

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

NEPR

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IN RE: PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED
ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

**SUBJECT: Motion to Submit December 2025
Monthly Collaborative Report in Compliance with
Resolution and Order of March 28, 2025**

**MOTION TO SUBMIT DECEMBER 2025 MONTHLY COLLABORATIVE REPORT IN
COMPLIANCE WITH RESOLUTION AND ORDER OF MARCH 28, 2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy Servco, LLC** (“ServCo”) (jointly referred to as “LUMA”), through the undersigned counsel, and respectfully state and request the following:

1. On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“March 28th Resolution”) in which it ordered that, starting on April 27, 2025, LUMA, Genera and PREPA provide a monthly status report of the activities established in the Electrical System Priority Stabilization Plan approved by the Energy Bureau therein. *See* March 28th Resolution, p. 11. The Energy Bureau further directed that LUMA file these status reports as one (1) collaborative report, which should include, but not be limited to, a detailed discussion of each activity’s progress and any potential implementation issues and proactive solutions to the same (“Collaborative Report”). *Id.*

2. On August 29, 2025, the Energy Bureau issued a Resolution and Order (“August 29th Order”) in Case No. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority’s 10-Year Infrastructure Plan – December 2020* (“Federal Funding Docket”) in which

it determined to allow LUMA to file the monthly report on the status of 4 x 25 MW Utility-Scale BESS Project submitted in the Federal Funding Docket as part of the Monthly Collaborative Report in the present docket, as to avoid preparation of two separate reports. *See* August 29th Order in the Federal Funding Docket, p. 1.

3. In compliance with the March 28th Order, LUMA hereby submits, as *Exhibit 1*, the Collaborative Report for December 2025 (“The Monthly Report”), outlining the key activities and progress achieved by LUMA, PREPA, and Genera for the Electric System Priority Stabilization Plan. Pursuant to the August 29th Order in the Federal Funding Docket, LUMA also submits, as *Exhibit 2*, the monthly report on the status of the 4 x 25 MW Utility-Scale BESS Project.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** *Exhibit 1* as the monthly status report required by the March 28th Order; **accept** *Exhibit 2* as part of the monthly report outlining the status of activities for the 4 x 25 MW Utility-Scale BESS project; and **deem** LUMA, Genera and PREPA in compliance with the March 28th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of December 2025.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified via email to PREPA, via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record Mirelis Valle Cancel, mvalle@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net and Natalia Zayas Godoy, nzayas@gmlex.net, and to Genera PR LLC, through its counsel of record Luis R. Roman-Negron, lrn@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com.



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Exhibit 1

LUMA, Genera and PREPA's December 2025 Monthly Report on the Progress of the Electric System Priority Stabilization Plan

Monthly Report on the Progress of the Electric System Priority Stabilization Plan

NEPR-MI-2024-0005

December 29, 2025

LUMA

Progress of the Electric System Priority Stabilization Plan

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1.0 Introduction

In accordance with the Resolution and Order dated March 28, 2025 (“March 28th Resolution”) issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2024-0005. In Re: Electric System Priority Stabilization Plan, LUMA, the Puerto Rico Electric Power Authority (PREPA) and Genera PR, LLC (Genera) are required to provide a monthly status report regarding the stabilization activities set forth in the Electric System Priority Stabilization Plan (PSP) approved therein. LUMA is tasked with filing these reports as a collaborative report. In compliance with the March 28th Resolution, this report outlines the key activities and progress achieved by LUMA, PREPA, and Genera for the PSP. The PREB established additional requirements for this report in a Resolution and Order dated July 16, 2025 (“July 16th Resolution”), which are to be addressed by each LUMA, PREPA and Genera separately.

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2.0 LUMA's Stabilization Activities

In compliance with the PREB's March 28th Resolution, this section outlines the key activities and progress achieved by LUMA for the PSP. LUMA also addresses the applicable information requirements set forth in the July 16th Resolution.

Targeted Vegetation Management Program

Due to cashflow constraints, the Vegetation department implemented cost-control measures in October and November. These measures resulted in a reduction in the contractor vegetation workforce on activities related to the operations and maintenance (O&M) side of vegetation management.

During this period, vegetation management efforts were limited to reactive and corrective maintenance. Preventative maintenance activities were temporarily suspended to prioritize critical system needs and optimize available resources.

Effective in December preventative maintenance activities were restarted. The Vegetation Management team began a slow ramp up starting December 1 to focus work back on the PSP and continue maintenance of 230 kV and 115 kV lines. Work will be prioritized on lines included in the Department of Energy 202(c) emergency order. Assuming continued funding, normal contractor staffing levels should be attained by February, along with continued ramp-up to meet the needs with the provisional rate funds.

Complete Transmission Line Hardening & Maintenance

During the month of November, corrective maintenance was performed on several transmission lines. The work completed is summarized below:

- Line 1600 (Leon Sect – Acacias TC): Insulation replacement
- Line 2000 (Once De Agosto Sect – San Sebastian TC): Insulation replacement
- Line 2200 (Factor Sect – Barceloneta TC): Insulation replacement
- Line 1900 (Dos Bocas HP – San Sebastián TC): Hot spot repairs
- Line 5900 (San Juan SP – Crematorio TO): Switch repair

Work Completed on the Identified 51 Segments		
Work Completed	November 2025	Year To Date
Insulation & Hardware Replacement	32	106
Hot Spots Repairs	3	18
Switch Repairs	1	10
Switch Replacement	0	2
Pole Replacement	0	6

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Work Completed on the Identified 51 Segments		
Inspections	1	33

