

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

NEPR

Received:

Sep 26, 2025

6:08 PM

IN RE: PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED
ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

**SUBJECT: Motion to Submit September 2025
Monthly Collaborative Report in Compliance with
Resolution and Order of March 28, 2025**

**MOTION TO SUBMIT SEPTEMBER 2025 MONTHLY COLLABORATIVE REPORT
IN COMPLIANCE WITH RESOLUTION AND ORDER OF MARCH 28, 2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy Servco, LLC** (“ServCo”) (jointly referred to as “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“March 28th Resolution”) in which it ordered that, starting on April 27, 2025, LUMA, Genera and PREPA provide a monthly status report of the activities established in the Electrical System Priority Stabilization Plan approved by the Energy Bureau therein. *See* March 28th Resolution, p. 11. The Energy Bureau further directed that LUMA file these status reports as one (1) collaborative report, which should include, but not be limited to, a detailed discussion of each activity’s progress and any potential implementation issues and proactive solutions to the same (“Collaborative Report”). *Id.*

2. On April 28, 2025, May 28, 2025, June 28, 2025, July 29, 2025, and August 27, 2025, LUMA filed monthly Collaborative Reports in compliance with the March 28th Resolution. *See Motion to Submit April 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025; Motion to Submit May 2025 Monthly Collaborative Report in*

Compliance with Resolution and Order of March 28, 2025; Motion to Submit June 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025; Motion to Submit [July]¹ 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025; Motion to Submit August 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025.

3. On July 16, 2025, the Energy Bureau issued a Resolution and Order indicating that “[t]he two monthly reports, March and April 2025, that LUMA filed to date as the Energy Bureau required in its March 28 Resolution, cover each of the stabilization activities for which LUMA, Genera and PREPA are responsible under the March 28 Resolution”. See July 16th Resolution and Order, p. 3. The Energy Bureau also issued orders to LUMA, Genera and PREPA to address certain requirements in the next monthly report. See *id.*, pp. 3-8.

4. On August 29, 2025, the Energy Bureau issued a Resolution and Order (“August 29th Order”) in Case No. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan – December 2020* (“Federal Funding Docket”) whereby it denied LUMA’s request to modify the reporting requirements relating to the status of the activities of the 4 x 25 MW Utility-Scale BESS Project by eliminating it from the Federal Docket and preserving it only in the present docket. Nonetheless, the Energy Bureau allowed LUMA to file the monthly report on the status of 4 x 25 MW Utility-Scale BESS Project submitted in the Federal Funding Docket as part of the Monthly Collaborative Report in the present docket, as to avoid preparation of two separate reports. See August 29th Order in the Federal Funding Docket, p. 1.

¹ The Monthly Collaborative Report for July, filed on July 29, 2025, was incorrectly titled *Motion to Submit June 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025*, although the stabilization activities outlined in Exhibit 1 of said Motion referenced activities for July 2025.

5. In compliance with the March 28th Order, LUMA hereby submits, as *Exhibit 1*, the Collaborative Report for September 2025 (“The Monthly Report”), outlining the key activities and progress achieved by LUMA, PREPA, and Genera for the Electric System Priority Stabilization Plan. Pursuant to the August 29th Order in the Federal Funding Docket, LUMA also submits, as *Exhibit 2*, the monthly report on the status of the 4 x 25 MW Utility-Scale BESS Project.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** *Exhibit 1* as the monthly status report required by the March 28th Order; **accept** *Exhibit 2* as part of the monthly report outlining the status of activities for the 4 x 25 MW Utility-Scale BESS project; and **deem** LUMA, Genera and PREPA in compliance with the March 28th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of September 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified via email to PREPA, through its counsel of record Mirelis Valle Cancel, mvalle@gmlex.net and Alexis Rivera, arivera@gmlex.net, and to Genera PR LLC, through its counsel of record Luis R. Roman-Negron, lrn@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com.



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Exhibit 1

*LUMA, Genera and PREPA's Monthly Report on the Progress of the Electric System Priority
Stabilization Plan for September 2025*

Monthly Report on the Progress of the Electric System Priority Stabilization Plan

NEPR-MI-2024-0005

September 26, 2025



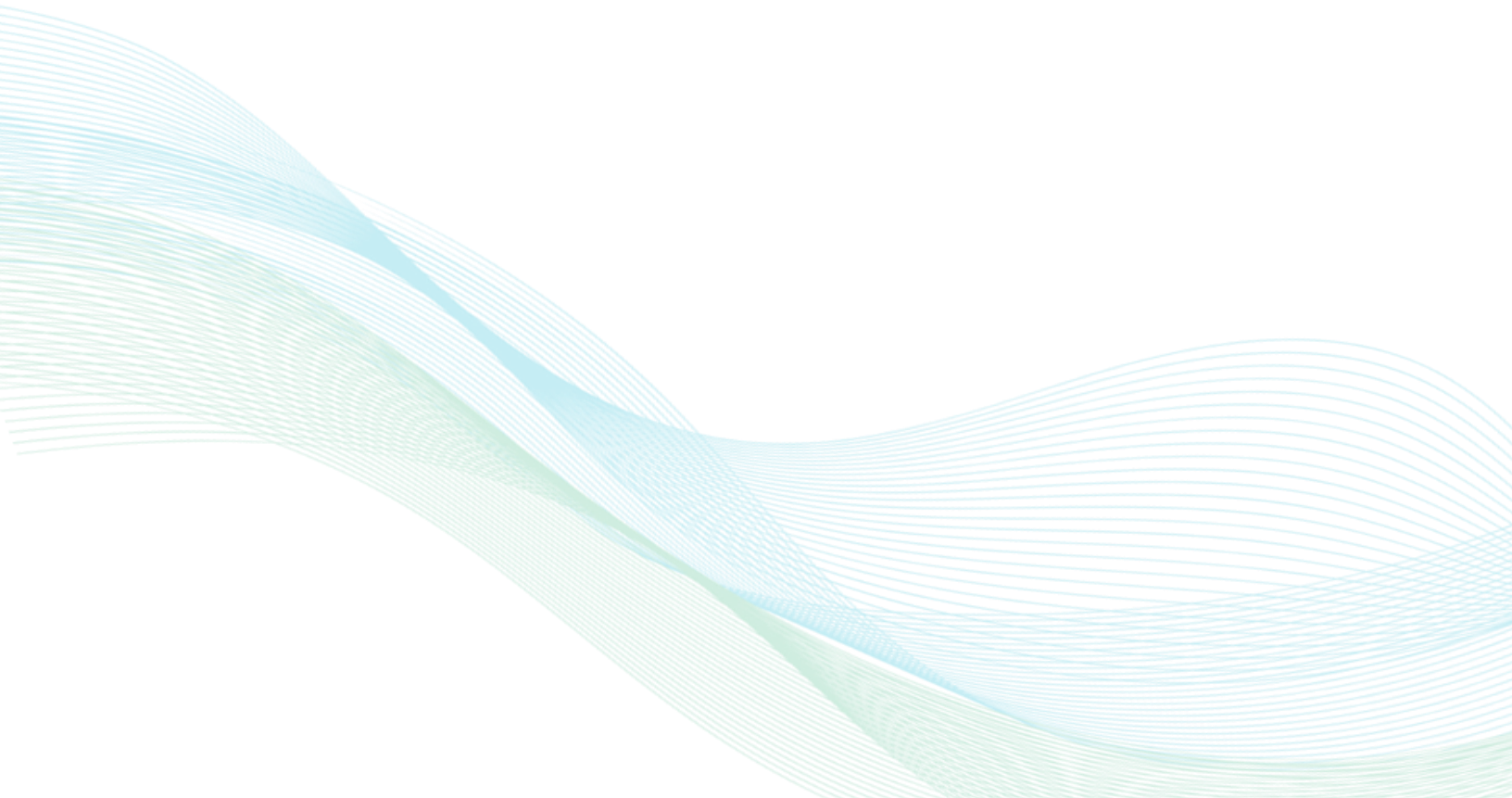
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1.0 Introduction

