

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

NEPR

Received:

Jul 15, 2026

7:49 PM

IN RE: 10-YEAR PLAN FEDERALLY
FUNDED COMPETITIVE PROCESS

Case No.: NEPR-MI-2022-0005

Motion to Submit Monthly Report on the
Status of Emergency Generation and Black-
Start Generation Procurement in Compliance
with *Resolution and Order* of July 30, 2024

**MOTION TO SUBMIT MONTHLY REPORT ON THE STATUS OF EMERGENCY
GENERATION AND BLACK-START GENERATION PROCUREMENT IN
COMPLIANCE WITH RESOLUTION AND ORDER OF JULY 30, 2024**

TO THE ENERGY BUREAU:

COMES NOW, GENERA PR, LLC (“Genera”), through its undersigned counsel and,
very respectfully, states and prays as follows:

1. On January 23, 2023, the Puerto Rico Energy Bureau (“PREB”) issued a *Resolution and Order* (“January 23 Order”) that conditionally approved PREPA’s RFP process for the procurement of emergency peaker generation systems at Jobos, Dagua, and Palo Seco (“the Projects”), subject to various conditions.

2. On November 8, 2023, the PREB issued another *Resolution and Order* (“November 8 Order”) approving the RFP package submitted by Genera for the procurement of black start and emergency generation services.

3. On February 29, 2024, Genera filed a document titled *Motion to Submit Bi-weekly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with Resolution and Order Dated January 23, 2023* (“February 29 Motion”), in which Genera stated that initial award was scheduled for March 2024.

4. On July 1, 2024, Genera filed a document titled *Motion to Submit Bi-weekly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with Resolution and Order Dated January 23, 2023* (“July 1 Motion”), in which Genera included as Exhibit A the Bi-Weekly report describing the status of the Emergency Generation and Black-Start Generation Procurement. Genera also informed that starting on July 1, 2024, pursuant to Footnote 16 of the January 23 Order, reports would be submitted on a quarterly basis, consistent with the fiscal year’s quarters (*e.g.*, July 1 to September 30 for Q1, October 1 to December 31 for Q2, and so forth), and that their next report was due by October 9, 2024.

5. On July 30, 2024, the PREB issued a *Resolution and Order* (“July 30 Resolution”) in which, in relevant part, denied Genera’s request to submit quarterly reports instead of biweekly reports, and ordered Genera to submit monthly reports beginning on August 15, 2024.

6. It is hereby informed that the execution of the project for peakers installation has been severely impacted by circumstances beyond Genera’s control, as outlined in the attached report, and consequently Genera has been unable to complete the project by the intended date despite all reasonable efforts to expedite its progress.

7. Genera continues to diligently pursue completion of the project at the earliest practicable opportunity. However, progress remains subject to the resolution of several factors that are beyond Genera's control.

8. In compliance with the July 30 Resolution, Genera respectfully submits its monthly report on the status of Emergency Generation and Black-Start Generation Procurement for the month of June 2026, included herein as Exhibit A.

WHEREFORE, Genera respectfully requests that the PREB **take notice** of the above; **accept** Genera’s report on the status of Emergency Generation and Black-Start Generation

Procurement for the month of June 2026, included herein as Exhibit A; and **deem** Genera in compliance with the July 30 Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of July, 2026.

It is hereby certified that this motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case: **Lcda. Mirelis Valle Cancel**, mvalle@gmlex.net; **Lcda. María Teresa Bustelo-García**, mbustelo@gmlex.net.

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Exhibit A – Monthly Report (June 2026)

Emergency Generation and Black-Start Generation Procurement

Docket Number: NEPR-MI-2022-0005
In Re: 10 YEAR PLAN FEDERALLY FUNDED COMPETITIVE PROCESS

Re: Monthly Progress Report – June 2026

In the July 30, 2024, Resolution and Order the Puerto Rico Energy Bureau (PREB) ordered Genera to submit monthly reports on the status of emergency generation and black-start generation procurement, commencing August 15, 2024. Additionally, the Energy Bureau ordered Genera to include, as part of the next and subsequent monthly progress reports, at a minimum, the following:

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a. breakdown of each task, estimated cost, cost amount consumed, and timeline for completion of such task.

Response:

Timelines are detailed in response #1(b). A comprehensive overview of the tasks, along with their estimated costs and the amounts consumed to date, is provided in the following charts:

	Budget	Costs Incurred	Remaining
Equipment Purchase	\$ 513,478,819.97	\$ 428,178,364.76	\$ 85,300,455.21
Site Development & Construction	\$ 452,996,936.67		\$ 427,903,463.17
Project Development		\$ 24,324,040.13	
Permitting		\$ 294,810.68	
Decommissioning & Demolition		\$ 474,622.69	
Construction		\$ -	
Commissioning		\$ -	
Interconnection		\$ -	
	\$ 966,475,756.64	\$ 453,271,838.26	\$ 513,203,918.38

In May 2026, the Equipment Purchase Budget was updated to include an additional \$51,966,742.25 from obligated V8 Equipment Funding. These funds have been incorporated into the budget to support the procurement of electrical infrastructure components, including switchgears, transformers, and Balance of Plant (BOP) equipment. The additional funding ensures adequate financial resources are available for the acquisition of these essential systems, which are required to support overall plant operations,

reliability, and project execution objectives.

