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

IN RE:	**CASE NO. NEPR-MI-2021-0002**
IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN-DECEMBER 2020	**SUBJECT: Motion Submitting Two FEMA Approvals of Projects, Request for Confidential Treatment, and Supporting Memorandum of Law**

MOTION SUBMITTING TWO FEMA APPROVALS OF PROJECTS, REQUEST FOR CONFIDENTIAL TREATMENT AND SUPPORTING MEMORANDUM OF LAW

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and **LUMA Energy ServCo, LLC**, (jointly referred to as "LUMA"), through the undersigned legal counsel and, respectfully submits the following:

I. Submittal of Two FEMA Approvals and Request for Confidentiality

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

2. On August 30, 2021, LUMA filed a *Motion Requesting Clarification of a Portion of the Energy Bureau's Resolution and Order Entered on August 20, 2021, and Submitting Updated List of Transmission and Distribution Projects and Twenty-Nine Scopes of Work* ("August 30th Motion"). In the August 30th Motion, LUMA submitted twenty-nine (29) SOWs for T&D Projects for the Energy Bureau's review and approval prior to submitting them to COR3 and FEMA. Among the twenty-nine SOWs, LUMA submitted the "Distribution Pole and Conductor Replacement" SOW, encompassing pole and conductor replacement projects throughout Puerto Rico.

3. On September 22, 2021, the Energy Bureau issued a Resolution and Order that determined that most of the SOWs for T&D projects submitted by LUMA in the August 30th Motion were necessary to improve the system's reliability ("September 22nd Order"). Therefore, it approved most of the projects presented in the August 30th Motion, including the "Distribution Pole and Conductor Replacement" SOW. The Energy Bureau also ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project within ten (10) days of receiving such approval.

4. Thereafter, on July 29, 2022, LUMA filed a *Motion Submitting Four Scopes of Work and Updated List of Projects and Request for Confidentiality and Supporting Memorandum* ("July 29th Motion") whereby it submitted four (4) SOWs for the Energy Bureau's review and approval prior to submitting them to COR3 and FEMA ("July 29th Motion"). The SOWs submitted by LUMA included the "Transmission and Distribution Automation Program Installation of Intelligent Reclosers, Single Phase Reclosers and Fault Current Indicators" T&D Project.

5. On August 25, 2022, the Energy Bureau issued a Resolution and Order that determined that the SOWs for T&D projects submitted by LUMA in the July 29th Motion were

necessary to improve the system's reliability ("August 25th Order"). Therefore, it approved all of the projects presented in the July 29th Motion, including the "Transmission and Distribution Automation Program Installation of Intelligent Reclosers, Single Phase Reclosers and Fault Current Indicators" T&D Project. The Energy Bureau also ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project, within ten (10) days of receipt of such approval.

6. On November 7, 2023, LUMA filed the *Motion Submitting One Scope of Work, Request for Confidentiality and Supporting Memorandum of Law*, whereby LUMA submitted the "Transmission and Distribution Automation Program Installation of Three Phase Reclosers, Single Phase Reclosers and Fault Circuit Indicators and Feeder Headend Protection Devices" SOW for the Energy Bureau's approval ("November 7th Motion").

7. On November 27, 2023, the Energy Bureau issued a Resolution and Order whereby it approved the "Transmission and Distribution Automation Program Installation of Three Phase Reclosers, Single Phase Reclosers and Fault Circuit Indicators and Feeder Headend Protection Devices" SOW and ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project within ten (10) days of receiving such approval ("November 27th Order").

8. As shown in Exhibit 1 of the Motion filed on January 24, 2022, *Motion Submitting Updated List of Transmission and Distribution Projects and Three Scopes of Work*, and most recently in Exhibit 5 of the Motion filed on July 31, 2024, *Motion Submitting Three Amended Scopes of Work, and One Scope of Work, an Updated Project List, and Request for Confidentiality and Supporting Memorandum of Law*, the "Distribution Pole and Conductor Replacement" SOW

is divided into individual projects per region, which includes the "[Pole and Conductor Repair – San Juan Group 3 - Phase 2] (Distribution)" T&D Project.

9. Similarly, the "Transmission and Distribution Automation Program Installation of Intelligent Reclosers, Single Phase Reclosers and Fault Current Indicators" and "Transmission and Distribution Automation Program Installation of Three Phase Reclosers, Single Phase Reclosers and Fault Circuit Indicators and Feeder Headend Protection Devices" SOWs were divided into separate groups, which include the "FAASt [Automation Program Group 26] (TL/Distribution)," T&D Projects.

10. In compliance with the September 22nd, August 25th, and November 27th Orders, LUMA hereby submits copies of the following approvals by FEMA issued on September 3, 2025: "FAASt, [Automation Program Group 26] (TL/Distribution)" and "[Pole and Conductor Repair – San Juan Group 3 - Phase 2] (Distribution)," T&D Projects. *See* **Exhibit 1**[1] to this Motion. The document contains FEMA's approvals and includes the costs obligated for each Project.

11. LUMA is submitting herein a redacted public version of the FEMA approvals (**Exhibit 1**) protecting confidential information associated with Critical Energy Infrastructure Information ("CEII"). As explained in this Motion, portions of the FEMA approvals of the T&D Projects are protected from disclosure as CEII, *see, e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. § 388.113 (2020), and pursuant to the Energy Bureau's Policy on Management of Confidential Information. *See* Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.

II. Memorandum of Law in Support of Request for Confidentiality

A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau

[1] Please note that **Exhibit 1** has digitalization and table format issues, which are found on the documents as issued by FEMA.

12. The bedrock provision on the management of confidential information filed before this Energy Bureau, is Section 6.15 of Act 57-2014, known as the "Puerto Rico Energy Transformation and Relief Act." It provides, in pertinent part, that: "[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such […]" 22 LPRA § 1054n. If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, "it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* § 1054n(a).

13. Access to confidential information shall be provided "only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement." *Id.* § 1054n(b). Finally, Act 57-2014 provides that this Energy Bureau "shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review." *Id.* § 1054n(c).

14. Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico.

15. Moreover, the Energy Bureau's Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be

afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ⁋ 3. The party that seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* at ⁋ 6.

16. The Energy Bureau's Policy on Management of Confidential Information states the following with regard to access to validated CEII:

> Critical Energy Infrastructure Information ("CEII")
>
> The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties' authorized representatives only after they have executed and delivered the Nondisclosure Agreement.
>
> Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

Id. at § D (on Access to Validated Confidential Information).

17. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that "a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant

to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed according to […] Article 6.15 of Act No. 57-2015, as amended." *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms,* § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

B. Request for Confidentiality

18. The FEMA approvals included in **Exhibit 1** contain portions of CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the FEMA approvals with CEII warrant confidential treatment to protect critical infrastructure from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII under seal of confidentiality.[2] In at least two Data Security and Physical Security proceedings,[3] this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure.

[2] *See e.g., In re Review of LUMA's System Operation Principles,* NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority's System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA's Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan,* NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrid Transmission and Distribution Investments*, NEPR-MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII. However, *see* Resolution and Order of February 12, 2021, reversing in part, grant of confidential designation).

[3] *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan,* NEPR-MI-2020-0018.

19. Additionally, this Energy Bureau has granted requests by LUMA to protect CEII in connection with LUMA's System Operation Principles. *See* Resolution and Order of May 3, 2021, table 2 on page 4, Case No. NEPR-MI-2021-0001 (granting protection to CEII included in LUMA's Responses to Requests for Information). Similarly, in the proceedings on LUMA's proposed Initial Budgets and System Remediation Plan, this Energy Bureau granted confidential designation to several portions of LUMA's Initial Budgets and Responses to Requests for Information. *See* Resolution and Order of April 22, 2021, on Initial Budgets, Table 2 on pages 3-4, and Resolution and Order of April 22, 2021, on Responses to Requests for Information, Table 2 on pages 8-10, Case No. NEPR-MI-2021-0004; Resolution and Order of April 23, 2021, on Confidential Designation of Portions of LUMA's System Remediation Plan, table 2 on page 5, and Resolution and Order of May 6, 2021, on Confidential Designation of Portions of LUMA's Responses to Requests for Information on System Remediation Plan, table 2 at pages 7-9, Case No. NEPR-MI-2020-0019.