In accordance with the Resolution and Order dated March 28, 2025 (“March 28th Resolution”) issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2024-0005. In Re: Electric System Priority Stabilization Plan, LUMA, the Puerto Rico Electric Power Authority (PREPA) and Genera PR, LLC (Genera) are required to provide a monthly status report regarding the stabilization activities set forth in the Electric System Priority Stabilization Plan (PSP) approved therein. LUMA is tasked with filing these reports as a collaborative report. In compliance with the March 28th Resolution, this report outlines the key activities and progress achieved by LUMA, PREPA, and Genera for the PSP. The PREB established additional requirements for this report in a Resolution and Order dated July 16, 2025 (“July 16th Resolution”), which are to be addressed by each LUMA, PREPA and Genera separately.

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2.0 LUMA's Stabilization Activities

In compliance with the PREB order on March 28th, this section outlines the key activities and progress achieved by LUMA for the PSP. LUMA also addresses the applicable information requirements set forth in the July 16th Resolution.

Targeted Vegetation Management Program

Please see table below for information regarding vegetation management work completed on transmission lines.

Transmission OpEx Maintenance					
Voltage	Line	Terminal 1	Terminal 2	Miles Completed Year to Date	% Completed
38 kV	2000	11 de Agosto	Las Vegas	3.45	48%
38 kV	1500	11 de Agosto	Monte del Estado	3.45	30%
38 kV	10700	Bayamón	Dorado TC	4.8	31%
115 kV	36100	Bayamón	Monacillos	7.2	97%
115 kV	37700	Palo Seco	Bayamón	4.6	100%
115 kV	37600	Bayamón	San Juan SP	4.73	100%
115 kV	38700	Palo Seco	San Juan SP	7.04	100%
115 kV	38600	Bayamón	San Juan SP	5.76	100%
115 kV	38200	San Juan SP	Monacillos	10.87	98%
115 kV	37500	Bayamón	Rio Bayamón	1.6	80%
115 kV	39800	Acacias	Mayagüez	7.5	54%
115 kV	37500	Rio Bayamón	Monacillos	4	90%
115 kV	40100	Aguirre	Jobos	1.02	9%
115 kV	40200	Aguirre	Jobos	1.02	9%
230 kV	50700	AES	Yabucoa	23.5	76%
230 kV	50700	Aguirre	AES	12.32	98%
230 kV	50400	Costa Sur PP	Mayagüez	8	24%

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Please see table below for information regarding vegetation management work completed on distribution.

Distribution OpEx Hotspot Maintenance		
Circuit	Hotspots Cleared, Spans	Region
7403-01	253	Arecibo
7403-02	193	Arecibo
9101-01	325	Arecibo
8801-01	333	Arecibo
8302-04	212	Arecibo
9001-02	94	Arecibo
1720-07	215	Bayamón
9401-01	280	Bayamón
3010-01	169	Caguas
2702-01	455	Caguas
3501-01	307	Caguas
7901-01	328	Mayagüez
6012-03	378	Mayagüez
6010-02	112	Mayagüez
7103-01	259	Mayagüez
6703-01	195	Mayagüez
5012-04	362	Ponce
5021-01	96	Ponce
4001-03	284	Ponce
5303-01	333	Ponce
1204-05	101	San Juan
1336-07	128	San Juan
1204-02	10	San Juan
1619-03	70	San Juan
2401-01	67	San Juan
2201-01	95	San Juan

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Distribution OpEx Hotspot Maintenance		
2302-03	108	San Juan

Complete Transmission Line Hardening & Maintenance

During the month of August, LUMA conducted several repairs on transmission lines across the system. The following repairs were completed:

- **Line 4700 (Cañas TC - Adjuntas TO):** Repaired an open jumper and two hot spots.
- **Line 100 (Jobos TC - Guayama TO):** Repaired an open jumper and a broken insulator.
- **Line 1600 (León SECT - Acacias TC):** Replaced a switch and insulation.
- **Line 1900 (Dos Bocas HP - San Sebastián TC):** Repaired a hot spot and a broken crossarm, and insulation was replaced.
- **Line 2600 (San Sebastián TC - Quebradillas SECT):** Repaired a broken overhead ground wire (OHGW).
- **Line 36200 (Monacillos TC - Juncos TC):** Repaired a broken OHGW and addressed a vegetation related issue.
- **Line 500 (Ponce TC - Costa Sur SP - Cañas TC):** Repaired an open jumper.
- **Line 6500 (Toro Negro 1 HP - Barranquitas TC):** Repaired a broken conductor and addressed vegetation issues.

These maintenance activities are part of LUMA's ongoing efforts to enhance system performance, reduce operational risks, and maintain compliance with applicable reliability standards.

Work Completed on the Identified 51 Segments		
Work Completed	Aug 2025	Year To Date
Insulation & Hardware Replacement	2	17
Hot Spots Repairs	3	9
Switch Repairs	0	3
Switch Replacement	1	2
Pole Replacement	0	1
Inspections	0	9

"ASAP" Utility-Scale Battery Energy Storage System

To date, LUMA has submitted to PREB for approval six Standard Offer 1 (SO1) agreements and obtained PREB approval of these agreements and to proceed with the respective six participants. In total, this represents 259.4 MW of battery energy storage systems (BESS). Four of these SO1 Agreements have

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been approved by the PREPA Governing Board and the Financial Oversight and Management Board (FOMB). LUMA has submitted the remaining two SO1 Agreements to PREPA for approval by PREPA's Governing Board.

