

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

NEPR

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

CASE NO.: NEPR-MI-2021-0002

**MOTION TO SUBMIT PREPA'S JUNE 2026 UPDATE TO THE PREPA-LUMA-
GENERA 90-DAY PLAN**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its counsel, and respectfully submits and prays as follows:

1. On March 26, 2021, the Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order (the "March 26 Order") requiring PREPA, among other things, to continue reporting to the Energy Bureau and the Federal Emergency Management Agency ("FEMA") regarding the progress of ongoing efforts related to projects submitted for approval under PREPA's 10-Year Infrastructure Plan.

2. On July 15, 2021, LUMA Energy, LLC and LUMA Energy ServCo, LLC ("LUMA") filed a motion titled Motion Submitting Corrected LUMA Presentation at Technical Conference of July 11, 2021 and Requesting Approvals of Matters Presented and Proposed during the Technical Conference, wherein LUMA proposed that reporting in this docket be performed on a quarterly basis and that updates related to the 10-Year Infrastructure Plan be provided through the submission of the 90-Day Plans prepared for FEMA.

3. On September 21, 2021, PREPA and LUMA jointly filed a Motion Submitting September 2021 Update to PREPA-LUMA 90 Day Plan, informing the Energy Bureau that future updates concerning the implementation of the 10-Year Infrastructure Plan would

be submitted through the PREPA-LUMA 90-Day Plans, consistent with FEMA's reporting requirements.

4. PREPA hereby submits, as Exhibit I to this Motion, the June 2026 Update to the PREPA-LUMA-Genera 90-Day Plan, which provides information regarding the ongoing coordination efforts among PREPA, LUMA, and Genera PR LLC, identifies the principal areas of focus for each entity, and summarizes the key activities and milestones anticipated during the upcoming ninety (90) days in connection with the implementation of PREPA's 10-Year Infrastructure Plan and FEMA-funded projects.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take notice of the foregoing and accept the June 2026 Update to the PREPA-LUMA-Genera 90-Day Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 15th day of June 2026.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login> and notified via email to the attorneys of the parties of record: jfr@sbgblaw.com; Yahaira.delarosa@us.dlapiper.com; jfernandez@ecija.com; eramos@ecija.com.

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FEMA



PREPA-LUMA- Genera 90-Day Plan

June 2026



Puerto Rico Electric
Power Authority

CENTRAL OFFICE FOR RECOVERY,
RECONSTRUCTION AND RESILIENCY
COR3





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I. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document captures an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electrical system.

On June 1, 2021, LUMA assumed overall responsibilities for Puerto Rico Electric Power Authority's (PREPA) Transmission and Distribution (T&D) System as outlined within the Operations and Maintenance Agreement (OMA) between PREPA, Puerto Rico Public-Private Partnership Authority (P3A), and LUMA. Upon execution, PREPA refocused its efforts on projects in the Generation and Dams, Hydro, and Irrigation asset categories; while projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and Environmental asset categories ("T&D Projects") were transitioned to and become the responsibility of LUMA.

On July 1, 2023, GeneraPR assumed overall responsibilities for PREPA's Generation System as outlined within the OMA between PREPA, P3A, and Genera. Upon execution, PREPA refocused its efforts on projects in the Dams, Hydro, and Irrigation asset categories, while projects in the Legacy Generation Asset categories ("Generation Projects") were transitioned to and became the responsibility of GeneraPR.

This 90-Day Plan provides information on areas of coordination among PREPA, LUMA, and Genera, as well as focus areas specific to each.

II. Overview of Focus Areas for the Next 90-Days

The content below summarizes the next steps across the following four areas: 1) Federal Grant Management; 2) Environmental and Historic Preservation (EHP); 3) Engineering Management; and 4) Enterprise Project Management (EPM).

Federal Grant Management

PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3 and FEMA for compliance with EHP requirements.
 - PREPA is working alongside FEMA and COR3 to organize approved detailed SOWs into logical groupings for Project Formulation submissions (*Detailed SOWs*). This includes reconciliation of the Dams Minor Repairs project and others across the portfolio.
 - The logical grouping of the SOWs considers EHP limitations in evaluating all environmental impacts under one area. This topic is discussed in more detail under the EHP Section.
 - PREPA continues to revise *Detailed SOWs* in accordance with FEMA 406-Mitigation and EHP feedback and comments.
 - Comments from written responses and meetings conducted

with FEMA on 406-mitigation are under review and inclusion for detailed DSOW submissions.

- As of December 31, 2025, the end of the last quarter, five (5) projects remain in the applicant resubmission queue and are awaiting additional information from project designers to advance to the next stage:
 - Two projects will remain in the resubmission queue until design information becomes available:
 - Guayabal Dam Repair and Mitigation Project (awaiting Task Order approval and designs), and
 - Guajataca Dam – meetings conducted in June 2026 to address concerns with dam risks, funding challenges, and acquisition strategy recommended by the US Army Corps of Engineers (USACE).
 - Based on the comments received by FEMA EHP, additional studies are required prior to resubmission of the following projects, and PREPA is in the process of acquiring contractors to perform these studies including surveys and geotechnical investigations:
 - Toro Negro Hydroelectric System,
 - Rio Blanco Hydroelectric System, and
 - Caonillas Hydroelectric Plant No. 1
- In addition to the previously listed projects, PREPA anticipates the resubmission of multiple dredging projects. These submissions will incorporate the relevant EHP information. Additionally, these updates will include 406-mitigation designs per FEMA's November 2025 request and may be modified to coincide with the logical regrouping/reconciliation effort. The priorities have been established, as listed below, based on the complexity of the project, technical information available, and cost. Of the projects noted, PREPA anticipates five (5) Dredging Projects DSOWs to be within the FEMA review queue next quarter, with additional resubmissions based on recent RFIs from FEMA staff.
 - Dredging DSOWs: FEMA has determined that 30% design (minimum) must be included in the DSOW submissions. 30% designs have been completed for all eleven (11) dredging projects, however not for the mitigation component. PREPA intends to have the following projects in the FEMA review queue by next quarter:
 - Dos Bocas Reservoir Dredging – with FEMA since Jan 2026
 - Caonillas Reservoir Dredging – with FEMA since Jan 2026)
 - Guajataca Reservoir Dredging – with FEMA since Feb 2026)
 - Garzas Reservoir Dredging – Under PREPA final review prior to submission to COR3 since June 2026 and submission is anticipated June 2026
 - Guerrero Reservoir Dredging – Under COR3 review since May 2026 – submission by July 2026
 - Dredging DSOWs with Mitigation: PREPA provided mitigation

concept papers for eight of the eleven reservoirs. FEMA provided feedback for the concept papers in February and May of 2026. PREPA is in the process of incorporating mitigation packages with program assistance from the FEMA Hazard mitigation team. As such, DSOWs that include both dredging and mitigation are anticipated at a later date or will be resubmitted to FEMA beginning in December of 2026:

- Dos Bocas Reservoir Dredging – resubmission projected for July 2026
- Caonillas Reservoir Dredging – resubmission projected for July 2026
- Due to delays associated with the initiation of the geotechnical program for the Irrigation Canal, **and modifications to the final designs** PREPA anticipates a final DSOW submission for two submissions for the FEMA FAASt Irrigation Canal Projects for next quarter:
 - Guamani Canal – South Coast Irrigation District (July 2027)
 - Juana Diaz Canal – South Coast Irrigation District (August 2027)
- PREPA will work with FEMA to respond to any outstanding RFIs.
 - This previous quarter PREPA did not receive any additional RFIs
 - Three RFIs remain pending:
 - Toro Negro Hydroelectric Conveyance System
 - Caonillas Hydroelectric Plant No. 1
 - Dams Minor Repairs – response expected by July 2026 pending coordination with FEMA
- Pursuant to communications with FEMA, PREPA will be evaluating and proposing hazard mitigation proposals within the next quarter for the following:
 - Guajataca Dam
- Patillas Dam Seismic Retrofit project status, which includes 404 Mitigation Funding for Phase I (design), and Puerto Rico Department of Housing (PRDOH, or Vivienda) Community Development Block Grant Mitigation (CDBG-MIT) program funds for Phase II (construction):
 - PREPA is awaiting FEMA’s response to their Budget Reallocation Request, which was submitted in the second quarter of 2025.
 - PREPA submitted a subsequent Period of Performance (POP) Time Extension Request through COR3 in May of 2026.
 - On-going bi-weekly coordination meetings are held with the US Bureau of Reclamation (USBR), the project design team, to facilitate progress.
 - USBR submitted the 60% design packet to PREPA in December 2025 and to COR3 in March of 2026; 30% design documents,

including budget and schedule, were submitted in the first quarter of 2025.

- The first set of deliverables for the Conditions of Approval (COA) in May 2026
 - On-going monthly meetings are held with the PRDOH to provide project status updates and coordinate with documentation necessary for the environmental review process.
 - Quarterly Patillas Dam Seismic Retrofit Project Stakeholders Meetings, which began in September 2025.
 - The Patillas Dam Seismic Retrofit Project Comprehensive Work Plan, which is being updated on a quarterly basis, provides project partners and stakeholders current progress and status.
- PREPA will submit progress and financial quarterly reports for the period ending June 30, 2026 on all 428 and 404-obligated projects.

