Annex A

NEPR

Received:

Mar 20, 2026

10:18 PM

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.1

SUBJECT

March 16, 2026 FCA, PPCA & FOS Proposed Factors

REQUEST

1.1. Have any errors or revisions been identified by Genera or LUMA that affect the FCA, PPCA and FOS rates for April through June 2026 that have been proposed by LUMA in its March 16, 2026 Motion and supporting documents?

a. If “yes” please identify, quantify and explain each correction and revision to those rates that has been identified.

RESPONSE

LUMA has not identified any errors or revisions that would affect the Fuel Charge Adjustment (FCA), Purchased Power Charge Adjustment (PPCA), or Fuel Oil Subsidy (FOS) rates for the April–June 2026 period as set forth in LUMA’s March 16, 2026 Motion[1] and the supporting documentation submitted therewith.

[1] LUMA’s Motion on April to June 2026 Proposed factors dated March 16, 2026, Docket No. NEPR-MI-2020-0001.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.2

SUBJECT

Fuel and Purchased Power Costs

REQUEST

1.2. Were the forecasts for fuel and purchased power costs for April through June 2026 prepared before the start of the Iran Conflict?

RESPONSE

No. In accordance with the quarterly reconciliation process, the fuel and purchased power cost forecasts for April through June 2026 were submitted to the Puerto Rico Energy Bureau (PREB) on March 16, 2026. As the Iran conflict commenced at the end of February, the subsequent escalation in global energy prices and geopolitical risks were, to the extent possible at that time, known at the time of the analysis and LUMA utilized information provided by Genera PR and other Independent Power Producers (IPP). Consequently, the proposed factors were adjusted to reflect these market realities and the information that LUMA had at the time and the information received from Genera PR until March 10.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.3

SUBJECT

Fuel and Purchased Power Costs

REQUEST

1.3. Were the forecasts for fuel and purchased power costs for April through June 2026 prepared before President Trump exemption to the Jones Act.

RESPONSE

Yes. The fuel and purchased power cost forecasts for the period of April through June 2026 was finalized on March 12, 2026. As the Presidential exemption to the Jones Act was not approved and announced on March 18, 2026, it constitutes a subsequent event that occurred after the formal analysis and modeling phase were completed.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.4

SUBJECT

Fuel and Purchased Power Costs

REQUEST

1.4. Have the system fuel and purchased power costs for March 2026 increased due to the Iran Conflict or from other factors? If yes, please identify the increases quantified to date and provide an explanation.

RESPONSE

At this time, it is not possible to fully quantify the specific impact of the Iran Conflict on system fuel and purchased power costs for March 2026. The most recent Fuel Forecast received from Genera on March 20th (Figure 1.4-2) does show that fuel prices for the month will be higher than the forecasted fuel prices used in the January 2026 to March 2026 FCA Forecast (Figure 1.4-1). However, actual expenditures and the impact of increasing fuel prices cannot be determined at this time.

Figure 1.4-1. Genera PR Fuel Prices Forecast Calculation

GeneraPR

FUELS DEPARTMENT

Fuel Prices Forecast Calculation

Date	20-nov-25					
	ULSD		Fuel Oil #6	NFE	NFE - GSA	Naturgy
month	$/Bbl Barge Delivery	$/Bbl Tank Truck Delivery	$/Bbl	$/MMBtu	$/MMBtu	$/MMBtu
mar-26	$104.11	$105.11	$80.96	$10.97	$12.42	$9.97

Figure 1.4-2. Genera PR Fuel Prices Forecast Calculation

GeneraPR

FUELS DEPARTMENT

Fuel Prices Forecast Calculation

Date	20-mar-26					
	ULSD		Fuel Oil #6	NFE (SJ 5&6)	NFE - GSA (PS-SJ TM's, other)	Naturgy (Eco & Costa Sur)
month	$/Bbl Barge Delivery	$/Bbl Tank Truck Delivery	$/Bbl	$/MMBtu	$/MMBtu	$/MMBtu
mar-26	$157.30	$158.30	$108.44	$9.91	$11.36	$8.91

In accordance with the established regulatory reporting cycle, actual values for fuel consumption, fuel mix, and purchased power for the month of March are provided by Genera PR and the Independent Power Producers (IPPs) on a monthly basis. LUMA expects to receive and process this validated data during the first half of April 2026.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.5

SUBJECT

Fuel and Purchased Power Costs

REQUEST

1.5. Are the system fuel and purchased power costs for April through June 2026 expected by Genera or LUMA to increase significantly above the amounts used in LUMA's March 16, 2026 Motion due to the Iran Conflict or from other factors? If yes, please identify the currently expected increases and provide an explanation. If not, explain why not.

RESPONSE

LUMA is currently unable to confirm whether system fuel costs will increase significantly above the March 16, 2026 motion[2]. Any potential adjustment to the forecast requires updated fuel price projections from Genera PR.

