

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

<b>NEPR</b>  <b>Received:</b>  <b>Jun 11, 2026</b>  <b>6:28 PM</b>
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**IN RE:**

IN RE: REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY'S 10-  
YEAR INFRASTRUCTURE PLAN-  
DECEMBER 2020

**CASE NO. NEPR-MI-2021-0002**

**SUBJECT: Motion Submitting Scope of Work,  
Request for Confidentiality, and Supporting  
Memorandum of Law**

**MOTION SUBMITTING AMENDED SCOPE OF WORK, REQUEST FOR  
CONFIDENTIALITY, AND SUPPORTING MEMORANDUM OF LAW**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC** (jointly referred to as “LUMA”), through the undersigned legal counsel, respectfully submit the following:

**I. Submittal of Amended Scope of Work**

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority (“PREPA”) submit to the Energy Bureau the specific transmission and distribution projects (“T&D Projects” or “Projects”) to be funded with Federal Emergency Management Agency (“FEMA”) funds or any other federal funds at least thirty (30) calendar days prior to submitting these Projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”), FEMA or any other federal agency (“March 26<sup>th</sup> Order”). It also directed PREPA to continue reporting to the Energy Bureau and FEMA over the next five years on the progress of all ongoing efforts related to the approval of the submitted Projects that have not yet been approved by the Energy Bureau. The Energy Bureau thereafter determined that this directive should be applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On October 4, 2021, LUMA submitted a *Motion Submitting Updated List of Transmission and Distribution Projects and Thirty-Eight Scopes of Work* (“October 4<sup>th</sup> Motion”). In accordance with the March 26<sup>th</sup> Order, LUMA filed the Scope of Work (“SOW”) for the Energy Bureau’s review and approval prior to submitting it to COR3 and FEMA, titled “Acacias 6801 TC Relocation” SOW. *See Exhibit 1* to the October 4<sup>th</sup> Motion.

3. On October 18, 2021, the Energy Bureau issued a Resolution and Order (“October 18<sup>th</sup> Order”) in which it approved the “Acacias 6801 TC Relocation” SOW and determined it necessary to comply with applicable federal requirements, including FEMA’s Section 406 Public Assistance program, relevant environmental and historical preservation mandates, and Puerto Rico’s regulatory framework. Further, the Energy Bureau ordered LUMA to submit a copy of the approval by COR3 and/or FEMA for the projects, including the costs obligated for each project, within ten (10) days of receiving such approval. *See* October 18<sup>th</sup> Order, p. 2.

4. LUMA has since identified the need to submit a revised submission of the “Acacias 6801 TC Relocation” SOW (which maintains the same name “Acacias 6801 TC Relocation”). Pursuant to the above, LUMA hereby submits, as *Exhibit 1* to this Motion, the “Acacias 6801 TC Relocation” SOW.

LUMA respectfully requests that the Energy Bureau replace the previously approved SOW, as detailed in this Motion, and substitute it with the Amended SOW, submitted as *Exhibit 1* to this Motion. LUMA also requests that this Energy Bureau approve the Amended SOW submitted with this Motion, to wit, the “Acacias 6801 TC Relocation” SOW.

## **II. Request for Confidentiality and Supporting Memorandum of Law**

5. LUMA hereby requests that *Exhibit 1* be maintained confidential. LUMA is submitting a redacted version for public disclosure, and an unredacted non-public version under seal of confidentiality.

6. LUMA submits a Memorandum of Law stating the legal basis for which the unredacted version of *Exhibit 1* should be filed under seal of confidentiality. As will be explained below, the unredacted version of the SOW in *Exhibit 1* should be protected from public disclosure as these documents contain confidential information associated with Critical Energy Infrastructure Information (“CEII”) as defined in federal regulations, 18 C.F.R. §388.113; 6 U.S.C. §§ 671-674, and per the Energy Bureau’s Policy on Management of Confidential Information (the “SOW with CEII”). *See* Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009 (“Policy on Management of Confidential Information”), issued on August 31, 2016, as amended by the Resolution dated September 20, 2016.

