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

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN – DECEMBER 2020	**CASE NO.**: NEPR-MI- 2021-0002

MOTION TO SUBMIT PREPA'S DECEMBER 2025 UPDATE TO THE PREPA-LUMA 90-DAY PLAN

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its counsel of record, and respectfully submits and prays as follows:

1. On March 26, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") entered a Resolution and Order (the "March 26 Order") requiring PREPA to, among other things, "continue reporting to the Energy Bureau and FEMA, within the next five (5) years, the progress of all ongoing efforts related to the final approval of the submitted projects not yet approved by the Energy Bureau".

2. On July 15, 2021, LUMA Energy, LLC and LUMA ServCo, LLC ("LUMA") submitted before this Energy Bureau a document titled *Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed during the Technical Conference* ("July 15th Motion") wherein LUMA proposed, among others, that reporting in this docket be done quarterly and that updates to the 90-Day Plan in relation to the 10-Year Infrastructure Plan be provided to the Energy Bureau during

the last month of every quarter as it is provided to FEMA. See the July 15 Motion on pages 8-9.

3. On September 21, 2021, PREPA and LUMA filed a joint motion titled Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan ("September 21 Motion"). In the September 21 Motion, LUMA and PREPA stated that in the future, they would continue to file the PREPA-LUMA 90-Day Plans instead of 90-Day updates of the 10-Year Infrastructure Plan, given that FEMA was only required to file the 90-Day Plans. See the September 21 Motion on page 4.

4. PREPA hereby submits, as Exhibit I to this Motion, the December 2025 update to the *PREPA-LUMA 90-Day Plan*, including information on areas of coordination among PREPA, LUMA, and Genera PR LLC, focus areas specific to each, and an overview of key next steps for the upcoming 90 days in relation to the 10-Year Infrastructure Plan.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take notice of the above and accept the December 2025 PREPA-LUMA 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 11th day of December 2025.

CERTIFICATE OF SERVICE: It is hereby certified that I have filed the foregoing with the Clerk of the Energy Bureau using the electronic filing system using https://radicacion.energia.pr.gov/login and also, that I have notified a copy by electronic mail to LUMA Energy, LLC and LUMA Energy ServCo, LLC through their counsels of record at Yahaira.delarosa@us.dlapiper.com; to Genera PR, LLC

through their counsels of record at jrf@sbgblaw.com, jdiaz@sbgblaw.com, and francisco-santos@genera-pr.com; and to PREPA through alexis.rivera@prepa.pr.gov.

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Exhibit I

FEMA

CENTRAL OFFICE FOR RECOVERY, RECONSTRUCTION AND RESILIENCY

COR3

GOVERNMENT OF PUERTO RICO

PREPA-LUMA-GeneraPR 90-Day Plan

December 2025

LUMA

Puerto Rico Electric Power Authority

GeneraPR

FEMA

CENTRAL OFFICE FOR RECOVERY, RECONSTRUCTION AND RESILIENCY

COR3

GOVERNMENT OF PUERTO RICO

PREPA 90-Day Plan

December 2025

Puerto Rico Electric Power Authority

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I. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for Puerto Rico Electric Power Authority's (PREPA) Transmission and Distribution (T&D) System as outlined within the Operations and Maintenance Agreement (OMA) between PREPA, Puerto Rico Public-Private Partnership Authority (P3A), and LUMA. Upon execution, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and become the responsibility of LUMA.

On July 1, 2023, GeneraPR assumed overall responsibilities for PREPA's Generation System as outlined within the OMA between PREPA, P3A, and Genera. Upon execution, PREPA refocused its efforts on projects in the Dams, Hydro, and Irrigation asset categories, while projects in the Legacy Generation Asset categories ("Generation Projects") were transitioned to and became the responsibility of GeneraPR.

This 90-Day Plan provides information on areas of coordination among PREPA, LUMA, and Genera, as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90-Days

The content below summarizes the next steps across the following four areas: 1) Federal Grant Management; 2) Environmental and Historic Preservation (EHP); 3) Engineering Management; and 4) Enterprise Project Management (EPM).

Federal Grant Management

PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3 and FEMA for compliance with EHP requirements.
    - PREPA is working alongside FEMA and COR3 to organize approved detailed SOWs into logical groupings for Project Formulation submissions (*Detailed SOWs*).
    - The logical grouping of the SOWs considers EHP limitations in evaluating all environmental impacts under one area.
    - PREPA continues to revise *Detailed SOWs* in accordance with FEMA

406-Mitigation and EHP feedback and comments.

- As of August 31, 2025, the end of the last quarter, five (5) projects remain in the applicant resubmission queue and are awaiting additional information from project designers to advance to the next stage:
    - Two projects will remain in the resubmission queue until design information becomes available:
        - Guayabal Dam Repair and Mitigation Project (awaiting Task Order approval and designs), and
        - Guajataca Dam (not projected to be advanced for at least two years),
    - Based on the comments received by FEMA EHP, additional studies are required prior to resubmission of the following projects, and PREPA is in the process of acquiring contractors to perform these studies including surveys and geotechnical investigations:
        - Toro Negro Hydroelectric System,
        - Rio Blanco Hydroelectric System, and
        - Caonillas Hydroelectric Plant No. 1

- In addition to the previously listed projects, PREPA anticipates the resubmission of multiple dredging projects. These submissions will incorporate the relevant EHP information. The priorities have been established, as listed below, based on the complexity of the project, information available, and cost. Of the projects noted, PREPA anticipates four (4) Dredging Projects DSOWs to be submitted next quarter (TBSNQ). PREPA will submit the final TBSNQs DSOWs based on completion level from USACE.
    - FEMA has determined that 30% design must be included in the DSOW submissions. Although 30% design has been received for most of these projects, the 30% design review process is in progress for those remaining.
        - 30% design completion or near completion status for the projects is:
            - Dos Bocas Reservoir Dredging (submitted Dec 2025)
            - Caonillas Reservoir Dredging (to be submitted Dec 2025)
            - Guajataca Reservoir Dredging (TBSNQ)
            - Garzas Reservoir Dredging (TBSNQ)
            - Loco Reservoir Dredging (TBSNQ)
            - Guayo Reservoir Dredging
            - Lucchetti Reservoir Dredging
            - Guerrero Reservoir Dredging (TBSNQ)

  - Due to delays associated with the initiation of the geotechnical program for the Irrigation Canal, PREPA anticipates a final DSOW submission for one additional segment of the two FEMA FAASt Irrigation Canal Projects for next quarter:
    - Guamani Canal – South Coast Irrigation District (to be submitted Dec 2025)
    - Patills Canal – South Coast Irrigation District (TBSNQ)

- PREPA will work with FEMA to respond promptly to any outstanding RFIs.
  - This quarter PREPA has responded to RFIs for one project:
    - Dos Bocas Reservoir Dredging.
    - Three RFIs remain pending:
      - Toro Negro Hydroelectric Conveyance System
      - Caonillas Hydroelectric Plant No. 1
      - Dams Minor Repairs (response by Dec 2025)

- Pursuant to communications with FEMA, PREPA will be evaluating and proposing hazard mitigation proposals within the next quarter for the following:
  - Dredging Program (11 projects)
  - Guajataca Dam

- Patillas Dam Seismic Retrofit project status, which includes 404 Mitigation Funding for Phase I (design), and Puerto Rico Department of Housing (PRDOH, or Vivienda) Community Development Block Grant Mitigation (CDBG-MIT) program funds for Phase II (construction):
  - PREPA is awaiting FEMA's response to their Period of Performance Time Extension (POP TE) and Budget Reallocation Request, which was submitted in the second quarter of 2025.
  - On-going bi-weekly coordination meetings are held with the US Bureau of Reclamation (USBR), the project design team, to facilitate progress. USBR submitted the 30% design schedule and budget information in the second quarter of 2025; 30% design documents were submitted first quarter of 2025.
  - On-going monthly meetings are held with the PRDOH to provide project status updates and coordinate with documentation necessary for the environmental review process.

- PREPA will submit progress and financial quarterly reports for the period ending 6/30/2025 on all 428 and 404-obligated projects.

Environmental and Historic Preservation

PREPA Focus Areas

- Complete EHP checklist and documentation requirements for all PREPA projects based on information received by project designers.

- Respond to any EHP RFIs. Three current EHP RFIs are pending response from PREPA, including:
  - Toro Negro Hydroelectric System – pending additional studies
  - Caonillas Hydroelectric Plant No. 1 – pending additional studies
  - Dams Minor Repairs

- Alongside our FEMA partners, PREPA anticipates the initiation of the formal EHP reviews (NEPA process) for the following projects:
  - Dos Bocas & Caonillas Dredging (per FEMA joint review)
  - Guajataca & Guerrero Dredging (per FEMA joint review)
  - Garzas Dredging

- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
  - A draft EA was provided to PRODH/Vivienda as established by the HUD & FEMA Joint Environmental Process Workflow. Vivienda identified additional studies required prior to initiation of the environmental review process. PREPA is coordinating efforts to fulfill those requests.

- In conjunction with the DSOW submission, PREPA is establishing meetings with FEMA EHP to discuss the environmental review process for the dredging program, which considers the removal of over 4 million cubic yards of sediment from eleven reservoirs.

Engineering Management

PREPA Focus Areas

- Due to the complexity of the water assets projects, PREPA requested technical assistance from USACE under an umbrella Memorandum of Agreement (MOA) to provide support with design, project management, and construction management (as needed). MOA Task Order 2 for USACE to provide technical assistance was signed and approved the previous quarter.
  - In accordance with Task Order 2, PREPA has issued eleven task requests for technical support to evaluate designs and provide assistance the PREPA Project Management Office (PMO) in managing projects
  - In addition to the projects listed last quarter, Task Requests have been issued to USACE to review the 30% design documents received on

the following projects:

- Guineo Dredging Design Review; revised Task 012 issued December 1, 2025
- Guerrero Dredging Design Review; revised Task 013 issued December 1, 2025
- Matrullas Dredging Design Review; Task 014 issued August 7, 2025.