Activity	Scope	Costs Incurred
Project Management	Project Development	\$ 3,547,234.98
Design	Project Development	\$ 19,854,386.49
Site Surveys	Project Development	\$ 922,418.66
Permitting	Permitting	\$ 294,810.68
Equipment Purchase	Equipment Purchase	\$ 428,178,364.76
Demolition	Decommissioning and Demolition	\$ 474,622.69
	Total:	\$ 453,271,838.26

Executive Summary

All sites advanced during this period. Costa Sur completed Phase 1 and 2 demolition activities, and LUMA delivered final Facility Studies for Yabucoa, Jobos and Dagua. Costa Sur Facility Study is now pending the final version, incorporating Genera's comments. The critical path remains decommissioning of existing peaker units, which LUMA has conditioned on BESS commissioning at Dagua and Jobos; only Yabucoa has been authorized so far, with its Decommissioning Notice received June 2, 2026, and a Decommissioning Plan due to PREB in July 2026. At Jobos and Dagua, decommissioning remains contingent on completion of the BESS interconnection process at Vega Baja and Cambalache, where construction kick-off meetings with contractors began in June 2026. The 800 MW of temporary emergency generation needed to offset decommissioning remains pending procurement by 3PPO.

Genera expects to receive proposals for the Costa Sur RFP #5228 on August 2026 and proposals for the Engineering, Procurement, and Construction (EPC) RFP #5195 in Jobos, Yabucoa and Dagua in July 2026. Genera also expects proposals for the Yabucoa demolition RFP#5226 in July 2026, with its Notice to

Proceed contingent on Decommissioning Plan approval.

Key open items going forward include the Yabucoa decommissioning approval, the pending land transfer for the Yabucoa site, and completion of the BESS interconnection process to decommission units at Jobos and Dagua.

Progress Overview by Site:

Costa Sur

- Phases 1 and 2 of demolition activities have been completed at the site. Contractor demobilization is expected to be completed in July 2026.
- For RFP #5228, addressing civil, structural and Peakers installation works, the Q&A phase has been completed, and proposals are expected to be received in August 2026.
- In April 2026, Genera received the Costa Sur Facility Study from LUMA Energy and is now awaiting the final version, incorporating Genera's comments and suggestions.
- The revised timeline for the Costa Sur project reflects the time required to complete FEMA approval and the subsequent procurement process. FEMA approval was requested on September 20, 2024, and granted on October 30, 2025. Immediately following approval, procurement of construction contractors began and is still underway, with proposals expected by August 2026. As construction is contingent upon completion of the procurement process, the project schedule has been directly affected by these sequential requirements.

Yabucoa

- The land transfer for the Yabucoa site remains pending, and Genera continues to await LUMA's confirmation of the expected process completion date.
- Genera received the Yabucoa Facility Study final report from LUMA Energy in April 2026. Upon receiving the final Facility Studies, Genera is in the final stages of developing the Scope of Work (SOW) to publish Points of Interconnection (POI) RFP.
- The EPC RFP #5195, covering Peakers installation works for the Jobos, Yabucoa, and Daguaos sites is currently ongoing. Genera expects to receive proposals in July 2026.
- The Yabucoa demolition RFP #5226 is currently ongoing. Genera expects to

receive proposals in July 2026. The Demolition Notice to Proceed, planned for October 2026, is contingent on approval of the Decommissioning Plan.

- The Yabucoa project timeline reflects an extended sequence of regulatory approvals and procurement steps. On January 7, 2025, LUMA required 810 MW of Replacement Capacity before decommissioning could proceed, a condition tied to delays in the 800 MW Emergency Generation Project managed by the 3PPO. Formal conditional approval from LUMA received on January 26, 2026, was contingent on BESS installation, to offset Peakers generation. LUMA authorized disconnection and decommissioning on April 10, 2026. P3A issued the Decommissioning Notice on June 2, 2026, and Genera submitted its Decommissioning Plan on July 2026. Procurement for the demolition and EPC contractors is ongoing, with proposals expected by July 2026. As construction cannot begin until these steps are completed, the timeline has been directly affected by this sequence of approvals and procurement milestones.

Jobos and Daguao

- The EPC RFP #5195, covering Peakers installation works for the Jobos and Daguao sites is currently ongoing. Genera expects to receive proposals in July 2026. Contract approval from the Puerto Rico Public-Private Partnerships Authority (P3A) and the Financial Oversight and Management Board for Puerto Rico (FOMB) is targeted for September 2026.
- Genera received the Jobos and Daguao final Facility Studies in June 2026. Upon receiving the final Facility Studies, Genera is developing the SOW to publish the POI RFP.
- The Jobos and Daguao schedule has been impacted by an extended regulatory approval process and dependency on BESS interconnection at Vega Baja and Cambalache. LUMA concurred with decommissioning of both Jobos 1-1 and Yabucoa 1-1 impaired units in November 2024; however, objected to decommission of Jobos 1-2 and Yabucoa 1-2 operating units. Demolition of Jobos and Yabucoa units 1-1 cannot be started due to the risk this demolition work will represent to Jobos and

Yabucoa units 1-2. In the same way, LUMA objected to decommission of Dagua0 1-1 and 1-2. Decommissioning of operating units was conditioned to have 810 MW of Replacement Capacity added to the electrical grid. Conditional approval was granted in January 2026 to decommission Yabucoa, Jobos & Dagua0, contingent on BESS installation, with LUMA further requiring that batteries at Vega Baja and Cambalache be interconnected first. This interconnection process has its own timeline, including Facility Studies received in late 2025, SOW approval in April 2026, and construction kick-off meetings started in June 2026. As a result, the Jobos and Dagua0 decommissioning timeline remains directly tied to completion of the BESS interconnection process.