[2] LUMA's Motion of March 16, 2026, Docket No. NEPR-MI-2020-0001.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.6

SUBJECT

Fuel and Purchased Power Costs

REQUEST

1.6. Are the system fuel and purchased power costs for April through June 2026 expected by Genera or LUMA to decrease significantly below the amounts used in LUMA's March 16, 2026, Motion due to the exemption granted by President Trump to the Jones Act or from other factors? If yes, please identify the currently expected decrease and provide an explanation. If not, explain why not.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.7

SUBJECT

Fuel Delivery

REQUEST

1.7. Is Genera experiencing problems or delays in getting fuel delivered? If so, please explain, providing specifics of fuel delivery issues that LUMA or Genera are experiencing.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.8

SUBJECT

Fuel Delivery

REQUEST

1.8. Is Genera expecting problems or delays in fuel deliveries during the March through June 2026 period? If so, please explain, providing specifics of expected fuel delivery issues. Also, specify and explain any contingency plans to assure that sufficient fuel will be delivered to the system during those months to avoid having outages attributable to insufficient fuel availability.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.9

SUBJECT

Force Majeure

REQUEST

1.9. Have Genera or PREPA received force majeure notifications from any fuel suppliers or transporters or from power suppliers so far in 2026? If so, please identify and provide a copy of each such force majeure notification.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.10

SUBJECT

Transmission System Outages

REQUEST

1.10. During the reconciliation months of December 2025 through February 2026:

a. Were there any transmission system outages that prevented generation from being supplied to serve electric load?

If the answer to part a is “yes” identify each transmission system outage in each month, December 2025, January 2026 and February 2026, that affected the system’s ability to transmit power generated and purchased to serve electricity demand. Also explain the cause of each such transmission outage and identify, quantify and explain how it affected fuel and purchased power costs in July and August 2025. Include supporting calculations.

RESPONSE

No transmission system outages prevented generation from being supplied to serve electric load from December 2025 through February 2026.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.11

SUBJECT

Unplanned or Forced Outages

REQUEST

1.11. During the reconciliation months of December 2025 through February 2026:

a. Were any generating units unavailable due to unplanned or forced outages?

b. If the answer to part a is “yes” identify each forced/unplanned outage in December 2025, January 2026 and February 2026 by generating unit, date, time and duration. Also explain the cause of each such outage and identify, quantify and explain how it affected fuel and purchased power costs for each month. Include supporting calculations.

c. For the forced/unplanned outages identified in response to part b does LUMA or Genera have any analysis, calculations or estimates of the impact on monthly fuel costs and monthly purchased power costs related to those outages, including estimates of the amounts of fuel costs saved by not running the units that experienced the forced outages, and estimates of the additional costs for the replacement power? If not, explain why not.

d. If the response to part c is “yes” please identify and provide the analyses, calculations and estimates that LUMA and Genera have relating to the impact of those forced/unplanned outages on monthly fuel cost and monthly purchased power cost for December 2025, January 2026 and February 2026.

e. For the forced/unplanned outages identified in prior responses does LUMA or Genera have any analysis of the cause of those outages? If not, explain why not.

f. If the response to part e is “yes” please identify and analyze the causes of each of those forced/unplanned outages.

RESPONSE

Insert response

a. Yes.

b. For this response, please see the table and explanation below.

Permanent Rate

Table 1.11-1. December 2025, January & February 2026 Unplanned or Forced Outages

Units	Date	Start Time	End Time	Duration	Cause (as reported by Genera PR or IPP)
Palo Seco 4	11-Dec	11/12/25 3:41 AM	12/12/25 4:19 AM	1 day & 38 min	Cause of trip was loss of bunker c pump due to low voltage.Genera PR also informed that they will be doing a balance of the IDF 4-2, if it is successful, unit will come back to service with availability of 170 MW.
Costa Sur 6	1-Dec	1/12/25 12:28 PM	5/12/25 3:30 PM	4 days & 3 hours with 2 min	Due to boiler rupture and tripped with 38 MW 1/12/25 at 12:28 h.
Aguirre 2	8-Dec	8/12/25 10:38 AM	15/12/2025 2:27 PM	7 days & 3 hours with 49 min	Boiler Rupture.
San Juan 5	23-Dec	23/12/25 4:31 PM	23/12/2025 6:18 PM	1 hour & 47 min	Due to circulation pump trip.
San Juan 6	16-Dec	16/12/25 8:36 AM	23/12/2025 6:18 PM	7 days & 9 hours with 42 min	Unit experienced a forced outage today at 08:36 h for combustion inspection.
Eco Electrica	2-Dec	2/12/25 8:49 AM	2/12/25 10:28 AM	1 hour & 39 min	CT 1 experienced a forced outage 2/12/25 at 08:49 h due to malfunction during the weekly DC lubrication pump test. A lube oil pressure switch malfunctioned, indicating a false low pressure reading. The faulty pressure switch was left in bypass mode and will be replaced.
Eco Electrica	3-Dec	3/12/25 12:57 PM	3/12/25 3:07 PM	2 hour & 10 min	CT 1 experienced a forced outage 3/12/25 at 12:57:52 h due to human error.
AES 2	14-Dec	10/12/25 10:57 AM	21/12/2025 6:28 AM	10 days & 19 hours with 31 min	Unit experienced forced outage 10/12/25 at 10:57 h due to water leak in fire bed heat exchanger (FBHE).
Units	**Date**	**Start Time**	**End Time**	**Duration**	**Cause (as reported by Genera PR or IPP)**
Costa Sur 5	11-Jan	11/1/26 6:18 PM	25/1/2026 9:34 PM	14 days & 3 hours with 16 min	Unit is not available 11/1/26 at 18:18 h due to water leak was identified in a water heater valve during the unit's start up process.
Costa Sur 5	27-Jan	27/1/26 10:52 PM	2/2/26 9:31 PM	5 days & 22 hours with 39 min	Unit experienced a controlled forced outage 27/1/26 at 22:52 h due to boiler rupture.
Aguirre 2	3-Jan	3/1/26 12:28 PM	3/1/26 10:58 PM	10 hour & 30 min	Unit experienced a forced outage 3/1/26 at 12:28 h due to instrumentation air compressor loss.
San Juan 5 CT	21-Jan	21/1/26 11:07 AM	21/1/26 12:09 PM	1 hour & 2 min	Unit tripped 21/1/26 at 11:07 h due to human error.
San Juan 5 STM	21-Jan	21/1/26 11:07 AM	26/1/26 08:49 AM	4 days & 21 hours with 42 min	Unit tripped 21/1/26 at 11:07 h due to human error. Leak in control valves oil system was repaired with silicon and is in drying process. Unit tried synchronizing 25/1/26 at 14:19 h but failed.Has problems with intercepting valve.

