

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

NEPR

Received:

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

CASE NO. NEPR-MI-2024-0005

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

**MOTION TO SUBMIT OCTOBER 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, August 27, 2025, and September 26, 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; Motion to Submit September 2025 Monthly Collaborative Report in Compliance with Resolution and Order of March 28, 2025.

3. 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”) in which it determined to allow 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.

4. In compliance with the March 28th Order, LUMA hereby submits, as *Exhibit 1*, the Collaborative Report for October 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;

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.

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 27th day of October 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, via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record Mirelis Valle Cancel, mvalle@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net and Natalia Zayas Godoy, nzayas@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 October 2025*

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

NEPR-MI-2024-0005

October 27, 2025



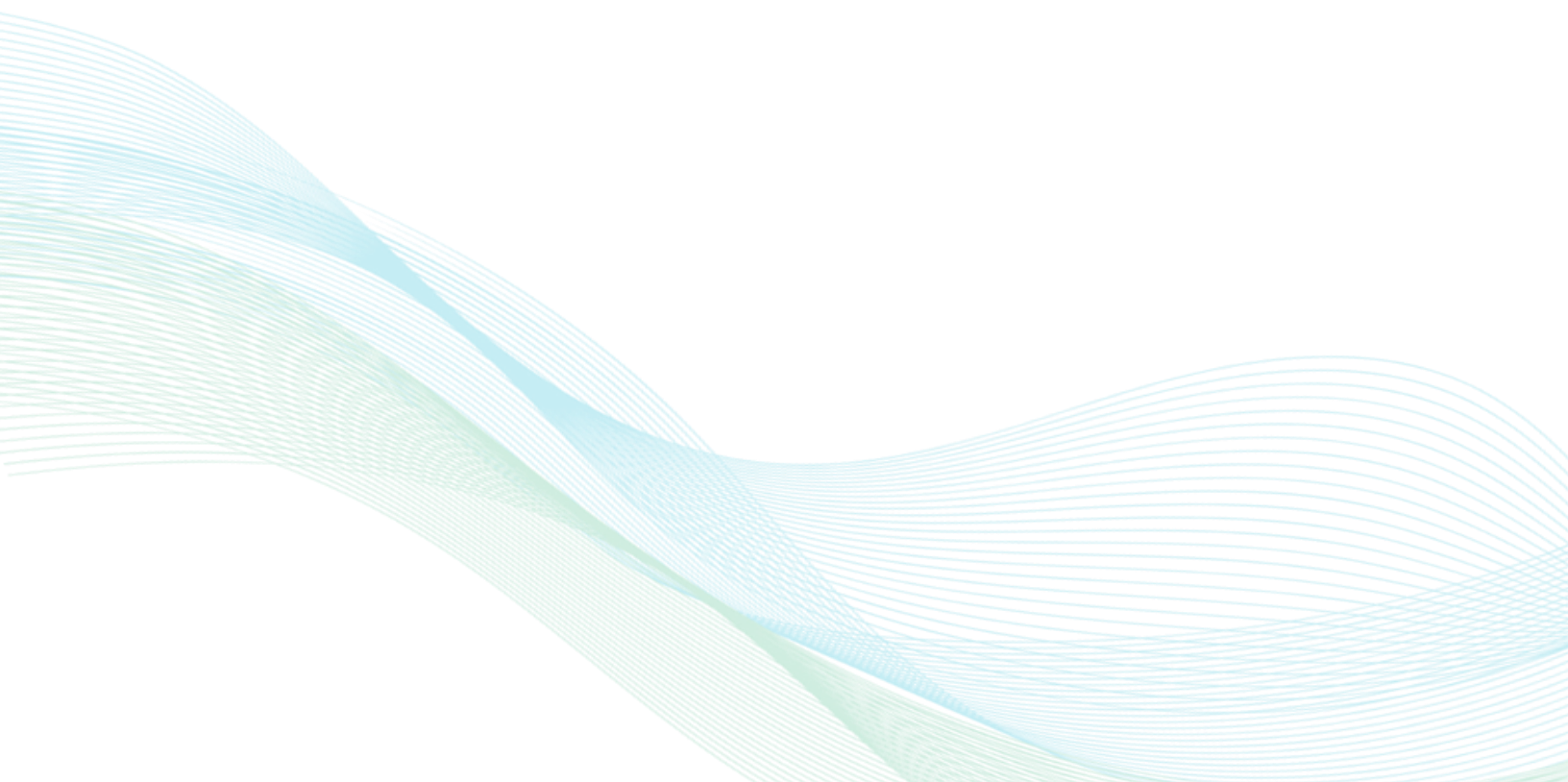
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1.0 Introduction

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

Vegetation management completed 118 miles of Distribution hotspot trimming planned work and 16 miles of Transmission maintenance work, completing 7 distribution circuits and 3 transmission line segments.

