

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

**NEPR**

**Received:**

**May 20, 2026**

**10:19 AM**

**IN RE:**

MANEJO DEL MANTENIMIENTO Y REPARACIONES DE LAS UNIDADES DE GENERACIÓN UTILIZADAS POR LA AUTORIDAD DE ENERGÍA ELÉCTRICA DE PUERTO RICO PARA SUPLIR SERVICIO ELÉCTRICO

**CASE NO.:** NEPR-MI-2021-0014

**SUBJECT:** Motion to Submit Revised Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for the Third Quarter of Fiscal Year 2026

**MOTION TO SUBMIT REVISED QUARTERLY REPORT ON CONSUMABLES,  
SPARE PARTS, AND CAPITAL SPARE PARTS FOR THE THIRD QUARTER OF  
FISCAL YEAR 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 counsels of record, and respectfully submits and prays as follows:

1. On February 26<sup>th</sup>, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA’s Proposed Consumables, Spare Parts, and Capital Spare Parts Listing* (“February 26<sup>th</sup> Resolution”), where it approved the final version of the revised assessment of Consumables, Spare Parts, and Capital Spare Parts subject to the Quarterly Reporting Requirements established in Attachment A of said Resolution and Order, and ordered Genera to file the foregoing Quarterly Reports within 45 days after the end of each quarter.

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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, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (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.

2. In compliance with the February 26th Resolution, on May 15, 2026, Genera filed its Motion to Submit Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for the Third Quarter of Fiscal Year 2026, attaching as Exhibit A thereto the Third Quarter (“Q3”) Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026.

3. Notwithstanding the above, Genera informs this Honorable Energy Bureau that, through inadvertent omission, it did not include the Q3 update corresponding to GPR-PREB-NEPRMI20210014-20240226 #4 in Exhibit A to the Motion filed on May 15, 2026.

4. Accordingly, and in compliance with the February 26<sup>th</sup> Resolution, Genera respectfully submits a revised version of the Third Quarter (“Q3”) Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026 as Exhibit A to this Motion.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the foregoing for all purposes; **accept** Genera’s Revised Q3 Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026 as Exhibit A hereto; and **deem** Genera to be in compliance with the February 26<sup>th</sup> Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20th day of May of 2026.

**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 the following counsel of record: [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov); [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [nzayas@gmlex.net](mailto:nzayas@gmlex.net); [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [katuska.bolanos-lugo@us.dlapiper.com](mailto:katuska.bolanos-lugo@us.dlapiper.com); [karenortiz@aes.com](mailto:karenortiz@aes.com); [elias.sostre@aes.com](mailto:elias.sostre@aes.com); [carlos.reyes@ecoelectrica.com](mailto:carlos.reyes@ecoelectrica.com).

*[Signature page follows]*

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**Exhibit A**

Revised Q3 Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026  
(Attachment to GPR-PREB-NEPRMI20210014-20240226 #4)

Docket Number: NEPR-MI-2021-0014

In Re: Determination on Genera's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing

RE: **FY26 – Q3 Report** – Maintenance and Repair Management of the Generation Units of the Puerto Rico Electric Power Authority

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## **Attachment A**

### **Planned Maintenance and Critical Component Replacement Program.**

#### **GPR-PREB-NEPRMI20210014-20240226 #1**

1. Report on Genera's progress in achieving the Expected Results of Forced Outage Reduction: 32% to 15% as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.

#### **Response:**

During Q1 of FY 2025–26, Palo Seco Unit 4 remained out of service until September 16. The unit was subsequently taken out of service again from September 17 through September 26 due to a generator rotor failure, during which repair activities were carried out. The unit returned to service on September 26.

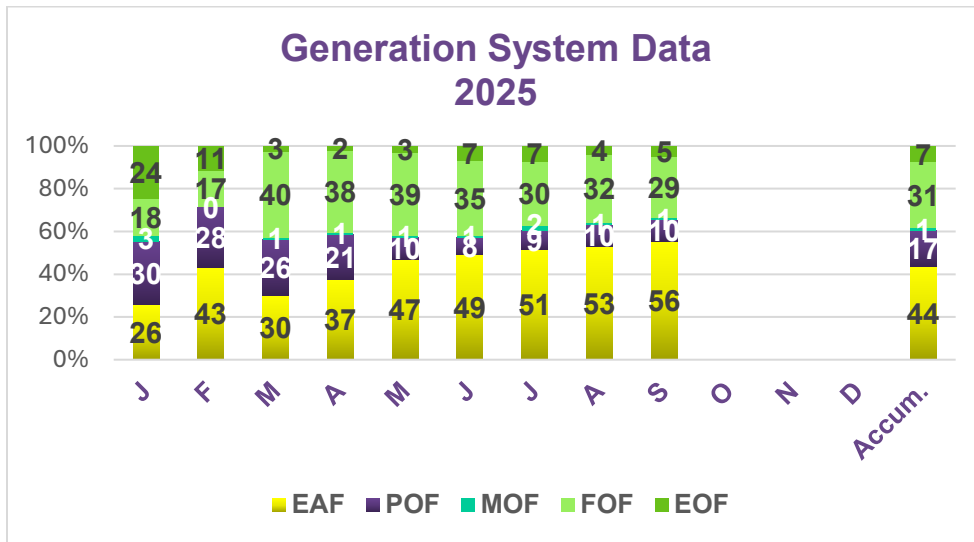
Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.

The Key improvements were the following:

- The Equivalent Availability Factor (EAF) increased from 49% in June 2025 to 56% in September 2025, contributing to a reduction in load-shedding during the period.
- The Forced Outage Factor (FOF) decreased from 35% in June 2025 to 29% in September 2025, resulting in improved unit availability.

- San Juan Unit 9 was out of service from July 22 through July 24 for a total of 67.6 hours due to maintenance activities, including steam leak repairs and condenser cleaning.
- San Juan CT 5 and San Juan ST 5 were out of service on July 14 for 17.6 hours and 19.1 hours, respectively, due to condenser cleaning to improve unit efficiency.
- San Juan CT 5 and San Juan ST 5 were again out of service from August 16–20 for 76.6 hours and 81.4 hours, respectively, for condenser cleaning to improve unit efficiency.
- San Juan CT 5 was out of service from September 5–7 for 47.5 hours due to condenser cleaning to improve unit efficiency.
- San Juan ST 5 was out of service from September 5–8 for 61.9 hours due to condenser cleaning to improve unit efficiency.
- Note: A project is currently underway during FY 2025–26 to implement a continuous condenser cleaning system, which will eliminate the need for offline condenser cleaning. This initiative will contribute to improved unit efficiency.
- San Juan CT 6 underwent various inspections during September, including work on bearing #1 associated with the transmission torque converter.
- San Juan CT 6 was also out of service from September 20–22 for 55.7 hours to conduct condenser testing, after which the required corrections were completed.

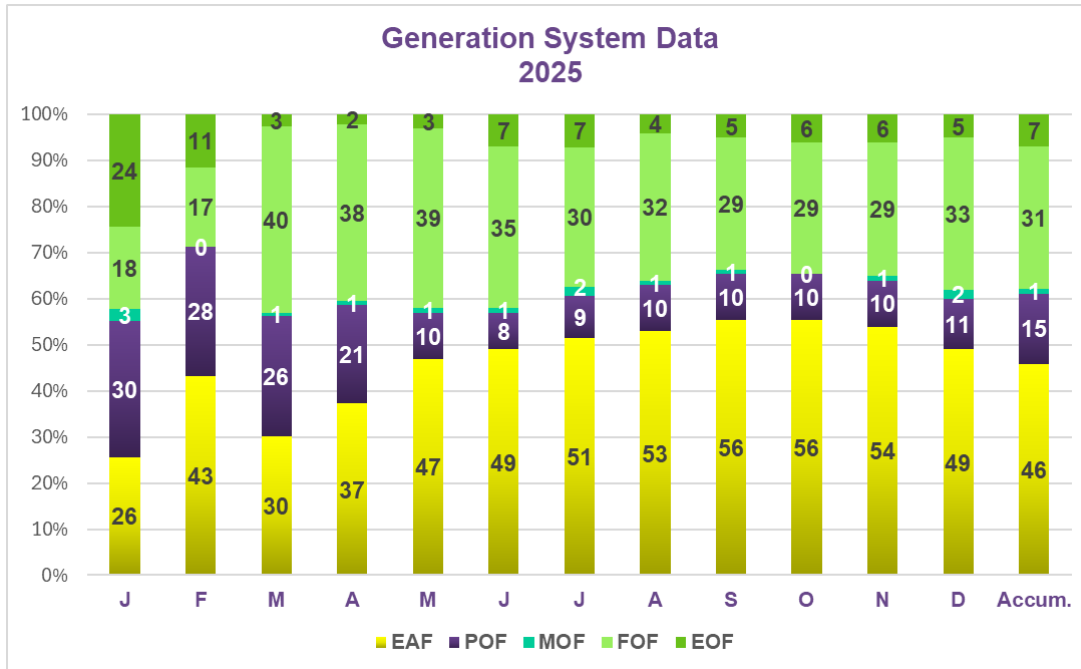
**Figure 1: Generation System Data for Q3, Q4 FY2024 & Q1 FY2025**



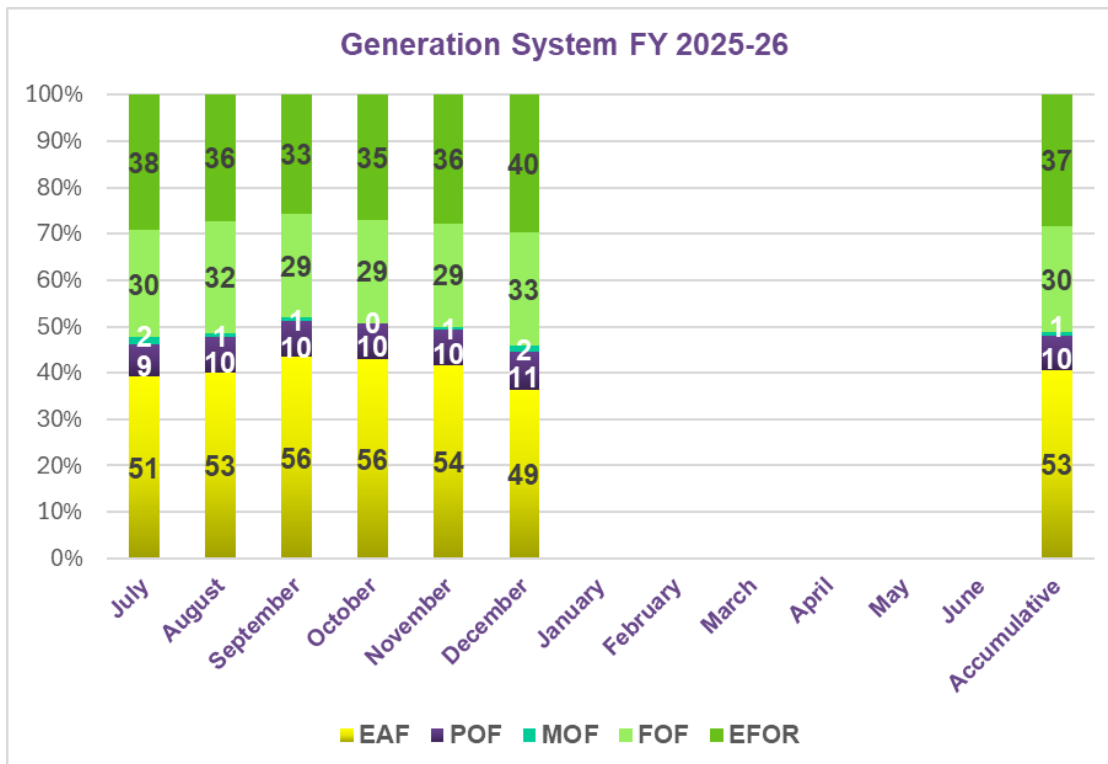
**Q2 Update:**

- Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.
- Aguirre Unit 2 had a forced outage for 172 hours in December due to a boiler tube failure.
- Cambalache Unit 3 remained out of service throughout the quarter due to a turbine failure.
- Due to a failure on the isolators in the metal clad cabinet near the San Juan TM 1 Unit, main power transformer breaker opened, causing a trip to the rest of the units.
- A combustion inspection was performed with the manufacturer on San Juan CT and ST 5 from November 19 to December 16 period. LUMA did not authorize the outage; therefore, it was documented as a forced outage. Work on ST 6 was performed by the manufacturer from December 16 to 23 during the forced outage period.