Permanent Rate

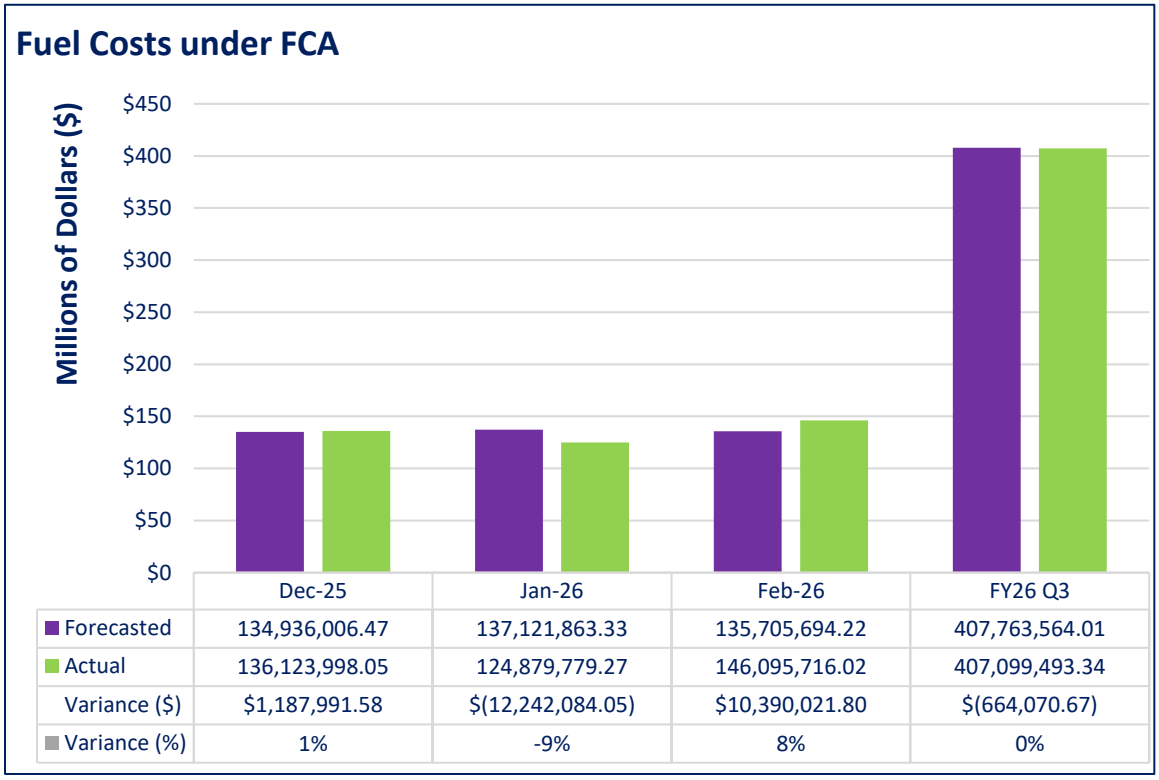
San Juan 5 CT	27-Jan	27/1/26 5:10 AM	27/1/26 8:29 AM	3 hour & 19 min	CT 5 tripped due to the unstable condition caused from STG 5 trip, and the operator could not control operational parameters of the unit
San Juan 5 STM	27-Jan	27/1/26 4:40 AM	27/1/26 1:09 PM	8 hour & 29 min	Genera PR Northern Operations Director informed preliminary cause of trip was that a vacuum pump decoupled from the motor. The motor did not trip and that caused that the open/close valve logic did not start which caused the trip of STG 5
AES 2	1-Jan	1/1/26 6:56 AM	2/1/26 1:48 AM	18 hour & 52 min	Unit 2 experienced a controlled forced outage 1/1/26 at 06:56 h due to high temperatures of fluid gases & air heaters problems.
San Juan 9	30-Jan	30/1/2026 12:40 AM	30/1/2026 9:04 AM	8 hour & 24 min	Unit experienced a forced outage 30/1/26 at 00:40 h due to problems with exciter
Units	**Date**	**Start Time**	**End Time**	**Duration**	**Cause (as reported by Genera PR or IPP)**
Costa Sur 5	2-Feb	2/2/26 7:37 PM	2/2/26 11:37 PM	8 hour	Unit experienced a forced outage 2/2/26 at 19:37 h due to field ground protection.
Aguirre 2	6-Feb	6/2/26 12:40 AM	9/2/26 10:03 AM	3 days & 9 hours with 23 min	Unit experienced a controlled forced outage 6/2/26 at 00:40 h due to boiler rupture.
Aguirre 2	24-Feb	24/2/26 4:50 AM	3/3/26 9:42 AM	7 days & 4 hours with 52 min	Unit experienced a controlled forced outage 24/2/26 at 04:50 h due to rupture in the boiler in the waterwall area.
San Juan 5 CT	7-Feb	7/2/26 12:07 AM	7/2/26 3:25 PM	15 hour & 18 min	CT unit experienced a forced outage at 12:07 h due that the unit was destabilize after the Steam unit trip.
San Juan 5 STM	7-Feb	7/2/26 12:02 AM	10/2/26 2:03 PM	3 days & 13 hours with 56 min	Steam unit experienced a forced outage 10/2/26 at 12:02 h due to vibrations
San Juan 5 STM	10-Feb	10/2/26 4:40 PM	16/2/2026 1:05 PM	5 days & 20 hours with 25 min	Unit experienced controlled forced outage due to high vibrations 10/2/26 at 16:40 h.
San Juan 9	15-Feb	15/2/26 7:30 AM	19/2/2026 9:12 AM	4 days & 1 hours with 42 min	Unit tripped 15/2/26 at 7:30 h due to a boiler rupture.
Palo Seco 4	17-Feb	17/2/26 11:02 PM	18/2/26 2:02 PM	15 hour	Unit tripped 17/2/26 at 23:02 h with approximately 160 MW. As informed by Genera PR Operations Director, the trip on Tuesday night was due to fail of the air conditioning of the room where the Mark VI control system resides, which caused high temperature in the control system and sent wrong signals to the turbine protections.