7. In addition, the Amended SOW includes personal identifying information of individuals who are LUMA staff or contractors protected under Puerto Rico’s legal framework on privacy emanating from the Puerto Rico Constitution and should also be protected pursuant to the Energy Bureau’s Policy on Management of Confidential Information.

## **III. Memorandum of Law in Support of Request for Confidentiality**

### **A. Applicable Laws and Regulations to Submit Information Confidentially Before the Energy Bureau**

8. The bedrock provision on the management of confidential information filed before this Energy Bureau is Section 6.15 of Act 57-2014, known as the “Puerto Rico Energy Transformation and Relief Act”. It provides, in pertinent part, that: “[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any

confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such [...]” 22 LPRC §1054n (2024). If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.* §1054n(a).

9. Access to confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.* §1054n(b). Finally, Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review.” *Id.* §1054n(c).

10. Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service companies shall provide the information requested by customers, except for confidential information in accordance with the Puerto Rico Rules of Evidence.

11. Moreover, the Energy Bureau’s Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the

Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table identifying the confidential information, a summary of the legal basis for the confidential designation, and an explanation of how each claim or designation conforms to the applicable legal basis for confidentiality. *Id.* at ¶ 3. The party that seeks confidential treatment of information filed with the Energy Bureau must also file both a “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.* at ¶ 6.

12. The Energy Bureau’s Policy on Management of Confidential Information states the following with regard to access to CEII:

Critical Energy Infrastructure Information (“CEII”)

The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties’ authorized representatives only after they have executed and delivered the Nondisclosure Agreement.

Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party’s offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

*Id.* § D (on Access to Validated Confidential Information).

13. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that “a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the

petition and, if it understands [that] the material merits protection, proceed according to [...] Article 6.15 of Act No. 57-2015, as amended.” *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms*, § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

## **B. Discussion in Support of Request for Confidential Treatment**

14. The Amended SOW included in *Exhibit 1* contains portions of CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the Amended SOW with CEII warrants confidential treatment to protect critical infrastructure from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII under seal of confidentiality.<sup>1</sup> In at least two Data Security and Physical Security proceedings,<sup>2</sup> this Energy Bureau, *motu proprio*, has conducted proceedings confidentially, thereby recognizing the need to protect CEII from public disclosure.

15. Similarly, the Energy Bureau has granted LUMA’s requests for confidential treatment of portions of the FEMA approvals submitted for approval in the present case. Notably, the Energy Bureau has granted LUMA’s request for confidential treatment of portions of FEMA

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<sup>1</sup> *See, e.g., In re Review of LUMA’s System Operation Principles*, NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority’s System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA’s Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan*, NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrad Transmission and Distribution Investments*, NEPR-MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII. However, *see* Resolution and Order of February 12, 2021, reversing in part, grant of confidential designation).

<sup>2</sup> *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

Approvals of Projects submitted for consideration and authorization. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

16. As mentioned above, the Energy Bureau’s Policy on Management of Confidential Information provides for the management of CEII. It directs that the parties’ authorized representatives access information validated as CEII only after executing and delivering a Non-Disclosure Agreement.

17. Generally, CEII or critical infrastructure information is exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly 18 C.F.R. § 388.113(c)(2), states that:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
- (iv) Does not simply give the general location of the critical infrastructure.

*Id.*

18. Additionally, “[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, “[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.” *Id.*

19. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”).<sup>3</sup> CII is defined as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems [...]” 6 U.S.C. § 671 (3).<sup>4</sup>

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<sup>3</sup> Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

- (A) shall be exempt from disclosure under the Freedom of Information Act;
- (B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision-making official;
- (C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
- (D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
  - (i) in furtherance of an investigation or the prosecution of a criminal act; or
  - (ii) when disclosure of the information would be--
    - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
    - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office
- (E) shall not, be provided to a State or local government or government agency; of information or records;
  - (i) be made available pursuant to any State or local law requiring disclosure of information or records;
  - (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information;
  - or
  - (iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.
- (F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

