

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

**NEPR**  
**Received:**  
**Feb 23, 2026**  
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**IN RE:**

REVIEW OF GENERA PR, LLC  
REQUEST TO OPERATE PALO SECO  
MP AND MAYAGÜEZ CT WITH  
NATURAL GAS AS PRIMARY FUEL

**CASE NO.:** NEPR-MI-2024-0004

**SUBJECT:** Motion to Submit Report in  
Compliance with Resolution and Order  
Issued on January 23, 2026

**MOTION TO SUBMIT REPORT IN COMPLIANCE WITH RESOLUTION AND  
ORDER ISSUED ON JANUARY 23, 2026**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsel of record, and respectfully states and requests the following:

1. On January 31, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order, titled Resolution and Order for Request for Leave to Operate Palo Seco MP with Natural Gas as Primary Fuel (“January 31st Resolution”), finding that Genera’s response did not satisfy the conditions outlined in the October 11, 2024 Resolution and Order. Consequently, and based on additional reasoning set forth in a subsequent January 31st Resolution concerning the Mayagüez CTs, the Energy Bureau—while reaffirming the conditional approval of the Palo Seco MPs’ conversion—declared null and void the October 11, 2024 Resolution and Order

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<sup>1</sup> Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships 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 PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

and imposed additional conditions that Genera was to now satisfy to secure final approval of the Palo Seco MPs conversion.

2. On December 17, 2025, Genera filed a Motion titled *Motion to Inform Compliance with Conditional Approval and to Request Authorization for Testing and Commissioning Procedures for Fuel Swapping Conversion at Palo Seco* (“December 17th Motion”), through which Genera informed the Energy Bureau of its compliance with the applicable conditions and detailing the actions undertaken to satisfy the January 31st Resolution, including the status of the natural gas supply arrangements, the availability of the regasification infrastructure, and confirmation that the Palo Seco MPs were capable of operating on natural gas without requiring material modifications or additional ratepayer-funded investment. Genera further requested authorization to initiate the necessary testing and commissioning procedures.

3. On December 22, 2025, the Energy Bureau issued a Resolution and Order titled *Resolution and Order for Request for Leave to Operate Palo Seco MP with Natural Gas as Primary Fuel* (“December 22nd Resolution”) through which it ordered Genera to provide a copy of the Multisite LNG Supply Contract with its corresponding attachments, as well as a detailed explanation describing how Genera has satisfied each condition set forth in the January 31st Resolution for Palo Seco MPs. Additionally, the Energy Bureau ordered a Virtual Hearing for January 14, 2026, to address and clarify any pending issues after receiving Genera’s responses. Any subsequent hearings, if deemed necessary, would be scheduled on a tentative basis at the Energy Bureau’s discretion.

4. In compliance with the December 22nd Resolution, on December 23, 2025, Genera filed a Motion titled *Motion to Provide Information Requested for the Fuel Swapping*

*Conversion at Palo Seco in Compliance with Resolution and Order issued December 22, 2025* (“December 23rd Motion”), addressing the directives set forth in said Resolution and Order.

5. On January 9, 2026, the Energy Bureau issued a Resolution and Order titled *Resolution and Order on Genera’s December 17 Motion*, through which it canceled the previously scheduled Virtual Hearing upon determining that Genera’s responses submitted through the December 23rd Motion were sufficient.

6. Consequently, on January 16, 2026, Genera filed a Motion titled *Motion to Inform Compliance with Conditional Approval and to Inform Commencement of Commissioning and Operating Procedures for Fuel Swapping Conversion at Palo Seco MPs* (“January 16th Motion”), through which Genera informed the Energy Bureau of its compliance with the conditions established in the January 31st Resolution and its intent to commence operations using natural gas at the Palo Seco MPs.

7. Subsequently, on January 23, 2026, the Energy Bureau issued a Resolution and Order titled *Resolution and Order on Genera’s December 17 Motion and December 23 Motion* (“January 23rd Order”), authorizing the testing and commissioning of the Palo Seco MPs using natural gas and, *inter alia*, ordering Genera to file, within thirty (30) days from notification of said Order, as specified in Part III(D) thereof, a detailed report identifying and supporting all costs incurred in connection with the conversion-related work reflected in the cost breakdown, including complete documentation evidencing: (i) how and when each cost was incurred, (ii) who paid each such cost, and (iii) a certification that none of these costs were paid using Genera’s operating budget. Moreover, the January 23rd Order also required Genera to further certify that all equipment installed is owned by PREPA and to identify how

such ownership has been established and documented, unless Genera demonstrates that such equipment constitutes an integral and inseparable part of NFE's regasification infrastructure and that, for any reason, title to such equipment cannot be transferred to PREPA.

8. In compliance with Part III(D) of the January 23rd Order, Genera respectfully submits, as *Exhibit A* to this Motion, the *Report in Compliance with the January 23rd Order*.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera's Report submitted as *Exhibit A* to this Motion; and **deem** Genera to be in compliance with the January 23rd Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of February 2026.

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## CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov); [cruzfrangui@gmlex.net](mailto:cruzfrangui@gmlex.net); [mvalle@gmlex.net](mailto:mvalle@gmlex.net) and [nzayas@gmlex.net](mailto:nzayas@gmlex.net).

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of February 2026.

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso  
José Javier Díaz Alonso

**Exhibit A**

Report in Compliance with the January 23rd Order

Docket Number: NEPR-MI-2024-0004

In Re: Review of Genera PR LLC Request to Operate Palo Seco MP and Mayaguez CT with Natural Gas as Primary Fuel

RE: Report in Compliance with the January 23<sup>rd</sup> Resolution and Order

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In the Resolution and Order issued on January 23, 2026, the Puerto Rico Energy Bureau (“PREB”) ordered Genera PR LLC (“Genera”) to submit a detailed report identifying and supporting all costs incurred in connection with conversion related work at the Palo Seco Power Plant, including documentation evidencing how and when each cost was incurred, who paid each cost, a certification that none of the costs were paid using Genera’s operating budget, and a certification regarding ownership of all equipment installed as part of the conversion.

The operation of the Mobile Packs (“MPs”) at the Palo Seco Power Plant officially commenced on February 4, 2026. Prior to that date, activities were limited to technical verification, commissioning support, and operational readiness efforts required to ensure the safe and reliable operation of the units on natural gas as the primary fuel and Ultra Low Sulfur Diesel (“ULSD”) as the backup fuel.

The total cost incurred in connection with these activities was \$164,367.05, and such costs were incurred using Genera’s operating budget. These costs were reasonable, necessary, and directly related to Genera’s contractual and operational obligations as the operator of the MPs. As part of its responsibility to ensure safe and reliable operations, Genera was required to confirm the capability of the units to operate on both fuels (ULSD and natural gas), support the execution of the fuel swap process, and conduct the initial operation of the units on natural gas. Genera’s operating personnel had not previously operated these units on natural gas, as the units had historically operated on ULSD, and therefore specialized technical support was required to perform and

supervise the operation and to ensure compliance. The incurrence of these costs reflects standard operational due diligence.

The MP units were manufactured “gas ready” and all MP units components are PREPA owned. However, regarding the regasification infrastructure and piping, Genera cannot certify that all equipment installed as part of the conversion is owned by PREPA.. When gas piping was installed to serve the TM2500 units, the supplier installed, at its own cost, the piping and regasification infrastructure required to serve the MPs. As a result, certain components associated with the gas infrastructure were installed by the supplier and are not owned by PREPA. Accordingly, certain equipment constitutes an integral and inseparable part of the supplier’s regasification and gas delivery infrastructure, and title to such equipment cannot be transferred to PREPA.