Environmental and Historic Preservation

PREPA Focus Areas

- Resubmission of other 428/406-hazard mitigation plan (HMP) projects are ongoing, with emphasis on submitting Scopes of Work (SOW) to COR3 and FEMA for compliance with EHP requirements.
 - FEMA EHP requested that projects be submitted by operational system to support higher level NEPA review and reduce the number of required environmental documents.
 - PREPA is coordinating with FEMA and COR3 to group approved detailed SOWs logically for Project Formulation.
 - Grouping considers EHP evaluation limits, NEPA requirements, and resource constraints for FEMA and PREPA staff.
 - Recent issues threaten progress toward DSOW submission, including:
 - Designers advised that South Coast Irrigation District segments must be submitted individually due to delays in geotechnical investigation approvals and REC issuance.
 - Operational system groupings can delay entire project sets because NEPA review cannot begin until the most complex project is fully defined.
 - Guajataca Dam work is particularly complex due to storm damage, age, hydraulic fill construction, and karst geology. The current strategy would delay all projects within Isabela Operational District.
 - PREPA has raised concerns regarding how FEMA is defining “systems” for environmental review purposes. If the systems approach is based on PREPA’s operational water systems, inconsistencies arise—for example, FEMA has treated the

Dos Bocas–Caonillas system as a unified system requiring integrated review, while not applying the same standard to the Super Aqueduct, which receives water from Carraízo, Caonillas, and Dos Bocas. Carraízo was reviewed independently without requiring downstream integration. PREPA cautions that applying system logic inconsistently may result in overly broad system definitions that could necessitate large, multi-project environmental reviews and delay obligations.

- PREPA proposes using the Dos Bocas and Caonillas Reservoir Dredging projects as pilot cases for implementing the FEMA EHP process.
- PREPA continues revising detailed SOWs based on FEMA 406 Mitigation and EHP feedback.
- Complete EHP checklist and documentation requirements for all PREPA projects based on information received by project designers.
- Respond to any EHP RFIs. Three current EHP RFIs are pending response from PREPA, including:
 - Toro Negro Hydroelectric System – pending additional studies
 - Caonillas Hydroelectric Plant No. 1 – pending additional studies
 - Dams Minor Repairs – pending follow ups based on nearby proposed projects.
- Alongside our FEMA partners, PREPA anticipates the initiation of the formal EHP reviews (NEPA process) for the following projects:
 - Dos Bocas & Caonillas Dredging (EHP review ongoing jointly)
 - Guajataca & Guerrero Dredging (per FEMA, requires a joint review)
 - Garzas Dredging
- Continue the EHP process for the Patillas Dam Seismic Retrofit Project
 - A draft EA was provided to PRODH/Vivienda as established by the HUD & FEMA Joint Environmental Process Workflow. Vivienda identified additional studies required prior to initiation of the environmental review process. PREPA is coordinating efforts to fulfill those requests.
 - PREPA now manages the role of the Certifying Officer. An MOA was signed in April of 2026.
- In conjunction with the DSOW submission, PREPA is establishing meetings with FEMA EHP to discuss the environmental review process for the dredging program, which considers the removal of over 4 million cubic yards of sediment from eleven reservoirs.

Engineering Management

PREPA Focus Areas

- Due to the complexity of the water assets projects, PREPA requested technical assistance from USACE under an umbrella Memorandum of Agreement (MOA) to provide support with design, project management, and construction management (as needed). MOA Work Order 2 for USACE to provide technical assistance was signed and approved the previous quarter.
 - In accordance with Work Order 2, PREPA has issued eleven task requests for technical support to evaluate designs and provide assistance the PREPA Project Management Office (PMO) in managing projects. USACE comments have been provided for all 30% dredging designs.
 - Additionally, in anticipation of programmatic schedules, PREPA is working with USACE to submit a programmatic scheduling plan. Technical Assistance will be needed by Federal Partners. This work falls under Task 002 and should provide the details requested in FEMA's Consolidated Project Plan List Final Submittal Request submitted September 4, 2025. USACE and PREPA are in the process of providing updates to the schedule per changes requested by the designers prior to formal issuance.

- PREPA is working to formalize three additional Work Orders for support from USACE. These work orders are to assist with the geotechnical studies, surveys, and design of the following projects:
 - Rio Blanco Hydroelectric Project
 - Toro Negro Hydroelectric Project
 - Caonillas Hydroelectric Plant No. 1 Project.

- PREPA continues in communication with the designer, the US Bureau of Reclamation regarding the studies and designs necessary for full project development. Follow ups are conducted biweekly to monthly on the task request submitted by PREPA to the USBR to finalize the studies and designs now that project funding has been conditionally approved.

- Dredging Projects:
 - Two architectural and engineering (A/E) design firms were selected for the dredging projects: CSA and AECOM.
 - Planning Phase technical reports were prepared and submitted by the designers to PREPA detailing the project overviews, considerations, and projected alternatives for nine of eleven dredging projects.
 - As of fourth quarter of 2025, 30% design documents were received for the following dredging projects:
 - Caonillas Reservoir Dredging
 - Guajataca Reservoir Dredging
 - Garzas Reservoir Dredging

- Guerrero Reservoir Dredging
 - Loco Reservoir Dredging
 - Lucchetti Reservoir Dredging
 - Guayo Reservoir Dredging
 - Guayabal Reservoir Dredging
 - Dos Bocas Reservoir Dredging
 - Matrullas Reservoir Dredging
 - Guineo Reservoir Dredging
 - 30% designs recommend land acquisition and property rental to ensure proper execution of the work. PREPA is in the process of evaluating proposed properties prior to continuation of subsequent design studies.
 - Studies commenced in June of 2026 and will continue at a minimum for the next 90 days.
 - Although 30% dredging design packages are completed, PREPA with direct coordination with FEMA is assessing and developing hazard mitigation designs and proposals for the multiple dredging projects. As the mitigation component must be included in the original project submission anticipated delivery dates of full 30% designs (dredging and mitigation) is anticipated at a later date.
- Guajataca Dam Project: given the scope and complexity of the project, specialized skillsets are required, and PREPA management has finalized the evaluation of the contract structure to receive such services from USACE. Technical studies and project design are currently under development.
 - USACE is finalizing their alternatives analysis for proposed solutions.
 - PREPA will coordinate with FEMA on 406-mitigation alternatives based on proposed solution.
 - PREPA continues to advance designs for the Irrigation Canal Systems. Based on the size of the South Coast Irrigation District, the designers will submit 30% design information for this project by segment. Due to delays associated with the approval of geotechnical investigations the project schedules have been adjusted.
 - 100% Designs were received at the end of the fourth quarter of 2025, with revisions in March of 2026 for Guamani Main Canal, which comprises the South Coast Irrigation District. These designs are undergoing revisions.
 - Due to scheduling delays associated with REC approval geotech and survey subcontractors' availability is limited to Q2, Q3, and Q4 of the irrigation canals. As such preliminary designs are at later dates:
 - Juana Diaz Canal prelim designs are anticipated by June 2026
 - Patillas Canal prelim designs are anticipated by August 2026.

- IT/OT Telecoms final designs are ongoing (design-build).
 - The project required an amendment to include additional functionality to the system. These designs are under development and awaiting geotechnical investigations in addition to project amendment approval from FEMA.

- **Dams Early Warning System PW 0012 (404 Mitigation Funding)**
 - The Early Warning System Implementation Project has been organized into eight (8) geological groups, prioritized by criticality to accelerate deployment using an agile implementation approach. The communications assessment identified a fiber optic network as an additional required component to ensure reliable connectivity to remote system locations.
 - Final design, procurement and construction permits have been completed for the EWS Group 6, 3, and 5, as well as for the fiber optic work. All FEMA-authorized non-construction activities for these groups have also been completed.
 - PREPA awaits FEMA's EHP updated Record of Environmental Considerations (REC) and Authorization to Commence Construction for Groups 6, 3, 5 and the Fiber Optic Installation.

- **EWS 90 Day Plan:**
 - Obtain FEMA's environmental clearance and authorization to advance the construction and operational deployment of the Early Warning System for Group 6, 3 and 5 and the fiber optic installation.
 - Continue design, geolocation identification, permits, procurement activities, and demobilization for the remaining implementation groups.
 - Provide documentation to FEMA to obtain authorization to commence activities related to the next priority groups.

Enterprise Project Management (“EPM”)

PREPA Focus Areas

- Continuing to manage project schedules, tasks, budgets, and progress in PREPA's system of recording, MS Project Online.
- PREPA will rely on USACE for a master schedule of the projects associated with Task Order 2, which was issued for the creation and management of a program master projects schedule.
- Continuing to refine project management controls and artifacts aligned with federal requirements.
- Continuing integration of federally funded projects into PREPA's EPM program to allow for project management across the entire portfolio, including non-federally funded projects.

- Refine MS Power BI reporting dashboards and develop standard reporting at the portfolio level.
- Monitor and manage implementation progress through the EPM program.

III. PREPA Estimated Schedule for Submission of *Detailed SOWs*

Over the next 90 days, PREPA will be focused on submitting Water Asset projects *Detailed SOWs* once approved by PREB. The table below shows the current set of projects estimated to have *Detailed SOWs* submitted to COR3 and FEMA in the fourth quarter of 2025, all but three of which are Water Asset projects.

The estimation of project submission timing is based on the best information available to PREPA at the time of this plan update.