**Figure 2: Generation System Data of CY2025**

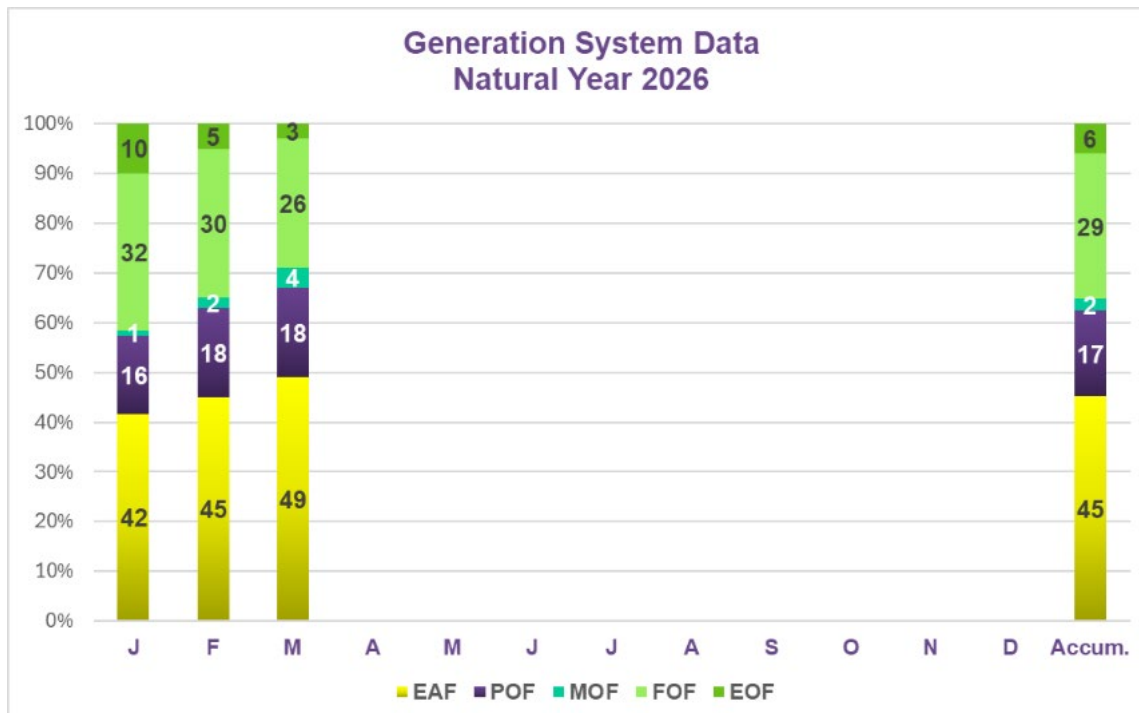


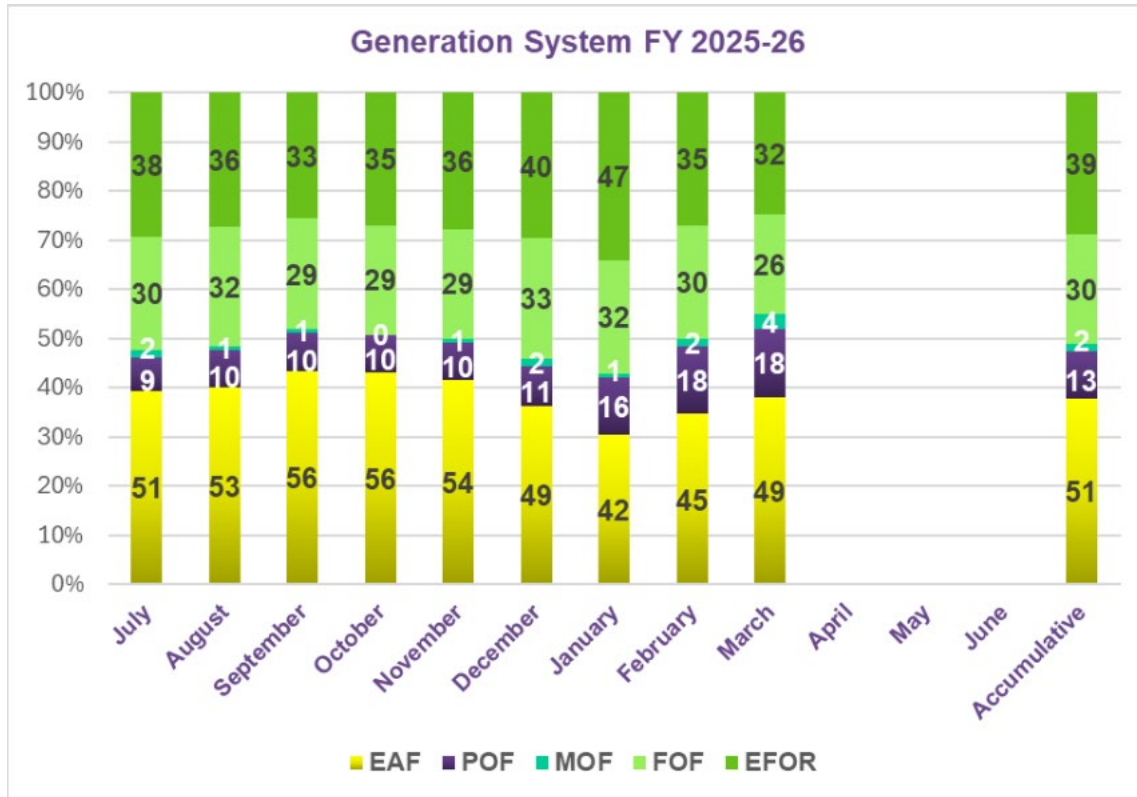
**Figure 3: Generation System Data for Q1 and Q2 of FY2025**



**Q3 Update:**

- Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.
- Aguirre Unit 2 had two forced outages for 196 hours in February due to boiler tube failures.
- Cambalache Unit 3 returned to service on March 10th after a major turbine repair. Due to this repair, the Forced Outage Factor % of Cambalache power plant was reduced from 49% to 24%.
- Costa Sur 5 had two forced outages in January for a total of 440 hours due to boiler failure and a feedwater system valve failure.
- Palo Seco steam plant had a forced outage factor below 5% during Q3. This was achieved due to improvements in reliability of Palo Seco 4 unit.





**GPR-PREB-NEPRMI20210014-20240226 #2**

2. Report on Genera's progress in achieving the Expected Results Increase in availability: 17% = 340 MW as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program.

**Response:**

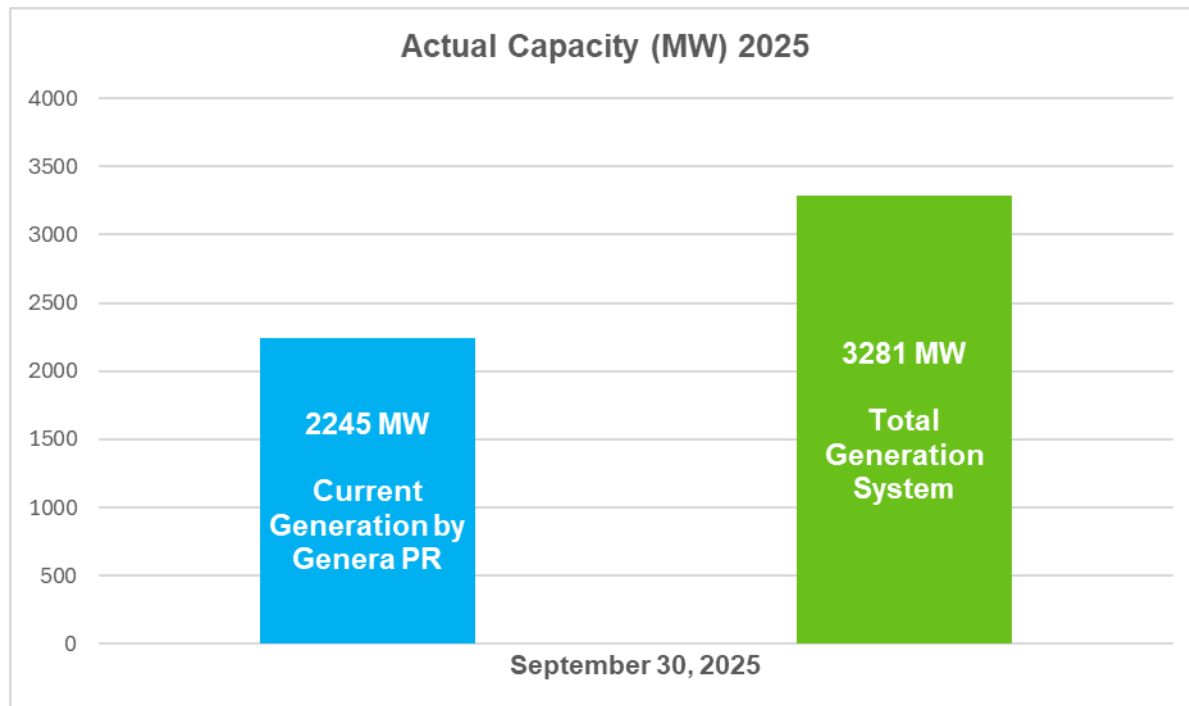
The EAF increased from 49% in June 2025 to 56% in September 2025, contributing to a reduction in load-shedding and improving overall unit availability.

As of September 30, 2025, the Total Generation System Availability was 3,281 MW, while the highest Peak Demand recorded during the quarter was 3,203 MW.

Generation limitations during the period were as follows:

- Costa Sur Unit 6 was limited by approximately 154 MW due to elevated differential pressure in the air heaters.
- Palo Seco Units 3 and 4 were limited to approximately 222 MW.
- San Juan TM Units 1, 8, and 10 were limited due to their operation on ULSD as a result of constraints in the LNG fuel supply (+15 MW).
- San Juan TM Unit 5 remained out of service as a spare unit due to LNG fuel supply issues (+25 MW).  
San Juan TM Unit 7 experienced a forced outage (+25 MW).  
Palo Seco TM Unit 3 was limited due to operation on ULSD resulting from LNG supply issues (+8 MW).

**Figure 4: Actual Capacity of Q1 FY2025**



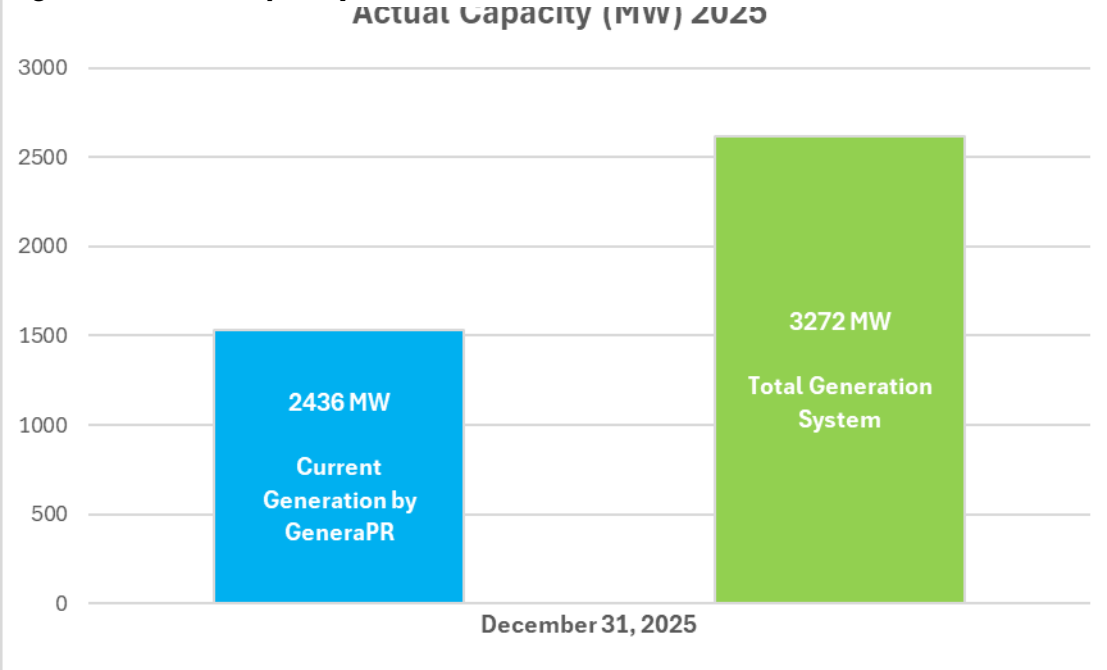
**Q2 Update:**

Genera has made progress toward achieving the Expected Results Increase in availability of 17% (340MW) as outlined in the Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. However, this progress was partially offset during the reporting period by an increase in both forced and planned outages across the fleet.

