

**GOBIERNO DE PUERTO RICO**  
**JUNTA REGULADORA DE SERVICIOS PÚBLICOS DE PUERTO RICO**  
**NEGOCIADO DE ENERGÍA DE PUERTO RICO**

NEPR

Received:

Jan 28, 2026

10:14 AM

**IN RE:** ENMIENDAS A CONTRATO DE COMPRAVENTA DE ENERGÍA: PROYECTO NO-OPERACIONAL (XZERTA-TEC SOLAR, LLC).

**NÚM. DE CASO:** NEPR-AP-2021-0002

**MOCIÓN PARA PRESENTAR INFORME DE PROGRESO MENSUAL**  
**CORRESPONDIENTE AL MES DE DICIEMBRE DE 2025**

**AL NEGOCIADO DE ENERGÍA DE PUERTO RICO:**

**COMPARECE** la Autoridad de Energía Eléctrica de Puerto Rico ("AEE") a través de su representación legal que suscribe, y muy respetuosamente expone y solicita:

1. Mediante la Resolución Final y Orden emitida por el Negociado de Energía de Puerto Rico (en adelante, "NEPR") en el caso de epígrafe, se ordenó, entre otras cosas, que la AEE y Xzerta Tec Solar I, LLC (en adelante, "Xzerta") presentaran informes mensuales de progreso sobre el estatus del proyecto.

2. En cumplimiento de las órdenes de este Honorable Negociado, la AEE somete el Informe de Progreso titulado *Xzerta-Tec Solar I, LLC December Progress Report*, correspondiente al mes de diciembre de 2025, según consta. Véase Anejo A.<sup>1</sup>

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<sup>1</sup> Se le ha notificado dicho reporte a LUMA. De tener comentarios se estará expresando en escrito por separado.

**POR TODO LO CUAL**, la AEE solicita respetuosamente al Negociado de Energía que tome conocimiento de lo aquí informado y acepte el Informe de Progreso de diciembre de 2025.

**RESPETUOSAMENTE PRESENTADO.**

En San Juan, Puerto Rico, a 28 de enero de 2026.

**CERTIFICO:** Por la presente certificamos que este documento fue presentado ante la Oficina del Secretario de la Oficina de Energía utilizando su Sistema de Presentación Electrónica en <https://radicacion.energia.pr.gov/login>, y se ha enviado copia de cortesía mediante correo electrónico a [Laura.rozas@us.dlapiper.com](mailto:Laura.rozas@us.dlapiper.com) y [mariaemartinez@gmail.com](mailto:mariaemartinez@gmail.com).

**GONZÁLEZ & MARTÍNEZ**

1509 López Landrón  
Séptimo Piso  
San Juan, PR 00911-1933  
Tel.: (787) 274-7404

**f/ Natalia Zayas Godoy**

Natalia Zayas Godoy  
RUA Núm.: 20,415  
E-mail: [nzayas@gmlex.net](mailto:nzayas@gmlex.net)

## Anejo A



January 07, 2026

Mrs. Mary Zapata  
 Executive Director  
 Puerto Rico Electric Power Authority

**RE: Xzerta-Tec Solar I, LLC December Progress Report**

Dear Executive Director:

Herewith, we are providing our monthly progress and status report including project activities required for the project completion. In the upcoming months, our team will continue sustaining meetings with both PREPA and LUMA to refine the engineering design and the facility’s interconnection to the grid. The following table will be used to identify the project activities, and any other issues with their respective status and progression for the proper implementation of this project.

#	Activity	Description	Status	Comments
1	<b>Design</b>			
	A. Power Design - Drawings	The transmission line detailed design, which includes the path, transitions and the Sag and tension study, have been completed and shared with LUMA but Xzerta has not received any comments by LUMA. On June 27 <sup>th</sup> , Xzerta submitted the plan set to Luma the final design for approval. On July 28 <sup>th</sup> , 2025, LUMA responded Xzerta request with comments on the plan set. The majority of their comments were related to their enforcement of their latest standards of 2024 & 2025, which are not applicable to this PPOA. Xzerta responded to LUMA comments of the design on July 30 <sup>th</sup> , 2025 including rejecting all those comments not applicable to our PPOA. Xzerta and LUMA had a follow up meeting on August 8 <sup>th</sup> , 2025 but no progress was made with the disagreed items. LUMA is internally	Final Design submitted to LUMA for approval. LUMA responded with comments in reference of their latest standards.  Pending Detailed Design.	Xzerta has completed the final design based on technical discussions with LUMA including their request to separate the lines for 115k and 38k. Their latest comments on the design are more related to their latest standards which are not applicable to our PPOA. Xzerta has responded to their comments back in July 30 <sup>th</sup> and resend the comments in August 8 <sup>th</sup> , 2025 and has submitted a new package on Oct 31 to close those items. RFIs have been