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90-Day Plan

JUNE 2026



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INTRODUCTION

This document outlines the progress and outlines the critical next steps for FEMA-funded projects related to Puerto Rico's electrical system, in accordance with FEMA's 90-Day Plan requirement for FAASt projects.

Under the terms of the T&D O&M Agreement, LUMA assumed responsibility for PREPA's transmission and distribution system ("T&D System") on June 1, 2021. Since then, LUMA has overseen all projects involving transmission, distribution, substations, IT/Telecom, buildings, and environmental asset categories were now LUMA's responsibility. PREPA in turn, retained responsibility for projects related to fossil-fueled generation, dams, hydroelectric, and irrigation asset categories.

On January 23, 2023, Genera entered into the LGA O&M Agreement to operate and PREPA's Legacy Generation Assets ("LGA") which include base-load generation plants and combustion turbine peaking units. As of July 1, 2023, Genera formally began acting as PREPA's agent for all pending and future generation projects related to the LGA. PREPA continues to manage projects related to hydroelectric generation, dams, and irrigation systems.

This 90-Day Plan highlights the coordination among PREPA, LUMA, and Genera, with a focus on Genera's areas and upcoming activities.

FOCUS AREAS FOR THE NEXT 90 DAYS

PREPA-LUMA-GENERA Coordination and Alignment

- PREPA, LUMA and Genera leadership continue to participate in regular weekly meetings with COR3 and FEMA to ensure project visibility, coordination and risk mitigation.
- PREPA, LUMA and Genera continue coordination to support successful operations under both the T&D O&M OMA and the LGA O&M OMA.

Federal Grant Management

In the next 90 days, Genera will focus on:

- Advancing LGA project amendments for SOW and cost alignment, along with new project formulation, grant coordination, and supporting documentation to facilitate FEMA and COR3 review, obligation, reimbursement, and compliance. Planned DSOW submissions and formulation priorities are summarized in the “Genera Submission of Detailed SOWs” table.
- Continuing coordination with technical contractors, FEMA, and COR3 to organize approved Scopes of Work (SOWs) into logical Detailed Scope of Work (DSOW) submissions that consider EHP review requirements and project-area impacts.pedro
- Supporting BESS and Peakers grant management activities, including procurement coordination, construction and demolition progress tracking, equipment delivery documentation, schedule-risk monitoring, and alignment with applicable FEMA and COR3 requirements.
- Coordinating with Engineering, Procurement, Regulatory,

and Grants teams to address open items that may affect formulation, environmental review, implementation timelines, or reimbursement readiness.

- Continuing ERI cost-share coordination for applicable LGA projects, including documentation support and disbursement follow-up.
- Submitting required progress and financial quarterly reports for all Section 428 and Section 404 projects to COR3.

Environmental and Historic Preservation Coordination

In the next 90 days, Genera will focus on continuing the coordination during the weekly meetings currently being held between FEMA, COR3 and Genera with the EHP team to facilitate execution and compliance of all the projects in the pipeline.

Engineering Management

In the next 90 days, Genera will focus on the following:

- Advancing BESS construction, demolition, equipment delivery, design coordination, and schedule recovery efforts across the active sites to support continued project execution and grant compliance.
- Supporting Peakers execution-readiness activities, including Costa Sur demolition, GWC procurement, Yabucoa demolition procurement, and EPC procurement for Yabucoa, Daguaao, and Jobos.
- Coordinating with technical contractors and internal teams to address decommissioning, site access, mechanical and electrical support, construction sequencing, and open cost or schedule risks.
- Tracking and elevating key technical, procurement, and

schedule items that may affect project formulation, environmental review, reimbursement, or implementation timelines.

These are the highlights of the RFPs that Genera currently has in progress for the upcoming 90 days:

COMPONENT TYPE	PROCUREMENT PROCESS STAGE						TOTAL
	PENDING PUBLICATION	RFP PUBLISHED	EVALUATION	INTENT TO AWARD	AWARDED	CANCELLED	
BESS / PEAKERS	0	3	0	0	5	1	9
FUEL EFFICIENCY	17	0	0	0	1	0	18
POWER PLANT REPAIRS	21	5	7	1	8	5	47
CRITICAL COMPONENTS	3	0	1	3	29	4	40
LEGACY GENERATION PROJECTS	0	0	0	3	13	0	16
TOTAL	41	8	8	7	56	10	130

Enterprise Project Management (“EPM”)

Over the next 90 days, Genera will focus on the following priorities:

- Advancing LGA projects, including repairs, system improvements, and hazard mitigation measures.
- Managing project schedules, tasks, budgets, and progress through Genera’s system of record.
- Maintaining project controls and documentation aligned with FEMA, COR3, and federal requirements.
- Monitoring progress and elevating key cost, schedule, scope, or compliance risks.

GENERA SUBMISSION OF DETAILED SOWS

The following table provides the status of the Detailed SOWs (DSOW) Genera expects to PREB and FEMA. As they are identified, additional dates will be added in future updates.

Q2 GENERA PR 90-DAY PLAN	PROJECT NAME	PREB SUBMISSION	PREB Approval	COR3/FEMA Submission	COR3/FEMA Approval
	164988- Generation Fleet Project - Reconciliation version 406 HMP- V2	N/A	N/A	July	TBD
	1063798- Vieques and Culebra Generator & BOP- will serve as redundancy mitigation for the loss of service of overhead Transmission Line 5400 from Rio Blanco HP to Daguao TC and in a system approach to the recovery plan for the island feeder and substation, with segments within Vieques Island and Culebra Island that will support	N/A	N/A	Completed	Under Review
	673691- Equipment an Material- Cost Alignment- Generation Fleet (BESS, Peakers), Critical Components. New Project- Vieques & Culebra MicroGrid Generators- V8	Completed	Completed	Completed	Completed
	670036- Design Fire Pump Project- Power Plant fire suspression system repairs.	Completed	Completed	Completed	Under Review
	673691- Equipment an Material- Critical Components & Fuel Efficiency adjustments - V9	N/A	N/A	July	TBD
	817248- Power Plant Repairs & System Restoration- Cost Aligment	N/A	N/A	July	TBD
	948766- Physical Security- Island wide security component repairs	Completed	Completed	Completed	Under Review
	Legacy Generation Assets (LGA) Projects- Cost Aligment (Multiple)	N/A	N/A	July	TBD
	1066799- Gasification, Conversions and Repairs (San Juan, Palo Seco & Cambalache)	Completed	Completed	Completed	Under Review

OBLIGATED PROJECTS CONSTRUCTION PROGRESS

Q2 GENERA PR 90-DAY PLAN	PW #	FEMA ID	Project Title	Percentage of Completion 2026 Q2	Percentage of Completion 2026 Q1	Change from Previous Quarter Plan
	10571	669498	FAASt Aguirre Power Plant Infrastructure Projects 001	81%	81%	0%
	10568	669233	FAASt Aguirre Power Plant 002 Units 1 & 2 Projects	98%	98%	0%
	10622	669815	FAASt Aguirre Power Plant 003 Combined Cycle	85%	82%	3%
	108019	754801	FAASt Repair Unit 9 San Juan Steam Plant	0%	0%	0%
	108108	816612	FAASt Continuous Emission Monitoring Systems (CEMS) (Generation)	0%	0%	0%
	108115	817248	FAASt Power Plant Repairs & System Restoration (Generation)	0%	0%	0%
	10608	667744	FAASt San Juan Power Plant 004 - Auxiliary Infrastructure	100%	100%	0%
	10607	663383	FAASt Cambalache Power Plant Permanent Repair	95%	95%	0%
	10615	662947	FAASt San Juan 001 - Units 5 & 6	90%	89%	1%
	11085	687480	FAASt San Juan Plant 002 - Units 7 & 8	90%	79%	11%
	10702	672950	FAASt Costa Sur Permanent Repairs	59%	58%	1%
	10694	673006	FAASt Costa Sur 002 -Infrastructure projects	85%	75%	10%
	10606	662957	FAASt Palo Seco Steam Plant Unit 3-4	88%	86%	2%
	10609	671481	FAASt Palo Seco Steam Plant Permanent Repairs	95%	90%	5%
	11855	164988	FAASt Generation Fleet Project	5%	5%	0%
108066	767305	FAASt Auxiliary Equipment	15%	10%	5%	

PREPARATION FOR CLOSEOUT

PW #	FEMA ID	Project Title	% of Completion Q2 2026
10608	667744	FAASt San Juan Power Plant 004 - Auxiliary Infrastructure	100%



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90-Day Plan

June 15, 2026



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I. Nomenclature

Acronym	Meaning
A&E	Architecture & Engineering
CDBG-DR	Community Development Block Grant – Disaster Recovery
COR3	Central Office for Recovery, Reconstruction and Resiliency
CRC Net Cost	Cost Recovery Cap Net Cost
CW	Contracted Work
DOE	U.S. Department of Energy
DSOW	Detailed Scope of Work
EHP	Environmental and Historic Preservation
FEMA	Federal Emergency Management Agency
HUD	United States Department of Housing and Urban Development
ISOW	Initial Scope of Work
MCW	Mostly Contracted Work
MSA	Master Services Agreement
MSPW	Mostly Self-Performed Work
OIG	Office of Inspector General
OMA	Operations and Maintenance Agreement
P3A	Puerto Rico Public–Private Partnerships Authority
PR	Puerto Rico
PRDOH	Puerto Rico Department of Housing

Acronym	Meaning
PREB	Puerto Rico Energy Bureau
PREPA	Puerto Rico Electric Power Authority
PSP	Priority Stabilization Plan
PW	Project Worksheet
T&D	Transmission and Distribution
406HM	FEMA Section 406 Hazard Mitigation

SYMBOLS

Symbol	Meaning
%	Percent
\$	U.S. Dollar
Q	Quarter (e.g., Q1 FY2026)
#	Number (e.g., Project #746545)

II. Executive Summary

Since assuming the role of system operator five years ago, LUMA has remained steadfast in our mission to build a brighter, more reliable, resilient, and customer-focused energy future for the 1.5 million customers we’re privileged to serve. Every day, our team takes critical actions to improve grid resiliency and reliability while operating in a fiscally responsible manner.

