

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

NEPR

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IN RE:

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 Submitting One FEMA
Approval of Project, Request for Confidential
Treatment, and Supporting Memorandum of Law**

**MOTION SUBMITTING ONE FEMA APPROVAL OF PROJECT, REQUEST FOR
CONFIDENTIAL TREATMENT AND SUPPORTING MEMORANDUM OF LAW**

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 submits the following:

I. Submittal of One FEMA Approval and Request for Confidentiality

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 transmission and distribution projects ("T&D Projects" or "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 26th 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. The Energy Bureau thereafter determined that this directive should be applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On July 8, 2021, LUMA filed a *Motion Submitting List of Projects and Twenty-Eight Scopes of Work* (“July 8th Motion”). In the July 8th Motion, LUMA submitted twenty-eight (28) SOWs for T&D Projects for the Energy Bureau’s review and approval prior to submitting them to COR3 and FEMA. Among the twenty-eight SOWs, LUMA submitted the “Distribution Feeders – Mayaguez Short Term Group 3” SOW.

3. On August 20, 2021, the Energy Bureau issued a Resolution and Order that determined that all the SOWs for T&D projects submitted by LUMA in the July 8th Motion were necessary to improve the system’s reliability (“August 21st Order”). Therefore, it approved most of the projects presented in the July 8th Motion, including the “Distribution Feeders – Mayaguez Short Term Group 3” SOW. The Energy Bureau also ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project within ten (10) days of receiving such approval.

4. In compliance with the August 20th Order, LUMA hereby submits a copy of the “FAAST [Feeder Rebuild # 6601-03] (Distribution)”¹ T&D Project approval by FEMA, which was obligated on January 8, 2026. *See Exhibit 1*² to this Motion. The document contains FEMA’s approval and includes the costs obligated for this Project.

5. LUMA is submitting herein a redacted public version of the FEMA approval (**Exhibit 1**) protecting confidential information associated with Critical Energy Infrastructure Information (“CEII”). As explained in this Motion, portions of the FEMA approval of the “FAAST [Feeder Rebuild # 6601-03] (Distribution)” T&D Project are protected from disclosure as CEII, *see, e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. § 388.113 (2020), and pursuant to the Energy Bureau’s

¹ Part of the “Distribution Feeders - Mayaguez Short Term Group 3” SOW.

² Please note that **Exhibit 1** has digitalization and table format issues, which are found on the documents as issued by FEMA.

Policy on Management of Confidential Information. *See* Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.

II. Memorandum of Law in Support of Request for Confidentiality

A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau

6. The bedrock provision on the management of confidential information filed before this Energy Bureau, is Section 6.15 of Act 57-2014, known as the “Puerto Rico Energy Transformation and Relief Act.” It provides, in pertinent part, that: “[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such [...]” 22 LPRA § 1054n (2025). If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.* § 1054n(a).

7. Access to confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.* § 1054n(b). Finally, Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review.” *Id.* § 1054n(c).

8. Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico.

9. Moreover, the Energy Bureau's Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ¶ 3. The party that seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* at ¶ 6.

10. The Energy Bureau's Policy on Management of Confidential Information states the following with regard to access to validated CEII:

Critical Energy Infrastructure Information ("CEII")

The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties' authorized representatives only after they have executed and delivered the Nondisclosure Agreement.

Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or

disseminate the reviewed information and may bring no recording device to the viewing room.

Id. at § D (on Access to Validated Confidential Information).

11. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that “a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed according to [...] Article 6.15 of Act No. 57-2015, as amended.” *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms*, § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

B. Request for Confidentiality

12. The FEMA approval included in **Exhibit 1** contains portions of CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the FEMA approval with CEII warrants confidential treatment to protect critical infrastructure from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII

under seal of confidentiality.³ In at least two Data Security and Physical Security proceedings,⁴ this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure.

13. Similarly, the Energy Bureau has granted LUMA's requests for confidential treatment of portions of the FEMA approvals submitted for approval in the present case. Notably, the Energy Bureau has granted LUMA's request for confidential treatment of portions of FEMA Approvals of Projects submitted for consideration and authorization. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

14. As mentioned above, the Energy Bureau's Policy on Management of Confidential Information provides for the management of CEII. It directs that the parties' authorized representatives access information validated as CEII only after executing and delivering a Non-Disclosure Agreement.

15. CEII or critical infrastructure information is generally exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

³ *See e.g., In re Review of LUMA's System Operation Principles*, NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority's System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA's Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan*, NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrad Transmission and Distribution Investments*, NEPR-MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII. However, *see* Resolution and Order of February 12, 2021, reversing in part, grant of confidential designation).

⁴ *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
- (iv) Does not simply give the general location of the critical infrastructure.

Id.

23. Additionally, “[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, “[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.” *Id.*

24. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”).⁵

⁵ Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

- (A) shall be exempt from disclosure under the Freedom of Information Act;
- (B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision-making official;
- (C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
- (D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
 - (i) in furtherance of an investigation or the prosecution of a criminal act; or
 - (ii) when disclosure of the information would be--
 - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
 - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office
- (E) shall not, be provided to a State or local government or government agency; of information or records;
 - (i) be made available pursuant to any State or local law requiring disclosure of information or records;

CII is defined as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems [...]” 6 U.S.C. § 671 (3).⁶

25. Portions of the FEMA approval in **Exhibit 1** qualify as CEII because this document contains the express coordinates and physical addresses to power transmission and distribution facilities (18 C.F.R. § 388.113(iv)), and these specific coordinates and addresses could potentially be helpful to a person planning an attack on the energy facilities listed as part of this FEMA approval. The information identified as confidential in this paragraph is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that, on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of the FEMA approvals with CEII in **Exhibit 1** from disclosure, given the nature and scope of the details included in those portions of the Exhibit.

26. Based on the above, LUMA respectfully submits that portions of the FEMA approval should be designated as CEII. This designation is a reasonable and necessary measure to

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- (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or
 - (iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.
- (F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

⁶ CII includes the following types of information:

- (A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;
- (B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or
- (C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

protect the specific location of the energy facilities listed or discussed in the FEMA approval in **Exhibit 1**. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that these materials constitute CEII that should be maintained confidentially to safeguard their integrity and protect them from external threats.

C. Identification of Confidential Information

27. In compliance with the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009) below, find a table summarizing the portions of the FEMA approval for which we present this request for confidential treatment.

