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

IN RE:	**CASE NO. NEPR-MI-2021-0002**
IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN-DECEMBER 2020	**SUBJECT: Motion Submitting One (1) FEMA Approval of Project, Request for Confidential Treatment, and Supporting Memorandum of Law**

MOTION SUBMITTING ONE (1) FEMA APPROVAL OF PROJECT, REQUEST FOR CONFIDENTIAL TREATMENT AND SUPPORTING MEMORANDUM OF LAW

TO THE PUERTO RICO ENERGY BUREAU:

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

I. Submittal of One FEMA Approval and Request for Confidentiality

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority ("PREPA") submit to the Energy Bureau the specific transmission and distribution projects ("T&D Projects" or "Projects") to be funded with Federal Emergency Management Agency ("FEMA") funds or any other federal funds at least thirty (30) calendar days prior to submitting these Projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency ("COR3"), FEMA or any other federal agency ("March 26th Order"). It also directed PREPA to continue reporting to the Energy Bureau and FEMA, within the next five years, on the progress of all ongoing efforts related to the approval of the submitted Projects that have

not yet been approved by the Energy Bureau.[1] The Energy Bureau thereafter determined that this directive should be applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 30, 2021, LUMA filed a *Motion Requesting Clarification of a Portion of the Energy Bureau's Resolution and Order Entered on August 20, 2021, and Submitting Updated List of Transmission and Distribution Projects and Twenty-Nine Scopes of Work* ("August 30th Motion"). In the August 30th Motion, LUMA submitted twenty-nine (29) SOWs for T&D Projects for the Energy Bureau's review and approval prior to submitting them to COR3 and FEMA. Among the twenty-nine (29) SOWs, LUMA submitted the "Distribution Pole and Conductor Replacement" SOW.

3. On September 22, 2021, the Energy Bureau issued a Resolution and Order that determined that most of the SOWs for T&D projects submitted by LUMA in the August 30th Motion were necessary to improve the system's reliability ("September 22nd Order"). Therefore, it approved most of the projects presented in the August 30th Motion, including the "Distribution Pole and Conductor Replacement" SOW. The Energy Bureau also ordered LUMA to submit a copy of the approval by COR3 and/or FEMA of the Project, which shall contain the costs obligated for each project within ten (10) days of receiving such approval.

4. As shown in Exhibit 1 of the Motion filed on October 27, 2025, *Motion Submitting LUMA's Consolidated List with Costs Incurred for Obligated Projects*, the "Distribution Pole and Conductor Replacement" SOW is divided into individual projects per region, which include the "FAASt [Pole and Conductor Repair – Arecibo Group 3 – Phase 2]) (Distribution)" T&D Project.[2]

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[1] On April 22, 2026, the Energy Bureau issued a Resolution and Order ("April 22nd Order"), in which it extended the March 26th Order's reporting period for an additional five (5) years. *See* April 22nd Order, p.2. The Energy Bureau stated that all the other provisions of the March 26th Order would remain in full force and effect. *Id*.

[2] The "FAASt [Pole and Conductor Repair – Arecibo Group 3 – Phase 2])(Distribution)" T&D Project was deactivated by FEMA. However, this project has now been reactivated and assigned a new FAAST number. The former FAASt number for this T&D project was 757945; the current FAASt number is 1066739.

5. LUMA is submitting herein a redacted public version of the FEMA approval (**Exhibit 1**) protecting confidential information associated with Critical Energy Infrastructure Information ("CEII"). As explained in this Motion, portions of the FEMA approval of the "FAASt [Pole and Conductor Repair – Arecibo Group 3 – Phase 2]) (Distribution)" T&D Project are protected from disclosure as CEII, *see, e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. § 388.113 (2020), and pursuant to the Energy Bureau's Policy on Management of Confidential Information. *See* Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended by Resolution dated September 20, 2016.

II. Memorandum of Law in Support of Request for Confidentiality

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

6. The bedrock provision on the management of confidential information filed before this Energy Bureau, is Section 6.15 of Act 57-2014, known as the "Puerto Rico Energy Transformation and Relief Act." It provides, in pertinent part, that: "[i]f any person who is required to submit information to the [Energy Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Energy Bureau] to treat such information as such …." 22 LPRA § 1054n (2026). If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, "it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* § 1054n(a).

7. Access to confidential information shall be provided "only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement." *Id.* § 1054n(b). Finally, Act 57-2014 provides that this Energy Bureau "shall keep the

documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review." *Id.* § 1054n(c).

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

9. Moreover, the Energy Bureau's Policy on Management of Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 20, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at ⁋ 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* at ⁋ 6.

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

> Critical Energy Infrastructure Information ("CEII")

> The information designated by the [Energy Bureau] as Validated Confidential Information on the grounds of being CEII may be accessed by the parties' authorized representatives only after they have executed and delivered the Nondisclosure Agreement.
>
> Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party's offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

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

11. Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, also includes a provision for filing confidential information in proceedings before this Energy Bureau. To wit, Section 1.15 provides that "a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed according to […] Article 6.15 of Act No. 57-2015, as amended." *See also* Energy Bureau Regulation No. 9137 on *Performance Incentive Mechanisms,* § 1.13 (addressing disclosure before the Energy Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009).

B. Request for Confidentiality

12. Portions of the FEMA Approval included in **Exhibit 1** contain CEII that, under relevant federal law and regulations, are protected from public disclosure. LUMA stresses that the FEMA Approval with CEII warrants confidential treatment to protect critical infrastructure from

threats that could undermine the system and negatively affect electric power services to the detriment of the interests of the public, customers, and citizens of Puerto Rico.

