

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

NEPR

Received:

Nov 10, 2025

4:18 PM

IN RE:

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

CASE NO.: NEPR-MI-2021-0002

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

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

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

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

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

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

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

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

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

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

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of November 2025.

(Signatures appear on the following page.)

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

ECIJA SBGB

PO Box 363068

San Juan, Puerto Rico 00920

Tel. (787) 300.3200

Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo

Jorge Fernández-Reboredo

jfr@sbgblaw.com

TSPR 9,669

/s/ José Javier Díaz Alonso

José Javier Díaz Alonso

jdiaz@sbgblaw.com

TSPR 21,718

CERTIFICATE OF SERVICE

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

In San Juan, Puerto Rico, this 10th day of November 2025.

/s/ Jorge Fernández-Reboredo

Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso

José Javier Díaz Alonso

Exhibit A
Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

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

BESS Monthly Report

Cambalache RFP Project Milestone – Important Dates:

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

- A groundbreaking event for the Battery Energy Storage Systems (BESS) installation works was held on October 23, 2025, with the selected proponent RG Engineering (Contractor) and the participation of government stakeholders.
- RG Engineering has mobilized the site and started demolition of the Cambalache warehouse on October 23, 2025. The demolition was completed on October 31, 2025. The next scheduled activity is site grading (cut and fill).
- The Contractor has 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 NPDES Notice of Intent (NOI) (NPDES ID 02R10I00Z) and Storm Water Pollution Prevention Plan (SWPPP) were submitted by Contractor on September 18, 2025.
- The PUI permit (No. 2025-652964-PUI-301906) was provided by Contractor on October 30, 2025.

Vega Baja Plant

- The Notice to Proceed was issued to the Contractor on September 8, 2025.
- The Contractor mobilized to the site during the first week of October 2025 and began demolition of the concrete pad.
- Construction coordination meetings are held every Tuesday at 1:00 PM.
- The PUI package from the Contractor is pending submission for review.
- Beta Electric has installed a temporary dike as part of the existing GSU relocation, and together with All Contractors & Builders, will perform the relocation at the beginning of November 2025, in coordination with the ongoing GSU works and upcoming repairs.
- Temporary relocation of the fiber line is required; coordination is in process with LUMA. In addition, we are currently awaiting a quote for the relocation work, and a site visit is being coordinated to facilitate obtaining this quote.

Palo Seco Plant

- Stantec will serve as the A&E company for the planned RFP associated with the BESS project. The RFP issuance is planned for the demolition of an existing warehouse to enable the battery packs installation.

Costa Sur

- The civil and structural works contract was approved by FOMB on October 6, 2025, and is scheduled to be signed with the selected proponent in November 2025.
- Construction coordination meetings with Contractor are held every Thursday at 8:30 AM.

- Issuance of a Notice to Proceed to Contractor is scheduled for November 2025.

Aguirre

- The civil and structural works contract was approved by FOMB on September 23, 2025, and by P3A on October 2, 2025, and is scheduled to be signed with the selected proponent in November 2025.
- Issuance of a Notice to Proceed to Contractor is scheduled for November 2025.

Yabucoa

- The civil and structural works contract was approved by P3A on October 28, 2025, and by FOMB on October 30, 2025, and is scheduled to be signed with the selected proponent in November 2025.
- Construction coordination meetings with Contractor are held every Thursday at 2:00 PM.
- Issuance of a Notice to Proceed to Contractor is scheduled for November 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 are now expected to be delivered as follows: Vega Baja and Aguirre on November 14, 2025, and Costa Sur and Yabucoa on November 21, 2025.
- 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 and is expected to be resolved and finalized in November 2025.
- Upon receiving the remaining Facility Studies, Genera will begin preparing the RFP for switchyard upgrades.
- Coordination meetings with LUMA are held every Wednesday at 2:00 PM.

Permits

- The PUI permit for Vega Baja is pending submission by the contractor.
- The PUI permit (2025-652964-PUI-301906) for Cambalache was issued on October 27, 2025.
- The EPA Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) for Cambalache were submitted by the Contractor on September 18, 2025, and subsequently approved.
- The Fire Department Endorsement for all sites is in process. Genera received four responses for the preparation of the Hazard Mitigation Plan and Emergency Response Plan; these are currently under review.

Procurement

- A biweekly coordination meeting with LUMA and Tesla is held every Wednesday at 10:00 AM to review Minimum Technical Requirements (MTR) compliance.
- RFP 5040 is currently active and seeks qualified and experienced contractors to perform the installation of 234 MW of BESS across three sites: Costa Sur, Yabucoa, and Aguirre. The proposal submission deadline has been extended to December 5, 2025. A site visit with the participating proponents was conducted from October 8 to October 9, 2025.
- Another RFP is in development phase for LUMA's interconnection Facility Studies related to switchyard upgrades.