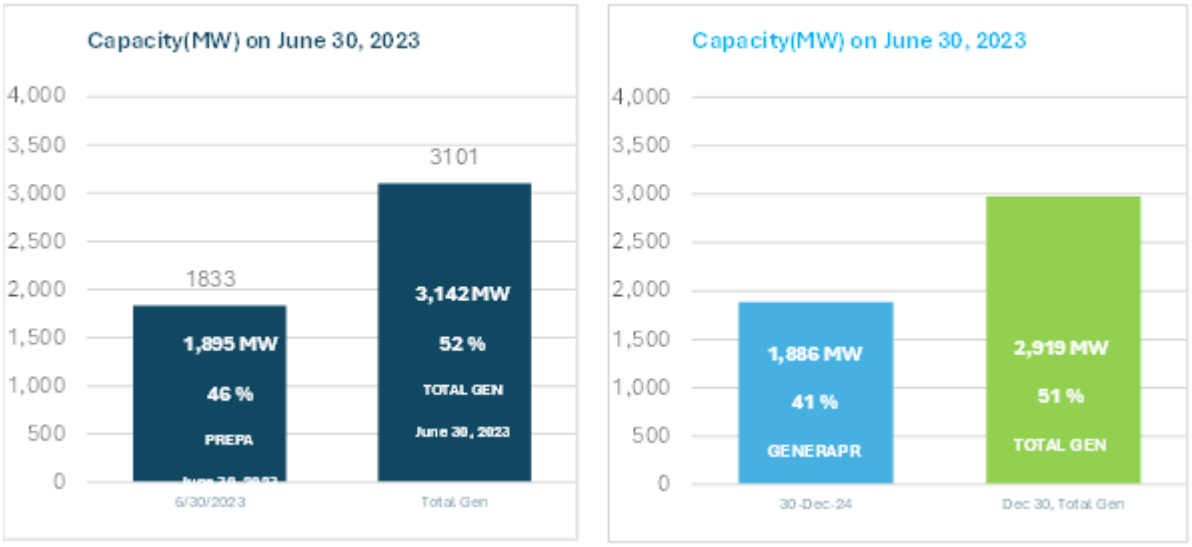
See updated response below

Q2 Updated Response:



The graphic above shows that Genera's unit availability has improved by 17% from 1833 MW to 2195 MW. See answer to GPR–PREB–NEPRMI20210014–20240226 #1.

The equivalent availability of Genera's generation fleet was 41% for the second quarter. Historically, the second and third quarters experience the lowest



energy demand in the country. During these periods, most scheduled maintenance activities are carried out on the power plants.

Generating Station		Available Generation (MW)	NOTES
San Juan	CT 5	120	
	STG 5	-	Maintenance
	CT 6	-	Major Maintenance
	STG 6	-	FO - Repair
	7	-	FO - Repair
	9	-	Environmental Maintenance
Palo Seco	3	120	
	4	-	FO - Repair
Aguirre	1	-	FO - Repair
	2	-	FO - Repair
Costa Sur	5	222	
	6	370	
Total GeneraPR - Base Generation		**832**	
Aguirre Combined Cycle		250	
Peaking Units (PS, AG, CS, VB, Jobos, Yab. & Dag.)		125	
San Juan TM (Trailer mounted)		225	
Palo Seco TM (Trailer mounted)		90	
PS MP PW FT-8 (Mobilepac)		79	
Mayaguez Gas turbine		122	
Cambalache Gas turbine		150	
GeneraPR - Total Generation		**1,886**	
AES		454	
Ecoelectrica		566	
Hydroelectric		13	
Renewables		-	
System - Grand Total		**2,919**	
Peak Demand (Forecast)		**2,475**	
Reserve		**444**	
Peak Demand Previous Day		**2,252**	

DAILY GENERATION AVAILABILITY REPORT

LUMA is not responsible for generation and is providing this report as part of service to our customers.
The report shows the availability generation as reported daily by each generator.

12/30/2024

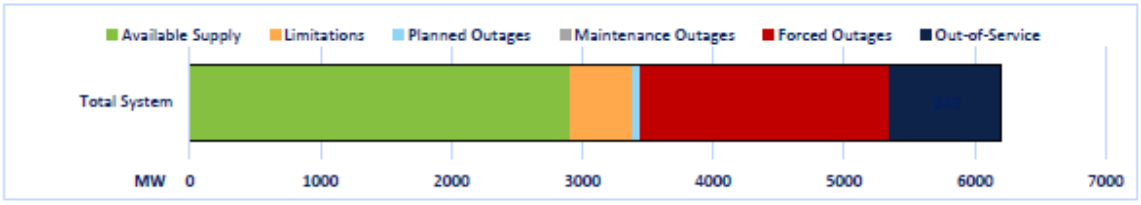
Projected System Availability and Reserves

2,250 PEAK DEMAND	670 REQUIRED RESERVES	1 RESERVES SHORTFALL	
2,919 AVAILABLE SUPPLY	669 AVAILABLE RESERVES	47% AVAILABILITY RATE	

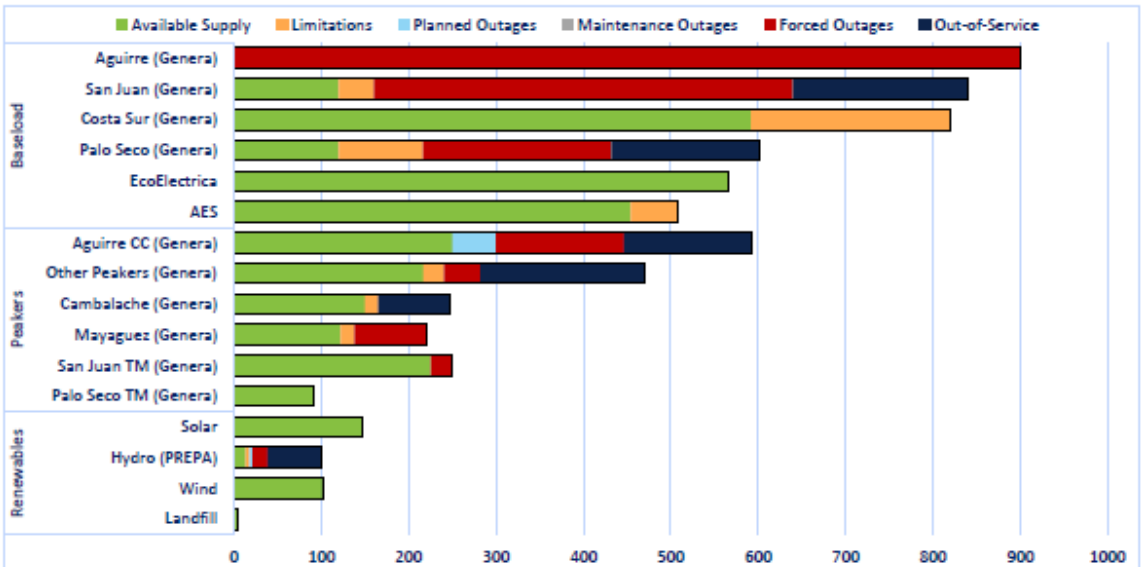
*all units are shown in MW

Previous Day	12/29/2024
Min. Demand 1,435 MW	Time: 1:01 PM
Peak Demand 2,087 MW	Time: 6:38 PM
Total Generation 37,768 MWh	

System Availability and Status



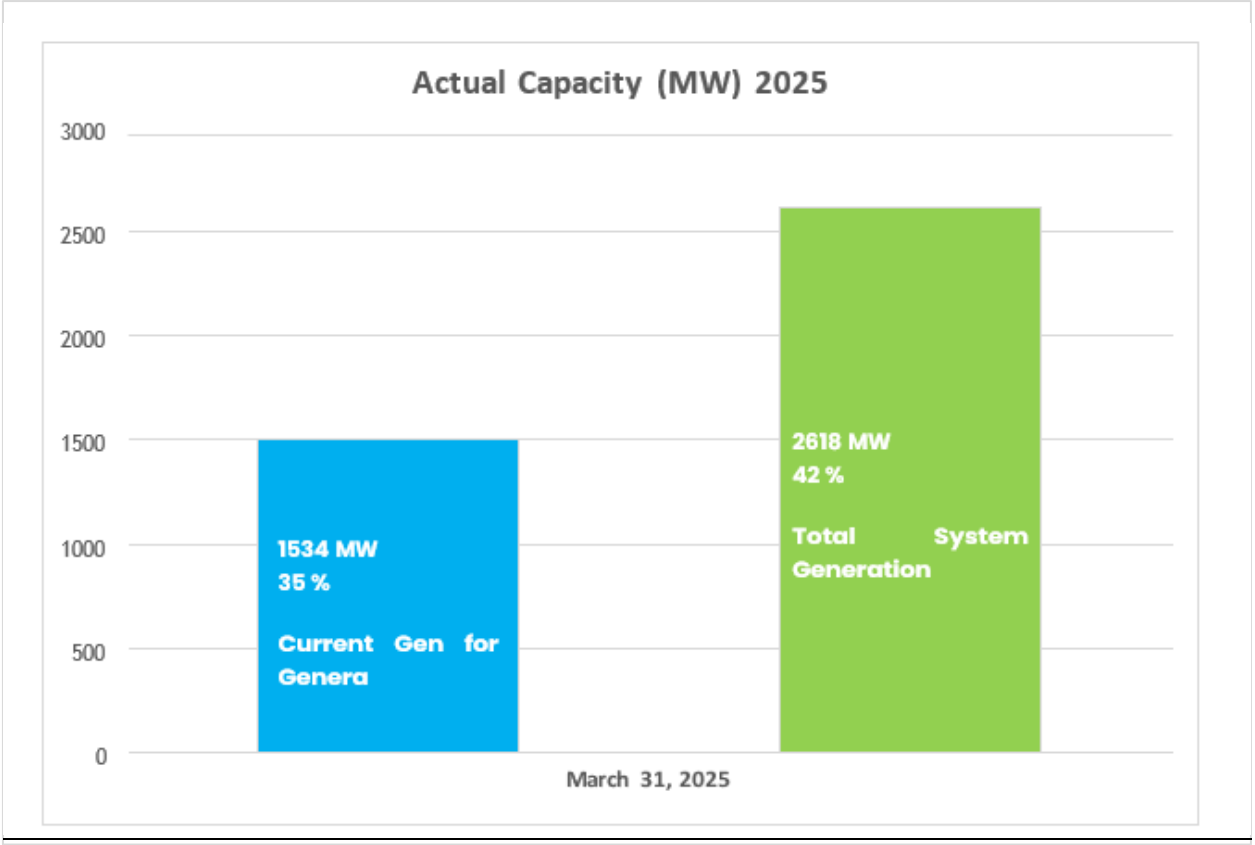
Availability and Status as reported by each Generator