  - Additionally, in anticipation of programmatic schedules, PREPA is working with USACE to submit a programmatic scheduling plan. Technical Assistance will be needed by Federal Partners. This work falls under Task 002 and should provide the details requested in FEMA's Consolidated Project Plan List Final Submittal Request submitted September 4, 2025.

- Dredging Projects:
  - Two architectural and engineering (A/E) design firms were selected for the dredging projects: CSA and AECOM.
  - Planning Phase technical reports were prepared and submitted by the designers to PREPA detailing the project overviews, considerations, and projected alternatives for nine of eleven dredging projects.
  - As of fourth quarter of 2025, 30% design documents were received for the following dredging projects:
    - Caonillas Reservoir Dredging
    - Guajataca Reservoir Dredging
    - Garzas Reservoir Dredging
    - Guerrero Reservoir Dredging
    - Loco Reservoir Dredging
    - Lucchetti Reservoir Dredging
    - Guayo Reservoir Dredging
    - Guayabal Reservoir Dredging
    - Dos Bocas Reservoir Dredging
    - Matrullas Reservoir Dredging (Q4)
    - Guineo Reservoir Dredging (Q4)

- Guajataca Dam Project: given the scope and complexity of the project, specialized skillsets are required, and PREPA management has finalized the evaluation of the contract structure to receive such services from USACE. Technical studies and project design are currently under development.
  - USACE is conducting their alternatives analysis for proposed solutions.

- PREPA continues to advance designs for the Irrigation Canal Systems. Based on the size of the South Coast Irrigation District, the designers will submit 30% design information for this project by segment. Due to delays associated with the approval of geotechnical investigations the project schedules have been adjusted.
    - 100% Designs were received the end of the fourth quarter of 2025 for Guamani Main Canal, which comprises the South Coast Irrigation District.
    - 100% Designs are anticipated the first fourth quarter of 2026 for Patillas Main Canal, which comprises the South Coast Irrigation District.

- Early Warning System (404 Mitigation Funding)
    - Final design for the project is ongoing (design-build).
    - A project amendment is being processed by FEMA to incorporate last mile connectivity of the site specific EWS systems to Emergency Operation Command Centers.

- IT/OT Telecoms project is ongoing (design-build).
    - Control Rooms construction is in progress. Equipment purchases are in progress.

- Bonus project is ongoing (design-build).
    - Security perimeter fences, including approved mitigation measures, currently under construction. Procurement process for other site repairs currently in process.

Enterprise Project Management ("EPM")

PREPA Focus Areas

- Continuing to manage project schedules, tasks, budgets, and progress in PREPA's system of recording, MS Project Online.

- PREPA will rely on USACE for a master schedule of the projects associated with Task Order 2, which was issued for the creation and management of a program master projects schedule.

- Continuing to refine project management controls and artifacts aligned with federal requirements.

- Continuing integration of federally funded projects into PREPA's EPM program to allow for project management across the entire portfolio, including non-federally funded projects.

- Refine MS Power BI reporting dashboards and develop standard reporting at the portfolio level.

- Monitor and manage implementation progress through the EPM program.

III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Water Asset projects *Detailed SOWs*. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the fourth quarter of 2025.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.

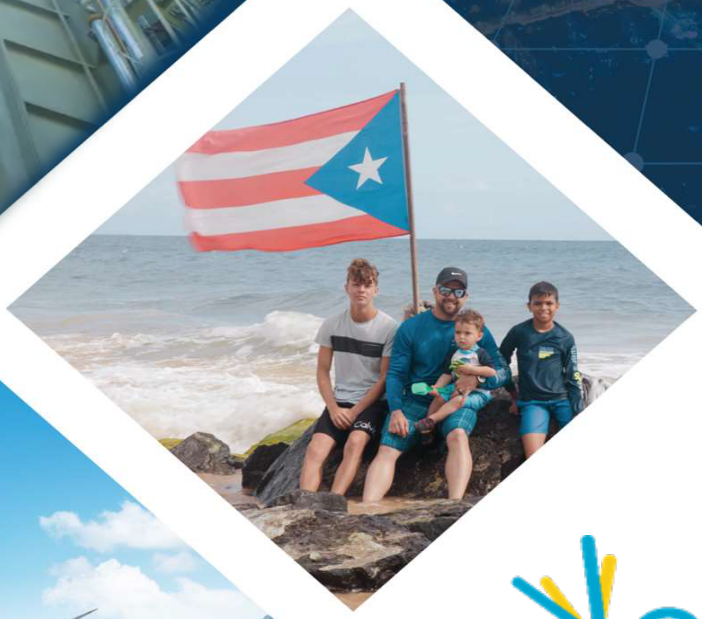
Table 1.1 – PREPA 2026 Q1 Project Submittal Milestone

Project Details						*Project Progress*					
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Design Stage Description	Commencement Date	Anticipated Date of Design Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
1	180723	FAASt - Rio Blanco Hydroelectric System (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information including surveys and Geotech	May-26	Planning & Design	30% Designs	Jul-21	Sep-26	30%	TBD
2	436468	FAASt - Toro Negro Hydroelectric Conveyance Canal and Penstock Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information including surveys and Geotech	May-26	Planning & Design	30% Designs	Jul-21	Sep-26	35%	TBD
3	334770	FAASt - Guajataca Dam - Permanent Repairs (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Preliminary Studies Soil Investigations Underway	Dec-25	Planning & Design	Preliminary Studies	Jan-24	Dec-28	11%	TBD
4	436621	FAASt - Dams Minor Repairs	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted EHP RFI Response Submission Pending	Dec-25	Planning & Design	30% Designs	Feb-24	Jul-26	30%	Sep-27
5	721184	Guayabal Dam Seismic Retrofit	Dams, Irrigation Channels & Reservoirs	PREPA coordinating amongst Federal Design Groups	Dec-30	Planning & Design	Preliminary Studies	Dec-27	Dec-30	10%	TBD
6	728260	FAASt - Caonillas 1 Hydro System (Hydro)	Dams, Irrigation Channels & Reservoirs	Draft DSOW Submitted Pending Follow Up Design Information Note project necessary to inspect damages to components in the hydroplant	Aug-26	Planning & Design	30% Designs	Feb-24	Mar-27	30%	Dec-27
7	435769	FAASt - South Coast Irrigation District - Canals (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Geotechnical investigations ongoing towards final 30% Design Completion - Designs to be provided in segments (DSOW submission to occur in batches)	May-26	Planning & Design	30% Designs	Jul-22	May-26	50%	TBD
8	436467	FAASt - Isabela Irrigation District - Canals (Water Assets - Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Geotechnical investigations to commence towards final 30% Design Completion	TBD	Planning & Design	TBD	Jul-22	TBD	TBD	TBD
9	436462	FAASt - Lajas Irrigation District - Canals (Conveyance and Canals)	Dams, Irrigation Channels & Reservoirs	Geotechnical investigations to commence towards final 30% Design Completion	Jul-26	Planning & Design	30% Designs	Jul-22	Jul-26	25%	TBD
10	334811	FAASt - Dos Bocas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received and under final review	Dec-25	Planning & Design	60% Designs	Mar-24	Jul-27	36%	TBD

Project Details						*Project Progress*					
#	FEMA ID	Project Title	Asset	Project Formulation Status	Final DSOW Submission Date (Post-30% Design)	Stage	Design Stage Description	Commencement Date	Anticipated Date of Design Completion	Overall Percentage of Completion	Anticipated Construction Completion Date*
11	178722	FAASt - Caonillas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received and under final review	Dec-25	Planning & Design	60% Designs	Mar-24	May-27	31%	TBD
12	334772	FAASt - Guayabal Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 60% Designs	Jul-26	Planning & Design	60% Designs	Mar-24	Oct-27	31%	TBD
13	335206	FAASt - Matrullas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Apr-26	Planning & Design	30% Designs	Mar-24	Apr-27	30%	TBD
14	335207	FAASt - Guineo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Mar-26	Planning & Design	30% Designs	Mar-24	Feb-27	30%	TBD
15	334803	FAASt - Loco Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	60% Designs Received	Jan-26	Planning & Design	60% Designs	Mar-24	Dec-26	60%	TBD
16	334813	FAASt - Guayo Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 60% Designs	Jun-26	Planning & Design	60% Designs	Mar-24	Aug-27	40%	TBD
17	334773	FAASt - Lucchetti Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	Awaiting 60% Designs	May-26	Planning & Design	60% Designs	Mar-24	Jun-27	40%	TBD
18	334771	FAASt - Guajataca Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Dec-25	Planning & Design	60% Designs	Mar-24	Jun-28	31%	TBD
19	334798	FAASt - Guerrero Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Jan-26	Planning & Design	30% Designs	Mar-24	Feb-27	30%	TBD
20	334769	FAASt - Garzas Reservoir – Dredging (Dams, Hydro, & Irrigation)	Dams, Irrigation Channels & Reservoirs	30% Designs Received	Jan-25	Planning & Design	30% Designs	Mar-24	Jun-27	30%	TBD

*All project Construction Dates Assume a NEPA review process of no longer than 6 months. Project modifications pending USACE Task 1 from Task Order 2 (schedule), design dates may change as they have due to additional studies that may be required to proceed with DSOW submission

Project Progress					*Project Progress*			
#	FEMA ID	Project Title	Asset	Project Formulation Status	Stage	Commencement Date	Overall Percentage of Completion	Anticipated Construction Completion Date*
21	746897	BONUS	Dams, Irrigation Channels & Reservoirs	Obligated	Procurement/ Construction in Progress	Jun-25	30%	Apr-26
22	725535	FAASt - IT/OT System Upgrade for: Aguirre Power Plant, Aguirre Combined Cycle, Cambalache, Mayaguez, Costa Sur, San Juan and Palo Seco (Telecommunication)	Generation	Obligated	Planning & Design/Construction in progress	Nov-24	30%	Dec-26



FEMA

GeneraPR

90-Day Plan

DECEMBER 2025

CENTRAL OFFICE FOR RECOVERY, RECONSTRUCTION AND RESILIENCY
COR3
GOVERNMENT OF PUERTO RICO

Puerto Rico Electric Power Authority

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INTRODUCTION

This document outlines the progress and outlines the critical next steps for FEMA-funded projects related to Puerto Rico's electrical system, in accordance with FEMA's 90-Day Plan requirement for FAASt projects.