20. Similarly, the Energy Bureau has granted LUMA's requests for confidential treatment of portions of the FEMA approvals submitted for approval in the present case. Notably, the Energy Bureau has granted LUMA's request for confidential treatment of portions of FEMA Approvals of Projects submitted for consideration and authorization. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

21. As mentioned above, the Energy Bureau's Policy on Management of Confidential Information provides for the management of CEII. It directs that the parties' authorized representatives access information validated as CEII only after executing and delivering a Non-Disclosure Agreement.

22. CEII or critical infrastructure information is generally exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

> Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:
> (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
> (ii) Could be useful to a person in planning an attack on critical infrastructure;
> (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
> (iv) Does not simply give the general location of the critical infrastructure.

Id.

23. Additionally, "[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, "[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters." *Id.*

24. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information ("CII").[4]

[4] Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

(A) shall be exempt from disclosure under the Freedom of Information Act;
(B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision-making official;
(C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
(D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
(i) in furtherance of an investigation or the prosecution of a criminal act; or

CII is defined as "information not customarily in the public domain and related to the security of critical infrastructure or protected systems [...]" 6 U.S.C. § 671 (3).[5]

25. Portions of the FEMA approvals in **Exhibit 1** qualify as CEII because each of these documents contains the express coordinates and physical addresses to power transmission and distribution facilities (18 C.F.R. § 388.113(iv)), and these specific coordinates and addresses could potentially be helpful to a person planning an attack on the energy facilities listed as part of this FEMA approval. The information identified as confidential in this paragraph is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that, on

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(ii) when disclosure of the information would be--

(I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or

(II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office

(E) shall not, be provided to a State or local government or government agency; of information or records;

(i) be made available pursuant to any State or local law requiring disclosure of information or records;

(ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or

(iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.

(F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

[5] CII includes the following types of information:

(A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;

(B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or

(C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of the FEMA approvals with CEII in **Exhibit 1** from disclosure, given the nature and scope of the details included in those portions of the Exhibit.

26. Based on the above, LUMA respectfully submits that portions of the FEMA approvals should be designated as CEII. This designation is a reasonable and necessary measure to protect the specific location of the energy facilities listed or discussed in the FEMA approvals in **Exhibit 1**. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that these materials constitute CEII that should be maintained confidentially to safeguard their integrity and protect them from external threats.

C. Identification of Confidential Information

27. In compliance with the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009) below, find a table summarizing the portions of the FEMA approvals for which we present this request for confidential treatment.

Document	**Name**	**Pages in which Confidential Information is Found, if applicable**	**Summary of Legal Basis for Confidentiality Protection, if applicable**	**Date Filed**
Exhibit 1	FAASt [Automation Program Group 26] (TL / Distribution)	Pages 1, 3-10	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	September 12, 2025

Document	Name	Pages in which Confidential Information is Found, if applicable	Summary of Legal Basis for Confidentiality Protection, if applicable	Date Filed
Exhibit 1	FAASt [Pole and Conductor Repair – San Juan Group 3 - Phase 2] (Distribution)	Pages 1-2, 4, 9	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	September 12, 2025

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the copies of the FEMA approvals attached herein as **Exhibit 1**; and **grant** the request for confidential treatment of **Exhibit 1**.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this motion to counsel for PREPA Alexis Rivera, arivera@gmlex.net, and to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfr@sbgblaw.com, and Jennise M. Alvarez González, jennalvarez@sbglaw.com.

In San Juan, Puerto Rico, on this 12th day of September 2025.

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Exhibit 1 (public, redacted)

Two (2) FEMA Approvals

Department of Homeland Security
Federal Emergency Management Agency

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General Info

Project #	757692 **P/W #** 108035	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Automation Program Group 26] (TL / Distribution)	**Event**	4339DR-PR (4339DR)
Project Size	Large	**Declaration Date**	9/20/2017
Activity Completion Date	9/20/2027	**Incident Start Date**	9/17/2017
		Incident End Date	11/15/2017
Process Step	Obligated		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #1399045; FAASt [Automation Program Group 26: Arecibo Feeder: 9004-08] (Distribution)

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Automation Program Group 26
- **Facility Description:** Arecibo Feeder: 9004-08
- **Approx. Year Built:** 1980
- **Start GPS Latitude/Longitude:** [redacted]
- **End GPS Latitude/Longitude:** [redacted]

Final Scope

1399045 **FAASt [Automation Program Group 26: Arecibo Feeder: 9004-08] (Distribution)**

Introduction

This document is to submit for approval a Detailed Scope of Work ("SOW") to COR3 and FEMA for the Transmission and Distribution Automation Program under DR-4339-PR Public Assistance. The document provides a description of the project, including scope, schedule, and cost estimates. LUMA Energy is seeking approval from COR3 and FEMA for project funding to repair, restore, or replace the eligible facilities.

LUMA submits this detailed SOW according to the Transmission and Distribution Operations & MaintenanceAgreement between the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and LUMA Energy, and following the Consent to Federal Funding Letter issued by PREPA and P3A, which collectively provides the necessary consent for LUMA Energy, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the Transmission and Distribution System submitted to FEMA.

Background

In order to rebuild the entire electrical grid, the Transmission & Distribution Automation Program ("Program") installsadvanced technology equipment (*i.e.*, reclosers and communicating fault current indicators) to reduce service interruptions to the electrical grid caused by disaster-related damage. The multiple projects within this Program are designed to fortify the electrical system's resilience, safeguard its infrastructure, and enhance service reliability. The strategy is to deploy full automation equipment to the

transmission and distribution systems. While the individual projects are interconnected and enhance each other, each can also be implemented independent of each other, and each confers benefits independently. The Program includes multiple projects being implemented across the island on both systems. Automation is one of several initiatives to complete the final restoration of the transmission and distribution systems. The 3.5 million residents throughout Puerto Rico are dependent upon the successful completion of the Program and its ability to sustain the power grid in future disasters.

Project 757692 is one of the Program's distribution-level projects. It installs hardened poles, advanced technology equipment (specifically three-phase reclosers and communicating fault current indicators), and online protection devices to reduce service interruptions to the distribution grid that could be caused by disaster-related damage. Implementing the reclosers, their communication kits, and the communicating fault current indicators is critical for the Energy Management System ("EMS") and related components to function at their full capabilities and mitigate loss of service and potential damages for upcoming occurrences. This project is necessary for the EMS to maintain the continuity of the distribution power grid on Feeder 9004-08.

Key components of this project are (1) pole replacement, (2) the three-phase reclosers, single- phase reclosers, and (3) the communicating fault current indicators. Each of these components and their benefit to the grid are described further below:

(1) Pole Replacement to Accommodate the Installation of Reclosers

The addition of three-phase reclosers imposes additional load on poles due to the weight and operational components of the devices and also increases the wind area exposed to extreme weather conditions, such as hurricanes, thereby augmenting the structural load these poles must withstand. Pole loading analysis will be used to determine whether a recloser pole and/or pole adjacent to the recloser will maintain structural integrity. If not, higher-class (strength) structures/poles made of steel or concrete will be installed to comply with codes and standards. This includes adjacent poles (*i.e.*, poles that are on either side of the recloser pole supporting the overhead line conductors). Any new structure and foundation will be designed to LUMA design and industry standards so they can support the pole, recloser, and its attachments.

In addition, LUMA is using a per-location approach to pole replacement because of the intricate dynamics of deploying three-phase reclosers. Furthermore, the integration of more connections, switches, and related infrastructure often necessitates taller poles to meet phase spacing and circuit-to-circuit spacing requirements. LUMA will replace all wood poles where three-phase reclosers are being installed, irrespective of their current condition, to address the compounded structural demands and spacing prerequisites, ensuring the resilience and reliability of the electrical grid infrastructure.

(2) Feeder Reclosers

Reclosers are sophisticated devices that remotely detect faults within distribution lines, enable the isolation of circuit breakers linked to those faults—whether due to independent failures or breakdowns—and facilitate the swift restoration of power, often within milliseconds. This project will install three-phase and single-phase reclosers.

Three-Phase Recloser: A three-phase recloser is a protection device that is used on three-phase distribution feeders with high fault currents at the location. It is a single device with three switches that can open to interrupt fault currents and automatically reclose to restore power. Three-phase reclosers are communication-ready to enable remote control and visualization. The recloser's wireless communication capability will provide connectivity to LUMA's EMS so the system operator knows their status and can remotely control them. Deployment of the wireless communication devices includes configuration, testing, and commissioning of the wireless communication device, all networking devices, data acquisition, and control systems that form the connectivity path of the recloser to the EMS.