Site visits have been conducted for all SO1 participants, and data collection for system impact studies and facility assessments is underway. The initial scope of work, including site visits for two SO1 IPPs and the Memo of Findings, was completed by mid-June. The completion of a Feasibility Study and Steady State Study, is in progress. Technical requests for information (RFIs) required for engineering studies continue to be completed by Resource Providers.

The SO1 Agreements provide for the parties to agree on Agreed Operating Procedures within 270 days of the Closing. Significant progress was made on the AOP this past month. Multiple rounds of feedback were collected from all SO1 participants and incorporated into an AOP Preliminary Draft v2. This version was returned to SO1 participants on August 21, 2025, for feedback, and, on August 28, 2025, LUMA filed it with the PREB, along with two position papers proposed to be appendices of the AOP. These position papers defined pass-through cost mechanisms for insurance and tariff-related costs. On August 29, 2025, the PREB approved the Position Papers and proposed extension of the Early Completion Bonuses under the SO1 Agreements proposed by LUMA. The latest version of the AOP is under final review by internal LUMA teams and legal. The final AOP will include, as appendices, the Position Papers as approved by PREB.

Install 4x25 MW Utility-Scale BESS

Please refer to Exhibit 2.¹

Dynamic Stability Study and Frequency Control Implementation

LUMA has successfully replicated several past events involving the underfrequency load shedding scheme (UFLS) in the simulation tool Power System Simulator for Engineering (PSSE) used to perform transmission studies, to assess the model performance in comparison with the actual field performance. LUMA is engaged with the national laboratories to review and jointly develop its updated UFLS scheme.

The automatic under frequency load shedding schemes implemented via distribution circuit, substation, and breaker relays have been compared with the model simulation tools to identify discrepancies and develop corrective actions to verify the field settings of relays required to perform UFLS. As part of the review and corrective actions, LUMA has identified components and relays requiring troubleshooting or

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replacement as described in the UFLS section of this document. LUMA has completed the following actions:

- Developed an overall table with different frequency blocks and expected protection performance. The expected behavior was compared with actual performance during recorded events.
- Aligned UFLS relay load blocks (how much load is planned to be shed at each frequency block) as set in substations with the simulation representation in the PSSE model.
- Developed a program design document to align on the planned performance required from the UFLS scheme.
- Revised the time-load relationships required to improve UFLS scheme performance consistent with the Electric Power Research Institute (EPRI) recommendations from June 14, 2024, event report.

In July 2025, LUMA sent an RFI to generators, and coordinated with Genera and generator owners/operators on a plan and schedule for third-party services to perform generator testing. The deliverables requested in the RFI include a report documenting equipment, configuration and model parameters for each site that provides verified generator parameters, time constants, gains and controls “as-is” settings, and the PSSE dynamic model representation of each unit. LUMA sent the RFI to the generators in the first week of July 2025.

On August 2025, LUMA received information related to Generation Dynamic Model for EcoEléctrica and those models were incorporated into PPSE model.

In September 2025, LUMA met with Genera leadership to discuss the path forward on unit testing and model development. The conversation yielded positive discussions with emphasis on overcoming funding challenges to proceed with testing.

Grid Protection & Control Upgrade Program

Wide Area Protection Coordination Study:

- **230 kV line protection:** All studies have been completed. The implementation is 77% complete. Under the revised plan, nine lines are completed, two lines have completed construction and are awaiting commissioning, three lines have ongoing upgrades, and two lines are awaiting the Aguirre SP protection, automation and control (PAC) upgrade under construction.
- **115 kV line protection:** All the studies have been completed. 11% of the work order packages have been issued. Three lines have been implemented to date.
- **38 kV line protection studies:** Model validation has been completed. Initial studies are focusing on areas surrounding upcoming projects, beginning with projects at Cataño, Covadonga and six stations targeted for gas insulated switchgear (GIS) installations (Llorens Torres, Centro Medico, Tapia, Taft, Rio Grande Estates, and Egozcue). The Cataño recommendations for the 38 kV were submitted by June 2025 and new relay settings are planned to be issued by October 2025.

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Underfrequency Load Shedding Scheme:

- The PAC project includes remediations to the existing program to improve performance. Performance improvement studies and recommendations are being developed for the UFLS program by System Planning. Once the study recommendations become available, PAC will include them in the actions.
- Work is being conducted through nonfederal capital (NFC) budgets to expedite progress. Those portions that may be eligible for federal funding will be submitted as federally funded work is completed accordingly.

Underfrequency Load Shedding Scheme Improvements				
Item	Planned	In Progress	Completed	Comments
Relay replacement	8	5	3	Pending five replacements included in United States Department of Energy (DOE) initiative to be completed by Dec 2025.
Settings update	12	1	11	Initial 11 work packages completed. Pending one field confirmation. One addition based on field assessments.
Field Assessment	70	16	54	50 substations included in DOE initiative. 54 visits completed with two new setting updates identified.
Total	90	22	68	

Remote Terminal Unit (RTU) Replacements:

- There are 193 RTU replacements identified.
 - 170 will be executed under the Federal Emergency Management Agency (FEMA) in four groups (four unique obligations).
 - 23 will be executed with NFC funds, to be completed in three separate fiscal years (FYs). Schedules are subject to change due to funding.
- The six FEMA Group 1 replacements in substations with roof issues are planned for FY2026.

Remote Terminal Unit (RTU) Replacements				
Group	Planned	In Progress	Energized	Status
FEMA Group 1	23	5	18	Five are still in progress.
FEMA Group 2	28	28	0	Pending FEMA obligation. Engineering is completed.

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Remote Terminal Unit (RTU) Replacements				
FEMA Group 3	103	0	0	FEMA Project has been withdrawn- Priority changed
FEMA Group 4	16	0	0	Pending Scope of Work. Will be part of substation component replacement.
NFC FY2025	6	-	6	Completed.
NFC FY2026	10	2	0	3 out of 10 are included in the DOE initiative.
NFC FY2027	7	0	0	
Total	193	36	21	

Commence Priority Substation Rehabilitation/Rebuild Projects (Phase 1)

Completed:

- Monacillos TC 115/13.2 kV 1346 transformer: Energized in September 2025.