Potential Risks

As in every construction work, unforeseen circumstances may affect schedule performance, including global supply-chain constraints, required approvals from applicable authorities, legal disputes, environmental reviews, decommissioning process, and environmental permits. These factors resulted in unanticipated delays. The following is a list of some of such circumstances that have been confronted or may be experienced throughout the entire process.

Potential Risks	
1. Environmental Assessments and Permits	a. Changes in environmental law and environmentally related permits. b. Denial or delays in obtaining necessary environmental permits or approvals. c. Unforeseen environmental contamination requires additional remediation efforts.
2. Regulatory Compliance	a. Denial or delay in obtaining necessary permits or approvals (including, but not limited to, those needed from the T&D System Operator such as units decommissioning concurrence) b. Changes in applicable law or regulatory requirements or additional compliance measures imposed by authorities. c. Changes in regulatory interpretation. d. Changes in regulatory enforcement. e. Extended review periods by regulatory agencies.
3. Site Conditions	a. Need of additional space for any reason, including project development entailing an acquisition process. b. Unforeseen technical difficulties in dismantling equipment or infrastructure. c. Unanticipated structural issues or site conditions that complicate demolition. d. Unforeseen site conditions, whether subsurface or otherwise concealed. f. Changes in the site conditions due to weather or

Potential Risks	
	otherwise.
4. Technical Challenges	a. Unforeseen technical difficulties in decommissioning or dismantling equipment or infrastructure. b. Delays due to the unforeseen need for specialized equipment or expertise. c. LUMA may not accept the use of existing interconnection points for the new Peaker units and may require the development and construction of new interconnection points.
5. Weather and Natural Events	a. Adverse weather conditions (e.g., rain) impacting demolition activities. b. Natural disasters (e.g., earthquakes, floods) causing delays.
6. Contractor and Resource Availability	a. Limited availability or delay in obtaining qualified contractors or specialized personnel for whatever reason. b. Limited availability or delays in delivering necessary equipment, materials, or other supply chain constraints. c. Exceeding capacity limits of approved dumps for disposal of debris. d. Unavailability of labor or subcontractors. e. Proposals received in excess of federal allocated budget f. Global demand increase of generation turbines
7. Health and Safety Concerns	a. Unanticipated health and safety risks requiring additional precautions. b. Implementation of HSE measures by a governmental authority for whatever reasons. c. Incidents or accidents on-site necessitating work stoppages or investigations.

Potential Risks	
8. Stakeholder and Community Engagement	a. Delays due to the need for additional stakeholder consultations or community engagement. b. Public opposition to the project. c. Interference from environmental, community, or social justice organizations. d. Legal challenge seeking to contest the validity of the RFP, the demolition agreement, permits, or other transaction contemplated in the demolition contract.
9. Change Order Risk / Financial Constraints	a. Unexpected cost overruns require additional financial planning and consulting with regulatory agencies to increase budget and funding. b. Change Order risk.
10. Logistical Issues	a. Unforeseen changes concerning the transportation permits and the means of transportation of debris. b. Transportation, logistics, or access issues affecting the movement of materials, equipment, and labor. c. Issues that affect the availability and condition of roads, bridges, or other transportation infrastructure required to mobilize equipment, materials, and labor in and out of the site. d. Coordination challenges with other ongoing projects or site activities.
11. Contractor Delays	a. Failure of contractors and their subcontractors to execute tasks within the timeframes established in their contracts or subcontracts (including delivery times.¹). b. Delays caused by the contractor and subcontractor's performance issues.

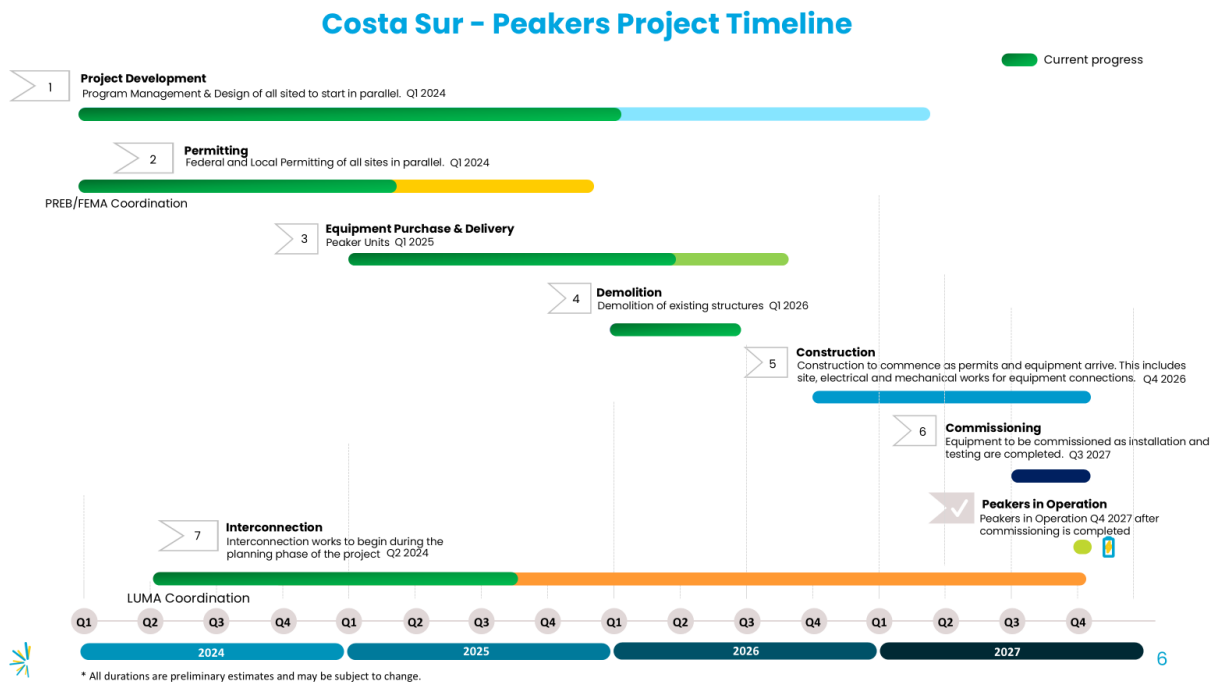
¹ These could range from, but are not limited to, delays in delivery time, defective or non-conforming equipment, and incomplete documentation. Supply chain issues and customs or import delays also fall under the seller's responsibility. Quality control failures, lack of necessary parts or components, and incorrect specifications can cause significant setbacks. Warranty issues, delays in technical support, and non-compliance with regulatory standards add to the seller's accountability. Packaging and shipping issues, inadequate training or installation support, and intellectual property disputes further complicate project timelines. Additionally, any delays in custom modifications to the equipment requested by the buyer are the seller's responsibility. All other conditions listed in the purchase agreements.