Implementation of three-phase reclosers will preserve the continuity of electric services by pre- empting or minimizing disruptions. The three-phase reclosers can be triggered remotely and provide data back to the operations center, enabling LUMA to prioritize restoration activities, reduce customer outage time, and minimize the potential for cascading infrastructure damage. Installation of the three-phase reclosers and associated hardware is critical for the EMS and associatedcomponents to function with full capabilities and to prevent loss of service and potential damage from future disasters. In this project we are installing five three-phase reclosers.

Single-Phase Reclosers: A single-phase recloser is a single protection device with one switch that can open to interrupt fault currents and automatically reclose to restore power. A single-phase recloser performs the same functions as a three-phase recloser, but it does not have the ability to communicate with the EMS. This project will install single-phase reclosers on single-phase or two- phase distribution feeder and distribution lines branching from the feeder. Single-phase reclosers will also be used on feeders with three-phases if fault currents are low at the location. In this project we are installing a total of 20 single-phase reclosers.

(3) Communicating Fault Current Indicators

Install communicating fault current indicators ("cFCI") at strategic locations to improve the outage management, restoration, and

recovery process, specifically by decreasing the time required to detect and locate faults. cFCI operate independent of the feeder reclosers. cFCI help identify permanentand incipient faults in the distribution system and collect voltage and current data which can be used to detect system imbalance, prevent future issues due to harmonics and help in building a predictive failure model.

Data sent to the EMS aides the grid operator in making decisions on operations, management and restoration. The cFCI can be programmed to send automatic notification/alarms based on user set parameters. This allows for quick dispatch of field crews to specific sections of the feeders and reduces the total restoration time during an outage event. Installation of the three-phase reclosers and the communicating fault current indicators (communications ready) is critical for the EMS to efficiently mitigate the loss of service and potential damages in future disasters.

This project's scope does not contain fiber optics or communication capability that is included in other projects. This project is distinguishable from projects that include fiber optics as these feeders will be using cellular technology for communications with the operations center. LUMA has developed this scope for reclosers and their associated hardware only. The lack of fiber optics as a method of transmitting information in this scope of work does not prevent or limit the monitoring capabilities of the reclosers and cFCIs or the automation capabilities of the reclosers on this feeder, nor does it prohibit the incorporation of fiber optics at a later date.

Facilities Description

The facilities listed below are part of PREPA's electric distribution system. All feeders originate from a substation (GPS Start) and serve customers along the route to various locations (GPS End). The coordinates shown below represent the mainline backbone of the feeder at issue in this project.

To avoid duplication of work across projects, LUMA reviewed the FIDs identified for work across distribution programs.The analysis did not identify any poles on this feeder, where LUMA is installing Distribution Automation ("DA") devices, that require disaster-related replacement. Accordingly, LUMA has not initiated any rebuild projects for this feeder under the Distribution Rebuild Program (also referred to as the "D-Line Program"). LUMA also confirmed that none of the poles on this feeder, which will be replaced under the Pole and Conductor Repair Program (also referred to as the "D-Pole Program"), will be replaced again under the DA Program. Because the poles in the DA program are not identified for replacement in either the D-Line or D-Pole Programs and the only cause for their replacement is the proper execution of mitigation measures , the pole replacement is included in the 406 Hazard Mitigation scope of work of this project. This allocation is consistent with the illustrated scenarios provided in the DA Program position paper and LUMA's Resilience Plan.

To further address any concerns regarding the duplication of work across other proposed or planned Hurricane Maria distribution projects, LUMA provides Appendix D which contains a list of all FIDs on the feeder upon which FEMA-eligible work will be performed and the associated proposed scope of work under each distribution program. Please refer to the ***APPENDIX D - LUMA Active Projects*** to show no duplication of scope elements.

Facilities List

Name	Feeder Number	GPS Start	GPS End
Arecibo	9004-08	[redacted]	[redacted]

Note: Please refer to **APPENDIX *C — Project Considerations*** for a list of all GPS locations that this project will impact.

Proposed 428 Public Assistance Scope of Work

For more detailed information about the scope of work please refer to the ***APPENDIX B- LUMA Project Cost Estimate*.**

Feeder 9004-08

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
7947904	[redacted]	(65' CONCRETE POLE) (38KV STD VERT TAN) (OPS- CP-C9) (K-5) (STL-10) (E-1-2-3) (F-1-3)	(70- S8 12-SIDED GALVANIZED STEEL POLE) (38KV STD VERT DDE) (OPS-CP-C9) (K-5) (REC-2- 1) (STL-10)	• Remove and dispose of 65' concrete • Replace with 70' S8 12- Sided Gal steel pole. • Remove, dispose and replace 38kv framing. • Remove, dispose and replace primar framing. • Remove, dispose and replace secon framing. • Remove and dispose of the dow ngu • Remove, dispose and replace ancho • Remove, dispose and replace street • Install 1 kva transformer (7.62kv/120 source side. • Install (1) three-phase

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
				Recloser 9004-08A in radial circuit. • Install and Commission Three-Phase communication kit for three-phase reclo
NEW POLE	[redacted]	N/A	(70' S8 12-SIDED GALVANIZED STEEL POLE) (38KV STD VERT DDE) (OPS-CP-C9) (S-1) (K-5) (REC-2-1)	• Install new 70' S8 12- Sided galv steel pole. • Install 38kv framing. • Install primary framings. • Install secondary framing. • Install secondary triplex conduct recloser from load side. • Install 1 kva transformer (7.62kv feed recloser from source side. • Install (1) Three-Phase Recloser 900 in loop restoration circuit. • Install and Commission Three-Phase communication kit for three-phase recloser

5329164	[redacted]	N/A	(K-5) (3/0 TPX (QTY= 175 FT))	• Install load side secondary framing c three phase recloser 9004- 08B.
29171836	[redacted]	(70' STEEL POLE) (38KV STD VERT TAN) (CP- C1)	(70' S8 12-SIDED GALVANIZED STEEL POLE) (38KV STD VERT DDE) (OPS-CP-C9) (REC-2-1)	• Remove and dispose of 70' steel pol • Replace with a 70' S8 12- Sided Galv Steel pole. • Remove, dispose and replace 3 framing. • Remove, dispose and replace primar framing. • Install 1 kva transformer (7.62kv/120 source side. • Install (1) Three-Phase Recloser 08C in radial circuit. • Install and Commission Three-Ph radio communication kit for three-phase recloser

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
26864069	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm. • Remove and dispose (3) fuses. • Close jumpers.
NEW POLE	[redacted]	N/A	(50' S8 12-SIDED GALVANIZED STEEL POLE) (S- 6) (REC-2) (K-6)	• Install new 50' S8 12- Sided Galvani Steel pole. • Install primary framing. • Install secondary framing. • Install (1) T hree-phase Recloser 90 in Radial circuit. • Install and Commission Three-Phase communication kit for three-phase recloser
6318564	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm. • Remove and dispose (3) fuses, • Close jumpers.
6320313	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm. • Remove and dispose (3) fuses. • Close jumpers.

1000630611	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a cross • Remove and dispose (3) fuses.
10001128	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a cross • Remove and dispose or a (3) fuses. • Close jumpers.
6320335	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm • Remove and dispose or a (3) fuses. • Close jumpers.

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
7965883	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm • Remove and dispose or a (3) fuses. • Close jumpers.
20668242	[redacted]	(70 FT STEEL POLE) (38KV STD VERT TAN) (CP- C1)	(70' S8 12-SIDED GALVANIZED STEEL POLE) (38KV STD VERT DDE) (OPS-CP-C9) (REC-2-1)	• Remove and dispose of a 70 ft steel • Replace with 70' S8 12- sided galva steel pole. • Remove, dispose and replace 3 framing. • Remove, dispose and replace p framing. • Install 1 kva transformer (7.62kv/120 source side. • Install Three-phase Recloser 9004-0 radial circuit. • Install and Commission Three-Phase communication kit for three-phase reclo
1000605475	[redacted]	(ASSY-1509 (QTY=3)) (42" CROSSARM)	(LABOR TO CLOSE JUMPERS(QTY=3))	• Remove and dispose of a crossarm • Remove and dispose of a (3) fuse • Close jumpers.