<sup>4</sup> CII includes the following types of information:

- (A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;
- (B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or

20. Portions of the Amended SOW included as *Exhibit I* contain CEII that, under relevant federal law and regulations, is protected from public disclosure. LUMA stresses that the unredacted version of the Amended SOW warrants confidential treatment to protect critical infrastructure from threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico. In several proceedings, this Energy Bureau has considered and granted requests by PREPA to submit CEII under seal of confidentiality.<sup>5</sup> In at least two proceedings on Data Security<sup>6</sup> and Physical Security,<sup>7</sup> this Energy Bureau has, *motu proprio*, conducted them confidentially, thereby recognizing the need to protect CEII from public disclosure.

21. The Amended SOW contains a diagram that qualifies as CEII because it contains information on the engineering and design of critical infrastructure, as existing and proposed, relating to the transmission of electricity, which is provided in sufficient detail that could potentially be helpful to a person planning an attack on this or other energy infrastructure facilities interconnected with or served by this facility and equipment. The pages that contain the CEII are identified within the table in Part C of this motion, which summarizes the hallmark requests for

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(C)any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

<sup>5</sup> See e.g., *In re Review of LUMA's System Operation Principles*, NEPR-MI-2021-0001 (Resolution and Order of May 3, 2021); *In re Review of the Puerto Rico Power Authority's System Remediation Plan*, NEPR-MI-2020-0019 (order of April 23, 2021); *In re Review of LUMA's Initial Budgets*, NEPR-MI-2021-0004 (order of April 21, 2021); *In re Implementation of Puerto Rico Electric Power Authority Integrated Resource Plan and Modified Action Plan*, NEPR MI 2020-0012 (Resolution of January 7, 2021, granting partial confidential designation of information submitted by PREPA as CEII); *In re Optimization Proceeding of Minigrad Transmission and Distribution Investments*, NEPR MI 2020-0016 (where PREPA filed documents under seal of confidentiality invoking, among others, that a filing included confidential information and CEII); *In re Review of the Puerto Rico Electric Power Authority Integrated Resource Plan*, CEPR-AP-2018-0001 (Resolution and Order of July 3, 2019 granting confidential designated and request made by PREPA that included trade secrets and CEII) *but see* Resolution and Order of February 12, 2021 reversing in part, grant of confidential designation).

<sup>6</sup> *In re Review of the Puerto Rico Electric Power Authority Data Security Plan*, NEPR-MI-2020-0017.

<sup>7</sup> *In re Review of the Puerto Rico Electric Power Authority Physical Security Plan*, NEPR-MI-2020-0018.

confidentiality for the Amended SOW. The information identified as confidential in the table is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that, on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of the Amended SOW with CEII in *Exhibit 1* from disclosure, given the nature and scope of the details included in those portions of the Exhibit.

22. Based on the above, LUMA respectfully submits that portions of the Amended SOW should be designated as CEII. This designation is a reasonable and necessary measure to protect the specific location and other engineering and design information of the energy facilities listed or discussed in *Exhibit 1*. Given the importance of ensuring the safe and efficient operation of the generation assets and the T&D System, LUMA respectfully submits that these materials constitute CEII that should be maintained confidentially to safeguard their integrity and protect them from external threats.

23. In addition, a portion of the Amended SOW contains the name, signature, and role of two LUMA employees and a contractor, respectively, who reviewed the Amended SOW as part of LUMA's internal review and approval of the document. LUMA respectfully requests that information on the names, signatures, and roles of these individuals be maintained confidentially, in light of the fact that these details reveal their employment duties, and that their protection is in the public interest and aligned with Puerto Rico's legal framework on privacy, which protects personal information from disclosure. *See e.g.*, Const. ELA, Art. II, Sections 8 and 10, which protect the right to control personal information and distinctive traits, which applies *ex proprio vigore* and against private parties. *See also, e.g., Vigoreaux v. Quiznos*, 173 DPR 254, 262 (2008); *Bonilla Medina v. P.N.P.*, 140 DPR 294, 310-11 (1996); *Pueblo v. Torres Albertorio*, 115 DPR 128, 133-34 (1984). *See also* Act 122-2019, Article 4(vi) (which provides, as an exception to the

rule on public disclosure, information the disclosure of which could invade the privacy of third parties or affect their fundamental rights). It is respectfully submitted that the redaction of the aforementioned information does not affect the public’s or the Energy Bureau’s review of the Amended SOW nor interfere with processes before this Energy Bureau. Therefore, on balance, the public interest to protect privacy weighs in favor of protecting the relevant portion of the Amended SOW.