In Progress:

- Caguas TC Bank 1 115/38 kV Transformer: Energization remains on track expected by September 2025.
- Monacillos TC 115/38 kV Bank 1 Transformer: Energization scheduled for October 2025.
- Monacillos TC 115/38 kV Bank 3 Transformer: Energization scheduled for October 2025.
- Sabana Llana TC Autotransformer 2 230/115 kV: Transformer arrived on-island in August 2025 and is at the San Juan Port. Remains on track for January 2026 energization.
- Costa Sur Autotransformer 1 230/115 kV: Transformer Factory Acceptance Test scheduled for November 2025. Transformer delivery to the island is expected by February 2026 with energization in May 2026.
- Bayamón TC transformer 115/38 kV: Energization scheduled for November 2025.
- Factor Sectionalizer 38/13.2 kV transformer: Remains on track for February 2026 energization.
- Llorens Torres Metalclad replacement: Energization moved to May 2026 as we are awaiting issuance of the DOE award to finalize the procurement with the Metalclad vendor.
- Covadonga GIS Switchgear: Energization moved to December 2025 due to additional outages required to safely work on the GIS.

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- Guánica TC 115/38 kV Transformer replacement: Site specific Health and Safety Plan submitted to EPA and is under review. Transformer arrival to island expected by October 2025 with energization expected by Q3 FY26.
- Maunabo TC 115/38 kV transformer: Transformer arrival to island expected by October 2025 with energization expected in Q3 FY26.
- Fajardo Pueblo 2002 transformer replacement: Remains on-track for energization in December 2025.

Complete Interconnection of Approved IPP Utility Scale LUMA Renewable Capacity Addition Solar Generation and Energy Storage

- No-RFP project Ciro 1: Salinas Sectionalizer 85% construction completion (Projects interconnecting Ciro One and AES-CFE Salinas Solar and BESS).
- Tranche 1 project Yabucoa Solar (IPP: Infinigen): 60% Design review completed.
- Tranche 1 projects that have not issued Notices to Proceed (NTP) from IPPs: Guayama Solar (IPP Putman) and Tetris Power (IPP Yarotek) IPPs communicated that the new tentative date for NTP is January 2026; Barceloneta (Pattern): IPP communicated that the new tentative date for NTP is October 2025; Convergent Coamo Solar, Caguas Energy Storage, Ponce Energy Storage and Peñuelas Energy Storage: Convergent communicated that the new tentative date for NTP is October 2025.
- Tranche 1 project: Yabucoa Energy Park (IPP Go Green): Alignment meetings scheduled with IPP for next steps.
- Tranche 1 project: PREPA approved Pattern's request for capacity increase (Santa Isabel: 50 MW additional for a total capacity of 100 MW. Barceloneta: 70 MW additional for a total capacity of 120 MW). IPP has to sign LGIA to maintain project on schedule.
- Tranche 2 projects, San Juan Solar (20 MW), Marisol Power (40 MW) and CS-UR Vega Baja (60 MW). IPP and PREPA have to execute the PPOA/ESSA to maintain project on schedule.
- Tranche 4, (IPP Infinigen) IPP has to provide Signing Conditions prior to contract execution by PREPA, Public-Private Partnerships Authority (P3A) and FOMB. IPP also has to send a new PSSE model for study reviews.
- Naguabo Energy Park: Further studies after System Impact and Facility Site on-going to determine the costs and final impact on the system for the network upgrades.
- Request for Proposals (RFP) process and document package preparation continue on-going for interconnection works at San Germán Solaner and Xzerta.

Development of Comprehensive Transmission Plan

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LUMA will submit a stand-alone Transmission Plan by the established filing deadline in compliance with the March 28th and July 16th Resolutions. Additionally, LUMA's transmission planning study is planned to be filed with the Integrated Resource Plan (IRP) which has been rescheduled to a date in October 2025 or November 2025.

In November 2024, LUMA submitted the first interim filing of the IRP report to the PREB. This filing included the data required by the IRP Regulation 9021 that includes "the description of the existing transmission and distribution facilities, as well as the existing advanced grid technologies," and provides a description and summary of the transmission system and preliminary studies and findings, for which studies and project recommendations are developed.

Vegetation Clearing Program and Reclamation Efforts

LUMA has completed vegetation clearing across a total of 220.8 miles, utilizing 50 crews. The regional breakdown of miles cleared is as follows:

- Arecibo: 63.29 miles
- Caguas: 36.45 miles
- Mayagüez: 39.71 miles
- Ponce: 19.22 miles
- San Juan: 62.13 miles

Following the obligation of FEMA funds in April 2025, the program has successfully cleared an additional 127 miles in the regions of Caguas, Ponce, Mayagüez, and Arecibo.

LUMA continues to coordinate closely with the Central Office for Recovery, Reconstruction and Resilience (COR3) and FEMA to secure new funding obligations. These efforts are critical to ensuring the continuity and expansion of the vegetation management program.

It is important to note that future progress remains contingent upon the approval of new project obligations and the availability of federal funding.

Priority Substation Rehabilitation/Rebuild Projects (Phase 2)

- Cataño 1801: Remains on-track.
- Aguirre BKRS T018: Remains on-track.
- Costa Sur BKRS P001: Remains on-track.
- Monacillos TC Rebuild: Will no longer be an Engineering, Procurement and Construction (EPC) due to bids being cost prohibitive. This will now be a design-build project.
- Sabana Llana TC: Will no longer be an EPC due to bids being cost prohibitive. This will now be a design-build project.

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- Centro Médico 1 and 2: Remains on-track.
- San Juan SPPTC: Will no longer be an EPC due to bids being cost prohibitive. This will now be a design-build project.
- Rio Grande Estates 2306: Remains on-track.
- Cambalache TC Relocation: Removed from FEMA Priority List, FEMA Accelerated Awards Strategy (FAAST) number deactivated.
- Tapia GIS Rebuild: Remains on-track.

Integration of Inverter Based Resources (IBR)

On June 20, 2025, LUMA submitted to the PREB in case NEPR-MI-2019-0009 proposed updates to Technical Bulletin 2024-001 concerning smart inverter settings. These revisions are the result of a collaborative effort with the Smart Inverter Working Group (SIWG), led by the PREB. The updated bulletin refines the original content, which was based on IEEE 1547, and reflects input from stakeholders, system data, and best practices. LUMA remains committed to implementing the proposed updates promptly upon receiving PREB's guidance. On August 20, 2025, LUMA submitted to the PREB a Motion to Request Approval of Revised Smart Inverter Settings.