Transmission OpEx Maintenance					
Voltage	Line	Terminal 1	Terminal 2	Miles Completed YTD	% Completed
38 kV	2000	11 de Agosto	Las Vegas	6.35	89%
38 kV	1500	11 de Agosto	Monte del Estado	6.35	55%
38 kV	10700	Bayamón	Dorado	13.3	85%
115 kV	36100	Bayamón	Monacillos	7.34	97%
115 kV	38200	San Juan SP	Monacillos	11.09	100%
115 kV	37500	Bayamón	Rio Bayamón	2	100%
115 kV	39800	Acacias	Mayagüez	8	58%
115 kV	37500	Rio Bayamón	Monacillos	4.26	96%
115 kV	40100	Aguirre	Jobos	1.02	9%
115 kV	40200	Aguirre	Jobos	1.02	9%
230 kV	50200	Manatí	Bayamón	6	20%
230 kV	50700	AES	Yabucoa	23.5	76%
230 kV	50700	Aguirre	AES	12.53	100%

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

Distribution OpEx Hotspot Maintenance				
Circuit	Region	Miles YTD	Hotspots Cleared, Spans	% Completed
7403-01	Arecibo	8.9	314	87%
7403-02	Arecibo	6.1	214	54%
9101-01	Arecibo	9.5	333	93%
8801-01	Arecibo	10.0	353	92%
8302-04	Arecibo	8.7	304	88%
9001-02	Arecibo	6.0	210	85%
8004-03	Arecibo	4.5	157	79%
1720-07	Bayamón	8.5	297	14%
1908-03	Bayamón	2.0	70	13%
9801-01	Bayamón	1.1	37	2%
9401-01	Bayamón	8.5	297	34%
3007-03	Caguas	4.7	166	8%
2906-02	Caguas	6.6	231	13%
3501-01	Caguas	26.4	929	90%
3701-03	Caguas	4.6	160	8%
7901-01	Mayagüez	9.3	328	89%
6012-03	Mayagüez	15.4	543	90%
7101-03	Mayagüez	5.3	187	87%
6802-02	Mayagüez	1.1	39	38%
7103-01	Mayagüez	10.0	352	59%
6702-02	Mayagüez	1.8	62	51%
6802-01	Mayagüez	5.2	182	60%
5012-04	Ponce	11.3	399	91%
5021-01	Ponce	8.2	290	59%
4001-03	Ponce	12.0	422	80%
4201-04	Ponce	2.4	85	17%

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Distribution OpEx Hotspot Maintenance				
Circuit	Region	Miles YTD	Hotspots Cleared, Spans	% Completed
4003-01	Ponce	0.7	26	5%
5303-01	Ponce	10.6	374	73%
6601-03	Ponce	4.2	146	28%
1336-07	San Juan	3.7	128	81%
1204-02	San Juan	3.2	112	30%
1908-03	San Juan	1.2	42	28%
1204-03	San Juan	1.4	50	57%
2401-01	San Juan	4.5	157	30%
2201-01	San Juan	3.2	112	45%
3010-01	Caguas	12.8	449	100%
2702-01	Caguas	30.5	1075	100%
6010-02	Mayagüez	6.3	222	100%
6703-01	Mayagüez	5.6	195	100%
1204-05	San Juan	4.2	148	100%
2302-03	San Juan	3.1	108	100%
1619-03	San Juan	2.5	88	100%

Complete Transmission Line Hardening & Maintenance

During the month of September, corrective maintenance was performed on several transmission lines. Hot spots were repaired, and insulation was replaced on the following lines:

- Line 1900: Dos Bocas HP – San Sebastián TC
- Line 7800: Dorado TC – Vega Alta Sect
- Line 3300: Viaducto TC – Egozcue Sect

In addition, switch repairs were completed on:

- Line 100: Jobos TC – Guayama TO
- Line 2700: Aguadilla Hospital Distrito Sect – Mora TC.