Potential Risks	
12. Labor-Related Issues:	a. Delays due to labor strikes, work stoppages, or other union-related actions. b. Negotiation challenges with unions affecting the availability of labor or the timeline for project execution. c. Delays due to reduced productivity caused by labor disharmony.

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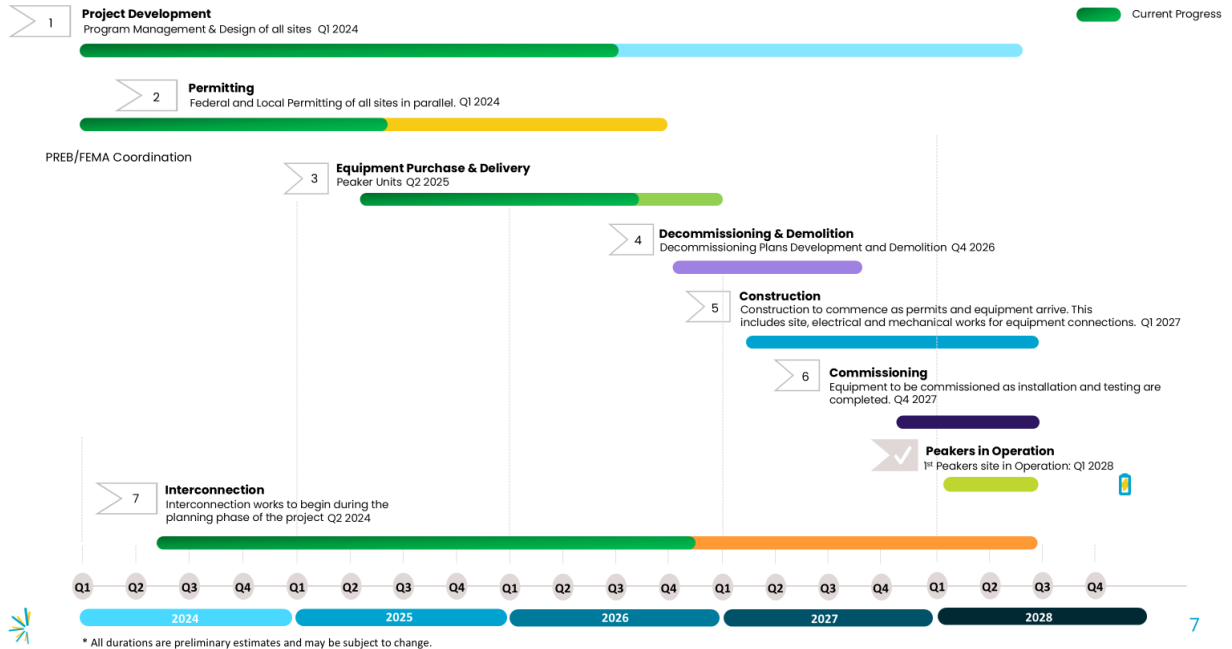
b. The stages of each task, timeline, present status, and estimated time for completion.

Response:



Note: Construction (item 5), Commissioning (item 6), and Interconnection (item 7) are subject to completion of procurement process, which started in October 2025 after receiving approval of FEMA funding. Detailed durations of construction and commissioning processes can be seen in chart “Costa Sur: Peakers Project Duration” below. FEMA approval was required in order to be able to make the mandatory funding certifications for procurement processes.

Jobs, Yabucoa & Dagua - Peakers Project Timeline



Note: Construction (item 5), Commissioning (item 6), and Interconnection (item 7) are subject to completion and approval of Decommissioning Plans. Detailed durations of construction and commissioning processes can be seen in chart “Jobs, Yabucoa & Dagua: Peakers Project Duration” below.