The plan aims to expand the applicability of the updated settings to distributed energy resources (DERs) covered under Regulations 8915 and 8916, which govern interconnection and net metering for distribution and transmission voltage levels, respectively. At the distribution level, the updates apply to DERs no larger than 1 MW, and at the transmission level, to those no larger than 5 MW.

Utility-scale IBRs continue to be governed by their Minimum Technical Requirements (MTRs), which LUMA periodically updates in response to evolving system needs and technology advancements. In addition, LUMA is currently evaluating potential updates aligned with the Institute of Electrical and Electronics Engineers (IEEE) 2800 standard. During the month of September, LUMA met twice (09/04 and 09/17) with DOE's National Labs (i.e. NREL and PNNL) to discuss potential studies related to the update of MTRs in the context of IEEE 2800 and best practices in similar islanded grids.

Enhanced Frequency Regulation and Reserve Practices

LUMA will integrate the initial BESS as an ancillary service for frequency control and spinning reserve. These systems will be dispatched under our new energy management system (EMS), which includes the automatic generation control (AGC) feature.

The frequency control and reserve monitoring are features existing under the AGC. The adequate implementation of EMS dispatch controls with the external BESS will provide additional frequency stabilization capacities and recalculation of spinning reserves, with the possibility of a decrease of online reserves.

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The new EMS hardware was received in the week of September 16, 2025, and expected for complete installation by the end of the month. Local testing of the EMS will start on October 2025 and go live on schedule for January 2026.

Assessment and Transition to Long-Term Improvement

An update will be provided at the 24-month mark per the timeline provided in the March 28th Resolution.

3.0 Genera's Stabilization Activities

In compliance with the March 28th Resolution, this section includes the description provided by Genera outlining the key activities and progress achieved in relation to the System Priority Stabilization Plan. This report includes an update regarding the most recent initiatives related to the short-term generation repairs, BESS project milestones, Peaker's units project developments and the critical components acquisitions and replacement program.

Short-term Generation Repairs: Aguirre Unit 2

The delivery of the air pre-heaters was completed in August 2025, and the installation will be completed by March 2026. Upon installation of the equipment unit output should increase by 60 MW for a total of 380MW.

Short-term Generation Repairs: San Juan Unit 6

The steam turbine rotor installation continues in schedule for December 2025.

Short-term Generation Repairs Costa Sur 5

The Unit returned to nominal load of 410MW after the load test was completed.

Short-term Generation Repairs: Palo Seco Unit 4

The contractor is performing pressure tests of air in the generator and acceptance tests of equipment. The hydrogen leaks previously detected were corrected. The unit will be in service by the end of September 2025 with a load of 200MW approximately.

Deployment of 430 MW of Utility Scale BESS

BESS Project Milestone - Important Dates:

Cambalache

- The contract for BESS installation was approved by FOMB on August 1, 2025, and by P3A on August 4, 2025.
- Weekly construction coordination meetings with RG Engineering (RGE) personnel are ongoing.
- The Interconnection Facility Study report remains in progress and is expected to be delivered to Genera by October 20, 2025.
- The Notice to Proceed was issued to RGE on August 26, 2025.
- Integra's structural study of the bridge leading to the plant entrance is ongoing. The report is expected to be delivered by September 12, 2025.

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- Genera is collaborating with LT Automation, a PREPA contractor, responsible for installing the IT/OT communications room and monopole at the Cambalache site.
- Weekly project coordination meetings are being held to monitor progress and address any issues.
- EHHS submitted the Lead and Asbestos Report to Genera on August 29, 2025. The document has been uploaded to Procore.
- The cost estimate for the transformer studies has been submitted and remains under review. Genera is currently evaluating the \$750,000 budget required for all GSU-related studies, repairs, and relocations. Confirmation of funding and execution timing is pending.

Vega Baja Plant

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

Palo Seco plant

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

Costa Sur

- Civil and structural works contract originally scheduled for submission to FOMB/P3A approval by August was moved to September 12, 2025.
- Weekly construction meetings with RGE team are ongoing.

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- LT Automation is determining the location of the IT/OT Communication Rooms and Monopole at Costa Sur.
- Issuance of a Notice to Proceed is scheduled for September 2025.

Aguirre

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

Yabucoa

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

LUMA Interconnection Studies:

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

Interconnection

- Genera and LUMA executed a Memorandum of Understanding outlining the process for handling interconnection payments. Roles and responsibilities documents are still waiting for LUMA to respond to our comments.
- Weekly coordination meetings with LUMA have been held to accelerate the process.

Permits

- The PUI Permit application is in process to be submitted soon for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa.

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- **The NPDES (National Pollutant Discharge Elimination System – Construction Stormwater)** permit for Cambalache is currently being prepared by RGE, including the required storm water pollution prevention plan (SWPPP) documentation. Submission must occur at least two weeks prior to the start of construction activities.
- Fire Department Endorsement (for all sites). Requesting quote for Hazard Mitigation Plan and Emergency Response Plan.

Procurement

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

Deploy 244 MW of Flexible Generation

The project continues to advance through its preconstruction phase, with ongoing efforts focused on demolition planning, interconnection development, and coordination with key stakeholders. The critical path remains dependent on LUMA's approval of the decommissioning plans. In preparation, Genera is evaluating alternative approaches to resubmit the unit retirement checklist, with a review meeting anticipated for September 2025.

Progress at Costa Sur continues across multiple areas. Following the issuance of the Notice of Intent to Award demolition RFP #231161 to Homeca Recycling, Genera requested the necessary documentation to proceed with contract execution, which is currently under evaluation. A meeting may be scheduled to address and resolve outstanding issues before moving forward. In August, Genera and Siemens reached agreement on Change Order #2, which modifies the balance of plant scope at Costa Sur to account for the removal of the Reciprocating Internal Combustion Engine (RICE) units. Regarding interconnection matters, the data previously submitted for Costa Sur was confirmed as unchanged and will serve as the foundation for LUMA's impact and facility study.

For the sites of Jobos, Yabucoa, and Dagua, Genera submitted additional land transfer documentation in response to LUMA's inquiries and is awaiting a reply. Meanwhile, updated technical data from RGE has been received. Based on this input, the interconnection package is being finalized and is scheduled for submission to LUMA in September 2025 to initiate their required studies.

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Progress Overview by Site

Costa Sur

- Following the Notice of Intent to Award RFP 231161 to Homeca Recycling, Genera sought the required documentation to proceed with the contract execution. The submitted documents are under evaluation, and a meeting may be held to address any remaining questions.
- In August 2025, Genera and Siemens concluded technical and commercial negotiations concerning Change Order #2, which reflects the scope of work adjustments due to the removal of RICE units at Costa Sur. The modification affects the balance of plant equipment to be supplied by Siemens, and both parties aligned on its implementation approach.
- It was confirmed that the interconnection package data previously submitted has not changed. LUMA will use this data to proceed with the impact and facility study.