In particular, San Juan Unit 6 entered a planned outage beginning December 16, 2025, and San Juan Unit 7 remained on planned outage throughout the quarter. These planned outages, together with additional forced outage events experienced during the period, temporarily reduced the net available capacity and delayed the full realization of the targeted 340 MW increase.

Notwithstanding these temporary impacts, the planned maintenance and critical component replacement activities are necessary to restore unit reliability and are expected to contribute to sustained improvements in availability once the affected units return to service. Genera continues to implement the approved program to achieve the projected availability increase as units complete maintenance and return to commercial operation.

**Figure 5: Actual Capacity for Q1 and Q2 of FY2025**



**Q3 Update:**

The accumulative EAF decreased from 53% in Q2 to 51% in Q3.

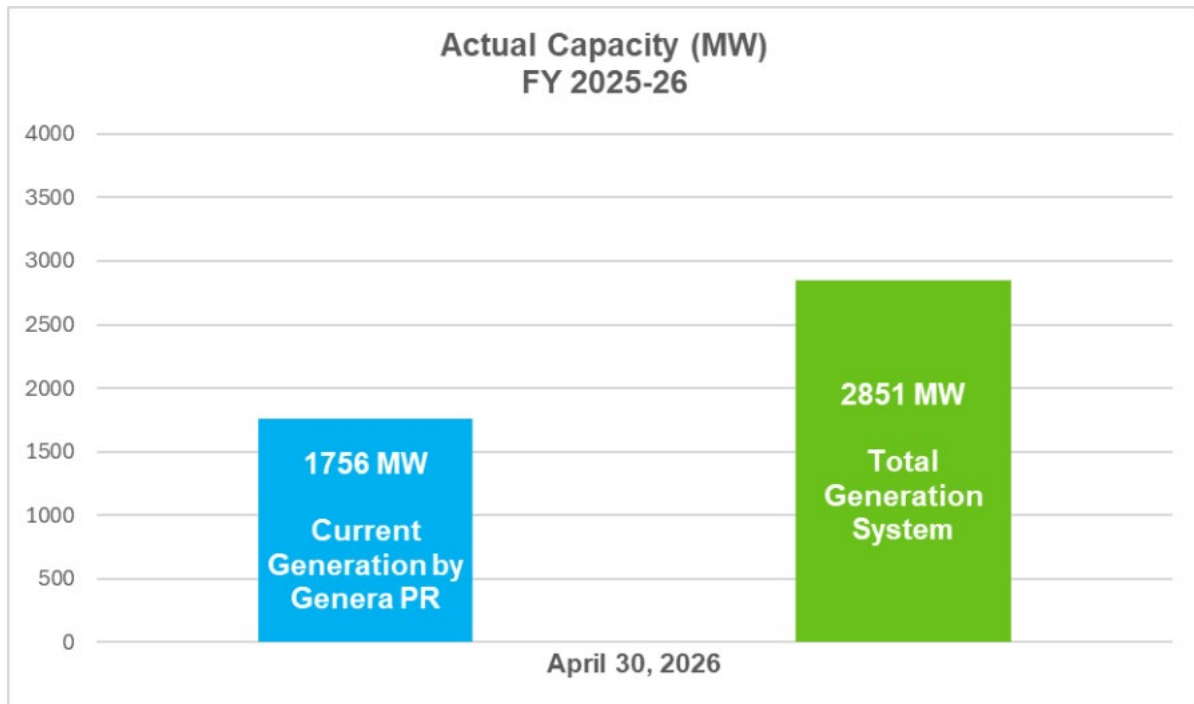
Q3 is a low demand season, therefore GeneraPR performs maintenance works in coordination with the electrical system's operator, LUMA Energy.

San Juan 6 was out of service during the entire Q3 due to a programmed outage for a turbine inspection in coordination with LUMA Energy and the unit manufacturer, Mitsubishi, under the applicable long-term service agreement.

San Juan 9 experienced maintenance outages during Q3, including 335 hours in January to repair of a boiler IDF fan and 223 hours in February for boiler repairs.

Palo Seco 3 was out of service since January 15 due to a programmed outage conducted in compliance with EPA environmental requirements.

Palo Seco 4 was out of service for 516 hours during March due to a maintenance outage to repair a hydrogen leak on the generator, in coordination LUMA Energy. This work was scheduled during Q3 due to the lower seasonal electricity demand.



**GPR-PREB-NEPRMI20210014-20240226 #3**

3. Report on Genera's success in accurately predicting and achieving scheduled Regular Maintenance Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

**Response:**

Key scheduled outages and delays during the first quarter include:

- Palo Seco Unit 4 had a forced outage on August 8, 2023. The unit returned to service on September 26, 2025, and is currently in the commissioning and testing phase.
- Aguirre Unit 2 experienced a forced outage in February 2025 and returned to service in July 2025. The outage included repairs to the excitation system and the installation of a new AVR system.
- The Palo Seco Unit 4 maintenance outage, originally scheduled for completion in July 2025, was extended through September 2025 due to additional findings identified during the generator installation.
- The Combined Cycle Steam Unit 1 maintenance outage, initially planned to conclude on June 30, 2025, has been extended to December 2025 as a result of additional findings related to the condenser circulating water pump and condenser system.

**Q2 Update:**

Key scheduled outages and delays during the second quarter include:

- The Palo Seco Unit 4 planned maintenance outage, originally scheduled for completion in July 2025, was extended through January 2026. Such extension was impacted due to other units' forced outages.
- The Combined Cycle Steam Unit 1 maintenance outage, initially planned to conclude on June 30, 2025, has been extended as a result of findings related to the condenser circulating water pump and condenser system.
- San Juan Unit 6 was on planned outage starting on December 16.

- San Juan Unit 7 was on planned outage during this quarter.

**Q3 Update:**

Key scheduled outages and delays during the third quarter include:

- As part of the scheduled Regular Maintenance Program, Palo Seco Unit 3 remained out of service beginning January 15 due to a programmed outage conducted in compliance with EPA environmental requirements. The unit's expected return-to-service date is May 2026.
- The planned maintenance outage for Palo Seco Unit 4 was officially completed.
- The maintenance outage for Combined Cycle Steam Unit 1, initially scheduled to conclude on June 30, 2025, was extended following findings related to the condenser circulating water pump and condenser system. Delays in the availability of spare parts also impacted the unit's return to service.
- San Juan Unit 6 remained on a planned outage throughout the entirety of Q3.
- San Juan Unit 7 remained on a planned outage throughout the entirety of Q3. Additional damage to the turbine rotor blades was identified due to extended operational hours.
- The major turbine repair for Cambalache Unit 3 was officially completed on March 10, 2026.

**GPR-PREB-NEPRMI20210014-20240226 #4**

1. Report on Genera's success in accurately predicting and achieving scheduled Critical Component Replacement Program timeframes and durations as stated in the document titled, Generation Fleet Outage Schedule Planned Maintenance and Critical Component Replacement Program. Specify the reasons causing any deviation to the established Planned Maintenance and Critical Component Replacement Program schedule.

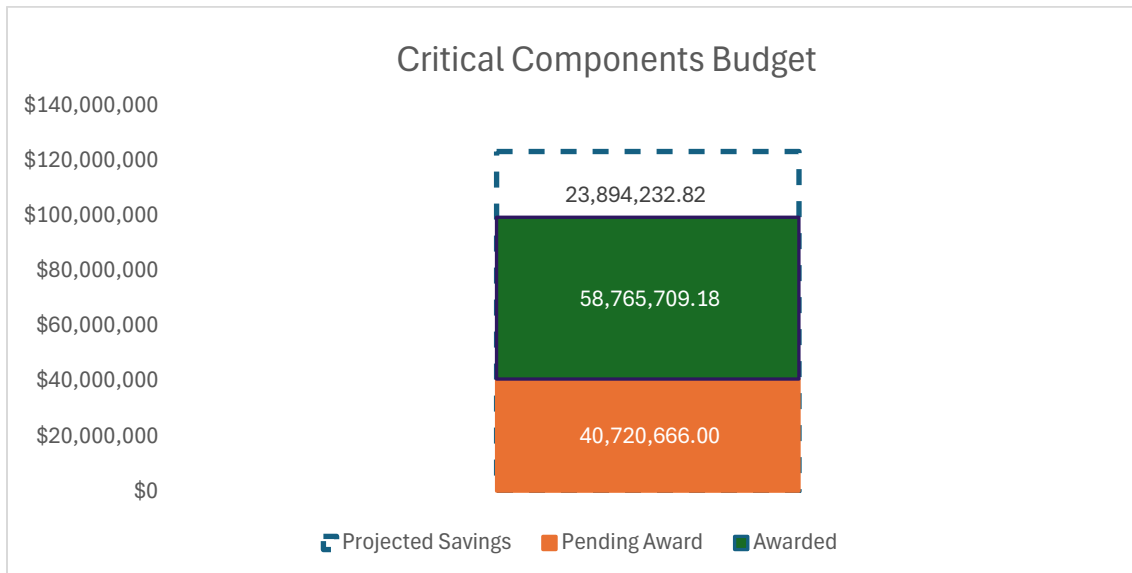
**Response:**

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226 #4.

**Q2 Update:**

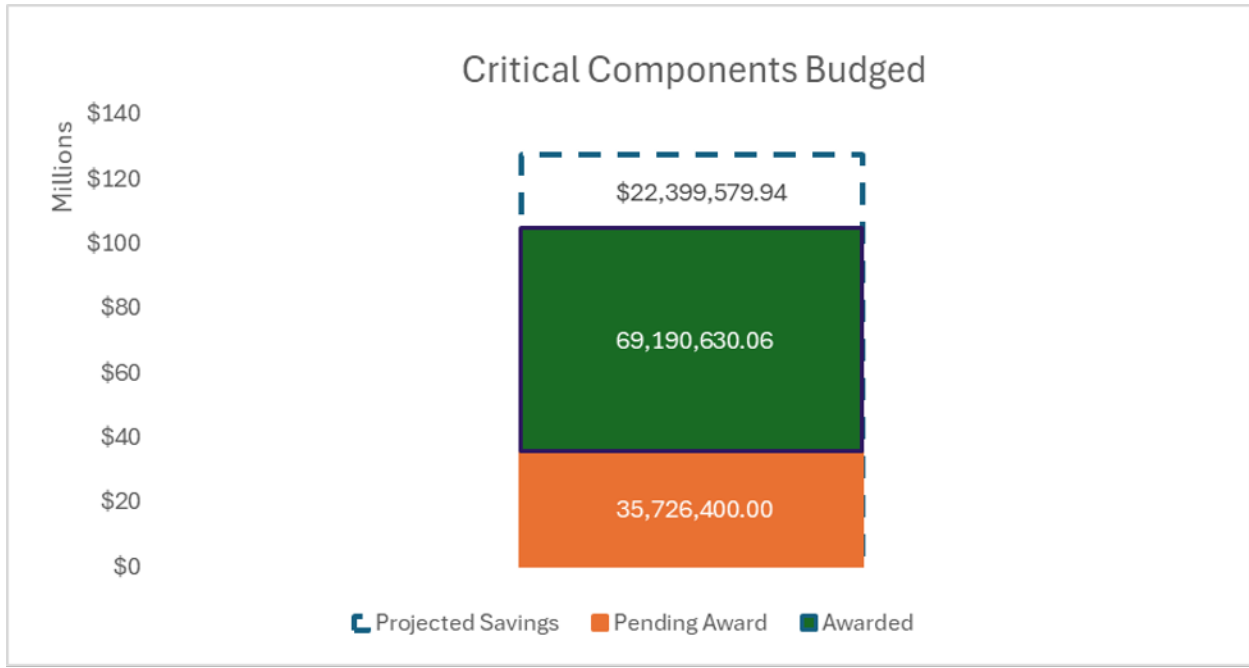
As shown in Figure 6 and detailed in Attachment GPR-PREB-NEPRMI20210014-20240226 #4, the total Critical Components Budget is approximately \$123.38 million. Of this amount, \$58,765,709.18 has been awarded, \$40,720,666.00 remains pending award, and projected savings total \$23,894,232.82.