"ASAP" Utility-Scale Battery Energy Storage System

- On November 3rd, LUMA submitted a motion to inform PREB about four Phase 2 proponents that indicated they would accept the Standard Offer 1 (SO1) Agreement without reservations and requested five days to complete the verification of the SO1 Agreement drafts for completeness. The PREB approved these four agreements on November 13th and ordered LUMA to finalize the agreements and send them to PREPA for approval. On November 20th, LUMA sent the four SO1 Phase 2 contracts to PREPA with a letter requesting their review and approval.
- In total, 10 SO1 agreements have been approved by the PREB, totaling 594.4 MW of battery energy storage system (BESS). One Resource Provider has already submitted all signing conditions and will be ready for PREPA execution after resolving a request for information (RFI) from the Financial Oversight and Management Board (FOMB). Three participants are in the process of completing the signing conditions before PREPA execution. The remaining six are awaiting PREPA and FOMB approval before execution.
- Four of the six SO1 participants have provided feedback on the most recent version distributed to all SO1 participants (v3). Continued collaboration with SO1 participants is focused on resolving outstanding Agreed Operating Procedures (AOP) items and further refining select procedures. Feedback is being documented in AOP Preliminary Draft v4, with only a limited number of procedures still requiring finalization
- System Impact studies are expected to begin in December, pending the completion of the respective RFIs by the developers. Although LUMA will provide support needed to complete the signing conditions of the four approved SO1 Phase 1 projects, the responsibility for this task is primarily in the hands of PREPA and the developers currently.

Install 4x25 MW Utility-Scale BESS

Please refer to Exhibit 2.¹

Dynamic Stability Study and Frequency Control Implementation

LUMA has successfully replicated several past events involving the underfrequency load shedding scheme (UFLS) in the simulation tool Power System Simulator for Engineering (PSSE) used to perform

¹ On August 29, 2025, the Energy Bureau issued a Resolution and Order ("August 29th Order") in Case No. NEPR-MI-2021-0002, *In Re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan – December 2020* ("Federal Funding Docket") in which it allowed LUMA to file the monthly report on the status of 4 x 25 MW Utility-Scale BESS Project submitted in the Federal Funding Docket as part of the Monthly Collaborative Report in the present docket, as to avoid preparation of two separate reports. See August 29th Order in the Federal Funding Docket, p. 1. LUMA is submitting, as *Exhibit 2*, the monthly report on the status of the 4 x 25 MW Utility-Scale BESS project.

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transmission studies, to assess the model performance in comparison with the actual field performance. LUMA is engaged with the DOE's National Laboratories to review and jointly develop its updated UFLS scheme.

The automatic under frequency load shedding schemes implemented via distribution circuit, substation, and breaker relays have been compared with the model simulation tools to identify discrepancies and develop corrective actions to verify the field settings of relays required to perform UFLS. As part of the review and corrective actions, LUMA has identified components and relays requiring troubleshooting or replacement as described in the UFLS section of this document. LUMA has completed the following actions:

- Developed an overall table with different frequency blocks and expected protection performance. The expected behavior was compared with actual performance during recorded events.
- Aligned UFLS relay load blocks (how much load is planned to be shed at each frequency block) as set in substations with the simulation representation in the PSSE model.
- Developed a program design document to align on the planned performance required from the UFLS scheme.

Revised the time-load relationships required to improve UFLS scheme performance consistent with the Electric Power Research Institute (EPRI) recommendations from June 14, 2024, event report. In July 2025, LUMA sent an RFI to generators, and coordinated with Genera and generator owners/operators on a plan and schedule for third-party services to perform generator testing. The deliverables requested in the RFI include a report documenting equipment, configuration and model parameters for each site that provides verified generator parameters, time constants, gains and controls "as-is" settings, and the PSSE dynamic model representation of each unit. LUMA sent the RFI to the generators in the first week of July 2025.

LUMA has incorporated the Generation Dynamic Model from EcoEléctrica into the PSSE model and engaged with leadership from Genera and AES to define the path forward for unit testing and model development. These discussions have emphasized collaboration and the need to address funding challenges to advance testing activities. While progress continues, all generator operators have expressed concerns regarding costs and potential unintended impacts to their units, which remain key barriers requiring resolution.

Grid Protection & Control Upgrade Program

Wide Area Protection Coordination Study:

- **230 kV line protection:** All studies have been completed. The implementation is 89% complete. Two transmission lines, lines 50900 between Aguirre SP and Aguas Buenas GIS, and 51000 between Aguas Buenas GIS and Sabana Llana, are pending implementation. Line 50900 will be implemented during the planned Protection, Automation and Control (PAC) system upgrade at Aguirre SP.
- **115 kV line protection:** All the studies have been completed. 25% of the work order packages (WOPs) have been issued. Three lines have been implemented to date.

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- 38 kV line protection studies:** Model validation has been completed. 4% of the WOPs have been issued. Initial studies are focusing on areas surrounding upcoming projects, beginning with projects at Cataño, Covadonga and six stations targeted for gas insulated switchgear (GIS) installations (Llorens Torres, Centro Medico, Tapia, Taft, Rio Grande Estates, and Flamenco). The Cataño recommendations for the 38 kV were submitted by June 2025 and new relay settings issued by October 2025.

Underfrequency Load Shedding Scheme:

- The PAC project includes remediations to the existing program to improve performance. Performance improvement studies and recommendations are being developed for the UFLS program by System Planning. Once the study recommendations become available, PAC will include them in the actions.
- Work is being conducted through Non-Federal Capital (NFC) budget to expedite progress. Those portions that may be eligible for federal funding will be submitted as federally funded work is completed accordingly.