Key Factors Impacting Schedule:

- a. This project was submitted to FEMA on September 20, 2024. After FEMA began evaluating the Project, multiple RFIs were received, especially from environmental teams. Extensive negotiations with FEMA EHP were held to avoid triggering a higher-level NEPA review, which would have potentially delayed the project for over a year. After 13 months, the project received approval from FEMA on October 30, 2025.
- b. LUMA has not authorized the decommissioning of all existing peaker units (except Yabucoa). LUMA opposed Genera's decommissioning plan and requested all MW capacity substitutions along with a Replacement Capacity of 810MW in order to concur with the decommissioning request. Genera had anticipated that the 800MW emergency generation project would be implemented but is still pending procurement by 3PPO. The new peaking units cannot be installed without first removing the existing units in Yabucoa, Dagua and Jobos, since they will be installed in the same footprint. Genera received formal conditioned concurrence letter from LUMA on January 26, 2026. However, as part of the conditions, Genera must place at least 76MW of BESS into service before beginning decommissioning of the existing peaker units. Only Yabucoa units were authorized to be decommissioned. The Decommissioning Notice was received from P3A in June 2026. Genera will submit the Decommissioning Plan in early July 2026.
- c. The Impact Study and Facility Studies for Costa Sur and Yabucoa were completed by LUMA in April 2026. LUMA completed the Facility Studies for Dagua and Jobos in June 2026. These were needed before agreeing to the use of the existing interconnection points. These delays in completing the Facility Studies affected the project execution by 9-18 months from the proposed timeline presented by Genera.
- d. Costa Sur project Federal Funds Approval and Procurement Timeline:
 - i. The project was submitted to FEMA for approval on September 20, 2024.

- ii. FEMA funds approval was granted on October 30, 2025. FEMA approval was required in order to be able to make the mandatory funding certifications for procurement processes.
- iii. Procurement for construction contractors initiated immediately upon funding approval on October 30, 2025; procurement process remains ongoing, with proposals expected by August 2026.
- iv. Following the completion of procurement, the construction start date will be affected by the duration of the P3A and FOMB approval process.

e. Yabucoa Decommissioning and Regulatory Approval Timeline

- i. Retirement process formally initiated by Genera on August 23, 2024, under Article 16 of the LGA-OMA, followed by submission of a Decommissioning Plan (October 11, 2024) and an updated timeline (October 23, 2024).
- ii. On November 4, 2024, LUMA concurred with the retirement and decommissioning plan for Yabucoa 1-1. However, LUMA objected the retirement of Yabucoa 1-2; Genera responded to LUMA's objections on December 10, 2024.
- iii. On January 7, 2025, LUMA reaffirmed its position, conditioning decommissioning on the addition of 810 MW of Replacement Capacity to the grid.
- iv. Delays in the 800 MW Emergency Generation Project, managed by 3PPO, led Genera to submit a revised Unit Retirement Timeline strategy on September 19, 2025.
- v. LUMA granted conditional approval to decommission equipment on January 26, 2026, pending BESS installation.
- vi. PREPA sent a follow-up request to LUMA for disconnection and decommissioning of Yabucoa units on March 23, 2026, following Genera's request on March 20, 2026.
- vii. LUMA authorized disconnection and decommissioning of Yabucoa Units on April 10, 2026.

- viii. P3A issued the Decommissioning Notice for Yabucoa Units on June 2, 2026; Genera submitted the Decommissioning Plan in July 2026.
- ix. Procurement for both the Demolition and EPC contractors is ongoing, with proposals expected by July 2026.

e. Regulatory Approval and BESS Interconnection Process for Jobos and Daguaos:

- i. Retirement process formally initiated by Genera on August 23, 2024, under Article 16 of the LGA-OMA, followed by submission of a Decommissioning Plan (October 11, 2024) and an updated timeline (October 23, 2024).
- ii. On November 4, 2024, LUMA concurred with the retirement and decommissioning plan for Jobos 1-1. However, LUMA objected to the retirement of Daguaos 1-1 and 1-2, and Jobos 1-2 units.
- iii. On January 7, 2025, LUMA reaffirmed its position, conditioning decommissioning on the addition of 810 MW of Replacement Capacity to the grid.
- iv. Delays in the 800 MW Emergency Generation Project, managed by 3PPO, led Genera to submit a revised Unit Retirement Timeline strategy on September 19, 2025.
- v. LUMA granted conditional approval to decommission equipment on January 26, 2026, pending BESS installation. LUMA has further required that batteries at Vega Baja and Cambalache be interconnected before Jobos and Daguaos units can be decommissioned. Below a timeline with the status of the interconnection timeline for Vega Baja and Cambalache:
 - a. Facility Studies prepared by LUMA for Cambalache was received on September 10, 2025 and for Vega Baja on November 14, 2025.
 - b. The Final Scope of Work for both sites were approved and shared with LUMA on April 22, 2026.
 - c. The First Schedule Workshop with LUMA was held on May 20, 2026, to define the POI schedule and process.

- d. The construction contractor kick-off meeting was held for Cambalache on June 23, 2026 and the kick-off meeting for Vega Baja is scheduled for July 2026.