13. This Energy Bureau has granted LUMA's requests for confidential treatment of portions of the FEMA Approvals submitted for approval in the present case. Notably, the Energy Bureau has granted LUMA's request for confidential treatment of portions of FEMA Approvals of Projects submitted for consideration and authorization. Furthermore, this Energy Bureau designated portions of submitted FEMA Approvals of Projects as confidential CEII in its Resolution and Order of March 20, 2023; *see* Table 1 on pages 1-2.

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

15. CEII or critical infrastructure information is generally exempted from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

> Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:
> (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
> (ii) Could be useful to a person in planning an attack on critical infrastructure;
> (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
> (iv) Does not simply give the general location of the critical infrastructure.

Id.

23. Additionally, "[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively

affect national security, economic security, public health or safety, or any combination of such matters. *Id.* Finally, "[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters." *Id.*

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

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

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

[4] CII includes the following types of information:

25. Portions of the FEMA Approval in **Exhibit 1** qualify as CEII because this document contains the express coordinates and physical addresses to power transmission and distribution facilities (18 C.F.R. § 388.113(iv)), and these specific coordinates and addresses could potentially be helpful to a person planning an attack on the energy facilities listed as part of this FEMA approval. The information is not common knowledge and is not made publicly available. Therefore, it is respectfully submitted that, on balance, the public interest in protecting CEII weighs in favor of protecting the relevant portions of the FEMA Approval with CEII in **Exhibit 1** from disclosure, given the nature and scope of the details included in those portions of the Exhibit.

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

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

C. Identification of Confidential Information

27. In compliance with the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009) below, find a table summarizing the portions of the FEMA approval for which we present this request for confidential treatment.

Document	**Name**	**Pages in which Confidential Information is Found, if applicable**	**Summary of Legal Basis for Confidentiality Protection, if applicable**	**Date Filed**
Exhibit 1	FAASt [Pole and Conductor Repair – Arecibo Group 3 – Phase 2]) (Distribution)	Pages 1-2, 9	Critical Energy Infrastructure Information, 18 C.F.R. § 388.113; 6 U.S.C. §§ 671-674.	July 28, 2026

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; **accept** the copy of the FEMA approval attached herein as **Exhibit 1** and **grant** the request for confidential treatment of **Exhibit 1.**

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to PREPA via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record, Natalia Zayas Godoy, nzayas@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net, and Mirelis Valle Cancel, mvalle@gmlex.net, to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfernandez@ecija.com, José J. Díaz Alonso, jdiaz@ecija.com, and Ernesto R. Ramos Maldonado, eramos@ecija.com.

In Guaynabo, Puerto Rico, on this 28th day of July 2026.

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Exhibit 1

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

Department of Homeland Security
Federal Emergency Management Agency

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General Info

Project #	1066739 **P/W #** 108249	**Project Type**	Specialized
Project Category	F - Utilities	**Applicant**	PR Electric Power Authority (000-UA2QU-00)
Project Title	FAASt [Pole and Conductor Repair - Arecibo Group 3 – Phase 2] / Former project 757945 (Distribution)	**Event**	4339DR-PR (4339DR)
		Declaration Date	9/20/2017
Project Size	Large	**Incident Start Date**	9/17/2017
Activity Completion Date	9/20/2027	**Incident End Date**	11/15/2017
Process Step	Obligated		

Damage Description and Dimensions

The Disaster # 4339DR, which occurred between *09/17/2017* and *11/15/2017*, caused:

Damage #1399584; FAASt [Pole and Conductor Repair-Arecibo Group 3 - Phase 2] (Distribution)

General Facility Information:

- **Facility Type:** Power generation, transmission, and distribution facilities
- **Facility:** Pole and Conductor Repair-Arecibo Group 3 - Phase 2
- **Facility Description:** The specific facilities included in this project are poles and structures (including their foundations), framing and insulators, load break switches (manual and automated), capacitor banks, voltage regulators, transformers (including lightning arresters and fuse cut-outs), conductors, guy wires, anchoring, grounding assemblies, underground cables, underground cable systems, and fault interrupting equipment (fuses, reclosers, and sectionalizes).
- **Approx. Year Built:** 1980
- **Start GPS Latitude/Longitude:** [redacted]
- **End GPS Latitude/Longitude:** [redacted]

Final Scope

1399584 **FAASt [Pole and Conductor Repair-Arecibo Group 3 - Phase 2] (Distribution)**

5.0 INTRODUCTION

Pursuant to FEMA's Post-Fixed Cost Estimate Obligation SOP (the "SOP") for FAASt projects, FAASt subrecipients must provide to FEMA recovery project scopes of work ("SOW") for the proposed construction work to be performed. The SOW defines the activities that will be performed using Public Assistance ("PA") funding and includes § 406 hazard mitigation proposals ("HMPs").

According to the SOP, FEMA "anticipates that [SOW] submissions might include preliminary designs, including drawings and cost estimates. FEMA also recognizes that, generally, architects and/or engineers do not include or delineate the information needed to enable FEMA to complete programmatic reviews. Therefore, in those cases, subrecipients must ensure to submit all the information described [in the SOP] and not limit the submission to a drawing set. Refer to Part C - II. Recipient/Subrecipient Checklist for Submissions as a guide to review completeness." SOP at 4.

This document contains the detailed SOW for FEMA PA project 1066739 Arecibo Group 3 – Phase 2 under DR-4339-PR Public Assistance. The document provides a detailed description of the project, scope of PA construction activities to be completed, common

EHP review information, proposed hazard mitigation measures, and project cost estimates. LUMA is seeking approval from COR3 and FEMA for PA funding for the scope described in this document.

