

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

NEPR

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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:** 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”),<sup>1</sup> 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 1<sup>st</sup> Order”). In the February 1<sup>st</sup> 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

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<sup>1</sup> 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 1<sup>st</sup> Order, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA<sup>2</sup>, 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 1<sup>st</sup> 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 27<sup>th</sup> Motion.

4. In compliance with the February 1<sup>st</sup> Order and the April 23<sup>rd</sup> Resolution, Genera respectfully submits to the Energy Bureau its Monthly Progress Report for the BESS Project for the month of November 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 November 2025, submitted as Exhibit A to this Motion; and **deem** Genera to be in partial compliance with the February 1<sup>st</sup> Order and April 23<sup>rd</sup> Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of December 2025.

*(Signatures appear on the following page.)*

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<sup>2</sup> LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

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## 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](mailto:alexis.rivera@prepa.pr.gov); [nzayas@gmlex.net](mailto:nzayas@gmlex.net); [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net); [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com); [emmanuel.porrogonzalez@us.dlapiper.com](mailto:emmanuel.porrogonzalez@us.dlapiper.com).

In San Juan, Puerto Rico, this 10<sup>th</sup> day of December 2025.

*/s/ Jorge Fernández-Reboredo*  
Jorge Fernández-Reboredo

*/s/ José Javier Díaz Alonso*  
José Javier Díaz Alonso

*/s/ Stephen David Romero Valle*  
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*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

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### **BESS Monthly Report**

#### ***Cambalache Plant:***

- RG Engineering is working in site grading (cut and fill).
- Contractor finished the mesh installation for erosion control as part of the Permiso Unico Incidental (PUI) permit (No. 2025-652964-PUI-301906).
- Construction coordination meetings are held every Tuesday at 8:30 AM.
- Construction is ongoing as planned.

#### ***Vega Baja Plant:***

- ARG Ceres has mobilized to Vega Baja site.
- ARG Ceres contractor started demolishing concrete pads around the site.
- Construction coordination meetings are held every Tuesday at 1:00 PM.
- The PUI has been submitted for approval to DNER.
- Construction coordination meetings with Contractor are held every Tuesday at 1:00pm
- LUMA submitted its quote for the fiber line relocation, and coordination efforts are underway. LUMA will confirm the scheduled date for executing the relocation.

#### ***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. Genera is currently removing inventory from the warehouse. We expect to have an RFP to demolish the existing warehouse and installation of BESS by First Quarter 2026.

**Costa Sur Plant:**

- Notice to Proceed was sent to RG Engineering on November 17, 2025, for Civil and Structural Works at Costa Sur Site.
- Genera expects contractor to be on site by January 2026.
- Construction coordination meetings with Contractor are held every Thursday at 8:30 AM.

**Aguirre Plant:**

- Contract has been signed by Genera and RG Engineering for Civil and Structural Works.
- Notice to Proceed was sent to RG Engineering for December 1, 2025, for Civil and Structural Works at Costa Sur Site.
- Construction coordination meetings with Contractor are held every Thursday at 1:00pm.
- Genera expects contractor to be on site by January 2026.

**Yabucoa Plant**

- Genera expects contractor to be on site by January 2026.
- Notice to Proceed will be send in December 2025.
- Construction coordination meetings with Contractor are held every Thursday at 2:00 PM.

**LUMA Interconnection Studies**

- Interconnection Impact Studies for Cambalache, Vega Baja, Costa Sur, Aguirre, and Yabucoa were received from LUMA on August 20, 2025. The Palo Seco report is still pending and is expected in December 2025.
- Interconnection Facilities Studies have been received: Vega Baja, Aguirre, and Costa Sur on November 14, 2025, and Yabucoa on November 26, 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 December 2025.
- An RFP will be issued in the first quarter of 2026 for the construction of the Point of Interconnection (POI) since Genera received the facilities studies.
- Coordination meetings with LUMA are held every Wednesday at 2:00 PM.

### **Permits**

- The PUI permit for Vega Baja has been submitted 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 January 20, 2026.
- Another RFP is in the development phase for LUMA's Interconnection Facility Studies related to switchyard upgrades for the first quarter of 2026.
- Tesla 24 Megapack has arrived in Puerto Rico for installation at Cambalache Site.

- The Medium Voltage Transformer 52 (MVT) has arrived for installation at Cambalache, Vega Baja and Costa Sur sites.
- Additional Batteries and MVT will be arriving in December 2025.