5330505	[redacted]	(40' H4 CONCRETE POLE) (CP-C5-XARM) (CP-A5) (CP-B5-XARM) (T-1) (STL-10) (ASSY-1509 (QTY=3)) (E-1-2-3) (F-1-3)	(50' S8 12-SIDED GALVANIZED STEEL POLE) (CP-C5-XARM) (CP-A5) (CP-B5-XARM) (T-1) (REC-3-B) (ASSY-1509) (ASSY-1505- FIG.A) (STL-10)	• Remove and dispose of a 40' H4 Cor pole. • Replace with a 50' S8 12- Sided Gal steel pole. • Remove, dispose and replace pr framing. • Remove, dispose and replace transformer. • Remove, dispose and replace streetl • Remove and dispose of a downguy. • Remove and dispose of anchor. • Remove and dispose of a (3) fuses • Install stand-off bracket assemb • Re-attach riser. • Install (2) Single-Phase Recloser 200

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
5329369	[redacted]	(65 FT C3 WODD POLE) (CP-C6- XARM) (S-6) (K-6) (ABS-3-XARM) (ASSY-1509 (QTY=3)) (E-1-2-3) (F-1-3)	(70' S8 12-SIDED GALVANIZED STEEL POLE) (CP-C6- XARM) (S-6) (K-6) (ABS-3-XARM) (REC-3-C)	• Remove and dispose of a 65' C3 wo • Replace pole with a 70' S 8 galvanized steel pole. • Remove, dispose and replace framing. • Remove, dispose and replace secon framing. • Remove and dispose of a downguy anchor. • Transfer airbreak switch. • Remove and dispose (3) fuses. • Install (3) Single-Phase Recloser 200

5329596	[redacted]	(35 FT H3 CONCRETE POLE) (CP-C6-XARM) (ASSY1509(QTY=3)) (E-1-2-3) (F-1-3) (72" CROSSARM)	(45' S5.7 12-SIDED GALVANIZED STEEL POLE) (CP-C6-XARM) (REC-3-C)	• Remove and dispose of a 35' H3 cor pole. • Replace pole with a 45' S5.7 12-Side Galvanized steel pole. • Remove, dispose and replace primar framing. • Remove and dispose of a 72" cr • Remove and dispose of a down • Remove and dispose of an anchor. • Remove and dispose of a (3) fuse. • Install (3) Single-Phase Recloser 200
6321396	[redacted]	(CP-C6-XARM) (STL-10) (K-5) (ASSY-1509(QTY=3)) (42" CROSSARM)	(CP-C6-XARM) (REC-3-C) (STL- 10) (K-5)	• Remove, dispose and replace primar framing. • Remove, dispose and replace secon framing. • Remove, dispose and replace streetlight. • Remove and dispose of a 42" cross • Remove (3) fuses. • Install (3) single-phase recloser
7965995	[redacted]	N/A	(REC-3-C)	• Install (3) single-phase Recloser 200

POLE FID	Coordinates Lat./ Long	Existing	428 Replacement	Scope of Work
6318738	[redacted]	(40 FT H4 CONCRETE POLE) (CP-C6-XARM) (STL-11) (E-1-2-3) (F-1-3)	(45' S5.7 12-SIDED GALVANIZED STEEL POLE) (CP-C6-XARM) (REC-3-C) (STL-11)	• Remove and dispose of a 40' H4 cor pole. • Replace pole with a 45' S5.7 12-Side Galvanized steel pole. • Remove, dispose and replace primar framing. • Remove, dispose and replace streetl • Remove and dispose downguy and anchor. • Install (3) Single-phase Recloser 200

6318413	[redacted]	(40' S3 STEEL POLE) (CP-C6-XARM) (CP-A5) (STL-11) (E-1-2-3) (F-1-3) (ASSY-1509 QTY=3)) (42" CROSSARM)	(45' S5.7 12-SIDED STEEL POLE) (CP-C6-XARM) (CP-A5) (REC-3-C) (STL- 11)	• Remove and dispose of 40' S3 Ste • Replace with 45' S5.7 12- sided ga steel pole. • Remove, dispose and replace prim framing. • Remove, dispose and replace streetlight. • Remove and dispose of a downgu • Remove and dispose of the ancho • Remove and dispose 42" crossarm • Remove and dispose of (3) fuses. • Install (3) Single-Phase Recloser 2
NONE	[redacted]	N/A	(LABOR, cFCI(QTY=3))	• Install (3) Communicating Fault Indicator on segment id 17354375
NONE	[redacted]	N/A	(LABOR, cFCI(QTY=3))	• Install (3) Communicating Fault Indicator on segment id 29171840.

Scope Notes:

1) The work will be performed in accordance with the notes below, the Distribution Construction Standards (Concrete Base Standard) and LUMA Overhead Electrical Distribution System Manual V4, and ***APPENDIX C – Project Considerations.***

Pole Replacement

a. Remove and replace poles, including hardware in the same location. If unable to install the replacement in the same location, the pole will be installed within 3 feet.

b. Most pole installations are to replace existing pole locations; there are some new pole locations included in this scope of work. Refer to ***APPENDIX C – Project Considerations***, column C (soil area and depth impact) for the depths of the poles to be installed.

c. New guy wire/ anchors are to be installed in compliance with the LUMA OverheadElectrical Distribution System Manual within 3ft from the existing anchor. The maximum distance an anchor will be installed for a 50ft pole is 25ft from the base of the pole, within the right-of-way.

d. Vegetation clearance will be performed solely to the extent that it allows crews to conduct work and will be limited to a 10 ft radius surrounding the surface of the pole, but not to exceed the width of the right-of-way. This is for the exclusive purpose of gaining access to the pole to conduct repairs. The costs related to vegetation clearance procedures are covered in project 727558 FAASt [Region 3 -Bayamon Group C] (Vegetation). The vegetation removal process will be managed in accordance with federal and state regulations.

e. All existing overhead conductors, poles, assemblies, and attached components will be disconnected, removed, and replaced as outlined in the scope of work. When poles, assemblies, and attached components are not being replaced per the scope of work, all assemblies and components will be re-installed to the pole, with the overhead conductor re-attached to complete the installation and reconstruction of the feeder.

f. All work for this program will be performed within the current electrical right- of-way.

2) Debris will be separated and taken to an authorized waste disposal facility in compliance with applicable

federal and local regulations.

3) The construction of **access roads** is not required for this scope of work. Poles are close to the roads and are site accessible.

4) **Staging area** requirements were considered for the new equipment to be installed and the equipment to be retired. All materials will be stored and dispatched from the assigned LUMA's Regional Warehouse. The warehouse assigned is the Arecibo Regional Warehouse, whose address is [redacted]. Coordinates are [redacted]. Refer to document *Warehouse Locations.*

5) Fill, gravel, and sand **materials** will be obtained from an approved supplier as referenced in the document *LUMA Vendor Directory List.*

6) The **equipment** to be used is *a Skid Steer, Excavator, Dump truck, Manlift, 120- ton Motor Crane, Boom Trucks, 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine, and Flatbed platform*.

7) Specific List of **Permits Required**:

a. Department of Transportation and Public Works - (DTOP) Endorsements & Municipality Notifications
b. Excavation and Demolition Notification in the Department of Transportation and Public Works Agency - (DTOP)
c. LUMA will provide proof of all permits.

Proposed 406 Hazard Mitigation Scope of Work

This version of the project will be fully funded using PA 428 funds. A future version of this project may contain PA 406 HM measures.

