

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

NEPR

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IN RE:

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY'S 10-
YEAR INFRASTRUCTURE PLAN –
DECEMBER 2020

CASE NO.: NEPR-MI-2021-0002

SUBJECT: Motion to Submit Monthly BESS
Progress Report in Compliance with Resolutions
and Orders Dated February 1, 2024, and April
23, 2024.

**MOTION TO SUBMIT MONTHLY BESS PROGRESS REPORT IN
COMPLIANCE WITH RESOLUTIONS AND ORDERS
DATED FEBRUARY 1, 2024, AND APRIL 23, 2024**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On February 1, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order titled *Determination on GENERA's November 21 Motion Submitting Response in Compliance with the Resolution and Order Dated November 8, 2023, and Requesting a Time Extension to Provide the Detailed Scope of Work per Site* (“February 1st Order”). In the February 1st Order, the Energy Bureau approved the projects included in Attachment A therein and noted that Genera is required to present these approved projects to the Federal Emergency Management Agency (“FEMA”) and the Puerto Rico

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services (as defined in the LGA OMA) provided by Genera under the LGA OMA.

Central Office for Recovery, Reconstruction and Resiliency (“COR3”) to finalize their approval process.

2. Additionally, in the February 1st Order, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA², as well as updates on the development status of the detailed Scope of Works (“SOW”) and the Battery Energy Storage System (“BESS”) Request for Proposals (“RFP”) (“Monthly Progress Report for the BESS Project”).

3. On April 23, 2024, the Energy Bureau issued a Resolution and Order reiterating to Genera the February 1st Order regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the report any updated information concerning the locations and MW quantities comprising the total of 430 MW of BESS projects across the full set of nine (9) project locations originally included in the October 27th Motion.

4. In compliance with the February 1st Order and the April 23rd Resolution, Genera respectfully submits to the Energy Bureau its Monthly Progress Report for the BESS Project for the month of August 2025 as *Exhibit A* to this motion.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera’s Monthly Progress Report for the BESS Project for the month of August 2025, submitted as Exhibit A to this Motion; and **deem** Genera to be in partial compliance with the February 1st Order and April 23rd Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of September 2025.

(Signatures appear on the following page.)

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

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CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to arivera@gmlex.net; mvalle@gmlex.net; margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com; Felix.Hernandez@prepa.pr.gov.

In San Juan, Puerto Rico, this 9th day of September 2025.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

Exhibit A
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR
INFRASTRUCTURE PLAN

BESS Monthly Report

Cambalache RFP Project Milestone – Important Dates:

RFP 4826 for the BESS installation works was published in December 2024. The following milestones have been achieved as of this report:

- The contract for BESS installation was approved by FOMB on August 1, 2025, and by P3A on August 4, 2025.
- Weekly construction coordination meetings with RG Engineering (RGE) personnel are ongoing.
- The Interconnection Facility Study report remains in progress and is expected to be delivered to Genera by October 20, 2025.
- The Notice to Proceed was issued to RGE on August 26, 2025.
- Integra's structural study of the bridge leading to the plant entrance is ongoing. The report is expected to be delivered by September 12, 2025.
- Genera is collaborating with LT Automation, a PREPA contractor, responsible for installing the IT/OT communications room and monopole at the Cambalache site.
- Weekly project coordination meetings are being held to monitor progress and address any issues.
- EHHS submitted the Lead and Asbestos Report to Genera on August 29, 2025. The document has been uploaded to Procore.
- The cost estimate for the transformer studies has been submitted and remains under review. Genera is currently evaluating the \$750,000 budget required for all GSU-related studies, repairs, and relocations. Confirmation of funding and execution timing is pending.

Vega Baja Plant

- The contract for equipment installation was approved by P3A on August 7, 2025, and by FOMB on August 25, 2025. Contract execution is pending final contractor signature.
- The PUI permit (Permiso Único Incidental) was officially closed following the completion of the decommissioning project. There will be another PUI Permit submission for the installation of the BESS project.
- Internal review of contractor quotes for GSU relocation is ongoing.
- Weekly construction coordination meetings with the ARG team continue.
- The Construction Management team is coordinating with all parties involved to prepare for mobilization.
- Sargent & Lundy will submit preliminary design drawings reflecting Tesla's comments, including the addition of an emergency exit.
- Issuance of the Notice to Proceed remains scheduled for September 2025.

Palo Seco plant

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

Costa Sur

- Civil and Structural works contract originally scheduled for submission to FOMB/P3A approval by August was moved to September 12, 2025.
- Weekly Construction Meetings with RGE team are ongoing.
- LT Automation is determining the location of the IT/OT Communication Rooms and Monopole at Costa Sur.
- Issuance of a Notice to Proceed is schedule for September 2025.

Aguirre

- Civil and Structural works contract submission for FOMB and P3A approval was delayed and now the set date is on September 12, 2025.
- Weekly construction meetings with RGE team are ongoing.
- Issuance of a Notice to Proceed is set for October 2025.

Yabucoa

- Civil and Structural works contract will be submitted for FOMB and P3A approval on September 12, 2025.
- RFC (Request for Clarification) meetings are held with the RGE.
- Weekly construction meetings with RGE are ongoing.
- Issuance of a Notice to Proceed is scheduled for October 2025.

LUMA Interconnection Studies:

- The **System Impact Studies** for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa were received from LUMA on August 27, 2025, and are currently under review by Sargent & Lundy and Tesla.
- The **System Facility Studies** for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa are expected to be completed and delivered by October 20, 2025, as preliminarily indicated by LUMA. Follow-up is ongoing, as the timely receipt of these studies is critical for advancing the RFP process.

Interconnection

- Genera and LUMA executed a Memorandum of Understanding outlining the process for handling interconnection payments.
- The Roles and Responsibilities document remains pending LUMA's response to Genera's comments.
- Weekly coordination meetings with LUMA continue to be held to accelerate the process.

Permits

- The PUI Permit applications for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa are currently in process and will be submitted soon.
- **The NPDES (National Pollutant Discharge Elimination System** – Construction Stormwater) permit for Cambalache is currently being prepared by RGE, including the required SWPPP documentation. Submission must occur at least two weeks prior to the start of construction activities.
- The Fire Department Endorsement for all sites is in process. Genera is currently requesting a quote for the preparation of the Hazard Mitigation Plan and the Emergency Response Plan.

Procurement

- Weekly meetings with Tesla's Project Management Team are ongoing.
- The Long Terms Service Agreement (LTSA) contract continues under evaluation by Genera.
- Discussions are ongoing with LUMA, Tesla, and Genera regarding the grid forming approach to meet the Minimum Technical Requirement (MTR) approval.
- Tesla Transportation Plan for Cambalache is under review by Genera.
- The third payment milestone for Tesla was issued during August 2025,, with a total disbursement of \$136,703,510.41.