

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

NEPR

Received:

Aug 14, 2026

3:47 PM

IN RE:

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

CASE NO.: NEPR-MI-2021-0014

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

**MOTION TO SUBMIT QUARTERLY REPORT ON CONSUMABLES, SPARE PARTS,
AND CAPITAL SPARE PARTS FOR THE FOURTH QUARTER OF FISCAL YEAR 2026**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On June 16, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order (“June 16th Resolution”), whereby it established Docket No. NEPR-MI-2021-0014 to remain informed about the operating state of the Electric Power System and for filing of material related to the maintenance and repair of PREPA’s generation fleet. The Energy Bureau noted the obligations of Genera pursuant to Section 4.2 of the LGA OMA to report on the available inventory of Consumables, Spare Parts, and Capital Spare Parts for each Legacy Generation Asset which could be used for offsetting other costs and

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (defined in the LGA OMA), and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

expenses.² Additionally, in this docket, the Energy Bureau required Genera to file its June 1, 2023, Recommendation Letter and any future recommendations mandated by Section 4.2(j) of the LGA OMA, following the same submission timelines specified in that section.

2. On December 12, 2023, Genera filed a document titled *Motion to Submit Amended Response to Resolution and Order Dated November 29, 2023* (“December 12th Motion”), through which Genera submitted a revised assessment of Consumables, Spare Parts and Capital Spare Parts, pursuant to the Energy Bureau's November 29th Resolution.

3. On February 26, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing* (“February 26th Resolution”). In the February 26th Resolution, the Energy Bureau informed that they had found that Genera satisfactorily reflected the Energy Bureau's direction, subject to certain reporting requirements listed in Attachment A to the February 26th Resolution.

4. The Energy Bureau, through the February 26th Resolution, approved the final version of the revised assessment of Consumables, Spare Parts, and Capital Spare Parts subject to the Quarterly Reporting Requirements established in Attachment A of the February 26th Resolution, and order Genera to file the foregoing Quarterly Reports within 45 days after the end of each quarter.

5. In compliance with the February 26th Resolution, Genera respectfully submits the Fourth Quarter (“Q4”) Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026 as Exhibit A to this Motion.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera's Q4 Report on Consumables, Spare Parts, and Capital

² See, Section 4.2 (j) of the LGA OMA.

Spare Parts for FY2026 as Exhibit A herein; and **deem** Genera to be in compliance with the February 26th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of August 2026.

CERTIFICATE OF SERVICE: We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to the following counsel of record: alexis.rivera@prepa.pr.gov; mvalle@gmlex.net; nzayas@gmlex.net; rcruzfranqui@gmlex.net; margarita.mercado@us.dlapiper.com; katiuska.bolanos-lugo@us.dlapiper.com; karenortiz@aes.com; elias.sostre@aes.com; carlos.reyes@ecoelectrica.com.

ECIJA SBGB

PO Box 363068
San Juan, Puerto Rico 00920
Tel. (787) 300.3200
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo

Jorge Fernández-Reboredo
jfernandez@ecija.com
TSPR 9,669

/s/ José Javier Díaz Alonso

José Javier Díaz Alonso
jdiaz@ecija.com
TSPR 21,718

/s/ Ernesto Raúl Ramos Maldonado

Ernesto Raúl Ramos Maldonado
eramos@ecija.com
TSPR 23,882

Exhibit A

Q4 Report on Consumables, Spare Parts, and Capital Spare Parts for FY2026

Docket Number: NEPR-MI-2021-0014

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

RE: **FY26 – Q4 Report** – Maintenance and Repair Management of the Generation Units of the Puerto Rico Electric Power Authority

Attachment A

Planned Maintenance and Critical Component Replacement Program.

GPR-PREB-NEPRMI20210014-20240226 #1

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

Response:

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

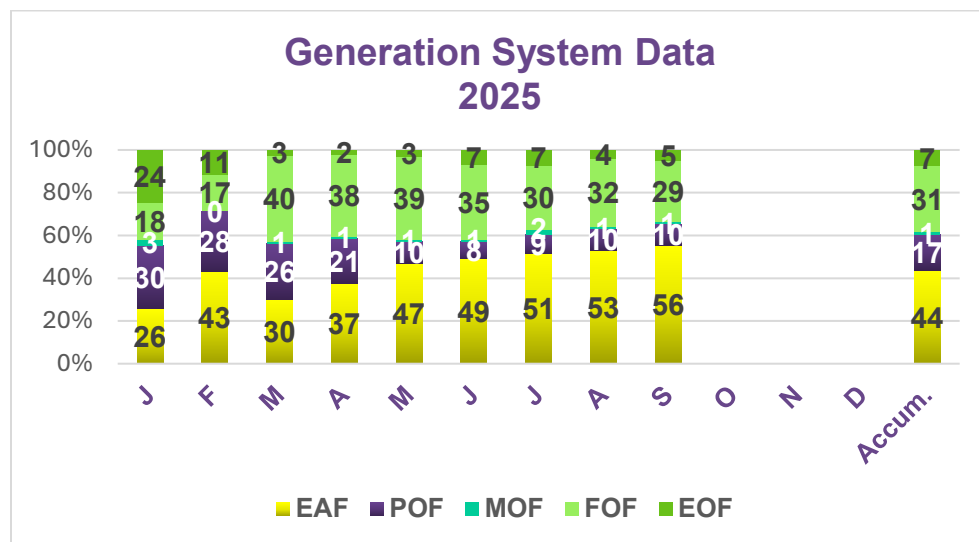
Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.