PROJECT COST ESTIMATE (PCE)

The estimated costs (Class 3 Accuracy +/-30%) to complete the project are captured in the table(s) below. The cost estimate was developed utilizing preliminary Architectural and Engineering design information and is subject to being updated. LUMA has allocated 10% of the project cost to mitigate potential known risks. For more details refer to **APPENDIX B - LUMA Project Cost Estimate.**

COST ESTIMATE			
Cost Element	**428**	**406**	**PROJECT TOTAL**
PLANNING	**$108,675.98**	**$-**	**$108,675.98**
MANAGEMENT	**$66,649.35**	**$-**	**$66,649.35**
Distribution Automation Group 26	**$1,299,552.33**	**$-**	**$1,299,552.33**
GENERAL CONDITIONS	**$69,567.78**	**$-**	**$69,567.78**
COST TOTALS	**$1,544,445.44**	**$-**	**$1,544,445.44**
DEDUCTIONS	**TOTAL INSURANCE PROCEEDS RECEIVED**		**$-**

	DE-OBLIGATION TO FAASt IF APPLICABLE	**$-**
FAASt ALLOCATIONS	FAAST 757692 428-	**$938,783.63**
	FAST 757692 406HM-	**$-**
	FAAST 757692 TOTAL	**$938,783.63**
	FAASt A&E # 335168 - 428	**$175,325.33**
	FAASt A&E # 335168 - 406 HM	**$-**
	FAASt A&E # 335168 TOTAL	**$175,325.33**
	FAASt E&M #673691 - 428	**$430,336.48**
	FAASt E&M #673691 - 406 HM	**$-**
	FAASt E&M #673691 TOTAL	**$430,336.48**

Work To Be Completed (WTBC): $1,544,445.44

A&E Deduction (Global A&E FAASt 335168): $175,325.33

Equipment & Material Deduction (Global FAASt 673691): $430,336.48

Project Total Cost: $938,783.63

Project Notes:

1. Refer to detailed SOW provided in document “757692- DR4339-PR- DSOW- Group 26- Rev. 2.pdf”

2. Refer to detailed cost estimate summary provided in document “757692-DR4339PR- Cost Estimate Group 26-Rev. 2.xlsx”.

3. This project is part of a FAAST project, please reference project 136271.

4. A&E cost included in this project will be reduced from this project and obligated under the FAASt Project #335168 A&E, as shown in the table above. The A&E project was obligated to track and account for cost associated with individual FAASt projects.

5. Equipment and material costs included in this project will be reduced from this project and obligated under FAASt Project #673691, Equipment and Materials. Only the base cost of equipment and/or material will be reduced from this project (not labor). All costs associated with Planning, Management, General Conditions, and Contingencies will remain in this project Group 26 Automation Program FAASt 757692.

6. For attachments, refer to:

    a. 757692-DR4339PR-APPENDIX A - Initial Scope of Work

    b. 757692-DR4339PR-APPENDIX B - LUMA Project Cost Estimate

    c. 757692-DR4339PR-APPENDIX C - Project Considerations

    d. 757692-DR4339PR-APPENDIX D - LUMA Active Projects

406 HMP Scope

406 Hazard Mitigation measures were not requested by the sub-applicant for this project in Version 0. However, there may be mitigation opportunities that will apply to

Cost

Code	Quantity	Unit	Total Cost	Section
9001	1	Lump Sum	$1,544,445.44	Uncompleted
9001	1	Lump Sum	($430,336.48)	Uncompleted
3510	1	Lump Sum	($175,325.33)	Uncompleted
9201	1	Lump Sum	$0.00	Completed

CRC Gross Cost	$938,783.63
Total 406 HMP Cost	$0.00
Total Insurance Reductions	$0.00
CRC Net Cost	$938,783.63
Federal Share (90.00%)	$844,905.27
Non-Federal Share (10.00%)	$93,878.36

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- The Subrecipient provided the estimate for this PW. FEMA validated the estimate and found it to be reasonable for the work to be performed.

Insurance

Additional Information

6/4/2025

Does the Applicant have a Commercial Policy: Yes.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No.

Property insurance coverage for the electrical distribution facilities represented on this project are not insured or insurable. No insurance relief is anticipated. No Obtain and Maintain requirement will be made.

FEMA requires the applicant to take reasonable efforts to pursue claims to recover insurance proceeds that it is entitled to receive from its insurer(s). In the event that any insurance proceeds are received for these expenses those proceeds must be reduced from FEMA Public Assistance funding to ensure no duplication of benefits has occurred.

No duplication of benefits from insurance is anticipated for work described in this application. In the event any part or all costs are paid by an insurance policy, a duplication of benefits from insurance will occur. Applicant must notify grantee and FEMA of such recoveries and the Sub-Grant award amount must be reduced by actual insurance proceeds.

No insurance requirements will be required for this project. Insurance requirements are specific to permanent work to replace, restore, repair, reconstruct, or construct buildings, contents, equipment, or vehicles. (FEMA Recovery Policy FP 206-086-1).

No insurance narrative will be produced or uploaded into documents or attachments.

Jean-Carlo Echevarria, PA Insurance Specialist, CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Automation Program Group 26] (TL / Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Automation Program Group 26] (TL / Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders? **Yes**

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- The Subrecipient and/or Subrecipient's contractor must follow the Low Impact Debris Removal Stipulations (LIDRS) outlined in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022.
- The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities.
- The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an

asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements.

- Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.
- Applicant must obtain any required permits from the Puerto Rico Permits Management Office (OGPe) prior to initiating work and comply with any conditions of the permit established by the Planning Board (JP) for constructions in floodplains. All coordination (emails, letters, documented phone calls) pertaining to these activities and compliance must be provided and maintained in the Applicants permanent files.
- Pursuant to Stipulation lll.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm.
- Additional staging areas and/or work pads within work site area haven't been identified yet. The Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out.
- If there are any further changes to the SOW, including any increase in the extent of ground disturbance, the applicant must notify FEMA beforehand, prior to engaging in further activities not within the current SOW.
- All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g. a new pit, agricultural fields, road ROWs, etc.) in Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and execute orders prior to a subrecipient or their contractor commencing borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at closeout.
- Puerto Rican boa (PR boa; Chilabothrus inornatus) and Virgin Islands Boa (VI boa; Chilabothrus granti) for Feeder 9004-08. 1. Inform all project personnel about the potential presence of the Puerto Rican (PR) boa and Virgin Islands (VI) boa in areas where the proposed work will be conducted and provide training on PR and VI boa identification. A pre-construction meeting will be conducted to inform all project personnel about the need to avoid harming these species. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973. An educational poster or sign with photo or illustration of these species will be displayed at the project site. 2. Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area and any area to be excluded and protected will be clearly marked in the project plan and in the field to avoid further habitat degradation outside of the footprint of the project. 3. Once areas are clearly marked, and right before the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), biologist or designated project personnel with experience on these species will survey the areas to be cleared to verify the presence of any PR or VI boa within the Action Area. If a PR or VI boa is found during the search, it should be captured and managed as per #6 below. Once the removal of vegetation begins, the biologist or designated personnel must remain at the work site and be ready to capture any boa that might be in harm s way as the result of the habitat disturbance (see #6). 4. For VI boas, once the Action Area has been searched, vegetation will be cut about one meter above ground prior to the use of heavy machinery for land clearing. Cutting vegetation by hand will allow VI boas present on site to move away on their own to adjacent available habitat. If there is no suitable habitat adjacent to the project site, any VI boa found will be relocated accordingly (see #6).
- 5.For all boa sightings (dead or alive), record the time and date of the sighting and the specific location where it was found. Data will also include a photo of the animal (dead or alive), relocation site GPS coordinates, time and date of the relocation, and comments on how the animal was detected and its behavior. 6.If any PR or VI boa (dead or alive) is found within the Action Area and on harms way, the action will stop, and information will be recorded (see #5). All attempts will be made to immediately safely capture and relocate the animal within suitable habitat (forested) at least 1km from the Action Area and away from construction areas. PR boa relocation sites will be pre-determined before the project starts and sites shared with the Service for revision and concurrence. Relocation of PR boas will be conducted by trained, designated personnel ensuring the animal is not harmed or injured during the capture and relocation process. 7.Measures will be taken to avoid and minimize PR boa and VI boa casualties by heavy machinery or motor vehicles being left in the Action Area. -Any heavy machinery left on site (staging areas) or near potential PR or VI boa habitat will be thoroughly inspected each morning before work starts to ensure that no boas have sheltered within engine compartments or other areas of the heavy machinery. If a PR boa or VI boa is found within vehicles or heavy machinery, boas will be safely captured accordingly. If not possible, the animal will be left alone until it leaves the vehicle or machine by itself. -The PR boa and VI boa may seek shelter within debris piles. Measures should be taken to avoid and minimize boa casualties associated with sheltering in new debris piles as aresult of project activities. New debris piles should be placed in areas as far as possible from forested areas. Prior to moving, disposing, or shredding, debris piles should be carefully inspected for the presence of PR boas and VI boas. If debris piles will be left on site, we recommend they be placed in an undisturbed area. -In the event a PR boa and VI boa is found dead within the project area, the Federal Agency and the Recipient must contact the Service to appropriately dispose the animal. -If a PR boa or a VI boa is accidentally injured or killed during capture and relocation activities during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether

modifications are warranted. -Should the forms of take reach the amount of exempted take during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. For questions and to submit reports, the Services Point of Contact (POC) is Jose Cruz-Burgos, Endangered Species Coordinator, and can be contacted at: Mobile: 305-304-1386 Office phone: 786-244-0081 Office Direct Line: 939-320-3120 Email: Caribbean_es@fws.gov or jose_cruz-burgos@fws.gov

- The Applicant shall ensure best management practices are implemented to prevent erosion and sedimentation to surrounding, nearby or adjacent wetlands. To ensure that wetlands are not adversely impacted, per the Clean Water Act and Executive Order 11990, equipment storage and staging of construction materials and machinery must be in a location that would prevent erosion and sedimentation.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Automation Program Group 26] (TL / Distribution)**.