**Disclosure:** This report is provided for informational purposes only. By accepting this information, the recipient agrees that it will, and it will cause its employees, agents, and representatives, to treat the information as such. Any reference made herein to terms or conditions should be subject to the language of the power purchase and operation agreement. The Information supersedes all information contained in any prior report or presentation for this project and is subject to change.



		<p>discussing our responses before providing any feedback to Xzerta as previously told by LUMA in the September 8<sup>th</sup> meeting. During this meeting it was agreed to evaluate all products and Xzerta proceeded to resubmit all previous RFIs with the products data.</p> <p>After Xzerta followed up with LUMA via email because no responses were provided, LUMA requested a meeting to be held on October 3<sup>rd</sup> to discuss the FNTP requirements, Final Design and products approval but no other information was shared with Xzerta. As per PPOA, the design review requires supported information to reject a design and PREPA, in this case LUMA, was responsible for providing specific information of required modification of the design. Furthermore, turnaround reviews shall not take more than 30 days. LUMA has not responded to Xzerta responses provided on July 30<sup>th</sup> to their comments in the past 60 days. Meanwhile, Xzerta has updated the drawings based on the comments that were accepted and released by October 31.</p> <p>After several conversations, PREPA proceeded to release FNTP on October 15<sup>th</sup>, keeping the guarantees as requested by PREB. Xzerta has proceeded with the detailed design and has also submitted additional RFIs to LUMA for product approval, additional information and field conditions validation.</p> <p>The approval of long lead products is imperative to proceed with the detailed design and to proceed with the procurement to be able to complete the construction 24 months from FNTP. On November, LUMA requested Xzerta to initiate a series of progress meeting and made the commitment to reevaluate the products to complete the process of</p>	<p>submitted for products approval, information and field conditions validation. LUMA have approved some but others not.</p> <p>Xzerta has expressed concerns regarding the separation of the 38K and 115K since will be required to enter in a private property which has a history of litigation with PREPA. This issue will potentially impact the construction and provoke delays by others impeding the entrance to the premises.</p> <p>Based on the force majeure events triggered by others and previously by LUMA, the project schedule has continued to slip or push down drastically impacting COD with no recovery and will have further detrimental consequences in the financial side. PREPA has released the FNTP, to allow Xzerta to proceed with procurement and financial support but still products approval and final design are pending on Luma's approval. LUMA commence approving and disapproving products and shared a design template, which is under</p>
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		<p>approval of the products. LUMA responded several open RFIs approving and disapproving the proposed products. Furthermore, LUMA decided to share a design template to ensure that the design of the new interconnection additions is standardized in all projects. Xzerta is evaluating the shared template while waiting as well for the validation of the field conditions to ensure proper design integration is performed.</p> <p>Eaton has commenced with the SCADA, Communications, Comm House, Switchgear and protective systems design. Eaton is evaluating the set of design template shared by LUMA. They visited Hatillo TC in December to obtain more information.</p> <p>LUMA responded to several RFIs in December providing clarification for some items and approval of some products based on the results of the interconnection study. There is still one item in question to be discussed in January 2026 related to the DFR. LUMA released their latest comments on Xzerta final design on December 30<sup>th</sup>, 2025. Xzerta is evaluating their comments and it will incorporate any applicable comments in the detailed design.</p> <p>Xzerta received approval from the CBDG ER2 program the following: NEPA study, procurement of long lead items, the replacement of products such as racks and BESS if needed.</p>		<p>evaluation. Furthermore Xzerta has obtained approval from the CBDG ER2 program regarding NEPA, Procurement of Long Lead Items and Replacement of products such as Racks and BESS.</p>
	<p>B. Energy Yield Assessment and Relay Study</p>	<p>Relay Study was submitted on Sept 21, 2022. This item will remain open until the synchronization happens.</p> <p>The energy yield assessment was submitted for approval on Sept 30<sup>th</sup>, 2022 and accepted by LUMA on June 2<sup>nd</sup>, 2023 stating that all values</p>	<p>Closed for Energy Yield Assessment. No comments were received of the relay study</p>	<p>The Energy Yield Assessment Report was accepted on June 2<sup>nd</sup>, 2023. Relay study is still pending for approval. A updated study will be released during study</p>