Under the terms of the T&D O&M Agreement, LUMA assumed responsibility for PREPA's transmission and distribution system ("T&D System") on June 1, 2021. Since then, LUMA has overseen all projects involving transmission, distribution, substations, IT/Telecom, buildings, and environmental asset categories were now LUMA's responsibility. PREPA in turn, retained responsibility for projects related to fossil-fueled generation, dams, hydroelectric, and irrigation asset categories.

On January 23, 2023, Genera entered into the LGA O&M Agreement to operate and PREPA's Legacy Generation Assets ("LGA") which include base-load generation plants and combustion turbine peaking units. As of July 1, 2023, Genera formally began acting as PREPA's agent for all pending and future generation projects related to the LGA. PREPA continues to manage projects related to hydroelectric generation, dams, and irrigation systems.

This 90-Day Plan highlights the coordination among PREPA, LUMA, and Genera, with a focus on Genera's areas and upcoming activities.

FOCUS AREAS FOR THE NEXT 90 DAYS

PREPA-LUMA-GENERA Coordination and Alignment

- PREPA, LUMA and Genera leadership continue to participate in regular weekly meetings with COR3 and FEMA to ensure project visibility, coordination and risk mitigation.

Federal Grant Management

In the next 90 days, Genera will focus on:

- Continuing work initiated by PREPA, focusing on rehabilitating, improving, and repairing various units within the LGA. These efforts aim to significantly enhance load generation capacity and reliability, ultimately aiming to reduce load-shedding events and improve service quality for our customers.
- Continue working with technical contractors, FEMA, and COR3 to organize approved SOWs into a logical grouping for Project Formulation submissions (DSOWs).
    - These groupings consider EHP limitations and facilitate the comprehensive evaluation of all environmental impacts within a single area.
    - Multiple DSOWs will be submitted (see the "Genera Submission of Detailed SOWs" section for details).
- Multiple ongoing RFPs for BESS, Critical Components, Fuel Efficiency and related to the LGA projects (see the "Engineering Management" section for details).
- Generation Fleet Project V0 BESS and V1 Peakers, units decommission process is ongoing; BESS installation RFPs are ongoing. Peakers contract with RGE for the GE Units has been executed, and the installation RFPs are under development.
- A request for ER1 cost-share funds for all LGA projects, including the newly obligated ones, has been submitted to Puerto Rico's Department of Housing, and the disbursements have begun.
- Submit progress and financial quarterly reports for all Section 428 and Section 404 projects to COR3

Environmental and Historic Preservation Coordination

In the next 90 days, Genera will focus on continuing the coordination during the weekly meetings currently being held between FEMA, COR3 and Genera with the EHP team to facilitate execution and compliance of all the projects in the pipeline.

Engineering Management

In the next 90 days, Genera will focus on:

- Soil preparation and mobilization activities at Cambalache for the BEES project in Arecibo have started.
- Ongoing decommissioning efforts at the existing units in Daguao, Jobos and Yabucoa.

These are the highlights of the RFPs that Genera currently has in progress or pending publication for the upcoming 90 days:

	PROCUREMENT PROCESS STAGE					
COMPONENT TYPE	PENDING PUBLICATION	EVALUATION	INTENT TO AWARD	AWARDED	CANCELLED	TOTAL
BESS	0	0	1	4	1	6
FUEL EFFICIENCY	17	0	0	1	0	18
POWER PLANT REPAIRS	24	0	0	0	0	24
CRITICAL COMPONENTS	3	3	12	19	3	40
LEGACY GENERATION PROJECTS	0	0	6	10	0	16
TOTAL	**44**	**3**	**19**	**34**	**4**	**104**

Enterprise Project Management ("EPM")

Over the next 90 days, Genera will focus on the following priorities:

- Continue evaluating the projects identified as necessary to improve the LGA, including repairs and enhancements to hazard mitigation measures.
- Continue managing project schedules, tasks, budgets, and progress in Genera's system of record.
- Continue refining project management controls and documents to ensure alignment with federal requirements.
- Monitor and oversee implementation progress through the EPM program.

GENERA SUBMISSION OF DETAILED SOWS

The following table provides the status of the Detailed SOWs (DSOW) Genera expects to PREB and FEMA. As they are identified, additional dates will be added in future updates.

Q4 GENERA PR 90-DAY PLAN

PROJECT NAME	PREB SUBMISSION	PREB Approval	COR3/FEMA Submission	COR3/FEMA Approval
164988 Generation Fleet Project - Control Room (San Juan & Costa Sur), Warehouse (Cambalache), Demolitions and Peakers/Blackstart installations -V1	Completed	Completed	Completed	Completed
817248 Power Plants Repairs and System Restoration - Critical Components installation- V0	Completed	Completed	Completed	Completed
673691 Equipment an Material V9- Cost Alignment- Generation Fleet (BESS, Peakers). SOW Change: Critical Components, V1 Transformers. New Project- Vieques & Culebra MicroGrid Generators	Completed	Completed	December	TBD
670036 Design Fire Pump Project	Completed	Completed	February	TBD
816612 Continuous Emission Monitoring Systems (CEMS)	Completed	Completed	Completed	Completed
948766- Physical Security	Completed	Completed	Completed	Pending
754801 Repair Unit 9 San Juan Steam Plant	Completed	Completed	Completed	Completed
Legacy Generation Assets (LGA) Projects- Cost Aligments (Multiple)	Not Required	Not Required	TBD	TBD

OBLIGATED PROJECTS CONSTRUCTION PROGRESS

Q4 GENERA PR 90- DAY PLAN

PW #	FEMA ID	Project Title	Percentage of Completion 2025 Q4	Percentage of Completion 2025 Q3	Change from Previous Quarter Plan
10571	669498	FAASt Aguirre Power Plant Infrastructure Projects 001	81%	81%	0%
10568	669233	FAASt Aguirre Power Plant 002 Units 1&2 Projects	98%	97%	1%
10622	669815	FAASt Aguirre Power Plant 003 Combined Cycle	82%	82%	0%
108019	754801	FAASt Repair Unit 9 San Juan Steam Plant	0%	0%	0%
108108	816612	FAASt Continuous Emission Monitoring Systems (CEMS) (Generation)	0%	0%	0%
108115	817248	FAASt Power Plant Repairs & System Restoration (Generation)	0%	0%	0%
10608	667744	FAASt San Juan Power Plant 004 - Auxiliary Infrastructure	100%	100%	0%
10607	663383	FAASt Cambalache Power Plant Permanent Repair	95%	95%	0%
10615	662947	FAASt San Juan 001– Units 5 & 6	88%	86%	2%
11085	687480	FAASt San Juan Plant 002 – Units 7 & 8	76%	61%	15%
10702	672950	FAASt Costa Sur Permanent Repairs	58%	58%	0%
10694	673006	FAASt Costa Sur 002 - Infrastructure projects	73%	71%	2%
10606	662957	FAASt Palo Seco Steam Plant Unit 3-4	83%	80%	3%
10609	671481	FAASt Palo Seco Steam Plant Permanent Repairs	86%	78%	8%
11855	164988	FAASt Generation Fleet Project	0%	0%	0%
108066	767305	FAASt Auxiliary Equipment	5%	0%	5%

PREPARATION FOR CLOSEOUT

PW #	FEMA ID	Project Title	% of Completion Q4 2025
10608	667744	FAASt San Juan Power Plant 004 - Auxiliary Infrastructure	100%

FEMA

OFICINA CENTRAL DE RECUPERACIÓN, RECONSTRUCCIÓN Y RESILIENCIA
COR3

90-Day Plan

December 8, 2025

LUMA

Table of Contents

I. Nomenclature

Acronym	Meaning
PREPA	Puerto Rico Electric Power Authority
T&D	Transmission and Distribution
OMA	Operations and Maintenance Agreement
P3A	Puerto Rico Public–Private Partnerships Authority
PREB	Puerto Rico Energy Bureau
COR3	Central Office for Recovery, Reconstruction and Resiliency
DSOW	Detailed Scope of Work
ISOW	Initial Scope of Work
FEMA	Federal Emergency Management Agency
PW	Project Worksheet
EHP	Environmental and Historic Preservation
MCW	Mostly Contracted Work
MSPW	Mostly Self-Performed Work
CW	Contracted Work
MSA	Master Services Agreement
DOE	U.S. Department of Energy
PSP	Priority Stabilization Plan
A&E	Architecture & Engineering
CRC Net Cost	Cost Recovery Cap Net Cost
PR	Puerto Rico

Acronym	Meaning
HUD	United States Department of Housing and Urban Development
PRDOH	Puerto Rico Department of Housing
CDBG-DR	Community Development Block Grant – Disaster Recovery
406HM	FEMA Section 406 Hazard Mitigation

SYMBOLS

Symbol	Meaning
%	Percent
$	U.S. Dollar
Q	Quarter (e.g., Q1 FY2026)
#	Number (e.g., Project #746545)

II. Executive Summary

Since assuming the role of system operator four years ago, LUMA has remained steadfast in our mission to build a brighter, more reliable, resilient, and customer-focused energy future for the 1.5 million customers we're privileged to serve. Every day, our team takes critical actions to improve grid resiliency and reliability while operating in a fiscally responsible manner.

