

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

NEPR

Received:

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IN RE:

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Memorandum of Law in Support of Confidential Treatment of Exhibit 1 of Genera's "*Motion In Compliance With Resolutions And Orders Dated December 19, 2025 and January 9, 2026*" filed on January 27, 2026

MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF EXHIBIT 1 OF GENERA'S "*MOTION IN COMPLIANCE WITH RESOLUTIONS AND ORDERS DATED DECEMBER 19, 2025 AND JANUARY 9, 2026*" FILED ON JANUARY 27, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera"), as agent of the Puerto Rico Electric Power Authority ("PREPA"),¹ through its counsel of record, and respectfully submits and prays as follows:

I. Introduction

1. On December 19, 2025, the Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order titled *Genera and LUMA's October 20th, November 3rd, and November 20th Motions; Requirement to Submit Supporting Workpapers and Data* (the "December 19 Order").

2. In essence, through the December 19 Order the Energy Bureau directed Genera to file additional supporting data and workpapers for the performance metrics specified in said Order,

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* ("LGA OMA"), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority ("P3 Authority"), Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

as well as for additional performance metrics for which Genera is able to earn incentives per the LGA OMA.

3. On December 29, 2025, LUMA Energy Servco, LLC (“LUMA”) filed a motion titled *Motion Requesting Extension of Time to Comply with the December 19 Order and Submit Quarterly Report on System Data for October through December 2025*, requesting an extension of time to submit the supporting data and workpapers for the specified metrics in Attachment A of the December 19 Order, as well as its Quarterly Report on System Data for October through December 2025.

4. On January 9, 2026, the Energy Bureau issued a Resolution and Order (“January 9”) Order in which it granted LUMA’s request and extended the deadline for both LUMA and Genera to submit their respective Quarterly Reports and the additional supporting data and workpapers required under the December 19, , Order until January 27, 2026, while leaving all other deadlines unchanged.

5. On January 20, 2026, Genera filed a motion titled *Motion in Compliance with Resolution and Order issued December 19, 2025*, in which Genera complied with the Energy Bureau’s directives concerning the performance incentive metrics identified in Table 1 of the December 19 Order, resolved the reporting issues identified in the Energy Bureau’s October 7 Resolution and reiterated in Part III, Section C of the December 19 Order. Further, Genera requested an extension of time to submit the underlying data and supporting workpapers, in light of the overlapping and voluminous documentation required for both the Table 1 metrics and the metrics included in Attachment A, Table 3.

6. Further, on January 27, 2026, Genera filed a subsequent *Motion in Compliance with Resolutions and Orders dated December 19, 2025 and January 9, 2026* (“Genera’s January 27

Motion”). Through this motion, Genera filed several exhibits and requested confidential treatment pending Genera’s submission of the instant Memorandum of Law. In short, Exhibits 1 through 5 consist of the relevant underlying data and supporting workpapers requested by the Energy Bureau in relation to Table 1 and Table 3 of the above cited December 19 Order. For purposes of this Memorandum of Law, Genera submits that portions of the OSHA-related supporting workpapers submitted as **Exhibit 1** of Genera’s above cited January 27 Motion contain personal identifiers which must be protected from public disclosure, pursuant to the widely recognized right to privacy and pursuant to the LGA OMA provisions on Data Security. Accordingly, Genera respectfully submits Exhibit 1 with redactions and, as set forth below, lays out the applicable legal framework which compels the relief requested herein.

7. As anticipated in January 27 Motion, Genera respectfully submits this Memorandum of Law to request confidential treatment of Exhibit 1 (OSHA-Related Supporting Workpapers) of Genera’s “*Motion In Compliance With Resolutions And Orders Dated December 19, 2026 And January 9, 2026*” filed on January 27, 2026, resubmitted herein with redactions pursuant to the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended (“the Energy Bureau’s Policy on Confidential Information”), for the grounds stated herein.

II. Identification of Confidential Information

8. Confidential Information table:

Document Name and File Date	Pages in which Confidential Information is Found, if applicable	Summary of Legal Basis for Confidential Designation, if applicable	Summary of why each claim or designation conforms to the applicable legal basis for confidentiality
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<p>Exhibit 1 - OSHA-related supporting workpapers</p>	<p>Various redactions of PII throughout pages 1 through 14</p>	<p>Right to Privacy; LGA OMA</p>	<p>Non-public, personally identifiable information (PII) of Genera’s employees and/or officials, and right to privacy, warranting non-disclosure of names, signatures, phone numbers, email addresses and/or other personal identifiers.</p> <p>Public disclosure of phone numbers, signatures, email addresses and other information system identifiers poses a direct risk of phishing, spoofing, or other cybersecurity breaches that directly compromise the operations and maintenance services of Critical Energy Infrastructure, as well as expose the individuals, organization and national power grid to cybersecurity threats.</p> <p>Section 13.3 of the LGA OMA (“Data Security”) requires Operator comply and implement reasonable safeguards regarding data security, cybersecurity and information security with regards to Facility Information and Information Systems.</p> <p>The need to mitigate and prevent cyberattacks directed towards the listed officers and their phone numbers or email addresses that could breach Operator’s information systems and emails, sensitive data, and retrieve and disclose</p>
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			Facility Information, Owner Personal Information, and Owner Intellectual Property, as defined in Section 1.1 of the LGA OMA.
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III. Applicable Law and Grounds in Support of Confidential Treatment