LUMA submits this Detailed SOW pursuant to the Transmission and Distribution Operations and Maintenance Agreement between the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and LUMA, and in accordance with the Consent to Federal Funding Letter issued by PREPA and P3A, which collectively provides the necessary consent for LUMA, as agent of PREPA, to undertake work in connection with any Federal Funding requests related to the T&D System submitted to FEMA. References to “Subrecipient” herein refer to PREPA pursuant to this agreement and consent for LUMA to act as its agent with respect to federal funds.

6.0 PROJECT DESCRIPTION

The project’s scope is the replacement of poles and the repair of conductors of the feeders listed in Section 7.2 located in the Arecibo region. The proposed restoration includes the replacement of eligible disaster damage up to required codes and standards and the request to upgrade undamaged infrastructure to fully effectuate the restoration of disaster-damaged components and restore the system’s function to an approved industry standard. The Scope of Work consists of the removal and replacement of infrastructure to restore this facility to codes and standards. As a hazard mitigation proposal this project will replace damaged poles with higher-rated poles to withstand winds of up to 160mph.

7.0 FACILITIES

7.1 FACILITIES LIST – BUILDINGS AND SUBSTATIONS

None.

7.2 FACILITIES LIST – OTHER FACILITIES

The following list includes the name and GPS coordinates identifying the areas of work for other types of facilities. For any access roads or other line work, coordinates listed below are the beginning and end points.

The interconnected and inter-functional distribution feeders (sites) that are the object of this scope of work are part of the electrical distribution system in the Arecibo Region. All the feeders originate from a substation (start) and serve customers along the route to various locations (end). The coordinates shown below as "GPS End" represent the end of each feeder's mainline backbone.

Name	Feeder Number	# of Poles to be Replaced	GPS Start	GPS End	Phase	Voltage Level (kV	Construction Date
ARECIBO HOSPITAL DISTRITO, SUB. 8015	8015-09	7	[redacted]		Single Phase	13.2	More than 20 years
CAMBALACHE, SUB. 8004	8004-02	13			Single Phase	4.16	More than 20 years
CAMBALACHE, SUB. 8004	8004-03	17			Single Phase	4.16	More than 20 years
ARECIBO HOSPITAL DISTRITO, SUB. 8001	8001-01	21			Single Phase	4.16	More than 20 years
CAMBALACHE, SUB. 8004	8004-04	29			Single Phase	4.16	More than 20 years

See Appendix A – Structure Coordinates for the coordinates of each structure included in this project.

8.0 PROJECT AREA MAP WITH BOUNDARIES OF CONSTRUCTION

Please see the attached map identified as Arecibo Group 3 - Phase 2 – Boundaries of construction at Appendix D, which includes images of the individual feeders.

Refer to document: 1066739-DR4339PR-Detailed SOW Arecibo Group 3 - Phase 2 Rev0.pdf

9.0 § 428 SCOPE OF WORK

The proposed type of work for this project:

X Standard Project: Restores the facility/facilities to pre-disaster design and function to locally adopted codes/standards and/or FEMA-approved industry standards.

9.1 DESCRIPTION OF PROPOSED WORK TO BE PERFORMED

The Scope of Work entails the removal and replacement of infrastructure necessary to restore the facility in compliance with applicable codes and standards.

Feeder 8001-01 Scope:

Remove	Quantity	Replace With	Quantity
30' WOOD	1	50FT GAL STEEL ROUND POLE	1
35' WOOD	13	50FT GAL STEEL ROUND POLE	13
40' WOOD	6	50FT GAL STEEL ROUND POLE	6
45' CONCRETE	1	50FT GAL STEEL ROUND POLE	1

Feeder 8004-02 Scope:

Remove	Quantity	Replace With	Quantity
30' WOOD	1	50FT GAL STEEL ROUND POLE	1
35' WOOD	5	50FT GAL STEEL ROUND POLE	5
40' WOOD	6	50FT GAL STEEL ROUND POLE	6
45' CONCRETE	1	50FT GAL STEEL ROUND POLE	1

Feeder 8004-03 Scope

Remove	Quantity	Replace With	Quantity
35' WOOD	13	50FT GAL STEEL ROUND POLE	13
40' WOOD	4	50FT GAL STEEL ROUND POLE	4

Feeder 8004-04 Scope:

Remove	Quantity	Replace With	Quantity
35' WOOD	26	50FT GAL STEEL ROUND POLE	26
40' WOOD	1	50FT GAL STEEL ROUND POLE	1
40' CONCRETE	2	50FT GAL STEEL ROUND POLE	2

Feeder 8015-09 Scope:

Remove	Quantity	Replace With	Quantity
35' WOOD	5	50FT GAL STEEL ROUND POLE	5
40' WOOD	2	50FT GAL STEEL ROUND POLE	2

The pole replacement work includes the following actions:

1. Remove existing poles, including hardware, and install new poles, including hardware. Columns C and D of the "LPCE" tab of Appendix B lists each pole that is proposed as a §428 replacement and §406 replacement, respectively. Column E of the "LPCE" tab of Appendix B lists each pole that is to be removed, with Column F describing each pole's hardware scenario, and scenarios are in turn described in the "Hardware Scenarios" tab of Appendix B. That tab is correlated with cost information.

2. New guy wire/anchors are to be installed within 3 feet of the existing anchor location in compliance with the LUMA Overhead Electrical Distribution System Manual. The maximum distance an anchor will be installed for a 50-foot pole is 25 feet from the base of the pole, within the easement.

3. All work for this program will be performed within the current electrical easement.

9.2 CODES & STANDARDS

Per FEMA's SOP, the locally adopted codes/standards and/or FEMA-approved industry standards used for this project are provided below:

1. Distribution Construction Standards (Concrete Base Standard), available in Grants Portal - Applicant Event Profiles.

2. LUMA Overhead Electrical Distribution System Manual, version 4.0, available in Grants Portal - Applicant Event Profiles.