**C. Identification of Confidential Information**

24. In compliance with the Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, below, find a table summarizing the hallmarks of this request for confidential treatment.

<b>Document</b>	<b>Name</b>	<b>Pages in which Confidential Information is Found, if applicable</b>	<b>Summary of Legal Basis for Confidentiality Protection, if applicable</b>	<b>Date Filed</b>
Exhibit 1	Acacias 6801 TC Relocation	Page 1	Right to privacy ( <i>see, e.g.,</i> Const. ELA, Art. II, Sections 8 and 10)	June 11, 2026
	Acacias 6801 TC Relocation	Pages 4, 8, and 9	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	June 11, 2026

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **approve** the Amended SOW for the T&D Project submitted as *Exhibit 1* to this Motion; and **grant** the request for confidential treatment of *Exhibit 1*.

**RESPECTFULLY SUBMITTED.**

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to PREPA via Alexis Rivera, [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov), and through its counsel of record, Natalia Zayas Godoy, [nzayas@gmlex.net](mailto:nzayas@gmlex.net), Richard Cruz Franqui, [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net), and Mirelis Valle Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net), to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, [jfr@sbgblaw.com](mailto:jfr@sbgblaw.com), José J. Díaz Alonso, [jdiaz@sbgblaw.com](mailto:jdiaz@sbgblaw.com), Stephen Romero Valle, [sromero@sbgblaw.com](mailto:sromero@sbgblaw.com), and Francisco Santos, [francisco-santos@genera-pr.com](mailto:francisco-santos@genera-pr.com).

In Guaynabo, Puerto Rico, on this 11<sup>th</sup> day of June 2026.




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Exhibit 1

*(public version, confidential version to be filed under seal of confidentiality)*

	<b>Document Title: Acacias 6801 TC Relocation FEMA Project Scope of Work (Amended SOW)</b>	Project ID: [10115]
		DR-4339-PR Public Assistance

## FEMA Project Scope of Work (Amended SOW)

Project Name:  
**Acacias 6801 TC Relocation**  
Revision: 2

### APPROVALS


The signatures below formally approve the FEMA Project Scope of Work.

Program Brief Management Leadership (PBML)		
Program Brief Owner	Signature	Date
[REDACTED]	[REDACTED]	06/11/2026
Grants Manager	Signature	Date
[REDACTED]	[REDACTED]	06/11/2026

### DOCUMENT REVISION HISTORY

This table contains the history of the revisions made to this FEMA Project Scope of Work.

Rev.	Effective Date	Description of Change
0	September 13, 2021	Issue for Use
1	March 20, 2026	Initial Release
2	June 6, 2026	Updated to reflect new FAASSt number, new PBO

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## 1.0 OVERVIEW

<b>Project Name:</b>	Acacias 6801 TC Relocation
<b>Project type:</b>	Restoration to Codes/Standards: Restores the facility(s) to pre-disaster function and to approved
<b>Region:</b>	Mayagüez
<b>Program Brief Owner:</b>	Miguel Irizarry
<b>Damage Number:</b>	921982
<b>Damaged Inventory/Asset Category:</b>	Island Wide Substations
<b>FEMA Project Number:</b>	1066734

## 2.0 INTRODUCTION

The purpose of this document is to present an updated Project Scope of Work (SOW) with Cost estimates, as well as environmental & Historical (EHP) Preservation and 406 hazard mitigation work to be submitted to COR3 and FEMA for projects under DR-4339-PR Public Assistance. The completed document will be reviewed by the Central Office for Recovery, Reconstruction and Resilience for Puerto Rico (COR3) and the Federal Emergency Management Agency (FEMA) to create and version a specific project worksheet and post-fixed-cost estimates to repair, restore, or replace eligible facilities, including Section 406 hazard mitigation for a specific project.