Underfrequency Load Shedding Scheme Improvements				
Item	Planned	In Progress	Completed	Comments
Relay replacement	8	-	4	Pending four replacements included in United States Department of Energy (DOE) initiative to be completed by Dec 2025.
Settings update	12	-	16	The Initial 12 work order packages completed. Four more additions based on field assessments. These four were issued.
Field Assessment	70	-	70	50 substations included in DOE initiative. All visits completed.
Total	90	-	89	

Remote Terminal Unit (RTU) Replacements:

- There are 192 RTU replacements identified.
 - 169 will be executed under the FEMA in four groups (four unique obligations).
 - 23 will be executed with NFC funds, to be completed in three separate fiscal years (FYs). Schedules are subject to change due to funding.
- We have found a mouse infestation in one of the two RTU replacements previously reported as in progress under FEMA Group 1, and the work is on hold again.

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RTU Replacements				
Group	Planned	In Progress	Energized	Status
FEMA Group 1	22	1	20	One RTU replacement is still in progress. One RTU replacement was put on hold because of a mouse infestation.
FEMA Group 2	28	28	0	Pending FEMA obligation. Engineering is completed.
FEMA Group 3	103	0	0	FEMA Project has been withdrawn- Priority changed
FEMA Group 4	16	0	0	Pending Scope of Work. Will be part of substation component replacement.
NFC FY2025	6	-	6	Completed.
NFC FY2026	10	0	3	RTU Replacements under DOE initiative have been completed. Pending funding availability for the remaining seven.
NFC FY2027	7	0	0	
Total	192	30	29	

Commence Priority Substation Rehabilitation/Rebuild Projects (Phase 1)

Completed:

- Bayamón TC Autotransformer 230/115 kV: Energized in July 2024
- Hato Rey TC 115/13.2 kV 44MVA transformer: Energized in November 2024
- Santa Isabel TC - 115/13.2 kV 56MVA transformer: Energized in November 2024
- Monacillos TC 115/13.2 kV 1346 transformer: Energized in September 2025
- Caguas TC Bank 1 115/38 kV Transformer: Energized in October 2025
- Monacillos TC 115/38 kV Bank 1 Transformer: Energized on December 2025.
- Monacillos TC 115/38 kV Bank 3 Transformer: Energized on December 2025.

In Progress:

- Sabana Llana TC Autotransformer 2 230/115 kV: Transformer arrived on-island. Transformer was moved into substation in November 2025. Remains on track for January 2026 energization.

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- Costa Sur Autotransformer 1 230/115 kV: Transformer Factory Acceptance Test scheduled for December 2025, date change due to factory request. Transformer delivery to the island is expected by March 2026 with energization in June 2026.
- Bayamón TC transformer 115/38 kV: Energization scheduled for January 2026.
- Factor Sectionalizer 38/13.2 kV transformer: Energization scheduled for March 2026.
- Llorens Torres Metalclad replacement: Energization moved to June 2026 as we are awaiting issuance of the DOE award to finalize the procurement with the Metalclad vendor.
- Covadonga GIS Switchgear: Energization moved to February 2026 due to additional outages required to safely work on the GIS.
- Guánica TC 115/38 kV Transformer replacement: Site specific Health and Safety Plan submitted to EPA and is under review. Transformer arrival to island expected by June 2026 with energization expected by Q4 FY2026.
- Maunabo TC 115/38 kV transformer: Transformer arrived on island in October 2025 and is at San Juan Port. Energization scheduled for February 2026.
- Fajardo Pueblo 2002 transformer replacement: Energization scheduled for January 2025.

Complete Interconnection of Approved Independent Power Producer (IPP) Utility Scale LUMA Renewable Capacity Addition Solar Generation and Energy Storage

- Non- Request for Proposals (RFP) project Ciro 1: Salinas Sectionalizer 95% construction complete (Projects interconnecting Ciro One and AES-CFE Salinas Solar and BESS).
- Tranche 1 project Yabucoa Solar (IPP: Infinigen): 90% Design received. LUMA is addressing the A&E discrepancies with the 60% Design previously approved.
- Tranche 1 project: IPP Convergent - Peñuelas Energy Storage NTP to EPC scheduled for December 30, 2025.
- Tranche 1 projects that have not issued Notices to Proceed (NTP) from IPPs: Guayama Solar (IPP Putman) and Tetris Power (IPP Yarotek): IPPs have communicated that the new tentative date is under internal revision by them. IPP Convergent has informed that the tentative dates for NTP are Caguas Energy Storage - January 2026 and Ponce Energy Storage - February 2026.
- Tranche 1 Barceloneta (IPP Pattern): IPP informed that they received financial approval from the LPO. Other projects from the IPP Pattern: PREPA approved Pattern's request for capacity increase (Santa Isabel: 50 MW additional for a total capacity of 100 MW. Barceloneta: 70 MW additional for a total capacity of 120 MW). IPP must sign LGIA to maintain the project on schedule.

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- Tranche 1 project Yabucoa Energy Park (IPP Go Green): PREPA must sign the PPOA and ESSA to maintain the project on schedule.
- Tranche 1 project Naguabo Energy Park (IPP Go Green): Need a new PSSE model from IPP to continue further studies after System Impact and Facility Site to determine the costs and final impact on the system for the network upgrades.
- Tranche 2 projects San Juan Solar (20 MW), Marisol Power (40 MW) and CS-UR Vega Baja (60 MW): IPP and PREPA must execute the PPOA/ESSA to maintain project on schedule.
- Tranche 4, (IPP Infinigen) IPP must provide Signing Conditions prior to contract execution by PREPA, Public-Private Partnerships Authority (P3A) and FOMB. IPP also has to send a new PSSE model for study reviews.
- San Germán Solaner 60% Design review scheduled for December 2025.
- Xzerta IFC is scheduled for January 2026.

Development of Comprehensive Transmission Plan

LUMA will submit a stand-alone Transmission Plan by the established filing deadline in compliance with the March 28th and July 16th Resolutions.

On Friday October 17, 2025, LUMA submitted a Transmission and Distribution Plan Report as Appendix I filed with the Integrated Resource Plan (IRP).

