

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

**NEPR**

**Received:**

**Nov 26, 2025**

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**IN RE:**

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

**CASE NO. NEPR-MI-2021-0002**

**SUBJECT: Informative Motion on the Status of  
SOW: 4 x 25 MW BESS Interconnections at  
LUMA 38kV System (November 2025)**

**INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS  
INTERCONNECTIONS AT LUMA 38KV SYSTEM (NOVEMBER 2025)**

**TO THE PUERTO RICO ENERGY BUREAU:**

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

**I. Relevant Procedural Background**

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

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law* (“August 25<sup>th</sup> Motion”). Therein, LUMA submitted the scope of work (“SOW”) for the “4 x 25 MW BESS Interconnections at LUMA 38kV System” transmission and distribution project (“4 x 25 MW BESS T&D Project”), for the Energy Bureau’s review and approval before submitting it to COR3 and FEMA.

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order (“August 30<sup>th</sup> Order”) in which it approved the 4 x 25 MW BESS Project SOW, determining that this project was necessary to improve the system’s reliability.

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order (“January 3<sup>rd</sup> Order”) in which it ordered LUMA “to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the [4 x 25 MW BESS Project].” *See* January 3<sup>rd</sup> Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System* to comply with the January 3<sup>rd</sup> Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the 4 x 25 MW BESS Project until its June 2025 completion date (“January 14<sup>th</sup> Order”). *See* January 14<sup>th</sup> Order, p. 2. The Energy Bureau directed that the status report include:

- i) The locations of the twenty (20) sites studied;
- ii) The final four selected sites;
- iii) The cost to complete the studies of the twenty sites.
- iv) Indicate the funds utilized to pay for these studies and the amount spent to date.
- v) The reimbursement status of these funds, or if they were advanced by FEMA
- vi) The [Detailed SOW (“DSOW”)] presented to FEMA and COR3;
- vii) The ROI and LUMA responses to such ROI requested by FEMA and COR3;

- viii) The FAASSt number for the project; and
- ix) An updated cost estimate based on the DSOW.

*See Id.*

7. In compliance with the January 14<sup>th</sup> Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this Motion.

**RESPECTFULLY SUBMITTED.**

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to PREPA via Alexis Rivera, [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov), and through its counsel of record, Natalia Zayas Godoy, [nzayas@gmlex.net](mailto:nzayas@gmlex.net), Richard Cruz Franqui, [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net), and Mirelis Valle Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net), to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, [jfr@sbgblaw.com](mailto:jfr@sbgblaw.com), José J. Díaz Alonso, [jdiaz@sbgblaw.com](mailto:jdiaz@sbgblaw.com), and Francisco Santos, [francisco-santos@genera-pr.com](mailto:francisco-santos@genera-pr.com).

In San Juan, Puerto Rico, on the 26<sup>th</sup> day of November 2025.