To achieve real, measurable progress, LUMA has established productive working relationships with the Central Office for Recovery, Reconstruction and Resilience (COR3) and the Federal Emergency Management Agency (FEMA). Additionally, LUMA has been participating in meetings with stakeholders, including PREPA and the Energy Czar aimed at ensuring alignment with Puerto Rico’s energy policy. In line with its plan to continue to

advance critical projects, LUMA has engaged with our grid recovery partners on the following opportunities:

- United States Department of Housing and Urban Development (HUD) and Puerto Rico Department of Housing (PRDOH) Community Development Block Grant Disaster Recovery (CDBG-DR) programs for hazard mitigation, grid resilience, and cost share.
- FEMA Section 406 hazard mitigation (406HM) proposals in all major asset categories and projects.

LUMA remains committed to efficiently executing projects to fundamentally rebuild, transform, and modernize the energy grid following the decades of neglect under the previous operator. As of the third quarter of fiscal year 2026 (Q3 FY2026), LUMA has achieved the following:

- Started or completed construction on 211 FEMA-funded projects.
- Received FEMA obligation for 251 projects.
- Submitted a total of 291 detailed scopes of work (DSOWs) to COR3 and FEMA for obligation.

Received approval from the Puerto Rico Energy Bureau (PREB) for a total of 265 initial scopes of work (ISOWs) submitted for projects and programs.

III. Introduction

In accordance with the directive received from the Federal Emergency Management Agency (FEMA) to produce a 90-Day Plan, this document provides an overview of the key next steps and progress made on FEMA-funded projects for the Puerto Rico electric transmission and distribution grid.

All information in this document is, unless stated otherwise, as of March 31, 2026.

On June 1, 2021, LUMA assumed operation and maintenance responsibilities for the Puerto Rico Electric Power Authority's (PREPA) Transmission and Distribution (T&D) System, as outlined in the Operations and Maintenance Agreement (OMA) between PREPA, the Puerto Rico Public-Private Partnerships Authority (P3A), and LUMA. Upon commencement of the Service Period, projects in the Transmission, Distribution, Substations, IT/Telecom, Buildings, and other categories (T&D Projects) were transitioned to, and are now the responsibility of LUMA, while PREPA and Genera are focused on projects in the Generation, Dams, Hydro, and Irrigation asset categories.

The 90-Day Plan outlines LUMA's key focus areas.

Over the next 90 days, LUMA will focus on revising DSOWs and cost estimates for T&D projects. The tables below, in section VI, display the existing set of projects and those pending obligation by asset category, as included in the tier 1 priority project list.

In addition to the 90 Day Plan, LUMA is complying with updated FEMA guidance on a supplemental detailed report for all projects to satisfy an Office of Inspector General (OIG) recommendation from their September 11, 2025 audit and report.

To address this recommendation, FEMA developed an addendum (Appendix G) to FEMA's Accelerated Award Strategy (FAASt) Standard Operating Procedure (SOP) which requires the completion of a tracker that captures additional data. This document, known as the "Schedule Baseline" worksheet, is required to be updated and submitted to FEMA with the regular 90-day updates. In support of this requirement, LUMA will collaborate directly with COR3 and FEMA in this 90 Day Plan in the requirements first submission.

A. Realignment of Construction Schedules

In each iteration of the 90-Day Plan, LUMA provides updated projections of key milestones, including construction start dates. This plan reflects updates to some construction start dates as project timelines have had to be adjusted to reflect industrywide market limitations, including the timeline required for the procurement of the Capital Programs' portfolio.

Challenges exist with both materials and construction resources. There are supply shortages impacting raw materials, such as electrical steel, and components, such as sensors. Increased demand for other key raw materials like steel, oil, copper, and insulators is adding to the delays.

To mitigate this, LUMA issued new requests for proposals, including a construction Master Services Agreement (MSA), and worked with COR3 and FEMA to version the long-lead materials PW to allow for additional materials to reduce the long-term challenges.

B. Self-performed work

LUMA will continue to execute self-performed work in the following categories:

- Pole/conductor replacements
- Structure replacements
- Hardware/insulator replacements
- Streetlights
- Substation, feeder, and line minor repairs
- Communication network and grid automation
- Equipment replacements
- Civil and low-voltage work to support projects

Self-performed work includes tasks executed by LUMA's internal teams and contractors. Self-performed work is designated as contracted work (CW), mostly contracted work (MCW), or mostly self-performed work (MSPW).

- **MCW** = more than 65% of the work is procured/contracted (excluding management and oversight).
- **MSPW** = more than 65% of the work is performed by LUMA (excluding management and oversight).
- **A mixture of contracted work and LUMA self-performed work (CW/SPW)** = between 50/50% and 65/35% (excluding management and oversight).

C. Asset Categories and Prioritization Approach

To develop this plan, LUMA has over 250 projects in the Master Plan organized by ten (10) asset classes centered on modernizing and strengthening Puerto Rico’s electric transmission and distribution (T&D) system. LUMA’s plan aims to improve reliability, resilience, and sustainability. Here are the key areas of investment:

Figure 1.1 provides the eleven programs used for the 10-Year Long Term Investment Plan

Buildings	Focuses on developing, implementing, and sustaining initiatives to improve and maintain the condition of assets under the responsibility of the Facilities Department.
Distribution Feeder Rebuild	Rebuilds overhead and underground lines to boost reliability and resiliency. Includes restoring circuits, completing unfinished work, upgrading voltage, extending service, and hardening lines for critical customers.
Distribution Streetlighting	The Distribution Streetlighting program upgrades and replaces distribution streetlights.
Distribution Automation	Deploy smart devices like reclosers and fault indicators to reduce outage impacts and improve response times.
Grid Modernization	Advances system resilience, reliability, and flexibility through control, communication, automation, and digital technologies. Supports clean energy adoption, enhances security, and improves system visibility, laying the foundation for Puerto Rico’s future economic growth.
Substation	This program upgrades and reinforces substations to improve grid reliability and security. Includes upgrades to aging infrastructure and enhanced security measures at transmission substations through advanced technology and hardware.
IT/OT Telecommunications	The IT OT Telecom Systems & Network program deploys smart meters and communication systems to enable real-time data and improve grid efficiency. Includes investments in IT/OT telecom networks that support transmission, distribution, and substation operations.

Transmission	Enhances system recovery, resilience, and modernization through transmission line rebuilds, telecom network upgrades, and priority pole replacements.
Transmission Pole Priority Replacement	The Transmission Priority Pole Replacement program includes replacing damaged overhead transmission poles, towers, and associated hardware and conductors.
Vegetation Management and Capital Clearing	The Vegetation Management and Capital Program clears hazardous vegetation in critical areas and maintains rights of way to standard widths.

Cross functional Asset Category Teams, composed of LUMA personnel, key stakeholders, and technical advisors, have been established for each asset category to accomplish the following goals:

- Develop a clear project description
- Prepare a high-level cost estimate
- Identify potential funding sources
- For the purpose of this 90 Day Plan, each project has also been assigned a time horizon based on its projected construction start date:
 - Near-term (2026–2027)
 - Mid-term (2028–2029)
 - Long-term (2030 and beyond)

To ensure consistency and transparency, four standardized major milestones were defined and applied across all projects. The Asset Category Teams estimated the timing of each milestone based on project complexity, readiness, and alignment with strategic priorities.

Four standardized major project milestones were defined and applied to all projects:

1. 30% Architecture & Engineering (A/E) Design Start – Initial design and scoping activities begin.

2. Submission to COR3 and FEMA – Project is formally submitted for review and approval.
3. Construction/Implementation Start – Field execution or construction activities commence.
4. Closeout Activities Begin – Project enters the final phase of documentation, audit, and financial reconciliation with FEMA and COR3.

Projects were assigned to a time horizon—near-term (2026–2027), mid-term (2028–2029), or long-term (2030 and beyond)—based on the expected start date of the commencement of construction work. Each Asset Category Team applied a tailored prioritization approach based on the unique characteristics of their asset class. However, several common evaluation criteria were used across all teams, including:

- System operational needs and existing grid constraints
- Impact on reliability performance and support for critical load infrastructure
- Mitigation of severe storm hazards and climate resilience
- Regulatory or compliance drivers
- Community and customer impact, including equity and accessibility

This structured approach ensures that LUMA's capital investments are strategically sequenced, and risk informed. These investments are aligned with the overarching goal of transforming Puerto Rico's electric grid into a more reliable, resilient, and modern system.