Document	Name	Pages in which Confidential Information is Found, if applicable	Summary of Legal Basis for Confidentiality Protection, if applicable	Date Filed
Exhibit 1	FAAST [Feeder Rebuild # 6601-03] (Distribution)	Pages 1-2, 10-12, 19, 21	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	January 14, 2025

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the copy of the FEMA approval attached herein as **Exhibit 1**; and **grant** the request for confidential treatment of **Exhibit 1**.

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, and through its counsel of record, Natalia Zayas Godoy, nzayas@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net, and Mirelis Valle Cancel, mvalle@gmlex.net, to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfr@sbgblaw.com, José J. Díaz Alonso, jdiaz@sbgblaw.com, and Francisco Santos, francisco-santos@genera-pr.com.

In San Juan, Puerto Rico, on this 14th day of January 2026.



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Exhibit 1

(public version, confidential version to be filed under seal of confidentiality)

Department of Homeland Security Federal Emergency Management Agency

General Info

Project #	801166	PW #	108082	Project Type	Specialized
Project Category	F - Utilities	Applicant	PR Electric Power Authority (000-UA2QU-00)		
Project Title	FAASt [Feeder Rebuild # 6601-03] (Distribution)			Event	4339DR-PR (4339DR)
Project Size	Large	Declaration Date	9/20/2017		
Activity Completion Date	9/20/2027	Incident Start Date	9/17/2017		
Process Step	Obligated	Incident End Date	11/15/2017		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #1492051; FAASt [Distribution Feeder Rebuild # 6601-03]

DDD for this facility codified in the 136271 - MEPA078 Puerto Rico Electrical Power Authority Island Wide FAASt Project.

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Distribution Feeder Rebuild # 6601-03
- **Facility Description:** The facility included: poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cable, underground cable systems, and fault interrupting equipment (fuses, reclosers, and sectionalizers).
- **Approx. Year Built:** 1980
- **Start GPS Latitude/Longitude:** [REDACTED]
- **End GPS Latitude/Longitude:** [REDACTED]

General Damage Information:

- **Date Damaged:** 9/20/2017
- **Cause of Damage:** High winds & wind driven rain, caused by Cat 4 Hurricane Maria

Final Scope

1492051 FAASt [Distribution Feeder Rebuild # 6601-03]

INTRODUCTION

Pursuant to FEMA's Post-Fixed Cost Estimate Obligation SOP (the "SOP") for FAASt projects, FAASt subrecipients must provide to FEMA recovery project scopes of work ("SOW") for the proposed construction work to be performed. The SOW may include § 406 hazard mitigation proposals ("HMPs"). The SOW defines the activities that will be performed using Public Assistance ("PA") funding.

According to the SOP, FEMA "anticipates that [SOW] submissions might include preliminary designs, including drawings and cost estimates. FEMA also recognizes that, generally, architects and/or engineers do not include or delineate the information needed to enable FEMA to complete programmatic reviews. Therefore, in those cases, subrecipients must ensure to submit all the information described [in the SOP] and not limit the submission to a drawing set. Refer to Part C - II. Recipient/Subrecipient Checklist for Submissions as a guide to review completeness." SOP at 4. This project's design is not 100% complete.

This document contains the detailed SOW for FEMA PA project 801166 Distribution Feeder Rebuild #6601-03 under DR-4339-PR Public Assistance. The document provides a detailed description of the project, scope of PA construction activities to be completed, common EHP review information, proposed hazard mitigation measures, and project cost estimates. LUMA is seeking approval from COR3 and FEMA for PA funding for the scope described in this document. LUMA submits this Detailed SOW pursuant to the Transmission and Distribution Operations and Maintenance Agreement between the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and LUMA, and in accordance with the Consent to Federal Funding Letter issued by PREPA and P3A, which collectively provides the necessary consent for LUMA, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the T&D System submitted to FEMA. References to "Subrecipient" herein refer to PREPA pursuant to this agreement and consent for LUMA to act as its agent with respect to federal funds.

PROJECT DESCRIPTION

Feeder 6601-03 supplies suburban and rural loads in the municipalities of Lajas. Feeder 6601-03 is approximately 7.32 circuit miles long with a three-phase overhead distribution conductor. It starts at Lajas substation (██████████). GPS Coordinates for the start and end point of the electrical feeder backbone (BB) project are noted in the table below. For more details, please refer to Appendix A – Location Map and Appendix B – Structural Pole Analysis for a list of all GPS locations to be impacted by this project. LUMA will remove and replace 255 poles along the feeder backbone. An additional 119 new poles will be installed within the easement, 24 poles will remain and will be modified, 44 poles will remain without modifications, and 2 poles will be removed and disposed. The total of poles is 444. The foregoing is detailed in Appendix B – Structural Pole Analysis, which includes the pole FIDs, coordinates, type of pole to be installed, type of pole and hardware to be removed, and whether it has a concrete foundation. As detailed in Section 9.1, eleven (11) poles were replaced in another program. Under this DSOW, however, such eleven poles will be modified, as explained below.

FACILITIES

Feeder Number	Feeder Name	Customers Counts	GPS Start	GPS End	Phase	Voltage Level (kV)	Construction Date
6601-03	Lajas 6601-03	2,483	██████████ ██████████	██████████ ██████████	3-Phase	7.20	More than 20 years

PROJECT AREA MAP WITH BOUNDARIES OF CONSTRUCTION

Please see the attached map identified at Appendix A – Location Map.

§ 428 SCOPE OF WORK

The proposed type of work for this project:

? Standard Project: Restores the facility/facilities to pre-disaster design and function to locally adopted codes/standards and/or FEMA-approved industry standards.

? Improved Project: Restores the pre-disaster function of the facilities and incorporates improvements or changes to its pre-disaster design not required by codes or standards.

? Subrecipient's request letter included, see Appendix ____.

? Recipient's approval letter included, see Appendix ____.

? Alternate Project: Does not restore the pre-disaster function of the damage facility. The

Subrecipient, through the Recipients, must obtain approval from FEMA.

? Subrecipient's request letter included, see Appendix ____.

? Recipient's approval letter included, see Appendix ____.

DESCRIPTION OF PROPOSED WORK TO BE PERFORMED

The tables below summarize the § 428 PA scope of work.