LUMA Energy provides the Operations and Maintenance of the electric service to the entire island of Puerto Rico. Puerto Rico Electric Power Authority (PREPA) is the agency that owns the facilities, sites, and systems identified in this Scope of Work that are eligible as critical services facilities as defined in the Public Assistance Alternative Procedures (PAAP) (Section 428) and Bipartisan Budget Act (BBA) 2018 guidance documents.

This document will be updated with information developed during the initial design and engineering phase through the construction phase. As preliminary architectural and engineering work has not been completed, the type of work designation is considered initial and is based on currently available information. A Detailed Scope of Work will be submitted for continued advancing work.

## 3.0 FACILITIES

### 3.1 Facilities Description

The existing Acacias Transmission Center (TC) switchyard consists of facilities that operate at nominal voltages of 115 kV, 38 kV, 13.2 kV and 4.16 kV.

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It includes four (4) 115 kV circuit breakers:

- o One (1) oil circuit breaker (OCB)
- o Three (3) gas circuit breakers (GCBs)
- One (1) 115/38 kV 90/120/150 MVA step down transformer
- One (1) 115/13.2 kV, 24/44.8 MVA, for substation 6802 Acacias
- Seven (7) 38 kV circuit breakers
  - o Six (6) OCBs
  - o One (1) GCBs
- One (1) 38/4.16 kV, 7.5/11.3 MVA, step down transformer for substation 6801 Acacias


### 3.2 Facilities List

Name	Number	Voltage (kV)	GPS Location	Construction Year
Acacias TC	6802	15 kV/38 kV	████████████████████	1972

## 4.0 PROJECT SCOPE OF WORK

The purpose of this initial scope of work is to relocate Acacia TC to a new site to comply with § 9.11 of the 44 CFR, (1) There shall be no new construction or substantial improvement in a floodway, and no new construction in a coastal high hazard area, except for:

- (i) A functionally dependent use; or
- (ii) A structure or facility which facilitates an open space use.
- 115 kV infrastructure for SCOPE shall constitute a new ring bus configuration with rearrangement of services.
  - o Add new 115 kV ring bus configuration switchgear (4 circuit breakers)
  - o Install new T1: 115/38 kV, 67/90/112 MVA transformer
  - o Install new T2: 115/38 kV, 67/90/112 MVA transformer
  - o The design and layout drawings shall consider space provision for future plans of switchyard expansion.
- 38 kV infrastructure for SCOPE shall constitute a new breaker-and-a-half bus with fifteen (15) GCBs. Include spare provision for future expansion.
  - o New control enclosure with protection, control, telecommunications and automation equipment for 13.2 kV, 38 kV and 115 kV systems.

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For this project, also enable synchro phasor technology (PMU) in conjunction with the relay replacement scope to reduce event investigation and restoration times. If additional costs are incurred to enable this technology, it will be pursued under FEMA 406.

#### 4.1 Proposed Transmission Infrastructure (From existing location to new location)

- 115 kV infrastructure for SCOPE
  - 115 kV ring bus with four (4) GCBs with services for:
    - Line 39800 to Mayagüez GP
    - Line 37100 to San German TC
  - New T1 115/38 kV, 67/90/112 MVA transformer
  - New T2 115/38 kV, 67/90/112 MVA transformer
  - The design and layout drawings shall consider one space provision for future plans of switchyard expansion.
- 38 kV infrastructure for SCOPE
  - 38 kV new breaker-and-a-half switchyard with fifteen (15) breakers with services for:
    - Line 1600 to Leon Sect.
    - Line 1200 to 4 Hermanos Sect.
    - Line 1200 to San German Sect.
    - Line 1600 to San German Sect.
    - Line 13400 to San German Sect.
    - Line 13500 to San German Sect.
  - New T1 115/38 kV, 67/90/112 MVA transformer
  - New T2 115/38 kV, 67/90/112 MVA transformer
  - Install a new 38/13.2 kV, 20/33.6 MVA at 13.2 kV substation and associated switchgear to replace existing 6802 Acacias TC substation.
  - Install a new 38/13.2 kV, 20/33.6 MVA at 13.2 kV substation and associated switchgear for a new 13.2kV Acacias TC substation.
  - The design and layout drawings shall consider a spare bay for future plans of switchyard expansion.