	Renewables				Peakers						Baseload					
	Landfill	Wind	Hydro (PREPA)	Solar	Palo Seco TM (Genera)	San Juan TM (Genera)	Mayaguez (Genera)	Cambalache (Genera)	Other Peakers (Genera)	Aguirre CC (Genera)	AES	EcoElectrica	Palo Seco (Genera)	Costa Sur (Genera)	San Juan (Genera)	Aguirre (Genera)
Available Supply	5	101	13	147	90	225	122	150	217	250	454	566	120	592	120	0
Limitations	0	0	4	0	0	0	16	15	23	0	54	0	96	228	40	0
Planned Outages	0	0	4	0	0	0	0	0	0	50	0	0	0	0	0	0
Maintenance Outages	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Forced Outages	0	0	17	0	0	25	83	0	42	146	0	0	216	0	480	900
Out-of-Service	0	1	61	0	0	0	0	83	189	146	0	0	170	0	200	0
Installed Capacity	5	102	100	147	90	250	220	248	471	592	508	566	602	820	840	900

MW

Q3 Updated Response:



As of March 31, 2025, the equivalent availability of Genera's generation fleet stood at 35% for the third quarter. Historically, the second and third quarters coincide with the lowest energy demand periods in Puerto Rico. During these months, GeneraPR carries out scheduled maintenance across various generation units to prepare for the summer season, hurricane season, and periods of high demand. This planned maintenance activity temporarily impacts overall fleet availability. Notably, units that have undergone repairs and are now demonstrating improved reliability include San Juan Units 6, 7, and 9, as well as Costa Sur Unit 5.

	Executive Summary Status Report 3/31/25			System
	Power Station	Unit	Capacity (MW)	Available Capacity
Base Units	Base Generation			
	San Juan	CT 5	160	160
		STG 5	60	50
		CT 6	160	0
		STG 6	60	0
		7	100	0
		9	100	100
	Palo Seco	3	216	
		4	216	0
	Aguirre	1	450	0
		2	450	0
	Costa Sur	5	410	0
		6	410	350
	Subtotal	24%	2792	660
Peaker's	Reserve Generation Fleet			
	Aguirre Combine Cycle		592	150
	Peaking Units (PS,AG,CS,VB,Job,Yab,& Dag)		315	121
	San Juan Trailer Mounted (TM)		250	200
	Palo Seco Trailer Mounted (TM)		90	69
	Palo Seco Mobile Pac (MP PW FT-8)		81	81
	Mayaguez Gas Turbine		220	97
	Cambalache Gas turbine		248	156
	Subtotal	49%	1796	874
Genera Total				1534
Others	AES			508
	Ecoelectrica			566
	Hydroelectric			10
	Renewables			0
	Subtotal	Values provided by Luma		1084
System - Grand Total				2618
Peak Demands (Forecast)				2475
Reserve				143
Previous day Peak				2231

DAILY GENERATION AVAILABILITY REPORT

LUMA is not responsible for generation and is providing this report as part of service to our customers.
The report shows the availability generation as reported daily by each generator.

3/31/2025

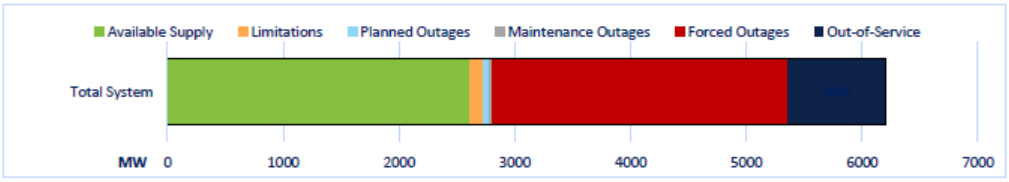
Projected System Availability and Reserves

2,450 PEAK DEMAND	650 REQUIRED RESERVES	482 RESERVES SHORTFALL
2,618 AVAILABLE SUPPLY	168 AVAILABLE RESERVES	42% AVAILABILITY RATE

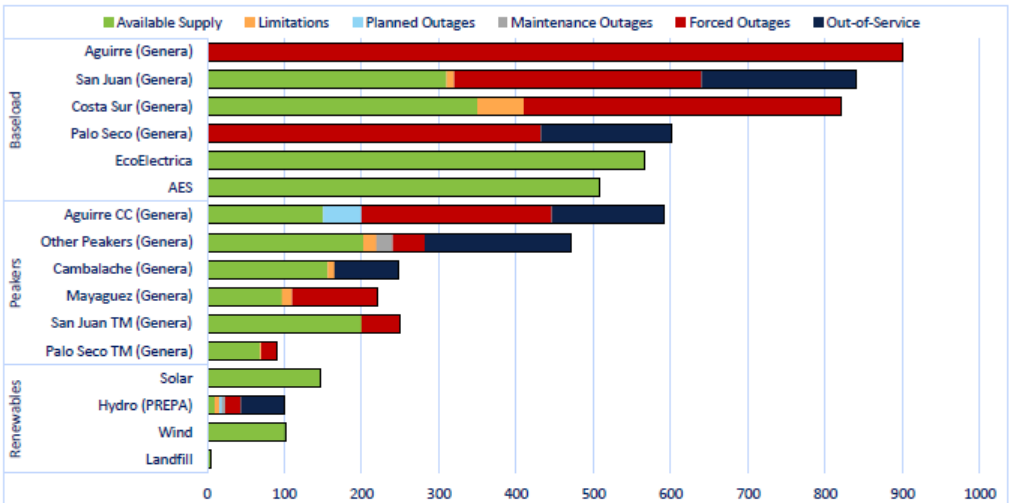
*all units are shown in MW

Previous Day	3/30/2025
Min. Demand 1,546 MW	Time: 12:05 PM
Peak Demand 2,232 MW	Time: 8:39 PM
Total Generation 39,403 MWh	

System Availability and Status



Availability and Status as reported by each Generator

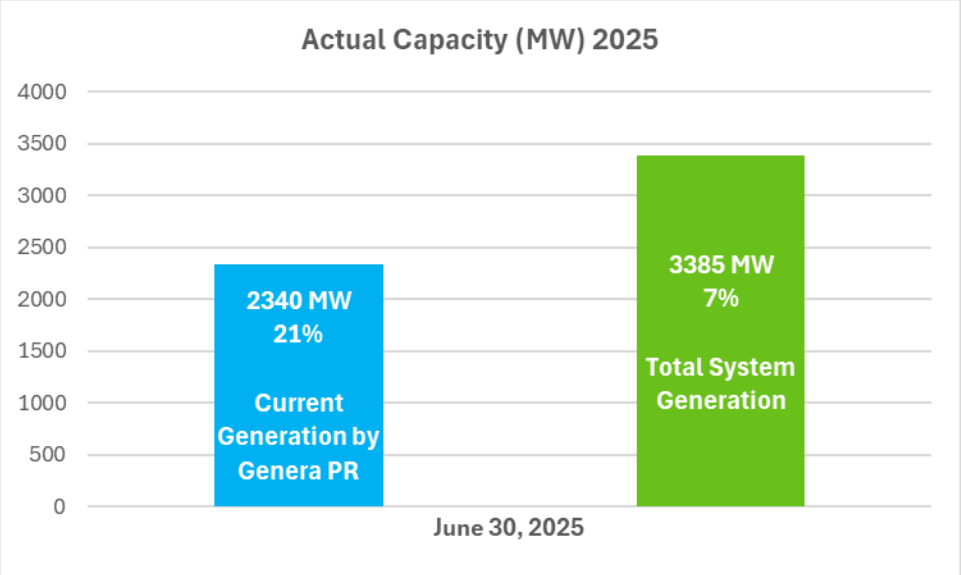


	Renewables				Peakers						Baseload					
	Landfill	Wind	Hydro (PREPA)	Solar	Palo Seco TM (Genera)	San Juan TM (Genera)	Mayaguez (Genera)	Cambalache (Genera)	Other Peakers (Genera)	Aguirre CC (Genera)	AES	EcoElectrica	Palo Seco (Genera)	Costa Sur (Genera)	San Juan (Genera)	Aguirre (Genera)
Available Supply	5	101	10	147	69	200	97	156	202	150	508	566	0	350	310	0
Limitations	0	0	6	0	1	0	13	9	17	0	0	0	0	60	10	0
Planned Outages	0	0	4	0	0	0	0	0	0	50	0	0	0	0	0	0
Maintenance Outages	0	0	4	0	0	0	0	0	21	0	0	0	0	0	0	0
Forced Outages	0	0	20	0	20	50	110	0	42	246	0	0	432	410	320	900
Out-of-Service	0	1	56	0	0	0	0	83	189	146	0	0	170	0	200	0
Installed Capacity	5	102	100	147	90	250	220	248	471	592	508	566	602	820	840	900

MW

Q4 Updated Response:

The graphic below shows that Genera's unit availability has improved by 21% from 1833 MW to 2340 MW. See answer to GPR–PREB–NEPRMI20210014–20240226 #1.