A. Poles

i. Remove and replace poles to comply with structure loading cases along the feeder

backbone. The pole quantities are described in the table below.

ii. Remove existing poles and hardware and replace with new poles and hardware.

iii. Depths of the poles to be erected are provided in Appendix H – Project Considerations . Depths vary from 6.5 to 8.8 feet.

iv. Remove halogen lighting on three (3)-phase primary poles and replace with a new LED luminaire. Transfer existing LED lighting to new poles. See Appendix B –

Structural Pole Analysis for information on pole FIDs, and coordinates of luminaire transfers.

v. Remove all distribution equipment including disconnect switches, fuse cutout, surge

arrester, crossarms, pole insulators, suspension insulators. Transfer the service drop and the secondary lines.

vi. Remove and dispose of the existing distribution line facilities with their related components.

vii. Work to be completed will be within the PREPA easement. Poles with easement encroachments are included as part of the engineering design.

Poles to be removed and replaced

Remove	Quantity	Replace With (§ 428 Standard)	Quantity
35' WOOD	4	Steel galvanized, 12-sided, tapered shaft, 40' S-5.7 (refer to line 97 of the LPCE)	4
40' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 40' S-5.7 (refer to line 97 of the LPCE)	1
30' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	1
35' WOOD	5	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	5
40' WOOD	5	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	5
40' STEEL	2	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	2
45' CONCRETE	3	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	3
45' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 45' S-5.7 (refer to line 98 of the LPCE)	1
30' WOOD	12	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	12
35' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	1
35' STEEL	2	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	2
35' WOOD	40	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	40
35' CONCRETE	4	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	4
40' WOOD	18	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	18

40' CONCRETE	2	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	2
40' STEEL	5	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	5
45' CONCRETE	5	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	5
45' WOOD	24	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	24
45' STEEL	14	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	14
50' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 50' S-8.5 (refer to line 99 of the LPCE)	1
35' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 50' S-10 (refer to line 100 of the LPCE)	1
30' WOOD	7	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	7
35' WOOD	17	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	17
35' CONCRETE	3	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	3
40' WOOD	4	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	4
40' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	1
45' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	1

45' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	1
45' CONCRETE	4	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	4
45' STEEL	6	Steel galvanized, 12-sided, tapered shaft, 55' S-8.5 (refer to line 101 of the LPCE)	6
35' WOOD	2	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	2

40' CONCRETE	3	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	3
45' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	1
45' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	1
50' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	1
50' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	1
55' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 60' S-8.5 (refer to line 102 of the LPCE)	1
30' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	1
35' WOOD	7	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	7
35' STEEL	2	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	2

40' WOOD	2	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	2
45' WOOD	3	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	3
45' CONCRETE	2	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	2
45' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	1
50' WOOD	2	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	2
50' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	1
55' CONCRETE	7	Steel galvanized, 12-sided, tapered shaft, 60' S-10 (refer to line 103 of the LPCE)	7

30' WOOD	2	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	2
35' WOOD	8	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	8
40' WOOD	3	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	3
45' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	1
45' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	1
50' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	1

55' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 60' S-13 (refer to line 104 of the LPCE)	1
35' WOOD	1	Steel galvanized, 12-sided, tapered shaft, 65' S-10 (refer to line 105 of the LPCE)	1
40' WOOD	2	Steel galvanized, 12-sided, tapered shaft, 65' S-10 (refer to line 105 of the LPCE)	2
40' CONCRETE	1	Steel galvanized, 12-sided, tapered shaft, 65' S-10 (refer to line 105 of the LPCE)	1
40' STEEL	1	Steel galvanized, 12-sided, tapered shaft, 65' S-10 (refer to line 105 of the LPCE)	1
Total			255

New poles to be installed

Description	Quantity (Ea.)
New electrical utility poles to be installed, steel galvanized, 12-sided, tapered shaft, 40' S-5.7	1 (refer to line 97 of LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 45' S-5.7	4 (refer to line 98 of the LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 50' S-8.5	54 (refer to line 99 of the LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 55' S-8.5	31 (refer to line 101 of the LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 60' S-8.5	8 (refer to line 102 of the LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 60' S-10	15 (refer to line 103 of the LPCE)
New electrical utility poles to be installed, steel galvanized, round, tapered shaft, 60' S-13	6 (refer to line 104 of the LPCE)
Total	119

Other poles

Description	Scope of Work	Quantity
Poles to remain, only modifications will be made.	Install insulators, down guys, anchors, fuses, span guys, reuse streetlight, reconductoring, framing and associated hardware. For specific work to be performed in each of these poles, refer to Appendix B – Structural Pole Analysis .	24

Poles to remain, no modifications will be made.	One located in private area, 16 to be left for secondary distribution line only.	17
Poles to remain, no modifications will be made.	De-energized, not be removed to preserve easement.	27
Poles to be disposed.	Remove.	2
Total		70

D-Pole Program

The poles and hardware listed in the table below were removed and replaced as part of D-Pole Program, FAASt Project 673775. This DSOW does not include scope or costs associated with that previously funded repair and replacement work. LUMA has reviewed and not identified work under the Hurricane Fiona emergency period that was performed for the FIDs listed in the table. The work to be performed under this DSOW is that included under the column "Scope of Work Under Project 801166," which work is to comply with LUMA distribution codes and standards and not duplicated in FAASt Project 673775. The work under the column "Scope of Work Under D-Pole and Conductor Repair" will be re-versioned in FAASt Project 673775 at a later date.

Pole FID	Installation Program	FAASt	Scope of Work Under D-Pole and Conductor Repair	Scope of Work Under Project 801166
10607087	D-Pole and Conductor Repair	673775	Pole replaced with 50FT S8 Galvanized Steel Pole, Cross arms, insulators and all associated hardware.	Insulator clamp needs to be adjusted to accommodate the bigger wire to comply with LUMA distribution codes and standards.
10607108	D-Pole and Conductor Repair	673775	Pole replaced with 50FT S8 Galvanized Steel Pole, Cross arms, insulators and all associated hardware.	Insulator clamp needs to be adjusted to accommodate the bigger wire to comply with LUMA distribution codes and standards.
5036654	D-Pole and Conductor Repair	673775	Pole replaced with 50FT S8 Galvanized Steel Pole, Cross arms, insulators and all associated hardware.	Insulator clamp needs to be adjusted to accommodate the bigger wire to comply with LUMA distribution codes and standards.
7367606	D-Pole and Conductor Repair	673775	Pole replaced with 50FT S8 Galvanized Steel Pole, Cross arms, insulators and all associated hardware.	Insulator clamp needs to be adjusted to accommodate the bigger wire to comply with LUMA distribution codes and standards.