IV. Plan Overview

The content below summarizes the next steps across the following six areas:

1. Federal Grant Management
2. Funding and Reporting
3. Environmental and Historic Preservation
4. Engineering Management
5. PREPA-LUMA Coordination and Alignment
6. Investment Strategy Overview

FINAL

A. Federal Funds Office

LUMA goals for the next 90 days:

- LUMA will continue to work with the P3A, PREB, PREPA, Central Office for Recovery, Reconstruction, and Resiliency (COR3) and Genera to provide its input and particular focus on prioritized T&D investments that leverage available FEMA funding.
- LUMA will continue to work with Genera, PREPA, and the Department of Energy (DOE) to align on approaches to maximize DOE funding to complement FEMA obligated projects and target specific infrastructure to stabilize and harden the system.
- LUMA will continue to work with COR3 and FEMA to obtain obligation for identified Tier 1 priority projects, including vegetation clearing, transformer replacements to stabilize the system, the deployment of grid automation, and priority transmission and distribution repair and reconstruction projects.
- LUMA will continue to work with COR3 and FEMA to align and develop accurate cost estimates for work, including the execution of an island-wide vegetation clearing initiative, through the submission of detailed scopes of work (DSOWs) representing individual lines and grouped projects targeting all Distribution and Transmission vegetation clearing for 38kV, 115kV and 230kV aligned to the revised DOE 202c Directive.
- LUMA will continue to develop and submit DSOWs for priority projects and initiatives to align with its execution strategy and the collaboratively developed priority project list with PREPA and Genera.
- LUMA will continue working with COR3 and FEMA on project and DSOW amendments for 428/406 proposals and work completed amendments.
- LUMA will continue to focus and prioritize the efforts of the Grid Automation program on submitted DSOWs to complete work identified on the LUMA and FEMA priority list with a specific focus on obligation timelines as the projects are staged for construction.
- In the Grid Automation and Streetlighting programs, LUMA will continue to prioritize and work with COR3 and FEMA on the documentation and project

amendments of work completed for streamlining obligation and cost recovery with specific project DSOWs.

- LUMA will work closely with COR3 and FEMA in developing and versioning projects for additional work miles for vegetation clearing to include processes for including Off-ROW hazard mitigation clearing.
- LUMA will continue close collaboration and stakeholder meetings, led by FOMB and DOE, related to program level vegetation clearing discussions and solutions promoting progress for miles cleared at the Distribution and Transmission levels aligned to directives in the DOE 202c order.
- LUMA will focus all Vegetation efforts on the recent obligations for both Transmission and Distribution projects, with focus on both Distribution and Transmission assessments, vendor execution plans and spending forecast to support vegetation clearing ramp up at the program levels.
- LUMA will continue to work closely with COR3 and FEMA on developing a modified submission and obligation strategy for Transmission vegetation clearing to fully support program level funding and execution with focus on DOE 202c lines as specified in the DOE Order.

During the last 90-day period, LUMA completed the following:

- LUMA initiated the Equipment and Materials Project Worksheet (PW) reconciliation process for both obligated and nonobligated projects, to include furthering the progress with the signing of Version 8 of the Equipment and Materials PW.
- LUMA, in collaboration and coordination with COR3 and FEMA, will engage directly to facilitate regular and on-going vegetation “work to be completed” and “work completed” site visits.
- LUMA continues to develop, formulate and obligate Vegetation clearing projects with FEMA on Vegetation 428/406 clearing splits and costs per mile for all Transmission voltages for 38kV, 115kV and 230kV following Independent Expert Panel (IEP) report and its implementation in the Vegetation Program.

- LUMA submitted for review all 115kV and 230kV Transmission lines proposed for vegetation clearing. The projects received partial approval and obligation with collaboration pending with COR3 FEMA on approaches to securing additional miles for obligation to fully support Transmission clearing at the program level.
- LUMA is working directly with DOE and satellite-based imagery and Lidar tools/data to develop an additional miles project versioning process aligned to full funding and execution ramp up for Transmission single line and grouped projects.
- LUMA submitted to PREPA the list of remaining Vegetation projects to be submitted to FEMA in support of completing the program submissions. Projects included 38kV Transmission, DOE single circuit 38kV Lines and Regional Distribution projects for clearing in environmentally sensitive areas. Pending response from PREPA.
- LUMA submitted to FEMA single Distribution feeders proposed for vegetation clearing based on criteria for reliability and risks of damages to the PR Grid.
- LUMA provided COR3 and FEMA with updates about where construction can be accelerated based on the shared list of priority projects that continues to be revised regularly. Sharing this information supports the 90-Day Plan, project formulation, obligation, and moving projects to construction.

B. Funding and Reporting

LUMA goals for the next 90 days:

- LUMA expects to submit several Area Plans to the Puerto Rico Energy Bureau (PREB) for approval aligning both Maria and Fiona asset and facility repairs as a comprehensive recovery strategy.
- LUMA will submit to the PREB the Federal Funding report for Q4 of FY2026.
- LUMA will continue to work closely with the PREB and other stakeholders to comply with the Resolutions and Orders issued on February 5, 2026, and

February 11, 2026, including the reactivation of the projects listed in Attachments A, B and C, as submitted by LUMA on May 14, 2026, and May 22, 2026.

During the last 90-day period, LUMA completed the following:

- LUMA submitted \$852 million in requests for reimbursements to date.
- LUMA submitted the Q3 FY2026 Federal Funding report to the PREB, highlighting LUMA's progress in executing activities related to federally funded T&D projects.
- LUMA submitted to the PREB a project reconciliation timeline and updated cost estimates for the projects listed in the Consolidated Project List, and also submitted for PREB approval an updated Attachment A along with two new attachments (Attachments B and C) identifying the projects proposed for reactivation or initiation.

C. Environmental and Historic Preservation (EHP)

LUMA goals for the next 90 days:

- LUMA will continue discussions with FEMA Environmental & Historical Preservation (EHP), PREPA, and the State Historic Preservation Office (SHPO) regarding reconsideration on the Monacillos' campus historic elements and, as applicable, agree on viable alternatives to mitigate any impacts associated with the Tier 1 priority Primary Control Center Project.
- LUMA will address any conditions for the Vieques and Culebra Master Plan projects with FEMA EHP guidance.
- LUMA will continue environmental field inspections on construction and vegetation projects with FEMA and DOE approved DSOWs. The inspections include assessments of the following:
 - Adherence to requirements for equipment use, vegetation clearing, waste handling, and other activities
 - Employee training in environmental awareness

- Measures being taken to protect endangered and protected species and notification to US Fish and Wildlife Service (USFWS) and Department of Natural and Environmental Resources (DNER) when there is any sighting.
- Ground disturbance management practices
- Compliance with archaeological and/or historic site considerations
- Ensure proper execution of work near bodies of water (buffer zones and/or permits) and consult with US Army Corp of Engineers (USACE) when required.
- Manage waste (e.g., staging, segregation, transportation) and final disposition (landfill, recycling, or reuse).
- On May 14, a meeting was held with leadership from LUMA, PREPA, FEMA, COR3, and DOE, during which all parties agreed that the work identified in the order is exempt from any permits or processes that could delay its execution.

D. Engineering Management

LUMA goals for the next 90 days:

- Design work will continue for 7 Distribution Feeder Rebuild projects included in the FEMA Tier 1 project list (2 feeders previously submitted and obligated to FEMA and 5 Vieques and Culebra feeders). Obligation process for (5) Vieques and Culebra feeders to continue. Versioning including 406 Hazard Mitigation for 1 feeder (6601-03) will be submitted to FEMA for review. Continue issue for bid process for 2 feeders: 1529-15, 1620-02 and start issue for bid process for 3502-02 and 6601-03. LUMA plans to start construction using internal resources for feeder 8101-03 and complete the construction for Feeder 1303-02.
- LUMA is continuing to work on improving distribution system models and ensuring that computer-based models match the physical condition of the grid.

- LUMA's Grid Automation program will continue to deploy single-phase and three-phase reclosers and fuse cutouts to improve overall system reliability by reducing the number of customers impacted by faults on the circuit and shortening restoration times.

During the last 90-day period, LUMA completed the following:

- During this period, the detailed engineering for obligated feeders 1529-15, 1620-02 and 1303-02 was completed. LUMA continued with detailed engineering on 2 distribution circuits, 3502-02 and 6601-03, and the (5) Vieques and Culebra feeders (which are still in the obligation process). Construction for feeder 1303-02 commenced during this period.
- LUMA continued preliminary engineering design work with existing Architectural and Engineering (A&E) firms toward the development of DSOWs.
- LUMA continued engineering on all projects with FEMA-approved DSOWs.

E. PREPA-LUMA Coordination and Alignment

PREPA and LUMA goals for the next 90 days:

- PREPA and LUMA leadership will continue to participate in regular weekly meetings with COR3, FEMA, and Genera to ensure visibility of project progress, coordination and understanding of common matters, and the identification and resolution of risks that involve points of integration between the entities.
- LUMA will continue to coordinate with PREPA and Genera to support successful operations under the T&D OMA.
- LUMA, PREPA, and Genera will continue to collaborate on the Vieques and Culebra Microgrid Projects.
 - LUMA has assumed project lead responsibilities, including the coordination of project handoffs for the design, construction, and post-production phases for the appropriate operational jurisdictions.