The Key improvements were the following:

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

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

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



Q2 Update:

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

Figure 2: Generation System Data of CY2025

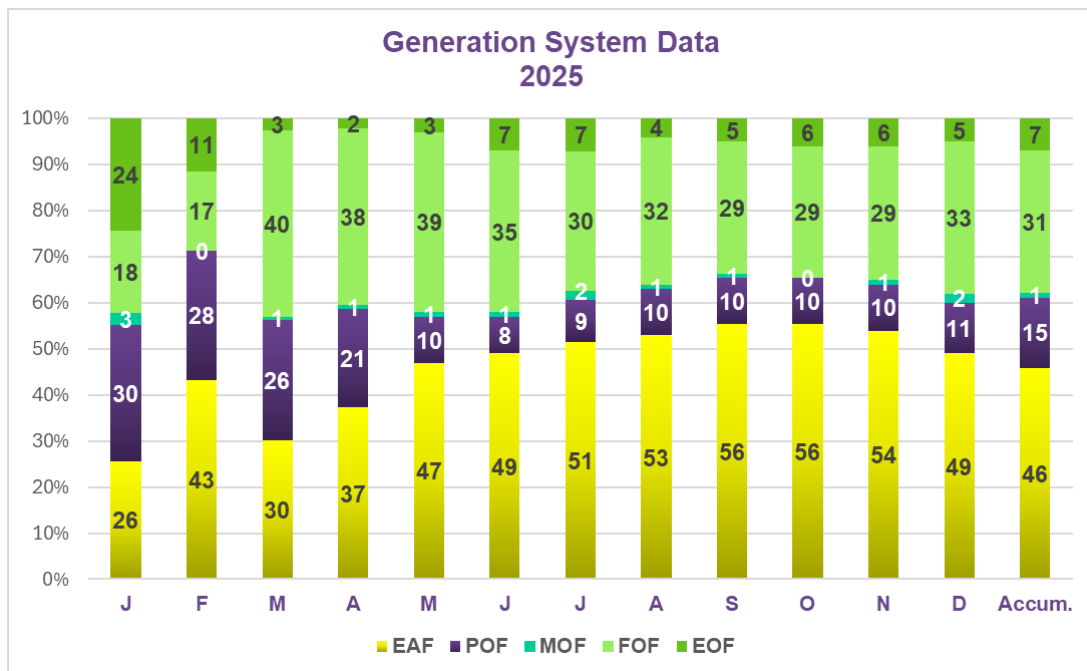
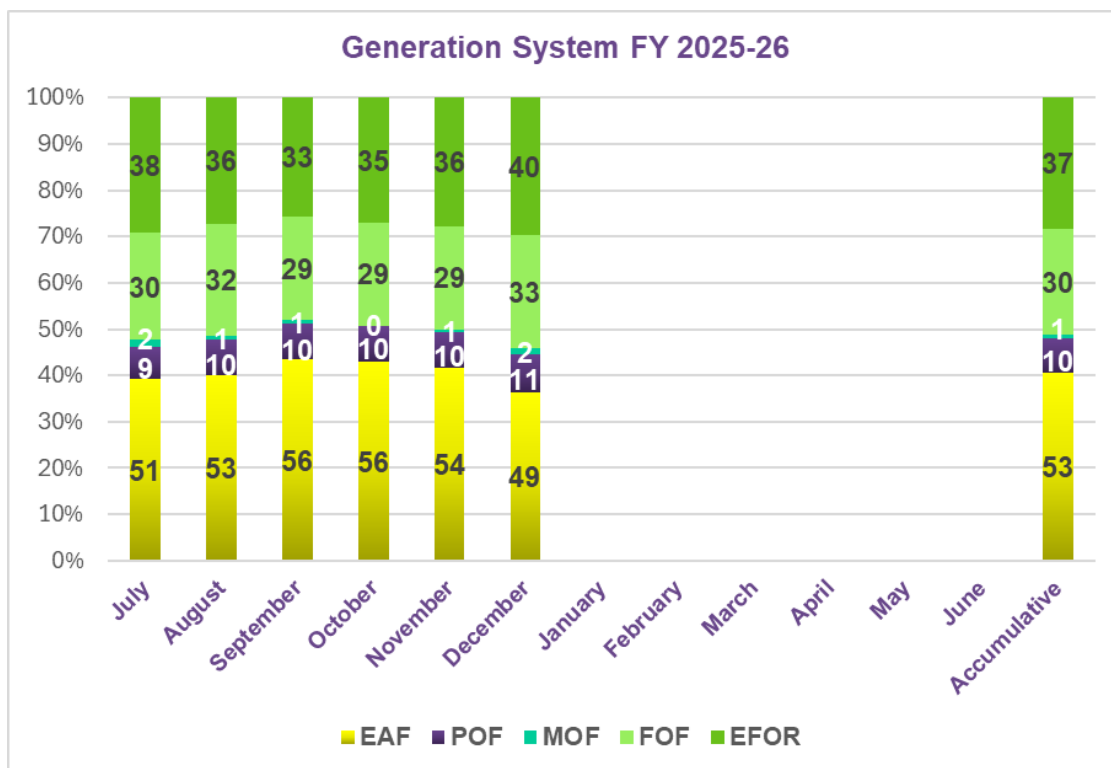
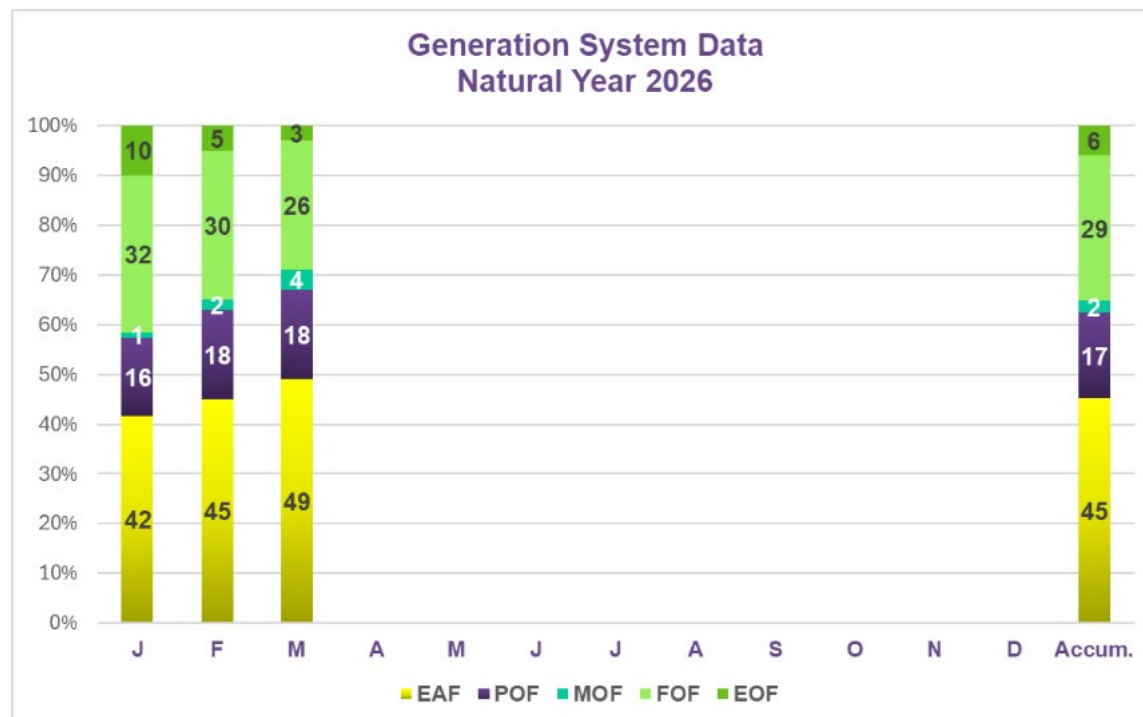