7368167	D-Pole and Conductor Repair	673775	Pole replaced with 50FT S8 Galvanized Steel Pole, Cross arms, insulators and all associated hardware.	Insulator clamp needs to be adjusted to accommodate the bigger wire to comply with LUMA distribution codes and standards.
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Concrete Bases

i. Install new concrete foundation bases at locations provided in **Appendix H – Project Considerations** (see columns G, H and M). The table below summarizes the types of bases installed, their quantity, the volume of concrete per type of base and the total volume of concrete installed for all bases of a certain type.

ii.

Concrete Base Description	Volume of Concrete per Base (CY)	Quantity (Ea.)	Total (CY)
Precast Concrete Base for 50'-S8.5, 55'-S8.5, 60'-S8.5, and 65'-S8.5	3.35	63	211.05 (refer to line 93 of the LPCE)
Concrete Bases for 60'-S10, 60'-S13	6.11	26	158.86 (refer to line 94 of the LPCE)

Steel Galvanized Transformers

i. Remove existing transformers and replace with new stainless-steel units with their respective capacity. The transformer quantities are described in the table below.

ii. Transformers will be replaced with 50KVA, 75KVA, and 150KVA (Bank) transformers and will comply with current codes and standards for replacement and design.

Steel Galvanized Transformers	Interconnection Voltage	Quantity (Ea.)
25 KVA	2.4 – 4.16 KV	2 (refer to line 93 of the LPCE)
37.5 KVA	2.4 – 4.16 KV	50 (refer to line 94 of the LPCE)
50 KVA	2.4 – 4.16 KV	9 (refer to line 95 of the LPCE)
Total		61

Guy Wires / Anchoring

i. Install new guys and anchors in compliance with LUMA Overhead Electrical Distribution System available in Grants Portal - Applicant Event Profiles.

Description	Quantity (Ea.)
Guy Wires 1/2"	229 (refer to line 59 of the LPCE)

Overhead Ground Wires 1/2"	17 (refer to line 60 of the LPCE)
Expansion Anchor	36 (refer to line 61 of the LPCE)
Helix Type Anchor	2 (refer to line 62 of the LPCE)
Screw Type Anchor	141 (refer to line 63 of the LPCE)

Conductor

- i. Remove existing conductors and replace with new conductors per the LUMA specification. The conductor quantities are described in the table below.

Description	Quantity Wire Miles (W. Miles)
556 ACSR Conductor	0.53 (refer to line 107 of the LPCE)
652 MCM	6.57 (refer to line 106 of the LPCE)
750 MCM Conductor	0.30 (refer to line 120 of the LPCE)

Underground Construction

Trenching is to be performed within the existing 10' electrical easement at the locations identified in the table below.

Description	Location coordinates		Distance (ft)
First Segment from P15A to P17B	██████ ██████	██████ ██████	700' of duct bank of eight 6-inch conduit, for a total of 5,600' of conduit (refer to line 118 of the LPCE)
Second Segment from P226C to P254A	██████ ██████	██████ ██████	400' of duct bank of four 6-inch conduit, for a total of 1,600' of conduit (refer to line 118 of the LPCE)
Total Underground Lines			1,100' of trench (total of 7,200' of duct bank)

CODES & STANDARDS

Per FEMA's SOP, the locally adopted codes/standards and/or FEMA-approved industry standards used for this project are provided below:

1. LUMA Overhead Electrical Distribution System Manual, version 4.0, available in Grants Portal - Applicant Event Profiles.

COMMON EHP REVIEW INFORMATION

Please check any items applicable to the proposed scope of work in this Project. If an item is checked, provide a description of the scope extent and location of the selected activity.

? **Ground disturbance outside of existing footprint.** If checked, provide a description of the ground disturbing activities including the extent, location, and depth of the disturbance.

Poles, Concrete Bases and Underground Construction

Location and depth of poles and concrete bases to be installed are provided in **APPENDIX B – STRUCTURAL POLE ANALYSIS / APPENDIX H – PROJECT CONSIDERATIONS**.

Concrete Base Description	Diameter (in.)	Depth (ft.)
Precast Concrete Base for 50-S8.5, 55-S8.5, 60-S8.5, and 65-S8.5 (Column P in Appendix B)	40	14.5
Concrete Bases for 60'-S10, 60'-S13 (Column P in Appendix B)	48	16

Underground Construction

Description	Location coordinates		Depth from finish grade (in)	Width (in)	Length (ft)
First Segment from P15A to P17B			48"	30"	700'
Second Segment from P226C to P254A			48"	15"	400'

Underground Construction details are included on **Table F – Section 9.1**.

? **Soil testing or boring to be performed as part of pre-construction activities.** If checked, provide a description, location, and dimensions of the testing/boring activities.

? **Relocation of utilities.** If checked, include a description of the relocation including the type of utility, relocation coordinates, and the extent and depth of associated ground disturbance.

? **Vegetative Removal.** If checked, describe the removal work to be performed, its location, and its extent.

A. Vegetation clearance will be performed solely to the extent that it allows crews to conduct work and will be limited to a 10 ft radius surrounding the surface of the pole, but not to exceed the width of the right-of-way. This is for the exclusive purpose of gaining access to the pole to conduct repairs. The costs related to vegetation clearance procedures are covered in Project #727562 FAAS (Region 5 -Mayaguez Group C). The vegetation removal process will be managed in accordance with federal and state regulations. Please refer to **Appendix E – Debris & Vegetation Management** for details of specific locations where vegetation brushing is anticipated.

? **Demolition.** If checked, include a description of what will be removed and the extent and depth of any ground disturbing activities. Additionally, include a description of (1) demolition debris type (construction debris, white goods, hazardous materials, etc.); (2) GPS location of temporary debris storage sites; (3) final debris disposal location; and (4) final debris disposal method.

A. Material Disposal:

- Polychlorinated biphenyl (PCBs), oil from the transformer and breakers, sealants, and chemical waste will be disposed of by the contractor in authorized facilities.
- The types of debris generated in the process of removal are luminaires, pole arms, photocells, wiring, transformers, concrete, metal scrap, steel, wood, domestic and construction waste. The debris will be separated and taken to an authorized waste disposal facility.
- Photocells are considered universal waste and will be disposed of by the contractor in authorized facilities.