Final Reviews

Final Review

Reviewed By Not Reviewed **Reviewed On** Not Reviewed

Review Comments

No comments available for the Final Review step

Recipient Review

Reviewed By Not Reviewed **Reviewed On** Not Reviewed

Review Comments

No comments available for the Final Review step

Project Signatures

Reviewed By Unsigned **Reviewed On** Unsigned

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of $938,783.63 for subaward number 108035 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	9/3/2025	$844,905.27	90%	Accepted	4339DRPRP01080351

Department of Homeland Security
Federal Emergency Management Agency

v0

General Info

Project #	790443 **P/W #** 108070	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)	**Event**	4339DR-PR (4339DR)
Project Size	Large	**Declaration Date**	9/20/2017
Activity Completion Date	9/20/2027	**Incident Start Date**	9/17/2017
		Incident End Date	11/15/2017
Process Step	Obligated		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #1472687; FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Pole and Conductor Repair -San Juan Group 3 Phase 2
- **Facility Description:** The specific facilities included in this project are poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cables, underground cable systems, and fault interrupting equipment (fuses, reclosers, and sectionalizes).
- **Approx. Year Built:** 1980
- **Start GPS Latitude/Longitude:** [redacted]
- **End GPS Latitude/Longitude:** [redacted]

Final Scope

1472687 **FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)**

INTRODUCTION

This document is to submit for COR3 and FEMA approval the Detailed Scope of Work (SOW) for 790443 Distribution Pole and Conducto Repair – San Juan Group 3 - Phase 2 Project under DR- 4339-PR Public Assistance. The document provides a detailed project description including scope, schedule, cost estimates, and Environmental and Historic Preservation (EHP) requirements; LUMA Energy is seeking approva from COR3 and FEMA for project funding to repair, restore, or replace the eligible facilities.

LUMA submits this Detailed SOW under the Transmission and Distribution Operations & Maintenance Agreement between Puerto Rico Electric Power Authority (PREPA), the Puerto Rico Public-Private Partnerships Authority (P3A), and LUMA Energy, and in accordance with the Conser to Federal Funding Letter issued by PREPA and P3A, which collectively provides the necessary consent for LUMA Energy, as an agent o PREPA, to undertake work in connection with any Federal Funding requests related to the T&D System submitted to FEMA.

FACILITIES

Facilities Description

The interconnected and inter-functional distribution feeders (sites) that are the object of this scope of work are part of the electrical distribution system in the San Juan Region. All the feeders originate from a substation (start) and serve customers along the route to various locations (end). The coordinates shown below as "GPS End" represent the end of each feeder's mainline backbone.

Facilities List

The table below describes three distribution feeders being replaced as part of the project. The table identifies the GPS location of the line segments, the voltage level, and an indication of the extent of work by identifying the number of poles to be replaced.

Name	Feeder Number	# Of Poles to Replace	GPS Start	GPS End[KGF1]	Phase	Voltage Level (kV)	Constructed Date
LLORENS TORRES, SUB. 1118	1118-10	4	[redacted]	[redacted]	1 Phase	13.2	More than 20 years
BERWIND, SUB. 1337	1336-08	1	[redacted]	[redacted]	1 Phase	13.2	More than 20 years
PARQUE ESCORIAL, SUB. 1620	1620-02	3	[redacted]	[redacted]	1 Phase	13.2	More than 20 years

PROJECT SCOPE OF WORK

The project's scope is the replacement of poles and the repair of conductors for specific feeders in the San Juan region, to be performed under the "Proposed 428 Public Assistance Scope of Work". Each work type specific to said scope of work for this group is included below.

The proposed restoration includes the replacement of eligible disaster damage up to required codes and standards and the request to upgrade undamaged infrastructure to fully effectuate the restoration of disaster-damaged components and restore the system's function to an approved industry standard. The Scope of Work consists of the removal and replacement of the following infrastructure to restore this facility to codes and standards.

A. Proposed 428 Public Assistance Scope of Work

Feeder 1118-10 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	1	45FT S5.7 GALV STEEL	1
40' CONCRETE	3	45FT S5.7 GALV STEEL	3

Feeder 1336-08 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	1	45FT S5.7 GALV STEEL	1

Feeder 1620-02 Scope:

Remove	Quantity	Install	Quantity
35' WOOD	2	45FT S5.7 GALV STEEL	2
40' WOOD	1	45FT S5.7 GALV STEEL	1

B. Scope Notes

The work includes the following actions:

A. Pole Replacement

1. Remove existing poles, including hardware, and install new poles, including hardware, in the exact location. If the replacement cannot be installed in the precise location, the pole will be installed within 3 feet.

2. All pole installations are to replace existing pole locations; no new locations are included in this scope of work. For the depths of the poles to be installed, refer to **APPENDIX C—Project Considerations**, column C (Soil area and depth impact).

3. The existing foundation will be removed and replaced with a new concrete foundation base as per the Distribution Construction Standards (Concrete Base Standard). The maximum auger width to be used is 42" and the maximum depth to be drilled is 15 feet. Refer to **APPENDIX C – Project Considerations** column I (Concrete Foundation) for specific locations where this work applies.

4. New guywire/–anchors are to be installed within 3 feet of the existing anchor in compliance with the LUMA Overhead Electrical Distribution System Manual. The maximum distance an anchor will be installed for a 50-foot pole is 25 feet from the base of the pole, within the right-of-way.

5. Vegetation clearance will be performed solely to the extent that it allows crews to conduct work and will be limited to 10 feet radius surrounding the surface of the pole but not to exceed the width of the right-of-way for the exclusive purpose of gaining access to the pole to conduct repairs. The costs related to Vegetation clearance procedures are in projects [727691] FAASt [Region 1 -San Juan Group C] (Vegetation) and [723883] FAASt [Region 1 -San Juan Group A] (Vegetation). The vegetation removal process will be managed according to federal and state regulations.

6. All work for this program will be performed within the current electrical right-of-way.

B. Material Disposal:

1. PCBs, oil from the transformer and breakers, sealants, and other chemical wastes typical of a construction site are considered hazardous waste and will be disposed of by the contractor in authorized facilities per applicable federal and state regulations. Refer to the *Waste Management Plan* in the applicant profile.

2. Debris to be removed includes *Waste Management Plan* in the applicant profile.

3. Transformers will be contained and returned to LUMA in compliance with applicable federal, state, and local regulations. Removing the transformer will require testing the existing oil for PCB levels. The oil will be drained and delivered to the authorized waste disposal site per environmental regulations. Refer to the *Waste Management Plan* in the applicant profile.

C. Access Roads:

1. Poles are close to the roads and are site accessible with existing access points at the established locations. **The construction of access roads is not required for this scope of work.** Refer to **APPENDIX C—Project Considerations** in column G, "Site Accessible."

C. Staging Area :

1. All materials are stored and dispatched from the San Juan Regional Warehouse ([redacted]). Refer to *Warehouse Locations* in the applicant profile. No additional or temporary staging areas are required.

D. Fill, Gravel, Sand, etc.

1. Fill, gravel, and sand materials will be obtained from an approved supplier as referenced in the LUMA Vendor Directory List in the applicant profile. LUMA will retain and make available for review the documentation provided by material suppliers.

E. List of Equipment to be used:

1. Skid Steer , Excavator, Dump trucks, Manlifts, 120-ton Motor Crane, Boom Trucks, 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine, and Flatbed platform.

2. Vegetation will be brushed utilizing machete, chainsaw, electric pruner, telescopic pole pruner, bucket truck, and/or chipper.

G. Specific List of Permits Required:

1. DTOP Endorsements & Municipality Notifications.
2. Excavation and Demolition Notification in the Department of Transportation and Public Works Agency - (DTOP).