3. Consensus-based codes, per FEMA's Public Assistance Alternative Procedures (Section 428) Guide for Permanent Work FEMA-4339-DR-PR (Feb. 2020).

4. Industry standards per FEMA Recovery Policy FP-104-009-5, Version 2, Implementing Section 20601 of the 2018 Bipartisan Budget Act through the Public Assistance Program.

5. FEMA Recovery Interim Policy FP-104-009-11 Version 2.1, Consensus-Based Codes, Specifications, and Standards for Public Assistance.

6. LUMA's latest Design Criteria Document (DCD) which aggregates the design considerations of most of the consensus-based codes, specifications, and standards listed in FEMA Recovery Interim Policy 104-009-11 Version 2.1 (Dec. 20, 2019).

10.0 § 406 HAZARD MITIGATION PROPOSAL (Refer to document: 1066739-DR4339PR-Detailed SOW Arecibo Group 3 - Phase 2 Rev0.pdf)

11.0 COMMON EHP REVIEW INFORMATION

Please check any items applicable to the proposed scope of work in this Project. If an item is checked, provide a description of the scope extent and location of the selected activity.

X Ground disturbance outside of existing footprint. If checked, provide a description of the ground disturbing activities including the extent, location, and depth of the disturbance.

- Remove existing poles, including hardware, and install new poles, including hardware. No ground disturbance will occur outside the footprint.

- All pole installations are to replace existing pole locations; no new locations are included in this scope of work. For the depths of the poles to be installed, refer to APPENDIX C—Project Considerations, column C (Soil area and depth impact).

- The existing foundation will be removed and replaced with a new concrete foundation base as per Distribution Construction Standards (Concrete Base Standard). The maximum auger width to be used is 42” and the maximum depth to be drilled is 15ft. Refer to APPENDIX C – Project Considerations column I (Concrete Foundation) for specific locations where this work applies.

- New guy wires/anchors are to be installed within 3 feet of the existing anchor in compliance with the LUMA Overhead Electrical Distribution System Manual. The maximum distance an anchor will be installed for a 50-foot pole is 25 feet from the base of the pole, within the easement.

- The following equipment will be used: Skid Steer, Excavator, Dump trucks, Manlifts, 120-ton Motor Crane, Boom Trucks, 45-ton Crane, Zoom Boom, Air compressor, Truck Digger, Water truck, Pump Truck, Concrete Vibrator, Oil Tanker, Filtering Machine, and Flatbed platform.

__ Soil testing or boring to be performed as part of pre-construction activities. If checked, provide a description, location, and dimensions of the testing/boring activities.

__ Relocation of utilities. If checked, include a description of the relocation including the type of utility, relocation coordinates, and the extent and depth of associated ground disturbance.

X Vegetative Removal. If checked, describe the removal work to be performed, its location, and its extent.

- Vegetation clearance will be performed solely to the extent that it allows crews to conduct work and will be limited to 10-foot radius surrounding the surface of the pole but not to exceed the width of the right-of-way. This is for the exclusive purpose of gaining access to the pole to conduct repairs. The costs related to Vegetation clearance procedures are covered in project [727540] FAASt [Region 2 - Arecibo Group C] (Vegetation). The vegetation removal process will be managed according to federal and state regulations.

- Vegetation will be removed utilizing machete, chainsaw, electric pruner, telescopic pole pruner, bucket truck, and/or chipper.

X Demolition. If checked, include a description of what will be removed and the extent and depth of any ground disturbing activities. Additionally, include a description of (1) demolition debris type (construction debris, white goods, hazardous materials, etc.); (2) GPS location of temporary debris storage sites; (3) final debris disposal location; and (4) final debris disposal method.

- PCBs, oil from the transformer and breakers, sealants, and other chemical wastes typical of a construction site are considered hazardous waste and will be disposed of by the contractor in approved facilities.

- Transformers will be contained and returned to LUMA in compliance with applicable regulations. Removing the transformer will require testing the existing oil for PCB levels. Per environmental regulations, the oil will be drained and delivered to the authorized waste disposal site.

- GPS location of temporary debris storage sites, final debris disposal locations, and final debris disposal methods are not yet available.

X Staging areas, landing area for air transport, and access roads. If checked, provide GPS location of staging areas, and access roads. Include a description of the extent of any related vegetative removal, ground disturbance, or stabilization measures required (such as

gabion walls, retaining walls, paving, etc.)

- All work for this program will be performed within the current electrical easement.

- Poles are close to the roads and are site accessible with existing access points at the established locations. The construction of access roads is not required for this scope of work. Refer to APPENDIX C—Project Considerations in column H, “Site Accessible.”

- All materials are stored and dispatched from the Arecibo Regional Warehouse, located at Carr. 681 Km 0.1, Bo. Islote Arecibo, PR (18.46947, -66.70533). No additional or temporary staging areas are required.

X Fill material. If the project includes the use of fill material, provide the source of the fill material including the provider’s name and address (if known).

- Fill, gravel, and sand materials will be obtained from an approved supplier as referenced in the LUMA Vendor Directory List in Grants Portal - Applicant Event Profiles. LUMA will retain and make available for review the documentation provided by material suppliers.

__ Work in water, including coffer dams, dredging, placement of equipment in water, or other work in wetlands. If checked, provide a description of the activities to be performed in water or wetlands.

The following items are generally intended for buildings:

__ Facility is over 45 years old. If checked, provide a thorough description of materials to be used and method of repair, including cleaning methods. If substitute materials will be used in the restoration, specify whether they match the original color, texture, and design of the damaged facility.