- Genera has assumed responsibility for operating the controllable generation, as well as the submission of a project for a generator and its procurement.
- LUMA is engaged with COR3 and P3A to continue collaboration on project construction and operational jurisdiction challenges related to the OMA between LUMA and PREPA.

V. Investment Strategy Overview

The Investment Strategy team plays a critical role in shaping and executing the long-term investment strategy for LUMA, ensuring alignment with our mission to transform Puerto Rico's electric grid.

The team's responsibilities include:

- Development of the Long-Term Investment Plan – Designing a forward-looking, data-driven roadmap that aligns capital investments with strategic grid modernization goals.
- Prioritizing Spend & Balancing the Portfolio – Ensuring optimal allocation of resources across programs and projects to maximize value and impact.
- Financial Analysis – Conducting rigorous financial assessments to support investment decisions and ensure fiscal responsibility.
- Regulatory Support – Providing critical inputs and documentation to support regulatory filings and compliance efforts.
- Execution & Risk Assessment – Evaluating the organization's capacity to deliver on planned investments while identifying risks and opportunities.
- Ad-Hoc Reporting & Insights – Developing tailored reports and dashboards to inform decision-making at all levels of the organization.
- Enterprise Collaboration – Facilitating cross-functional discussions to align priorities, share insights, and foster a unified investment approach across LUMA.

Through these efforts, the Investment Strategy team enables LUMA's leadership to make informed, strategic decisions that accelerate grid transformation, enhance reliability, and deliver long-term value to the people of Puerto Rico.

Figure 1.2 summarizes the five investment focuses areas that were designated and provides illustrative components within each area.

Start Annual Budget Process	Develop Long Term Investment Plan	Review Plan Executability	Leadership Review	Track Performance
<ul style="list-style-type: none"> Develop and implement a comprehensive long term investment plan that is aligned with the company's financial and operational goals with the funding levels provided. 	<ul style="list-style-type: none"> Non-Federal Capital Plan Federally Funded (FEMA) 	<ul style="list-style-type: none"> Federal Funds Obligation Materials Resources & Contracts Risk & Opportunities 	<ul style="list-style-type: none"> Engineering & Asset Management Finance Regulatory 	<ul style="list-style-type: none"> Provide monthly overview of year-to-date and full year forecast Re-prioritize of spend based on performance Highlight risks and opportunities

Table 1.1 – Total Obligated Project Estimated Cost by Asset Category and Funding Source (\$M)

Asset	FEMA 428	FEMA 406	A&E	Total LUMA Expected Cost
Distribution – Feeder Rebuild	\$43	-	\$7	\$50
Distribution – Pole Replacement	\$168	\$15	\$22	\$205
Distribution – Streetlighting	\$614	\$56	\$116	\$786
Grid Automation	\$33	\$1	\$5	\$39
Substation	\$498	\$37	\$51	\$586
Telecommunications	\$419	\$547	\$10	\$976
Transmission	\$276	-	\$28	\$304
Transmission – Pole Replacement	\$9	\$1	\$1	\$11
Vegetation	\$135	\$357	\$2	\$494
Total	\$2,195	\$1,014	\$242	\$3,451

Table 1.2 – FEMA FY26 Monthly Execution by Asset (\$M)

Asset	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Total
Distribution - Feeder Rebuild	\$2.5	\$1.9	\$2.5	(\$0.5)	\$0.2	\$0.1	\$4.2	\$5.6	\$10.8	\$16.4	\$16.4	\$17.4	\$77.5
Distribution - Pole Replacement	\$8.9	\$7	\$10.1	\$2.9	\$6.8	\$8.9	\$6.6	\$5.7	\$5.7	\$2.8	\$2.8	\$2.7	\$70.9
Distribution - Streetlighting	\$10.8	\$15	\$10.1	\$17.4	\$9.5	\$7.1	\$20.9	\$20.9	\$21.9	\$19.9	\$14.2	\$11.3	\$179.0
Grid Automation	\$1.8	\$0.2	\$0.8	\$1.2	\$0.7	\$1.4	\$7.3	\$8.3	\$8.9	\$9.1	\$9.3	\$9.6	\$58.6
Substation	\$3.5	\$8.4	\$14.6	\$7.0	\$9.5	\$4.6	\$10.6	\$11.3	\$11.3	\$13.1	\$11.3	\$11.7	\$116.9
Telecommunications	\$10.4	\$19.1	\$29.2	\$10.8	\$14.4	\$11.1	\$19.5	\$22	\$19.3	\$21.7	\$21.8	\$23.7	\$223.0
Transmission	\$0.4	\$0	\$1.1	\$1.2	\$0.7	\$2.3	\$6.3	\$6.3	\$4.9	\$5.1	\$5.4	\$4.7	\$38.4
Transmission - Pole Replacement	\$0	\$1	\$0.3	\$0.1	(\$0.02)	\$0.05	\$1.3	\$1.2	\$1.6	\$2	\$2.8	\$2.7	\$13.0
Vegetation	\$4.5	\$4.2	\$3.3	\$4.9	\$0.8	\$1.6	\$10.5	\$17	\$19.1	\$19.4	\$20.7	\$20.1	\$126.1
Total	\$42.8	\$56.8	\$72.0	\$45.0	\$42.6	\$37.1	\$87.2	\$98.3	\$103.5	\$109.5	\$104.7	\$103.9	\$903.4

Note: July-December numbers reflect actual financial data as reported to the Puerto Rico Energy Bureau. January-June are budgeted amounts for FY26.

Figure 1.1

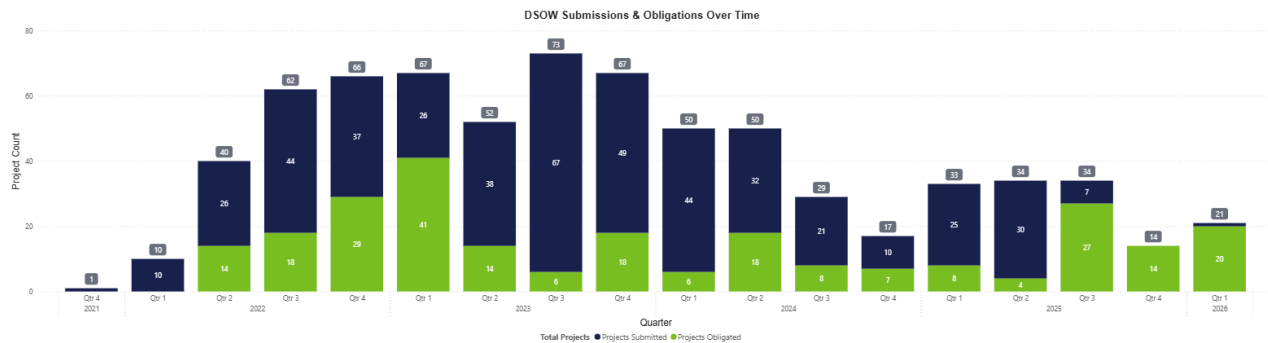
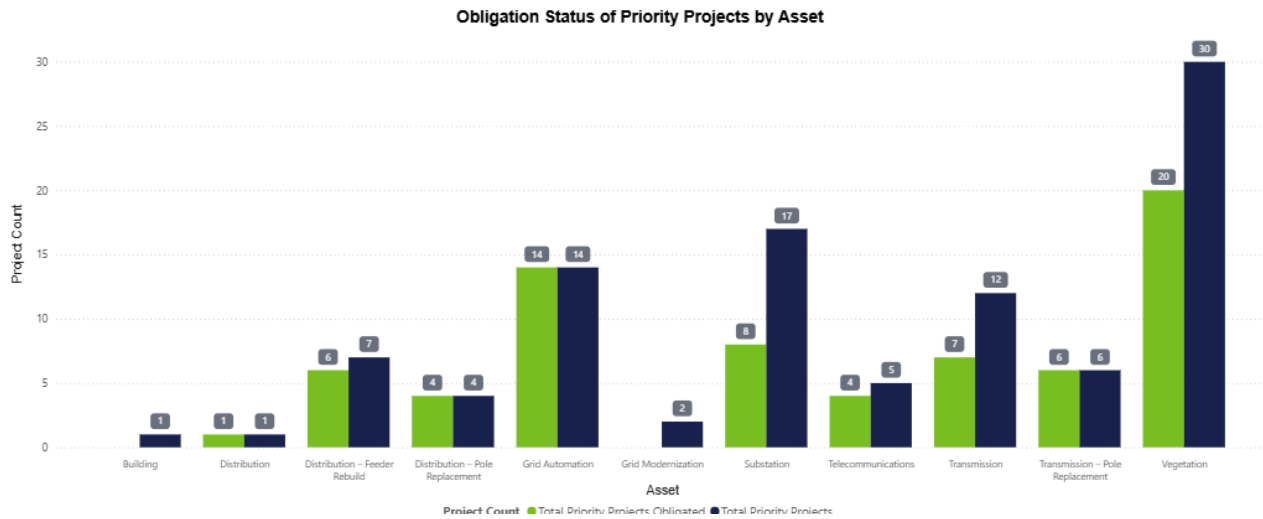


Figure 1.2 – Total Priority Projects

Currently there are 99 projects on the tier 1 priority list, which are divided between the following asset classes.