During each month of December 2025, January 2026, and February 2026 no forced outage event was a primary driver for variance from forecasted to actual Fuel and Purchased Power Costs. The graphs below show the forecasted vs actual variance for Fuel and Purchased Power Costs each of the three months, and in each case there were other system characteristics that contributed to the variance from forecasted values.

Permanent Rate

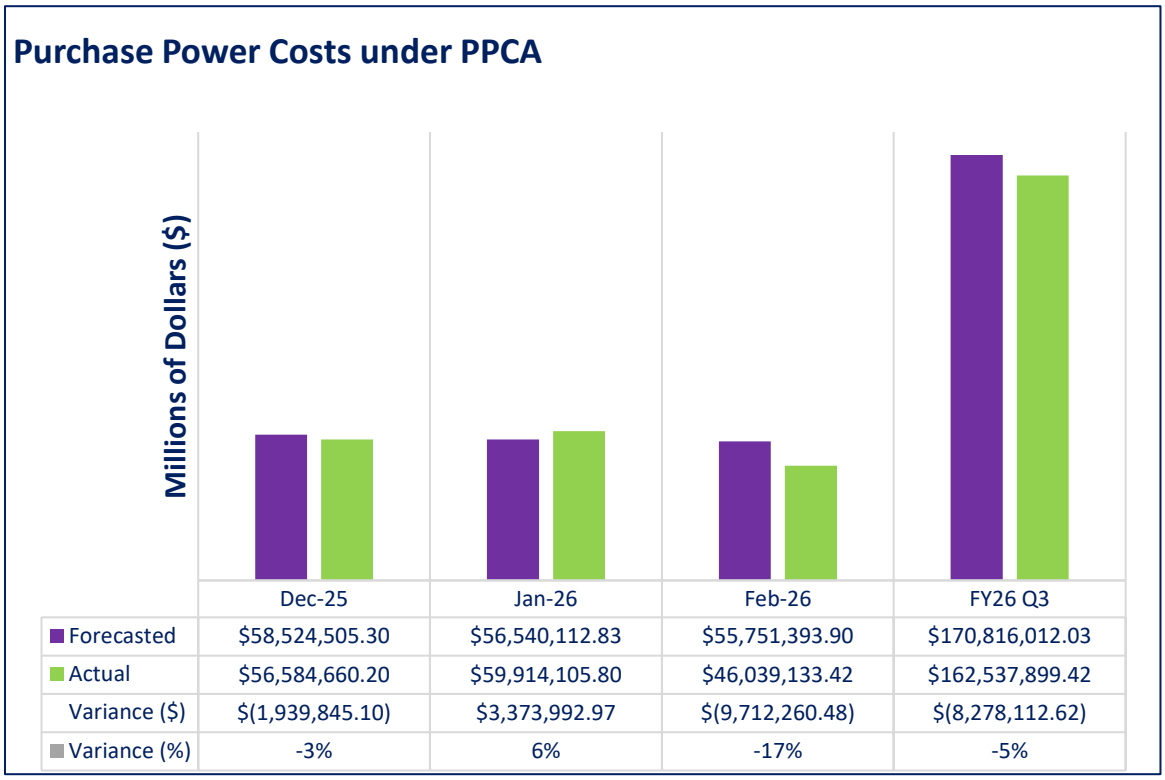
In December 2025, both Fuel Charge Adjustment (FCA) and Purchased Power Costs were closely aligned with forecasted values. In January 2026, lower than forecasted fuel prices as the primary driver for below forecasted FCA Costs while above forecasted availability at AES led to increased Puchased Power Costs. In February 2026, above forecasted fuel prices was the primary contributor to an increase in FCA Costs rather than the impact of any forced outage, and a maintenance outage at AES 2 was the primary driver for the below forecasted Purchased Power Cost.