#### 4.2 Proposed Distribution Infrastructure (From existing location to new location)

- New substation 6802 and new 38/13.2 kV substation:
  - Major equipment requirements for new substation 6802:
    - One (1) 38/13.2 kV transformer with a 20/33.6 MVA capacity, Delta-Wye
    - One (1) 13.2 kV main breaker, 2,000A.
    - One (1) 13.2 kV bus tie breaker, 2,000A.

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- Five (5) 13.2 kV breakers, 1,200 A (4 feeders, 1 Spare)
- Two (2) 13.2/4.16 kV 3 MVA step-down transformers to supply the loads of the 4.16 kV feeders from substation. Design shall include provisions to tie both converters, so that in case one converter fails, the other can supply its load.

Note: these converters are necessary to supply the loads of substation until they can be converted to 13.2 kV. Design shall provide connections to SST & MTU, and mobile.


- Install ION meter and related metering equipment
  - Provide for current measurement for all phases of each distribution feeder
  - Note: The feeders shall be redistributed between the rebuilt 6802 substation and the new 38/13.2 kV substation.
- Major equipment requirements for new 38/13.2 kV substation:
  - 13.2 kV GIS Double bus:
    - One (1) 38/13.2 kV transformer with a 20/33.6 MVA capacity, Autotransformer
    - One (1) 13.2 kV main breaker, 2,000A.
    - Six (6) 13.2 kV breakers, 1,200 A (4 feeders, 2 spare)
    - Two (2) 13.2/4.16 kV 3 MVA step-down transformers to supply the loads of the 4.16 kV feeders from substation. Design shall include provisions to tie both converters, so that in case one converter fails, the other can supply its load.
    - Install ION meter and related metering equipment
    - Provide for current measurement for all phases of each distribution feeder
    - Note: The feeders shall be redistributed between the rebuilt 6802 substation and the new 38/13.2 kV substation.

## 5.0 TYPE OF PROJECT

<b>Choose One (Restoration, Improved or Alternate)</b>
Restoration to Codes/Standards: Restores the facility(s) to pre-disaster function and to approved
This work will follow FEMA (Public Assistance Alternative Procedures (Section 428) Guide for Permanent Work FEMA-4339-DR-PR February 2020).

**Note:** If preliminary A&E work has not been completed, the type of work designation is considered initial and is based on currently available information. The type of work designation may be revised based on the results of the completed preliminary A&E work.

## 6.0 PRELIMINARY ENGINEERING

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**Is architectural and engineering (A&E) funding required to help define the intended scope of work?**

Yes, architectural and engineering funding required to help define the intended scope of work

## 7.0 CODES AND STANDARDS

The following will be referenced when applying specific codes, specifications, and standards to the project design:

1. Consensus-based codes, per FEMA (Public Assistance Alternative Procedures (Section 428) Guide for Permanent Work FEMA-4339-DR-PR February 2020).
2. Industry standards per FEMA Recovery Policy FP-104-009-5, Version 2, Implementing Section 20601 of the 2018 Bipartisan Budget Act (BBA) through the Public Assistance Program.
3. FEMA Recovery Interim Policy FP-104-009-11 Version 2.1, Consensus-Based Codes, Specifications, and Standards for Public Assistance.
4. LUMA's latest Design Criteria Document (DCD) which aggregates the design considerations of the vast majority of the consensus-based codes, specifications, and standards listed in FEMA Recovery Interim Policy 104-009-11 Version 2.1 (December 20, 2019).