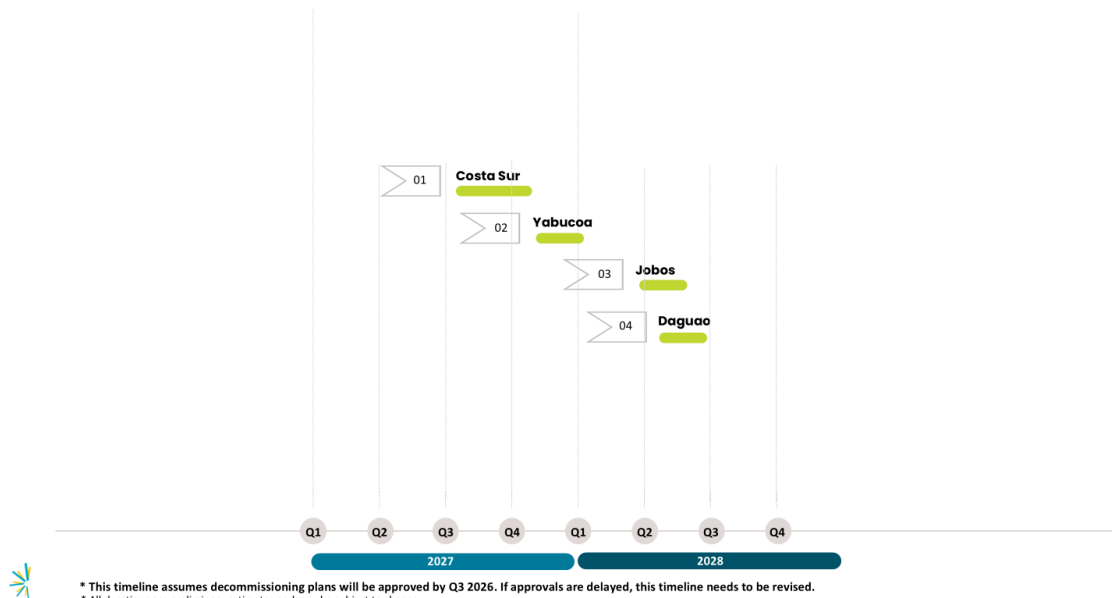
GPR-PREB- NEPRMI20220005 -20240730 #1(c)

d. Project timeline chart (e.g. Gantt Chart) with critical path for the Commercial Operation Date ("COD") of the project.

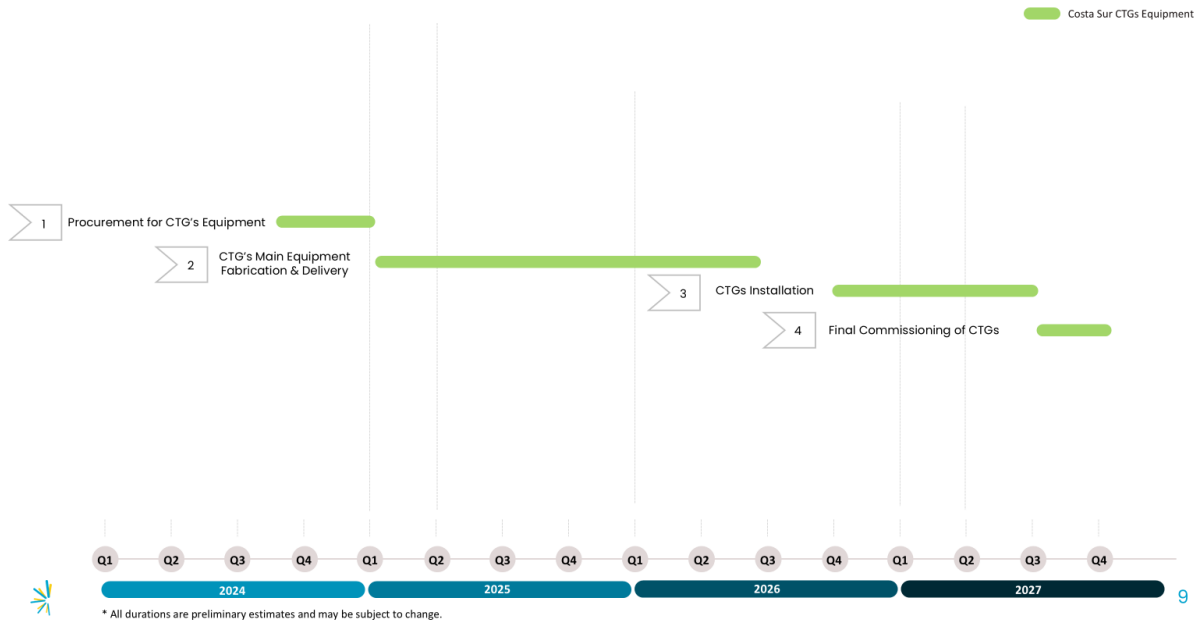
Response:

Consistent with widely recognized construction industry practice, projected schedules are inherently dependent on predecessor activities and regulatory or operational milestones, many of which fall outside the owner's direct control, and, as such, all projected timelines must be adjusted as necessary to reflect delays arising from these external dependencies.