To achieve real, measurable progress, LUMA has established productive working relationships with the Central Office for Recovery, Reconstruction and Resilience (COR3) and the Federal Emergency Management Agency (FEMA). Additionally, LUMA has been participating in meetings with stakeholders, including PREPA and the Energy Czar aimed at ensuring alignment with Puerto Rico's energy policy. In line with its plan to continue to advance critical projects, LUMA has engaged with our grid recovery partners on the following opportunities:

- United States Department of Housing and Urban Development (HUD) and Puerto Rico Department of Housing (PRDOH) Community Development Block Grant Disaster Recovery (CDBG-DR) programs for hazard mitigation, grid resilience, and cost share.
- FEMA Section 406 hazard mitigation (406HM) proposals in all major asset categories and projects.

LUMA remains committed to efficiently executing projects to fundamentally rebuild, transform, and modernize the energy grid following the decades of neglect under the previous operator. As of the first quarter of fiscal year 2026 (Q1 FY2026), LUMA has achieved the following:

- Started or completed construction on 191 FEMA-funded projects.
- Received FEMA obligation for 221 projects.
- Submitted a total of 282 detailed scopes of work (DSOWs) to COR3 and FEMA for obligation.
- Submitted a cumulative total of 504 transmission and distribution projects (T&D Projects) with COR3 and FEMA.[1]

Received approval from the Puerto Rico Energy Bureau (PREB) for a total of 265 initial scopes of work (ISOWs) submitted for projects and programs.

III. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document provides an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electric transmission and distribution grid.

All information in this document is, unless stated otherwise, as of September 30, 2025.

On June 1, 2021, LUMA assumed operation and maintenance responsibilities for the Puerto Rico Electric Power Authority's (PREPA) Transmission and Distribution (T&D) System, as outlined in the Operations and Maintenance Agreement (OMA) between PREPA, the Puerto Rico Public–Private Partnerships Authority (P3A), and LUMA. Upon commencement of the Service Period, projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and other categories (T&D Projects) were transitioned to, and are now the responsibility of LUMA, while PREPA and Genera are focused on projects in the Generation, Dams, Hydro, and Irrigation asset categories.

[1] *Many of these projects have been inactivated at PREPA's request and are no longer part of the active execution pipeline.*

The 90-Day Plan outlines LUMA's key focus areas.

Over the next 90 days, LUMA will focus on revising DSOWs and cost estimates for T&D projects. The tables below, in section VI, display the existing set of projects and those pending obligation by asset category, as included in the tier 1 priority project list.

A. Realignment of Construction Schedules

In each iteration of the 90-Day Plan, LUMA provides updated projections of key milestones, including construction start dates. This plan reflects updates to some construction start dates as project timelines have had to be adjusted to reflect industrywide market limitations, including the timeline required for the procurement of the Capital Programs' portfolio.

Across the industry, utilities are experiencing manufacturing lead times of more than 40 weeks for equipment such as switchgear and panelboards and between 60-120 weeks for transformers. In each of those categories, there are backlog issues with an expected resolution taking up to six months.

Challenges exist with both materials and construction resources. There are supply shortages impacting raw materials, such as electrical steel, and components, such as sensors. Increased demand for other key raw materials like steel, oil, copper, and insulators is adding to the delays.

To mitigate this, LUMA issued new requests for proposals, including a construction Master Services Agreement (MSA), and worked with COR3 and FEMA to version the long-lead materials PW to allow for additional materials to reduce the long-term challenges.

B. Self-performed work

LUMA will continue to execute self-performed work in the following categories:

- Pole/conductor replacements
- Structure replacements
- Hardware/insulator replacements
- Streetlights
- Substation, feeder, and line minor repairs

- Communication network and grid automation
- Equipment replacements
- Civil and low-voltage work to support projects

Self-performed work includes tasks executed by LUMA's internal teams and contractors. Self-performed work is designated as contracted work (CW), mostly contracted work (MCW), or mostly self-performed work (MSPW).

- **MCW** = more than 65% of the work is procured/contracted (excluding management and oversight).
- **MSPW** = more than 65% of the work is performed by LUMA (excluding management and oversight).
- **A mixture of contracted work and LUMA self-performed work (CW/SPW)** = between 50/50% and 65/35% (excluding management and oversight).

C. Asset Categories and Prioritization Approach

To develop this plan, LUMA has over 250 projects in the Master Plan organized by ten (10) asset classes centered on modernizing and strengthening Puerto Rico's electric transmission and distribution (T&D) system. LUMA's plan aims to improve reliability, resilience, and sustainability. Here are the key areas of investment:

Figure 1.1 provides the eleven programs used for the 10-Year Long Term Investment Plan

Buildings	Focuses on developing, implementing, and sustaining initiatives to improve and maintain the condition of assets under the responsibility of the Facilities Department.
Distribution Feeder Rebuild	Rebuilds overhead and underground lines to boost reliability and resiliency. Includes restoring circuits, completing unfinished work, upgrading voltage, extending service, and hardening lines for critical customers.
Distribution Streetlighting	The Distribution Streetlighting program upgrades and replaces distribution streetlights.

Distribution Automation	Deploy smart devices like reclosers and fault indicators to reduce outage impacts and improve response times.
Grid Modernization	Advances system resilience, reliability, and flexibility through control, communication, automation, and digital technologies. Supports clean energy adoption, enhances security, and improves system visibility—laying the foundation for Puerto Rico's future economic growth.
Substation	This program upgrades and reinforces substations to improve grid reliability and security. Includes upgrades to aging infrastructure and enhanced security measures at transmission substations through advanced technology and hardware.
IT/OT Telecommunications	The IT OT Telecom Systems & Network program deploys smart meters and communication systems to enable real-time data and improve grid efficiency. Includes investments in IT/OT telecom networks that support transmission, distribution, and substation operations.
Transmission	Enhances system recovery, resilience, and modernization through transmission line rebuilds, telecom network upgrades, and priority pole replacements.
Transmission Pole Priority Replacement	The Transmission Priority Pole Replacement program includes replacing damaged overhead transmission poles, towers, and associated hardware and conductors.
Vegetation Management and Capital Clearing	The Vegetation Management and Capital Program clears hazardous vegetation in critical areas and maintains rights of way to standard widths.

Cross functional Asset Category Teams, composed of LUMA personnel, key stakeholders, and technical advisors, have been established for each asset category to accomplish the following goals:

- Develop a clear project description
- Prepare a high-level cost estimate

- Identify potential funding sources
- For the purpose of this 90 Day Plan specifically, each project has also been assigned a time horizon based on its projected construction start date:
    - Near-term (2026–2027)
    - Mid-term (2028–2029)
    - Long-term (2030 and beyond)

To ensure consistency and transparency, four standardized major milestones were defined and applied across all projects. The Asset Category Teams estimated the timing of each milestone based on project complexity, readiness, and alignment with strategic priorities.

Four standardized major project milestones were defined and applied to all projects:

1. 30% Architecture & Engineering (A/E) Design Start – Initial design and scoping activities begin.
2. Submission to COR3 and FEMA – Project is formally submitted for review and approval.
3. Construction/Implementation Start – Field execution or construction activities commence.
4. Closeout Activities Begin – Project enters the final phase of documentation, audit, and financial reconciliation with FEMA and COR3.

Projects were assigned to a time horizon—near-term (2026–2027), mid-term (2028–2029), or long-term (2030 and beyond)—based on the expected start date of the commencement of construction work. Each Asset Category Team applied a tailored prioritization approach based on the unique characteristics of their asset class. However, several common evaluation criteria were used across all teams, including:

- System operational needs and existing grid constraints
- Impact on reliability performance and support for critical load infrastructure
- Mitigation of severe storm hazards and climate resilience
- Regulatory or compliance drivers
- Community and customer impact, including equity and accessibility

This structured approach ensures that LUMA's capital investments are strategically sequenced, and risk informed. These investments are aligned with the overarching goal of transforming Puerto Rico's electric grid into a more reliable, resilient, and modern system.

IV. Plan Overview

The content below summarizes the next steps across the following six areas:

1. Federal Grant Management
2. Funding and Reporting
3. Environmental and Historic Preservation
4. Engineering Management
5. PREPA-LUMA Coordination and Alignment
6. Investment Strategy Overview

A. Federal Funds Office

LUMA goals for the next 90 days:

- LUMA will continue to work with the P3A, PREB, PREPA, Central Office for Recovery, Reconstruction, and Resiliency (COR3) and Genera to provide its input on prioritized T&D investments that leverage available FEMA funding.
- LUMA will continue to work with Genera, PREPA, and the Department of Energy (DOE) to align on approaches to maximize DOE funding to complement FEMA obligated projects and target specific infrastructure to stabilize and harden the system.
- LUMA will continue to work with COR3 and FEMA to obtain obligation for identified Tier 1 priority projects, including vegetation clearing, transformer replacements to stabilize the system, the deployment of grid automation, and priority transmission and distribution repair and reconstruction projects.
- LUMA will continue to work with COR3 and FEMA to align and develop accurate cost estimates for work, including the execution of an island-wide vegetation clearing initiative, through the submission of detailed scopes of

work (DSOWs) representing individual lines and grouped projects targeting 38kV, 115kV and 230kV Transmission clearing in support of the DOE 202c Directive.