A. *Puerto Rico Energy Transformation and RELIEF Act and the Energy Bureau’s Policy on Management of Confidential Information*

9. The governing statute for the management of classified information submitted to the Energy Bureau is Section 6.15 of Act No. 57-2014, also known as the *Puerto Rico Energy Transformation and RELIEF Act*. This section stipulates that "[i]f any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted carries a confidentiality privilege, such person may request the [Bureau] to treat such information as confidential..." 22 L.P.R.A. § 1054n. If, after conducting a meticulous evaluation, the Energy Bureau determines that the information warrants protection, it is required to "grant such protection in a manner that minimally affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* at Section 6.15(a).

10. Consequently, such information must be withheld from the public domain by the Energy Bureau and "must be duly safeguarded and provided exclusively to the personnel of the Energy [Bureau] who need to know such information under nondisclosure agreements." *Id.* at Section 6.15(c). Therefore, "[t]he Energy [Bureau] must swiftly act on any privilege and confidentiality claim made by a person under its jurisdiction through a resolution for such purposes before any potentially confidential information is disclosed." *Id.* at Section 6.15(d).

11. Additionally, the Energy Bureau's Policy on Confidential Information details the procedures a party should follow to request confidential treatment for a document or a portion of it. Said policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* Section A of the Energy Bureau's Policy on Confidential Information. The memorandum should also include a table that identifies confidential information, a summary of the legal basis for the confidential designation, and an explanation of why each claim or designation conforms to the applicable legal basis for confidentiality. *Id.* The party seeking confidential treatment of information filed with the Energy Bureau must also file both a "redacted" (or "public") version and an "unredacted" (or "confidential") version of the document that contains confidential information. *Id.*

B. Right to Privacy

12. Portions of the OSHA-related supporting workpapers filed as Exhibit 1, as identified in Part II of this memorandum, contain personal identifiers, including officer names, phone numbers, signatures and potential email address identifiers. Accordingly, Genera respectfully requests that this protected information be maintained as confidential, as its disclosure could create a risk of misuse. Preserving the confidentiality of this personal and sensitive information is in the public interest and is consistent with Puerto Rico's legal framework on privacy, which protects against the disclosure of personal information. *See e.g.*, Const. ELA, Art. II, Sections 8 and 10, which protect the right to control personal information and distinctive traits, and which apply *ex proprio vigore* and against private parties. *See also e.g.*, *Vigoreaux v. Quiznos*, 173 DPR 254, 262 (2008); *Bonilla Medina v. P.N.P.*, 140 DPR 294, 310–11 (1996); *Pueblo v. Torres Albertorio*, 115 DPR 128, 133–34 (1984). *See also*, Article 4(vi) of the "Puerto Rico Open

Government Data Act,” Act No. 122-2019, 3 LPRA § 9894 (2025) (applicable to private persons private individuals who perform public functions and services, which lists as an exception to public disclosure, “[i]nformation that, if disclosed, could constitute an invasion of privacy of a third party, or impair the fundamental rights of said third party”).

C. LGA Operation and Maintenance Agreement

13. In addition to the above, pursuant to the LGA Operation and Maintenance Agreement (the “LGA OMA”), Genera is contractually bound to protect sensitive and confidential information from unauthorized disclosure. Section 13.3 (“Data Security”) of the LGA OMA expressly requires Genera to comply and implement reasonable safeguards regarding data security, cybersecurity and information security in respect to the Facility Information and Information Systems, as defined in the LGA OMA.

14. Disclosure of internal Operator email addresses, identifiers and phone numbers, particularly of high-level personnel, directly contravenes this obligation. Phone numbers and email addresses constitute of the Operator’s officials are points of access to the Operator’s Information Systems, a term defined under Section 1.1 to include: “a discrete set of electronic information resources organized for the collection, processing, maintenance, use, sharing, dissemination or disposition of electronic information...”.

15. Related to the above, Section 1.1 LGA OMA also defines “Cybersecurity Breach” means any successful act to gain unauthorized access to, disrupt or misuse an Information System or information stored on such Information System”.