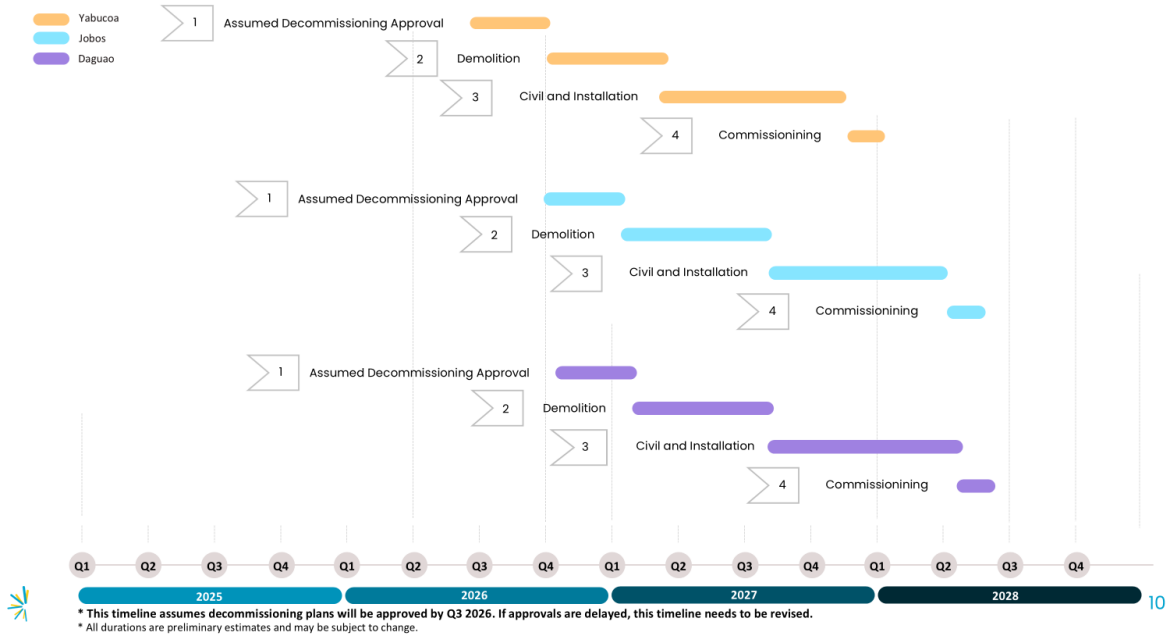
Peakers: Commissioning Timeline



Peakers – Critical Path Timeline: Costa Sur

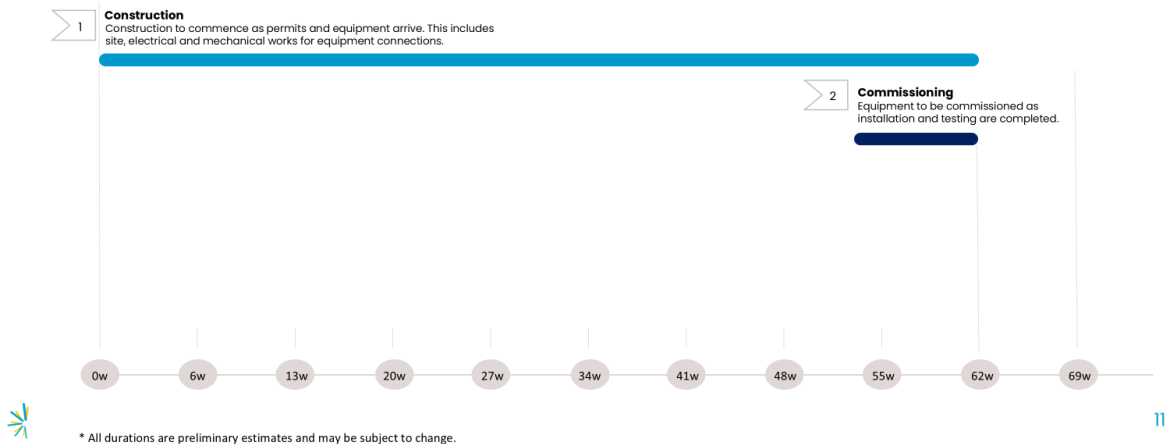


Peakers – Critical Path Timeline: Jobos, Yabucoa & Daguao



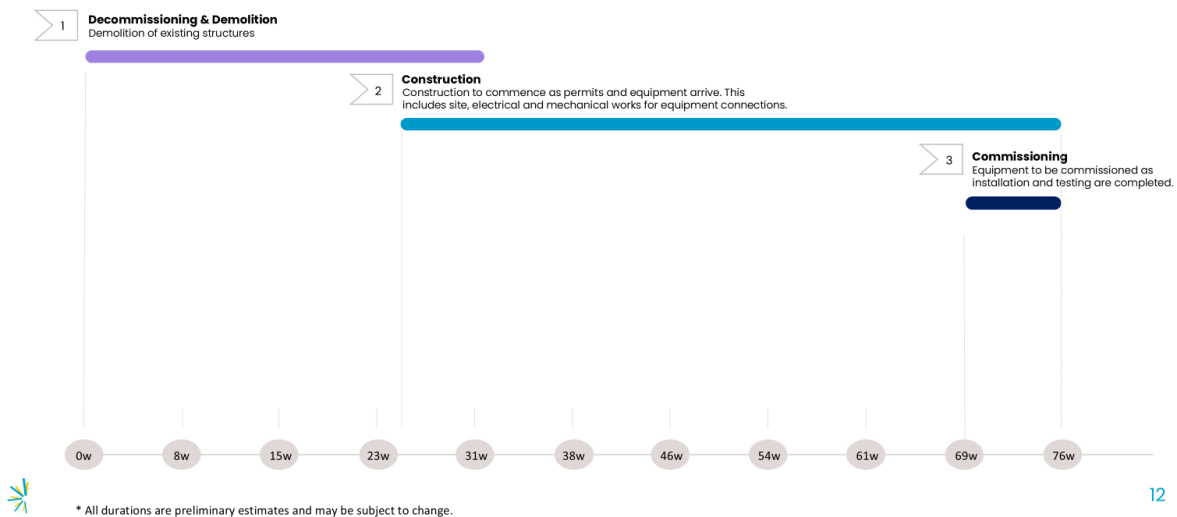
Costa Sur – Peakers Project Duration*

(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



Jobs, Yabucoa & Dagua – Peakers Project Duration*

(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



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e. Permit list, permits obtained, estimated timeline for each permit and status of such permit.