In the following sections, we list all the projects with their initial DSOW submission dates, revised DSOW submission dates and construction start dates, among several other data points.



VI. Project DSOW Submission and Construction Schedule

To provide clarity and structure around our strategic initiatives, this 90-Day Plan categorizes projects based on their expected time horizon. This approach helps to align priorities, allocate resources effectively, and set realistic expectations for delivery. Each project has been assigned to one of the following timeframes:

- **Near-term (2026–2027):** Projects that are expected to begin construction within the stated timeframe. These are typically high-priority, foundational efforts with immediate impact.
- **Mid-term (2028–2029):** Initiatives that build upon near-term work, often requiring more complex planning, cross-functional coordination, or emerging capabilities.
- **Long-term (2030 and beyond):** Forward-looking projects that align with our long-range vision. These may involve innovation, infrastructure transformation, or initiatives that position us for future success.

Table 1.3 – Number of Priority Projects by Asset Category and Time Horizon (defined by construction start)

Asset Category	Near-Term (2026-2027)	Mid-Term (2028-2029)	Long-Term (2030+)	Total
Buildings	1	0	0	1
Distribution-Feeder Rebuild	1	0	0	1
Grid Modernization	0	2	0	2
Substation	9	0	0	9
Transmission	4	0	0	4
Telecommunications	1	0	0	1
Vegetation	13	0	0	13
Total	29	2	0	31

A. Near-Term Priority Projects Overview & Profile

The near-term priority group includes approximately **29 projects** that are set to commence construction between **2026 and 2027**, pending timely obligation by FEMA. These projects represent a significant portion of the total amount of projects in pipeline and are strategically positioned to deliver early, visible progress on grid transformation. The **estimated cost** for this group is approximately **\$986.2 million**.

Several factors contribute to the concentration of projects in this horizon:

- A strategic push to deliver **tangible results early** in the program.
- A subset of projects have already completed **preliminary engineering** and are ready to advance.
- Some initiatives are **large in scale** and require early initiation to meet long-term completion targets.
- Many projects involve **preparatory work**—such as demolition, environmental remediation, permitting, and right-of-way access—that must be completed before construction begins.

This phase lays the groundwork for broader transformation efforts and reflects LUMA's commitment to accelerating progress where readiness and impact are highest.

Refer to appendix A for a detailed table of the near-term priority projects.

Total Estimated Cost by Asset: Near-Term Projects

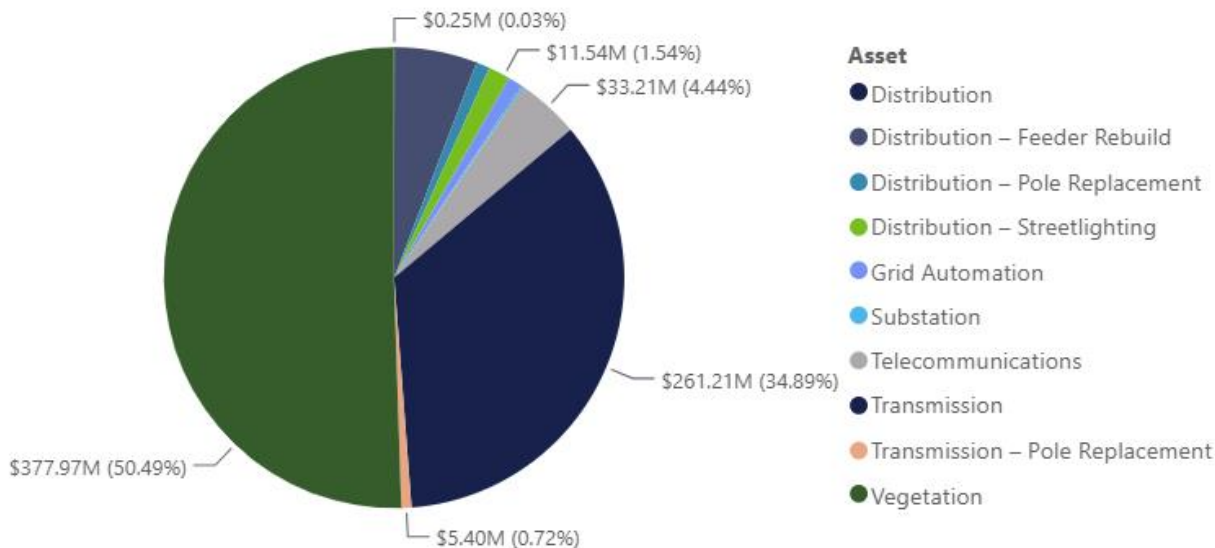


Figure 1.3

Note: Total LUMA Expected Cost (406+428)

Near-Term (2026-2027), Priority Projects

1. Buildings

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the Financial Oversight and Management Board (FOMB) and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
746545*	FAASt [Primary Control Center / Secondary Data Center & Control Room]	Apr-24	N/A	Mar-27	MCW	Pending Obligation

*Note: Primary Control Center DSOW originally submitted under FAASt #657300 in June 2023. FEMA continued EHP review of DSOW during change in FAASt numbers.

2. Distribution – Feeder Rebuild

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
165226	FAASt [Feeders Vieques & Culebra]	Dec-22	N/A	Jan-27	CW/SPW	Pending Obligation

3. Substation

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
169058	FAASt - Llorens Torres MC 1106 - Equipment Repair & Replacement	May-22	Aug-26	May-26	MCW	Pending Obligation
169276	FAASt Substation - Viaducto TC - MC 1100 - Equipment	Mar-23	Aug-26	Dec-27	MCW	Pending Obligation

	Repair & Replacement					
723002	FAASt - EPC - Jobos TC	Jun-23	Sep-26	Aug-27	MCW	Pending Obligation
550106	FAASt [Conquistador CH]	Jun-23	Jun-26	Feb-23	MCW	Pending Obligation
178577	FAASt [Cachete - MC 1526]	Oct-23	Sep-26	Dec-27	MCW	Pending Obligation
682328	FAASt [Bayamón TC - Rebuild]	Nov-23	Jul-26	Oct-24	MCW	Pending Obligation
746660	FAASt [Minor Protection, Automation, and Control [PAC] Replacement]	Apr-24	Jul-26	Aug-26	MSPW	Pending Obligation
551914	FAASt [Caparra 1912 & 1924]	Jun-24	Jun-26	Feb-27	MCW	Pending Obligation
547187	FAASt - [Substation Component Replacement Program]	Mar-25	Jul-26	Jan-27	MCW	Pending Obligation

4. IT & Telecommunications

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
662238	FAASt [Microwave Point-to-Point Backbone]	May-23	N/A	Jun-26	MCW	Pending Obligation

5. Transmission

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
165213	FAASt – Line 5400 – Rio Blanco HP to Daguao TC to Punta Lima TO to Vieques 2501 to Culebra 3801	Nov-22	Oct-26	Feb-27	MCW	Pending Obligation
168483	FAASt - 115kV Line 36400 - Dos Bocas HP to Ponce TC (Transmission)	Aug-22	Sep-26	Nov-27	MCW	Pending Obligation
756997	FAASt [TL 1900 Caguas to Lares TO]	Sep-24	N/A	Nov-27	MCW	Pending Obligation
756999	FAASt [TL 1900 Lares TO to San Sebastian] (Transmission)	Oct-24	N/A	Dec-27	MCW	Pending Obligation

6. Vegetation

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
750063	FAASt [Region 6 -Ponce Group A] Low Density	Nov-24	N/A	Jun-26	MCW	Pending Obligation
956345	FAASt [Arecibo Region 2 Transmission Line 2400 – Dos Bocas HP to Coronillas 2]	Jun-25	N/A	Jun-26	MCW	\$.7M
956348	FAASt [Bayamon Region 3 Transmission Line 10000 – Bayamon Pueblo to Magnolia TO]	Jun-25	N/A	Jun-26	MCW	\$.1M
956357	FAASt [Mayaguez Region 5 Transmission Line 1900 – Dos Bocas HP to San Sebastian TC]	Jun-25	N/A	Jun-26	MCW	Pending Obligation

FEMA Project #	Project Name	Initial DSOB Submission Date	Revised DSOB Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
956343	FAASt [Ponce Region 6 Transmission Line 4800 – Toro Negro to Aibonito, Santa Isabel]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956330	FAASt [Caguas Region 4 - Feeder 3007-03]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956339	FAASt [Caguas Region 4 - Feeder 3301-01]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956337	FAASt [Mayaguez Region 5 Feeder 6012-02]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956331	FAASt [Mayaguez Region 5 Feeder 6014-02]	Jun-25	Jul-26	Jun-26	MCW	Pending Obligation
956340	FAASt [Ponce Region 6 Feeder 5602-02]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956341	FAASt [Ponce Region 6 Feeder 5803-02]	Jun-25	N/A	Jun-26	MCW	\$.09M
956335	FAASt [San Juan Region 1 - Feeder 2301-02]	Jun-25	N/A	Jun-26	MCW	Pending Obligation
956332	FAASt [San Juan Region 1 - Feeder 2401-01]	Jun-25	N/A	Jun-26	MCW	Pending Obligation

B. Mid-Term Priority Projects Overview & Profile

The mid-term horizon includes projects that are expected to begin construction between **2028 and 2029**. These initiatives build on the momentum of the near-term phase and focus on expanding modernization efforts across the grid. Projects in this group are typically more complex or dependent on the completion of near-term work. They may also involve longer lead times for design, permitting, or procurement.