### Codes, Specifications, and Standards

Yes, applicable codes and standards will be identified and incorporated into the plans and specifications.


### Industry Standards

Yes: applicable industry standards will be identified and incorporated into the plans and specifications.

## 8.0 COST ESTIMATE

Cost estimates for this work are prepared in conformance with class 5 accuracy, which is between -50% and +100% of the final project cost. The estimate includes and is not limited to materials, construction labor and equipment, engineering, management, and contingencies.

Estimated Budget for Architectural & Engineering Design:	\$3,626,769.75
Estimated Budget for Procurement & Construction:	\$97,304,856.90
<b>Estimated Overall Budget for the Project:</b>	<b>\$116,433,921.67</b>

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## 9.0 406 HAZARD MITIGATION PROPOSAL

### 9.1 406 Mitigation Opportunity Scope of Work

During the preliminary engineering phase, LUMA will develop and propose 406 Hazard Mitigation proposals consistent with the damage. As per FEMA’s request, LUMA will incorporate the T&D lines to substation project relocation as mitigation measures.

### 9.2 406 Mitigation Opportunity Cost Estimate

Estimated Budget for Architectural & Engineering to Design:	\$785,561.52
Estimated Budget for Procurement & Construction:	\$31,538,831.84
<b>Estimated Overall Budget for the Project:</b>	<b>\$35,448,453.40</b>

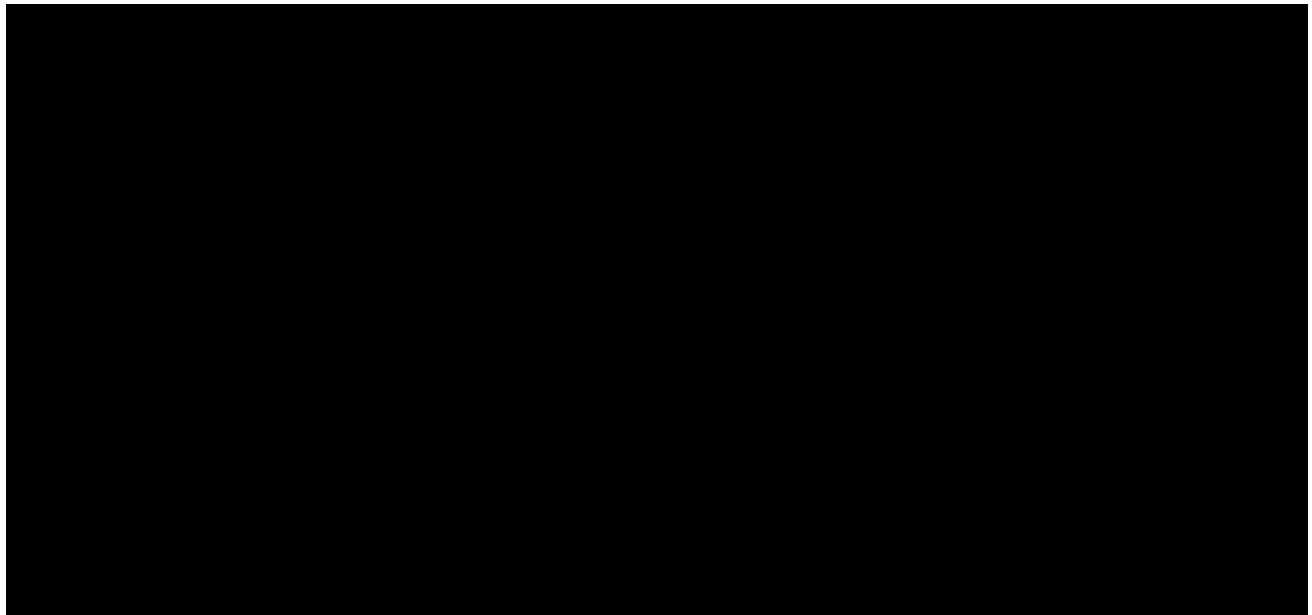
Note: If available, detailed engineering cost estimates will be included as an attachment.