	Executive Summary Status Report 6/30/2025			System
	Power Station	Unit	Capacity (MW)	Available Capacity
Base Units	Base Generation			
	San Juan	CT 5	160	152
		STG 5	60	50
		CT 6	160	160
		STG 6	60	0
		7	100	0
		9	100	98
	Palo Seco	3	216	**140**
		4	216	**0**
	Aguirre	1	450	**0**
		2	450	**350**
	Costa Sur	5	410	**265**
		6	410	**255**
	Subtotal	53%	2792	**1470**
Peaker's	Reserve Generation Fleet			
	Aguirre Combine Cycle		592	298
	Peaking Units (PS,AG,CS,VB,Job,Yab,& Dag)		315	76
	San Juan Trailer Mounted (TM)		250	200
	Palo Seco Trailer Mounted (TM)		90	90
	Palo Seco Mobile Pac (MP PW FT-8)		81	81
	Mayaguez Gas Turbine		220	48
	Cambalache Gas turbine		248	77
	Subtotal	48%	1796	**870**
Genera Total				**2340**
Others	AES			474
	Ecoelectrica			566
	Hydroelectric			5
	Renewables			0
	Subtotal	Values provided by Luma		**1045**
System - Grand Total				**3385**
Peak Demands (Forecast)				**2831**
Reserve				**554**
Previous day Peak				**2726**

GPR–PREB–NEPRMI20210014–20240226 #3

3. Report on Genera's success in accurately predicting and achieving scheduled Regular Maintenance Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

Response:

Since Genera commencement day, the following programmed outages have been performed:

1. Costa Sur Unit 5 Major Maintenance: This unit outage began in July 2023. However, delays related to contract change orders and lead times impacted the scheduled timeframe for this maintenance.
2. Costa Sur Unit 6 Environmental Outage: This scheduled outage commenced in January 2024. The maintenance was affected by the failure of the emergency station service transformer and the normal service station transformer 6B. This matter triggered new contract requisitions to replace, test and commission these transformers.
3. Palo Seco Unit 3 Major Inspection: This scheduled outage started in November 2023. This works included major maintenance of the turbines, the main power transformer, auxiliary equipment, and the replacement of the economizer. The contractors in charge of performing this maintenance faced delays due to changes in the scope of work since damage to the rotor was more extensive than expected, execution challenges, and lead times for major components.

Q1 Response:

According to the Outage Schedule no units are programed for maintenance during the reported quarter. An update on the units reported last quarter is included:

1. Costa Sur Unit 5 Major Maintenance: This outage began in July 2023. However, delays related to contract change lead times impacted the scheduled timeframe for this maintenance. An outage is scheduled for January 2025 to install the air heater baskets which are considered critical components.

2. Costa Sur Unit 6, Environmental Outage: Completed on May 10, 2024.

3. Palo Seco Unit 3 Major Inspection: Completed on July 18, 2024.

Q2 Updated Response:

Key scheduled outages and delays during the second quarter include:

1. San Juan Unit 5 had a scheduled outage for a borescope inspection during the second week of November, lasting one week.
2. San Juan Unit 7's maintenance was extended from March 2025 to May 2025 due to procurement process issues.
3. San Juan Unit 9 was taken out of service one week later than planned due to the borescope inspection of San Juan 5.
4. Costa Sur Unit 5's maintenance was postponed from January 2025 to February 2025 due to delays at the Aguirre Steam Plant.
5. Aguirre Unit 1 scheduled outage for generator hydrogen leak repairs was delayed from November 7 to November 27, 2025, due to the Puerto Rico election process.
6. Aguirre Unit 2 programmed outage was delayed from December 1 to December 30, 2024, due to hydrogen leaks detected by General Electric during final tests. by General E.

Q3 Updated Response:

Key scheduled outages and delays during the third quarter include:

1. San Juan Unit 6 CT had a mayor scheduled outage beginning August 2024 to April 2025. The ST unit was delay until finish hurricane season November – December 2025.
2. San Juan Unit 7's maintenance was extended from March 2025 to August 2025 due to procurement process issues.
3. Costa Sur Unit 5's begins environmental maintenance on March 1 until May 1 2025 to replace air heater baskets, repair air heater trunnions and made the environmental inspections tasks.
4. Aguirre Unit 1 was a catastrophic failure on February 14, 2025. The generator and stator need a mayor repair. The ETR is on June 30, 2026. We conduct all mayor assessments to define a schedule for the forced outage.
5. Aguirre Unit 2 have a failure on the generator on February 1, 2025. We inspect the rotor and prepare a contract to inspect and repair the generator rotor with the OEM (General Electric). We don't have an ETR until we finish the inspection and test.

Q4 Updated Response:

Key scheduled outages and delays during the third quarter include:

1. San Juan Unit 6 major outage was completed on May 8, 2025. Unit is in service in simple cycle mode with a capacity of 160 MW.
2. San Juan Unit 7's maintenance was extended from August 2025 to December 2025 due to additional findings in the low pressure turbine rotor.
3. Costa Sur Unit 5 environmental maintenance was completed on May 1st as planned. The unit can generate 405 MW using bunker C or Natural gas.

GPR–PREB–NEPRMI20210014–20240226 #4

Report on Genera's success in accurately predicting and achieving scheduled Critical Component Replacement Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

Response:

Issues that are impacting the critical components replacement program timeframes are the following:

1. Difficulties in getting the technical specs of critical components due to old equipment and lack of support from OEMs & suppliers delayed the process.
2. Long lead times for the equipment from suppliers (1 – 2 years).

Q1 Response:

Technical specs were obtained from different sources which allows to procure parts needed for regular maintenance. Long lead times continues to present a constrain.

Q2 Updated Response:

There are 70 critical components in various stages of the procurement process:

- 48 items have vendors already selected.
- 9 items have closed requests for proposals.
- 6 items are in the evaluation process.
- 7 items have open requests for proposals.

Q3 Updated Response:

As of the reporting date, Genera has made progress in implementing the Critical Component Replacement Program as outlined in the *Generation Fleet Outage Schedule – Planned Maintenance and Critical Component Replacement Program*. While some delays have occurred, Genera remains committed to executing this program in alignment with established schedules, subject to vendor availability and procurement outcomes. The current status is as follows:

- 39 items have had vendors selected and are proceeding according to procurement and installation schedules.
- 21 items have completed the request for proposal (RFP) process and are in various stages of contracting and execution.
- 5 items received no bids and will be reissued to ensure proper vendor participation and competitive pricing.
- 4 items fall under other categories.

Any deviations from the original schedule have primarily resulted from limited vendor response, extended lead times for critical components, and necessary revisions to technical specifications. Genera continues to work proactively to mitigate delays and ensure the timely replacement of critical components across the fleet.

Q4 Updated Response:

No updates.

GPR–PREB–NEPRMI20210014–20240226 #5

Report on incidents of unplanned outages in Genera's Generation Fleet, including reason for outage, duration of outage, generation plant unit experiencing the outage, and how the duration of the outage was affected by availability or unavailability of Consumables, Spare Parts, and Capital Spare Parts.

Response:

See attachments GPR–PREB–NEPRMI20210014–20240226 #5.

Q1 Response:

No Changes

Q2 Updated Response:

Please see attachment GPR–PREB–NEPRMI20210014–20240226 #5.

Q3 Updated Response:

Please see attachment GPR–PREB–NEPRMI20210014–20240226 #5.

Q4 Updated Response:

Please see attachment GPR–PREB–NEPRMI20210014–20240226 #5.

Unit	Description	Out Date	Duration (Hrs)	Corrective Action
Aguirre CC 1-2	Reduction gear	16-Apr-25	5.5	Outage was performed for inspection of accessory box. Correction was completed.
Costa Sur 6	Other switchyard or high voltage system problems - external	16-Apr-25	28.23	Problem was corrected and Unit was successfully synchronized.
Palo Seco 3	Transmission line	16-Apr-25	13.92	Unit was cleared to go back online.
San Juan 9	Other tube slagging or fouling	14-Apr-25	32.6	Issue was corrected and Unit reincorporated to the electrical system.
San Juan 9	Switchyard system protection devices - external (OMC)	16-Apr-25	11.9	Issue was corrected and Unit reincorporated to the electrical system.
San Juan CT 5	Switchyard system protection devices - external (OMC)	16-Apr-25	7.9	Issue was corrected and Unit reincorporated to the electrical system.
San Juan CT 5	Other oil and gas fuel supply problems	18-Apr-25	1.2	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Switchyard system protection devices - external (OMC)	16-Apr-25	12.4	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Other oil and gas fuel supply problems	18-Apr-25	4.0	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Other hydraulic system problems	29-Apr-25	2.2	Issue was corrected and Unit reincorporated to the electrical system.

Unit	Description	Out Date	Duration (Hrs)	Corrective Action
Aguirre CC 2-1	Vibration of the turbine generator unit that cannot be attibuted to a specific cause such as bearings or blades	31-May-25	1.4	Sensor signal was forced to be worked on later due to high heat in the Unit and needed for electrical system.
Cambalache 3	Spacers	23-May-25	202.5	Turbine disk 3 vane was fixed.
Costa Sur 5	Waterwall (Furnace wall)	8-May-25	67.82	Boiler issue was fixed and unit was put back in service.
Costa Sur 5	Other turbine instrument and control problems	13-May-25	8.95	Vacuum trip switch was fixed and unit was put back in service.
San Juan CT 5	Startup bypass system piping	5-May-25	45.8	Issue was corrected and Unit reincorporated to the electrical system.
San Juan CT 5	Other oil and gas fuel supply problems	15-May-25	1.9	Issue was corrected and Unit reincorporated to the electrical system.
San Juan CT 6	High pressure bearings	9-May-25	175.2	Issue was corrected and Unit reincorporated to the electrical system.
San Juan CT 6	High pressure bearings	18-May-25	14.3	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Startup bypass system piping	5-May-25	44.0	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Other oil and gas fuel supply problems	15-May-25	4.0	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Other lube oil system problems	23-May-25	1.07	Issue was corrected and Unit reincorporated to the electrical system.