16. Lastly, the potential for a cybersecurity breach of the Operator’s information systems via unauthorized access to phone number data or email addresses would have immediate consequences regarding nonpublic information, commercially sensitive information, personally

identifiable information, and overall Facility Information, Owner Personal Information, and Owner Intellectual Property, as defined in Section 1.1 of the LGA OMA. Additionally, it would compromise the confidentiality of Critical Energy Infrastructure Information (“CEII”), which federal statutes define CEII as:

[S]pecific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act (“FOIA”), 5 U.S.C. 552; and (iv) does not simply reveal the general location of the critical infrastructure."

18 CFR 388.113(c)(2).

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the above Memorandum of Law and **GRANT** its request for confidential treatment of **Exhibit 1 (OSHA-related Supporting Workpapers)** of Genera’s motion filed on January 27, 2026, titled *Motion in Compliance with Resolutions and Orders Dated December 19, 2025 and January 9, 2026*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of February of 2026.

ECIJA SBGB
PO Box 363068
San Juan, Puerto Rico 00920
Tel. (787) 300.3200
Fax (787) 300.3208

(Signatures page follows.)

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo
jfr@sbgblaw.com
TSPR 9,669

/s/ Stephen David Romero Valle
Stephen David Romero Valle
sromero@sbgblaw.com
RUA No. 21,881

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso
jdiaz@sbgblaw.com
TSPR 21,718

CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com; mvalle@gmlex.net; alexis.rivera@prepa.pr.gov; hrivera@jrsp.pr.gov; nzayas@gmlex.net; rcruzfranqui@gmlex.net; katiuska.bolanos-lugo@us.dlapiper.com; legal@genera-pr.com ; regulatory@genera-pr.com.

In San Juan, Puerto Rico, this 3rd day of February of 2026.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ Stephen David Romero Valle
Stephen David Romero Valle

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

**Redacted public version of Exhibit 1
of Genera’s “*Motion in Compliance with Resolutions and Orders dated December 19, 2025
and January 9, 2026*”, filed on January 27, 2026**

OSHA's Form 300A (Rev. 01/2004) Summary of Work-Related Injuries and Illnesses

Year 2025
 U.S. Department of Labor
 Occupational Safety and Health Administration
 Form approved OMB no. 1218-0175

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of... (M)			
(1) Injury	0	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	0	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name Genera PR- Aguirre Ciclo Combinado

Street Bo. Montesoria KM 152.3 Int

City Salinas State Puerto Rico Zip 00704

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 33

Total hours worked by all employees last year 83,360.00

Sign here _____

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive

Phone

Gerente de Planta
Title

Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>2</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>8</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>2</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor OSHA Office of Statistics Room N-3644 200 Constitution Ave NW Washington DC 20210 Do not send the completed forms to this office.

Establishment information

Your establishment name Genera PR- Turbinas de Gas Cambalache

Street _____

City Arecibo State Puerto Rico Zip 00612

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 35

Total hours worked by all employees last year 72,800.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive

Phone

Gerente de Planta Oeste
Title

8 de enero de 2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OMB no. 1218-0178

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	2	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
67	0
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	2	0	0	0	0	0

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Establishment Information

Your establishment name Genera PR- Central Costa Sur

Street Carr 127 Km. 15.3

City Guayanilla State Puerto Rico Zip 00656

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 338212)
2 2 1 1 1 2

Employment Information

Annual average number of employees 136

Total hours worked by all employees last year 282,880.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Gerente de Planta
Title

Jan 7, 26
Date

Phone

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>1</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)			
(1) Injury	<u>1</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Condition	<u>0</u>	(6) All Other Illnesses	<u>0</u>

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Establishment information

Your establishment name Genera PR- Central Generatriz Palo Seco

Street carr 155 km 31.8 Central Palo Seco

City Toa Baja State Puerto Rico Zip 00856

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 105

Total hours worked by all employees last year 218,400.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted]
Company executive

[Redacted]
Phone

Gerente de Planta
Title

8/06/2025/2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	<u>0</u>
(2) Skin Disorder	<u>0</u>
(3) Respiratory Condition	<u>0</u>
(4) Poisoning	<u>0</u>
(5) Hearing Loss	<u>0</u>
(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name Genera PR- Peakers Palo Seco

Street carr 165 KM 31.8 Central Palo Seco

City Palo Seco State Puerto Rico Zip 00656

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 5

Total hours worked by all employees last year 10,400.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted Signature]
Company executive

[Redacted Phone]
Phone

Gerente de Planta
Title

01-feb-2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	0
(2) Skin Disorder	0
(3) Respiratory Condition	0
(4) Poisoning	0
(5) Hearing Loss	0
(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name Genera PR- Culebra
 Street Culebra
 City Culebra State Puerto Rico Zip 00775
 Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion
 Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1
 OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 1
 Total hours worked by all employees last year 2,080.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Signature]
 Company executive
[Phone Number]
 Phone

Gerente de Planta
 Title
01-Feb-2026
 Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the log. If you had no cases write "0."