B. <u>Proposed 406 Hazard Mitigation Grant Program Scope of Work</u>

406 Hazard Mitigation Proposal
This version of the project will be fully funded using PA 428 funds. A future version of this project may contain PA 406 HM measures.

PROJECT ESTIMATE

The estimated costs (compliant with Class 3 Accuracy +/-30%) to complete the project are captured in the table(s) below. The cost estimate was developed utilizing preliminary Architectural and Engineering design information and may be subject to change. LUMA has allocated 10% of the project cost to mitigate known risks. For more details, refer to APPENDIX B – Detailed Cost Estimate.

COST ESTIMATE			
Cost Element	**428**	**406**	**PROJECT TOTAL**

PLANNING	**$18,817**	**$-**	**$18,817**
MANAGEMENT	**$7,168**	**$-**	**$7,168**
San Juan Group 3 - Phase 2	**$222,321**	**$-**	**$222,321**
COST TOTALS	**$248,306**	**$-**	**$248,306**
DEDUCTIONS	**TOTAL INSURANCE PROCEEDS RECEIVED**		
FAASt ALLOCATIONS	**FAAST PROJECT #790443 TOTAL:**		**$186,697**
FAASt A&E # 335168 TOTAL	**$25,985**	**$-**	**$25,985**
FAASt E&M #673691 TOTAL	**$35,624.00**	**$-**	**$35,624**

Work To Be Completed (WTBC): $248,306
A&E Deduction (Global A&E FAASt 335168): -$25,985
E&M Deduction (Global E&M FAASt 673691): -$35,624.00

Project Total Cost: $186,697

Project Notes:

1. For detailed SOW please refer to document labeled: 790443-DR4339PR-Detailed SOW San Juan Group 3 - Phase 2 Rev0 428-1.pdf
2. For detailed Cost Estimate please refer to document labeled: 790443-DR4339PR-Appendix B - Detailed Cost Estimate - San Juan Group 3 - Phase 2 Rev0 428.xlsx
3. This project is part of Donor FAASt 136271 – MEPA078 Puerto Rico Electrical Power Authority (PREPA) Island Wide FAASt Project.
4. A&E cost included in this project will be reduced from this project and obligated under the FAASt Project #335168, A&E, as show in in the table above. The A&E project was obligated to track and account for costs associated with individual FAASt projects.
5. Equipment and material costs included in this project will be reduced from this project and obligated under FAASt Project #673691, Equipment and Materials, as shown in the table above. Only the base cost of equipment and/or material will be reduced from this project (not labor). All costs associated with Planning, Management, General Conditions, and Contingencies will remain in this project.
6. For reference documents Appendix A thru C, see file labeled:

   APPENDIX A - Structure Coordinates

   APPENDIX B - Detail Cost Estimate

   APPENDIX C - Project Considerations

406 HMP Scope

406 Hazard Mitigation measures were not requested by the Subrecipient for this project in Version 0. However, the mitigation opportunities will be applied in a future version of the Permanent Work Project. The project is ready for insurance completion

Cost

Code	Quantity	Unit	Total Cost	Section
9001	1	Lump Sum	$248,306.00	Uncompleted
3510	1	Lump Sum	($25,985.00)	Uncompleted
9001	1	Lump Sum	($35,624.00)	Uncompleted
9201	1	Lump Sum	$0.00	Completed

CRC Gross Cost	$186,697.00
Total 406 HMP Cost	$0.00
Total Insurance Reductions	$0.00
CRC Net Cost	$186,697.00
Federal Share (90.00%)	$168,027.30
Non-Federal Share (10.00%)	$18,669.70

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of all of its small projects and compliance with all environmental and historic preservation requirements within 180 days of the applicant's completion of its last small project, or the latest approved deadline, whichever is sooner.

Insurance

Additional Information

5/6/2025

GENERAL INFORMATION

Event: DR4339-PR

Project: SP 790443

Category of Work: Cat E - Buildings & Equipment

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Maria

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2017 to 11/15/2017

COMMERCIAL INSURANCE INFORMATION

Does the applicant have a Commercial Policy that extends coverage for this facility: Yes

Policies Issued by: Willis Towers Watson, Multinational Insurance Company and Mapfre

Policy Numbers: Willis Towers Watson (B0804Q1966F17, B0804Q14312F17, B0804Q19673F17, B0804Q19672F17, B0804Q18529F17, B0804Q14312F17, B0804Q19674F17, B0804Q18411F17, B0804Q14310F17, B0804Q11038F17, B0804Q14507F17, B0804Q14312F17)

Mapfre Praico Insurance Company (1398178000644)

Multinational Insurance Company (88-CP-000307831-2, 88-CP-000318673-0, 88-CP000318674-0, 88-CP-000318675-0, 88-CP-000318676-0, 88-CP-000318677-0)

Policy Period: From: 5/15/2017 To: 5/15/2018

Policy Limits: $300,000,000.00

RCV or ACV: Replacement Cost Value

Deductible Amount $25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No

NUMBER OF DAMAGED LOCATIONS INCLUDED IN THIS PROJECT: (1)

Damaged Inventory (DI) #1472687:

FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)

Location: San Juan, Puerto Rico

GPS Coordinates: [redacted]

Cause of Loss: Wind / Wind Driven Rain

Prior Obtain and Maintain Requirement:

No prior insurance requirements were found for this facility.

Reduction(s):

No insurance reduction will be applied to this project as coverage is not anticipated. An anticipated insurance reduction of $193,746,436.00 was applied to FAAST project #136271 for anticipated insurance proceeds for Hurricane Maria losses. For ease of reference, please see table of insurance allocations: "*PREPA Allocation Plan – All Disasters"* file.

Obtain and Maintain Requirement:

No Obtain & Maintain Requirement is being mandated for the FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution) because the facility does not meet the definition of building, equipment, contents, or vehicle.

Insurance Proceeds Statement:

FEMA acknowledges that the Applicant is in negotiations with their insurance carrier at the time of the FEMA insurance review and might have received

partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy limits. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled on a case-by-case basis.

Standard Insurance Comments

FEMA Policy 206-086-1
PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)

A. Duplication of Benefits. FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery it is entitled to for that property.

2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.

3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from their insurer(s).

…

5. If an applicant has an insurance requirement from a previous event:

a. FEMA will reduce assistance by the actual or anticipated insurance proceeds, or the amount of insurance required in the previous disaster, whichever is greater.

b. FEMA will only consider insolvent insurers, legal fees, or apportionment of proceeds as described in Section VII, Part 2(A)(3) and (4) when the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster.

FEMA Policy 206-086-1
H. Subsequent Assistance. When a facility that received assistance is damaged by the same hazard in a subsequent disaster:

1. If the applicant failed to maintain the required insurance from the previous disaster, then the facility is not eligible for assistance in any subsequent disaster.

2. Upon proof that the applicant maintained its required insurance, FEMA will reduce assistance in the subsequent disaster by the amount of insurance required in the previous disaster regardless of:

a. The amount of any deductible or self-insured retention the applicant assumed (i.e., "retained risk").

…

4. If the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster, FEMA will reduce assistance by that amount in accordance with Section VII, Part 2(A) of this policy.

Obtain and Maintain Requirements:

44 CFR § 206.253 Insurance requirements for facilities damaged by disasters other than flood.

(a) Prior to approval of a Federal grant for the restoration of a facility and its contents which were damaged by a disaster other than flood, the recipient shall notify the Regional Administrator of any entitlement to insurance settlement or recovery for such facility and its contents. The Regional Administrator shall reduce the eligible costs by the actual amount of insurance proceeds relating to the eligible costs.

(b)

(1) Assistance under section 406 of the Stafford Act will be approved only on the condition that the recipient obtain and maintain such types and amounts of insurance as are reasonable and necessary to protect against future loss to such property from the types of hazard which caused the major disaster. The extent of insurance to be required will be based on the eligible damage that was incurred to the damaged facility as a result of the major disaster. The Regional Administrator shall not require greater types and extent of insurance than are certified as reasonable by the State Insurance Commissioner.

(2) Due to the high cost of insurance, some applicants may request to insure the damaged facilities under a blanket insurance policy covering all their

facilities, an insurance pool arrangement, or some combination of these options. Such an arrangement may be accepted for other than flood damages. However, if the same facility is damaged in a similar future disaster, eligible costs will be reduced by the amount of eligible damage sustained on the previous disaster.