B. Transformer:

- i. Transformers will be contained and returned to LUMA in compliance with applicable federal and state regulations. The removal of transformers will require testing of the existing oil for PCB levels, draining of the oil, and delivery to the authorized waste disposal site.

? **Staging areas, landing area for air transport, and access roads.** If checked, provide GPS location of staging areas, and access roads. Include a description of the extent of any related vegetative removal, ground disturbance, or stabilization measures required (such as gabion walls, retaining walls, paving, etc.).

- The design is not 100% complete and only the optimal **staging areas** have been identified. Refer to **Appendix D – Staging Area**.

Staging Area	Line Number	Coordinates	Description	Parcel Number	New/ Existing	Temporary/ Permanent
1	6601-03	██████ ██████	Public property. Lot that provides fast access to #117 road./ Escuela Mario F. Pagán Irizarry, 117 Km 1.9 Bo La Plata, Lajas, Puerto Rico 00667 (14,000 m2)	358-034-144-01	New	Temporary
2	6601-03	██████ ██████	Private property. Undeveloped lot that provides fast access to #117 road. /BO Lajas Arriba , PR, Puerto Rico, 00667, Lajas (34,000 m2)	358-056-263-03	New	Temporary
3	6601-03	██████ ██████	Private property. Lot that provides fast access to #117 road. / BO Lajas Arriba CARR 117 KM 4.4, AGROCENTRO LA FE, PR, 00667, Lajas (61,000 m2)	358-000-009-03	New	Temporary
4	6601-03	██████ ██████	Private property. Undeveloped lot that provides fast access to #117 road. /BO Lajas Arriba , LOTE 2, PR, Puerto Rico, 00667, Lajas (1,400 m2)	359-000-006-96	New	Temporary
5	6601-03	██████ ██████	Private property. Lot that provides fast access to #117 road. /BO PLATA, PR, Puerto Rico, 00667, Lajas (27,000 m2)	359-084-303-05	New	Temporary
6	6601-03	██████ ██████	Public Property. Baseball field Encarnacion. Puerto Rico, 00667, Lajas (8,000 m2)	359-085-425-01	New	Temporary
7	6601-03	██████ ██████	Public property. Lot that provides fast access to #116 & #122 roads. 00667, Lajas (2,600 m2)	N/A	New	Temporary

Fill material. If the project includes the use of fill material, provide the source of the fill material including the provider's name and address (if known).

- Fill, gravel, and sand materials will be obtained from an approved supplier as referenced in LUMA Vendor Directory List included on the Applicant Event Profile in Grants Portal.

? **Work in water including coffer dams, dredging, placement of equipment in water, or other work in wetlands.** If checked, provide a description of the activities to be performed in water or wetlands.

The following items are generally intended for buildings:

? **Facility is over 45 years old.** If checked, provide a thorough description of materials to be used and method of repair, including cleaning methods. If substitute materials will be used in the restoration, specify whether they match the original color, texture, and design of the damaged facility.

? **Known renovations to the facility.** If checked, provide dates of any previous major renovations to the interior or exterior of the facility.

Photos of all sides of the facility are provided.

PROJECT COST ESTIMATE (PCE)

The estimated costs (compliant with Class 3 Accuracy +/-30%) to complete the project are summarized in the table(s) below. The cost estimate(s) was developed utilizing preliminary Architectural and Engineering design information. For a more detailed cost estimate refer to **Appendix F – LUMA LPCE**.

COST ESTIMATE			
Cost Element	428	406	PROJECT TOTAL
PLANNING	\$ 1,661,153.59	\$ -	\$ 1,661,153.59
(A&E) Permitting and Assessments	\$ 164,884.46	\$ -	\$ 164,884.46
(A&E) Environmental Documentation & Management	\$ 467,584.10	\$ -	\$ 467,584.10
(A&E) Engineering Services & Design	\$ 1,028,685.03	\$ -	\$ 1,028,685.03
MANAGEMENT	\$ 1,042,089.03	\$ -	\$ 1,042,089.03
(A&E) Design Development Project Management A&E	\$ 43,134.63	\$ -	\$ 43,134.63
(A&E) - Design Lodging & Per Diem A&E	\$ 20,277.50	\$ -	\$ 20,277.50
Project Management	\$ 244,429.59	\$ -	\$ 244,429.59
Construction Management	\$ 383,418.96	\$ -	\$ 383,418.96
Contracting, Procurement & Contract Administration	\$ 159,118.87	\$ -	\$ 159,118.87
Projects Controls (Scheduling, Estimating, Support, Cost Control, Risk, Document Control & Reporting)	\$ 191,709.48	\$ -	\$ 191,709.48
Mayagüez Short Term Group 3	\$ 20,003,162.17	\$ -	\$ 20,003,162.17
Mayagüez Short Term Group 3 Feeder 6603-01, FAAST#: 801166, material, labor and equipment.	\$ 16,654,996.52	\$ -	\$ 16,654,996.52
Start Up/Commissioning	\$ 249,824.94	\$ -	\$ 249,824.94
Construction Trespass	\$ 83,274.98	\$ -	\$ 83,274.98
Transportation Expenses	\$ 83,274.98	\$ -	\$ 83,274.98
Security (Field 24 hr)	\$ 149,894.96	\$ -	\$ 149,894.96
Insurance	\$ 336,430.92	\$ -	\$ 336,430.92
Contingency	\$ 1,870,336.42	\$ -	\$ 1,870,336.42

Escalation	\$ 575,128.45	\$ -	\$ 575,128.45
GENERAL CONDITIONS	\$ 980,782.53	\$ -	\$ 980,782.53
Sales Tax	\$ 148,032.71	\$ -	\$ 148,032.71
Municipal Construction Tax	\$ 832,749.82	\$ -	\$ 832,749.82
COST TOTALS	\$ 23,687,187.32	\$ -	\$ 23,687,187.32
DEDUCTIONS	TOTAL INSURANCE PROCEEDS RECEIVED		\$ -
	DE-OBLIGATION TO FAASSt IF APPLICABLE?		\$ -
FAASSt ALLOCATIONS			\$ 19,826,783.47
	FAASSt PROJECT # 801166 - 428		
			\$ -
	FAASSt PROJECT # 801166 - 406 HM		
			\$ 19,826,783.47
	FAASSt PROJECT # 801166 TOTAL:		
	FAASSt A&E # 335168 - 428		\$ 1,724,565.72
	FAASSt A&E # 335168 - 406 HM		\$ -
	FAASSt A&E # 335168 TOTAL		\$ 1,724,565.72
	FAASSt E&M #673691 - 428		\$ 2,135,838.13
	FAASSt E&M #673691 - 406 HM		\$ -
	FAASSt E&M #673691 TOTAL		\$ 2,135,838.13