Unit	Description	Out Date	Duration (Hrs)	Corrective Action
Aguirre 2	Other miscellaneous generator problems	1-Jun-25	426	Insulation of the generator's rotor was changed.
Aguirre 2	Platen superheater	24-Jun-25	76	Boiler was repaired.
Aguirre CC 1-2	Vibration of the turbine generator unit that cannot be attributed to a specific cause such as bearing or blades	1-Jun-25	13.4	Sensor was changed and installed in the cabin due to high temperature of the turbine.
Aguirre CC 1-2	Vibration of the turbine generator unit that cannot be attributed to a specific cause such as bearing or blades	1-Jun-25	9.9	The sensor was properly secured.
Aguirre CC 2-1	Other fuel system problems	4-Jun-25	0.7	Electrical fuel valve 20FD was found closed. It was forced open and the next day, the solenoid was changed.
Costa Sur 6	Hydraulic system coolers	18-Jun-25	19.73	System coolers were replaced and oil was changed.
Palo Seco 3	Waterwall (Furnace wall)	16-Jun-25	50.58	Broken tubes were replaced. Weld and leak was fixed.
Palo Seco 3	Other fuel quality problems (not OMC)	19-Jun-25	128.58	Isolated tanks S1 and S4 which had problems with fuel viscosity.
San Juan CT 5	Hydraulic oil system	17-Jun-25	2.4	Issue was corrected and Unit reincorporated to the electrical system.
San Juan ST 5	Hydraulic oil system	17-Jun-25	10.2	Issue was corrected and Unit reincorporated to the electrical system.

II. Consumables, Spare Parts and Capital Spare Parts Inventory

C1. Genera Supply Chain

GPR–PREB–NEPRMI20210014–20240226 #C1

Detail and quantify the results of Genera's Supply Chain strategy used to achieve priority changes and improve warehouse operations and control of spare parts, consumables, and equipment inventory, reflecting Prudent Utility Practice, using the "lean" and "agile" systems identified in Genera's July 26 Motion, Appendix A.

Response:

Genera's main strategy is to achieve supply chain objectives using lean and agile systems. Part of this objective is to submit activities reports describing actions taken during the quarter to facilitate improvements related to warehouse operations and control of spare parts, consumables, and equipment inventory.

When Genera began operations under the Shared Services Agreement with LUMA on July 1, 2023, there were challenges as changes to the availability of the business intelligence module used by PREPA were made. This resulted in Genera not having metrics and performance reports on maintenance, inventory, purchases, contracts, and invoice matching for plant maintenance. After a couple of months, LUMA began developing new reports based on existing reports.

To achieve this goal, Genera's Warehouse Department will report every month on the operations in all warehouse facilities, reflecting the inventory at the end of each month, all warehouse transactions during the period, the inventory movement in each warehouse, and all activities of proper storage, minimal

handling, efficient management, inventory controls, and waste elimination, achieving low-cost on-time delivery.

In addition, Genera's Supply Team will act prospectively and agilely to manage the complexity brought about by constant and unpredicted changes and demands of our suppliers and end users. The team will aggressively apply the Procurement Manual guides to comply with all the requirements established in the manual and ensure an efficient replenishment of all the parts in the inventory

Q1 Previous Response:

GeneraPR relies on this date on the Shared Services Agreement with LUMA. Genera can't update any of its inventories or develop new reports for the management of its inventories. When Genera needs to make changes to specifications of existing material or create new material, it has to go thru LUMA Shared Services which has full control over the system. Warehouse supervisors do not have access rights to make changes to material specifications in real time. Genera must create a service ticket to LUMA to perform all updates to our inventory system, this service takes 5 working days to complete.
Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the Share Services Agreement (SSA) to end by January 15, 2025.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA.

Q3 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA.

Separation commence date was March 1, 2025. IT Department working on glitches on system to customize to Genera use.

Q4 Updated Response:

The IT Department is currently addressing system glitches to customize the Asset Suite 9 platform for Genera's operational use.

No other changes are reported for the fourth quarter.

C2. Reliability Centered Management Program

GPR–PREB–NEPRMI20210014–20240226 #C2

Detail the status of the development and implementation of Genera's Reliability Centered Management Program and Genera's success in accurate scheduling and tracking programs to manage inventory for the three identified major elements of Preventive Maintenance, Predictive Maintenance, and Corrective Maintenance.

Response:

The major elements of Genera's Maintenance Program are Preventive Maintenance, Predictive Maintenance and Corrective Maintenance.

Plant maintenance for all facilities will be developed and conducted following the Plant Maintenance Manual, vendor technical manuals, and sound engineering practices. These programs will be scheduled and tracked by utilizing an Enterprise Asset Management system.

Genera understands that having administrator rights to Asset Suite would also improve the business's overall performance, allowing full control of the security and maintenance of the master inventory catalog, preferences, and system configuration codes.

Also, Genera does not have a training environment to conduct the appropriate maintenance, inventory, and purchasing management training.

To implement the work management system to support reliability, the following steps need to be executed in the Asset Suite System:

1. Do a complete review and configuration of the equipment hierarchy and add the critical components identified by Genera to the equipment.

This requires system administration and database privileges for quality control queries and mass updates.

a. During this configuration, preventive maintenance requirements, equipment accounting, and the bill of materials will be reviewed, synchronizing critical components with their respective warehouse codes.

2. To update the stock catalog audit that Genera carried out in the warehouses and create new catalogs to monitor their purchase and installation up to the warehouse through capitalization in Asset Suite (EAM). This new process requires system administration privileges to configure this accounting, perform tests in a test system, have Finance approve the accounting effect of the transactions, and configure the process in production.

3. Genera has a contract for predictive maintenance technologies, vibrations, infrared thermography, and ultrasound. This system (Smart CBM) must be integrated with the Asset Suite maintenance module to maintain the equipment's history using this technology.

4. Once we can access the database, we will build operational reports and KPIs based on the equipment's health and reliability to support the power plant's outage plan and optimize inventory.

The 'Inventory Module' – Warehouse Management System – (WMS) will manage plant inventory, including warranty parts, repair parts (stock and non-stock), consumables, plant chemicals, etc. With proper utilization of the Inventory Module, plant staff can quickly find a spare part and determine if it is in stock, including the quantity on hand and the exact stock location (warehouse, row, shelf, and bin location information).

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA.

Q3 Updated Response:

No updates.

Q4 Updated Response:

The IT Department is currently addressing system glitches to customize the Asset Suite 9 platform for Genera's operational use.

No other changes are reported for the fourth quarter.

C3. Managing Obsolete Parts

GPR–PREB–NEPRMI20210014–20240226–ATTA #C3(a)(i)

3. Detail Genera's success in managing obsolete spare parts in the short, medium, and long term based on the following timeframe:

a. 6 months

i. Status of the detailed inventory audit.

Response:

1. Forensic Inventory Audit - Completed

a. A forensic inventory audit was conducted by the Warehouse Team with the assistance of the Operation Team in all four Warehouses for item parts (SKUs) that had no movement for more than 10 years.

See GPR-PREB-NEPRMI20210014-20240226-ATTA#3(a)(i) Certified Obsolete SKU's.pdf

3. Certified Obsolete Materials – Completed

See GPR-PREB-NEPRMI20210014-20240226-ATTA#3(a)(i) Certified Obsolete SKU's-Warehouse_16_Palo_Seco.pdf
See GPR-PREB-NEPRMI20210014-20240226-ATTA#3(a)(i) Certified Obsolete SKU's-Warehouse_19_San_Juan.pdf
See GPR-PREB-NEPRMI20210014-20240226-ATTA#3(a)(i) Certified Obsolete SKU's-Warehouse_ 43_Aguirre.pdf
See GPR-PREB-NEPRMI20210014-20240226-ATTA#3(a)(i) Certified Obsolete SKU's-Warehouse_ 59_Costa_Sur.pdf

Once the LUMA Shared Service Agreement ends, Genera can configure the inventory system to record all documented obsolescence transactions. A virtual investment recovery warehouse will be created to recover losses due to surplus, obsolescence, or damaged materials.

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA.

Q3 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the Share Services Agreement (SSA). (IT is working on glitches on system to customize to genera use.)

Q4 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA. (IT is working on glitches on system to customize to genera use.)

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ii. Status of the plan to eliminate redundancies, cancel standing orders, return, well or write off obsolete spare parts and equipment.

Response:

The Warehouse team is working together with the Operations team to understand the essential needs for the operation and maintenance of the Legacy Generation Assets. Spare parts and equipment could be classified as obsolete or surplus, which are being identified for proper disposal. Since this is movable property owned by PREPA, we are also working on developing and establishing a process, according to applicable law and regulation, for their proper disposal and write-off.

There are also multiple meetings to identify the best business practices that can be implemented. For example, when a part request is made. If the necessity cannot be supplied by the warehouse either because the item is not codified or is out of stock, then it is the warehouse's responsibility to make the order for the replenishment of the inventory and to cover the request. To accomplish this objective, the history of the inventory movement is being reviewed and adjusted according to the need. This reduces the purchase of unnecessary items or redundancies between the operation and the warehouse.

Additionally, Warehouse is tracking the orders and requests made to the Procurement team in accordance with the actual inventory. To that end, Warehouse is canceling any standing order for items that do not have long lead times and are either in the warehouse or available through a Master Purchase agreement. The main focus is to have a sufficient inventory of parts and equipment required for the daily operation of Legacy Generation Assets.

Q1 Response:

Additional efforts to make a more lean and efficient process were implemented by Genera. Genera has decided to channel all material requests, whether codified or not, through the Warehouse. By all operational petitions through Warehouse, we can better track, account for and minimize redundancies and standing orders.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No changes.

Q4 Updated Response:

No updates.

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b. 12 - 24 months

i. Division of warehouse inventory into the identified categories.

Response:

The Warehouse is identifying efficiencies in the way the purchases are made and how parts and equipment are stored according to the category. To that end, Genera is updating the Asset Suite platform to include all the categories identified for parts and equipment, which will provide more visibility for the type of requests or purchases made. Asset Suite is the tool used to request and track a purchase order.

Aside from further classifying the purchases, the warehouse personnel are also divided into categories. This allows a better understanding of the requests from the Operations Department and is more specialized in the market conditions and constraints, which allows us to react accordingly and helps us to prevent unnecessary or emergency purchases.