		<p>were accepted, and no further comments were necessary.</p>		<p>the synchronization process.</p>
	<p>C. Products</p>	<p>Proposed products and Models for the interconnection have been submitted to LUMA for approval.</p> <p>Documentation for the inverters, batteries, Transformer, Protective relays, GCBs, BESS and MV switchgear were transmitted for approval, but LUMA stated that they will not approve any Products related to the solar farm or facility but only the interconnection.</p> <p>Xzerta has stated many times to LUMA that approval of products was necessary to avoid delays in our orders. That was the reason that Xzerta submitted all products for approval to limit the risks associated with ordering products that have not been properly vetted. To avoid any risks, Xzerta is forced to wait for the final acceptance of the design as stipulated in the PPOA. This reason was emphasized during the meeting held on September 8 and October.</p> <p>LUMA has recently approved GCB and transformers with no further exceptions pending on implementation, but other products have been rejected. LUMA has released in Nov 2025 a template design as a guideline for the design to support expediting the process. The template is under evaluation. The proposed DFR was rejected but their alternative has lower capacity than the one proposed and does not meet the DSM requirement for recording transient. This item still under discussion with LUMA.</p> <p>Hitachi has recently notified Xzerta that the lead times of some products could reach 36 months.</p> <p>Xzerta has received on December 29<sup>th</sup> the approval from the CBDG PM to procure the long lead items list.</p>	<p>in compliance with the MTRs but waiting for Design approval as stated by LUMA in previous responses to our Monthly report</p>	<p>LUMA previously stated that the products will not be approved until the final design has been submitted and approved. Notwithstanding, Xzerta has completed the final design, which is pending for approval to proceed with detailed design of the Communications and Protective Systems even though the approval of products is imperative to complete the detailed design and to order those long lead items. The schedule has continued to slip due to major delays generated by LUMA affecting the COD because of the inability to proceed with the detailed design without the approval of the final design and with the procurement of the products with long lead times identified as critical path because LUMA has not approved all products nor the final design. LUMA has recently approved some but others not. Ordering any products without proper approval is high risk and major liability.</p>

	D. SCADA list	Our team is in receipt of the current SCADA list sample shared by LUMA. Based on this sample, our team will develop the preliminary SCADA Point list and will add all available alarms and events based on the final design. Eaton has commenced the SCADA design, protective relays based on submitted relay study, comms design and the latest approved interlocking by LUMA.	In progress	Under development by Eaton but waiting for final field validation by LUMA.
	E. Other Design	A final design has for the transmission lines and protective relays has been submitted on 06/27/2025 based on the following changes: Relocation of Cambalache 115KV Line, the addition of a new GCB, and Separation of 38KV and 115KV. The Sag and tension study was included in the plan set. LUMA provided comments on July 28 <sup>th</sup> , 2025 and Xzerta responded on July 30 <sup>th</sup> . A follow-up meeting was held in August 8 <sup>th</sup> but no additional progress has been made. It was agreed by the parties to re-evaluate the products. Xzerta proceeded to resubmit all related RFIs with the data and a list of long lead items. Xzerta is waiting for LUMA to evaluate the responses as per the email on September 22 <sup>nd</sup> shared by LUMA's PM. LUMA requested to hold another meeting in October 3 <sup>rd</sup> . By October 31, Xzerta released an updated version of the final design to close the comments from LUMA. At the same time, LUMA released their design template. They did request to remove a protective that was part of the accepted protective scheme back in 2024 but Xzerta responded that major changes in design will require a Design Change Request form to be executed. LUMA has not responded to any of Xzerta comments to this issue. They have commenced closing some of the RFIs. Xzerta is still waiting for field conditions validation. LUMA responded to several open RFIs by the end of December 2025. Xzerta is evaluating their responses, their	Open	<p>All changes are pending on the approval by LUMA of the latest final design.</p> <p>All Dispute Items have been resolved or agreed upon. See the table below.</p> <p>Refer to the items above for further updates.</p>