Work to be completed: \$23,687,187.32

A&E Deduction (Global A&E FASSt #335168): -\$1,724,565.72

E&M Deduction (FASSt #673691): -\$2,135,838.13

Project Total Cost (FASSt Project #801166): \$19,826,783.47

Project Notes:

1. A&E cost included in this project will be reduced from this project and obligated under the FAASSt Project #335168, A&E, as show in in the table above. The A&E project was obligated to track and account for costs associated with individual FAASSt projects.
2. Equipment and material costs included in this project will be reduced from this project and obligated under FAASSt Project #673691, Equipment and Materials, as shown in the table above. Only the base cost of equipment and/or material will be reduced from this project (not labor). All costs associated with Planning, Management, General Conditions, and Contingencies will remain in this project.
3. This project is part of 136271 - MEPA 078 Puerto Rico Electrical Power Authority Island Wide FAASSt Project.
4. For detailed cost estimate please refer to document: 801166 - DR4339PR -FEEDER 6601-03- APPENDIX F - LUMA LPCE Rev. 4.xlsx.
5. For detailed SOW please refer to document: 801166-DR4339PR-FEEDER 6601-03-DSOW Feeder Rebuild 6601-03-Rev. 4.pdf.
6. For detailed EHP RFI Request Responses, refer to document: 801166-DR4339PR-Feeder Rebuild 6601-03-RFI Response Rev.3.doc

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ATTACHMENTS/APPENDICES

The following attachments and appendices are provided with this DSOW:

Appendix	Document Description or Filename	
A	Location Map	
B	Structural Pole Analysis	
C	LUMA Drawings OH Design	
D	Staging Area	
E	Debris and Vegetation Management	
F	LUMA LPCE	
G	Proposed Design KMZ	
H	Project Considerations	

406 HMP Scope

406 Hazard Mitigation measures were not requested by the sub-applicant for this project in this Version. However, there may be mitigation opportunities that might apply to Version 1 of the Permanent Work Project. The project is ready for Insurance completion.

Cost

Code	Quantity	Unit	Total Cost	Section
9001 (9001- Equipment & Material Deduction (PREPA FASST Global E&M 673691)	1.00	Lump Sum	(\$2,135,838.13)	Uncompleted
3510 (v0 Engineering And Design Services: Deduction - PREPA FASST Global A&E 335168)	1.00	Lump Sum	(\$1,724,565.72)	Uncompleted
9201 (PAAP Fixed Estimate (No Value - Tracking Purposes Only))	1.00	Lump Sum	\$0.00	Completed
9001 (9001 (Contract V0 PREPA FASST Project 136271 - Work to be completed (WTBC)))	1.00	Lump Sum	\$23,687,187.32	Uncompleted

CRC Gross Cost \$19,826,783.47

Total 406 HMP Cost \$0.00

Total Insurance Reductions \$0.00

CRC Net Cost \$19,826,783.47

Federal Share (90.00%) \$17,844,105.13

Non-Federal Share (10.00%) \$1,982,678.34

Award Information

Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
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Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	1/8/2026	\$17,844,105.13	90%	Accepted	4339DRPRP01080821

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding \$5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- The Subrecipient provided the estimate for this PW. FEMA validated the estimate and found it to be reasonable for the work to be performed.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.

Insurance

Additional Information

9/8/2025

GENERAL INFORMATION

Event: DR4339-PR

Project: SP 801166

Category of Work: Cat F - Utilities

Applicant: PR Electric Power Authority

Event Type: Hurricane / Hurricane Maria

Cause of Loss: Wind / Wind Driven Rain

Incident Period: 9/17/2017 to 11/15/2017

COMMERCIAL INSURANCE INFORMATION

Does the applicant have a Commercial Policy that extends coverage for this facility: Yes

Policies Issued by: Willis Towers Watson, Multinational Insurance Company and Mapfre

Policy Numbers: Willis Towers Watson (B0804Q1966F17, B0804Q14312F17, B0804Q19673F17, B0804Q19672F17, B0804Q18529F17, B0804Q14312F17, B0804Q19674F17, B0804Q18411F17, B0804Q14310F17, B0804Q11038F17, B0804Q14507F17, B0804Q14312F17)

Mapfre Praico Insurance Company (1398178000644)

Multinational Insurance Company (88-CP-000307831-2, 88-CP-000318673-0, 88-CP000318674-0, 88-CP-000318675-0, 88-CP-000318676-0, 88-CP-000318677-0)

Policy Period: From: 5/15/2017 To: 5/15/2018

Policy Limits: \$300,000,000.00

RCV or ACV: Replacement Cost Value

Deductible Amount \$25,000,000.00 each and every occurrence property damage and 30 days each and every occurrence business interruption in respect of Named Windstorm

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No

NUMBER OF DAMAGED LOCATIONS INCLUDED IN THIS PROJECT: (1)

Damaged Inventory (DI) #1492051:

FAAST [Distribution Feeder Rebuild # 6601-03]

Location: Distribution Feeder Rebuild # 6601-03

GPS Coordinates: [REDACTED]

Cause of Loss: Wind / Wind Driven Rain

Prior Obtain and Maintain Requirement:

No prior insurance requirements were found for this facility.

Reduction(s):

No insurance reduction will be applied to this project as coverage is not anticipated. An anticipated insurance reduction of \$193,746,436.00 was applied to FAAST project #136271 for anticipated insurance proceeds for Hurricane Maria losses. For ease of reference, please see table of insurance allocations: "PREPA Allocation Plan – All Disasters" file.

Obtain and Maintain Requirement:

No Obtain & Maintain Requirement is being mandated for the FAAST [Distribution Feeder Rebuild # 6601-03] because the facility does not meet the definition of building, equipment, contents, or vehicle.