Q1 Response:

The Warehouse is identifying efficiencies in the way the purchases are made and how parts and equipment are stored according to the category. To that end, Genera is updating the Asset Suite platform to include all the categories identified for parts and equipment, which will provide more visibility for the type of requests or purchases made. Asset Suite is the tool used to request and track a purchase order.

Aside from further classifying the purchases, the warehouse personnel are also divided into categories. This allows a better understanding of the requests from the Operations Department and is more specialized in the

market conditions and constraints, which allows us to react accordingly and helps us to prevent unnecessary or emergency purchases.

Q2 Updated Response:

As part of the disposition process ofobsolete materials from the four warehouses, materials are being relocated to a dedicated warehouse at the Aguirre Power Plant, pending authorization from PREB and P3A to complete the process. This includes packing, identification, and labeling of all containers and pallets.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

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ii. Tracking and monitoring the proper demand forecasting tool for spare parts, equipment, and consumables.

Response:

There are weekly meetings among the Warehouse, the Operations plant managers and the Procurement teams. These meetings allow for coordinating scheduled outages and repairs to prioritize orders, keep track of inventory movement, and timely and effective re-stocking of essential parts, spare parts and consumables, among other things.

Additionally, the changes to incorporate in Asset Suite to classify items by category with expected minimum thresholds that should trigger a purchase flag will facilitate the monitoring of the inventory in the warehouse and the need for re-stocking. In parallel, the Genera IT department is working with LUMA to segregate the information database and servers that are managed by LUMA. Under the Shared Services Agreement, LUMA is providing administrative services and support related to Asset Suite. Once segregation is completed, Genera will be able to enhance the reporting mechanisms within Asset Suite. These reports will provide specific information about plant and warehouse requests. These reports will improve forecasting and projections of categorized items. It will also provide insight into lead times, price, and each location's (power plant's) needs.

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

There are ongoing segregation efforts to transfer the data and use of Asset Suite from LUMA to Genera, which will allow Genera to have full access and

control of the tool to make the necessary improvements to track, monitor and create more accurate forecasts.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA. Ongoing segregation efforts are in place to transfer the data and use of Asset Suite from LUMA to Genera, which will provide Genera full access and control of the tool, enabling necessary improvements to track, monitor and create more accurate forecasts.

Q3 Updated Response:

IT is currently working on reporting. At the moment, data is being monitored daily from the front end of Asset Suite.

Q4 Updated Response:

IT is currently working on reporting. At the moment, data is being monitored daily from the front end of Asset Suite.

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iii. Implementation of automatic requisitions when the minimum quantity is reached.

Response:

Genera is operating under a Shared Services Agreement with LUMA in which LUMA provides administration, technical support and contract management over the Asset Suite tool. This creates limitations in the operation and use of the Asset Suite tool. Automatization of the requisitions would improve the warehouse and operations processes.

i. There is a plan to end the Shared Services Agreement and separate the database, administration and management of the tool. This effort will enable Genera to have full access and ownership of the tool to create reports to track and monitor every requisition. Additionally, Genera will be able to start programming or enhancing the tool, looking into additional capabilities and maybe even interfacing with other tools for automatization of the process and better management of requisitions to reduce human interaction when established thresholds are reached to request materials, parts or equipment.

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

There are ongoing segregation efforts to transfer the data and use of Asset Suite from LUMA to Genera, which will allow Genera to have full access and control to the tool to make the necessary improvements.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA. Ongoing segregation efforts are in place to transfer the data and use of Asset Suite from LUMA to Genera, which will provide Genera full access and control of the tool, enabling necessary improvements to track, monitor and create more accurate forecasts.

Q3 Updated Response:

No changes

Q4 Updated Response:

IT is currently working on reporting. At the moment, data is being monitored daily from the front end of Asset Suite.

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C. Replacement Parts

i. Assessment and identification of replacement parts and development of procurement plan with existing suppliers.

Response:

As part of the obligations under the OMA, Genera is required to administer and store, among others, all Consumables, Spare Parts and Capital Spare Parts. This obligation includes maintaining an inventory control program.

Genera performed a physical inventory and review for FY2024 and submitted the inventory list to the PREB. This exercise will be done annually to keep track of the inventory and its movement, monitor the movement, and establish priorities or schedules for future acquisitions. The warehouse team identifies the minimum number of specific parts needed and ensures timely requisition of those parts.

For the needs identified by the inventory review and tracking, the Procurement team is engaging different suppliers that could provide the necessary parts for the operation and maintenance of the Legacy Generation Assets. The procurement plan generally includes (i) identifying and onboarding new vendors who can diversify Genera's vendor portfolio, (ii) tracking vendor performance and incorporating vendor assessments into future procurements, (iii) increasing communication with key vendors and providing feedback to improve customer service and order prioritization, and (iv) moving from one-off and/or plant-specific purchases to master supply agreements and blanket purchase orders, which provide for bulk pricing discounts and broader and more easily managed order placement.

Q1 Response:

No changes.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C3(c)(ii)

i. Process of seeking alternative parts and suppliers for existing replacement parts.

Response:

Genera views increasing vendor interest and competition in procurement processes as an important objective of its procurement team. Genera has two main initiatives: identifying and onboarding new vendors to diversify its vendor portfolio.

Genera's procurement team added a dedicated vendor relations administrator in Q2 2024. A key responsibility of this role is to focus efforts on expanding the vendor base. The vendor relations administrator has identified and onboarded new vendors from affiliate referrals, trade show contacts, market research, RFP responses and other methods.

To supplement its internal vendor relations efforts, Genera also accesses a global supplier network with entities capable of sourcing all major power generation equipment. This external service provides sourcing assistance and referrals for Genera, allowing identification of and connection with potential suppliers often unfamiliar with Puerto Rico, PREPA, or Genera, along with Genera's vendor relations administrator, who can then board those suppliers. Genera's procurement team then includes these vendors in distinct procurement processes conducted in full compliance with its procurement manual. Genera believes that, over time, these two efforts will significantly expand the alternative suppliers able to provide parts and services to Genera and PREPA.

As a final point on vendor counterparties, we also note that Genera generally aims to remove intermediaries from the supplier equation. This is not always possible, but the intention is to engage directly with the supplier under a Master Service (or Supply) Agreement, with the objective of reducing costs and improving warranty support and service.
Regarding the parts themselves, the opportunities for alternatives vary part by part. Genera often seeks both new and refurbished parts, where practical, to cut delivery times and costs. Genera also involves competent engineering firms and subject matter experts in the creation and review of many technical specifications to ensure alternatives are fairly considered.

However, it is not uncommon that the parts needed for many of the Legacy Generation Assets can only be supplied by a specific OEM, either because the part needed for the old legacy unit is outdated (and only available from that source) or because it's subject to IP or warranty restrictions. That is, many of Genera's largest purchases must be made with the original manufacturer to obtain the part that is fit for the purpose. Genera has identified that the technology for certain equipment is not exclusive to the OEM, but it has open competitive processes for the acquisition of the parts, which results in better prices and lead times.

Q1 Response:

No changes.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No changes.

Q4 Updated Response:

No updates

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d. Identify and quantify the space and cost savings for all categories.

Response:

Genera is working on ending the Shared Services Agreement with LUMA to have full access and management of the Asset Suit tool. Additionally, Genera is working on clearly establishing the categories for the parts and materials used in the operation. Even though we have a list of inventories, we need reports from Asset Suite that can clearly set forth the category of the item purchased and the final price of acquisition. This is the first year of Genera's operation, and it can be used as a benchmark for future purchases. However, to identify the savings by category, we need to have full access, control and management of Asset Suite.

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

There are ongoing segregation efforts to transfer the data and use of Asset Suite from LUMA to Genera, which will allow Genera to have full access and control to the tool to make the necessary improvements.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA. Ongoing segregation efforts are in place to transfer the data and use of Asset Suite from LUMA to Genera, which will provide Genera full access and control of the tool,

enabling necessary improvements to track, monitor and create more accurate forecasts.

Q3 Updated Response:

IT is currently working on reporting.

Q4 Updated Response:

Genera continues working on optimizing the Asset Suite 9 platform to align with the Company's operational needs. As part of the ongoing separation from LUMA under the Shared Services Agreement, efforts remain focused on securing full access, control, and customization of the system. This will enable accurate categorization of parts and materials, improve reporting capabilities, and support the identification and quantification of space and cost savings across all categories.

C4. Obtaining Best Part Price

GPR–PREB–NEPRMI20210014-20240226–ATTA #C4

Report on Genera's success in obtaining the best part price through competitive bidding and achievement of the goals of "best quality part fit" and "best part price" through the network source process.

Response:

Genera's Procurement Manual sets forth rules and guidelines that govern the procurement process. Any process that exceeds the simplified acquisition threshold (currently, $250k) must go through open competition. Part acquisitions generally contain detailed specifications that must be met as minimum criteria for their RFP. Price is used as the deciding factor for purchases below the simplified acquisition threshold. For purchases at or above the simplified acquisition threshold, scoring criteria typically focus more on price and delivery times than any other factor. This helps ensure Genera selects the best firm price based on the quality and specifications set out in the RFP and forces the competitors to offer better prices to win the bid. Genera's typical fixed price terms then place the risk of changes due to market fluctuations or instability for suppliers.

The parallel track effort of (i) refining focus on pricing in its procurement processes, (ii) increasing the vendor pool through the efforts, and (iii) consolidating orders to bulk purchases and/or multi-part purchases under MSAs is expected to deliver the best value over time. Genera has a data collection process underway to assess average spending on categories of parts during FY2024, track pricing trends, and compare results for FY2025. These efforts are ongoing but need sufficient time for data to be meaningful.

Q1 Response:

No changes.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

C6. Warehouse Management Software

GPR–PREB–NEPRMI20210014- 20240226-ATTA #C6

a. Detail and quantify Genera's implementation and use of a Computerized Maintenance Management System (CMMS) or Enterprise Asset Management (EAM) to optimize and integrate the maintenance operations of the power facilities.

b. Report on the status of Genera's assessment of technology to use after December 31, 2023, when the shared services agreement including Asset Suite ends.