		<p>comments to the design and the templates they shared. LUMA confirmed that the as built drawings must be validated at the field.</p> <p>Xzerta expressed to LUMA and PREPA that the Separation of the lines had potential issues of encroachment with a nearby property. The potential issues with owner of the property may arise during the construction phase due to the impediment of accessing private property to perform the work in the ROW.</p>		
	F. Dynamic Study	S&L confirmed that the PSSE and PSCAD or Dynamic Studies reports are in compliance with the MTR's	Closed	
	G. Winds Conditions requirement	LUMA/PREPA winds conditions requirement of 160 MPH has become an issue. Several vendors have responded that they will be unable to meet this requirement. Currently, products meet 140 MPH. ASCE allows the 140 MPH criteria on the location that the farm will be built. It was requested an exemption and LUMA responded that the requirement is only applicable to equipment that will be handled or owned by PREPA or them. Furthermore, LUMA will not provide any technical inputs to any equipment or products that are not within the interconnection.	Closed	LUMA stated that this particular requirement is not applicable, and they will not provide any technical input of products used outside of the interconnection. GCB which meets 140 Mph has been approved. 140 MPH meets ASCE requirements
	H. Transmission line design and Easement Usage / Permit	<p>The permit was finally executed as of 11/20/2024 but potential issues emerged due to the request to separate the 38kv from the 115KV line path.</p> <p>Xzerta has submitted the final design with Sag and tension study to LUMA for approval since no previous comments from LUMA have been received.</p> <p>LUMA released their comments on the final design on December 30<sup>th</sup>, 2025 and it is under evaluation.</p>	Closed	<p>The permit is considered closed but the design is still open. It will be followed under item 1.</p> <p>See item 1, c and Dispute Items Table.</p>
<b>2</b>	<b>Commercial</b>			
	A. Certifications	filed with the Puerto Rico Energy Bureau for Xzerta Tec's Electric Service Company Certification as required under Rule 8701	Completed	Approved

	B. Loans	<p>Term Sheet was received.</p> <p>A financial Structure was sent to PREPA for their evaluation.</p>	In Progress	<p>As of June 1, 2023, the Financial Due Diligence was completed. Final underwriting pending on FNTF released and construction permits approval.</p> <p>Xzerta applied to the CBDG ER2 and DOE Grant programs. CBDG application has been approved, and the grant contract has been signed. Release of funds pending NEPA approval. Xzerta decided to pause other applications. Investors have been secured and credit lines with vendors have been opened.</p>
	C. Leases	<p>Executed the extensions on the leases of the properties that required such extensions. Xzerta continues to maintain land control over all the proposed parcels, plus some additional lots have been added and surveyed to guarantee the necessary space for the increased capacity.</p>	Completed	
	D. Mars CPA Report	<p>Commissioned a report from our accounting firm Mars CPA regarding the possible incentives available to the project under the Puerto Rico Incentives Code, to review the prior decree granted to the project by the Department of Economic Development and to establish the final structure regarding the tax equity of the project.</p>	Completed	
	E. LUMA Interconnection Agreement	<p>LGIA has been signed, notarized and executed.</p>	Closed	Closed
<b>3</b>	<b>Contracting</b>			
	A. Land Survey and Topographic Survey	<p>Geomatic Solutions and Surveying, PSC</p>	Completed	
	B. Plant Design	<p><b>Roman Duran Engineers, LLC</b></p>	Completed	
	C. Archaeological Study	<p>Fernando Alvarado</p>	Completed	