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Work Completed on the Identified 51 Segments		
Work Completed	September 2025	Year To Date
Insulation & Hardware Replacement	25	42
Hot Spots Repairs	6	15
Switch Repairs	3	6
Switch Replacement	0	2
Pole Replacement	0	1
Inspections	18	27

"ASAP" Utility-Scale Battery Energy Storage System

- The PREB issued a Resolution and Order on September 26th whereby they ordered a 'Stay' temporarily suspending the ASAP initiative but has since vacated it via a Resolution and Order issued on October 3rd. There, LUMA was ordered "to offer the Phase 1 SO1 to Phase 2 proponents that are interested."
- On October 10th, LUMA filed a motion where it informed the PREB that there were several issues associated with the SO1 template that need to be addressed and/or resolved prior to distribution of the SO1 to Phase 2 proponents. Those issues were analyzed and were submitted to the PREB's consideration on October 21st.
- On October 21st, the PREB reiterates the order from October 3rd Resolution. LUMA shall identify and notify potential candidates that agree without reservations by October 27th and within five days thereafter shall proceed with the submittal of such contracts before the PREB for its review and approval. On October 27, LUMA distributed the SO Agreement reflecting the terms offered to Phase 1 participants, including all subsequent negotiated additions and agreed conditions incorporated through the course of those discussions to Phase 2 qualified proponents.
- Six Standard Offer 1 agreements have been approved by the PREB totaling 268 MW of battery energy storage system (BESS). One Resource Provider has already submitted all signing conditions and is awaiting PREPA's execution. Three participants are in the process of completing signing conditions prior to PREPA execution. The remaining two are awaiting PREPA and Financial Oversight and Management Board (FOMB) approval prior to execution.
- A&E Contractor has provided draft facility studies results and are currently under LUMA review. Technical requests for information (RFIs) required for engineering studies continue to be completed by Resource Providers.

Significant progress was made on the Agreed Operating Procedures (AOP) defining pass-through cost mechanisms for insurance and tariff-related costs. AOP Preliminary Draft v3, was distributed to SO1 participants and external legal in September for further review. The PREB approved the position papers and the proposed extension of the Early Completion Bonuses on August 29, 2025. Per request by SO1

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participants, the position papers will now be included in the Standard Offer agreement versus an appendix in the AOP.

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 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.

¹ 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”) in which it 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. LUMA is submitting, as *Exhibit 2*, the monthly report on the status of the 4 x 25 MW Utility-Scale BESS project.

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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.

In October 2025, LUMA met with AES leadership to discuss the path forward on unit testing and model development. LUMA expects to see continued progress.

Note that as of October 2025, all generator operators have expressed concerns with costs and with potential for unintended impacts to their units as being potential barriers that need to be overcome.

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.

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	4	4	Pending five replacements included in United States Department of Energy (DOE) initiative to be completed by Dec 2025.

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Underfrequency Load Shedding Scheme Improvements				
Settings update	12	1	11	Initial 11 work packages completed. One addition based on field assessments. Engineering for the last one is underway.
Field Assessment	70	-	70	50 substations included in DOE initiative. All visits completed.
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.

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.
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	1	2	3 out of 10 are included in the DOE initiative.
NFC FY2027	7	0	0	
Total	193	34	26	

Commence Priority Substation Rehabilitation/Rebuild Projects (Phase 1)

Completed:

- Bayamón TC Autotransformer 230/115 kV: Energized in July 2024
- Hato Rey TC 115/13.2 kV 44MVA transformer: Energized in November 2024
- Santa Isabel TC - 115/13.2 kV 56MVA transformer: Energized in November 2024

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- Monacillos TC 115/13.2 kV 1346 transformer: Energized in September 2025
- Caguas TC Bank 1 115/38 kV Transformer: Energized in October 2025

In Progress:

- Monacillos TC 115/38 kV Bank 1 Transformer: Energization scheduled for November 2025.
- Monacillos TC 115/38 kV Bank 3 Transformer: Energization scheduled for November 2025.
- Sabana Llana TC Autotransformer 2 230/115 kV: Transformer arrived on-island. 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 December 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 January 2026 due to additional outages required to safely work on the GIS.
- 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 arrived on island in October 2025 and is at San Juan Port. Energization scheduled for February 2026.
- Fajardo Pueblo 2002 transformer replacement: Remains on-track for energization in December 2025.