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Exhibit 1

*4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report  
(November 2025)*

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

November 26, 2025



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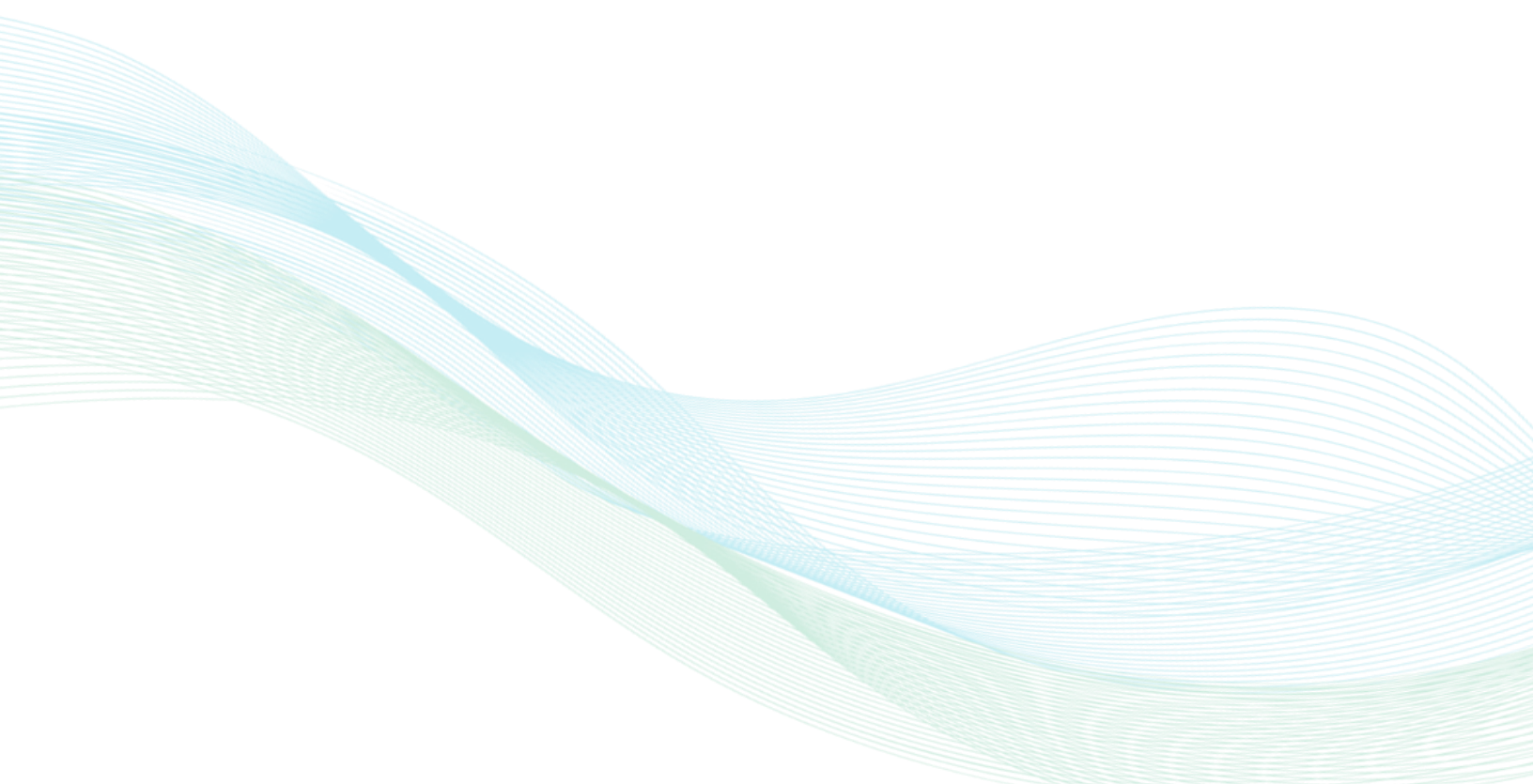
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## 1.0 Introduction

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 30<sup>th</sup> 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 and presented it to all key stakeholders to support the Section 406 Hazard Mitigation (HM) proposal.

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 (Complete)
2. Document Final Review on going by PREPA and The Central Office for Recovery, Reconstruction and Resilience (COR3)
  - November 2025 / In Progress
3. Integration of Comments and Final Internal Review (including PREB, PREPA, and COR3 feedback)
  - November 2025 November 2025 (Pending final input from PREPA and COR3)
4. Submission of FEMA 406 Hazard Mitigation Justification
  - December 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 FAASt List.

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## 2.2 Procurement

Since the BESS projects have been placed as “Process Discontinued”, the procurement process is on hold until the projects are included in the Consolidated Project FAASt 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.

## 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               |

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| Milestone                  | Estimated Duration | Projected Completion |
|----------------------------|--------------------|----------------------|
| 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 are the reimbursements received prior to that.

**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 presented the document to PREPA and COR3 by November 2025 for their review before submitting it to FEMA. The response to FEMA's soft RFI is expected to be submitted in December 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.

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**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               |