On Friday November 21, 2025, an additional Transmission and Distribution Plan Report was submitted to include transmission and substation investments required to facilitate the Integrated Resource Plan (IRP) Preferred Resource Portfolio (PRP).

Vegetation Clearing Program and Reclamation Efforts

LUMA has completed vegetation clearing across a total of 371.8 miles since program inception in June 2024, utilizing a maximum steady state of 56 crews. The regional breakdown of miles cleared is as follows (data is as of 12/15/25):

- Arecibo: 94.74 miles
- Caguas: 85.64 miles
- Mayagüez: 40.32 miles
- Ponce: 77.08 miles
- San Juan: 74 miles

Following the obligation of FEMA funds in April 2025, the program has successfully cleared 297.8 miles in the regions of Caguas, Ponce, Mayagüez, and Arecibo.

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An additional 26.76 miles were obligated across four 115 kV transmission lines, with clearing work beginning on November 25, 2025, and 0.64 miles cleared to date on Transmission Line 39000. LUMA continues to collaborate with FEMA to obligate additional miles on those four transmission lines in parallel with executing vegetation clearing on obligated segments.

LUMA continues to coordinate closely with Central Office for Recovery, Reconstruction and Resilience for Puerto Rico (COR3) and FEMA to secure new funding obligations. These efforts are critical to ensuring the continuity and expansion of the vegetation management program.

It is important to note that future progress remains contingent upon the approval of new project obligations and the availability of federal funding.

Priority Substation Rehabilitation/Rebuild Projects (Phase 2)

- Cataño 1801: Remains on-track. 38 kV Gas insulated Switchgear (GIS) arrived on island in October 2025 and put in position.
- Aguirre BKRS T018: Remains on-track.
- Costa Sur BKRS P001: Remains on-track.
- Monacillos TC Rebuild: Will no longer be an Engineering, Procurement and Construction (EPC) due to bids being cost prohibitive. This will now be a design-build project.
- Sabana Llana TC: Will no longer be an EPC due to bids being cost prohibitive. This will now be a design-build project.
- Centro Médico 1 and 2: Remains on-track.
- San Juan SPPTC: Will no longer be an EPC due to bids being cost prohibitive. This will now be a design-build project.
- Rio Grande Estates 2306: Remains on-track.
- Cambalache TC Relocation: Removed from FEMA Priority List, FEMA Accelerated Awards Strategy (FAASt) number deactivated.
- Tapia GIS Rebuild: Remains on-track.

Integration of Inverter Based Resources (IBR)

On June 20, 2025, LUMA submitted to the PREB in case NEPR-MI-2019-0009 proposed updates to Technical Bulletin 2024-001 concerning smart inverter settings. These revisions are the result of a collaborative effort with the Smart Inverter Working Group (SIWG), led by the PREB. The updated bulletin refines the original content, which was based on Institute of Electrical and Electronics Engineers (IEEE) 1547, and reflects input from stakeholders, system data, and best practices. LUMA remains committed to implementing the proposed updates promptly upon receiving PREB's guidance. On August 20, 2025,

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LUMA submitted to the PREB a Motion to Request Approval of Revised Smart Inverter Settings.² Note that distribution connected rooftop solar PV is increasingly causing high voltage during daytime solar production hours, and is negatively affecting all customers connected to those circuits. Implementation of proposed settings has become necessary to address critical safety, equipment performance requirements, and grid reliability concerns.

The plan aims to expand the applicability of the updated settings to distributed energy resources (DERs) covered under Regulations 8915 and 8916, which govern interconnection and net metering for distribution and transmission voltage levels, respectively. At the distribution level, the updates apply to DERs no larger than 1 MW, and at the transmission level, to those no larger than 5 MW.

Utility-scale IBRs continue to be governed by their Minimum Technical Requirements (MTRs), which LUMA periodically updates in response to evolving system needs and technological advancements. In addition, LUMA is currently evaluating potential updates aligned with the IEEE 2800 standard. During the month of September, LUMA met twice (09/04 and 09/17) with DOE's National Laboratories (i.e. NREL and PNNL) to discuss potential studies related to the update of MTRs in the context of IEEE 2800 and best practices in similar islanded grids. A follow-up meeting was held on October 17 to conclude the initial discussions. As a result, LUMA and National Laboratories agreed to continue collaborating on studies that support both immediate MTR updates and those requiring further analysis. A research proposal from DOE's National Laboratories is expected soon. LUMA remains awaiting the submission of the research proposal from the National Laboratories. No further developments have taken place during the month of November.

During the months of November and December, LUMA has continued its collaboration with DOE's National Laboratories, meeting with PNNL on a biweekly basis to further study interactions between distributed energy resources (DERs) and the transmission system, as well as broader power system dynamics. PNNL is currently developing several scenarios to analyze these interactions in detail, which will inform recommendations for future updates to IBR Technical Requirements.

Enhanced Frequency Regulation and Reserve Practices

LUMA will integrate the initial BESS as an ancillary service for frequency control and spinning reserve. These systems will be dispatched under our new energy management system (EMS), which includes the automatic generation control (AGC) feature.

The frequency control and reserve monitoring are features existing under the AGC. The adequate implementation of EMS dispatch controls with the external BESS will provide additional frequency stabilization capacities and recalculation of spinning reserves, with the possibility of a decrease on online reserves.

² The Puerto Rico Solar Energy Industries Association Corp., dba, solar and Energy Storage Association of Puerto Rico, opposed this request on August 25, 2025, and LUMA reiterated its request on September 18, 2025.

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The new EMS project completed Site Acceptance testing in November but still has variances that are under correction by vendor. Pending issues and training have extended cutover date and Go Live to January 31, 2026.