(c) The Regional Administrator shall notify the recipient of the type and amount of insurance required. The recipient may request that the State Insurance Commissioner review the type and extent of insurance required to protect against future loss to a disaster-damaged facility, the Regional Administrator shall not require greater types and extent of insurance than are certified as reasonable by the State Insurance Commissioner.

(d) The requirements of section 311 of the Stafford Act are waived when eligible costs for an insurable facility do not exceed $5,000. The Regional Administrator may establish a higher waiver amount based on hazard mitigation initiatives which reduce the risk of future damages by a disaster similar to the one which resulted in the major disaster declaration which is the basis for the application for disaster assistance.

(e) The recipient shall provide assurances that the required insurance coverage will be maintained for the anticipated life of the restorative work or the insured facility, whichever is the lesser.

(f) No assistance shall be provided under section 406 of the Stafford Act for any facility for which assistance was provided as a result of a previous major disaster unless all insurance required by FEMA as a condition of the previous assistance has been obtained and maintained.

Final Obtain and Maintain requirement amount will be determined during the closeout process after the final actual eligible costs to repair or replace the insurable facility have been determined.

FEMA Policy 206-086-1

F. Timeframes for Obtaining Insurance. FEMA will only approve assistance under the condition that an applicant obtains and maintains the required insurance.

The applicant must document its commitment to comply with the insurance requirement with proof of insurance.

If an applicant cannot insure a facility prior to grant approval (for example, if a building is being reconstructed), the applicant may provide a letter of commitment stating that they agree to the insurance requirement and will obtain the types and extent of insurance required, followed at a later date by proof of insurance once it is obtained. In these cases, the applicant should insure the property:

a. When the applicant resumes use of or legal responsibility for the property (for example, per terms of construction contract or at beneficial use of the property); or

b. When the scope of work is complete.

FEMA and the recipient will verify proof of insurance prior to grant closeout to ensure the applicant has complied with the insurance requirement.

An applicant should notify FEMA—in writing through the recipient—of changes to their insurance which impact their ability to satisfy the insurance requirement after it provides proof of insurance to FEMA. This includes changes related to self-insurance. If an applicant fails to do this, FEMA may de-obligate assistance and not provide assistance in a future disaster.

Jorge Parrilla, PA Insurance Specialist

CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders?	Yes

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- a. The Subrecipient and/or Subrecipient&#65533;s contractor must follow the Low Impact Debris Removal Stipulations (LIDRS) outlined in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022.
- b. Pursuant to Stipulation III.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm.
- c. Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to hardened surfaces can be provided at closeout.
- d. All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased) or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source or a commercial source that was not permitted to operate prior to the event (e.g., a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a Sub-recipient or their contractor beginning borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at close-out and must include fill type (private, commercial, etc.), name, fill site GPS coordinates (not of the company/governmental office), address, and type of material.
- The Applicant must provide documentation at close-out that proves completion of required Conservation Measures. Only for Feeder 1620-02: Puerto Rican boa (PR boa; Chilabothrus inornatus) In 2023, the Service amended a Programmatic Biological Opinion (PBO) for the Puerto Rican boa and the Virgin Islands tree boa. The below measures are included as Terms and Conditions (T&Cs) in the amended PBO (USFWS 2023). 1. Inform all project personnel about the potential presence of the Puerto Rican (PR) boa and Virgin Islands (VI) boa in areas where the proposed work will be conducted and provide training on PR and VI boa identification. A pre-construction meeting will be conducted to inform all project personnel about the need to avoid harming these species. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the Endangered Species Act of 1973. An educational poster or sign with photo or illustration of these species will be displayed at the project site. 2. Prior to any construction activity, including removal of vegetation and earth movement, the boundaries of the project area and any area to be excluded and protected will be clearly marked in the project plan and in the field to avoid further habitat degradation outside of the footprint of the project. 3. Once areas are clearly marked, and right before the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), biologist or designated project personnel with experience on these species will survey the areas to be cleared to verify the presence of any PR or VI boa within the Action Area. If a PR or VI boa is found during the search, it should be captured and managed as per #6 below. Once the removal of vegetation begins, the biologist or designated personnel must remain at the work site and be ready to capture any boa that might be in harm's way as the result of the habitat disturbance (see #6).
- 4. For VI boas, once the Action Area has been searched, vegetation will be cut about one meter above ground prior to the use of heavy machinery for land clearing. Cutting vegetation by hand will allow VI boas present on site to move away on their own to adjacent available habitat. If there is no suitable habitat adjacent to the project site, any VI boa found will be relocated accordingly (see #6). 5. For all boa sightings (dead or alive), record the time and date of the sighting and the specific location where it was found. Data will also include a photo of the animal (dead or alive), relocation site GPS coordinates, time and date of the relocation, and comments on how the animal was detected and its behavior. 6. If any PR or VI boa (dead or alive) is found within the Action Area and on harm's way, the action will stop, and information will be recorded (see #5). All attempts will be made to immediately safely capture and relocate the animal within suitable habitat (forested) at least 1km from the Action Area and away from construction areas. PR boa relocation sites will be pre-determined before the project starts and sites shared with the Service for revision and concurrence. Relocation of PR boas will be conducted by trained, designated personnel ensuring the animal is not harmed or injured during the capture and relocation process.

- 7. Measures will be taken to avoid and minimize PR boa and VI boa casualties by heavy machinery or motor vehicles being left in the Action Area. - Any heavy machinery left on site (staging areas) or near potential PR or VI boa habitat will be thoroughly inspected each morning before work starts to ensure that no boas have sheltered within engine compartments or other areas of the heavy machinery. If a PR boa or VI boa is found within vehicles or heavy machinery, boas will be safely captured accordingly. If not possible, the animal will be left alone until it leaves the vehicle or machine by itself. - The PR boa and VI boa may seek shelter within debris piles. Measures should be taken to avoid and minimize boa casualties associated with sheltering in new debris piles as a result of project activities. New debris piles should be placed in areas as far as possible from forested areas. Prior to moving, disposing, or shredding, debris piles should be carefully inspected for the presence of PR boas and VI boas. If debris piles will be left on site, we recommend they be placed in an undisturbed area. - In the event a PR boa and VI boa is found dead within the project area, the Federal Agency and the Recipient must contact the Service to appropriately dispose the animal. - If a PR boa or a VI boa is accidentally injured or killed during capture and relocation activities during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted. - Should the forms of take reach the amount of exempted take during the Action, the Federal Agency and the Recipient shall terminate the authorized activities and contact the Service within 24 hours to reinitiate consultation. The Federal Agency will consult with the Service to determine whether authorized activities should continue as proposed and whether modifications are warranted.
- For questions and to submit reports, the Service's Point of Contact (POC) is José Cruz-Burgos, Endangered Species Coordinator, and can be contacted at: Mobile: 305-304-1386 Office phone: 786-244-0081 Office Direct Line: 939-320-3120 Email: Caribbean_es@fws.gov or jose_cruz-burgos@fws.gov
- The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities. Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.
- The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements. Vegetative debris management alternatives can be leave on site, landfill disposal, or recycle. For vegetative debris leave on site, the Applicant shall apply best management practices to ensure debris will not cause encroachment in the floodplain, interference with the natural water flows; sedimentation or erosion or nearby wetlands; alteration to water quality, danger to endangered or threatened species and/or its habitats or community safety. Applicant shall ensure disposal of vegetative waste is in accordance with requirements of local, state, and federal laws, regulations, and ordinances. The contractor/applicant will be responsible for the proper management and disposition in authorized landfills or recycle facilities. Disposal or recycle evidence should by keep on Applicant file, because it can be requested at close-out. Any change or adjustment in waste management alternatives shall be submitted for EHP review.
- Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to hardened surfaces can be provided at close-out.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Pole and Conductor Repair -San Juan Group 3 Phase 2 (Distribution)**.

Final Reviews

Final Review

Reviewed By Not Reviewed

Reviewed On Not Reviewed

Review Comments

No comments available for the Final Review step

Recipient Review

Reviewed By Not Reviewed

Reviewed On Not Reviewed

Review Comments

No comments available for the Final Review step

Project Signatures

Reviewed By Unsigned

Reviewed On Unsigned

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of $186,697.00 for subaward number 108070 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	9/3/2025	$168,027.30	90%	Accepted	4339DRPRP01080701