Response:

NEPA Permit Status²

Permit	Applicable Sites	Status	Approval
EHP NEPA Review (Record of Environmental Consideration expected)	All Peaker projects	DSOW submitted 09/18/2024.	09/25/2025
Coastal Zone Consistency Certification	Costa Sur	Peakers expected to be covered under FEMA and PRPB's existing blanket Coastal Certification (in effect until 2028)	Covered under FEMA's blanket Coastal Certification.
Biological Resources Endangered Species Act (IESA)	All Peaker projects	Information submitted with DSOW.	09/25/2025
National Historic Preservation Act Consultation	All Peaker projects	Archeological reports submitted with DSOW.	09/25/2025

Federal Permits Status – Yabucoa, Dagua and Jobos³

Permit	Applicable Sites	Status	Submittal Date	Estimated Approval
Non-PSD Applicability Determination	Yabucoa, Dagua and Jobos	Application submitted to EPA for Dagua/Yabucoa/Jobos.	Amended on 11/12/2025. RFI's received on 12/05/2025 and 12/08/2025	Approved in March 2026.
NPDES Construction General Permit (CGP) for Storm Water	Yabucoa, Dagua and Jobos	Will be filed by Contractor, if applicable.	TBD	TBD
Determination of No Hazard to Air Navigation (FAA)	Yabucoa, Dagua and Jobos	Information submitted with DSOWC	TBD	TBD

² All dates are preliminary estimates and are subject to change.

³ All dates are preliminary estimates and are subject to change.

Federal Permits Status – Costa Sur⁴

Permit	Status	Submittal Date	Approval
Non-PSD Applicability Determination	Application submitted to EPA.	11/26/2025	05/11/2026
NPDES Construction General Permit (CGP) for Storm Water	Will be filed by Contractor, if applicable.	TBD	TBD
Determination of No Hazard to Air Navigation (FAA)	Information submitted with DSOWC	TBD	TBD

Local Permits Status – Yabucoa, Dagua and Jobos⁵

Permit	Status	Submittal	Estimated Approval
DNER Rule 141 – Environmental Impact Document Documentation	Submitted on Oct. 18, 2024.	10/18/2024	All sites have been approved.
PRCF Fire Review (<i>optional</i>)	Genera will file upon receiving final design plans.	2026	60 days after submission
Permiso Unico Incidental (PUI)	Contractor will file.	TBD	30 days after submission
DNER Asbestos/Lead Removal	Contractor will file.	TBD	30 days after submission
Air Emissions Permit (PFE) for Construction	Genera will file during July 2026	July 2026	Q4 2026
Air Emissions Permit (PFE) for Operation	Genera will file after receiving PFE for Construction approval and completing installation of emission sources.	TBD	Q4 2026

⁴ All dates are preliminary estimates and are subject to change.

⁵ All dates are preliminary estimates and are subject to change.

Local Permits Status – Costa Sur ⁶

Permit	Status	Estimated Submittal Date	Estimated Approval
DNER Rule 141 – Environmental Impact Documentation	Approved	July 2025	10/16/2025
PRCF Fire Review	Genera will file upon receiving final design plans.	TBD	60 days after submission
Permiso Unico Incidental (PUI)	Contractor will file.	TBD	30 days after submission
DNER Asbestos/Lead Removal	Submitted on February 9, 2026	02/09/2026	30 days after submission
Air Emissions Permit (PFE) for Construction	Genera will file during July 2026	July 2026	Q4 2026
Air Emissions Permit (PFE) for Operation	Genera will file after receiving PFE for Construction approval and completing installation of emission sources.	TBD	TBD

⁶ All dates are preliminary estimates and are subject to change.

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f. Tasks required in preparation for each site where the project shall be installed. Details on any demolition and permits required in preparation for the installation of the project.

Response:

See responses to questions a through d.

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g. Permit and cost for each site to accommodate the project.

Response:

NEPA Permit Costs⁷

Permit	Applicable Sites	Estimated Cost
EHP/NEPA Review	All Peaker sites	\$150,000 for all sites. Includes EHP Review coordination
Coastal Zone Consistency Certification	San Juan; Costa Sur	\$8,000/site
Biological Resources Endangered Species Act (ESA) Section 7	All Peaker projects	\$15,000/site
National Historic Preservation Act Consultation	All Peaker projects	\$15,000/site

Federal Permit Costs⁸

Permit	Applicable Sites	Estimated Cost
Non-PSD Applicability Determination	Yabucoa, Daguao & Jobos	\$12,000/site
Air Modeling and PSD Application	Costa Sur	\$180,000
NPDES Construction General Permit (CGP) for Storm Water	All Peaker projects	\$21,000/site
Determination of No Hazard to Air Navigation (FAA)	All Peaker projects (when applicable)	Included in DSOW

Local Permit Costs⁹

Permit	Applicable Sites	Estimated Cost
DNER Rule 141 – Environmental Impact Documentation	All Peaker projects	\$35,000/site
PRCF Fire Review	All Peaker projects	\$3,000/site
Permiso Unico Incidental (PUI)	All Peaker projects	\$25,000/site
DNER Asbestos/Lead Removal	All Peaker projects	\$15,000/site
Air Emissions Permit (PFE) for Construction	All Peaker projects	\$20,000/site
Air Emissions Permit (PFE) for Operation	All Peaker projects	\$10,000/site

⁷ All costs are preliminary estimates and are subject to change.

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