- LUMA will continue to develop and submit DSOWs for priority projects and initiatives to align with its execution strategy and the collaboratively developed priority project list with PREPA and Genera.
- LUMA will continue working with COR3 and FEMA on project and DSOW amendments for 428/406 proposals and work completed amendments.
- LUMA will continue to focus and prioritize the efforts of the Grid Automation program on submitted DSOWs to complete work identified on the LUMA and FEMA priority list with a specific focus on obligation timelines as the projects are staged for construction.
- In the Grid Automation and Streetlighting programs, LUMA will continue to prioritize and work with COR3 and FEMA on the documentation and project amendments of work completed for streamlining obligation and cost recovery with specific project DSOWs.
- LUMA will work closely with COR3 and FEMA in developing additional work miles for vegetation clearing to include processes for including Off-ROW hazard mitigation clearing.

<u>During the last 90-day period, LUMA completed the following:</u>

- LUMA initiated the Equipment and Materials Project Worksheet (PW) reconciliation process for both obligated and nonobligated projects, to include furthering the progress with the signing of Version 7 of the Equipment and Materials PW.
- LUMA, COR3 and FEMA held site visits to view and walk down selected Distribution clearing work completed on November 7th, 2025. More site visits being planned for Transmission Lines.
- LUMA continue to work on aligning with FEMA on Vegetation 428/406 clearing splits and costs per mile for all Transmission voltages for 38kV, 115kV and 230kV following Independent Expert Panel (IEP) report and its implementation in the Vegetation Program.

- LUMA submitted for review all 115kV and 230kV Transmission lines proposed for vegetation clearing.
- LUMA submitted to FEMA single Distribution feeders proposed for vegetation clearing based on criteria for reliability and risks of damages to the PR Grid.
- LUMA provided COR3 and FEMA with updates about where construction can be accelerated based on the shared list of priority projects that continues to be revised regularly. Sharing this information supports the 90-Day Plan, project formulation, obligation, and moving projects to construction.

B. Funding and Reporting

LUMA goals for the next 90 days:

- LUMA expects to submit several Area Plans to the Puerto Rico Energy Bureau (PREB) for approval aligning both Maria and Fiona asset and facility repairs as a comprehensive recovery strategy.
- LUMA will submit to the PREB the Federal Funding report for Q2 of FY2026.

During the last 90-day period, LUMA completed the following:

- LUMA submitted $839 million in requests for reimbursements to date.
- LUMA submitted the Q1 FY2026 Federal Funding report to the PREB, highlighting LUMA's progress in executing activities related to federally funded T&D projects.

C. Environmental and Historic Preservation (EHP)

LUMA goals for the next 90 days:

- LUMA will continue discussions with FEMA Environmental & Historical Preservation (EHP), PREPA, and the State Historic Preservation Office (SHPO) regarding reconsideration on the Monacillos' campus historic

elements and, as applicable, agree on viable alternatives to mitigate any impacts associated with the Tier 1 priority Primary Control Center Project.

- LUMA will continue with weekly FEMA EHP meetings and consultations to support project development and execution.
- LUMA will continue environmental field inspections on construction and vegetation projects with FEMA-approved DSOWs. The inspections include assessments of the following:
    - Adherence to requirements for equipment use, vegetation clearing, waste handling, and other activities
    - Employee training in environmental awareness
    - Measures being taken to protect endangered and protected species
    - Ground disturbance management practices
    - Compliance with archaeological and/or historic site considerations
    - Ensure proper execution of work near bodies of water (buffer zones and/or permits)
    - Manage waste (e.g., staging, segregation, transportation) and final disposition (landfill, recycling, or reuse)
- LUMA will continue conducting archaeological desktop reviews and Reconnaissance-Survey to support the development of DSOWs.

<u>During the last 90-day period, LUMA completed the following:</u>

- LUMA agreed with FEMA EHP regarding the approach proposed by the Department of Energy Executive Order 202c for transmission line vegetation projects.
- LUMA agreed with FEMA EHP regarding the authorization to perform borings covered by the A&E REC without additional EHP review.
- LUMA agreed with FEMA EHP of the criteria for urban/rural maps to define the archaeological/cultural Areas of Potential Effect (APE) in transmission and distribution projects

D. Engineering Management

LUMA goals for the next 90 days:

- Design work will continue for 11 Distribution Feeder Rebuild projects included in the FEMA Tier 1 project list (6 feeders previously submitted to FEMA and 5 Vieques and Culebra feeders). Obligation process for 6601-03 and 5 Vieques and Culebra feeders to continue. Versioning including 406 Hazard Mitigation for the 6 feeders will be submitted to FEMA for review.
- LUMA is continuing to work on improving distribution system models and ensuring that computer-based models match the physical condition of the grid.
- LUMA's Grid Automation program will continue to deploy single-phase and three-phase reclosers and fuse cutouts to improve overall system reliability by reducing the number of customers impacted by faults on the circuit and shortening restoration times.

During the last 90-day period, LUMA completed the following:

- During this period, LUMA continued with detailed engineering on 6 of the worst-performing distribution circuits and the 5 Vieques and Culebra feeders. The DSOW packages for six feeders in PREPA's priority list were reviewed by FEMA and five were obligated - 1620-02, 8101-03, 1529-15, 1303-02 and 3502-02. A sixth feeder (6601-03), and the 5 Vieques and Culebra feeders still in obligation process.
- LUMA continued preliminary engineering design work with existing Architectural and Engineering (A&E) firms toward the development of DSOWs.
- LUMA continued engineering on all projects with FEMA-approved DSOWs.

E. PREPA-LUMA Coordination and Alignment

PREPA and LUMA goals for the next 90 days:

- PREPA and LUMA leadership will participate in regular weekly meetings with COR3, FEMA, and Genera to ensure visibility of project progress, coordination and understanding of common matters, and the identification and resolution of risks that involve points of integration between the entities.
- LUMA will continue to coordinate with PREPA and Genera to support successful operations under the T&D OMA.
- LUMA, PREPA, and Genera will continue to collaborate on the Vieques and Culebra Microgrid Projects.
    - LUMA has assumed project lead responsibilities, including the coordination of project handoffs for the design, construction, and post-production phases for the appropriate operational jurisdictions.
    - Genera has assumed responsibility for operating the controllable generation, as well as the submission of a project for a generator and its procurement.
    - LUMA is engaged with COR3 and P3A to continue collaboration on project construction and operational jurisdiction challenges related to the OMA between LUMA and PREPA.

V. Investment Strategy Overview

The Investment Strategy team plays a critical role in shaping and executing the long-term investment strategy for LUMA, ensuring alignment with our mission to transform Puerto Rico's electric grid.

The team's responsibilities include:

- Development of the Long-Term Investment Plan – Designing a forward-looking, data-driven roadmap that aligns capital investments with strategic grid modernization goals.
- Prioritizing Spend & Balancing the Portfolio – Ensuring optimal allocation of resources across programs and projects to maximize value and impact.
- Financial Analysis – Conducting rigorous financial assessments to support investment decisions and ensure fiscal responsibility.
- Regulatory Support – Providing critical inputs and documentation to support regulatory filings and compliance efforts.

- Execution & Risk Assessment – Evaluating the organization's capacity to deliver on planned investments while identifying risks and opportunities.
- Ad-Hoc Reporting & Insights – Developing tailored reports and dashboards to inform decision-making at all levels of the organization.
- Enterprise Collaboration – Facilitating cross-functional discussions to align priorities, share insights, and foster a unified investment approach across LUMA.

Through these efforts, the Investment Strategy team enables LUMA's leadership to make informed, strategic decisions that accelerate grid transformation, enhance reliability, and deliver long-term value to the people of Puerto Rico.

Figure 1.2 summarizes the five investment focuses areas that were designated and provides illustrative components within each area.

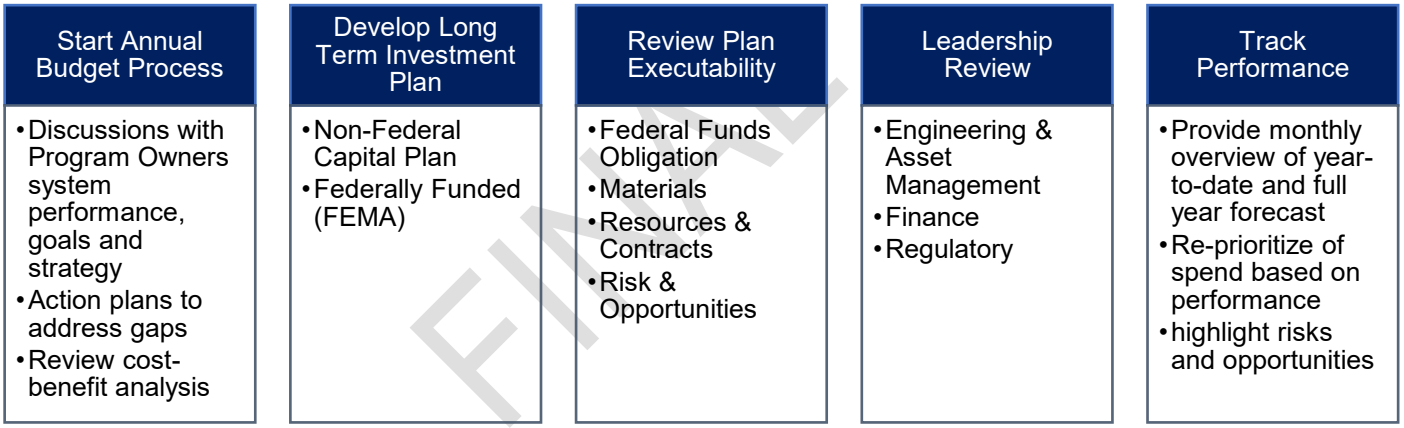


Table 1.1 – Total Obligated Project Estimated Cost by Asset Category and Funding Source ($M)