Jobos, Yabucoa, and Dagua

- Additional documentation requested by LUMA, regarding the land transfer package, was delivered for their review. Genera is currently awaiting LUMA's response or comments upon their review.
- The information requested from RGE was received, and the interconnection package is being prepared for submission to LUMA in September 2025, in order to proceed with the required impact and facility study for these sites.

Unforeseen Circumstances:

- As notified by FEMA on August 8, 2025, FEMA EHP has referred to the Peaker installation project to a Higher National Environmental Policy Act (NEPA) level review evaluation and FEMA R2. Commencement of the project without a FEMA Record of Environmental Consideration (REC) may jeopardize funding. If a Higher NEPA level review determination is to complete an environmental assessment, it may take around 12 months to complete this step. Still pending FEMA determination.
- LUMA hasn't authorized the decommissioning of existing Peaker units. In a letter dated January 7, 2025, LUMA opposed Genera's decommissioning plan and requested all MW capacity substitution and an operational reserve of 810MW to concur with the unit's decommissioning request. Genera was expecting the 800MW emergency generation project to be implemented but this is still pending procurement by Third-Party Procurement Office (3PPO). Genera are currently developing a new decommissioning plan to be presented to LUMA in the following 30 days. The new peaking units cannot be installed without prior removal of the existing units, some of which are currently out of service.
- The non-PSD applicability request was submitted to Environmental Protection Agency (EPA) in November 2024 for the Yabucoa, Dagua, and Jobos sites. An amendment was submitted to

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EPA on July 28, 2025. A final determination from EPA is still pending. This determination is required to be able to begin construction.

Seek Environmental Waivers to Run the Three FT8 MOBILEPAC Units in Palo Seco on an Emergency Basis

There are no waiver requests pending approval.

Critical Component Replacement Program

The table below outlines components that have been ordered, RFP awarded, delivered or near delivery dates.

Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024
Aguirre	Costa Sur 5&6/Aguirre 1&2	Air heater baskets (cold and hot)	1	221760	Awarded	1/10/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Air Heater Baskets (cold and hot)	1	4445/21 9639	Awarded	10/8/2024
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Air Heater Baskets (cold and hot)	1	4445/21 9639	Awarded	10/8/2024
Palo Seco	Palo Seco 3&4	Air Heaters Baskets	1	4445/21 9639	Awarded	10/8/2024
Palo Seco	Palo Seco 3&4	Boiler and burners recirculation valves	2	220932	Awarded	4/30/2025
Palo Seco	Palo Seco 3&4	Breakers 480 & 4160	1	220928	Awarded	10/28/2024
San Juan	San Juan 7	Circulating pumps	2	4636	Awarded	6/16/2025
San Juan	San Juan 7	Cooling Tower	1	4608/22 2041	Awarded	3/21/2025
Mayagüez	Mayagüez	Demin RO system pump	2	220895	Awarded	10/25/2023
Mayagüez	Mayagüez	EDI system	2	220859	Awarded	8/2/2024
Palo Seco	Palo Seco 3&4	Feedwater heaters & Boiler lead valves actuators	4	221700	Awarded	1/8/2025

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3&4	Feedwater heaters & Boiler lead valves actuators	6	221700	Awarded	1/8/2025
Palo Seco	Palo Seco 3&4	Fixed screens	7	4438	Awarded	1/14/2024
Cambalache	Cambalache 3	fuel control valve	1	Sole Source	Awarded	10/21/2024
Mayagüez	Mayagüez	Fuel skid pumps	1	220837	Awarded	12/6/2024
Mayagüez	Mayagüez	Fuel Transfer Pump	1	220891	Awarded	1/31/2025
Mayagüez	Mayagüez	Fuel skid solenoid valves	2	220864	Awarded	10/11/2024
Aguirre	Aguirre CC 2-3	Generator breaker 13kv	1	220839	Awarded	10/8/2024
Palo Seco	Palo Seco 4	Recirculating valves	2	220932	Awarded	3/3/2025
Cambalache	Cambalache 2,3	Safety valve	2	221004	Awarded	11/12/2024
Palo Seco	Palo Seco 3&4	Spill over, cold reheat & superheater turbine seal steam valves	1	225589	Awarded	7/23/2025
Palo Seco	Palo Seco 3&4	Spill over, cold reheat & superheater turbine seal steam valves	1	225589	Awarded	7/23/2025
Cambalache	Cambalache 2,3	Steam bypass valve	2	220887	Awarded	10/8/2024
Cambalache	Cambalache 2,3	Steam release valve	2	220914	Awarded	10/17/2024
Aguirre	Aguirre CC 2-3	Torque converter	1	220877	Awarded	8/13/2025
San Juan	San Juan 9	Traveling screens	1	4764	Awarded	7/22/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	2	220904	Awarded	11/27/2024
Aguirre	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor	2	220904	Awarded	11/27/2024