Complete Interconnection of Approved Independent Power Producer (IPP) Utility Scale LUMA Renewable Capacity Addition Solar Generation and Energy Storage

- Non- Request for Proposals (RFP) project Ciro 1: Salinas Sectionalizer 85% construction complete (Projects interconnecting Ciro One and AES-CFE Salinas Solar and BESS).
- Tranche 1 project Yabucoa Solar (IPP: Infinigen): 90% Design scheduled for completion in January 2026.
- 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

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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.
- 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.
- 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 must 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 must execute the PPOA/ESSA to maintain project on schedule.
- Tranche 4, (IPP Infinigen) IPP must 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.
- San Germán Solaner 60% Design review scheduled for December 2025.
- Xzerta IFC scheduled for January 2026.

Development of Comprehensive Transmission Plan

LUMA will submit a stand-alone Transmission Plan by the established filing deadline in compliance with the March 28th and July 16th Resolutions.

On Friday October 17, 2025, LUMA submitted a Transmission and Distribution Plan Report as Appendix I filed with the Integrated Resource Plan (IRP). Additional Transmission and Distribution Plan Reports are also planned to be submitted on November 21, 2025, to include transmission investments required to facilitate the IRP Preferred Resource Portfolio.

Vegetation Clearing Program and Reclamation Efforts

LUMA has completed vegetation clearing across a total of 273.9 miles, utilizing 50 crews. The regional breakdown of miles cleared is as follows (data is as of 10/15/25):

- Arecibo: 69.24 miles
- Caguas: 50.06 miles
- Mayagüez: 40.32 miles
- Ponce: 40.31 miles

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- San Juan: 74 miles

Following the obligation of FEMA funds in April 2025, the program has successfully cleared 199.93 miles in the regions of Caguas, Ponce, Mayagüez, and Arecibo.

An additional 26.76 miles were obligated across four 115 kV transmission lines, with clearing work scheduled to start on 11/10/25. LUMA has been collaborating with FEMA to obligate an additional 54.94 miles on those four transmission lines in parallel with executing vegetation clearing on obligated segments.

LUMA continues to coordinate closely with 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. 38 kV Gas insulated Switchgear (GIS) arrived on island in October 2025.
- 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.
- 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 Institute of Electrical and Electronics Engineers (IEEE)

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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.²

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 technological advancements. In addition, LUMA is currently evaluating potential updates aligned with the 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. A follow-up meeting was held on October 17 to conclude the initial discussions. As a result, LUMA and National Labs agreed to continue collaborating on studies that support both immediate MTR updates and those requiring further analysis. A research proposal from the National Labs is expected within the next month.

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.

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.

² The Puerto Rico Solar Energy Industries Association Corp., dba, solar and Energy Storage Association of Puerto Rico, opposed this request on August 25, 2025, and LUMA reiterated its request on September 18, 2025.

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 during September 2025 in relation to the PSP. 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

As previously set out, the air pre-heaters installation is scheduled for completion during March 2026.

Short-term Generation Repairs: San Juan Unit 6

The San Juan Unit 6 consists of two parts, a steam turbine and a gas turbine. The gas turbine continues in use with an output of 160MW. The installation of the steam turbine rotor is still scheduled for December 2025.

Short-term Generation Repairs Costa Sur 5

Unit is in service.

Short-term Generation Repairs: Palo Seco Unit 4

The unit returned to service in September 2025 with a maximum load of 175 MW. A fuel mix characterization will be performed during November in preparation to increase the load to 200 MW.

Deployment of 430 MW of Utility Scale BESS

Project Milestone - Important Dates:

Cambalache

- The Notice to Proceed for BESS installations was issued to RG Engineering (Contractor) on August 12, 2025.
- The Contractor has mobilized and started installing mesh for erosion control as part of the *Permiso Único Incidental* (PUI) requirements.
- Construction coordination meetings are held every Tuesday at 8:30 AM.
- The PUI package from the Contractor is still pending submission for review.
- The National Pollutant Discharge Elimination System (NPDES) Notice of Intent was submitted on September 16, 2025.