Asset	FEMA 428	FEMA 406	A&E	Total LUMA Expected Cost
Distribution – Feeder Rebuild	$26	-	$5	**$31**
Distribution – Pole Replacement	$175	$14	$13	**$202**
Distribution – Streetlighting	$603	$55	$114	**$772**
Grid Automation	$39	$.4	$5	**$45**
Substation	$518	$31	$59	**$608**
Telecommunications	$400	$546	$25	**$971**
Transmission	$183	$2	$12	**$197**
Transmission – Pole Replacement	$5	$.2	$.7	**$6**
Vegetation	$24	$357	$2	**$383**
Total	**$1,612**	**$864**	**$109**	**$2,699**

Table 1.2 – FEMA FY26 Monthly Execution by Asset ($M)

Asset	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
Distribution - Feeder Rebuild	$2.5	$1.9	$2.5	$4.6	$3.6	$6.9	$4.2	$5.6	$10.8	$16.4	$16.4	$17.4	**$92.8**
Distribution - Pole Replacement	$8.9	$7	$10.1	$6.9	$7.4	$7.8	$6.6	$5.7	$5.7	$2.8	$2.8	$2.7	**$74.4**
Distribution - Streetlighting	$10.8	$15	$10.1	$21.2	$18.3	$20.2	$20.9	$20.9	$21.9	$19.9	$14.2	$11.3	**$204.7**
Grid Automation	$1.8	$0.2	$0.8	$7.3	$7.3	$7.3	$7.3	$8.3	$8.9	$9.1	$9.3	$9.6	**$77.2**
Substation	$3.5	$8.4	$14.6	$8.7	$8.1	$8.3	$10.6	$11.3	$11.3	$13.1	$11.3	$11.7	**$120.9**
Telecommunications	$10.4	$19.1	$29.2	$14.4	$14.8	$14.7	$19.5	$22	$19.3	$21.7	$21.8	$23.7	**$230.6**
Transmission	$0.4	$0	$1.1	$9.8	$9.8	$6.6	$6.3	$6.3	$4.9	$5.1	$5.4	$4.7	**$60.3**
Transmission - Pole Replacement	$0	$1	$0.3	$1.3	$0.9	$1.3	$1.3	$1.2	$1.6	$2	$2.8	$2.7	**$16**
Vegetation	$4.5	$4.2	$3.3	$9.7	$10.2	$7.3	$10.5	$17	$19.1	$19.4	$20.7	$20.1	**$145.9**
Total	**$40.1**	**$54.2**	**$70.6**	**$80.8**	**$77.1**	**$77.4**	**$82.6**	**$92.8**	**$100.8**	**$106.7**	**$102.3**	**$100.7**	**$1,023**

Note: July-September numbers reflect actual financial data as reported to the Puerto Rico Energy Bureau. October-June are budgeted amounts for FY26.

Figure 1.3

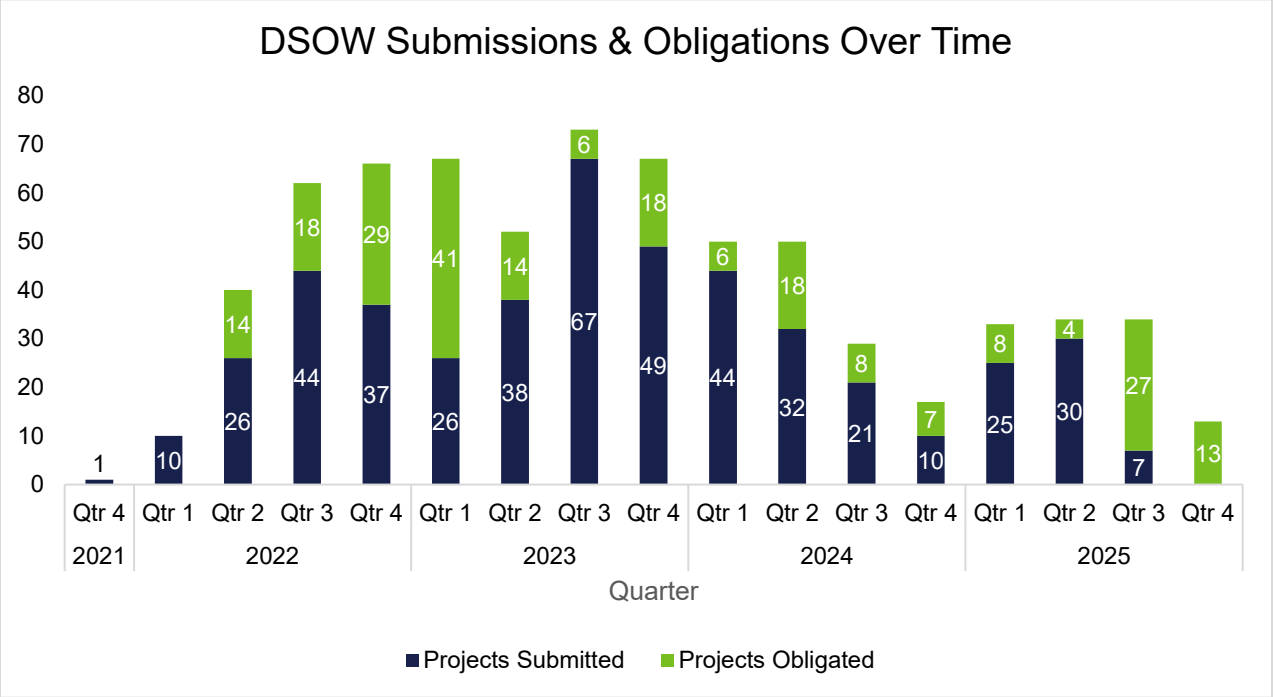
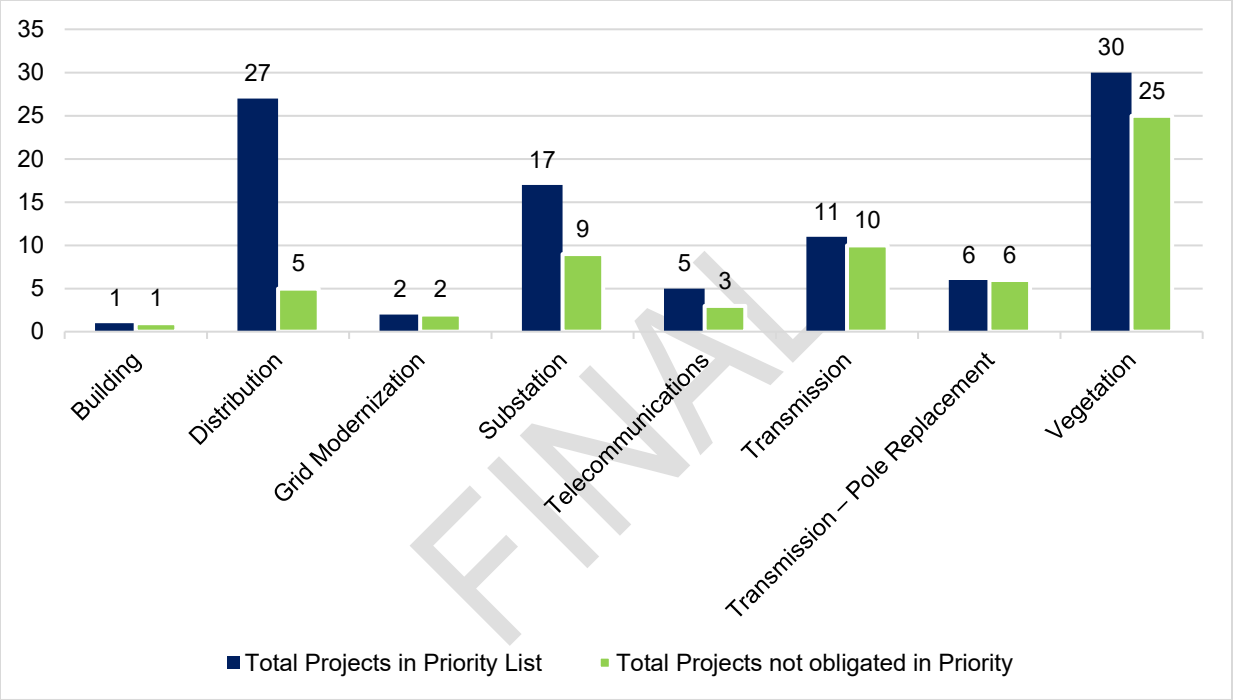


Figure 1.4 – Total Priority Projects
Currently there are 99 projects on the tier 1 priority list, which are divided between the following asset classes.

Included below, we list all the projects with initial DSOW submission dates, revised DSOW submission dates and construction start dates, among several other data points.



VI. Project DSOW Submission and Construction Schedule

To provide clarity and structure around our strategic initiatives, this 90-Day Plan categorizes projects based on their expected time horizon. This approach helps to align priorities, allocate resources effectively, and set realistic expectations for delivery. Each project has been assigned to one of the following timeframes:

- Near-term (2026–2027): Projects that are expected to begin construction within the stated timeframe. These are typically high-priority, foundational efforts with immediate impact.
- Mid-term (2028–2029): Initiatives that build upon near-term work, often requiring more complex planning, cross-functional coordination, or emerging capabilities.
- Long-term (2030 and beyond): Forward-looking projects that align with our long-range vision. These may involve innovation, infrastructure transformation, or initiatives that position us for future success.