Figure Error! No text of specified style in document.**.11-2. Fuel Costs under FCA**



	Dec-25	Jan-26	Feb-26	FY26 Q3
Forecasted	134,936,006.47	137,121,863.33	135,705,694.22	407,763,564.01
Actual	136,123,998.05	124,879,779.27	146,095,716.02	407,099,493.34
Variance ($)	$1,187,991.58	$(12,242,084.05)	$10,390,021.80	$(664,070.67)
Variance (%)	1%	-9%	8%	0%

Figure 1.11-2. Purchased Power Costs under PPCA



	Dec-25	Jan-26	Feb-26	FY26 Q3
Forecasted	$58,524,505.30	$56,540,112.83	$55,751,393.90	$170,816,012.03
Actual	$56,584,660.20	$59,914,105.80	$46,039,133.42	$162,537,899.42
Variance ($)	$(1,939,845.10)	$3,373,992.97	$(9,712,260.48)	$(8,278,112.62)
Variance (%)	-3%	6%	-17%	-5%

c. No, LUMA does not prepare reporting regarding the economic impact of specific forced outage events. LUMA does prepare a monthly report titled *Fuel & Purchased Power Drivers Report* that analyzes the variance in generation plant performance from Fuel Charge Adjustment (FCA) forecasted values and their impact on Fuel and Purchased Power expenditures on a monthly basis. However, this analysis does not isolate the economic impact of specific forced outage events and instead analyzes the economic impact of total monthly variance from the FCA forecasted values which is caused by all types of operational and performance characteristics that stray from forecasted assumptions. This is performed to cover all operational differences from forecasts that affect the reconciliation process and contributes to the determination of the FCA and Purchased Power Charge Adjustment (PPCA) riders during the reconciliation process.

d. The answer to part c was no.

e. Yes.

f. Please refer to the response to part b for the cause of each outage event.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.12

SUBJECT

Unplanned or Forced Outages

REQUEST

1.12. During March 2026, have there been any unplanned or forced outages? If yes, identify each forced/unplanned outage by generating unit, date, time and duration.

a. Are the March 2026 forced/unplanned outages expected to extend beyond March 31, 2026 and into April 2026 or beyond? If so, explain fully.

b. If the answer to part a is “yes” how did LUMA and Genera consider the continuing generating unit outages in projecting fuel and purchased power cost for April through June 2026?

RESPONSE

a. No, there have been no forced outages in March 2026 that are expected to extend into April 2026 and beyond.

b. The answer to part (a) is no.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.13

SUBJECT

Economic Dispatch

REQUEST

1.13. From December 2025 to January 2026 and February 2026 were any generating units run for system reliability reasons and/or because of system constraints outside of normal economic dispatch in which the lowest variable cost units are called upon first to meet load? If so, identify the days and hours in which non-economic dispatch occurred and explain the related reasons.

RESPONSE

Please see the table below summarizing the instances in December 2025, January 2026, and February 2026 where generating units were dispatched outside normal economic order. The table identifies the specific days and hours of non-economic dispatch and provides the corresponding reasons.

Table 1.13-2. Instances of Non-Economic Dispatch

Instances of Non-Economic Dispatch
Aguirre CC GAS 2-4 was synchronized from 12:45 h 02/06/2026 to 01:24 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 12 h 39 minutes.
Aguirre CC GAS 1-1 was synchronized from 12:49 h on 02/06/2026 to 0:36 h on 02/08/2026 to lower the transfer on Line-50300. Time online: 35 h 47 minutes.
San Juan TM 10 was synchronized from 13:03 h on 02/06/2026 to 00:19 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 11 h 16 minutes.
San Juan TM 3 was synchronized from 13:23 h on 02/06/2026 to 10:36 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 21 h 13 minutes.
San Juan TM 4 was synchronized from 13:28 h on 02/06/2026 to 11:00 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 21 h 32 minutes.
San Juan TM 6 was synchronized from 14:03 h on 02/06/2026 to 10:32 h on 02/08/2026 to lower the transfer on Line-50300. Time online: 44 h 29 minutes.
Aguirre CC GAS 1-2 was synchronized from 14:20 h on 02/06/2026 to 01:00 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 10 h 40 minutes.
San Juan TM 5 was synchronized from 14:40 h on 02/06/2026 to 00:32 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 9 h 52 minutes.
Palo Seco TM 2 was synchronized from 14:58 h on 02/06/2026 to 01:54 h on 02/08/2026 to support the reduction of transfer on Line-50300. Time online: 34 h 56 minutes.