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- The Interconnection Impact Study was updated to reflect a change in Commercial Operation Date (COD) and completed on August 20, 2025.
- The Interconnection Facility Study was received on September 24, 2025.
- The long lead items list was received from LUMA on September 15, 2025.
- Coordination with LT Automation LLC, regarding the installation of an IT/OT room has been discussed, and the parties are in agreement.
- Integra's structural study of the bridge located at the plant entrance was received on September 19, 2025.

Vega Baja Plant

- The Notice to Proceed was issued to Contractor on September 8, 2025.
- The Contractor is expected to mobilize during the last week of October 2025.
- Construction coordination meetings are held every Tuesday at 1:00 PM.
- The PUI package from Contractor is pending submission for review.
- A second PUI package submission will be required for Phase 2.
- The Interconnection Impact Study was received from LUMA on August 20, 2025.
- The long lead items list was received from LUMA on September 15, 2025.
- All Contractors & Builders and Beta Electrics companies will handle relocation of the existing MPT, scheduled for October 15, 2025.

Palo Seco Plant

- LT Automation, LLC. will install the IT/OT Communication Room and Monopole in an area that will not impact on the BESS project installation.
- Jaca & Sierra will perform boring tests near Units 1 & 2.
- The surveyor and GPR tasks will be led by the assigned team lead.
- An RFP issuance is planned for demolition of an existing warehouse to enable the battery packs installation.

Costa Sur

- The civil and structural works contract is still pending approval from FOMB.
- Construction coordination meetings with Contractor are held every Thursday at 8:30 AM.
- The Interconnection Impact Study was received from LUMA on August 20, 2025.
- The long lead items list was received from LUMA on September 15, 2025.

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- LT Automation finalized the location of the IT/OT Communication Room and Monopole.
- Issuance of a Notice to Proceed to Contractor is scheduled for October 2025.

Aguirre

- The civil and structural works contract was approved by FOMB on September 23, 2025, and by P3A on October 2, 2025.
- Construction coordination meetings are held every Thursday at 11:00 AM.
- The Interconnection Impact Study was received from LUMA on August 20, 2025.
- The long lead items list was received from LUMA on September 15, 2025
- Issuance of a Notice to Proceed to Contractor is scheduled for October 2025.

Yabucoa

- The civil and structural works contract was submitted for approval to P3A and FOMB on September 19, 2025, and is still pending .
- Construction coordination meetings with Contractor are held every Thursday at 2:00 PM.
- The Interconnection Impact Study was received from LUMA on August 20, 2025.
- The long lead items list was received from LUMA on September 15, 2025.
- Issuance of a Notice to Proceed to Contractor is scheduled for October 2025.

LUMA Interconnection Studies

- Interconnection Impact Studies for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa received from LUMA on August 20, 2025.
- Interconnection Facilities Studies for Vega Baja, Costa Sur, Aguirre, and Yabucoa are expected to be completed and delivered by October 20.
- A prior Impact Study for Cambalache had been received on April 7, 2025. Due to the COD change, an updated Impact Study was issued on August 20, 2025, and the Facility Study was received on September 24, 2025.
- The long lead items list was received from LUMA on September 15, 2025, for all sites.
- The Roles and Responsibilities documentation remains under negotiation.
- Coordination meetings with LUMA are held every Wednesday at 2:00 PM.

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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 October 2025.

On September 19, 2025, Genera submitted an updated Unit Retirement Evaluation Checklist letter to LUMA. The submittal reflects the current decommissioning plan for the Legacy Generation Assets at Costa Sur, Jobos, Yabucoa, and Daguao. The plan outlines that new Peaker units at Costa Sur are scheduled for commercial operation by October 2027; demolition at Jobos is expected to begin in September 2026 with a COD in December 2027; demolition at Yabucoa is scheduled for September 2026 with a COD in January 2028; and demolition at Daguao is also scheduled for September 2026, with a COD in February 2028. Approval of this checklist is necessary to maintain these timelines.

Genera are preparing the documentation to issue a Request for Proposals (RFP) for the EPC contract covering the Peaker sites of Jobos, Yabucoa, and Daguao. The RFP is planned for issuance by November 2025, with contract approval anticipated from P3A and FOMB by May 2026.

At the program level, the FEMA Environmental and Historic Preservation (EHP) review is ongoing, with updated emissions data submitted. Genera remain aligned with the project timeline and continues to proactively address external risks and regulatory requirements.