Insurance Proceeds Statement:

FEMA acknowledges that the Applicant is in negotiations with their insurance carrier at the time of the FEMA insurance review and might have received partial settlements. In accordance with 44 CFR §206.250-253, in the absence of an actual settlement, anticipated insurance recoveries will be deducted from this project based on Applicant's insurance policy limits. FEMA subsequently adjusts the eligible costs based on the actual amount of insurance proceeds the Applicant receives after a final settlement.

FEMA's Recovery Policy FP 206-086-1, Public Assistance Policy on Insurance (June 29, 2015), requires applicants to take reasonable efforts to recover insurance proceeds that it is entitled to receive from its insurers. FEMA will consider final insurance settlements that may be less than the insurance policy limits when an applicant demonstrates that it has taken reasonable efforts to recover insurance proceeds that it is entitled on a case-by-case basis.

Standard Insurance Comments

FEMA Policy 206-086-1

PART 2: Other Insurance-Related Provisions. (Sections 312 and 406(d) of the Stafford Act)

A. Duplication of Benefits. FEMA cannot provide assistance for disaster-related losses that duplicate benefits available to an applicant from another source, including insurance.

1. Before FEMA approves assistance for a property, an applicant must provide FEMA with information about any actual or anticipated insurance settlement or recovery it is entitled to for that property.
2. FEMA will reduce assistance to an applicant by the amount of its actual or anticipated insurance proceeds.
3. Applicants must take reasonable efforts to recover insurance proceeds that they are entitled to receive from their insurer(s).
- ...
5. If an applicant has an insurance requirement from a previous event:

- a. FEMA will reduce assistance by the actual or anticipated insurance proceeds, or the amount of insurance required in the previous disaster, whichever is greater.
- b. FEMA will only consider insolvent insurers, legal fees, or apportionment of proceeds as described in Section VII, Part 2(A)(3) and (4) when the applicant's anticipated or actual insurance proceeds are higher than the amount of insurance required in the previous disaster.

Jorge Parrilla, PA Insurance Specialist

CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Feeder Rebuild # 6601-03] (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Feeder Rebuild # 6601-03] (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders?

Yes

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- a. The Subrecipient and/or Subrecipient's contractor shall follow the Low Impact Debris Removal Stipulations (LIDRS) as stated in Appendix E of the Project-Specific Programmatic Agreement Among FEMA, the SHPO, ACHP, COR3, and PREPA (PSPA), executed on August 2, 2022. b. Unexpected Discoveries: Pursuant to Stipulation III.B of the PSPA, if, in the course of implementing this Individual Undertaking(s), previously unidentified structures, sites, buildings, objects, districts, or archaeological deposits, that may be eligible for listing in the National Register, or human remains are uncovered, or if it appears that an Individual Undertaking has affected or will affect a previously identified historic property in an unanticipated manner, the contractor must notify Subrecipient who will immediately notify the Recipient. Work must

stop in the vicinity of the discovery and measures must be taken to protect the discovery and avoid additional harm. c. Additional staging areas and/or work pads within work site area haven't been identified yet. The Recipient/Subrecipient and/or private operator must provide the information of any additional staging areas or work pads for EHP evaluation as soon as available specially if any construction activity will be necessary to prepare the site(s). Information for staging areas and/or work pads confined to previously disturbed or hardened surfaces can be provided at close-out. d. All borrow or fill material must come from pre-existing stockpiles, material reclaimed from maintained roadside ditches (provided the designed width or depth of the ditch is not increased), or commercially procured material from a source existing prior to the event. For any FEMA-funded project requiring the use of a non-commercial source, or a commercial source that was not permitted to operate prior to the event (e.g., a new pit, agricultural fields, road ROWs, etc.) in whole or in part, regardless of cost, the Applicant must notify FEMA and the Recipient prior to extracting material. FEMA must review the source for compliance with all applicable federal environmental planning and historic preservation laws and executive orders prior to a Sub-recipient or their contractor beginning borrow extraction. Consultation and regulatory permitting may be required. Non-compliance with this requirement may jeopardize receipt of federal funding. Documentation of borrow sources utilized is required at close-out and must include fill type (private, commercial, etc.), name, fill site GPS coordinates (not of the company/governmental office), address, and type of material.