Assessment and Transition to Long-Term Improvement

An update will be provided at the 24-month mark per the timeline provided in the March 28th Resolution.

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3.0 Genera's Stabilization Activities

In compliance with the March 28th Resolution, this section includes the description provided by Genera outlining the key activities and progress achieved during November 2025 in relation to the PSP. This report includes an update regarding the most recent initiatives related to the short-term generation repairs, BESS project milestones, peakers units project developments and the critical components acquisitions and replacement program

Short-term Generation Repairs: Aguirre Unit 2

As previously set out, the air pre-heaters installation is scheduled for completion during March 2026. Current output 350MW.

Short-term Generation Repairs: San Juan Unit 6

The San Juan Unit 6 consists of two parts, a steam turbine and a gas turbine. During November the gas turbine continues in use with an output of 160MW. The installation of the steam turbine rotor is still scheduled for December 2025.

Short- term Generation Repairs Costa Sur 5

Unit under normal operation. Still in service at nominal load (410MW).

Short-term Generation Repairs: Palo Seco Unit 4

The unit is in service with a maximum load of 175 MW. The fuel mix characterization originally scheduled for November was rescheduled for December 2025. Once performed it will increase the load to 200 MW.

Deployment of 430 MW of Utility Scale BESS

Project Milestone - Important Dates:

Cambalache

- RG Engineering is working in site grading (cut and fill).
- Contractor finished the mesh installation for erosion control as part of the "Permito 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.

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- 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

- 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

- 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

- Genera expects contractor to be on site by January 2026.
- Notice to Proceed will be sent 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.

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- 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.

Deploy 244 MW of Flexible Generation

The project remains in its preconstruction stage, with continued efforts directed toward demolition planning, developing interconnection strategies, and engaging with primary stakeholders. Obtaining LUMA's approval of the unit retirement checklist is still crucial, as this step is key to keeping the project on schedule without affecting the critical path.

On November 2025, Genera provided, regarding the Unit Retirement Checklist, an updated spreadsheet showing the expected decommissioning dates and the Commercial Operation Dates (CODs) for both the BESS and Peaker units, allowing LUMA to review and provide comments.. Currently, Genera is undertaking an evaluation before submitting for LUMA's approval for the final unit retirement checklist. The project will continue to move forward once this step is finalized. Once approved, Genera will submit the decommissioning plan for all Peaker sites to PREB.

Genera is preparing documentation to issue a Request for Proposals (RFP) for the Engineering, Procurement, and Construction (EPC) contract covering the Peaker sites at Jobos, Yabucoa, and Dagua. Using an EPC approach offers schedule optimization opportunities and may help accelerate the COD targets for these sites.

At the program level, the FEMA Environmental and Historic Preservation (EHP) review is ongoing, with updated emissions data submitted. Genera remains aligned with the project timeline and continues to proactively address external risks and regulatory requirements.

Progress Overview by Site

Costa Sur

- For RFP #231161, awarded to Homeca Recycling, Genera is currently awaiting Homeca's signature to finalize the contract. Contract execution and demolition mobilization are both expected in December 2025.
- LUMA's impact study is expected to be received by December 2025, while the facility study date remains pending confirmation.
- Genera Legal continues working on the contract amendment with Siemens under Change Order #2, which includes a cost-reduction credit of \$226,241.00. The modification affects the balance of plant equipment to be supplied by Siemens, and both parties are aligned on its implementation approach.

Progress of the Electric System Priority Stabilization Plan

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- Genera published RFP #5069 for civil and structural works on October 30, 2025. The site visit with proponents was completed on November 12, 2025. Addendums have been issued, and the proposal submission date is currently expected in January 2026.

Jobos, Yabucoa, and Dagua

- Regarding the land transfer request, Genera continues awaiting LUMA's response or comments for Jobos and Dagua. LUMA has indicated responses are now expected in December 2025. Genera also remain pending LUMA's target date for the Yabucoa site.
- LUMA's impact study is expected by December 2025, while the facility study date remains unconfirmed.
- Genera continue preparing documentation to issue the RFP for the Engineering, Procurement, and Construction (EPC) contract covering these three sites. The RFP is now planned for December 2025, with contract approval expected from P3A and FOMB by June 2026.

Seek Environmental Waivers to Run the Three FT8 MOBILEPAC Units in Palo Seco on an Emergency Basis

There are no waiver requests pending approval.

Critical Component Replacement Program

The table below outlines components that have been ordered, RFP awarded, delivered or near delivery date.

Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024
Palo Seco	Palo Seco 3&4	Acid pumps P3 and P4	1	220919	Awarded	10/16/2024
Aguirre	Costa Sur 5&6/Aguirre 1&2	Air heater baskets (cold and hot)	1	221760	Awarded	1/10/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Air Heater Baskets (cold and hot)	1	4445/219639	Awarded	10/8/2024
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Air Heater Baskets (cold and hot)	1	4445/219639	Awarded	10/8/2024

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3&4	Air Heaters Baskets	1	4445/219639	Awarded	10/8/2024
Palo Seco	Palo Seco 3&4	Boiler and burners recirculation valves	2	220932	Awarded	4/30/2025
Palo Seco	Palo Seco 3&4	Breakers 480 & 4160	1	220928	Awarded	10/28/2024
San Juan	San Juan 7	Circulating pumps	2	4636	Awarded	6/16/2025
San Juan	San Juan 7	Cooling Tower	1	4608/222041	Awarded	3/21/2025
Mayaguez	Mayaguez	Demin RO system pump	2	220895	Awarded	10/25/2023
Mayaguez	Mayaguez	EDI system	2	220859	Awarded	8/2/2024
Palo Seco	Palo Seco 3&4	Feedwater heaters & Boiler lead valves actuators	4	221700	Awarded	1/8/2025
Palo Seco	Palo Seco 3&4	Feedwater heaters & Boiler lead valves actuators	6	221700	Awarded	1/8/2025
Palo Seco	Palo Seco 3&4	Fixed screens	7	4438	Awarded	1/14/2024
Cambalache	Cambalache 3	fuel control valve	1	Sole Source	Awarded	10/21/2024
Mayaguez	Mayaguez	Fuel skid pumps	1	220837	Awarded	12/6/2024
Mayaguez	Mayaguez	Fuel Transfer Pump	1	220891	Awarded	1/31/2025
Mayaguez	Mayaguez	Fuel skid solenoid valves	2	220864	Awarded	10/11/2024
Aguirre	Aguirre CC 2-3	Generator breaker 13kv	1	220839	Awarded	10/8/2024