	D. Environmental Site Assessment Phase I-A Phase I-B	Tycroes group	Completed Delivered	Phase B received and under review
	E. Habitat Study	Alejandro Cubiña	Completed	
	F. Foundation Design	Carlos Rivera, P.E.	Completed	
	G. Anchoring	Solar Mounts	Completed	
	H. Electrical Design	-Miguel Ortiz, P.E. executed -Lisaidyn Perez Contract renewed -Enerzinx <b>-Roman Duran Engineers, LLC contract has been executed.</b> <b>-DEA contract executed</b> <b>-Eaton Contract – Executed.</b> <b>-Ingeteam - Contract under negotiations</b>	<b>Open</b>	
	I. SCADA Systems Design	Lisaidyn Perez and Eaton	Completed	Eaton's contract has been executed as of 09/29/2025
	J. Modeling and Simulations	Enerzinx	Completed	S&L and LUMA stated that it is in compliance with all MTR's
	K. Relay Study	Enerzinx	Completed	On Feb 21, 2023, S&L and LUMA's completed the Interconnection and Facility Studies determine that Preliminary design is in compliance with all MTRs.
	L. Transmission Lines	RD Eng LLC - transmission line design DEA - the Sag and Tension Analysis EATON – SCADA, Comms and Protection Scheme	Completed	Final Design Submitted on 06/27/2025 for approval. LUMA provided their comment on July 28 <sup>th</sup> , 2025. LUMA shared their design templates which are under evaluation.
<b>3</b>	<b>Construction</b>			
	A. Permits	Completed the following: 1. Location 2. Environmental 3. Endorsements by  - Highway and Transportation Authority - Puerto Rico Energy Bureau	Partially Completed. See status on individual items	LUMA / PREPA approved the usage of ROW/ Easement, was finally signed and executed.

		<ul style="list-style-type: none"> <li>- Cultural Institute</li> <li>- Puerto Rico Telecommunications Bureau</li> <li>- Puerto Rico Aqueduct and Sewer Authority</li> <li>- Department of Agriculture</li> </ul> <p>4. Permits Management Office (OGPe) – Construction Permit approved and Xzerta was validated as an electrical contractor</p> <p>5. NWP-14 – Not required since there are not jurisdiction wetlands and water on the properties</p> <p>6. Pending</p> <ol style="list-style-type: none"> <li>1. NPDES General Permit – Not required until construction starts</li> <li>2. NEPA – Approved</li> <li>3. Farmland Report - Approved</li> </ol>		
	B. Land Acquisition		Completed	
	C. Contractors	<p>No major changes, waiting for final drawings with Luma comments to be completed.</p> <p>Preliminary Scope of work was distributed to potential EPC, waiting for their updates of the quotes</p>	In progress	General Contractor (GC), subcontractors and consultants' agreements are in process.
<b>4</b>	<b>Procurement</b>			
	A. Material List	The material list has been generated but many long lead products are waiting for proper approval. S&L and LUMA's interconnection and facility studies have determined that Xzerta proposed design is in compliance with the MTR's. Xzerta is waiting for final acceptance of the Design because. Recently, LUMA have recently approved the GCBs, the Transformer and other products based in the results of the interconnection study. LUMA released their templates as a guideline. CBDG approved the procurement of long lead items at the end of December 2025.	Waiting for approvals	Refer to Material List Annex 1 found below for further information, item 1 above and Dispute table below.
	B. Orders	Waiting for LUMA's or PREPA's approval of proposed products and approval of final design as required by PPOA. CBDG PM approved	In progress	Long lead times of equipment will impact final implementation of

		Xzerta to start the procurement of Long Lead items.		project and COD. Design approval is causing major schedule slips and financial impacts. A notice of delay has been transmitted but with the additional delays on LUMA's side, it is foreseen having further delays impacting the COD.
<b>5</b>	<b>Implementation</b>			
	A. Installation	<p>Preliminary definition of scope of works has been created and shared with proponents.</p> <p>Contractors (BLDM, LORD, Aireko, Solar Mounts and Dynamic Solar among others) visited in December once again the premises in order to update their quotes, but final prices and contract are pending on the final approvals.</p> <p>LUMA has agreed to perform only the construction of the modification at Hatillo TC leaving Xzerta with the contractual obligation to provide the materials. LUMA also agreed to involve Xzerta in the process of the procurement and management of the EPC.</p>	In progress	Waiting for acceptance of proposed design changes and final design
	B. Testing	Master Plan to be generated after approval of the design and upon receiving PREPA's approved testing protocols. Master plan and test procedures will be generated in accordance with PREPA/LUMA approved testing protocols and operations.	Not started	LUMA submitted their test protocols. The master plan will be based on this information and the final approval of design