Employees former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR 1904.35, in OSHA's Recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	<u>0</u>
(2) Skin Disorder	<u>0</u>
(3) Respiratory Condition	<u>0</u>
(4) Poisoning	<u>0</u>
(5) Hearing Loss	<u>0</u>
(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave. NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name Genera PR- Daguao

Street Bo Aguas Claras

City Ceiba State Puerto Rico Zip 00735

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 4

Total hours worked by all employees last year 8,320.00

Sign here _____

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Signature]
Company executive

[Redacted]
Phone

Gerente de Planta
Title

01-Feb-2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of... (M)			
(1) Injury	0	(4) Poisoning	0
(2) Skin Disorder	0	(5) Hearing Loss	0
(3) Respiratory Condition	0	(6) All Other Illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

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Establishment information

Your establishment name Genera PR- Peakers Jobs

Street Carr. PR 3 Km 142

City Guayama State Puerto Rico Zip 00784

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

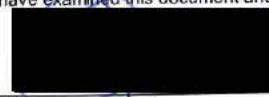
Annual average number of employees 6

Total hours worked by all employees last year 12,480.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.



 Company executive



 Phone

Gerente de Planta
 Title

01-Feb-2026
 Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	
(1) Injury	<u>0</u>
(2) Skin Disorder	<u>0</u>
(3) Respiratory Condition	<u>0</u>
(4) Poisoning	<u>0</u>
(5) Hearing Loss	<u>0</u>
(6) All Other Illnesses	<u>0</u>

Post this Summary page from February 1 to April 30 of the year following the year covered by the form

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Establishment information

Your establishment name Genera PR- Peakers VIEQUES
 Street _____
 City VIEQUES State Puerto Rico Zip 00765
 Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion
 Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1
 OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 1
 Total hours worked by all employees last year 2,080.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted Signature]
 Company executive
[Redacted Phone]
 Phone

Gerente de Planta
 Title
01-feb-2026
 Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)			
(1) Injury	<u>0</u>	(4) Poisoning	<u>0</u>
(2) Skin Disorder	<u>0</u>	(5) Hearing Loss	<u>0</u>
(3) Respiratory Condition	<u>0</u>	(6) All Other Illnesses	<u>0</u>

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Establishment information

Your establishment name Genera PR- Peakers Yabucoa

Street Bo Candelerio Arriba

City Humacao State Puerto Rico Zip 00791

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 5

Total hours worked by all employees last year 10,400.00

Sign here _____

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Signature]
Company executive

Gerente de Planta
Title

[Redacted]
Phone

01-Feb-2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025 

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>0</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

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Establishment information

Your establishment name Genera PR- Planta Mayaguez

Street 3341 Sector Portuaria

City Mayaguez State Puerto Rico Zip 00680

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 19

Total hours worked by all employees last year 30,720,00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted Signature]
Company executive

Gerente de Planta Oeste
Title

[Redacted Phone]
Phone

8 de enero de 2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>1</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>12</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>1</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

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Establishment information

Your establishment name Genera PR- Oficina Corporativa

Street 250 Ave Muñoz Rivera American Plaza

City San Juan State Puerto Rico Zip 00918

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 91

Total hours worked by all employees last year 189,280.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted]
Company executive

Gerente S.O
Title

[Redacted]
Phone

1/8/2026
Date

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 2025



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
<u>0</u>	<u>3</u>	<u>0</u>	<u>0</u>
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
<u>17</u>	<u>0</u>
(K)	(L)

Injury and Illness Types

Total number of... (M)	(1) Injury	(2) Skin Disorder	(3) Respiratory Condition	(4) Poisoning	(5) Hearing Loss	(6) All Other Illnesses
	<u>4</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

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Establishment information

Your establishment name Genera PR- Central Generatriz San Juan

Street Calle Mercado Central Lote 28 Zona Portuaria

City San Juan State Puerto Rico Zip 00656

Industry description (e.g., Manufacture of motor truck trailers)
Industria de Generacion

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)
4 9 1 1

OR North American Industrial Classification (NAICS), if known (e.g., 336212)
2 2 1 1 1 2

Employment information

Annual average number of employees 106

Total hours worked by all employees last year 220,480.00

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

[Redacted]
Company executive

[Redacted]
Phone

Gerente de Planta
Title

1-14-2026
Date