Table 1.3 – Number of Priority Projects by Asset Category and Time Horizon (defined by construction start)

Asset Category	Near-Term (2026-2027)	Mid-Term (2028-2029)	Long-Term (2030+)	Total
Buildings	1	0	0	**1**
Distribution-Feeder Rebuild	2	0	0	**2**
Distribution-Pole Replacement	0	0	0	**0**
Distribution-Streetlighting	1	0	0	**1**
Distribution Automation	2	0	0	**2**
Grid Modernization	2	0	0	**2**
Substation	9	0	0	**9**
Transmission	8	2	0	**10**
Transmission-Pole Replacement	6	0	0	**6**
Telecommunications	3	0	0	**3**
Vegetation	25	0	0	**25**
Total	**59**	**2**	**0**	**61**

A. Near-Term Priority Projects Overview & Profile

The near-term priority group includes approximately **59 projects** that are set to commence construction between **2026 and 2027**, pending timely obligation by FEMA

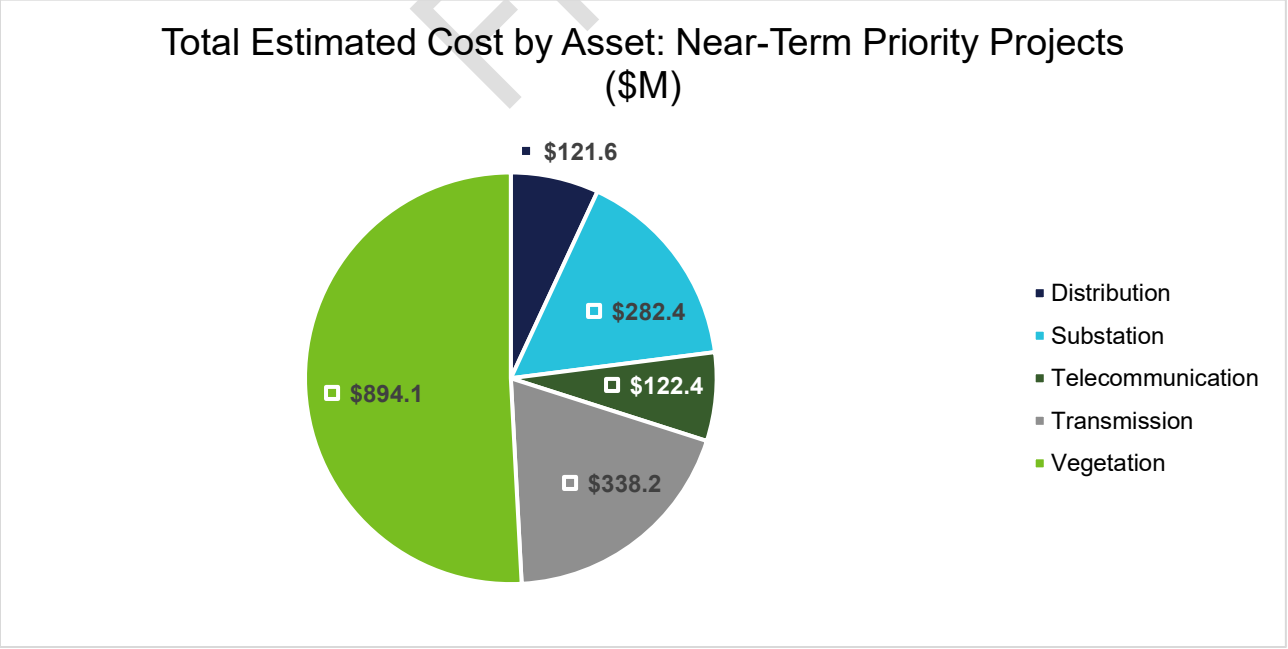
These projects represent a significant portion of the total amount of projects in pipeline and are strategically positioned to deliver early, visible progress on grid transformation. The **estimated cost** for this group is approximately **$1.76 billion**.
Several factors contribute to the concentration of projects in this horizon:

- A strategic push to deliver **tangible results early** in the program.
- A subset of projects have already completed **preliminary engineering** and are ready to advance.
- Some initiatives are **large in scale** and require early initiation to meet long-term completion targets.
- Many projects involve **preparatory work**—such as demolition, environmental remediation, permitting, and right-of-way access—that must be completed before construction begins.

This phase lays the groundwork for broader transformation efforts and reflects LUMA's commitment to accelerating progress where readiness and impact are highest.

Refer to appendix A for a detailed table of the near-term priority projects and their estimated costs.

Figure 1.5



Note: Total LUMA Expected Cost (406+428)

Near-Term (2026-2027), Priority Projects

1. *Buildings*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the Financial Oversight and Management Board (FOMB) and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
746545*	FAASt [Primary Control Center / Secondary Data Center & Control Room]	Apr-24	N/A	Mar-26	MCW	Pending Obligation

**Note: Primary Control center DSOW originally submitted under FAASt #657300 in June 2023. FEMA continued EHP review of DSOW during change in FAASt numbers.*

2. *Distribution – Feeder Rebuild*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
801166	FAASt [Feeder Rebuild # 6601-03]	Apr-25	Jul-26	Jan-27	MCW	Pending Obligation
165226	FAASt [Feeders Vieques & Culebra]	Dec-22	N/A	Aug-26	CW/SPW	Pending Obligation

3. *Distribution - Streetlighting*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
714641	FAASt [Rincón Streetlighting]	Dec-23	N/A	Mar-26	CW/SPW	Pending Obligation

4. *Distribution - Automation*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
746309	FAASt [Automation Program Group 30]	Apr-24	N/A	Nov-25	CW/SPW	Pending Obligation
757699	FAASt [Automation Program Group 34]	Mar-25	Dec-25	Jan-26	CW/SPW	$2,755,938

5. *Grid Modernization*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
751656	FAASt [Culebra Microgrid]	Jul-24	Jul-26	Dec-26	MCW	Pending Obligation
751655	FAASt [Vieques Microgrid]	Jul-24	Jul-26	Dec-26	MCW	Pending Obligation

6. *Substation*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
169058	FAASt - Llorens Torres MC 1106 - Equipment Repair & Replacement	May-22	N/A	Apr-26	MCW	Pending Obligation
169276	FAASt Substation - Viaducto TC - MC 1100 -	Mar-23	Jul-26	Dec-27	MCW	Pending Obligation

	Equipment Repair & Replacement					
723002	FAASt - EPC - Jobos TC	Jun-23	Jul-26	Mar-27	MCW	Pending Obligation
550106	FAASt [Conquistador CH]	Jun-23	Jul-26	Feb-23	MCW	Pending Obligation
178577	FAASt [Cachete – MC 1526]	Oct-23	Jul-26	Jul-27	MCW	Pending Obligation
682328	FAASt [Bayamón TC - Rebuild]	Nov-23	May-26	Jun-27	MCW	Pending Obligation
746660	FAASt [Minor Protection, Automation, and Control [PAC] Replacement]	Apr-24	N/A	Apr-26	MSPW	Pending Obligation
551914	FAASt [Caparra 1911 & 1924]	Jun-24	N/A	Mar-27	MCW	Pending Obligation
547187	FAASt - [Substation Component Replacement Program]	Mar-25	Jul-26	Jun-26	MCW	Pending Obligation

7. *IT & Telecommunications*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
662238	FAASt [Microwave Point-to-Point Backbone]	May-23	N/A	Dec-26	MCW	Pending Obligation

551926	FAASt [SCADA Remote Access and RTU Replacements Group 2]	Sep-23	N/A	Sep-26	MSPW	Pending Obligation
678800	FAASt [Telecom Infrastructure – Group B]	May-24	Jul-25	Jan-27	MCW	$13,204,825

8. *Transmission*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
167446	FAASt - Line 36100 (115kV) - Dos Bocas HP to Monacillos TC	Jun-23	Feb-26	May-26	MCW	$33,956,314
165213	FAASt – Line 5400 – Rio Blanco HP to Daguao TC to Punta Lima TO to Vieques 2501 to Culebra 3801	Nov-22	N/A	Mar-27	MCW	Pending Obligation
176913	FAASt [Palo Seco SP to Catano Sect 38kV Line-9500]	Jul-22	Feb-26	Jun-26	MCW	$33,526,671
756997	FAASt [TL 1900 Caguanas to Lares TO]	Sep-24	May-26	Dec-26	MCW	Pending Obligation

334470	FAASt [TL 3100 Monacillos TC to Sabana Llana TC]	Sep-24	Jan-26	Jul-26	MCW	$47,112,099
176971	FAASt –38kV Line 8200 - San Juan SP to Catano Sect Line	Jul-22	Sep-26	Aug-26	MCW	$21,670,623
547251	FAASt Line 2400 Dos Bocas HP to America Apparel	Jul-25	July-26	Dec-26	MCW	Pending Obligation
180052	FAASt Ponce TC to Jobos TC - 38kV 100 & 200	Aug-22	Jan-26	Nov-26	MCW	$74,520,098

9. *Transmission – Pole Replacement*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
750168	FAASt [Transmission Priority Pole Replacement Program Line 4800 Santa Isabel TC – Aibonito TO]	Jun-24	N/A	Dec-25	CW/SPW	$ 469,229
711819	FAASt [TL 13400 TC-San German Sect-La Parguera Sect]	Dec-23	N/A	Oct-23	CW/SPW	Pending Obligation

749072	FAASt [Transmission Priority Pole Replacement Program Line 2700 Aguadilla Hospital Distrito Sect – Mora TC]	Jun-24	Jun-24	Dec-25	CW/SPW	$827,007
750150	FAASt [Transmission Priority Pole Replacement Program Line 4800 Santa Isabel TC – Toro Negro 1 HP]	Jun-24	Jun-24	Jan-26	CW/SPW	$134,148
749060	FAASt [Transmission Priority Pole Replacement Program Line 5600 Victoria TC – Añasco TC]	Jun-24	N/A	Jan-26	CW/SPW	Pending Obligation
750151	FAASt [Transmission Priority Pole Replacement Program Line 700 Costa Sur SP – Yauco 2 HP]	Jun-24	N/A	Apr-26	CW/SPW	Pending Obligation