__ Known renovations to the facility. If checked, provide dates of any previous major renovations to the interior or exterior of the facility.

__Photos of all sides of the facility are provided.

12.0 PROJECT COST ESTIMATE (PCE)

The estimated costs (compliant with Class 3 Accuracy +/-30%) to complete the project are summarized in the table(s) below. The cost estimate(s) was developed utilizing preliminary Architectural and Engineering design information. For a more detailed cost estimate refer to the referenced appendix/appendices.

COST ESTIMATE			
Cost Element	**428**	**406**	**PROJECT TOTAL**
PLANNING	**$223,811.97**	**$6,563.98**	**$230,375.95**
(A&E) Permitting and Assessments	10,657.71	$312.57	$10,970.28
(A&E) Environmental Documentation & Management	$47,367.62	$1,389.20	$48,756.82
(A&E) Engineering Services & Design	$165,786.64	$4,862.21	$170,648.85
MANAGEMENT	**$85,261.71**	**$2,500.56**	**$87,762.27**
(A&E) Design Development Project Management A&E	$2,842.06	$83.35	$2,925.41

(A&E) Design Lodging & Per Diem A&E	$-	$-	$-
Project Management	$16,104.99	$472.33	$16,577.32
Construction Management	$23,683.81	$694.60	$24,378.41
Contracting, Procurement, & Contract Administration	$28,420.57	$833.52	$29,254.09
Project Controls (Scheduling, Estimating, Support, Cost Control, Risk, Document Control & Reporting)	$14,210.28	$416.76	$14,627.04
Arecibo Group 3 – Phase 2	**$2,647,706.13**	**$77,652.31**	**$2,725,358.44**
Material, labor and equipment	$2,074,364.08	$69,460.21	$2,143,824.29
Lodging & Per Diem & Travel	$294,016.50	$-	$294,016.50
Construction Contingency	$208,274.14	$6,108.29	$214,382.43
Escalation	$71,051.41	$2,083.81	$73,135.22
COST TOTALS	**$2,956,779.81**	**$86,716.85**	**$3,043,496.66**
DEDUCTIONS	**TOTAL INSURANCE PROCEEDS RECEIVED**		**$-**
	DE-OBLIGATION TO FAASt IF APPLICABLE		**$-**
FAASt ALLOCATIONS	FAAST PROJECT # 1066739 - 428		$2,557,027.99
	FAAST PROJECT # 1066739 - 406HM		$86,716.85
	FAAST PROJECT # TOTAL:		**$2,643,744.84**
	FAASt A&E # 335168 - 428		$226,654.03
	FAASt A&E # 335168 - 406 HM		$6,647.33
	FAASt A&E # 335168 TOTAL		**$233,301.36**
	FAASt E&M #673691 - 428		$173,097.79

	FAASt E&M #673691 - 406 HM	$69,460.21
	FAASt E&M #673691 TOTAL	**$242,558.00**

Project Cost Summary, 428 Version 0:

Work to be Completed (WTBC): $2,956,779.81

A&E Deduction (Global A&E FAASt 335168): -$226,654.03

E&M Deduction (Global E&M FAASt 673691): -$173,097.79

Project Total: $2,557,027.99

Project Cost Estimate Notes:

1. Refer to detailed SOW provided in document labeled: "1066739-DR4339PR-Detailed SOW Arecibo Group 3 - Phase 2 Rev0.pdf"

2. Refer to detailed Cost Estimate provided in document labeled: "1066739-DR4339PR-Appendix B - Detail Cost Estimate - Arecibo Group 3 - Phase 2 REV0 .xlsx"

3. A&E cost included in this project will be reduced from this project and obligated under the FAASt Project #335168, A&E, as shown in the table above. The A&E project was obligated to track and account for costs associated with individual FAASt projects. 4. Equipment and material costs included in this project will be reduced from this project and obligated under FAASt Project #673691, Equipment and Materials, as shown in the table above. Only the base cost of equipment and/or material will be reduced from this project (not labor). All costs associated with Planning, Management, General Conditions, and Contingencies will remain in this project.

4. This project is part of Donor FAASt 136271 – MEPA078 Puerto Rico Electrical Power Authority (PREPA) Island Wide FAASt Project.697.

5. Attachments:

   A. Appendix A - Structure Coordinates, 1066739-DR4339PR-Appendix A - Structure Coordinates - Arecibo Group 3 - Phase 2 Rev0.xlsx

   B. Appendix B - Detailed Cost Estimate, 1066739-DR4339PR-Appendix B - Detail Cost Estimate - Arecibo Group 3 - Phase 2 REV0 .xlsx

   C. Appendix C - Project Considerations, 1066739-DR4339PR-Appendix C - Project Considerations Arecibo Group 3 - Phase 2 Rev0.xlsx

   D. Appendix D - Arecibo Group 3 - Phase 2 -Boundaries of construction, 1066739-DR4339PR-Appendix D - Arecibo Group 3 - Phase 2 -Boundaries of construction - SATELLITE VIEW.pdf

406 HMP Scope

Project number: 1066739

Damage # 1399584**;**

FAASt [Pole and Conductor Repair-Arecibo Group 3 - Phase 2] (Distribution)

Applicant: PR Electric Power Authority (000-UA2QU-00)

Location: Arecibo, Puerto Rico

Start GPS Latitude/Longitude: [redacted]

End GPS Latitude/Longitude: [redacted]

During the incident period from September 17, 2017, to November 15, 2017, the Commonwealth of Puerto Rico experienced hurricane-force winds, heavy rain, flooding, and power outage "loss of power" from Hurricane Maria. The incident caused damage to the electrical system, such as the power generation plants, transmission and distribution lines, substations, communication systems, buildings, among other damages to the infrastructures owned, operated, and maintained by the Puerto Rico Electric Power Authority (PREPA).