**Figure 6: Critical Components Budget**



**Q3 Update:**

As shown in the figure below, the total critical components budget is approximately \$127 million. Of this amount, \$69,190,630.06 has been awarded, \$35,726,400.00 remains pending award, and projected savings total \$22,399,579.94.



**GPR-PREB-NEPRMI20210014-20240226 #5**

2. Report on incidents of unplanned outages in Genera's Generation Fleet, including reason for outage, duration of outage, generation plant unit experiencing the outage, and how the duration of the outage was affected by availability or unavailability of Consumables, Spare Parts, and Capital Spare Parts.

**Response:**

See attachments:

- GPR-PREB-NEPRMI20210014-20240226 #5 - July
- GPR-PREB-NEPRMI20210014-20240226 #5 - August
- GPR-PREB-NEPRMI20210014-20240226 #5 - September

**Q2 Update:**

See attachments:

- GPR-PREB-NEPRMI20210014-20240226 #5 - October
- GPR-PREB-NEPRMI20210014-20240226 #5 - November
- GPR-PREB-NEPRMI20210014-20240226 #5 - December

**Q3 Update:**

Please see attachment GPR-PREB-NEPRMI20210014-20240226 #5.

## **II. Consumables Spare Parts and Capital Spare Parts Inventory**

### **C1. Genera Supply Chain**

#### **GPR-PREB-NEPRMI20210014-20240226 #C1**

Detail and quantify the results of Genera's Supply Chain strategy used to achieve priority changes and improve warehouse operations and control of spare parts, consumables, and equipment inventory, reflecting Prudent Utility Practice, using the "lean" and "agile" systems identified in Genera's July 26 Motion, Appendix A.

#### **Response:**

Genera continued implementing its lean and agile supply chain strategy during the semester to strengthen warehouse operations and improve control of spare parts, consumables, and equipment inventory. The Warehouse Department maintained its practice of issuing monthly reports documenting end-of-month inventory levels, warehouse transactions, material movement, and activities related to proper storage, efficient handling, inventory controls, and waste reduction.

To further support this strategy, the IT Department is developing new Power BI dashboards to customize the Asset Suite platform for Genera's operational needs. These enhancements will improve visibility, reporting accuracy, and overall efficiency in warehouse and inventory management.

#### **Q2 Update:**

Power BI reports are being tested by the IT Department to validate data accuracy and improve process efficiency. IT is also reviewing the dashboards to confirm that inventory models align with real world inventories levels.

#### **Q3 Update:**

Power BI platform is operational and working in real time. Reports are available to all customers to use for their daily operations. Dash boards are user friendly and reports are divide into sections for all department to use.

## **C2. Reliability Centered Management Program**

### **GPR-PREB-NEPRMI20210014-20240226 #C2**

Detail the status of the development and implementation of Genera's Reliability Centered Management Program and Genera's success in accurate scheduling and tracking programs to manage inventory for the three identified major elements of Preventive Maintenance, Predictive Maintenance, and Corrective Maintenance.

#### **Response:**

Genera continued advancing its Reliability Centered Management Program during the semester, focusing on the three major elements of preventive, predictive, and corrective maintenance. All maintenance activities are being scheduled and tracked through the Asset Suite Enterprise Asset Management system, consistent with the Plant Maintenance Manual, vendor technical documentation, and sound engineering practices.

During the period, Genera continued updating the equipment hierarchy, refining the stock catalog based on the warehouse audit, and preparing the integration of Smart CBM technologies (vibration, infrared thermography, and ultrasound) to maintain accurate equipment history and improve reliability tracking. The Inventory Module (WMS) also continues to support control of spare parts, consumables, and equipment locations across all facilities.

In support of these efforts, the IT Department is developing new process systems and KPI tools within Asset Suite to enhance maintenance tracking, reliability reporting, and warehouse management functionality.

#### **Q2 Update:**

The IT Department continues to develop new process systems and KPI tools within Asset Suite to enhance maintenance tracking, reliability reporting, and warehouse management functionality.

#### **Q3 Update:**

The IT Department continues to develop new process systems and KPI tools within Asset Suite to enhance maintenance tracking, reliability reporting, and warehouse management functionality.

### **C3. Managing Obsolete Parts**

#### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(a)(i)**

3. Detail Genera's success in managing obsolete spare parts in the short, medium, and long term based on the following timeframe:

##### **a. 6 months**

i. Status of the detailed inventory audit.

#### **Response:**

All obsolete material and listing are located at Aguirre warehouse.

#### **Q2 Update:**

Obsolete materials from the four warehouses are being consolidated and relocated to a dedicated warehouse at the Aguirre Power Plant, pending PREB and P3A authorization for final disposition. This process includes the packing, identification, and labeling of all related containers and pallets.

#### **Q3 Update:**

The consolidation and relocation of obsolete materials to the dedicated warehouse at the Aguirre Power Plant was completed during Q3. Materials have been identified, categorized, and organized to support the final disposition process, pending the corresponding approvals from PREPA, PREB, and P3A.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(a)(ii)**

- ii. Status of the plan to eliminate redundancies, cancel standing orders, return, sell or write off obsolete spare parts and equipment.

**Response:**

Genera continued working with the Operations team to identify essential materials for the Legacy Generation Assets and to classify surplus obsolete spare parts for proper disposal. Because these assets are movable property owned by PREPA, Genera is developing a process consistent with applicable laws and regulations to govern their disposal and write-off.

To reduce redundancies, Warehouse is reviewing inventory movement history, adjusting stock levels, and canceling standing orders for items that do not require long lead times or are already available in inventory or under Master Purchase Agreements. Warehouse also continues to track procurement requests to promote alignment with actual inventory and reduce unnecessary purchases.

As part of its efforts to streamline processes and strengthen inventory controls, Genera implemented a requirement that all material requests, codified or not, must be processed through the Warehouse. This approach allows for better tracking, improved accountability, and reduced redundancies. Additionally, the IT Department is developing new reports within Asset Suite to further support these objectives and enhance visibility in material usage.

**Q2 Update:**

The IT Department is developing new reports within Asset Suite to further support these objectives and enhance visibility into material usage. Same as Quarter 1.

**Q3 Update:**

Power BI platform is operational and working in real time. Power BI provides all information and data related to operations and warehousing. All reports related to warehousing are formatted in charts, graphs and excel documents for easy application on daily operations.

**GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(i)****b. 12 – 24 months**

i. Division of warehouse inventory into the identified categories.

**Response:**

Genera continued advancing the division of warehouse inventory into the identified categories. The Warehouse Team is refining purchasing and storage practices by categorizing parts and equipment to strengthen proper organization and improve efficiency. To support this effort, the Asset Suite platform is being updated to incorporate all category classifications, providing greater visibility into material requests and purchase orders. Warehouse personnel are also organized by category to better understand operational needs, react to market conditions, and reduce unnecessary or emergency purchases.

As part of the ongoing improvements, Genera is reviewing its inventory category listings to reclassify materials with duplicated descriptions in the inventory management system. Additionally, obsolete materials from the four warehouses are being consolidated and relocated to a dedicated warehouse at the Aguirre Power Plant, pending PREB and P3A authorization for final disposition. This process includes the packing, identification, and labeling of all related containers and pallets.

**Q2 Update:**

Genera is reviewing its inventory category listings to reclassify materials with duplicated descriptions in the inventory management system. Additionally, obsolete materials from the four warehouses are being consolidated and relocated to a dedicated warehouse at the Aguirre Power Plant, pending PREB and P3A authorization for final disposition. This process includes the packing, identification, and labeling of all related containers and pallets.

**Q3 Update:**

Genera continued the review and reclassification of inventory category listings within the inventory management system to address duplicated material

descriptions and improve inventory accuracy. In parallel, obsolete materials consolidated from the four warehouses remain stored at the dedicated warehouse at the Aguirre Power Plant pending final disposition approvals from PREPA, PREB, and P3A. Materials have been properly identified, labeled, and organized to support the disposition process.

**GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(ii)**

- ii. Tracking and monitoring the proper demand forecasting tool for spare parts, equipment, and consumables.

**Response:**

Genera continued strengthening the tracking and monitoring of demand forecasting for spare parts, equipment, and consumables during the semester. Weekly coordination meetings between Warehouse, Operations plant managers, and Procurement support planning for scheduled outages and repairs, allowing the teams to prioritize orders, monitor inventory movement, and facilitate timely re-stocking of essential materials.

Efforts to enhance Asset Suite also continued, including the incorporation of item categories with minimum thresholds that trigger purchase flags. These improvements will support more accurate forecasting by providing clearer visibility into stock levels and material usage. In parallel, Genera and LUMA continue working on the segregation of Asset Suite data and servers, which will enable Genera to expand and improve reporting capabilities.

As part of these efforts, the IT Department is developing new Power BI reporting platforms, and daily monitoring of data continues through the front end of Asset Suite. These tools will further enhance demand forecasting, visibility of lead times and prices, and understanding of plant-specific needs.

**Q2 Update:**

The IT Department is developing and implementing new Power BI reporting platforms, and daily monitoring of data continues through the front end of Asset Suite. These tools will further enhance demand forecasting, visibility of lead times and prices, and understanding of plant specific needs.

**Q3 Update:**

Power BI reporting tools continue to support inventory forecasting and material identification for generation units, allowing materials to be procured in a timely manner to minimize the risk of maintenance delays, outages, or operational

disruptions. The system also enables warehouse supervisors to improve planning for future repairs by identifying required stock levels, evaluating system lead times, and coordinating procurement with reliable suppliers to ensure material availability.

**GPR – PREB – NEPRMI20210014 – 20240226 #C3(b)(iii)**

iii. Implementation of automatic requisitions when the minimum quantity is reached.

**Response:**

Genera continued advancing the steps required to implement automatic requisitions when minimum quantity thresholds are reached. As part of the transition away from the Shared Services Agreement, the segregation of the Asset Suite database and system administration functions will allow Genera to gain full control of the platform. This will enable the development of customized programming, enhanced system capabilities, and potential integration with other tools to automate requisitioning and reduce manual intervention once minimum stock levels are triggered.

During this quarter, Warehouse personnel focused on cleaning and correcting duplicated descriptions within the system and ensuring proper classification of categories. Once these corrections are completed, Genera will proceed with reprogramming the automated requisition functionalities to support accurate, system-driven replenishment.

**Q2 Update:**

During this Quarter, Warehouse personnel focused on updating and correcting duplicated descriptions within the system and ensuring proper classification of categories. Once these corrections are completed, Genera will proceed with reprogramming the automated requisition functionalities to support accurate, system driven replenishment.

**Q3 Update:**

During this Quarter, Warehouse personnel focused on updating and correcting duplicated descriptions within the system and ensuring proper classification of categories. Warehouse supervisors are now creating new stock catalogs for the legacy units. Genera is updating items with new descriptions to ensure are within industry standards. Once these corrections are completed, Genera will

proceed with reprogramming the automated requisition functionalities to support accurate, system drive replenishment.

**GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C3(c)(i)****C. Replacement Parts**

- i. Assessment and identification of replacement parts and development of procurement plan with existing suppliers.

**Response:**

Genera continued assessing and identifying replacement parts during the semester by coordinating closely with Warehouse, Operations, and Procurement to determine essential material needs for the Legacy Generation Assets. Inventory movement history and stock levels are being reviewed and adjusted to support the availability of replacement parts for scheduled maintenance and outage work.

As part of this process, Warehouse is refining item classifications in Asset Suite, correcting duplicated descriptions, and organizing materials into the appropriate categories to support clearer visibility and more accurate procurement planning. Weekly coordination meetings between Warehouse, Operations, and Procurement also support prioritization of orders and alignment of replacement part needs with existing supplier capabilities.

In parallel, Genera expanded its supplier base, registering 33 new suppliers between August and October to strengthen sourcing flexibility and enhance procurement planning for replacement parts.

**Q2 Update:**

During Q2, Genera continued advancing the evaluation and identification of critical replacement components required to support the Legacy Generation Assets. Cross-functional coordination among Warehouse, Plant Operations, and Procurement supported the review of historical consumption data and current inventory balances to confirm alignment between material requirements, scheduled maintenance activities, and planned outages.

Ongoing data cleansing and optimization efforts within Asset Suite remain a priority. Warehouse continues standardizing item descriptions, eliminating

duplicate records, and improving material categorization to enhance data accuracy and strengthen procurement planning visibility. These refinements support more reliable demand planning and better alignment with operational needs.

Weekly cross-functional meetings remain in place to support consistent communication regarding replacement part priorities, supplier performance, and upcoming requirements. This structure enables proactive planning with existing suppliers while mitigating supply chain risks.

Additionally, Genera further strengthened its sourcing strategy by onboarding seventy-three (73) new suppliers from October through February, increasing competition, expanding sourcing alternatives, and enhancing flexibility in procurement planning for replacement materials.

### **Q3 Update:**

During Q3, Genera continued progressing in the assessment and identification of replacement parts required to support the Legacy Generation Assets. Cross-functional coordination among Warehouse, Plant Operations, and Procurement remained active, with ongoing review of inventory levels and consumption history to ensure material availability aligns with scheduled maintenance and outage planning.

Data quality efforts within Asset Suite continued, with Warehouse maintaining the standardization of item descriptions, removal of duplicate records, and refinement of material categorization to support accurate procurement planning and demand forecasting.

As part of ongoing process improvement initiatives, Procurement and Warehouse collaborated on constraining projects aimed at optimizing procurement and inventory management processes, improving alignment between material requisitioning, stock control, and supplier ordering to reduce inefficiencies and support more effective planning.

Weekly coordination meetings between Warehouse, Operations, and Procurement remained in place, enabling timely communication on replacement part priorities and supplier alignment. Genera also continued

expanding its supplier base during this period, onboarding thirty-eight (38) new suppliers, further strengthening sourcing flexibility and supporting a competitive procurement environment for replacement materials.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C3(c)(ii)**

- i. Process of seeking alternative parts and suppliers for existing replacement parts.

**Response:**

Genera continued expanding and diversifying its supplier base to identify alternative parts and vendors for existing replacement needs. Between August and October, 33 new suppliers were registered, supporting the ongoing effort to ensure multiple sourcing options, improve availability of replacement parts, and strengthen supply chain resilience.

**Q2 Update:**

During Q2, Genera continued advancing the evaluation and identification of critical replacement components required to support the Legacy Generation Assets. Cross-functional coordination among Warehouse, Plant Operations, and Procurement supported the review of historical consumption data and current inventory balances to confirm alignment between material requirements, scheduled maintenance activities, and planned outages.

Ongoing data cleansing and optimization efforts within Asset Suite remain a priority. Warehouse continues standardizing item descriptions, eliminating duplicate records, and improving material categorization to enhance data accuracy and strengthen procurement planning visibility. These refinements support more reliable demand planning and better alignment with operational needs.

**Q3 Update:**

Genera continued its efforts to identify and secure alternative parts and suppliers for existing replacement needs. Cross-functional coordination among Warehouse, Plant Operations, and Procurement supported the ongoing evaluation of sourcing options to ensure availability of critical components for the generation assets.

Collaboration between Procurement and Warehouse through constraining projects further supported the identification of alternative materials and vendors, streamlining the process of evaluating equivalent parts and aligning supplier capabilities with operational requirements.

Additionally, Genera is currently developing integration processes for new platforms to support outsourcing capabilities and improve the overall procurement process, enhancing visibility, efficiency, and sourcing flexibility for replacement parts management.

**GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C3(d)**

d. Identify and quantify the space and cost savings for all categories.

**Response:**

All orders are placed within the estimated amount and in accordance with the approved budget to ensure the planned savings are achieved.

**Q2 Update:**

During Q2, Genera continued maintaining strict budgetary controls that support adherence to approved financial thresholds and alignment with allocated funding. Continuous monitoring mechanisms between Procurement, Finance, and Warehouse support validation that expenditures are consistent with forecasted demand and operational requirements.

Space optimization efforts remain ongoing through improved inventory management practices, including review of stock levels, elimination of duplicate materials, and refinement of item classifications within Asset Suite. These measures contribute to more efficient warehouse utilization and reduction of excess or obsolete inventory.

From a cost perspective, adherence to competitive sourcing practices, expansion of the supplier base, and alignment of purchase volumes with demand planning continue to support cost containment objectives. While quantifiable savings remain tied to budget execution and inventory optimization initiatives, procurement controls support expenditures remaining within projected cost parameters and contribute to overall operational efficiency.

**Q3 Update:**

During Q3, Genera continued advancing efforts to identify and quantify space and cost savings across procurement categories. Procurement, Finance, and Warehouse teams maintained ongoing coordination to ensure expenditures remain aligned with approved budgets and forecasted operational requirements.

Space optimization efforts progressed through continued inventory management improvements, including further refinement of stock levels, elimination of duplicate and obsolete materials, and enhanced item categorization within the Asset Suite platform. These efforts contribute to more efficient warehouse utilization and improved visibility of available inventory, supporting better space allocation decisions.

From a cost perspective, the expansion of the supplier base and the implementation of constraining projects between Procurement and Warehouse have supported cost containment objectives by improving process efficiency and reducing redundancies. The ongoing development of integration processes for new procurement platforms is expected to further enhance cost visibility and sourcing competitiveness across categories.

Genera continues reinforcing its commitment to disciplined procurement practices, ensuring that all orders are placed within approved financial thresholds while advancing initiatives that contribute to measurable space and cost savings going forward.

## **C4. Obtaining Best Part Price**

### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C4**

Report on Genera's success in obtaining the best part price through competitive bidding and achievement of the goals of "best quality part fit" and "best part price" through the network source process.

#### **Response:**

Genera has consistently achieved competitive pricing and quality standards through a structured sourcing process that prioritizes transparency and market competitiveness. All major procurements are conducted through formal bidding using Power Advocate ERP, ensuring multiple qualified suppliers are evaluated based on both price and technical criteria.

Through this process, Genera has successfully secured the best part prices while maintaining the highest standards of quality and fit. The supplier network continues to expand, enhancing competition and driving cost efficiency. As a result, the company has met and, in several cases, exceeded its goals of obtaining the best quality part fit and the best part price across multiple categories.

#### **Q2 Update:**

During Q2, Genera continued reinforcing its competitive sourcing framework to promote optimal pricing and technical suitability for all critical parts. Formal bidding processes conducted through the Power Advocate platform remain the primary mechanism for market engagement, enabling structured evaluation of qualified suppliers under both commercial and technical criteria.

The network sourcing strategy has further strengthened supplier competition by leveraging an expanded vendor base and encouraging multi-bid participation across key categories. This approach enhances price benchmarking, improves negotiation leverage, and supports alignment with plant-specific technical requirements.

In addition, cross-functional review between Procurement and Operations confirms alignment with operational performance standards, minimizing the

risk of rework, compatibility issues, or downtime. Through disciplined bid evaluation and supplier engagement, Genera continues to secure cost-efficient pricing while maintaining reliability and quality standards across its generation fleet.

**Q3 Update:**

During Q3, Genera continued reinforcing its competitive sourcing framework to promote optimal pricing and technical suitability for all critical parts. Formal bidding processes conducted through the Power Advocate platform remained the primary mechanism for market engagement, enabling structured evaluation of qualified suppliers under both commercial and technical criteria.

The network sourcing strategy continued strengthening supplier competition by leveraging an expanded vendor base and encouraging multi-bid participation across key categories, enhancing price benchmarking, improving negotiation leverage, and supporting alignment with plant-specific technical requirements.

## **C5. Spares Quality Assurance Program**

### **GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C5(a)**

- a. Detail and quantify the status of development and implementation and results of the Purchased Material Inspection (PMI) program for spare parts.

#### **Response Q3:**

Genera finalized the Shared Service Agreement with LUMA and has completed the installation of its independent Enterprise Asset Management (EAM) environment in Hitachi Asset Suite 9 (AS9). Configuration activities are currently underway to support the full integration of the Purchase Material Inspection (PMI) program into the CMMS platform. In parallel, Genera continues the registration and validation of spare parts inventory within the system to support maintenance planning, tracking, and reliability improvements. These efforts are intended to strengthen maintenance management capabilities, improve equipment history and inventory control, and enhance the effectiveness of preventive and predictive maintenance activities across the generation fleet.

**GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C5(b)**

- b. Detail and quantify the status of linking PMI to computerized maintenance management system (CMMS) and effectiveness in achieving stated results.

**Response Q3:**

Please see response GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C5(a)

## **C6. Warehouse Management Software**

### **GPR-PREB-NEPRMI20210014- 20240226-ATTA #C6**

- a. Detail and quantify Genera's implementation and use of a Computerized Maintenance Management System (CMMS) or Enterprise Asset Management (EAM) to optimize and integrate the maintenance operations of the power facilities.
- b. Report on the status of Genera's assessment of technology to use after December 31, 2023, when the shared services agreement including Asset Suite ends.

#### **Response:**

As part of this transition, Genera is evaluating long-term technology options to determine whether Asset Suite 9 should remain in place or be replaced with a solution better aligned with industry's best practices. The IT Department is currently developing and customizing the systems to meet Genera's operational requirements.

#### **Q2 Update:**

Genera IT department is currently developing and customizing the Asset Suite Inventory System to meet operational requirements.

#### **Q3 Update:**

Genera's IT Department completed the integration of Power BI with Asset Suite. Both systems are currently used to support daily warehouse and procurement operations, including stock item dispatch reporting, internal material transfers between warehouses and LUMA, replenishment reporting for the acquisition of materials and services, and purchase order tracking for both the Procurement and Warehouse Departments.

## **C9. Critical parts**

### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C9(a)**

- a. Report on the status and success of Genera's plans to expedite orders for critical parts with quantity 0.

#### **Response:**

Genera continued prioritizing the identification and procurement of critical parts with zero on hand quantities. Weekly coordination meetings between Warehouse, Operations, and Procurement support the prioritization of these items, allowing the teams to expedite orders based on maintenance schedules, outage needs, and inventory movement.

Improvements to Asset Suite, including category classifications, minimum thresholds that trigger purchase flags, and ongoing corrections to duplicated descriptions, are strengthening visibility of critical parts that require immediate replenishment. Additionally, the registration of 33 new suppliers between August and October increased sourcing options, supporting Genera's ability to accelerate orders for critical materials.

Daily monitoring of inventory data through Asset Suite, combined with the IT Department's development of new Power BI reporting tools, is further enhancing Genera's ability to track, forecast, and expedite orders for critical parts with zero stock.

#### **Q2 Update:**

Inventory data through Asset Suite and Power BI reporting tools enhance warehouse management to track, forecast, and expedite orders for critical parts with zero stock inventories.