Progress Overview by Site

Costa Sur

- Following the Notice of Intent to Award for RFP #231161 to Homeca Recycling, Genera completed the review of all documentation and will meet with Homeca to address final clarifications and close pending items prior to starting demolition activities scheduled for November 2025.
- Genera is awaiting confirmation of the estimated target dates for completion of the impact and facility studies by LUMA.
- Genera's Legal division is finalizing a contract amendment with Siemens under Change Order #2, which includes a cost-reduction credit of \$226,241.00. The modification affects the balance of plant equipment to be supplied by Siemens, and both parties aligned on its implementation approach.
- The second payment milestone to Siemens, totaling \$38,064,294.28, was completed on September 19, 2025.
- Genera is working on an RFP for civil and structural works at the Costa Sur site, estimated to be published in October 2025.

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Jobos, Yabucoa, and Dagua

- Regarding the land transfer package, Genera is currently awaiting LUMA's response or comments upon their review, with a target date of October 2025.
- The interconnection packages for these sites were submitted to LUMA in September 2025, and Genera is awaiting confirmation of the estimated target dates for completion of the impact and facility studies.
- Manufacturing of the Peaker units is ongoing. Supplier RGE/GE completed the Factory Acceptance Test (FAT) for the balancing turbine rotors in September 2025, covering 50% of the units.
- Genera are preparing documentation to issue an RFP for the EPC contract covering these three sites. Proceeding under an EPC structure provides opportunities for schedule optimization and may allow advancement of the COD targets for Jobos, Yabucoa, and Dagua.

Unforeseen Circumstances:

- As notified by FEMA on August 8, 2025, FEMA EHP has referred the Peaker installation project to a Higher 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 unit's commissioning plan and requested all MW capacity substitutions and an operational reserve of 810MW to concur with the units decommissioning request. Genera is expecting for the 800MW emergency generation project to be implemented but is still pending procurement by 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 the Environmental Protection Agency (EPA) in November 2024 for the Yabucoa, Dagua, and Jobos sites. An amendment was submitted to 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.

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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
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

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Aguirre CC 2-3	Generator breaker 13 kV	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 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	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	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	1	225916	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	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 13 kV	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 a temperatures	1	4523/22 0444	Cancel	
Palo Seco	Palo Seco 3&4	Reduction in station a temperatures	1	4523/22 0444	Cancel	
Palo Seco	Palo Seco 3&4	Turning Gear Assembly	1	No competitive	Cancel	
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	
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	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
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	
Palo Seco	Palo Seco 3&4	Set of open and close hardware - honeycomb seals, etc.	1	219624	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	
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	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
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	
Aguirre	Aguirre CC 2-3	Switch gears 4 kV	1	221853	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Switch gears 4 kV	1	221853	Panel Evaluation	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp	3	221150	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp	3	221150	Pending Award	
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	Pending Award	
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	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Pending Award	
Mayagüez	Mayagüez	Clutch removal kit	5	292339	Pending Award	
Aguirre	Aguirre 2	Feedwater Heaters 3 *LP Horizontal	2	221016	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 1750HP,	2	221150	Pending Award	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
		4000v/580amp *4500HP				
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 1750HP, 4000v/580amp *4500HP	2	221150	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 1750HP, 4000v/580amp *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 1750HP, 4000v/580amp *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Pending Award	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Pending Award	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Pending Award	

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Power Plant	Unit	Description	Qty per unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3	Water heater 5 *HP Vertical	1	221016	Pending Award	
San Juan	San Juan 9	Recirculating fan duct and GRF	1		PMO	
Cambalache	Cambalache	Feedwater pump and motor	1	220919	Procurement	

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. The last request for information was sent on October 7, 2025, and the 3PPO submitted its responses on October 13, 2025. On October 10, 2025, the Energy Bureau issued a Resolution and Order requesting a detailed progress report on the ongoing emergency generation acquisition process. In compliance with that directive, the Resolution and Order was notified to the 3PPO, and PREPA requested from the 3PPO all the information required by the Energy Bureau. On October 15, 2025, the 3PPO submitted the information and documentation requested by the Energy Bureau, and PREPA filed a compliance motion to submit the same before the Energy Bureau. After a thorough review of the responses to the RFI sent by PREPA on October 7, 2025, PREPA understands that additional explanations are required. Therefore, PREPA will send a letter to 3PPO to request such explanations.