Project #1066739 FAASt [Pole and Conductor Repair - Arecibo Group 3 – Phase 2] / Former project 757945 (Distribution)

The Distribution Pole and Conductor Repair -- Arecibo Group 3 Phase 2 consists of five (5ea) interconnected and inter-functional distribution feeders (sites) establish the electrical distribution system as follows: ARECIBO HOSPITAL DISTRITO, SUB. 8015 (8015-09); CAMBALACHE, SUB. 8004 (8004-02); CAMBALACHE, SUB. 8004 (8004-03); ARECIBO HOSPITAL DISTRITO, SUB. 8001 (8001-0) and CAMBALACHE, SUB. 8004 (8004-04).

The Method of Repair (MOR) included the replacement of the damaged critical distribution poles (wood, concrete or galvanized), cross-arms, insulators, and all associated hardware needed for the new structure. According to the information provided by the Applicant, due to the high velocity hurricane winds, wind-blown debris, and prolonged heavy rain, were the main cause of the damages of the facilities.

In order to minimize the damages in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance to +160mph. Note: The FEMA Accelerated Award Strategy (FAASt) MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The +160mph wind tolerance mitigation measure, will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards.

Hazard Mitigation Proposal (HMP) Scope of Work:

In order to prevent or reduce future damages from similar events, the applicant proposed the following mitigation measures:

Mitigation Measures *(Replacement)*

1. To avoid damage in a future event, the Applicant is proposing as a mitigation measure, increase the strength of the poles by increasing the wind tolerance of all materials to +160mph. The FAASt MOR included the PREPA distribution standards and specifications that were based on a 145mph sustained winds. However, the new PREPA Standard 2021 updates the design-criteria to a 160mph sustained winds resistant. The above mitigation measures will protect and make the affected infrastructure more resistant, stronger, and resilient to similar hazards. Refer to Appendix J: Section VI.D.1 of the PAPPG V3.1.

[Distribution Critical Poles Replacement] 406 Mitigation Scope of Work:

1. Feeder 8001-01 Scope:
   - Replace twenty (20) 50' Galvanized Steel Round Poles by twenty (20) 45' S5.7 Galvanized Steel Poles.
   - Replace one (1) 50' Galvanized Steel Round Pole by one (1) 50' S8.5 Galvanized Steel Pole.
2. Feeder 8004-02 Scope:
   - Replace twelve (12) 50' Galvanized Steel Round Poles by twelve (12) 45' S5.7 Galvanized Steel Poles.
   - Replace one (1) 50' Galvanized Steel Round Pole by one (1) 50' S8.5 Galvanized Steel Pole.
3. Feeder 8004-03 Scope:
   - Replace sixteen (16) 50' Galvanized Steel Round Poles by sixteen (16) 45' S5.7 Galvanized Steel Poles.
   - Replace one (1) 50' Galvanized Steel Round Pole by one (1) 50' S8.5 Galvanized Steel Pole.
4. Feeder 8004-04 Scope:
   - Replace twenty-two (22) 50' Galvanized Steel Round Poles by twenty-two (22) 45' S5.7 Galvanized Steel Poles.
   - Replace seven (7) 50' Galvanized Steel Round Poles by seven (7) 50' S8.5 Galvanized Steel Poles.
5. Feeder 8015-09 Scope:

- Replace six (6) 50' Galvanized Steel Round Poles by six (6) 45' S5.7 Galvanized Steel Poles.
- Replace one (1) 50' Galvanized Steel Round Pole by one (1) 50' S8.5 Galvanized Steel Pole.

Hazard Mitigation Proposal (HMP) Cost

Total Net Hazard Mitigation Cost (Base Cost) =		**$69,460.21**
+ HM (Applicant A&E, Management & General Conditions) =		**$17,256.64**
Hazard Mitigation Total Cost =	**$86,716.85**	

Hazard Mitigation Proposal (HMP) Cost Distribution:

Equipment and Materials (E&M) =	**$69,460.21**
Architecture and Engineering (A&E) =	**$ 6,647.33**
Construction Cost =	**$10,609.31**
Hazard Mitigation Total Cost =	**$86,716.85**

HMP Cost-Effectiveness Calculations

FEMA's Benefit-Cost Analysis (BCA), methodology evaluates expected risk reduction benefits of a hazard mitigation project and compares those benefits to the cost of the mitigation project. FEMA Public Assistance Program and Policy Guide (PAPPG) Chapter 2. Section VII. C. defines cost effective mitigation as: The Hazard Mitigation Measure is cost effective through an acceptable Benefit Cost Analysis (BCA) with a resulting Benefit Cost Ratio equal to or greater than (1).

The Island Wide Benefit Cost Analysis (IWBCA) created for the PREPA infrastructure defines a maximum potential benefit using the incurred costs of the PREPA FEMA Accelerated Award Strategy (FAASt) fixed cost estimate, the mission assignments utilized for the reconnection effort, and the costs associated with loss of service. This maximum benefit has been developed to fund all mitigation projects from both Public Assistance Hazard Mitigation and the Hazard Mitigation Grant program.