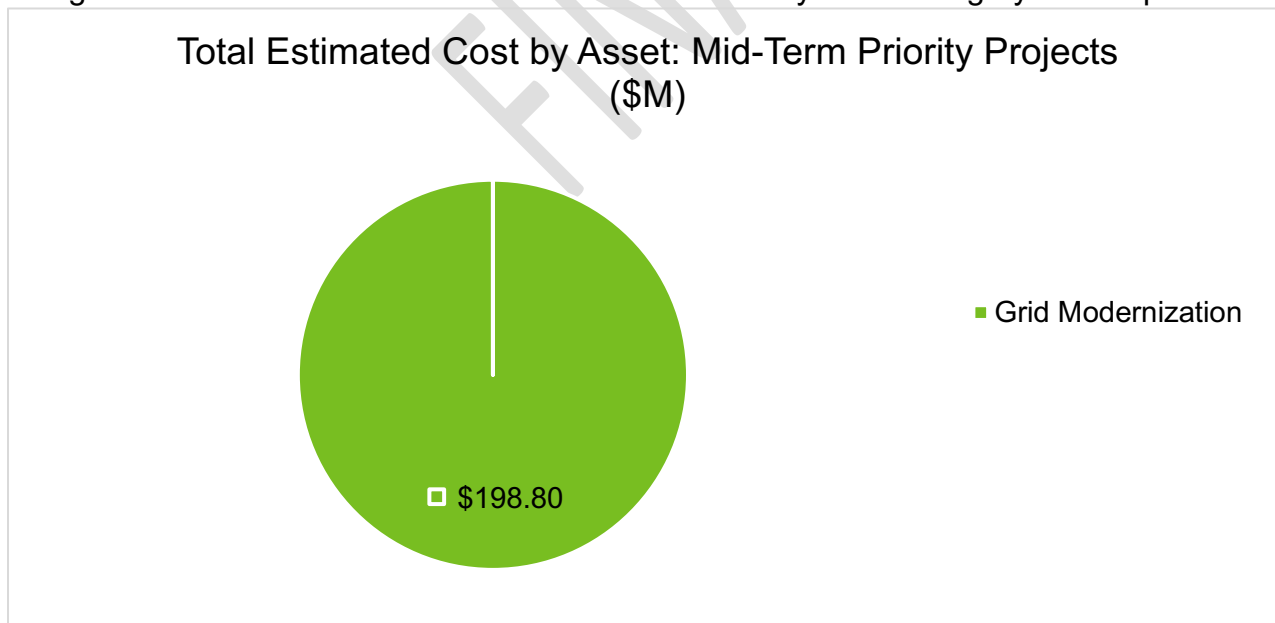
This phase is critical for:

- **Scaling grid automation and resilience** technologies.
- Advancing **regional system upgrades** that require phased implementation.
- Addressing **interdependencies** between asset categories and project sites.

The mid-term group ensures continuity in execution and supports the transition from foundational improvements to more integrated, system-wide enhancements.

- Estimated number of projects: 2
- Estimated in-scope cost: \$198.80 million

Figure 1.4 shows the distribution of estimated costs by asset category for this period.



Note: Total LUMA Expected Cost (406+428)

Mid-Term (2028-2029), Priority Projects

1. Grid Modernization

¹Construction start dates assume timely FEMA obligation of the relevant DSOWs and approval of the underlying contracts by the FOMB and P3A, if required. LUMA will be ready to proceed with construction or as soon thereafter as necessary supplies are available.

²The obligated amount represents the CRC net cost. A&E is not included in this amount.

³The revised DSOW submission date includes dates for amendments and revisions. These dates are contingent on timely COR3 revision to submit to FEMA. Projects with N/A do not have a set date for revision or will not require a revised DSOW as of submission of this report.

FEMA Project #	Project Name	Initial DSOW Submission Date	Revised DSOW Submission Date ³	Construction Start Date ¹	Self-Performed Work	Obligation Amount ²
751656	FAASt [Culebra Microgrid]	Jul-24	Dec-26	Jul-29	MCW	Pending Obligation
751655	FAASt [Vieques Microgrid]	Jul-24	Dec-26	Jul-29	MCW	Pending Obligation

C. Long-Term Priority Projects Overview & Profile

The long-term horizon includes projects that are expected to begin **construction 2030 or later**. These initiatives represent the final phase of the 10-Year Plan and are focused on **transformational infrastructure** that requires extensive planning, coordination, and sequencing.

Projects in this group may be:

- **Highly complex**, involving major transmission corridors or regional system reconfigurations.
- Dependent on **regulatory approvals**, environmental reviews, or multi-agency coordination.
- Designed to support **future energy integration**, including renewables and distributed energy resources.

This phase ensures that LUMA’s long-term vision for a **resilient, modern, and sustainable grid** is fully realized.

- Estimated number of projects: 0

- Estimated in-scope cost: \$0 million

VII. Amendments: 428/406 Priorities and Schedule

In accordance with FEMA's Public Assistance Program requirements, LUMA is working on reconciling funds and amending projects that were initially approved under Section 428 (Fixed Cost Estimate). These efforts focus on identifying portions that qualify for Section 406 mitigation, allowing capped funds to be redirected to other projects. As of June 1st, LUMA has addressed 44 of the group of 48 agreed-upon projects, 11 additional amendments of projects that may need cost adjustments, scope refinement, and/or reconciliation of completed work.

These amendments are essential to support accurate cost recovery, streamline obligation timelines, and maintain alignment with the Tier 1 priority project list. In the following table we detail the pending submissions up until September 30, 2026.

Table 1.4 – Amendments: 428/406 Priorities and Schedule

Month	Num. of Projects Pending to Submit	428 Estimated Reconciliation*	406 Estimated Reconciliation*
June	11	\$210.8M	\$71.2M
July	23	\$554.8M	\$212.3M
August	4	\$334M	\$71.8M
September	8	\$256.1M	\$42.7M
October	1	\$4.7M	\$0.4M
TOTAL	46	\$1.4B	\$402M

Note: *Values are estimates, subject to change

VIII. PREB Reactivation Orders

On February 5, 2026, the PREB issued a Resolution and Order (R&O) in Case No.: NEPR-MI-2021-0002. This order was later modified by the R&O issued on February 11, 2026. Together, these directives require PREPA to reactivate a list of LUMA projects listed in Attachment A.

In compliance with the R&O's, LUMA submitted a revised Attachment A and two new Attachments (Attachment B and C) for PREB approval to advance priority reconstruction efforts by updating the list of eligible Section 428 child projects, reactivating a set of 40 streetlighting projects contingent on required versioning actions, and initiating or reinitiating inactive and incremental projects with incurred costs.

The revised Attachment A updates and refines the PREB list of priority projects focused on reliability, resilience, and modernization needs, while Attachment B enables the redeployment of savings from revised streetlighting scopes to activate additional streetlight projects that enhance community safety. Attachment C supports LUMA's proposed amendment to the Global Equipment & Materials allocation, releasing approximately \$500 million to fund projects requiring activation or reactivation within FEMA's FAAS pipeline and to support federal reimbursement of already incurred eligible costs. Together, these requests ensure alignment with the Updated Allocation Framework, maximize FEMA funding, and minimize financial impacts on ratepayers.

FEMA Project #	Project Name	Asset	DSOW Submission Date	Status as of June 4th
1068667	FAAS [Moca Streetlighting] / Former project 704741 (Distribution)	Distribution	June-26	Activated
1068052	FAAS [Rincon 7301] (Substation)	Substation	July-26	Activated
1068054	FAAS [Santa Isabel] (Substation)	Substation	July-26	Activated
1068056	FAAS Aguadilla Sect. 7003 (Substation)	Substation	July-26	Activated
1068057	FAAS [Quebradillas 7402] (Substation)	Substation	July-26	Activated
1068051	FAAS Hogar Crea (Substation)	Substation	July-26	Activated

FEMA Project #	Project Name	Asset	DSOW Submission Date	Status as of June 4th
1068243	FAASt Isla Grande TC (Substation)	Substation	July-26	Activated
1068662	[Aguas Buenas Streetlighting] / Former project 724941 (Distribution)	Distribution	July-26	Activated
1068665	[Guayanilla Streetlighting] / Former project 724605 (Distribution)	Distribution	July-26	Activated
1068673	[Sabana Grande Streetlighting] / Former project 724599 (Distribution)	Distribution	July-26	Activated
1068664	[Ciales Streetlighting] / Former project 724669 (Distribution)	Distribution	July-26	Activated
1068671	[Quebradillas Streetlighting] / Former project 724716 (Distribution)	Distribution	July-26	Activated
1068666	[Lares Streetlighting] / Former project 713795 (Distribution)	Distribution	July-26	Activated
1068669	[Patillas Streetlighting] / Former project 724670 (Distribution)	Distribution	July-26	Activated
1068670	[Penuelas Streetlighting] / Former project 724781 (Distribution)	Distribution	July-26	Activated

IX. Appendix

- Schedule Baseline Report, as requested by FEMA on May 12, 2026, is now found in the P#136271_DR4339PR_ScheduleAndCompletion Tracker Baseline.