## 10.0 ENVIRONMENTAL & HISTORIC PRESERVATION REQUIREMENTS

EHP considerations will be identified and evaluated during the preliminary design phase and submitted to FEMA for review. Requirements will be incorporated into the final design and construction documents, which must be approved by FEMA prior to construction activities.

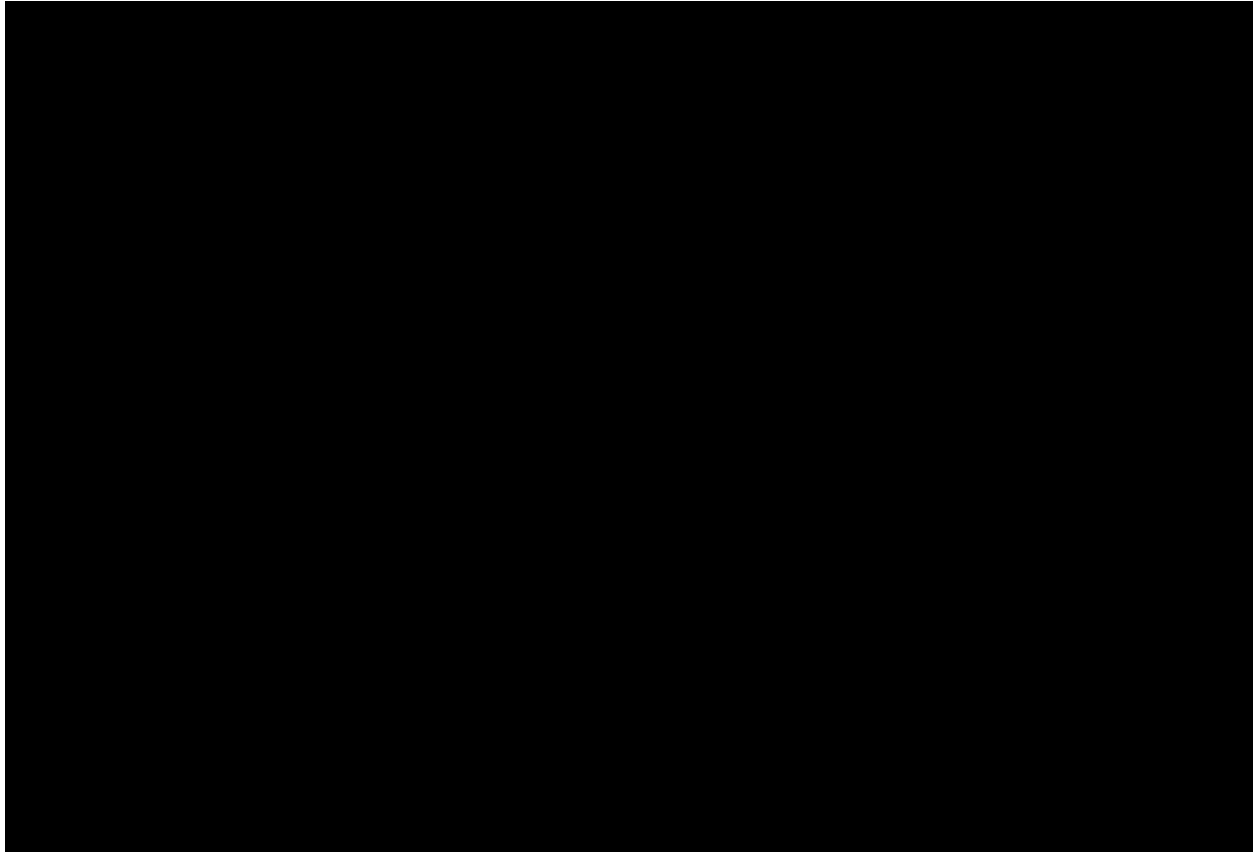
## 11.0 ATTACHMENTS

### Existing Single Line Diagram (SLD)





Proposed Version, Single Line Diagram



Site Map – Proposed Relocation