Progress of the Electric System Priority Stabilization Plan

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 4	Recirculating valves	2	220932	Awarded	3/3/2025
Cambalache	Cambalache 2,3	Safety valve	2	221004	Awarded	11/12/2024
Palo Seco	Palo Seco 3&4	Spill over, cold reheat & superheater turbine seal steam valves	1	225589	Awarded	7/23/2025
Palo Seco	Palo Seco 3&4	Spill over, cold reheat & superheater turbine seal steam valves	1	225589	Awarded	7/23/2025
Cambalache	Cambalache 2,3	Steam bypass valve	2	220887	Awarded	10/8/2024
Cambalache	Cambalache 2,3	Steam release valve	2	220914	Awarded	10/17/2024
Aguirre	Aguirre CC 2-3	Torque converter	1	220877	Awarded	8/13/2025
San Juan	San Juan 9	Traveling screens	1	4764	Awarded	7/22/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	2	220904	Awarded	11/27/2024
Aguirre	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	2	220904	Awarded	11/27/2024
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	2	220904	Awarded	11/27/2024

Progress of the Electric System Priority Stabilization Plan
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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Condensing Circulating Water Pump Vertical motor 1000HP, 4000v/146rpm	1	220904	Awarded	11/27/2024
San Juan	San Juan 7	Continuous Condenser Wash SJ7	1	221530	Awarded	9/12/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp	3	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp	3	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp (Purchase of motor for BCWP and CCWP of unit 5)	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Circulating Water Pump Vertical Motor 700 HP, 4000v/90amp (Purchase of motor for BCWP and CCWP of unit 5)	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Awarded	11/13/2025

Progress of the Electric System Priority Stabilization Plan

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler Feed Pump Horizontal Motor 4500HP *5000HP	2	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 4750HP, 4000v/580amp *4500HP	2	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 4750HP, 4000v/580amp *4500HP	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 4750HP, 4000v/580amp *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	IDF Horizontal Motor 4750HP, 4000v/580amp *4500HP (Procurement of Induced Draft Fan (IDF) and Forced Draft Fan (FDF) Motors for Unit 5 and 6)	2	221150	Awarded	11/13/2025
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Awarded	11/13/2025

Progress of the Electric System Priority Stabilization Plan

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Awarded	11/13/2025
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Main Condensing Pump Vertical motor 500HP, 4000v/66amp	2	221150	Awarded	11/13/2025
Aguirre	Aguirre CC	Boiler feed pumps	2	220846	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	1	225916	Cancel	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	1	225916	Cancel	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	2	225916	Cancel	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Boiler feed water pumps *Feed Water Heaters	2	225916	Cancel	
Cambalache	Cambalache	Generator breaker 13kv	1	221012	Cancel	
Palo Seco	Palo Seco 3&4	Hydrogen cooler	1	219661(4456)	Cancel	
Palo Seco	Palo Seco 3&4	Hydrogen cooler	1	219661(4456)	Cancel	
Palo Seco	Palo Seco 3&4	Reduction station atemperatures	1	4523/220444	Cancel	
Palo Seco	Palo Seco 3&4	Reduction station atemperatures	1	4523/220444	Cancel	

Progress of the Electric System Priority Stabilization Plan

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Palo Seco	Palo Seco 3&4	Turning Gear Assembly	1	No competitive	Cancel	
Aguirre	Aguirre CC	Condensing Circulating Water Pump	2	221003	FOMB	
San Juan	San Juan 5	Continuous Condenser Wash SJ5	1	4214	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 6 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 6 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Costa Sur	Costa Sur 5&6	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Aguirre	Aguirre 1	Feedwater Heaters 7 *HP Vertical	1	221016	FOMB	
Palo Seco	Palo Seco 3&4	Set of open and close hardware - honeycomb seals, etc.	1	219624	FOMB	
Aguirre	Aguirre CC 2-3	Turbine section Stage 1, 2 & 3	1	Sole Source	Legal Division	
Mayaguez	Mayaguez	DCS	1	Sole Source	Legal Division	
Cambalache	Cambalache	DCS	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Fill shutoff valves	1	Sole Source	Legal Division	

Progress of the Electric System Priority Stabilization Plan

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Aguirre CC 2-3	GT compressor rotor	1	221001	Legal Division	
San Juan	San Juan 5 & 6	GT compressor wash	1	Sole Source	Legal Division	
San Juan	San Juan 5 & 6	GT compressor wash	1	Sole Source	Legal Division	
Cambalache	Cambalache	High speed control	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Leakage valve	1	Sole Source	Legal Division	
Cambalache	Cambalache 3	Nozzle valve	1	Sole Source	Legal Division	
Mayaguez	Mayaguez	PI-DAS System	1	Sole Source	Legal Division	
San Juan	San Juan 5,6,7	Traveling screens	1	4724	Legal Division	
Cambalache	Cambalache 3	Trip shutoff valve	1	Sole Source	Legal Division	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Aguirre	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Costa Sur	Costa Sur 5&6/Aguirre 1&2	Continuous Condenser Wash	1		No Spec	
Cambalache	Cambalache	Fire protection system	1		No Spec	