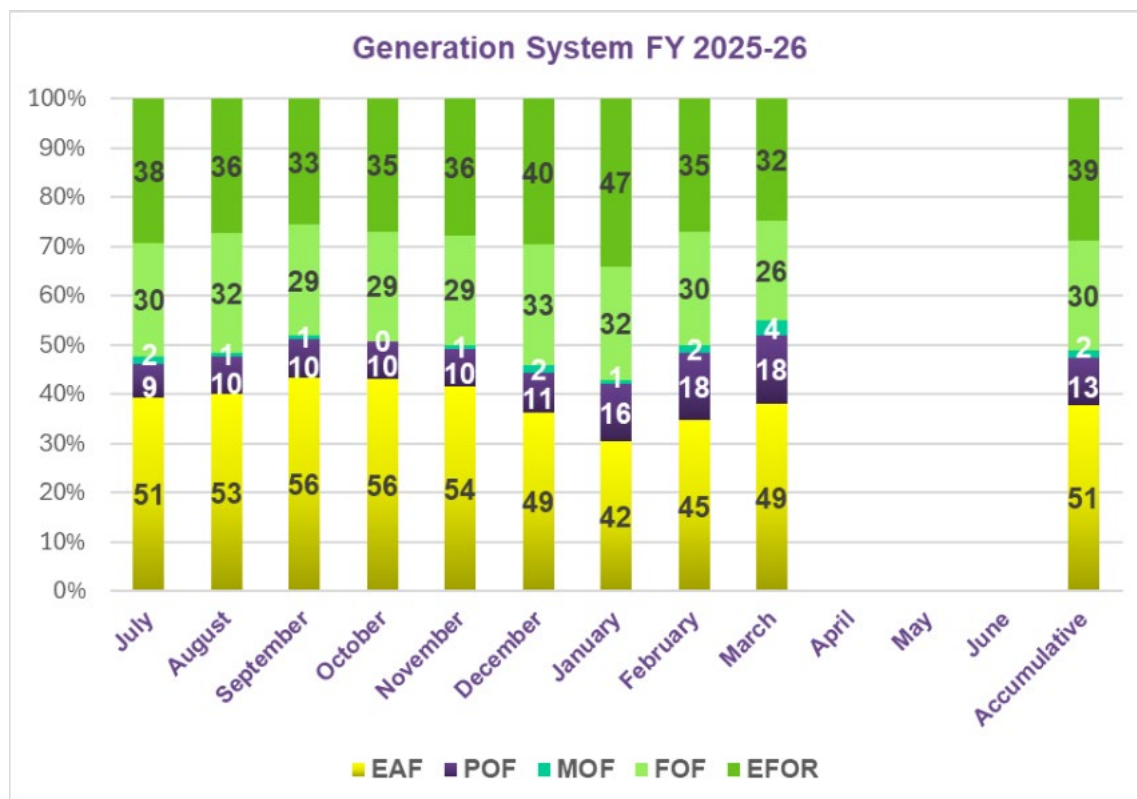
Figure 3: Generation System Data for Q1 and Q2 of FY2025



Q3 Update:

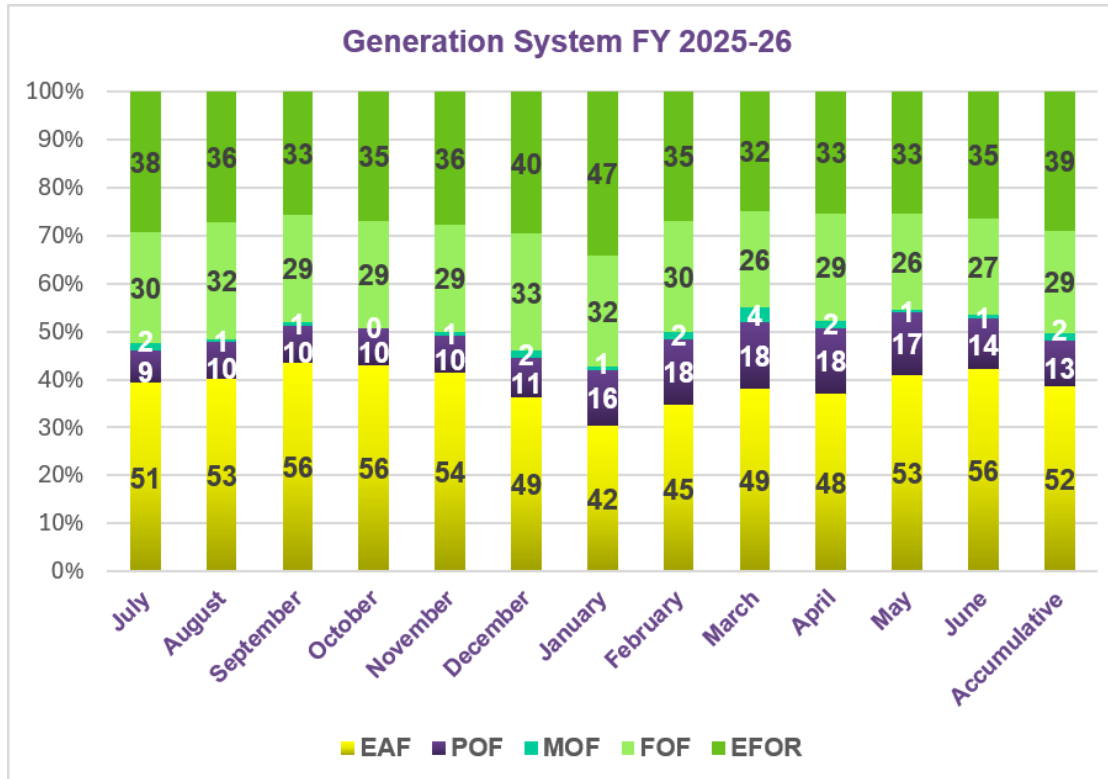
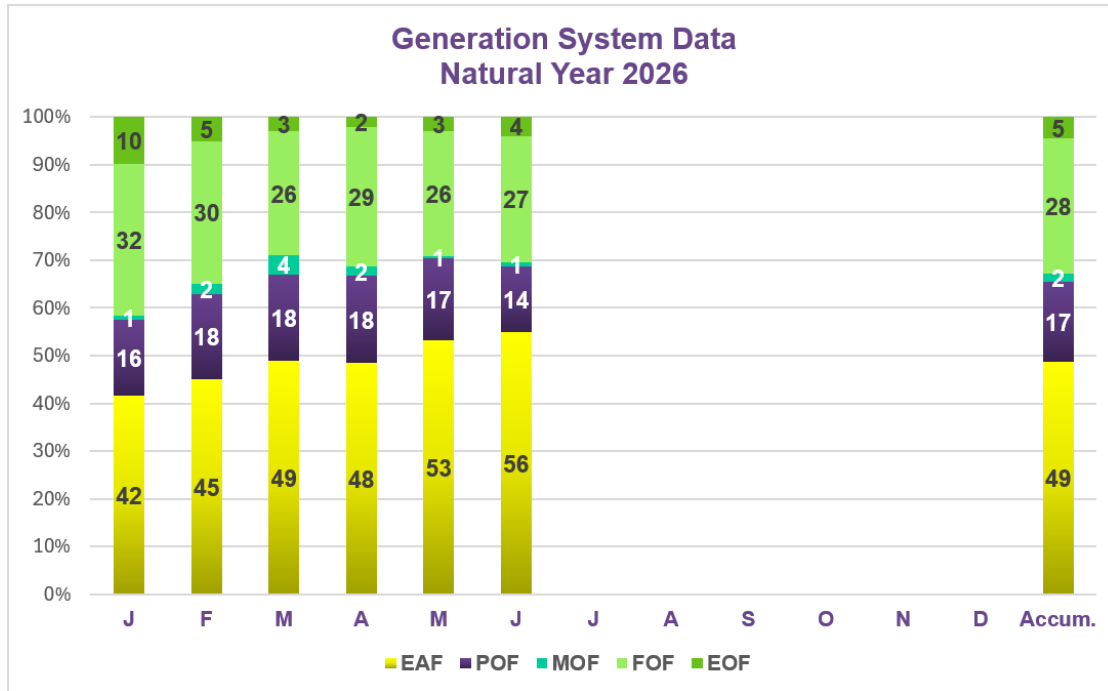
- Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.
- Aguirre Unit 2 had two forced outages for 196 hours in February due to boiler tube failures.
- Cambalache Unit 3 returned to service on March 10th after a major turbine repair. Due to this repair, the Forced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





Q4 Update:

- Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure.
- Aguirre Unit 2 had a forced outage factor of less than 10% throughout the quarter, compared to 54% in the previous fiscal year, representing a significant reduction in forced outages.
- Costa Sur 5 had a forced outage factor of 7.8%, representing a significantly low forced outage rate.
- San Juan 7 returned to service on June 27 following a major unit inspection.
- Palo Seco 3 returned to service on June 4 following an environmental maintenance outage.