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
		1000HP, 4000v/146rpm				
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	2	220904	Awarded	11/27/2024
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	1	220904	Awarded	11/27/2024
Aguirre	Aguirre CC	Boiler feed pumps	2	220846	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps	1	225916	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps	1	225916	Cancel	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	2	225916	Cancel	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	2	225916	Cancel	
Cambalache	Cambalache	Generator breaker 13kv	1	221012	Cancel	
Palo Seco	Palo Seco 3&4	Hydrogen cooler	1	219661(4456)	Cancel	
Palo Seco	Palo Seco 3&4	Hydrogen cooler	1	219661(4456)	Cancel	
Palo Seco	Palo Seco 3&4	Reduction in station temperatures	1	4523/220444	Cancel	
Palo Seco	Palo Seco 3&4	Reduction in station temperatures	1	4523/220444	Cancel	
Palo Seco	Palo Seco 3&4	Turning Gear Assembly	1	No competitive	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical	3	221150	FOMB	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
		Motor 700 HP, 4000v/90amp				
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp	3	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp (Purchase of motor for BCWP and CCWP of unit 5)	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp (Purchase of motor for BCWP and CCWP of unit 5)	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor *5000HP	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor *5000HP	2	221150	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor *5000HP	2	221150	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor *5000HP	2	221150	FOMB	
Aguirre	Aguirre CC	Condensing Circulating Water Pump	2	221003	FOMB	
San Juan	San Juan 5	Continuous Condenser Wash SJ5	1	4214	FOMB	
San Juan	San Juan 7	Continuous Condenser Wash SJ7	1	221530	FOMB	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Aguirre 2	Feedwater Heaters 3 *LP Horizontal	2	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 6 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 6 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Aguirre	Aguirre 1	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor *4500HP	2	221150	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor *4500HP	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	FOMB	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	FOMB	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	FOMB	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	FOMB	
Palo Seco	Palo Seco 3&4	Set of open and close hardware - honeycomb seals, etc.	1	219624	FOMB	
Palo Seco	Palo Seco 3	Water heater 5 *HP Vertical	1	221016	FOMB	
Aguirre	Aguirre CC 2-3	Turbine section Stage 1, 2 & 3	1	Sole Source	Legal Division	
Mayagüez	Mayagüez	DCS	1	Sole Source	Legal Division	
Cambalache	Cambalache	DCS	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Fill shutoff valves	1	Sole Source	Legal Division	
Aguirre	Aguirre CC 2-3	GT compressor rotor	1	221001	Legal Division	
San Juan	San Juan 5 & 6	GT compressor wash	1	Sole Source	Legal Division	
San Juan	San Juan 5 & 6	GT compressor wash	1	Sole Source	Legal Division	
Cambalache	Cambalache	High speed control	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Leakage valve	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Nozzle valve	1	Sole Source	Legal Division	
Mayagüez	Mayagüez	PI-DAS System	1	Sole Source	Legal Division	
San Juan	San Juan 5,6,7	Traveling screens	1	4724	Legal Division	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Cambalache	Cambalache 3	Trip shutoff valve	1	Sole Source	Legal Division	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Cambalache	Cambalache	Fire protection system	1		No Spec	
Cambalache	Cambalache	Leak detection system - fuel transfer line	1		No Spec	
Cambalache	Cambalache	Overhead crane	1		No Spec	
Palo Seco	Palo Seco Lab.	Demi 4 tank inlet regulation valve	0		Not required	
San Juan	San Juan 5 & 6	GT fully bladed rotor	0		Not required	
Aguirre	Aguirre CC	Cooling Tower motors	10	220871	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Deaerator pump recirculation valves	1	221007	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Deaerator pump recirculation valves	1	221007	Panel Evaluation	
Cambalache	Cambalache	Demin water resin	1	221117	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Exhaust duct	1	4433	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Fuel pump	1	220919	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Fuel pump	1	220919	Panel Evaluation	
Cambalache	Cambalache 1, 2 y 3	Starting Frequency Converter Transformer	1	4454	Panel Evaluation	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Aguirre CC 2-3	Switch gears 4kv	1	221853	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Switch gears 4kv	1	221853	Panel Evaluation	
Mayagüez	Mayagüez	Clutch removal kit	5	292339	Pending Award	
San Juan	San Juan 9	Recirculating fan duct and GRF	1		PMO	
Cambalache	Cambalache	Feedwater pump and motor	1	220919	Procurement	
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024

Definitions:

- **Awarded:** The contract or purchase order has been officially granted to the selected vendor, and the relevant documents have been signed.
- **Cancel:** The solicitation or purchase order has been terminated or withdrawn, but it is expected to be reissued later.
- **FOMB:** Under FOMB review.
- **Legal Division:** Under Legal Division review.
- **No Spec:** No Technical specifications available.
- **Not Required:** Not necessary according to GENERA-PR LLC Power Plant.
- **Evaluation Panel:** A committee of subject-matter experts (technical, financial, and/or legal) that reviews submitted bids and makes a recommendation for award.
- **Pending Award:** The evaluation phase is complete, but final approval or contract signature is still outstanding before the award can be declared.
- **PMO:** Under Project Management Office review.

4.0 PREPA's Stabilization Activities

Extend the Operation of the Seventeen (17) TM2500 Temporary Generation Units

Completed.

800 MW of Additional Emergency Temporary Base Generation for Interconnection between Aguirre and Costa Sur

An evaluation and recommendation report was provided to PREPA. After reviewing the report, PREPA requested additional information from the 3PPO. On September 22, 2025, the 3PPO submitted a response to PREPA's request. However, PREPA has determined that further information and clarifications are still necessary. Therefore, PREPA will submit additional communication.

Seek Environmental Waivers to Run the Three FT8 MOBILEPAC Units in Palo Seco on an Emergency Basis

Pursuant to the PREB's July 16, 2025, Resolution and Order, Genera must provide a status update on this task as part of its monthly reporting obligations.

Exhibit 2

Monthly Report on the Status of the 4 x 25 MW BESS Project

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report

September 26, 2025



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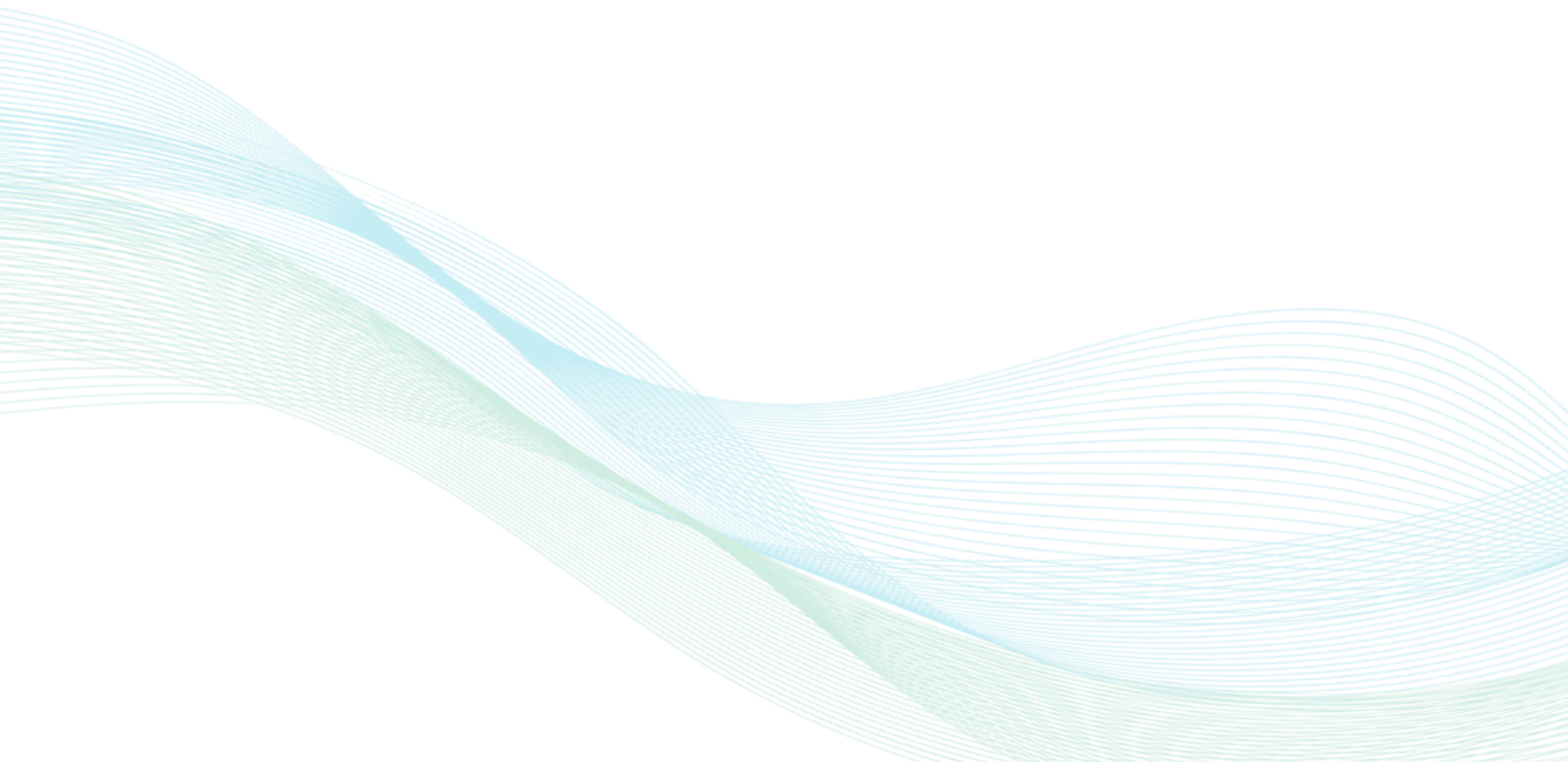
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1.0 Introduction