Permanent Rate

Aguirre CC GAS 2-2 was synchronized from 15:06 h on 02/06/2026 to 08:57 h on 02/07/2026 to lower the transfer on Line-50300. Time online: 17 h 51 minutes.
Palo Seco 1-2 was synchronized from 15:09 h to 23:40 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 8 h 31 minutes.
Palo Seco MP 1 was synchronized from 16:32 h to 23:13 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 6 h 41 minutes.
Palo Seco MP 3 was synchronized from 15:46 h to 23:19 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 7 h 33 minutes.
Mayagüez 3 was synchronized from 15:36 h to 23:38 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 8 h 02 minutes.
Mayagüez 4 was synchronized from 15:35 h to 23:49 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 8 h 14 minutes.
Cambalache 2 was synchronized from 16:01 h to 22:28 h on 02/06/2026 to reduce generation at the EcoEléctrica node. Time online: 6 h 27 minutes
San Juan TM 2 was synchronized from 21:39 h on 02/06/2026 to 10:30 h on 02/06/26 to reduce load on Line-50300 after LNG supply was restored. Time online: 12 h 51 minutes.
San Juan TM 5 was synchronized from 06:50 h to 11:08 h on 02/06/2026 to lower the transfer on Line-50300. Time online: 4 h 18 minutes.
San Juan TM 7 was synchronized from 09:03 h on 02/07/2026 to 10:39 h on 02/08/2026 to lower the transfer on Line-50300. Time online: 25 h 36 minutes.
San Juan TM 10 was synchronized from 09:25 h on 02/07/2026 to 10:46 h on 02/08/2026 to lower the transfer on Line-50300. Time online: 25 h 21 minutes.
Palo Seco TM 2 was synchronized from 07:23 h to 21:44 h on 10/02/2026 due to Line-51200 operating at 53% and Line-50300 at 41%, due to Via Libre on Line-50200. Time online: 14 h 21 minutes.
San Juan TM 5 was synchronized from 07:40 h to 12:54 h on 02/10/2026 due to Line-51200 operating at 53% and Line-50300 at 41%, due to Via Libre on Line-50200. Time online: 5 h 14 minutes.
San Juan TM 3 was synchronized from 08:43 h to 16:28 h on 02/10/2026 due to Line-51200 operating at 53% and Line-50300 at 41%, due to Via Libre on Line-50200. Time online: 7 h 45 minutes.
San Juan TM 7 was synchronized from 08:49 h to 13:18 h on 02/10/2026 due to Line-51200 operating at 53% and Line-50300 at 41%, due to Via Libre on Line-50200. Time online: 4 h 29 minutes.
San Juan TM 10 was synchronized from 08:31 h to 13:22 h on 02/10/2026 due to Line-51200 operating at 53% and Line-50300 at 41%, due to Via Libre on Line-50200. Time online: 4 h 51 minutes.
Aguirre CC GAS 2-1 was synchronized from 14:49 h to 20:30 h on 02/10/2026 to lower the transfer on Lines 51200, Line 50300 and Line 50200. Time online: 5 h 41 minutes.
Aguirre CC GAS 2-2 was synchronized from 14:36 h to 20:36 h on 02/10/2026 to lower the transfer on Lines 51200, Line 50300 and Line 50200. Time online: 6 h 00 minutes.
Aguirre CC GAS 1-1 was synchronized from 16:34 h to 19:33 h on 02/10/2026 to lower the transfer Lines 51200, Line 50300 and Line 50200. Time online: 2 h 59 minutes
Aguirre CC GAS 2-4 was synchronized from 16:35 h to 19:41 h on 02/10/2026 to lower the transfer Lines 51200, Line 50300 and Line 50200. Time online: 3 h 06 minutes
EcoElectrica Complex was being dispatched from 17:00 h on 02/27/2026 to 18:10 h on 03/01/2026 around 290 MW due to delay on Naturgy LNG ship. Time with fuel deficiency: 73 h 10 minutes.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.14

SUBJECT

System Demand

REQUEST

1.14. From December 2025 to January 2026 and February 2026 were there any hours in which sufficient generating and purchased power resources were not available to meet system demand for electricity? If so, identify the days and hours in which the available generating and purchased power resources were insufficient to supply the system demand for electricity and explain the related reasons sufficient resources were not available during those hours.

RESPONSE

There were no hours in which sufficient generating and purchased power resources were not available to meet system demand for electricity from December 2025 to February 2026.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.15

SUBJECT

Economic Dispatch

REQUEST

1.15. From December 2025 to January 2026 and February 2026 were there any days in which the most economical fuel source (e.g. LNG) was not available in sufficient quantities to enable full economic generation at any generating units? If so, identify the days during which the most economical fuel source was not available, and a higher cost fuel was used for generation. Also, explain the related reasons the most economic fuel source was not available to those generating units during those days.

RESPONSE

Liquefied Natural Gas (LNG) & Coal were the most economical fuel source during these months. There was no problem with coal. But on February 26, 2026 Costa Sur 6 was operating in 100% Bunker C fuel and Costa Sur 5 was operating in 80% LNG and 20% Bunker C fuel due to a two day delay from the LNG vessel. LNG then arrived on February 28 and both units were updated to 100% LNG.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.16

SUBJECT

Economic Dispatch

REQUEST

1.16. From December 2025 to January 2026, February 2026, and March 2026, were any new fuel supply contracts entered into for supply of natural gas or other fuel types? If yes, provide the following information:

a. A copy of the contract, including the pricing, quantities and delivery terms.

b. The names and job titles of the persons who negotiated the contract.

c. Whether the persons identified in response to part b are employed by affiliated entities or related parties, and, if so, an explanation of the affiliated relationship.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.17

SUBJECT

Ecoeléctrica

REQUEST

1.17. For December 2025, January 2026, and February 2026, were there any constraints on the power being supplied to the system by EcoEléctrica? Did the power supplied by Ecoeléctrica deviate from the projections? If so, please identify, quantify and explain those constraints and deviations.

RESPONSE

Yes, constraints to the power supplied by EcoEléctrica to the electrical system between December 2025 and February 2026 include hourly limitations for frequency regulation as needed as well as outages that occured during the three month period. Details of the forced outage events that took place at EcoEléctrica are described in further detail in request 1.18.

Below is a table of the monthly difference between forecasted and actual generation values at EcoEléctrica , along with the reasonings for deviation from the forecasted values.