### Dispute Items Table

The following table identified the open items that are in dispute since 2022 and requires a prompt resolution as stated in Xzerta 2<sup>nd</sup> Dispute Notice and Notice of Delay

1	Dispute item	Description	Status	Comments
	A. Cost for interconnection study	Xzerta position was that it will not bear the cost for all proposed changes nor pay in full for the requested interconnection study by LUMA since it was others that did not	Closed	

		comply with PREPA's design standards and further, it is not a contractual obligation.		
	B. PREPA's Interconnection Facility Construction and provision of materials	The PPOA places the responsibility of the interconnection construction and provision of materials on Xzerta. PREPA may elect to perform the construction, but Xzerta will always provide the materials. LUMA is pushing to perform the construction and purchasing of materials neglecting the PPOA terms.	Closed	This item partially affects the design completion, and the procurement commencement as stated in the meeting of May 2 <sup>nd</sup> . As of May 14, 2024, LUMA has agreed via email with the terms of the PPOA where LUMA will perform the construction and have Xzerta providing the materials.
	C. LUMA's Interconnection agreement	LUMA is requiring Xzerta to enter into a new interconnection agreement. Xzerta position is this interconnection agreement is not in compliance with the PPOA and further, the PPOA has all required terms and conditions for the interconnection	Closed	Several items were discussed at the meeting of January 10, 2025. Then after, LUMA and Xzerta agreed on January 30 <sup>th</sup> , 2025, with the latest LGIA T&Cs. Executed
	D. Use of Right of Way	The usage of ROW was agreed by all parties since the route was already established within the PPOA. LUMA Land Office continues to maintain language in the CONDITIONED PERMIT FOR USE OF ELECTRICAL LINE EASEMENT that hinders the capacity of Xzerta to enter into the aforementioned conditioned permit, particularly due to the time limits to be imposed and other items related to LUMA's interconnection agreement.	Closed	Final version signed and executed on November 20, 2024.
	E. Increase Interconnection Costs.	LUMA's estimate of the interconnection surpasses the original estimated value of 3.2M established within the PPOA. Xzerta is requesting PREPA to increase the cap value of Article 4.6 and PPOA inflation factor for the power purchasing by 2% as approved by PREB Motion of May 2021.	Closed	PREPA agreed with this request and therefore, the item is not considered a dispute. Item will be addressed separately via an amendment of article 4.6 of the PPOA. Due to several other issues that required prioritization, this item has not been sent for a request to

			amend the cap and is pending on the final amount cost once the RFP process is completed.
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The following table shows the status of RFIs:

#	Number	Description	Status	Date Submitted	Comments
1	RFI-001	Transformer specs and interconnection requirements (Y-D, D-Y or D-D)	Closed	4/26/2022	1 item remained open but followed by RFI-002. Transformer should be YG to Delta on the side of interconnection of 115 KV with PREPA with an internal shift of 30
2	RFI-002	Transformer specs (Not responded under RFI-001)	Closed	5/23/2022	Specifications received. Issues with Wind Conditions requirement. It will be followed through RFI-006
3	RFI-003	SCADA Communication Protocol and Sample of Points	Closed	5/23/2022	Received List.
4	RFI-004	Amount of demand Energy of PR	Closed	5/23/2022	Calculated at 0.0003% or 0.001 %
5	RFI-005	Request of Permit to usage of PREPAs ROW	Closed	5/23/2022	RFI was closed but Item is still open. LUMA requested to submit a request for usage of easement via another form since it is managed by their Dept of Land and Permits. Item is under Dispute.
6	RFI-006	Request for exemption to Wind Conditions requirements. Vendors unable to meet criteria of 160 MPH. Current design meets 120 to 140 MPH	Closed	6/2/2022	LUMA stated that the cited specification details the requirements for equipment to be owned, operated, and maintained by PREPA/LUMA. Knowing that this equipment will remain under the care, custody, and control of the proponent, LUMA will not provide technical input on alternate wind load criteria for transformer components, since it is not an evaluation factor to determine the Facility's capability to be interconnected to the grid. Current design meets ASCE req. Refer to PPOA sections 9.4(a) & (b).
7	RFI-007	Request for approval of GCB proposed product	Closed	6/2/2022	Hitachi GCB Breaker for 115 KV. It has been conditionally approved. LUMA requested to increase CC of GCB1 based on their current design, 145 KV @ 2000 A CC.