GPR-PREB-NEPRMI20210014-20240226 #2

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

Response:

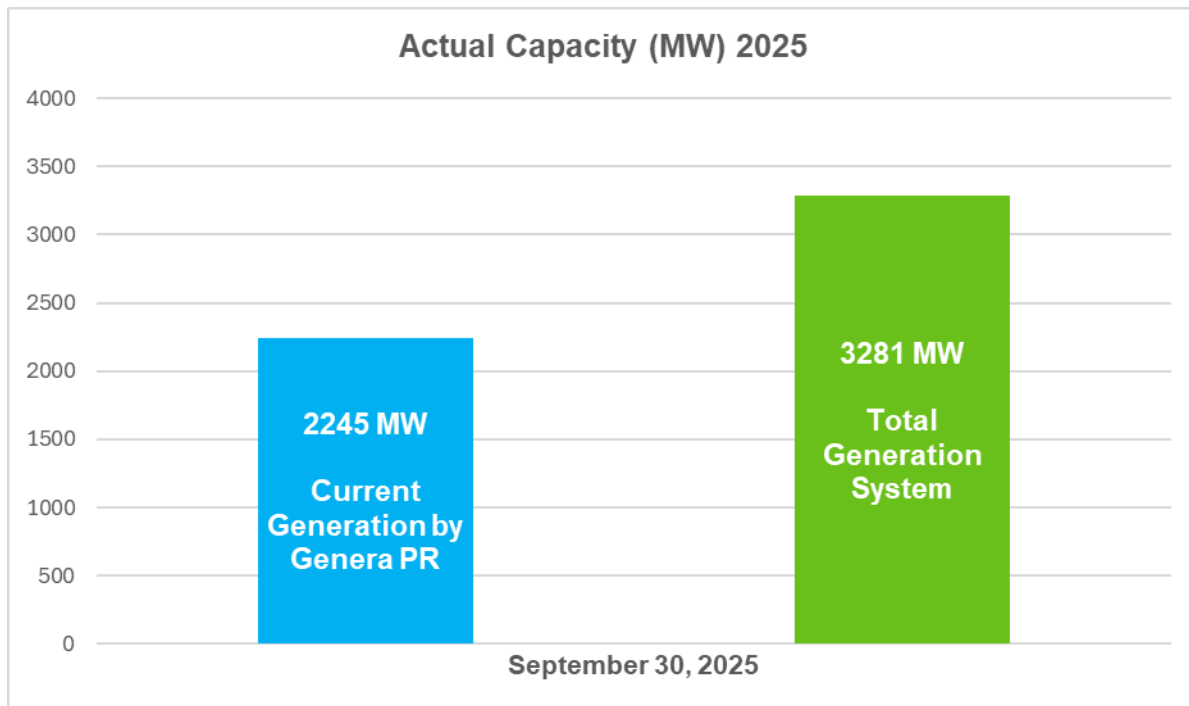
The EAF increased from 49% in June 2025 to 56% in September 2025, contributing to a reduction in load-shedding and improving overall unit availability.

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

Generation limitations during the period were as follows:

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

Figure 4: Actual Capacity of Q1 FY2025



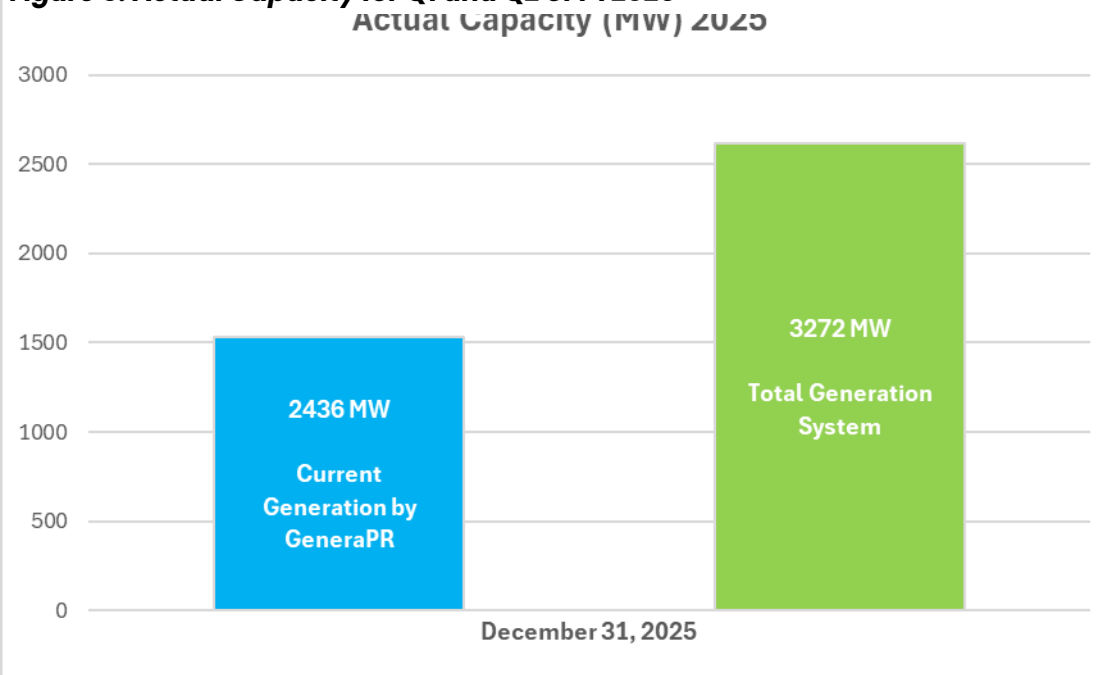
Q2 Update:

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

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

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

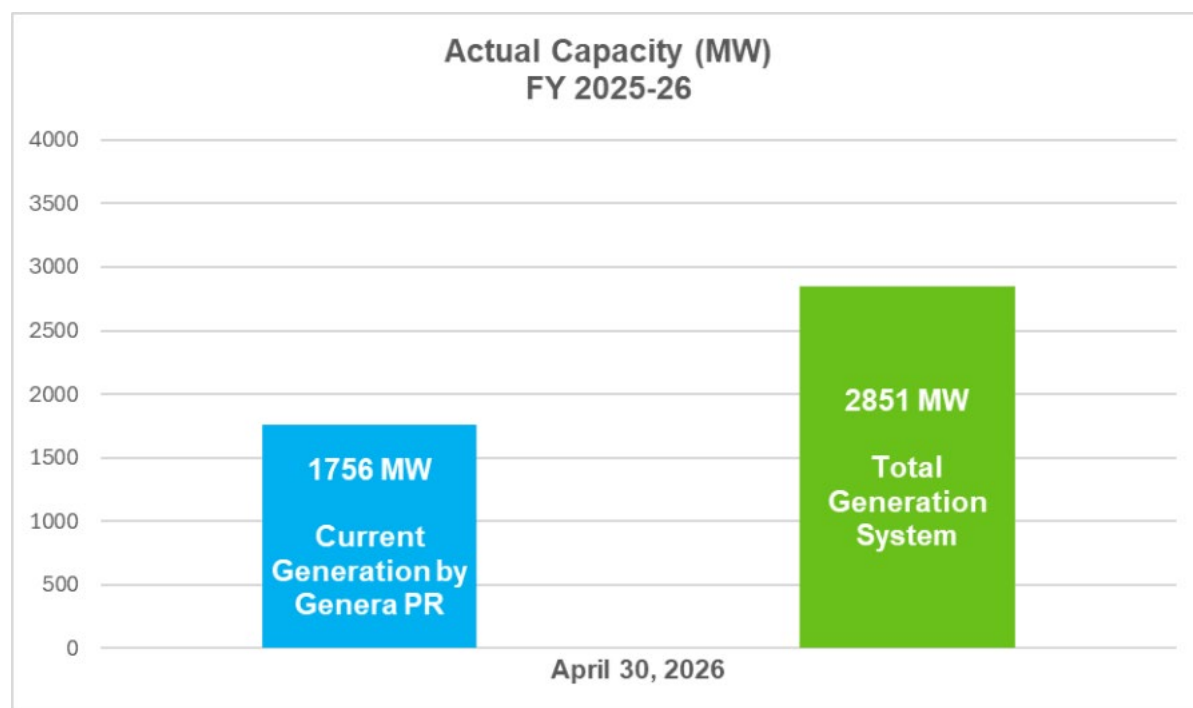
Figure 5: Actual Capacity for Q1 and Q2 of FY2025



Q3 Update:

- The cumulative EAF decreased from 53% in Q2 to 51% in Q3.
- Q3 is a lower-demand season; therefore, Genera performs scheduled maintenance activities in coordination with the electrical system operator, LUMA Energy.
- San Juan 6 was out of service throughout Q3 due to a scheduled outage for a turbine inspection, coordinated with LUMA Energy and the unit manufacturer, Mitsubishi, pursuant to the applicable Long-Term Service Agreement.
- San Juan 9 experienced maintenance outages during Q3, including 335 hours in January for repairs to a boiler IDF fan and 223 hours in February for boiler repairs.
- Palo Seco 3 was out of service beginning January 15 due to a scheduled outage conducted in compliance with EPA environmental requirements.

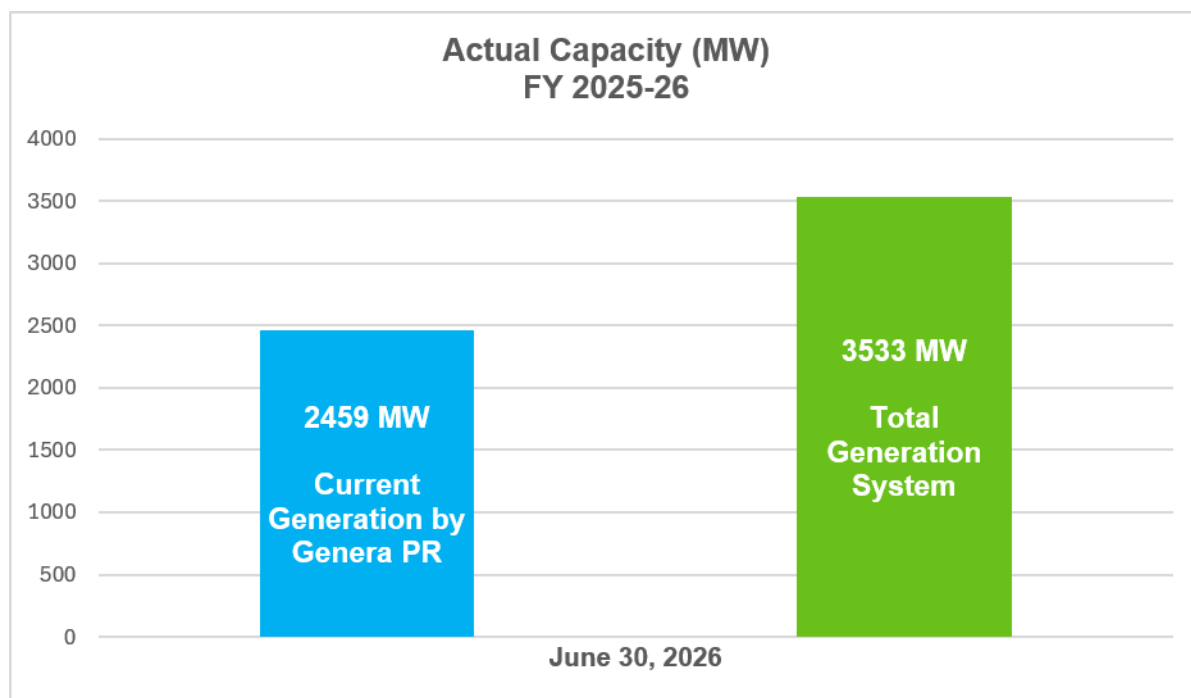
- Palo Seco 4 was out of service for 516 hours during March due to a maintenance outage to repair a hydrogen leak in the generator, in coordination with LUMA Energy. This work was scheduled during Q3 to coincide with lower seasonal electricity demand.



Q4 Update:

- The cumulative EAF increased from 51% in Q3 to 52% in Q4.
- Aguirre Unit 1 remained out of service throughout the quarter due to a generator failure, which negatively impacted the system-wide EAF. Genera awarded a contract to General Electric, the original equipment manufacturer (OEM), to perform the necessary generator repairs.