Response:

Since its commencement, Genera has been using the existing PREPA environments offered by LUMA through shared services. These environments exist on-premises at LUMA-hosted facilities and are offered today through limited use for basic day-to-day operations using the prior PREPA configured setup for the ERP (Enterprise Resource Planning) / EAM (Enterprise Asset Management) environments using the same intermingled Company 01 Institution with PREPA users. This existing environment does not allow Genera to implement any substantial change management to accommodate new options or enhanced processes due to the restrictions imposed by the existing Administration offering. Genera is currently in the process of ending Shared Services with LUMA for all ERP and EAM services using Oracle EBS and Asset Suite Version 9 (AS9) and migrating to a separate instance of these systems to Oracle Fusion Cloud for ERP and AS9 for EAM in its own Cloud Microsoft Azure Tenant environment using PRITS licensing.

This project should have been finalized by the scheduled end of Shared Services date of September 30, 2024, but has recently been re-scheduled and agreed to finalize by February 15th, 2025. Once Genera has control and separate existence of their ERP/EAM environments, these can be used to explore several

options to enhance the existing state of the EAM environment for the management of Warehouse Inventory and Spare Parts using the full features of AS9 instead of the limited existing capabilities as defined and configured for PREPA historically. Also, Genera is prepared to train all personnel to use Asset Suite maintenance, inventory, purchasing, and contracts using power utilities best practices once Genera owns the systems.
Genera intends to explore these enhancements while also evaluating existing replacement solutions for AS9 that may be more suited to the long-term goal and the new industry technology trends, including cloud-based systems, AI (Artificial Intelligence), mobile solutions for user input, reporting, and data feedback. User feedback, budgets, and optimization goals will determine the final solution that Genera will use to update the current state of operations and efficiency in managing these assets.

Q1 Response:

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by January 15, 2025.

LUMA and Genera were unable to complete the segregation efforts to separate data and create independent OT environments for both companies. To complete this process, LUMA and Genera decided to amend and extend the Shared Services Agreement (SSA) to keep working on segregation efforts without interrupting the services.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to the core application separation of Asset Suite 9 have extended.

Q3 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to the core application separation of Asset Suite 9 have extended. (IT is working on glitches on system to customize to genera use.)

Q4 Updated Response:

No updates.

C9. Critical parts

GPR–REB–NEPRMI20210014–20240226–ATTA #C9(a)

a. Report on the status and success of Genera's plans to expedite orders for critical parts with quantity 0.

Response:

After reviewing the inventory, Genera implemented an action plan to replenish the warehouse. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

After identifying the parts, Genera classified them based on units already out of service or scheduled for maintenance and which ones had priority. Additionally, Genera assessed the critical parts that could be purchased using federal funds. After assessing these variables, Warehouse engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

Q1 Response:

Genera has ongoing negotiations with multiple OEMs for Master Supply Agreements to address part needs.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No changes.

Q4 Response:

Following the Master Services procurement process, more than eight agreements have been established to ensure rapid and efficient response capabilities in the event of emergencies or zero-inventory situations.

GPR–PREB-NEPRMI20210014–20240226–ATTA #C9(b)

b. Identify any critical parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

Response:

See answer GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C9(a).

Q1 Response:

Regarding the status of obtaining those parts, please see Q3 updated response to C9(a).

After performing a forensic inventory of all the critical, mayor and minor parts, Genera implemented an action plan to replenish the warehouses. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

The parts were identified and classified based on units already out of service or scheduled for maintenance and which ones had priority. An assessment of the critical parts that could be purchased using federal funds was made. After assessing these variables, the Warehouse Department engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through

the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

GPR–PREB-NEPRMI20210014–20240226–ATTA #C10(a)

a. Report on the status and success of Genera's plans to expedite orders for major and Minor Parts with quantity 0.

Response:

See answer GPR–REB–NEPRMI20210014–20240226–ATTA #C9(a). The process used and the result is the same for critical parts.

Q1 Response:

After reviewing the inventory, Genera implemented an action plan to replenish the warehouse. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

After identifying the parts, Genera classified them based on units already out of service or scheduled for maintenance and which ones had priority. Additionally, Genera assessed the critical parts that could be purchased using federal funds. After assessing these variables, Warehouse engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No changes.

Q4 Updated Response:

Genera has already implemented the issuance of Master Services Agreements (MSAs) and Blanket Purchase Orders (BPOs) as part of its proactive procurement strategy. Following a thorough inventory review, Genera developed and executed an action plan to replenish the warehouse inventories, efficiently and strategically. This included working with Operations to identify and prioritize required parts, avoiding the acquisition of obsolete items, and classifying parts based on equipment status, maintenance schedules, and funding eligibility.

Critical parts available only from OEMs or exclusive suppliers were directly sourced to expedite delivery, while other essential items were procured through strategic sourcing leveraging the MSAs. These agreements allow Genera to issue task orders without repeating the full procurement process, as terms, conditions, and funding are pre-established. This approach ensures faster response times during emergencies or zero-inventory scenarios while maintaining operational readiness.

GPR–PREB-NEPRMI20210014–20240226–ATTA #C10(b)

a. Identify any Major and Minor Parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

Response:

See answer GPR–PREB–NEPRMI20210014–20240226–ATTA #C9(a).
The process used and result is the same for critical parts.

Q1 Updated Response:

After performing a forensic inventory of all the critical, mayor and minor parts, Genera implemented an action plan to replenish the warehouses. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

The parts were identified and classified based on units already out of service or scheduled for maintenance and which ones had priority. An assessment of the critical parts that could be purchased using federal funds was made. After assessing these variables, the Warehouse Department engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already

agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

The process used and result is the same for critical parts.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

C11. Plan to address shortage of critical parts

GPR–PREB–NEPRMI20210014–20240226–ATTA #C11(a)

a. Report on the status and success of Genera's plans to address the shortage of critical parts requiring long lead times.

Response:

Genera has been sourcing the market to understand the lead times for the purchase of critical parts and components. The parts required for these types of overhauls are the ones that typically have long lead times, excluding certain considerations already known by experience or the established life cycle of the critical part or component.
Genera has established weekly meetings among Operations, PMO, Warehouse and Procurement to coordinate efforts between the parties. These meetings have the objective of understanding the maintenance schedules, major repairs, and others, including the critical parts required for their repair and restoration, which allows for better planning between warehouse and procurement. Furthermore, Genera is projecting the maximization of the use of federal funds and the retirement or improvement of the legacy units. By making these projections, Genera also identifies the critical parts and components that will be needed to achieve a project and can start planning their acquisition ahead of time.

Additionally, Genera is sourcing the market for refurbished parts that can be obtained quickly in case of an emergency, or there is no spare part in inventory. Moreover, Genera is negotiating to establish Long Term Service Agreements with certain OEMs. Establishing these agreements creates a stronger relationship with the supplier and reaffirms Genera's compromise in obtaining the parts, which creates trust in a supplier and allows for opportunities like (i) having critical parts owned by the supplier but needed by Genera stored in a Genera warehouse; (ii) having the supplier manufacture and store critical

parts in their warehouse as a spare part, without costs to Genera; (iii) suppliers willing prioritize or to invest in shops in Puerto Rico, among others, that could result in lower lead times.

Q1 Updated Response:

No updates.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C11(b)

b. Report on the status and accuracy of projected timelines and cost estimates.

Response:

Genera's Procurement Manual requires that every small purchase or purchase above the simplified acquisition threshold has a cost estimate before receiving proposals. Genera relies on experience, prior proposals and knowledge of the end user or requestor to perform a cost estimate for the goods or services requested. The accuracy of the cost estimates depends on several factors, including inflation, market fluctuations and the price of raw materials. Genera is also working on acquiring a tool called RS Means. This tool is used by FEMA when calculating reimbursement costs. Even though the cost estimates prepared by Genera are accurate, this will help facilitate and improve the process when there is no previous information on the goods or services to be purchased.

Additionally, unless there is a forced outage or an emergency due to instability or trip of the grid, most of the projections made by Genera have been reasonably accurate. Managing old and outdated units is challenging, notwithstanding, following manufacturer specifications, and making the required maintenance when scheduled allows for more reliable projections of the lifecycle of the spare parts. This, combined with Genera's inventory control program, enables Genera to make more accurate projections for decision making when procuring parts.

Q1 Updated Response:

Genera is still working on the acquisition of RS Means, which will enable us to be more accurate on the expected costs of the items being purchased. Regarding timelines, Genera generally expected most critical parts to be

received in 2025. Based on the latest information coming from procurement processes, this appears reasonably accurate, though the range of estimated delivery times is broad.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C11(c)

c. Describe the effectiveness of procurement procedures.

Response:

Genera has a Procurement Manual which was agreed among P3A, COR3 and Genera. The primary objective of the procurement manual is to follow the necessary steps to obtain federal reimbursement and generally ensure fair and transparent competition.

The manual sets out three main methods for purchases according to the best value of the goods or services. These include (i) Micro Purchase (x<10k); (ii) Small Purchase (10k<250k); and (iii) Above the Simplified Acquisition Threshold (250k<x). Each method has its own process. In summary:

1) Micro Purchase – can award directly to a proponent with just one quote based on the experience of the buyer.
2) Small Purchase – requires at least three quotes and it is awarded to the lowest quote, unless justified by the buyer; and
3) Simplified Acquisition Threshold – must be an open, competitive process published and available to the market for at least ten business days, scored based on criteria set out in the process documents.

Each method also requires significant documentation to complete the procurement file.

In Genera's view, the Procurement Manual, combined with the contract review requirements imposed on Genera, generally over restrict Genera's ability to operate. Raising certain thresholds for the more complicated processes and approvals, and reducing repetitive documentation, could result in a more agile

and effective process without sacrificing the laudable goals of transparent, open and fair procurement.
Generation equipment is generally high dollar value, and the current requirements become particularly difficult in emergency or urgent but non-emergency situations, and/or where regardless of exceptions the limited vendor pool in Puerto Rico results in better suppliers and service providers hitting up against relatively low dollar value ceilings for stakeholder review and the longer procurement process.
Genera is currently reviewing the procurement manual to modify certain provisions and requirements that will allow Genera to procure goods or services more efficiently.