10. *Vegetation*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]
727608	FAASt [Region 1 San Juan TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727659	FAASt [Region 2 Arecibo TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727522	FAASt [Region 3 Bayamon TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727606	FAASt [Region 4 Caguas TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727657	FAASt [Region 5 Mayaguez TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727529	FAASt [Region 6 Ponce TL - 115kV]	Jul-23	Aug-25	Jan-26	MCW	Pending Obligation
727572	FAASt [Region 3 -Bayamon Group A] High Density	Aug-23	N/A	May-26	MCW	Pending Obligation
741105	FAASt [All Regions TL - 230kV]	Dec-23	Aug-25	Jan-26	MCW	Pending Obligation
750067	FAASt [Region 2 -Arecibo Group A] Low Density	Nov-24	N/A	May-26	MCW	Pending Obligation
750065	FAASt [Region 3 -Bayamon Group A] Low Density	Nov-24	N/A	May-26	MCW	Pending Obligation

750066	FAASt [Region 4 -Caguas Group A] Low Density	Nov-24	N/A	Jun-26	MCW	Pending Obligation
750068	FAASt [Region 5 -Mayaguez Group A] Low Density	Nov-24	N/A	May-26	MCW	Pending Obligation
750063	FAASt [Region 6 -Ponce Group A] Low Density	Nov-24	N/A	May-26	MCW	Pending Obligation
956345	FAASt [Arecibo Region 2 Transmission Line 2400 – Dos Bocas HP to Coronillas 2]	Jun-25	N/A	May-26	MCW	Pending Obligation
956348	FAASt [Bayamon Region 3 Transmission Line 10000 – Bayamon Pueblo to Magnolia TO]	Jun-25	N/A	May-26	MCW	Pending Obligation
956357	FAASt [Mayaguez Region 5 Transmission Line 1900 – Dos Bocas HP to San Sebastian TC]	Jun-25	N/A	May-26	MCW	Pending Obligation
956343	FAASt [Ponce Region 6 Transmission Line 4800 – Toro Negro to Aibonito, Santa Isabel]	Jun-25	N/A	May-26	MCW	Pending Obligation
956330	FAASt [Caguas Region 4 - Feeder 3007-03]	Jun-25	N/A	May-26	MCW	Pending Obligation
956339	FAASt [Caguas Region 4 -	Jun-25	N/A	May-26	MCW	Pending Obligation

	Feeder 3301-01]					
956337	FAASt [Mayaguez Region 5 Feeder 6012-02]	Jun-25	N/A	May-26	MCW	Pending Obligation
956331	FAASt [Mayaguez Region 5 Feeder 6014-02]	Jun-25	Jul-26	May-26	MCW	Pending Obligation
956340	FAASt [Ponce Region 6 Feeder 5602-02]	Jun-25	Jul-26	May-26	MCW	Pending Obligation
956341	FAASt [Ponce Region 6 Feeder 5803-02]	Jun-25	Jul-26	May-26	MCW	Pending Obligation
956335	FAASt [San Juan Region 1 - Feeder 2301-02]	Jun-25	Jul-26	May-26	MCW	Pending Obligation
956332	FAASt [San Juan Region 1 - Feeder 2401-01]	Jun-25	Jul-26	May-26	MCW	Pending Obligation

B. Mid-Term Priority Projects Overview & Profile

The mid-term horizon includes projects that are expected to begin construction between **2028 and 2029**. These initiatives build on the momentum of the near-term phase and focus on expanding modernization efforts across the grid.
Projects in this group are typically more complex or dependent on the completion of near-term work. They may also involve longer lead times for design, permitting, or procurement.

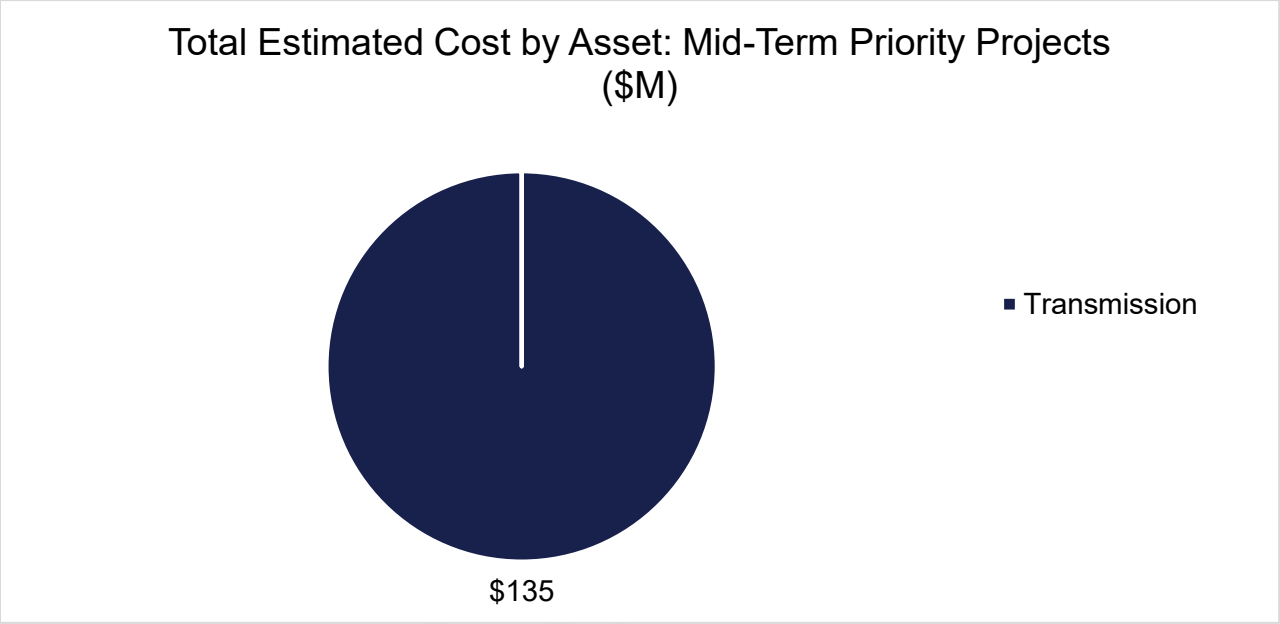
This phase is critical for:

- **Scaling grid automation and resilience** technologies.
- Advancing **regional system upgrades** that require phased implementation.
- Addressing **interdependencies** between asset categories and project sites.

The mid-term group ensures continuity in execution and supports the transition from foundational improvements to more integrated, system-wide enhancements.

- Estimated number of projects: 2
- Estimated in-scope cost: $135.3 million

Figure 1.6 shows the distribution of estimated costs by asset category for this period.



Note: Total LUMA Expected Cost (406+428)

Mid -Term (2028-2029), Priority Projects

1. *Transmission*

[1]Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

[2]The obligated amount represents the CRC net cost. A&E is not included in this amount.

[3]The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date[3]	Construction Start Date[1]	Self-Performed Work	Obligation Amount[2]

168483	FAASt - 115kV Line 36400 - Dos Bocas HP to Ponce TC (Transmission)	Aug-22	Jul-26	Jul-29	MCW	Pending Obligation
756999	FAASt [TL 1900 Lares TO to San Sebastian] (Transmission)	Oct-24	May-26	Jul-28	MCW	Pending Obligation

C. Long-Term Priority Projects Overview & Profile

The long-term horizon includes projects that are expected to begin **construction 2030 or later**. These initiatives represent the final phase of the 10-Year Plan and are focused on **transformational infrastructure** that requires extensive planning, coordination, and sequencing.
Projects in this group may be:

- **Highly complex**, involving major transmission corridors or regional system reconfigurations.
- Dependent on **regulatory approvals**, environmental reviews, or multi-agency coordination.
- Designed to support **future energy integration**, including renewables and distributed energy resources.

This phase ensures that LUMA's long-term vision for a **resilient, modern, and sustainable grid** is fully realized.

- Estimated number of projects: 0
- Estimated in-scope cost: $0 million

VII. Amendments: 428/406 Priorities and Schedule

In alignment with FEMA's Public Assistance Program requirements, LUMA continues to advance the reconciliation and amendment process for projects funded under Sections 428 and 406. This process is critical to ensure that project scopes, costs, and execution strategies remain aligned with evolving system needs, regulatory guidance, and funding eligibility criteria. Over the past quarter, LUMA has begun the planning of submission of amendments for both obligated and non-obligated projects, including cost adjustments, scope refinements, and work-completed reconciliations.

These amendments are essential to support accurate cost recovery, streamline obligation timelines, and maintain alignment with the Tier 1 priority project list. To date, LUMA is currently working on 48 project amendments, 41 of which fall into the 90 Day period. In the following table we detail the pending submissions up until March 30, 2026.

Table 1.5 – Amendments: 428/406 Priorities and Schedule

Month	Num. of Projects Submitted & Pending	428 Estimated Reconciliation*	406 Estimated Reconciliation*
Sep.	2	$.5M	$.4M
Nov.	4	$4.5M	$3.1M
Dec.	10	$49M	$5M
Jan.	19	$458M	$48M
Feb.	5	$140M	$57M
Mar.	1	$33M	$23M
TOTAL	**41**	**$685M**	**$136.5M**

*Note: *Values are estimates, subject to change*

VIII. Appendix

- Construction timeline, titled **FEMA Project Milestone Report**, as requested by FEMA on September 4, 2025, to be included in prospective submissions of the 90 Day Plan.