It is the applicant's responsibility to maintain a record of approved IWBCA related projects to avoid running out of funds for their Mitigation portion projects.". Please see attached IWBCA Package

The cost of the Hazard Mitigation Proposal (HMP) described herein is $86,716.85 (Hazard Mitigation Total Cost). The cost of this HMP combined will all other proposals (both PA and HMGP) does not exceed the maximum potential benefit and is therefore deemed cost effective per FEMA Public Assistance Program and Policy Guide (PAPPG) V3.1 April 2018, Chapter 2, VII., Section C, BCA Rule. This Hazard Mitigation Proposal meets eligible repair and restoration cost-effective requirements.

**See Mitigation Profile Documents Tab in Grants Manager for complete version of this HMP and supporting documents *(HMP, HMP cost estimate, Supporting documents file)*.

Cost

Code	Quantity	Unit	Total Cost	Section
9001	1	Lump Sum	$2,956,779.81	Uncompleted
9001	1	Lump Sum	($173,097.79)	Uncompleted
3510	1	Lump Sum	($226,654.03)	Uncompleted

CRC Gross Cost	$2,557,027.99
Total 406 HMP Cost	$86,716.85
Total Insurance Reductions	$0.00
CRC Net Cost	$2,643,744.84
Federal Share (90.00%)	$2,379,370.36
Non-Federal Share (10.00%)	$264,374.48

Subgrant Conditions

- As described in Title 2 Code of Federal Regulations (C.F.R.) § 200.333, financial records, supporting documents, statistical records and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. Exceptions are stated in 2 C.F.R. §200.333(a) – (f)(1) and (2). All records relative to this project are subject to examination and audit by the State, FEMA and the Comptroller General of the United States and must reflect work related to disaster-specific costs.
- The terms of the FEMA-State Agreement are incorporated by reference into this project under the Public Assistance award and the applicant must comply with all applicable laws, regulations, policy, and guidance. This includes, among others, the Robert T. Stafford Disaster Relief and Emergency Assistance Act; Title 44 of the Code of Federal Regulations; FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide; and other applicable FEMA policy and guidance.
- The DHS Standard Terms and Conditions in effect as of the declaration date of this emergency declarations or major disaster, as applicable, are incorporated by reference into this project under the Public Assistance grant, which flow down from the Recipient to subrecipients unless a particular term or condition indicates otherwise.
- The Uniform Administrative Requirements, Cost Principles, and Audit Requirements set forth at Title 2 Code of Federal Regulations (C.F.R.) Part 200 apply to this project award under the Public Assistance grant, which flow down from the Recipient to all subrecipients unless a particular section of 2 C.F.R. Part 200, the FEMA-State Agreement, or the terms and conditions of this project award indicate otherwise. See 2 C.F.R. §§ 200.101 and 110.
- The subrecipient must submit a written request through the Recipient to FEMA before it makes a change to the approved scope of work in this project. If the subrecipient commences work associated with a change before FEMA approves the change, it will jeopardize financial assistance for this project. See FEMA Policy No. 104-009-2, Public Assistance Program and Policy Guide.
- When any individual item of equipment purchased with PA funding is no longer needed, or a residual inventory of unused supplies exceeding $5,000 remains, the subrecipient must follow the disposition requirements in Title 2 Code of Federal Regulations (C.F.R.) § 200.313-314.
- Pursuant to section 312 of the Stafford Act, 42 U.S.C. 5155, FEMA is prohibited from providing financial assistance to any entity that receives assistance from another program, insurance, or any other source for the same work. The subrecipient agrees to repay all duplicated assistance to FEMA if they receive assistance for the same work from another Federal agency, insurance, or any other source. If an subrecipient receives funding from another federal program for the same purpose, it must notify FEMA through the Recipient and return any duplicated funding.
- In the seeking of proposals and letting of contracts for eligible work, the Applicant/Subrecipient must comply with its Local, State (provided that the procurements conform to applicable Federal law) and Federal procurement laws, regulations, and procedures as required by FEMA Policy 2 CFR Part 200, Procurement Standards, §§ 317-326.
- The Recipient must submit its certification of the subrecipient's completion of this project, the final claim for payment, and supporting documentation within 180 days from the date that the applicant completes the scope of work, or the project deadline, whichever occurs first. FEMA reimburses Large Projects (those with costs above the large project threshold) based on the actual eligible final project costs. Therefore, during the final project reconciliation (closeout), the project may be amended to reflect the reconciliation of actual eligible costs.
- The Subrecipient provided the estimate for this PW. FEMA validated the estimate and found it to be reasonable for the work to be performed.

Insurance

Additional Information

5/29/2026

Does the Applicant have a Commercial Policy: Yes.

Does the Applicant's Commercial Policy extend coverage for the damage described in this project: No.

Property insurance coverage for the electrical distribution facilities represented on this project are not insured or insurable. No insurance relief is anticipated. No Obtain and Maintain requirement will be made.

FEMA requires the applicant to take reasonable efforts to pursue claims to recover insurance proceeds that it is entitled to receive from its insurer(s). In the event that any insurance proceeds are received for these expenses those proceeds must be reduced from FEMA Public Assistance funding to ensure no duplication of benefits has occurred.

No duplication of benefits from insurance is anticipated for work described in this application. In the event any part or all costs are paid by an insurance policy, a duplication of benefits from insurance will occur. Applicant must notify grantee and FEMA of such recoveries and the Sub-Grant award amount must be reduced by actual insurance proceeds.

No insurance requirements will be required for this project. Insurance requirements are specific to permanent work to replace, restore, repair, reconstruct, or construct buildings, contents, equipment, or vehicles. (FEMA Recovery Policy FP 206-086-1).

No insurance narrative will be produced or uploaded into documents or attachments.

Jean-Carlo Echevarria, PA Insurance Specialist, CRC Atlantic, Guaynabo, PR

O&M Requirements

There are no Obtain and Maintain Requirements on **FAASt [Pole and Conductor Repair - Arecibo Group 3 – Phase 2] / Former project 757945 (Distribution)**.