Q1 Updated Response:

Genera has proposed certain modifications to the Procurement Manual, which were sent to P3A for their review.

Q2 Updated Response:

Genera has proposed modifications to the Procurement Manual, which were submitted to P3A for review. P3A has received comments from COR3 and is currently conducting its final review.

Q3 Updated Response:

Genera is proposing to align procurement manual with the most recently updated CRF 200.

Q4 Response:

Genera has strengthened its procurement effectiveness by combining the approved Procurement Manual with strategic sourcing tools such as Master Services Agreements (MSAs) and Blanket Purchase Orders (BPOs). While the Procurement Manual—developed in coordination with P3A and COR3—ensures

compliance with federal reimbursement requirements and maintains transparency, fairness, and competitive practices, Genera recognizes the need for agility in its operations.

To address operational challenges, particularly in emergencies or zero-inventory scenarios, Genera has proactively implemented MSAs and BPOs. These contracting mechanisms allow for rapid task order issuance without repeating the full procurement process, as contractual terms, conditions, and funding are pre-established. This has significantly reduced lead times, enabling faster response to urgent needs while still maintaining compliance with procurement regulations.

Additionally, Genera is working to align its Procurement Manual with the most recent updates to CFR 200, incorporating feedback from P3A and COR3. These revisions aim to raise certain thresholds, streamline documentation requirements, and improve process efficiency—particularly for high-value generation equipment and situations where vendor options are limited in Puerto Rico.

Through these measures, Genera has enhanced its ability to balance compliance and transparency with operational speed and effectiveness, ensuring readiness and cost efficiency across its operations.

C12. Procurement of spare parts with long lead times

GPR–PREB–NEPRMI20210014–20240226–ATTA #C12(a)

a. Report on the status and accuracy of identifying long lead time spares.

Response:

See answer GPR–PREB–NEPRMI20210014–20240226–ATTA #C11(a).

Q1 Updated Response:

No updates.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C12(b)

a. Report on the status, details, and effectiveness of multi-faceted approach for:
   i. Long-term agreements
   ii. Make and hold
   iii. Blanket PO
   iv. Vendor-managed inventory
   v. Consignment stocking

Response:

i. Long-term agreements - Genera is working with certain OEMs to establish and renegotiate Long Term Service Agreements. A successful example is the contract established with Mitsubishi for unit 5&6 of San Juan. This contract allows for recurrent services already agreed and purchase of parts at a fixed agreed price.

   Genera is conducting market soundings for LTSA on other plants. Replicating this type of contract with other OEMs for other units will help Genera minimize requisition backlog, long lead time for parts and better pricing in other parts and components required for the operation and maintenance of the unit.

ii. Make and hold – Pre-payment for goods to be shipped later has not been an active strategy pursued to date by Genera. This generally poses increased risk to the buyer, and given budget constraints, questions on PREPA's legal ability to pre-pay for products / services not delivered and the variety of other strategies to be implemented, make and hold has not been the top priority. Peak-er and BESS RFPs may seek to implement this strategy to some extent for certain components, but details remain under negotiation.

iii. Blanket PO – Genera is implementing the Blanket PO or Master Service (or Supply) Agreement across the board. On the services side, Genera will be signing in the coming weeks double digit master service agreements for substations, power plant, forced outage and emergency maintenance. Genera is also implementing this type of contract with critical component vendors, OEMs and other suppliers to ensure more flexibility and quicker response times.

iv. Vendor-managed inventory – Genera is engaging vendors at all levels to build a strong relationship and identify vendors who can warehouse parts on island, whether in Genera facilities or in their own facilities. Genera will generally need to make a long-term commitment with the supplier for this to be worthwhile. Genera may put vendor-managed inventory to the test with the Demi Water Tank awarded to Veolia, who will have the ability to use Genera's warehouse to store spare parts, chemicals and other material needed to treat the water. Ownership of the material remains with the vendor until Genera has the need to use them. As PREPA emerges from bankruptcy and Genera proves a successful partner for vendors over a longer period operating on the island, this will become an easier strategy to implement with others.

v. Consignment stocking - Genera does not have consignment agreements for consumables or other parts.

Q1 Updated Response:

i. Make and Hold - Genera is still negotiating the terms of the Peakers and BESS projects, as well as other OEM part supply agreements, which may implement this initiative if vendors accept related terms.

ii - Blanket PO (Master Service Agreement) - Genera succesfully signed 6 master services agreements for emergency services, 4

master service agreements for forced outage services and in the coming weeks, Genera expects to sign 7 master services agreements for maintenance.

Q2 Updated Response:

iii - Blanket PO (Master Service Agreement) - Genera succesfully signed 6 master services agreements for emergency services, 6 master service agreements for forced outage services and 7 master services agreements for maintenance.

Q3 Updated Response:

We continue to work on MSSA project. Al
l maintenance processes are being handled through this tool to streamline and secure the required services for the upcoming fiscal year.

Q4 Updated Response:

No updates.

C13. Synchronization of spare parts inventory with legacy power plants' repair schedules

GPR–PREB–NEPRMI20210014–20240226–ATTA #C13(a)

a. Report on the status of the Unit Maintenance Plan for Boilers and Turbo Generators being coordinated with LUMA.

Response:

San Juan Unit #6: Change in the date of major repair from March 2024 to November 2024.

Reasons: Lack of generation to meet minimum system reserve requirements. Forced outage of Aguirre Unit 1, forced outage of Costa Sur Unit #6 and delay in repair Costa Sur Unit # 5. On August 8, 2023, the Palo Seco Unit #4 generator broke down and needs to be rewound. Estimated time May 2025.

San Juan Unit #7: Had scheduled maintenance but went on forced outage before the scheduled date due to turbine rotor failure. The turbine rotor was replaced with Unit #10 rotor. Major maintenance was rescheduled for March 2025.

San Juan Unit #9: Unit maintenance was rescheduled for November 2024 due to delays in the delivery of spare parts and approval of the project with federal funds.

Palo Seco Unit #3: Scheduled repair took longer than estimated from March 2024 to July 2024. Unit in service.

Palo Seco Unit #4: Catastrophic failure in generator in August 2023. Expected repair date in May 2025.

Costa Sur Unit #5: delays in scheduled repairs from October 2023 to February 2024. Damages in the control valve and in the normal and emergency transformer.
Costa Sur Unit#6: Emergency forced outage due to emergency transformer failure. Replace it with a new emergency transformer. Works lasted until May 2024.

Aguirre Unit #1: Damages in generator hydrogen seals. The repairs lasted from January to April 2024.

Aguirre Unit #2: repairs were rescheduled from November 2023 to November 2024. There is a lack of generation to meet LUMA's reserve requirements.

Q1 Updated Response:

No Changes.

Q2 Updated Response:

Key scheduled outages and delays during the second quarter include:

1. San Juan Unit 6 major outage delayed due to regulatory agencies' contract approval process.
2. San Juan Unit 5 had a scheduled outage for a borescope inspection during the second week of November, lasting one week.
3. San Juan Unit 7's maintenance extended from March 2025 to May 2025 due to procurement process issues.
4. San Juan Unit 9 taken out of service one week later than planned for environmental maintenance due to the borescope inspection of San Juan 5.
5. Costa Sur Unit 5 maintenance postponed from January 2025 to February 2025 due to delays at the Aguirre Steam Plant.

6. Aguirre Unit 1's scheduled outage for generator hydrogen leak repairs delayed from November 7 to November 27, 2025, due to the Puerto Rico election process.
7. Aguirre Unit 2 programmed outage delayed from December 1 to December 30, 2024, due to hydrogen leaks detected during final tests by General Electric.

Q3 Updated Response:

Key scheduled outages and delays during the third quarter include:

1. San Juan Unit 6 major outage in process. Unit expected to be online April 30, 2025, in single cycle (CT unit Only).
2. San Juan Unit 5 Planned Turbine inspection October 2025 for 4 weeks.
3. San Juan Unit 7's maintenance extended from March 2025 to August 2025 due to procurement process issues.
4. San Juan Unit 9 Mayor outage Planned from November 2025 to February 2026.
5. Costa Sur Unit 5 environmental maintenance beginning March 1 until May 1, 2025, to eliminate over 60 MW limitations.
6. Costa Sur Unit 6 environmental outage and replace air heater basket to remove limitations from November 2025 to December 2025.
7. Palo Seco 4 Forced Outage in process. Forecast: return unit July 2025.
8. Aguirre Unit 1's forced outage beginning February 14, 2025.
9. Cambalache Unit 2 and Unit 3 scheduled outage for Combustion inspection beginning mid may for 1 week and half.
10. Aguirre Combined Cycle Unit 1-4 procurement process to approved contract, beginning mayor outage June or July 2025.

Q4 Updated Response:

Key scheduled outages and delays during the fourth quarter include:

1. San Juan Unit 6 major outage completed on May 8, 2025. Unit is in service in simple cycle mode with a capacity of 160 MW.
2. San Juan Unit 5 Planned Turbine inspection is scheduled for October 2025, lasting approximately 4 weeks.
3. San Juan Unit 7's maintenance was extended from March 2025 to November 2025 due to additional findings on the low-pressure turbine rotor.
4. San Juan Unit 9 Mayor outage was rescheduled to December 2025 in agreement with Luma.
5. Costa Sur Unit 5 environmental maintenance was completed on May 1st as planned. The unit generation capacity is available for 405 MW in bunker C or Natural gas. The unit was limited to 175 MW before the planned outage. Further maintenance completion it was added 230 MW of capacity to the unit.
6. Costa Sur Unit 6 environmental outage and replacement of air heater basket to improve capacity and efficiency are planned for November 2025.
7. Palo Seco 4 Forced Outage repairs are still in process. Unit is expected to return to service in August 2025.
8. Aguirre Unit 1 had a forced outage on February 14, 2025.
9. Aguirre Combined Cycle Unit 1-4 hot gas path inspection started on July 22, 2025.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C13(a)(i)

i. Provide reasons for any maintenance delays and describe mitigating measures identified to reduce future and shorten existing delays.