- Endangered Species Act (ESA) Conditions for the Puerto Rican Boa (*Chilabothrus inornatus*) for Feeder 6601-03; First Trench (start: [REDACTED]; end: [REDACTED]); and Second Trench (start: [REDACTED]; end: [REDACTED]). a. Inform all project personnel about the potential presence of the PR boa in areas where the proposed work will be conducted. A pre-construction meeting should be conducted to inform all project personnel about the need to avoid harming the species as well as penalties for harassing or harming PR boas. An educational poster or sign with photo or illustration of the species should be displayed at the project site. b. Prior to any construction activity, including removal of vegetation and earth movements, the boundaries of the project and areas to be excluded and protected should be clearly marked in the project plan and in the field in order to avoid further habitat degradation into forested and conservation areas. c. Once areas are clearly marked, and prior to the use of heavy machinery and any construction activity (including removal of vegetation and earth movement), a biologist or project personnel with experience on this species should survey the areas to be cleared to verify the presence of any PR boa within the work area. d. If a PR boa is found within any of the working or construction areas, activities should stop at that area and information recorded (see #e). Do not capture the boa. If boas need to be moved out of harm's way, designated personnel shall immediately contact the Puerto Rico Department of Natural and Environmental Resources (PRDNER) Rangers for safe capture and relocation of the animal: (787) 999-2200 ext. 2911. If immediate relocation is not an option, project-related activities at that area must stop until the boa moves out of harm's way on its own. Activities at other work sites, where no boas have been found after surveying the area, may continue.
- e. For all boa sightings (dead or alive), record the time and date of the sighting and the specific location where it was found. PR boa data should also include a photo of the animal (dead or alive), site GPS coordinates, the time and date, and comments on how the animal was detected and its behavior. f. If a PR boa is captured by PRDNER personnel, record the name of that person and information on where the PR boa will be taken. This information should be reported to the Service. g. Measures should be taken to avoid and minimize PR boa casualties by heavy machinery or motor vehicles being used on site. Any heavy machinery left on site (staging) or near potential PR boa habitat (within 50 meters of potential boa habitat), needs to be thoroughly inspected each morning before work starts to ensure that no boas have sheltered within engine compartments or other areas of the equipment. If PR boas are found within vehicles or equipment, do not capture the animal, and let it move on its own or call PRDNER Rangers for safe capture and relocation of the animal (see #d). If not possible, the animal should be left alone until it leaves the vehicle on its own. h. PR boas may seek shelter in debris piles. Measures should be taken to avoid and minimize boa casualties associated with sheltering in debris piles as a result of project activities. Debris piles should be placed far away from forested areas. Prior to moving, disposing or shredding, debris piles should be carefully inspected for the presence of boas. If debris piles will be left on site, we recommend they be placed in areas that will not be disturbed in the future. i. If a dead PR boa is found, immediately cease all work in that area and record the information accordingly (see #e). If the PR boa was accidentally killed as part of the project actions, please include information on what conservation measures had been implemented and what actions will be taken to avoid further killings. A dead boa report should be sent by email to the Service at Caribbean_es@fws.gov, within 48 hours of the event. j. Projects must comply with all state laws and regulations. Please contact the PRDNER for further guidance.
- Endangered Species Act (ESA). The below conservation measures apply to the following species: (*Antrostomus noctitherus* [Puerto Rican Nightjar - Guabairo]) for Feeder 6601-03. a. All personnel will be advised that there are civil and criminal penalties for harming, harassing, or killing species protected under the ESA. During breeding seasons (see below), nest surveys shall be conducted if a project occurs within the range of any of the species listed above and if habitat for those species will be impacted by the proposed actions. Nest searches must be conducted by qualified personnel with the appropriate permits from the Puerto Rico Department of Natural and Environmental Resources (PRDNER) prior to start of work. If nesting activity is detected, all construction activities or human disturbance must be avoided within a 50-meter buffer around any nest(s) found within the project area. This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Outside breeding season no nest surveys are required. However, some bird species may nest year-round, therefore, if a nest is encountered while the project is being conducted, all construction activities or human disturbance must be avoided within a 50-meter buffer around that nest(s). This avoidance strategy must be kept until fledglings successfully leave the nest(s) permanently. Furthermore, if any of the species indicated above is observed (e.g., foraging, resting) within the project area, avoid any disturbance to the individual(s) and do not flush the bird until it leaves on its own. Nesting seasons: *. Puerto Rican nightjar: February-August. For all nest sightings, the Applicant must record the time and date of the sighting and the specific location where it was found. All sightings and incidental lethal take reports should be sent to the USFWS Caribbean Ecological Services Field Office at Caribbean_es@fws.gov. Office phone: 786-244-0081.
- The Sub-recipient must provide documentation at close-out that proves completion of required Conservation Measures.
- Clean Water Act Condition for Feeder 6601-03: The Applicant shall comply with one of the following conditions including any coordination (emails, letters, documented calls) pertaining to these compliance activities must be documented and maintained in the Applicant's permanent files.
- -The Applicant shall handle, manage, and dispose of all types of hazardous waste in accordance with requirements of local, state, and federal laws, regulations, and ordinances. In addition, the Applicant shall ensure that all debris is separated and disposed of in a manner consistent with the PR DNER guidelines at a permitted site or landfill. The contractor/applicant will be responsible for the proper disposition of construction debris in authorized landfills providing the name, location, coordinates and permits of the facility to the corresponding authorities. -The applicant is responsible to ensure damaged transformers are handled, managed, and disposed of in accordance with all

federal and state laws and requirements. Downed electrical equipment may contain toxic and hazardous materials, such as polychlorinated biphenyls (PCBs), and may spill these materials if a rupture occurs. Applicant is responsible for screening transformers that do or may contain PCBs and the area where any related spill occurred. The applicant is then responsible to handle, manage, dispose of, or recycle damaged equipment and contaminated soil as appropriate. Where possible, temporary measures should be implemented to prevent, treat, or contain further releases or mitigate the migration of PCBs into the environment. If damaged equipment or material storage containers must be stored temporarily, containers should be placed on hardened surface areas, such as a concrete or an asphalt for no more than 90 days. Excavated contaminated material should be disposed of in accordance with federal and state laws and requirements. -Unusable equipment, debris, white goods, scrap metal any other material shall be disposed in approved manner and location. In the event significant items are discovered during the implementation or development of the project the Applicant shall handle, manage, and dispose petroleum products, hazardous materials, and toxic waste in accordance with the requirements of the local and federal agencies. Noncompliance with these requirements may jeopardize receipt of federal funds.

- Floodplain condition for Feeder 6601-03: Applicant must obtain any required permits from the Puerto Rico Permits Management Office (OGPe) prior to initiating work and comply with any conditions of the permit established by the Planning Board (JP) for constructions in floodplains. All coordination (emails, letters, documented phone calls) pertaining to these activities and compliance must be provided and maintained in the Applicant's permanent files.

EHP Additional Info

There is no additional environmental historical preservation on **FAAST [Feeder Rebuild # 6601-03] (Distribution)**.

Final Reviews

Final Review

Reviewed By LEFRANC-GARCIA, CARLOS L.

Reviewed On 12/30/2025 10:14 AM EST

Review Comments

Project has been reviewed, found eligible and reasonable. Subrecipient is responsible for complying with all grants and subgrant conditions. - CLG 12/30/2025

Recipient Review

Reviewed By Mulero, Noel

Reviewed On 12/31/2025 8:18 AM EST

Review Comments

Recipient review completed. Applicant must ensure to compliance with all regulatory requirements, Record of Environmental Consideration (REC) Special Conditions and PA policy. Project is ready for applicant review.

Fixed Cost Offer

As a Public Assistance (PA) Subrecipient PR Electric Power Authority (000-UA2QU-00), in accordance with Section 428 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, the Applicant agrees to accept a permanent work subaward based on a Fixed Cost Offer in the amount of \$19,826,783.47 for subaward number 108082 under Disaster # 4339. The Applicant accepts responsibility for all costs above the Fixed Cost Offer.

The Applicant understands that by participating in this pilot program they will be reimbursed for allowable costs in accordance with 2 CFR Part 200, and the reimbursement will not exceed the Fixed Cost Offer. The Applicant also understands that by agreeing to this Fixed Cost Offer, they will not receive additional funding related to the facilities or sites included in the subaward. The Applicant also acknowledges that failure to comply with the requirements of applicable laws and regulations governing assistance provided by FEMA and the PA Alternative Procedures Pilot Program Guidance (such as procurement and contracting; environmental and historic preservation compliance; and audit and financial accountability) may lead to loss of federal funding.

Project Signatures

Signed By Miller, Thomas

Signed On 01/02/2026