#### **Q3 Update:**

The Operations, Warehouse, and Procurement Departments continue integrating inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management and inventory control. These systems

support the tracking, forecasting, and expedited procurement of critical parts, particularly for zero-stock inventory items, helping minimize delays in maintenance activities and unit repairs.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C9(b)**

b. Identify any critical parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

**Response:**

After performing a forensic inventory of all the critical, major and minor parts, Genera implemented an action plan to replenish the warehouses. First, an assessment was performed with Operations to establish the parts that were necessary or required for the operation. Doing so prevented Genera from acquiring parts that are no longer used or obsolete.

The parts were identified and classified based on units already out of service or scheduled for maintenance and which ones had priority. An assessment of the critical parts that could be purchased using federal funds was made. After assessing these variables, the Warehouse Department engaged the Procurement team to procure these critical parts. Critical parts that could be obtained from the OEM or from an exclusive supplier were directly sourced to move forward the efforts. For other critical parts, the Procurement team used the strategic sourcing method, including the use of Master Services Agreements.

Moving forward, Genera will keep using the Master Service Agreements. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket PO.

**Q2 Update:**

Genera will keep using the Master Service Agreements contract. This type of contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket Purchased Order (PO).

**Q3 Update:**

Genera will keep using the Master Service Agreements type of contract. This contract allows for requests through task orders without going through the procurement process because the terms and conditions are already agreed upon, and the contract is already awarded with sufficient funds, taking into consideration future requests. This contract is also known as a blanket Purchased Order (PO). The Operations and Warehouse/Procurement departments are integrating Inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management to track, forecast, and expedite orders for critical parts with zero stock inventories.

**C10. Major and Minor Parts****GPR-PREB-NEPRMI20210014-20240226-ATTA #C10(a)**

- a. Report on the status and success of Genera's plans to expedite orders for major and Minor Parts with quantity 0.

**Response:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226-ATTA #C9(a).

**Q2 Update:**

Pursuant to the stated above, inventory data through Asset Suite and Power BI reporting tool enhance warehouse management to track, forecast, and expedite orders for critical parts with zero stock inventories.

**Q3 Update:**

The Operations and Warehouse/Procurement Departments continue integrating inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management capabilities. These systems support the tracking, forecasting, and expedited procurement of both major and minor critical parts, particularly for zero-stock inventory items, helping reduce delays in maintenance activities and unit repairs.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C10(b)**

- a. Identify any Major and Minor Parts with quantity 0, status of obtaining those parts and of making sure such situations are reduced or eliminated.

**Response:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226-ATTA #C9(a).

**Q2 Update:**

Inventory data through Asset Suite and Power BI reporting tool enhance warehouse management to track, forecast, and expedite orders for critical parts with zero stock inventories.

**Q3 Update:**

The Operations and Warehouse/Procurement Departments continue integrating inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management capabilities. These systems support the tracking, forecasting, and expedited procurement of major and minor critical parts, particularly for zero-stock inventory items, helping reduce delays in maintenance activities and unit repairs. In parallel, the Procurement Department continues coordinating with Operations to identify and pursue FEMA funding opportunities to support future repairs and reliability improvements for Genera's legacy generation units.

**C11. Plan to address shortage of critical parts****GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(a)**

- a. Report on the status and success of Genera's plans to address shortage of critical parts requiring long lead times.

**Response:**

Genera has implemented alternative logistics strategies to mitigate the impact of long lead times and ensure operational continuity. Delivery time is used as a key evaluation criterion when sourcing materials identified as critical or time sensitive. The company continuously monitors inventory levels and coordinates proactive replenishment to maintain adequate stock and meet established performance metrics. These actions have strengthened supply chain resilience and reduced the risk of operational delays caused by parts shortages.

**Q2 Update:**

No update. See Q1 response.

**Q3 Update:**

During Q3, Genera continued implementing the strategies established in Q1 to address shortages of critical parts with long lead times. Delivery time remained a key evaluation criterion in the sourcing process, and inventory monitoring and proactive replenishment efforts continued to ensure adequate stock levels for critical components supporting the Legacy Generation Assets.

Coordination among Procurement, Warehouse, and Operations supported ongoing visibility of material requirements and early identification of potential supply gaps, enabling timely action to mitigate the risk of operational delays. These efforts continue to strengthen supply chain resilience and maintain alignment with established performance metrics.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(b)**

b. Report on the status and accuracy of projected timelines and cost estimates.

**Response:**

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226 #4.

**Q2 Update:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #4.

**Q3 Update:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #4.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(c)**

c. Describe the effectiveness of procurement procedures.

**Response:**

Genera's procurement procedures have proven to be highly effective in ensuring transparency, compliance, and value creation across all sourcing activities. The process is guided by standardized policies that promote competitive bidding, supplier diversity, and adherence to regulatory and internal controls.

Each procurement event is carefully evaluated based on technical, financial, and delivery criteria to ensure that all awards are made in the best interest of operational efficiency and cost optimization. Continuous monitoring and process improvements have resulted in reduced lead times, improved supplier performance, and consistent alignment with corporate and regulatory objectives.

Overall, the procurement framework effectively supports Genera's commitment to accountability, fairness, and sustainable operational excellence.

**Q2 Update:**

Genera's procurement procedures continued to demonstrate strong operational and governance effectiveness. Established controls and approval workflows remain fully implemented, ensuring that sourcing activities are conducted in accordance with internal policies, delegated authority limits, and applicable regulatory requirements.

The structured procurement lifecycle — from requisition validation through bid evaluation and contract award — continues to promote fairness, documentation integrity, and audit traceability. Competitive processes are consistently utilized when applicable, reinforcing market discipline and supporting cost efficiency objectives.

Ongoing coordination among Procurement, Finance, Legal, and Operations has strengthened oversight and reduced processing gaps, while system-based

controls within Power Advocate and Asset Suite provide additional visibility into procurement activities. These combined measures contribute to improved cycle time management, enhanced supplier accountability, and sustained alignment with Genera's operational and compliance standards.

**Q3 Update:**

Genera's procurement procedures continued to operate effectively during Q3, maintaining strong governance, transparency, and compliance throughout all sourcing activities. Procurement controls, approval workflows, and competitive solicitation practices remained consistently applied in alignment with internal procurement policies, delegated authority thresholds, and applicable regulatory requirements.

During the quarter, Procurement further strengthened coordination with cross-functional stakeholders including Finance, Legal, Operations, and Regulatory to enhance procurement planning, contract oversight, and documentation completeness. Additional focus was placed on improving procurement file integrity, evaluation panel governance, and regulatory readiness for federally funded and formally competed processes.

System-driven controls through ERP and procurement tools continued to provide visibility, traceability, and audit support across the procurement lifecycle. These tools, combined with ongoing process standardization initiatives and continuous monitoring efforts, contributed to improved cycle time management, enhanced supplier accountability, and increased operational efficiency.

Overall, Genera's procurement framework continues to effectively support fair competition, responsible stewardship of funds, operational continuity, and sustained compliance with corporate and regulatory expectations.

**C12. Procurement of spare parts with long lead times****GPR-PREB-NEPRMI20210014-20240226-ATTA #C12(a)**

- a. Report on the status and accuracy of identifying long lead time spares.

**Response:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(a).

**Q2 Update:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226-ATTA #C11(a).

**Q3 Update:**

The Warehouse and Procurement Departments continue integrating inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management capabilities, including the tracking, forecasting, and expedited procurement of critical parts from suppliers and manufacturers. In parallel, Procurement continues coordinating with Operations and PMO personnel regarding future maintenance schedules, allowing Genera to acquire critical parts in a timely manner to support repairs and minimize the risk of outages.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C12(b)**

Report on the status, details, and effectiveness of multi-faceted approach for:

- i. Long term agreements
- ii. Make and hold
- iii. Blanket PO
- iv. Vendor-managed inventory
- v. Consignment stocking

**Response:****Long-Term Agreements:**

Long-term agreements are actively in place and function effectively to support maintenance, emergency response, and repair activities. These agreements ensure continuity of supply, stable pricing, and improved coordination with key suppliers for critical materials and services.

**Blanket Purchase Orders (BPOs):**

Blanket POs are also established and operating successfully to streamline recurring purchases related to maintenance, emergency needs, and repair work. This approach enables faster order processing, cost control, and alignment with approved budgets.

**Vendor-Managed Inventory (VMI):**

Vendor-managed inventory programs are being implemented to strengthen material availability for critical components. Under this model, suppliers maintain agreed stock levels at Genera's facilities, ensuring timely replenishment, reduced lead times, and improved operational efficiency.

**Q2 Update:**

No update.

**Q3 Update:**

During Q3, Genera continued to leverage its multi-faceted procurement and inventory management approach to support operational reliability, material

availability, and cost efficiency across maintenance and emergency response activities.

Long-term agreements and Blanket Purchase Orders (BPOs) remained active and effective in supporting recurring operational requirements, enabling improved planning, pricing stability, and expedited procurement response times for critical materials and services. These mechanisms continue to reduce administrative processing efforts while maintaining compliance with procurement controls and approved budgets.

Improving replenishment coordination with suppliers and increasing visibility into critical stock availability. Coordination with internal operational and warehouse teams also continued to strengthen inventory planning and material readiness.

Additionally, ongoing evaluations of inventory management strategies, including consignment stocking opportunities and make-and-hold arrangements for selected critical components, continued as part of Genera's broader supply chain reliability and operational continuity efforts. These combined strategies continue to contribute positively to lead time reduction, supplier responsiveness, and overall operational support effectiveness.

### **C13. Synchronization of spare parts inventory with legacy power plants' repair schedules**

#### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)**

- a. Report on the status of the Unit Maintenance Plan for Boilers and Turbo Generators being coordinated with LUMA.

#### **Response:**

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a).

#### **Q2 Update:**

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a).

#### **Q3 Update:**

Please refer to attachment GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a).

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)(i)**

- i. Provide reasons for any maintenance delays and describe mitigating measures identified to reduce future and shorten existing delays.

**Response:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #3 & GPR-PREB-NEPRMI20210014-20240226 #5.

**Q2 Update:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #3 & GPR-PREB-NEPRMI20210014-20240226 #5.

**Q3 Update:**

Please refer to answer GPR-PREB-NEPRMI20210014-20240226 #3 & GPR-PREB-NEPRMI20210014-20240226 #5.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(b)**

1. Report on accuracy of work packages including availability of parts, equipment, and design among the other designated components.

**Response:**

To support improvements, the IT Department is developing new Power BI reports, and inventory data is being monitored daily through the front end of Asset Suite to strengthen visibility and improve planning for work packages.

**Q2 Update:**

IT department has developed new Power BI reports and inventory data that has increased accuracy performing inventories controls on all stock items. They are continually improving power BI reports to warehouse bins and locations on real time specifics.

**Q3 Update:**

Power BI reports and inventory data integration have improved the accuracy of inventory control processes for all stock items. Genera continues enhancing Power BI reporting capabilities to provide real-time visibility into warehouse bins and storage locations. In parallel, warehouse supervisors and engineers continue coordinating efforts to improve stock item descriptions and align them with industry standards, supporting the accurate procurement of new materials required for the operation and maintenance of Genera's legacy generation units.

**C14. Verification of spare part quantities as compared with inventory list****GPR-PREB-NEPRMI20210014-20240226-ATTA #C14**

Report on the status and accuracy of the extensive inventory audit at all facilities.

**Response:**

To strengthen accuracy and oversight, Genera maintains a contract with DCMC to perform daily inventories across all four warehouses using DCMC's dedicated inventory personnel. DCMC provides daily reports and promptly communicates any discrepancies to Genera's Logistics Manager, ensuring continuous monitoring and improved accuracy of inventory records.

**Q2 Update:**

Genera maintains a contract with the consulting firm to perform daily inventories across all four warehouses using dedicated inventory personnel. The consulting firm provides daily reports and promptly communicates any discrepancies to Genera's Logistics Manager, ensuring continuous monitoring and improved accuracy of inventory records.

**Q3 Update:**

Genera maintains a contract with a consulting firm to perform daily inventories across all four warehouses using dedicated inventory personnel. The consulting firm provides daily reports and promptly communicates any discrepancies to Genera management, ensuring continuous monitoring and improved accuracy of inventory records.