					LUMA stated that it will not be approved until final design is completed.
8	RFI-008	Request for approval of MV Switchgear proposed product	Closed	6/30/2022	LUMA stated that the MV switchgear approval is not within responsibilities. This will remain under contractor decisions regarding the solar farm or facility design. Synchronization of the protective relays of the main breaker 52-1 are required to properly intertwined with GCB 2 and GCB 52.
9	RFI-009	Request for approval of Protective Relays, Network Switch, Controller	Closed	2/21/2023	LUMA approved the products based on the results of the Interconnection and Facility Studies. Preliminary design is in compliance with MTRs. LUMA shared templates as guidelines.
10	RFI-010	Request for approval of Dynamic Studies	Closed	2/21/2023	S&L and LUMA's completed the Interconnection and Facility Studies. Preliminary design is in compliance with MTRs. Xzerta considers this item approved.
11	RFI-011	Request for approval of 3P Main Step-Up Oil Transformer 34/115KV	Closed	7/11/2022	LUMA approved the transformer based on the results of the Interconnection and Facility Studies, with no exceptions taken
12	RFI-012	Request for Testing Protocols and operating procedures	Closed	8/1/2022	Delivered
13	RFI-013	Request for LUMA/ PREPA to confirm if the Seismic Design Category can remain in A instead D because there is no historical data that requires to consider inertial loads associated with earthquakes within the area	Closed	10/13/2022	LUMA will not evaluate the civil design aspects for the medium voltage switchgear, since this equipment is located upstream from the Main Power Transformer, and thus lies beyond LUMA's evaluation responsibilities for privately-owned Renewables projects. It will comply with ASCE stds.
14	RFI-014	Request PLS-CADD files for Transmission line detailed design	Closed	12/6/2022	LUMA provided the requested information and files
15	RFI-015	Response for Letter of Request of Permit to usage of PREPAs ROW	Closed	1/24/2023	Xzerta submitted to LUMA's Lands & Permits team on Nov 23, 2022, a 2nd request for the usage of existing easement/right-of-way that was reserved for future work on previously existing 115kV transmission line 39100 spanning westbound from Hatillo TC to

					Mora TC, in Isabela. It has been approved with the condition of been prepared for dual lines. A conditional permit was executed.
16	RFI-016	Request for Design Information for secondary circuit of 115KV transmission line	Closed	3/22/2023	LUMA provided the requested information and files
17	RFI-017	Request for Long lead Products Approval	Closed	9/9/2025	LUMA provided a set of template to follow and it is under evaluation by our design team.
18	RFI-018	Request for GCBs 2000A approval	Closed	10/6/2025	Approved with no exception taken
19	RFI-019	Request for DFR and PAC approval	Open	10/10/2025	LUMA didn't approved proposed equipment but provided two alternative ones, the 1 <sup>st</sup> is not available for direct purchasing and the tesla one has lower capacity of the proposed one. In a recent email, LUMA agreed to reevaluate proposed equipment.
20	RFI-020	Request for RTAC approval	Open	10/10/2025	TBD
21	RFI-021	Request for Network Switches approval	Closed	10/10/2025	
22	RFI-022	MLPS Switch usage for main network switches	Closed	10/15/2025	
23	RFI-023	Telecom Equipment Information	Closed	10/15/2025	
24	RFI-024	487 B and field conditions request for information	Closed	10/15/2025	LUMA provided the as built single line but suggested having a 3d scanning to validate field conditions. TBD
25	RFI-025	CT and PT approval	Open	10/31/2025	

The following table shows the status of Transmittals:

#	Number	Description	Status	Date Submitted	Comments
1	XTA-TRA-0001	Relay Study and Updated Preliminary design	Closed	9/21/2022	Interconnection and facility study completed by S&L and LUMA on Feb 21, 2023. It is determined that Xzerta proposed design is in compliance with all MTR's. Xzerta assumes that all preliminary design is approved and can proceed with the detailed design. No

					input has been provided on the Relay Study.
2	XTA-TRA-0002	Energy Yield Assessment	Closed	05/31/2023	LUMA releases on June 2 <sup>nd</sup> , 2023, an acceptance of this document. A second assessment is required to be performed once the system is implemented and ready for operations.
3	XTA-TRA-0003	Relay Study and Updated Preliminary design based on LUMA's Comments of 10/3/2022	Open	10/28/2022	Interconnection and facility study completed by S&L and LUMA on Feb 21, 2023. It determined that Xzerta proposed design is in compliance with all MTR's. As of today, Xzerta have not received any additional comments of the Relay Study thus this item is considered open.
4	XTA-TRA-0004	Xzerta Ltr 2nd Request of Permit Use of ROW and Rev 14 SLD Preliminary Design	Closed	11/23/2022	LUMA's team responded to Xzerta comments on August 8, 2024 regarding their concerns of the language utilizes especially those related to technical approach. A meeting was held to discuss those concerns and provide any additional clarification to LUMA Land Dept. It was agreed having Xzerta would provide again an alternative language for the permit. The item is still open and is affecting the design. .
5	XTA-TRA-0005	RFI 016 Request of Design Information for secondary circuit of 115KV transmission line	Closed	3/22/2023	
6	XTA-TRA-0006	Energy Yield Assessment and comments of Conditioned Permit for use of the electrical lines' easement	Closed	6/02/2023	

We continue committed to providing PREPA and the people of Puerto Rico with clean and efficient energy and to assist in achieving the targets established in the Integrated Resources Plan (IRP) and the Public Policy aimed at by the Government of Puerto Rico.



XZERTA-TEC  
SOLAR

Sincerely,

  
Fernando Molini-Vizcarrondo

xc: [Jorge.cotto@prepa.com](mailto:Jorge.cotto@prepa.com)  
[lionel.santa@prepa.com](mailto:lionel.santa@prepa.com)  
[Fernando.Osorio@prepa.pr.gov](mailto:Fernando.Osorio@prepa.pr.gov)  
[arivera@gmlex.net](mailto:arivera@gmlex.net)  
[alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov)  
[Hector.gonzalez@prepa.pr.gov](mailto:Hector.gonzalez@prepa.pr.gov)  
[nzayas@gmlex.net](mailto:nzayas@gmlex.net)  
[felix.hernandez@prepa.pr.gov](mailto:felix.hernandez@prepa.pr.gov)  
[maria.reyes@prepa.pr.gov](mailto:maria.reyes@prepa.pr.gov)  
[rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net)  
[jgonzalez@gmlex.net](mailto:jgonzalez@gmlex.net)  
[Adrian.Torres@Lumapr.com](mailto:Adrian.Torres@Lumapr.com)  
[David.Monasterio@Lumapr.com](mailto:David.Monasterio@Lumapr.com)

Attachments:

### Equipment and Components – Materials Status List

Equipment	Company/Brand	Status	Comments
PV Modules	RFPs Submitted to vendors	Proposal Received from Talesun and Trina Solar.	Interconnection Study completed and compliance with MTRs
Inverters	Ingeteam	Refresh of Proposal Received from Ingeteam to proceed with PO	Interconnection Study completed and compliance with MTRs
Battery Equipment	Vinfast/Narada	Refresh of Proposal Received from Vendors	Interconnection Study completed and compliance with MTRs
Racks and Anchoring	Schletter/Solar Mounts	Provided latest preliminary design to prospects to have them Revised Proposal	Waiting for Lond Lead Items approval
Main Switchgear	Eaton	Received proposal from Eaton and Submitted for approval	LUMA stated that Main Switchgear will remain under the contractor's prerogative. No approval necessary
GIS/GCB	Hitachi	Approved with no exceptions pending implementation	LUMA approved it requiring all to be 2000A rated.
Transformer 34.5/115K	Hitachi	Approved with no exceptions pending implementation.	Interconnection Study completed and compliance with MTRs
Meters	Eaton	LUMA submitted product and Eaton will provide it.	Interconnection Study completed and compliance with MTRs
Protective Relays, DFR and DSM	SEL	SEL relays approved. DFR and DSM waiting for approval	Interconnection Study completed and compliance with MTRs
Foundations	Pending Completion of design		
Posts & Towers	Generic	Preliminary Design submitted	
Cables & Miscellaneous	Caribe Sales	Revised proposal received. Final proposal will be delivered upon completing design	