406 Mitigation

There is no additional mitigation information on **FAASt [Pole and Conductor Repair - Arecibo Group 3 – Phase 2] / Former project 757945 (Distribution)**.

Environmental Historical Preservation

Is this project compliant with EHP laws, regulations, and executive orders? **Yes**

EHP Conditions

- Any change to the approved scope of work will require re-evaluation for compliance with NEPA and other Laws and Executive Orders.
- This review does not address all federal, state and local requirements. Acceptance of federal funding requires recipient to comply with all federal, state and local laws. Failure to obtain all appropriate federal, state and local environmental permits and clearances may jeopardize funding.
- If ground disturbing activities occur during construction, applicant will monitor ground disturbance and if any potential archaeological resources are discovered, will immediately cease construction in that area and notify the State and FEMA.
- On May 16, 2025, the Secretary of the U.S. Department of Energy (DOE) issued Order 202-25-2 (Order), pursuant to the authority vested in him by section 202(c) of the Federal Power Act (FPA), 16 U.S.C. § 824a(c), and section 301(b) of the Department of Energy Organization Act, 42 U.S.C. § 7151(b). The Order sought to expedite repair and maintenance efforts to the elec-trical grid of Puerto Rico by directing the Puerto Rico Electric Power Authority (PREPA) to per-form vegetation management, including vegetation clearing to re-establish a right-of-way, for particular transmission and distribution facilities in the Territory as specified in the Order. The Order required PREPA to identify certain parameters by which the directed work would be performed, and required that all work be performed, to the maximum extent practicable, in a manner consistent with all applicable Federal, State, or local environmental laws or regu-lations and minimize any adverse environmental impacts. However, pursuant to Section 202(c)(3) of the FPA, to the extent any omission or action taken by PREPA that was necessary to comply with the Order, including any

omission or action taken to voluntarily comply with the Order, caused PREPA to not comply with any Federal, State, or local environmental law or regulation, including any environmental conditions in this REC's "Standard Conditions," such omission or action shall not be considered a violation of such environmental law or regulation, or subject PREPA to any requirement, civil or criminal liability, or citizen suit under such environmental law or regulation. On August 15, 2025, DOE reissued the Order to direct PREPA to also perform asset management, including component refurbishment and replacement. To renew/reissue the Order, DOE was required to consult with the primary Federal agency with expertise in the environ-mental interest protected by such law or regulation and include in the Order conditions necessary to minimize any adverse environmental impacts to the extent practicable. Pursuant to Section 202(c)(4)(B) of the FPA, DOE provided the relevant agencies the opportunity to submit conditions for worked performed under the Order, to be included in the Order. According to DOE, no conditions were submitted by the agencies for inclusion in the Order. On November 12, 2025, DOE reissued the Order to direct PREPA to also perform asset management, including component refurbishment and replacement. DOE and FEMA have agreed that DOE is the lead agency for activities that fall under the prior and any future DOE 202(c) orders issued under the Federal Power Act to resolve the current and related emergencies in Puerto Rico. FEMA has requested that DOE provide FEMA with all documentation relating to their EHP compliance. FEMA will review and incorporate all available information and data for this project pertaining to applicable environmental laws and regulations into this REC when it is received from DOE. On February 10, 2026, and again on May 7, 2026, DOE reissued the Order to direct PREPA to perform vegetation management, including vegetation clearing to re-establish the right-of-way, and asset management, including component refurbishment and replacement, to en-sure operational availability of the transmission and distribution facilities.

EHP Additional Info

There is no additional environmental historical preservation on **FAASt [Pole and Conductor Repair - Arecibo Group 3 – Phase 2] / Former project 757945 (Distribution)**.

Final Reviews

Final Review

Reviewed By LEFRANC-GARCIA, CARLOS L. **Reviewed On** 06/25/2026 1:49 PM PDT

Review Comments

The project’s scope is the replacement of poles and the repair of conductors of the feeders listed in Section 7.2 located in the Arecibo region. The proposed restoration includes the replacement of eligible disaster damage up to required codes and standards and the request to upgrade undamaged infrastructure to fully effectuate the restoration of disaster-damaged components and restore the system’s function to an approved industry standard. The Scope of Work consists of the removal and replacement of infrastructure to restore this facility to codes and standards. As a hazard mitigation proposal this project will replace damaged poles with higher-rated poles to withstand winds of up to 160mph. CRC Gross Cost:$2,557,027.99 Total 406 HMP Cost :$86,716.85 Federal Share (90.00%):$2,379,370.36 Subrecipient and its agents are responsible for complying with all grants and subgrant conditions, including any applicable Federal, State and local requirements. - CLG 0625

Recipient Review

Reviewed By Mulero, Noel **Reviewed On** 07/12/2026 11:05 PM PDT

Review Comments

Recipient review completed. Applicant must ensure to compliance with all regulatory requirements, Record of Environmental Consideration (REC) Special Conditions and PA policy. Project is ready for applicant review.

Project Signatures

Reviewed By Unsigned **Reviewed On** Unsigned

Award Information

EMMIE Imported Version Information

Version #	Eligibility Status	Current Location	Bundle Number	Project Amount	Cost Share	Federal Share Obligated	Date Obligated
No Records							

Drawdown History

EMMIE Drawdown Status As of Date	IFMIS Obligation #	Expenditure Number	Expended Date	Expended Amount
No Records				

Obligation History

Version #	Date Obligated	Obligated Cost	Cost Share	IFMIS Status	IFMIS Obligation #
0	7/20/2026	$2,379,370.36	90%	Accepted	4339DRPRP01082491