- The Costa Sur Steam Plant achieved an EAF of 87%, reflecting the positive impact of Genera's investment in the power plant.
- San Juan 6 was out of service throughout Q4 due to a scheduled outage for a turbine inspection, coordinated with LUMA Energy and the unit manufacturer, Mitsubishi, pursuant to the applicable Long-Term Service Agreement.
- San Juan 9 was taken out of service for a scheduled major repair.
- Palo Seco 3 returned to service on June 4 following a scheduled outage conducted in compliance with EPA environmental requirements.



GPR-PREB-NEPRMI20210014-20240226 #3

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

Response:

Key scheduled outages and delays during the first quarter include:

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

Q2 Update:

Key scheduled outages and delays during the second quarter include:

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

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

Q3 Update:

Key scheduled outages and delays during the third quarter include:

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

Q4 Update:

Key scheduled outages and delays during the fourth quarter include:

- Cambalache 2 was taken out of service for a scheduled combustion inspection, totaling 128 outage hours in June.
- San Juan 6 was out of service throughout Q4 due to a scheduled outage for a turbine inspection, coordinated with LUMA Energy and the unit manufacturer, Mitsubishi, pursuant to the applicable Long-Term Service Agreement.
- San Juan 7 returned to service on June 27 following a major unit inspection.
- San Juan 9 was taken out of service for a scheduled major repair.
- Palo Seco 3 returned to service on June 4 following an environmental maintenance outage.

GPR-PREB-NEPRMI20210014-20240226 #4

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

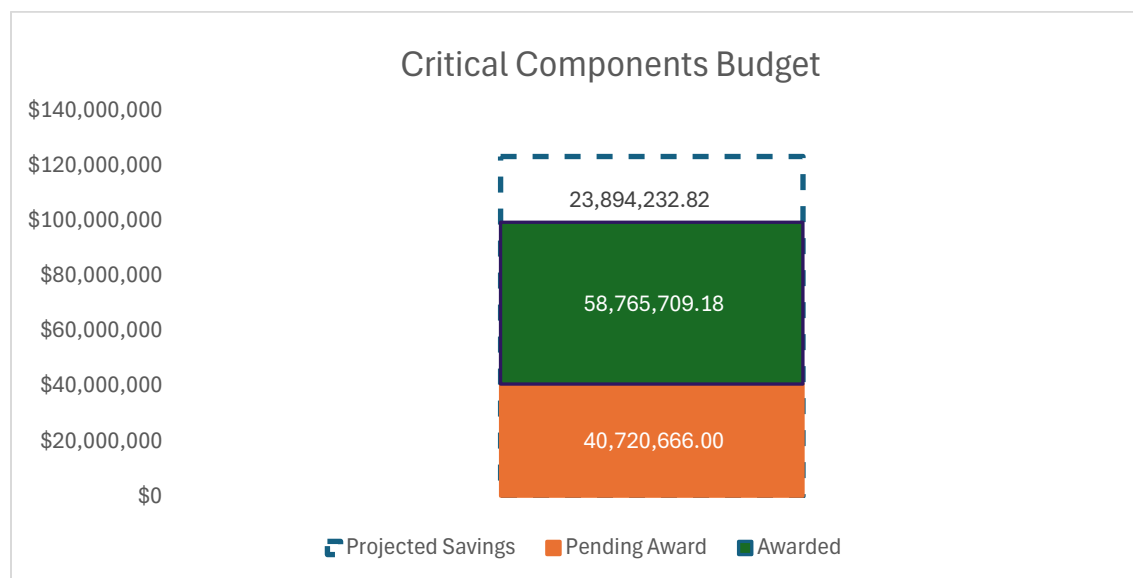
Response:

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

Q2 Update:

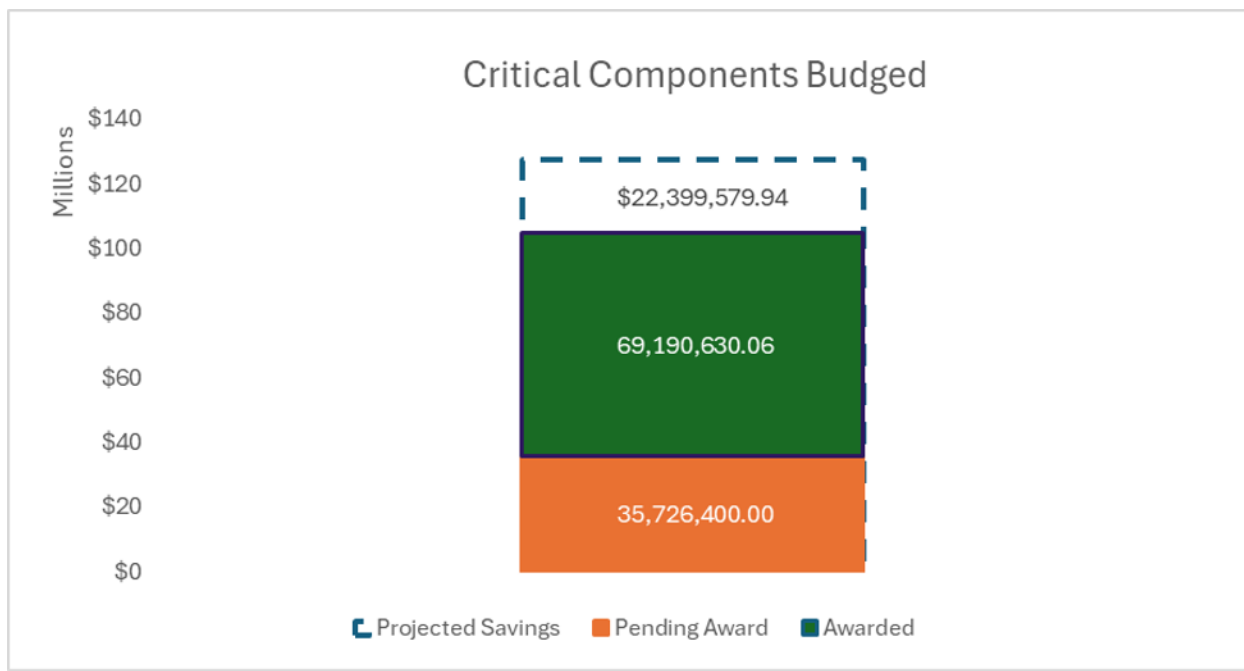
As shown in Figure 6 and detailed in Attachment GPR-PREB-NEPRMI20210014-20240226 #4, the total Critical Components Budget is approximately \$123.38 million. Of this amount, \$58,765,709.18 has been awarded, \$40,720,666.00 remains pending award, and projected savings total \$23,894,232.82.