Progress of the Electric System Priority Stabilization Plan
Monthly Status Report – November 2025

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Cambalache	Cambalache	Leak detection system - fuel transfer line	1		No Spec	
Cambalache	Cambalache	Overhead crane	1		No Spec	
Palo Seco	Palo Seco Lab.	Demi 4 tank inlet regulation valve	0		Not required	
San Juan	San Juan 5 & 6	GT fully bladed rotor	0		Not required	
Aguirre	Aguirre CC	Cooling Tower motors	10	220871	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Deareator pump recirculation valves	1	221007	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Deareator pump recirculation valves	1	221007	Panel Evaluation	
Cambalache	Cambalache	Demin water resin	1	221117	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Exhaust duct	1	4433	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Fuel pump	1	220919	Panel Evaluation	
Palo Seco	Palo Seco 3&4	Fuel pump	1	220919	Panel Evaluation	
Cambalache	Cambalache 1, 2 y 3	Starting Frequency Converter Transformer	1	4454	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Switch gears 4kv	1	221853	Panel Evaluation	
Aguirre	Aguirre CC 2-3	Switch gears 4kv	1	221853	Panel Evaluation	
Mayaguez	Mayaguez	Clutch removal kit	5	292339	Pending Award	

Progress of the Electric System Priority Stabilization Plan

Monthly Status Report – November 2025

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Power Plant	Units	Description	Qty per Unit	RFP #	Procurement Status	Contract Signed Date
Aguirre	Aguirre 2	Feedwater Heaters 3 *LP Horizontal	2	221016	Pending Award	
Palo Seco	Palo Seco 3	Water heater 5 *HP Vertical	1	221016	Pending Award	
San Juan	San Juan 9	Recirculating fan duct and GRF	1		PMO	
Cambalache	Cambalache	Feedwater pump and motor	1	220919	Procurement	

Definitions

- **Awarded:** The contract or purchase order has been officially granted to the selected vendor, and the relevant documents have been signed.
- **Cancel:** The solicitation or purchase order has been terminated or withdrawn, but it is expected to be reissued later.
- **FOMB:** Under FOMB review.
- **Legal Division:** Under Legal Division review.
- **No Spec:** No Technical specifications available.
- **Not Required:** Not necessary according to GENERA-PR LLC Power Plant.
- **Evaluation Panel:** A committee of subject-matter experts (technical, financial, and/or legal) that reviews submitted bids and makes a recommendation for award.
- **Pending Award:** The evaluation phase is complete, but final approval or contract signature is still outstanding before the award can be declared.
- **PMO:** Under Project Management Office review.

4.0 PREPA's Stabilization Activities

Extend the Operation of the Seventeen (17) TM2500 Temporary Generation Units

Completed.

800 MW of Additional Emergency Temporary Base Generation for Interconnection between Aguirre and Costa Sur

- On November 17, 2025, the 3PPO sent PREPA the draft of the negotiated contract with Power Expectations for the PREPA's review.
- PREPA reviewed the documents submitted by the 3PPO for the contract with Power Expectations and determined that certain documents were missing, preventing PREPA from completing the review.
- PREPA sent a formal letter to the 3PPO requesting the missing documents necessary to complete the review of the Power Expectations contract submitted on November 17, 2025. PREPA also requested the status report of negotiations with the three recommended proponents.
- On November 21, 2025, the 3PPO submitted a report on the negotiations with the three proponents recommended under the RFP. The 3PPO reported that:
 1. Negotiations with Power Expectations had been completed and the final contract is the one submitted on November 17, 2025;
 2. Negotiations with Gothams Energy remain ongoing; and
 3. Javelin Global Commodities would be notified that negotiations cannot continue if it insists on modifying non-negotiable terms.

The 3PPO further indicated that it would submit negotiated contracts to PREPA as they are completed.

- On November 26, 2025, PREPA filed a motion with the Energy Bureau submitting the proposed contract with Power Expectations for the Energy Bureau's approval. PREPA also submitted the related contract documents to update the RFP record before the Energy Bureau, together with the negotiation report covering the three proponents and the correspondence related to negotiations with Gothams Energy and Javelin Global Commodities.

On December 11, 2025, the Energy Bureau issued a Resolution and Order approving the Power Expectations contract for 400 MW temporary generation at the Aguirre site, determining that its terms are prudent, reasonable, and align with the public interest, particularly given the critical condition and generation resource shortage of Puerto Rico's electric system.

Progress of the Electric System Priority Stabilization Plan

Monthly Status Report – November 2025

NEPR-MI-2024-0005

Seek Environmental Waivers to Run the Three FT8 MOBILEPAC Units in Palo Seco on an Emergency Basis

Pursuant to the PREB's July 16, 2025, Resolution and Order, Genera must provide a status update on this task as part of its monthly reporting obligations.

Exhibit 2

Monthly Report on the Status of the 4 x 25 MW BESS Project

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

December 29, 2025

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

NEPR-MI-2021-0002

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4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

1.0 Introduction

In accordance with the Resolution and Order dated January 14, 2025, issued by the Puerto Rico Energy Bureau (PREB) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at the LUMA 38 kV project. This report focuses on the key activities and progress achieved by LUMA in the past 30 days for the Battery Energy Storage Systems (BESS or collectively as the “Project”) approved by the Energy Bureau in its Resolution dated August 30, 2023 (“August 30th Resolution”).

2.0 Monthly Status Update

2.1 Detailed Scope of Work

LUMA has completed the review of the narrative for the proposed BESS initiative and presented it to all key stakeholders to advance the Section 406 Hazard Mitigation (406HM) proposal.