In accordance with the Resolution and Order dated January 14, 2025, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at LUMA 38 kV project. This report focuses on the key activities and progress achieved by LUMA in the past 30 days for the Battery Energy Storage Systems (BESS or collectively as the “Project”) approved by the Energy Bureau in its Resolution dated August 30, 2023 (“August 30th Resolution”).

2.0 Monthly Status Update

2.1 Detailed Scope of Work

LUMA has finalized the narrative for the proposed BESS initiative. This document directly addresses the Federal Emergency Management Agency’s (FEMA) soft Request for Information (RFI) and provides a comprehensive explanation of how the BESS installations are designed to mitigate the impacts of natural disasters and enhance the resilience of Puerto Rico’s electric system.

To ensure alignment among all key stakeholders and to support the advancement of the Section 406 Hazard Mitigation (HM) proposal, LUMA has established the following timeline for the next phases of review and submission:

1. Completion of Internal Quality Review – September 2025
2. Completion of Review by the Puerto Rico Electric Power Authority (PREPA) – October 2025
3. Completion of Review by PREPA and the Central Office for Recovery, Reconstruction and Resilience (COR3) – October 2025
4. Integration of Comments and Final Internal Review (including PREB, PREPA, and COR3 feedback) – November 2025
5. Submission of FEMA 406 Hazard Mitigation Justification – November 2025

LUMA remains committed to maintaining close coordination with the PREB, COR3, PREPA, and FEMA to ensure that the BESS projects are prioritized and effectively incorporated into the Consolidated Project FAAS^t List.

2.2 Procurement

Since the BESS projects have been placed as “Process Discontinued”, the procurement process will be put on hold until the projects are included in the Consolidated Project FAAS^t List and activated in the Grants Portal. LUMA’s Grants Management team updated the 406 Hazard Mitigation narrative to ensure PREPA, COR3 and FEMA are aligned allowing the BESS projects to be placed in the priority list and continue procurement efforts.

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

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2.3 Design Status

The Preliminary Design has been completed. The Detailed Design will be managed by the selected vendor through a competitive procurement process.

2.4 Project Schedule

The project schedule was impacted due to the projects being placed as “Process Discontinued” in the FEMA Grants Portal. When the projects get activated in the Grants Portal, LUMA will provide an updated schedule. The project schedule depends on LUMA being able to put projects on the priority list.

- Procurement - To be determined (TBD)
- Construction Start: TBD
- Commissioning: TBD

3.0 Project Status

3.1 Selected Sites

PREB previously approved \$4 million to support land acquisition activities for the Battery Energy Storage System (BESS) projects. However, due to the current “Process Discontinued” status of these projects in the FEMA Grants Portal, Due Diligence activities are temporarily on hold.

Specifically, the Phase 1 Environmental Site Assessment (ESA) —a critical step in the land acquisition process— cannot proceed until the BESS projects are reinstated in FEMA's Tier 1 list and reactivated in the Grants Portal.

Next steps and estimated timeline (Pending FEMA reactivation).

Table 1. Land Acquisition Milestones and Estimated Timeline

Milestone	Estimated Duration	Projected Completion
FEMA Tier 1 Inclusion & Grants Portal Activation	-	TBD (Pending FEMA)
Phase 1 ESA Initiation	2 Months	+2 Months from Activation
Land Appraisal & Due Diligence	1-2 Months	+3-4 Months
Negotiation & Legal Review	6-7 Months	+10-11 Months
Closing & Title Transfer	1 Month	+12 Months

3.2 Reimbursement Status

The reimbursement process is on hold; no reimbursement is available since the project has been placed in FEMA Grants Portal as “Process Discontinued”. Below is the reimbursement received prior to that.

4x25 MW BESS Interconnections at LUMA 38 kV System Project
Monthly Status Report
 NEPR-MI-2021-0002

Table 2. Reimbursement Received

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$47,355.27

3.3 Requests for Information

LUMA updated the hazard mitigation narrative to explain how the BESS will help to mitigate impacts to the system or create needed redundancy during natural disasters by end of September 2025. LUMA will submit the documentation to PREPA and COR3 for their review before submitting it to FEMA. The response to FEMA's soft RFI is expected to be submitted in November 2025.

3.4 FAASt Number

As indicated in Section 3.1 above, LUMA has identified four areas where it intends to site the projects. The FEMA FAASt numbers for the four BESS projects are:

Table 3. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	738671
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503

3.5 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta, Manatí, Aguadilla and San Juan Detailed Scopes of Works (DSOWs) submitted to FEMA.

Table 4. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate (\$)
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	\$55,941,767
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$57,640,005
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$52,720,520
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$55,503,065