## **C 15. Incomplete inventory information**

### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C15**

- a. Report on the status of eliminating current and future instances of missing information for critical and major items for Unit Cost, Quantity in Stock, Required Quantities and Total Cost.

#### **Response:**

The Warehouse Department is currently addressing system glitches to customize the Asset Suite 9 platform for Genera's operational use. Once the system is fully tailored to Genera's operational needs, warehouse supervisors will begin preparing a new catalog of items in coordination with operations personnel.

#### **Q2 Update:**

The Warehouse department has access and privileges to create new catalog stock items in Asset Suite, subject to internal review and validation procedures.

#### **Q3 Update:**

The Warehouse supervisors have access and privileges to create new catalog stock items in Asset Suite, subject to internal review and validation procedures. They work closely with the end-user to guarantee all new stock items are created with technical descriptions accordingly to industries standards.

**C16. Critical items out of stock****GPR-PREB-NEPRMI20210014-20240226-ATTA #C16**

Provide status on:

- a. Eliminating instances of critical items out of stock
- b. Actual impact of critical items out of stock on the repair schedule and stabilization of units.
- c. Evaluation of replacement equipment and alternative parts supplies.
- d. Planned outage scopes of work, resource mapping, and risks that could affect the reliable operation of the fleet power plants.

**Response:**

Warehouse generated requests for replenishment of materials and critical parts components are being prepared with operations personnel using Asset Suite's master catalog document.

**Q2 Update:**

Warehouse supervisors are monitoring Asset Suite in coordination with Operations personnel to support the availability of critical parts for future repairs and potential emergency needs. Operations personnel have weekly meetings with warehouse supervisors in the planning process for daily operations and future repairs.

Planned outages are coordinated with Operations to address equipment updates and unit specific technical requirements. Warehouse management works closely with Operations to mitigate unit risk by conducting fleet inspections to identify wear and deterioration trends.

**Q3 Update:**

Warehouse supervisors are monitoring Asset Suite in coordination with Operations personnel to support the availability of critical parts for future repairs and potential emergency needs. Operations personnel have weekly meetings with warehouse supervisors in the planning process for daily

operations and future repairs. Planned outages are coordinated with Operations to address equipment updates and unit specific technical requirements. Warehouse management works closely with Operations to mitigate unit risk by conducting fleet inspections to identify wear and deterioration trends. Utilizing Asset Suite and Power BI warehouse supervisors can forecast any short supplies before commencing major or minor repairs.

**C 17. Genera's plan in the event of generating plant critical turbine failure****GPR-PREB-NEPRMI20210014-20240226-ATTA #C17**

Report on the readiness of Genera according to its plan in the event of critical turbine failure at any of the fleet power plants, including how any shortage or unavailability of critical parts that require long lead times is being addressed.

**Response:**

Over the past year, Genera has made progress in total generation capacity. This is the result of strategic projects implementing short-term repairs and maintenance work. Some examples include Aguirre 2, Palo Seco 3&4, Costa Sur 5 & 6, San Juan 5, among others. Genera is diligently working on having available MW to supply the power demand and support the stabilization of the power grid.

An increase in planned maintenance is key to keeping units working correctly, which helps reduce potential failures of critical parts. Having additional MW available helps Genera support the system in case of failure. If a unit is forced out of service, the generation fleet may still have the capacity to sustain the grid, preventing load-shedding events.

The Genera team is also assessing the conditions of the critical parts in the units and engaged in the procurement of critical components that, once installed, will improve the reliability of the fleet. These assessments allow for better planning and use of the unit. If Genera does not have sufficient stock in inventory, Genera is sourcing the parts from different suppliers, including refurbished if necessary. Additionally, Genera is reaching out to other utilities or businesses that may use the same system or have surplus in their warehouse that is still operational and in working conditions that can be purchased as spare part in case of an emergency or sudden failure.

**Q2 Update:**

Genera warehouse management is working with the IT department to validate inventory system parameters, including minimum and maximum stock levels,

incorporating a five-month lead time analysis to support critical component planning. Procurement will lead a team of supply planning and sourcing professionals to improve on-time delivery performance with suppliers.

**Q3 Update:**

Genera Warehouse Management continues utilizing Assert Suite and Power BI to validate inventory system parameters, including minimum and maximum stock levels while incorporating a five-month lead time analysis to support critical component planning. In parallel, Procurement Department continues leading supply planning and sourcing efforts to improve supplier on time delivery performance and ensure the timely availability of materials required for maintenance and repair activities.

## **C18. Benchmarks for Critical Spare Parts**

### **GPR-PREB-NEPRMI20210014-20240226-ATTA #C18(a)**

- a. Report on Genera's success in developing and meeting benchmarks for availability of critical spare parts.

#### **Response:**

Genera has selected vendors for over 95% of the critical spare parts. Some critical spare part RFPs did not receive a response. For those cases, Genera is reviewing the technical specifications published and contacting vendors to understand the constraints.

#### **Q2 Update:**

Genera is constantly working with both new and regular vendors to support the availability of critical parts across its warehouses. Genera also coordinate with Operations technicians to maintain alignment of inventory specifications with current operational requirements and applicable industry standards.

#### **Q3 Update:**

Genera continues using Asset Suite and Power BI to support coordination with both new and existing vendors and maintain availability of critical parts across its warehouses. Genera also coordinates with operations technicians to ensure inventory specifications remain aligned with current operational requirements and applicable industry standards.

**GPR-PREB-NEPRMI20210014-20240226-ATTA #C18(b)**

- b. Report on effectiveness and accuracy of Genera's process for determining whether inventory of critical and major parts is low and making sure adequate quantities are in place.

**Response:**

All stock items used by end users will automatically populate the replenishment window in Asset Suite. Warehouse supervisors review the suggested reorder list and prepare requisitions for any items that fall below the established maximum levels. Once approved, the requisitions are forwarded to Procurement, which initiates the bidding process and identifies the appropriate supplier to replenish materials for future operational needs.

Genera also maintains a cycle-counting process across all four warehouses to ensure accurate inventory records. This process enables the identification of items that are no longer in use and supports the correction or update of catalog descriptions as necessary, strengthening overall inventory accuracy and control.

**Q2 Update:**

Genera is working with the support of a contractor to perform cycle count inventories across four warehouses. The contractor supports warehouse supervisors in identifying inventory discrepancies, allowing supervisors to take corrective measures to maintain accurate inventory balances.

**Q3 Update:**

Genera continues utilizing Asset Suite and Power BI, with the support of a specialized contractor, to perform cycle count inventories across its four warehouses. The contractor assists warehouse supervisors in identifying inventory discrepancies and variances, allowing corrective actions to be implemented in a timely manner to maintain accurate inventory records and stock balances.

**Attachments to GPR-PREB-NEPRMI20210014-20240226 #5**

- GPR-PREB-NEPRMI20210014-20240226 #5 – January 2026
- GPR-PREB-NEPRMI20210014-20240226 #5 – February 2026
- GPR-PREB-NEPRMI20210014-20240226 #5 – March 2026

January 2026					
Unit	Description	Out Date	In Date	Duration (Hrs)	Corrective Action
Aguirre 2	Unit tripped due to instrument air header pressure loss.	3-Jan-26	3-Jan-26	10.48	IACs were restored to normal operation (oil make-up completed), and the unit was successfully synchronized.
Aguirre CC 1-2	Continuation from previous month. The work continued on oil leak in the inlet guide vanes block.	1-Jan-26	2-Jan-26	45	The piston and inlet guide valve block were replaced. The fuel bypass valve solenoids were changed.
Aguirre CC 2-1	Trip due to lockout generator, relay #40 (loss of excitation), external trip, and fuel.	18-Jan-26	20-Jan-26	38.9	Reset the EX2100 and calibrate the fuel bypass valve, a megger test was done on the generator, managed to raise the generator breaker that had tripped on one side.
Aguirre CC 2-4	Excitation problem, excitation loss, relay #40, and generator lockout.	29-Jan-26	29-Jan-26	2.30	The 180 ohms resistor in the excitation system of the exciter was replaced. The one from unit 2-3 was used.
Costa Sur 5	Feedwater valves	11-Jan-26	25-Jan-26	343.08	Heater #6 inlet valve repaired.
Costa Sur 5	Boiler tube leaks platen superheater	27-Jan-26	31-Jan-26	97.13	Broken Boiler tubes repaired, hydrostatic test performed.
Mayaguez 4B	The unit tripped due to secondary fan alarm.	11-Jan-26	11-Jan-26	4.47	Worked on the fan limit switch and alarm setting, and solved the issue.
Mayaguez 4B	Water Injection Level Switch was damaged.	18-Jan-26	20-Jan-26	41.37	A water injection level switch was replaced.
Palo Seco 1-2	Starting System failure	24-Jan-26	26-Jan-26	47.65	Acceleration control valve in Diesel Engine replacement.
Palo Seco MP 1	DC Lube Oil Pump Generator failure.	23-Jan-26	24-Jan-26	23.92	Pump motor replacement.
Palo Seco MP 2	DC Lube oil Pump Generator failure.	3-Jan-26	5-Jan-26	47.43	Lube Oil Pump Motor replacement.
Palo Seco MP 2	Diesel fuel Pump Oil leak.	5-Jan-26	6-Jan-26	17.53	Pump Seal and packing replacement.
Palo Seco MP 2	AC lube oil motor failure.	16-Jan-26	17-Jan-26	21.55	AC pump motor replacement.
Yabucoa 1-2	Torque Converter failure.	25-Jan-26	31-Jan-26	155	During inspection, an SSS clutch failure was found. In process of replacement.
Palo Seco TM 2	Problems with Regas protection system, low gas supply pressure.	5-Jan-26	5-Jan-26	0.55	The gas plant normalized their pumps.
San Juan CT 5	Non-authorized works were done on Breaker 5E-1. Emergency Breaker was closed causing normal to open, then the emergency breaker was opened, leaving both breakers open.	21-Jan-26	21-Jan-26	1.05	Procedures were in place. Personnel was trained and advised.
San Juan ST 5	Non-authorized works were done on Breaker 5E-1. Emergency Breaker was closed causing normal to open, then the emergency breaker was opened, leaving both breakers open.	21-Jan-26	26-Jan-26	118	Procedures were in place. Personnel was trained and advised.
San Juan CT 6	Vacuum loss due to vacuum pump bravo uncoupling and discharge valve left open.	27-Jan-26	27-Jan-26	3.2	Vacuum pump bravo in repairs.
San Juan ST 5	Vacuum loss due to vacuum pump bravo uncoupling and discharge valve left open.	27-Jan-26	27-Jan-26	8.5	Vacuum pump bravo in repairs.

San Juan 9	Voltage regulator failed when switched from manual to auto.	30-Jan-26	30-Jan-26	8.33	Megger tests were done. No faults found.
San Juan TM 1	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	31-Jan-26	193.17	Work in progress.
San Juan TM 2	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	27-Jan-26	114.35	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 2	Lube oil system problems.	18-Jan-26	18-Jan-26	2.05	Replaced N47 relay switch.
San Juan TM 3	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	27-Jan-26	114.35	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 4	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	26-Jan-26	91.53	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 5	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	24-Jan-26	44.02	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 5	Gas leak on manifold, J-tubes and convoluted hoses.	23-Jan-26	29-Jan-26	126.12	Replaced gas manifold, J-tubes and convoluted hoses.
San Juan TM 6	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	24-Jan-26	44.02	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 7	Issue with the water injection pump.	13-Jan-26	14-Jan-26	15.49	The water injection pump was replaced.
San Juan TM 7	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	24-Jan-26	44.02	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.
San Juan TM 10	Due to a failure on the isolators from the metal clad cabinet near GT-01 the breaker on the Main Power Transformer opened causing a trip to the rest of the units.	22-Jan-26	24-Jan-26	44.02	The fault on the cabinet was isolated and proceeded to close the breaker on the Main Power Transformer. EDG#1 was repaired and 480v was available for auxiliary equipments on the unit.