Response:

Please see answers GPR–PREB–NEPRMI20210014–20240226 #3 & GPR–PREB–NEPRMI20210014 – 20240226 #5.

Q1 Updated Response:

No Changes.

Q2 Updated Response:

Please see answers GPR-PREB-NEPRMI20210014-20240226 #3 & GPR–PREB–NEPRMI20210014 – 20240226 #5.

Q3 Updated Response:

Please see answers GPR–PREB–NEPRMI20210014–20240226 #3 & GPR–PREB–NEPRMI20210014 – 20240226 #5.

Q4 Updated Response:

Please see answers GPR–PREB–NEPRMI20210014–20240226 #3 & GPR–PREB–NEPRMI20210014 – 20240226 #5.

GPR–PREB–NEPRMI20210014–20240226–ATTA #C13(b)

1. Report on accuracy of work packages including availability of parts, equipment, and design among the other designated components.

Response:

The warehouse has the capacity to transfer critical parts from other locations using the asset suites system, which also enables supervisors to track inventory in real-time and prepare requisitions for material replenishment. The Procurement Department utilizes a procurement manual to acquire materials, working directly with suppliers to ensure fair pricing and timely delivery. However, limited access and rights within the asset suites system hinder the ability to update the inventory system effectively, preventing Genera from fully utilizing the system's capabilities or customizing it to meet specific needs.

Q1 Updated Response:

Asset Suite 9 (EAM) can transfer critical parts from other locations, it also allows supervisors to track inventory in real-time and prepare requests for material replenishment.

Based on requests for replenishment of materials, the Procurement Department uses the procurement manual to procure materials, working directly with suppliers to ensure fair prices and timely deliveries.

However, limited access and rights within the Asset Suite inventory control system hinder the ability to update the inventory system effectively, preventing Genera from fully utilizing the system's capabilities or customizing it to meet specific needs.

Delays provoked by Luma's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have now extended the SSA to end by February 15, 2025.

Q2 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA.

Q3 Updated Response:

Delays caused by LUMA's changes and late delivery of project tasks related to core application separation of Asset Suite 9 have extended the SSA. (IT is working on glitches on system to customize to genera use.)

Q4 Response:

IT is currently working on reporting. At the moment, data is being monitored daily from the front end of Asset Suite.

C14. Verification of spare part quantities as compared with inventory list

GPR–PREB–NEPRMI20210014–20240226–ATTA #C14

Report on the status and accuracy of the extensive inventory audit at all facilities.

Response:

To achieve this goal, Genera's Warehouse Department will be reporting every month the activities of the operations in all warehouse facilities reflecting the inventory at the end of each month, all warehouse transactions during the period, the inventory movement in each warehouse, and all activities of proper storage, minimal handling, efficient management, inventory controls, and waste elimination, achieving low-cost on-time delivery.

In addition, Genera's Supply Team will act in a prospective and agile way to work out the complexity brought about by constant and unpredicted changes and demands of our suppliers and end users by aggressively applying to the Procurement Manual guides to comply with all the requirements established in the manual to assure an efficient replenishment of all the parts in the inventory.

Q1 Updated Response:

No updates.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Response:

Genera PR maintains a contract with DCMC to perform daily inventories across all four warehouses using DCMC's own inventory personnel. DCMC provides daily inventory reports and promptly notifies Genera's Chief Financial Officer of any discrepancies identified.

C 15. Incomplete inventory information

GPR–PREB–NEPRMI20210014–20240226–ATTA #C15

a. Report on the status of eliminating current and future instances of missing information for critical and major items for Unit Cost, Quantity in Stock, Required Quantities and Total Cost.

Response:

The Warehouse Department is currently working on updating item specifications in collaboration with their end users within the Asset Suite system. Updates are notified to LUMA's material management team via email, as this team holds control and licensing for Asset Suite. Additionally, the Operations team will be providing the warehouse with a critical parts list, including detailed descriptions, to ensure that all necessary updates are accurately reflected in the Asset Suite system.

Q1 Updated Response:

The Warehouse Department is currently working collaboratively with its end users on updating item specifications in the Asset Suite inventory control system.
In the case of items already coded in the Warehouses, a work order is generated to LUMA's materials management team, by email, notifying the updates to be made, this is due to LUMA having control and licenses of the Asset Suite.

In the case of items not coded in the Warehouses, a work order is generated to LUMA's materials management team, by email, requesting the creation of the item by submitting the form "REQUEST FOR NEW ASSET SUITE CATALOG WAREHOUSES PLANT-GeneraPR" along with the necessary technical documents, this because LUMA has the control and licenses of the Asset Suite.

In both cases, the provision of critical parts information provided by the operations team to the warehouse will result in detailed descriptions of materials, updated unit cost and the amount needed to avoid system interruptions, as well as streamlining the purchasing process by having the required quantities and total cost. This process will be streamlined when GeneraPR finally has control and licensing of the Asset Suite.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

The IT Department is currently addressing system glitches to customize the Asset Suite 9 platform for Genera's operational use. Once the system is fully tailored to Genera's operational needs, warehouse supervisors will begin preparing a new catalog of items in coordination with operations personnel.

C16. Critical items out of stock

GPR–PREB–NEPRMI20210014–20240226–ATTA #C16

Provide status on:

a. Eliminating instances of critical items out of stock
b. The actual impact of critical items out of stock on the repair schedule and stabilization of units.
c. Evaluation of replacement equipment and alternative parts supplies.
d. Planned outage scopes of work, resource mapping, and risks that could affect the reliable operation of the fleet power plants.

Response:

- The warehouse, with IT support, will update all catalog list descriptions.
- All critical spares will have a minimum balance of 1 each in stock; if the item has an extended lead time, the minimum should be 2.
- The maintenance department will establish a plan with the warehouse department to forecast any future outages or major repairs. Continuous collaboration is the goal in avoiding shortage of the critical parts.

Lead times-Unit schedules are affected by delays in delivering of spares parts and equipment which compromise our ability to provide reliable generation.

Q1 Updated Response:

a. The Warehouse established new parameters for the elimination of cases of critical out-of-stock items in conjunction with the operations team using the updated information on critical parts:
   1. Detailed material descriptions
   2. Updated Unit Cost
   3. Amount needed to avoid system outages
      - Updating the highs and lows

- Updated the reorder system to prevent lines from reaching zero.

4. Streamlining the communication process with the purchasing department to promptly attend to the process of acquiring the required quantities.

b. The new parameters established by the Warehouse directly impact the available balances and avoid the lack of the critical items established in the repair and stabilization program of the units.

c. Warehouse generated requests for replenishment of materials set forth the parameters and guidelines for the Procurement Department, using the procurement manual, to evaluate the potential procurement of replacement equipment and supplies of alternative parts by working directly with suppliers to ensure fair pricing and timely deliveries.

d. The new parameters set by the Warehouse directly impact the scopes of work of planned outages, resource mapping, and risks that could affect the reliable operation of the fleet's power plants.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

Warehouse generated requests for replenishment of materials and critical parts components are being prepare with operations personnel using asset suites master catalog document.

C 17. Genera's plan in the event of generating plant critical turbine failure

GPR–PREB–NEPRMI20210014–20240226–ATTA #C17

Report on the readiness of Genera according to its plan in the event of critical turbine failure at any of the fleet power plants, including how any shortage or unavailability of critical parts that require long lead times are addressed.

Response:

Over the past year, Genera has made progress in total generation capacity. This is the result of strategic projects implementing short-term repairs and maintenance work. Some examples include Aguirre 1&2 2, Palo Seco 3&4, Cambalache, the peakers fleet, among others. Genera is diligently working on having available MW to supply the power demand and support the stabilization of the power grid. These repairs have increased the availability of MW from 45% to approximately 60% in one year.

An increase in planned maintenance is key to keeping units working correctly, which helps reduce potential failures of critical parts. Having additional MW available helps Genera support the system in case of failure. If a unit is forced out of service, the generation fleet may still have the capacity to sustain the grid, preventing load-shedding events.
The Genera team is also assessing the conditions of the critical parts in the units and engaged in the procurement of critical components that, once installed, will improve the reliability of the fleet. These assessments allow for better planning and use of the unit. If Genera does not have sufficient stock in inventory, Genera is sourcing the parts from different suppliers, including refurbished if necessary. Additionally, Genera is reaching out to other utilities or businesses that may use the same system or have surplus in their warehouse that is still operational and in working conditions that can be purchased as spare part in case of an emergency or sudden failure.

Q1 Updated Response:

No updates.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

C18. Benchmarks for Critical Spare Parts

GPR–PREB–NEPRMI20210014–20240226–ATTA #C18(a)

a. Report on Genera's success in developing and meeting benchmarks for the availability of critical spare parts.

Response:

Genera has published RFPs for over 95% of the identified critical spare parts or components, 10% of which have already been awarded and are awaiting stakeholders' approval. Genera keeps working on publishing the remaining RFPs that require analysis and development of specifications and designs, among others, while facing the challenge of governmental approvals for the contracts already awarded. Additionally, we face the challenge of the market capacity to provide these critical spare parts or components. Estimated delivery times for these parts are expected to be between 12 to 24 months (about 2 years) after contract signing.

Q1 Updated Response:

Genera has selected vendors for over 80% of the critical spare parts. Some critical spare part RFPs did not receive a response. For those cases, Genera is reviewing the technical specifications published and contacting vendors to understand the constraints.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.

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b. Report on effectiveness and accuracy of Genera's process for determining whether inventory of critical and major parts is low and making sure adequate quantities are in place.

Response:

- Asset Suite was updated in the Master Category Module.
- All materials are marked with metal markers and placed in their bin locations.
- All spare parts get inventory count every time they are dispatched to their end user.

Q1 Updated Response:

All stock items that are used by end users will automatically be uploaded to the replenishment window. All warehouse supervisors will verify on the suggested reorder tab and prepare requisitions to replace items that are below max level. Once approved requisition will be sent to procurement to begin the process for bids and find the supplier to replace material for future use.

Q2 Updated Response:

No updates.

Q3 Updated Response:

No updates.

Q4 Updated Response:

No updates.