To ensure alignment among all key stakeholders and to support the advancement of the Section 406HM proposal, LUMA has established the following timeline for the next phases of review and submission:

1. Initial Review and Presentation to the Puerto Rico Electric Power Authority (PREPA)

Status: Completed – October 2025

LUMA finalized the BESS narrative and formally presented it to PREPA for initial review and feedback

2. Ongoing Final Review by PREPA and The Central Office for Recovery, Reconstruction and Resilience (COR3)

Status: In Progress

- On December 2, 2025, the Associate Director of PREPA’s Project Management Office (PMO) acknowledged receipt of the BESS proposal.
- PREPA conveyed feedback received from the Federal Emergency Management Agency (FEMA), indicating that the proposed BESS units do not currently meet the eligibility criteria for Section 406 Public Assistance Hazard Mitigation funding. The Agency found that:
 - The BESS “Hazard Mitigation Proposal” does not inherently demonstrate redundancy, as it involves a stand-alone system at a specific point of connection (POC) designed to respond to voltage and frequency fluctuations based on load demand along the 38 kV transmission lines.
 - The project appears to be primarily structured for operational grid optimization (responding to transmission line failures, voltage fluctuations, and system overload risks during peak conditions) rather than ensuring electrical system redundancy during natural disaster events.

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

- In response, LUMA's Director of Grants Management formally requested a multi-agency meeting on December 4, 2025, proposing a joint session with FEMA, the Public-Private Partnership Authority (P3A), PREPA, COR3, and HM representatives to present a comprehensive justification for the BESS initiative and to clarify FEMA's eligibility concerns.
- On December 4, 2025, FEMA's Acting Infrastructure Section Chief recommended that LUMA and PREPA conduct an internal coordination meeting prior to engaging FEMA. PREPA declined the joint meeting and requested that LUMA first conduct an internal strategic review to assess how the BESS initiative aligns with existing and planned generation projects.
- LUMA has scheduled an internal working session for January 2026 to revise the BESS narrative and strengthen the justification by detailing its correlation with generation projects and resilience objectives

3. Integration of Stakeholder Feedback and Final Internal Review

Status: Pending

Pending LUMA will incorporate feedback from PREPA and COR3 into the final version of the BESS Hazard Mitigation narrative. The updated document will undergo internal review to ensure alignment with regulatory requirements and stakeholder expectations.

4. Submission of FEMA 406 Hazard Mitigation Justification

Status: Pending

Following the completion of internal and stakeholder reviews, LUMA will submit the finalized BESS Hazard Mitigation Justification to FEMA for formal evaluation.

LUMA remains committed to maintaining close coordination with the PREB, COR3, PREPA, and FEMA to ensure that the BESS projects are prioritized and effectively incorporated into the Consolidated Project List.

2.2 Procurement

Since the BESS projects have been placed as "Process Discontinued", the procurement process is on hold until the projects are included in the Consolidated Project FAASt List and activated in the Grants Portal. LUMA's Grants Management team updated the 406 Hazard Mitigation narrative to ensure PREPA, COR3 and FEMA are aligned, allowing the BESS projects to be placed in the priority list and continue procurement efforts.

2.3 Design Status

The Preliminary Design has been completed. The selected vendor will manage the Detailed Design through a competitive procurement process.

2.4 Project Schedule

The project schedule was impacted due to the project being placed as "Process Discontinued" in the FEMA Grants Portal. When the projects get activated in the Grants Portal, LUMA will provide an updated schedule. The project schedule depends on LUMA being able to put projects on the priority list.

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

- Procurement - To be determined (TBD)
- Construction Start: TBD
- Commissioning: TBD

3.0 Project Status

3.1 Selected Sites

PREB previously approved \$4 million to support land acquisition activities for the BESS projects. However, due to the current “Process Discontinued” status of these projects in the FEMA Grants Portal, Due Diligence activities are temporarily on hold.

Specifically, the Phase 1 Environmental Site Assessment (ESA) — a critical step in the land acquisition process, — cannot proceed until the BESS projects are reinstated on FEMA’s Tier 1 list and reactivated in the Grants Portal.

Next steps and estimated timeline (Pending FEMA reactivation).

Table 1. Land Acquisition Milestones and Estimated Timeline

Milestone	Estimated Duration	Projected Completion
FEMA Tier 1 Inclusion & Grants Portal Activation	-	TBD (Pending FEMA)
Phase 1 ESA Initiation	2 Months	+2 Months from Activation
Land Appraisal & Due Diligence	1-2 Months	+3-4 Months
Negotiation & Legal Review	6-7 Months	+10-11 Months
Closing & Title Transfer	1 Month	+12 Months

3.2 Reimbursement Status

The reimbursement process is on hold; no reimbursement is available since the project has been placed in the FEMA Grants Portal as “Process Discontinued”. Below are the reimbursements received prior to that.

Table 2. Reimbursement Received

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manati] (Substation)	\$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$47,355.27

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

NEPR-MI-2021-0002

3.3 Requests for Information

LUMA presented the document to PREPA and COR3 for review by November 2025, before submitting it to FEMA. The response to FEMA's soft request for information (RFI) is expected to be submitted in early 2026 after the alignment mentioned in Section 2.1 of this document is completed.

3.4 FAASt Number

As indicated in Section 3.1 above, LUMA has identified four areas where it intends to site the projects. The FEMA FAASt numbers for the four BESS projects are:

Table 3. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	738671 (Inactive)
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	752972 (Inactive)
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	750502 (Inactive)
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	750503 (Inactive)

3.5 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta, Manatí, Aguadilla and San Juan Detailed Scopes of Work (DSOWs) submitted to FEMA.

Table 4. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate (\$)
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	\$55,941,767
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$57,640,005
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$52,720,520
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$55,503,065