**February 2026**

<b>Unit</b>	<b>Description</b>	<b>Out Date</b>	<b>In Date</b>	<b>Duration (Hrs)</b>	<b>Corrective Action</b>
Aguirre 2	Boiler tube leakage / waterwall area.	6-Feb-26	9-Feb-26	81.38	Corrective Maintenance activities were performed. Unit was synchronized to the grid.
Aguirre 2	Boiler tube leakage / waterwall area.	24-Feb-26	28-Feb-26	115.18	Corrective Maintenance activities were performed, including boiler air in leakage (ash hopper area). Unit was synchronized to the grid.
Aguirre CC 2-1	Exciter to Mark VIe communication fault. Ex2100 trip alarm.	25-Feb-26	25-Feb-26	1.1	EX2100 and Mark VIe were reset; unit was put in service.
Cost Sur 5	Generator neutral grounding equipment.	2-Feb-26	2-Feb-26	3.99	Cleaning and maintenance performed.
Palo Seco 4	High temperature in unit 3/4 server room.	17-Feb-26	18-Feb-26	13.63	Server room cooling system fixed.
Palo Seco MP 2	Lube Oil Pressure Drain High Breeder.	18-Feb-26	28-Feb-26	239.5	In process of troubleshooting.
Palo Seco MP 3	Gen Lube Oil Pump Coupling failure.	21-Feb-26	28-Feb-26	175.07	Waiting for coupling delivery.
Palo Seco 1-2	Starting System failure, DC Control cable damage.	18-Feb-26	20-Feb-26	46.5	DC Control cable replaced.
San Juan CT 5	Bladepath variance.	7-Feb-26	7-Feb-26	3.3	Inspected and corrected.
San Juan ST 5	High vibrations.	7-Feb-26	14-Feb-26	172.27	Inspected and nothing found.
San Juan 9	Broken boiler lines.	15-Feb-26	15-Feb-26	1.67	Boiler lines fixed.

March 2026					
Unit	Description	Out Date	In Date	Duration (Hrs)	Corrective Action
Aguirre 2	Boiler tube leakage / waterwall area.	1-Mar-26	2-Mar-26	33.7	Continuation of previous month. Corrective Maintenance activities were performed, including boiler air in leakage (ash hopper area). Unit was synchronized to the grid.
Aguirre CC 2-1	No progress in startup, relay activated and generator lockout.	10-Mar-26	12-Mar-26	49.2	Cable of the heater output bars. They repaired the heater cable, changed the insulation of the bars, and performed a megger test.
Aguirre CC 2-1	Fuel control issue.	31-Mar-26	31-Mar-26	2	Work in progress.
Aguirre CC 2-2	No progress in startup, relay activated and generator lockout. It was unit 2-1 but the bars are joined at the outputs.	10-Mar-26	12-Mar-26	49	Cable of the heater output bars. They repaired the heater cable, changed the insulation of the bars, and performed a megger test.
Aguirre CC 2-2	Forced unit shutdown because the Inlet Guide Vane (IGV) did not open.	21-Mar-26	22-Mar-26	24.7	Calibrated the IGV that were stuck and transmitters.
Aguirre CC 2-4	Unit did not start due to vibrations in bearing #1.	15-Mar-26	15-Mar-26	1.6	Changed the vibration sensor of bearing #1.
Cambalache 2	Stage 3 Blow-Off Valve failure. On March 1st, with the unit online at base load, an open valve alarm was triggered. The unit remained online in that condition until it was taken offline by the TOC.	2-Mar-26	2-Mar-26	1.82	Mechanical opening and closing tests of the valve were performed. The valve closing indicator switch was replaced.
Cambalache 3	Turbine Vane 3 broken shim	1-Mar-26	10-Mar-26	234.73	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Cambalache 3	Turbine Vane 3 broken shim	11-Mar-26	11-Mar-26	14.5	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Cambalache 3	Turbine Vane 3 broken shim	11-Mar-26	13-Mar-26	42.47	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Cambalache 3	Turbine Vane 3 broken shim	13-Mar-26	14-Mar-26	21.88	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Cambalache 3	Turbine Vane 3 broken shim	14-Mar-26	15-Mar-26	22.07	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Cambalache 3	Turbine Vane 3 broken shim	15-Mar-26	16-Mar-26	20.27	Class-C Service. Unit reassembly. Turbocharger balancing. Commissioning.
Mayaguez 4A	Unit was no available due to a major overhaul. The entire gas generator component was out. Gas generator includes: compressor, combustors and turbine.	1-Mar-26	17-Mar-26	400.3	Continuation of previous month. On March 5, the installation began. Tests were performed.
Mayaguez 4A	Unit Vacuum Pump was not working. Chip detectors were lealing.	23-Mar-26	23-Mar-26	4.25	The replacemnt of the Vacuum Pump Equipment was performed. A torque adjustment were made in the lines of the chip detectors.
Mayaguez 3A	Speed sensor was giving problems during turn down.	8-Mar-26	8-Mar-26	11.23	Calibration was performed.
Mayaguez 3A	Speed sensor trip.	19-Mar-26	19-Mar-26	11.77	A reset was performed.
Mayaguez 3A	Speed sensor trip.	21-Mar-26	21-Mar-26	10.07	A reset was performed.
Mayaguez 3A	Speed sensor trip.	22-Mar-26	22-Mar-26	10.38	A reset was performed.

Mayaguez 3A	Unit was not injecting water.	30-Mar-26	30-Mar-26	2.28	Pressure transmitters were calibrated.
Mayaguez 3A	Unit was not injecting water.	30-Mar-26	31-Mar-26	17.42	A flow meter replacement was performed.
Mayaguez 4B	The gas generator was being installed on Unit 4A, and the shaft connecting to the generator was also being aligned. This required a LOTO on the starter, which is limiting Unit 4B.	8-Mar-26	12-Mar-26	97.22	Once the shaft was installed and aligned, authorization was granted to remove the LOTO, releasing the starter and making Unit 4B available.
Mayaguez 4B	An inspection on solenoid valve was conducted, taking advantage of the forced outage via circuit 4A.	23-Mar-26	23-Mar-26	4.25	It was determined that a change was needed. An order was placed.
Mayaguez 4B	Unit trip due to flame out.	24-Mar-26	25-Mar-26	23.13	A governor solenoid was replaced.
Mayaguez 4B	Solenoid valve failure.	26-Mar-26	26-Mar-26	2.53	The solenoid valve was replaced.
San Juan TM 2	Lube oli system problems	2-Mar-26	2-Mar-26	0.42	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 2	Lube oli system problems	4-Mar-26	4-Mar-26	12.22	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 2	Lube oli system problems	7-Mar-26	7-Mar-26	0.45	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 2	Lube oli system problems	17-Mar-26	17-Mar-26	0.32	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 2	Lube oli system problems	19-Mar-26	19-Mar-26	1.5	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 2	Lube oli system problems	20-Mar-26	20-Mar-26	1.33	Verified generator oil levels and the connection to the oil level transmitter.
San Juan TM 6	NPT Hi Speed Derivative.	21-Mar-26	21-Mar-26	0.58	Replaced acelerometer
San Juan TM 2	Blackstart Diesel Fuel Pump Failure.	21-Mar-26	26-Mar-26	116.72	Removed diesel fuel pump, none available in stock. A 480v external feeder was rerouted from GT-05 Switchgear to energize auxiliary equipments.
San Juan TM 3	Blackstart Diesel Fuel Pump Failure.	21-Mar-26	26-Mar-26	116.72	Removed diesel fuel pump, none available in stock. A 480v external feeder was rerouted from GT-05 Switchgear to energize auxiliary equipments.
San Juan TM 4	Liquid fuel primary manifold thermocouple failure	25-Mar-26	25-Mar-26	0.37	Replaced thermocouple on primary manifold liquid fuel system.
San Juan TM 2	Lube oli system problems	31-Mar-26	31-Mar-26	0.62	Verified generator oil levels and the connection to the oil level transmitter.
Jobs 1-2	Torque converter failure	1-Mar-26	3-Mar-26	65.3	Continuation from previous month. During inspection, an SSS clutch failure was found; it was replaced.
Jobs 1-2	Synchronization failure.	3-Mar-26	5-Mar-26	44.93	Inspection, cleaning connections and load breaker.
Jobs 1-2	Gas turbine vibration.	8-Mar-26	11-Mar-26	63.4	During inspection we found the defective accesory shaft. This axle was replaced with a new one.
Jobs 1-2	Gas turbine loses speed reference.	29-Mar-26	30-Mar-26	15.12	Replacement of speed sensor connection terminal.
Daguao 1-1	Main Power Transformer failure. Lockout activated.	1-Mar-26	14-Mar-26	312	Transformer output bus cleaning, lightning protection, generator output bus cleaning and megger.
Daguao 1-2	Unit does not synchronize.	7-Mar-26	10-Mar-26	73.3	The synchronization control in the MCC was replaced.
Palo Seco MP 1	Gas leak and Gen LO failure.	22-Mar-26	28-Mar-26	145.35	Replaced Gen LO motor, a gas hose and seals.
Palo Seco MP 3	Turbine oil leak.	3-Mar-26	4-Mar-26	31.5	Replaced seal.
Palo Seco 1-2	Control system issue.	7-Mar-26	9-Mar-26	47.87	Replaced I/O board.

Palo Seco 1-2	Excitation problem.	15-Mar-26	17-Mar-26	44.58	Replacement of brushes, cleaning and alignment.
San Juan 9	Operation error during transformer switch.	16-Mar-26	16-Apr-26	2.83	System was checked and greenlit.
San Juan 9	Circulating Water Pump 9-1 trip with bus bar B losing vaccum.	22-Mar-26	28-Mar-26	147.4	Boiler lines were fixed, swapped to circulating waster pump 9-2 while the 9-1 is in reparations.
San Juan CT 5	Fire protection system trip.	26-Mar-26	26-Mar-26	5.92	Found pullout box filled with rain water due to being broken and causing a short circuit and a false alarm.
San Juan CT 5	Hot reheat bypass issue.	8-Mar-26	8-Mar-26	6.17	Instrumentation section fixed.
San Juan ST 5	High vibration in bearing.	24-Mar-26	25-Mar-26	20.97	System checked and greenlit.
San Juan ST 5	Fire protection system trip.	26-Mar-26	26-Mar-26	9.35	System inspected and cleaned.
Palo Seco 4	Fuel pump 4-1 safety trip due to high amperage.	31-Mar-26	31-Mar-26	2.5	Fuel pump 3-2 was put in service. Fuel pump 4-1 will be swapped out.

**Attachment to #C13(a)**

GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a)



## UNIT MAINTENANCE PLAN

### BOILERS AND TURBO-GENERATORS

12/23/2025fcm

UNID.	CAP MV	2025												2026											
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SJ CT 5	160													Turbine Inspection											
SJ STM 5	60																								
SJ CT 6	160					Major Overhaul											Outage to install ST Rotor								
SJ STM 6	60																Major Overhaul								
SJ 7	100															Major Overhaul									
SJ 9	100												Major Overhaul & Environmental												
PS 3	216																Env. Maint								
PS 4	216	■	■	■	■	■	■	■	■	■	■	■	■	Generator fault repair + mayor outage environmental									Env. Maint.		
CS 5	410					Baskets & Env. Maint. 9-2025																Env. Maint.			
CS 6	410												Baskets & Env. Maint.							Gen. Rotor failure (Rewinding) / AH Baskets Environmental Outage					
AG 1	450		■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	
AG 2	450		■	■	■	■	■	■	■	■	■	■	■	Generator Failure Repair and AVR							Baskets & Env. Maint.				
CC Vap I	96	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	
CC Vap II	96	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	
Cambalache 2	82																Mayor Repair Insp C								
Cambalache 3	82					■	■	■	■	■	■	■	■	Repairs vane carrier after B-type inspect											
Eco CT 1	176								Annual Maint.																
Eco CT 2	176																				Annual Maint.				
Eco Vap	214																								
AES 1	254																								
AES 2	254																Annual Maint.								

Legend	
Current Progress	
Planned Maintenance	
Forced Outage	■
TOC provides information	