Table 1.17-3. Monthly Difference – Forecast & Actual Generation

Month	Forecasted Generation (MWh)	Actual Generation (MWh)	Generation Difference (MWh)	Explanation
December 2025	266,489.06	283,216.60	+16,727.54	Greater capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation and a lower than forecasted heat rate
January 2026	262,379.19	277,045.70	+14,666.51	Greater capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation and a lower than forecasted heat rate
February 2026	247,262.80	255,633.65	+8,370.85	Greater capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation and a lower than forecasted heat rate

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.18

SUBJECT

Ecoeléctrica

REQUEST

1.18. For December 2025, January 2026, and February 2026, were there any days or hours in which power to the system could not be supplied Ecoeléctrica? If so, please identify those days and hours and explain what prevented the EcoEléctrica power from being supplied.

RESPONSE

For this response, please see the table below, which outlines any days or hours in December 2025, January 2026, and February 2026 in which EcoEléctrica's power could not be supplied, along with the corresponding explanations.

Table 1.18-4. Power Generation Failures at EcoEléctrica

Power Generation Failures at EcoElectrica				
Units	**Start Date**	**End Date**	**Duration**	**Cause**
Eco Electrica CT 1	2/12/25 8:49 AM	2/12/25 10:28 AM	1 hour & 39 min	CT 1 experienced a forced outage 2/12/25 at 08:49 h due to malfunction during the weekly DC lubrication pump test. A lube oil pressure switch malfunctioned, indicating a false low pressure reading. The faulty pressure switch was left in bypass mode and will be replaced.
Eco Electrica CT 1	3/12/25 12:57 PM	3/12/25 3:07 PM	2 hour & 10 min	CT 1 experienced a forced outage 3/12/25 at 12:57:52 h due to human error.
EcoElectrica Complex	27/2/2026 5:00 PM	1/3/2026 6:10 PM	50 hour & 10 min	EcoElectrica Complex was being dispatched around 290 MW due to delay on Naturgy LNG ship.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.19

SUBJECT

ASAP Program Costs

REQUEST

1.19 Refer to the public version of 20260316 MI20200001 Exhibit 1_ASAP Redacted, which is LUMA's Exhibit 1 relating to LUMA's Accelerated Storage Addition Program ("ASAP") costs. Refer to Table 0-2, reproduced below for ease of reference:

Table 0-2. ASAP Forecast Program Implementation Costs

Forecast Cost per Month	Legal	Consultant[17]	Total
March	*This month will be reconciled in the next Quarterly Report*		
April	$100,000	$300,000	$400,000
May	$100,000	$300,000	$400,000
June	$100,000	$200,000	$300,000

a. Show how LUMA derived its projected legal costs of $100,000 per month for each month, April through June 2026.

b. Please confirm that for the period January 2025 through February 2026, LUMA has never had monthly invoiced legal costs of $100,000 or more for the ASAP program. If this cannot be confirmed, explain why not and identify any months in the period January 2025 through February 2026 in which LUMA had invoiced legal costs for ASAP of $100,000 or more.

c. Please confirm that LUMA's monthly invoiced legal costs for ASAP were below $100,000 in each month in the period January 2025 through February 2026.

d. What were LUMA's average monthly invoiced legal costs for ASAP in the 14 month period from January 2025 through February 2026?

Footnote 17 to LUMA's Table 0-2 states as follows:

[17] This column includes the line items "Consultant", "Other" and "Contingency" in Table 3 of the Exhibit 3 submitted with LUMA's *Motion to Submit ASAP Program Implementation Plan and Associated Documents, Request for Approval of ASAP Cost Recovery Mechanism, and Request for Confidential Treatment*, Docket No. NEPR-MI-2024-0002, filed with the Energy Bureau on February 28, 2025.

e. Please provide a breakout of the LUMA proposed ASAP “Consultant” amounts for the three months showing the amounts in each category: (1) Consultant, (2) Other and (3) Contingency.

f. Please explain any amounts budgeted by LUMA for these months in the Other and Contingency categories.

RESPONSE

LUMA has requested the Energy Bureau an extension of time to submit a response to this request.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.20

SUBJECT

Restricted Reserve Account

REQUEST

1.20. Does LUMA maintain a restricted reserve account for funds transferred from PREPA to LUMA? If yes, please respond to the following:

a. What was the balance in that restricted reserve account as of February 28, 2026?

b. What is LUMA's expected balance in that restricted reserve account for March 31, 2026?

c. To compute the proposed FCA and PPCA factors for April through June 2026, how has LUMA reflected the use and application of funds from that restricted reserve account? Explain and identify amounts from the restricted reserve account that are projected to be applied in each month, April through June 2026.

RESPONSE

Under the Transmission and Distribution System Operation and Maintenance Agreement (T&D OMA)[3], LUMA is tasked with delivering Operation and Maintenance Services (O&M Services) of the T&D System, including fullfiling its System Operator duties. Importantly, the agreement assigns the responsibility for directly funding LUMA's operations to the Puerto Rico Electric Power Authority (PREPA), not LUMA.

To facilitate this, the T&D OMA establishes several Service Accounts that PREPA must fund by the 10th business day of each month, follwoing specific rules. Among these are the Fuel Service Account and the Purchase Power Service Account, which are designated exclusively for their respective purposes.