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

October 27, 2025



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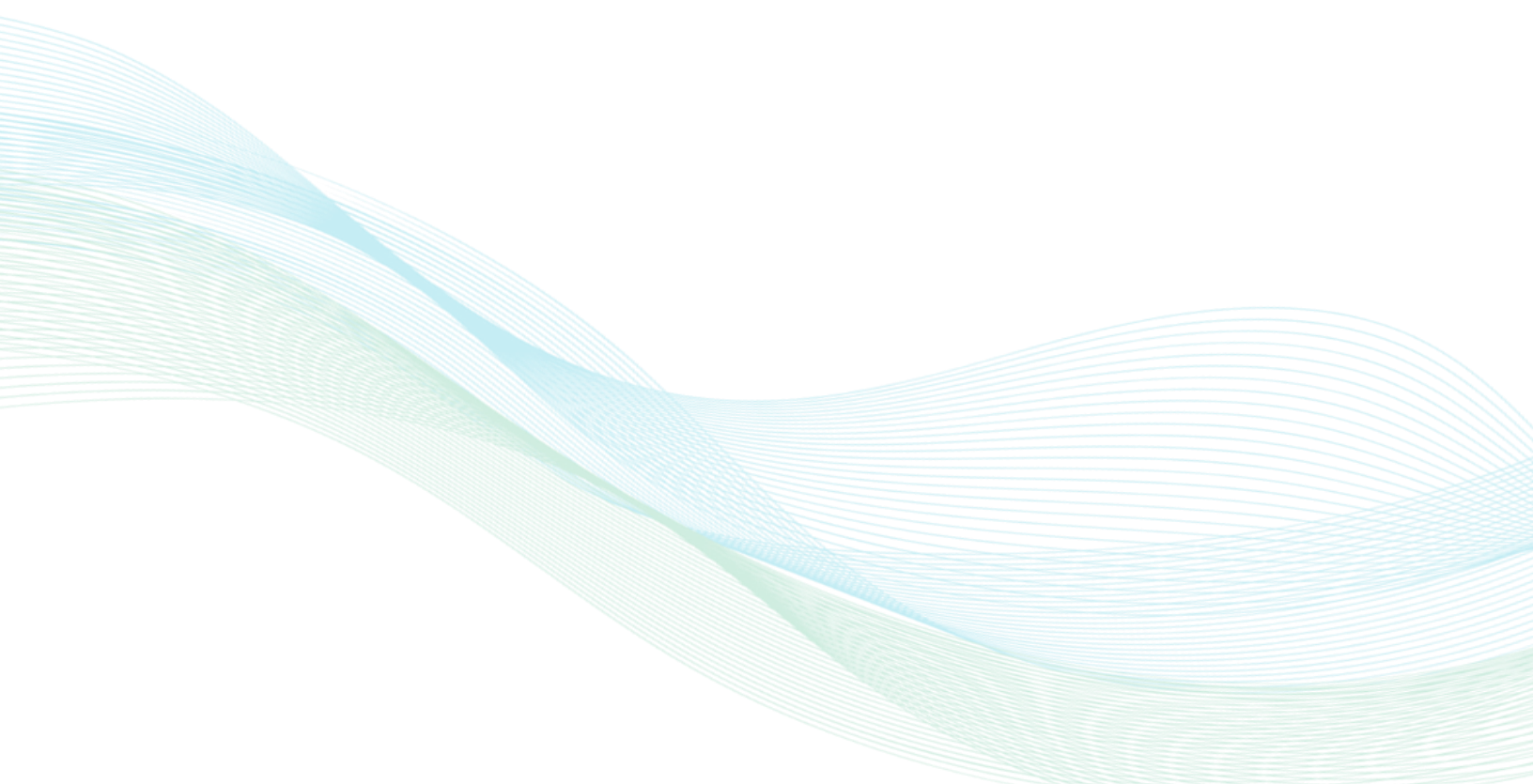
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1.0 Introduction

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 review of 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. Review Completed and Presented to the Puerto Rico Electric Power Authority (PREPA) – October 2025
2. Completion of Review by PREPA and the Central Office for Recovery, Reconstruction and Resilience (COR3) – October 2025
3. Integration of Comments and Final Internal Review (including PREB, PREPA, and COR3 feedback) – November 2025
4. 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

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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

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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 will submit the hazard mitigation narrative 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(Inactive)
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972 (Inactive)
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502 (Inactive)
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503 (Inactive)

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