It is essential to note that LUMA's ability to carry out its operational and system operator responsibilities hinges on receiving these funds from PREPA. The T&D OMA makes clear that the Service Account funding process is separate from LUMA's billing and collections activities. LUMA deposits all customer payments daily into PREPA's account and does not use these payments to fund its operations or cover fuel and purchase power expenses; instead, LUMA must request funding from PREPA according to the

[3] The Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement executed on June 22, 2020, by and amongst the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A") and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, "LUMA").

established process. The T&D OMA does not specify how PREPA sources these funds, only that PREPA is obligated to provide them.

a. As of February 28, 2026, the LUMA Fuel Service Account held $911,000 and the Purchase Power Service Account had a balance of $59.325 million.

b. Looking ahead, the anticipated balances for March 31, 2026, are $0 for the Fuel Service Account and $49.190 million for the Purchase Power Service Account.

c. Additionally, the methodology for determining the proposed Fuel Charge Adjustment (FCA) and Purchased Power Charge Adjustment (PPCA) factors did not factor in the use of any restricted reserve account funds, so no amounts from that account are projected to be applied.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.21

SUBJECT

Customer Battery Energy Sharing (CBES)

REQUEST

1.21. As of February 28, 2026 what amount of cumulative differences between (1) actual and (2) forecast amounts for Customer Battery Energy Sharing (CBES and CBES+) does LUMA show?

RESPONSE

As of February 28, 2026, the cumulative difference between actual and forecast amounts for the Customer Battery Energy Sharing (CBES and CBES+) Programs is $6,932,754.02, as reflected in Table below.

FY2026			
Months	**Actual**	**Forecast**	**Variance**
Jul-25	557,863.60	5,084,342.00	4,526,478.40
Aug-25	1,541,952.00	3,132,199.99	1,590,247.99
Sep-25	4,896,169.91	1,903,159.24	(2,993,010.67)
Q1 Total	**6,995,985.51**	**10,119,701.23**	**3,123,715.72**
Oct-25	886,965.00	4,570,542.03	3,683,577.03
Nov-25	1,324,429.00	1,540,067.20	215,638.20
Dec-25	492,336.88	294,114.95	(198,221.93)
Q2 Total	**2,703,730.88**	**6,404,724.18**	**3,700,993.30**
Jan-26	(53,694.00)	40,000.00	93,694.00
Feb-26	25,649.00	40,000.00	14,351.00
FY 2026 Total	**9,671,671.39**	**16,604,425.41**	**6,932,754.02**

This amount represents the net variance between actual program costs incurred and forecasted amounts included in the Purchased Power Charge Adjustment (PPCA). Consistent with the applicable regulatory framework, such variances are subject to reconciliation and are returned to or recovered from customers through the applicable reconciliation process.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.22

SUBJECT

Accelerated Storage Addittion Program (ASAP)

REQUEST

1.22. For the Accelerated Storage Addition Program (ASAP), what is the cumulative difference for the ASAP (1) invoiced actual amounts and (2) LUMA's forecasted ASAP amounts through February 28, 2026?

RESPONSE

As of February 28, 2026, the cumulative difference between actual and forecast amounts for the Accelerated Storage Addition Program (ASAP) Programs is $2,652,267.95, as reflected in Table below.

Month	Forecasted Costs	Invoiced Actuals	Amount to be charged or reimbursed to customers
Dec-24	1,171,000.00	1,225,285.00	(54,285.00)
Jan-25	190,000.00	143,742.50	46,257.50
Feb-25	200,000.00	191,333.75	8,666.25
Mar-25	700,000.00	73,471.00	626,529.00
Apr-25	700,000.00	336,695.00	363,305.00
May-25	639,000.00	-	639,000.00
Jun-25	550,000.00	446,122.00	103,878.00
Jul-25	600,000.00	267,177.00	332,823.00
Aug-25	600,000.00	423,195.00	176,805.00
Sep-25	600,000.00	313,783.40	286,216.60
Oct-25	600,000.00	465,347.00	134,653.00
Nov-25	550,000.00	363,465.00	186,535.00
Dec-25	550,000.00	394,314.89	155,685.11
Jan-26	-	215,391.50	(215,391.50)
Feb-26	-	138,409.01	(138,409.01)
Total	**$7,650,000.00**	**$4,997,732.05**	**2,652,267.95**

Permanent Rate

This amount represents the net variance between actual program costs incurred and forecasted amounts included in the Purchased Power Charge Adjustment (PPCA). Consistent with the applicable regulatory framework, such variances are subject to reconciliation and are returned to or recovered from customers through the applicable reconciliation process.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.23

SUBJECT

Fuel Deliveries

REQUEST

1.23. From December 2025 to January 2026, and February 2026, were any incoming fuel deliveries diverted to another delivery location (e.g., because of delivery site conditions, weather, or other causes)? If so, please identify with specificity which fuel deliveries were diverted and include a short explanation of why the delivery diversion occurred and whether it impacted plant operations and generation availability.

RESPONSE

Genera to respond to this Response for Information (RFI). LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260318-PREB-LUMA-1.24

SUBJECT

Natural Gas Shortfall

REQUEST

1.24. During December 2025, January 2026, and February 2026 were there any shortfalls in nominated/contracted natural gas deliveries? If so, what was the dollar impact on fuel cost in each month, December 2025, January 2026, and February 2026 due to the reduced natural gas deliveries, such as but not limited to creating a need for increased reliance on diesel-fueled related peaking units to compensate for the lack of natural gas fueled generation? Explain fully and provide all related analysis and calculations of the related fuel cost impacts for each month.

RESPONSE

LUMA has requested the Energy Bureau an extension of time to submit a response to this request.