Figure 6: Critical Components Budget



Q3 Update:

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



Q4 Update:

The total critical components budget is approximately \$127 million. Of this amount, \$80million has been awarded, \$24.4 million remains pending award, and projected savings total \$22,399,579.94.

GPR-PREB-NEPRMI20210014-20240226 #5

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

Response:

See attachments:

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

Q2 Update:

See attachments:

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

Q3 Update:

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

Q4 Update:

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

II. Consumables Spare Parts and Capital Spare Parts Inventory

C1. Genera Supply Chain

GPR-PREB-NEPRMI20210014-20240226 #C1

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

Response:

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

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continued strengthening its lean and agile supply chain strategy by enhancing warehouse operations, inventory visibility, and material management processes across all generation facilities. Power BI dashboards remain fully operational, providing real-time reporting and supporting informed decision-making for inventory management and warehouse operations. Continuous improvements to Asset Suite reporting and warehouse processes have further strengthened operational efficiency and inventory control in accordance with prudent utility practices.

C2. Reliability Centered Management Program

GPR-PREB-NEPRMI20210014-20240226 #C2

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

Response:

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

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

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

The IT Department continues enhancing Asset Suite by expanding process automation, KPI reporting, and maintenance tracking capabilities. These improvements support the Reliability Centered Management Program by strengthening the planning, scheduling, and monitoring of preventive, predictive, and corrective maintenance activities, while improving inventory management and warehouse operations.

C3. Managing Obsolete Parts

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

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

a. 6 months

i. Status of the detailed inventory audit.

Response:

All obsolete material and listing are located at Aguirre warehouse.

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues to maintain the obsolete materials at the dedicated warehouse located at the Aguirre Power Plant. During Q4, Genera has been evaluating the applicable procedures and requirements for the eventual disposition of these materials. No disposition process has been initiated at this time, and no approvals from PREPA, PREB, or P3A are currently pending.

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

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

Response:

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

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

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Power BI and Asset Suite continue to support inventory management by providing real-time visibility into material usage, inventory levels, and procurement activities. These tools assist in identifying redundant inventory, optimizing stock levels, and supporting decisions related to the potential removal of obsolete materials, while promoting more efficient warehouse and procurement operations.

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

i. Division of warehouse inventory into the identified categories.

Response:

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

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

Q2 Update:

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

Q3 Update:

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

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

Q4 Update:

Genera continues refining inventory category classifications within the inventory management system to improve material organization and support warehouse operations. Genera continues to maintain the obsolete materials at the dedicated warehouse located at the Aguirre Power Plant. During Q4, Genera has been evaluating the applicable procedures and requirements for the eventual disposition of these materials. No disposition process has been initiated at this time, and no approvals from PREPA, PREB, or P3A are currently pending. Inventory records and category classifications continue to be updated to support effective inventory management and prudent utility practices.

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

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

Response:

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

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

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

Q2 Update:

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

Q3 Update:

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

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

Q4 Update:

Power BI and Asset Suite continue to support demand forecasting for spare parts, equipment, and consumables by providing real-time inventory data, material usage trends, and procurement information. These tools assist Warehouse, Procurement, and Operations in planning maintenance activities, optimizing inventory levels, and ensuring the timely availability of materials to support reliable plant operations.

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

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

Response:

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

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

Q2 Update:

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

Q3 Update:

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

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

Q4 Update:

During this Quarter, warehouse personnel continued updating stock catalogs, standardizing material descriptions, and refining inventory classifications within Asset Suite. These activities support the future implementation of automatic requisition functionality by ensuring that minimum stock levels, item categories, and inventory records are properly configured for system-driven replenishment.

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

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

Response:

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

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

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

Q2 Update:

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

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

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

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

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

Q3 Update:

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

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

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

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

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

Q4 Update:

During Q4, Genera continued advancing the assessment and identification of replacement parts required to support the Legacy Generation Assets, with Procurement, Warehouse, and Plant Operations maintaining close coordination to validate material requirements for planned maintenance activities and operational reliability. Inventory reviews and demand forecasting continued to be refined using historical consumption trends and updated maintenance schedules to support proactive procurement planning.

Procurement continued executing sourcing strategies with existing suppliers while evaluating opportunities to improve lead times, pricing, and material availability for critical replacement parts. Supplier engagement remained focused on ensuring production capacity, delivery performance, and timely response to operational requirements.

Throughout the quarter, Genera continued strengthening its procurement and inventory management processes by enhancing coordination between material planning, supplier management, and inventory control. These efforts supported improved visibility into replacement part requirements, increased supply chain resilience, and the continued availability of critical materials necessary to support the reliable operation of the Legacy Generation Assets.

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

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

Response:

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

Q2 Update:

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

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

Q3 Update:

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

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

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

Q4 Update:

During Q4, Genera continued expanding and diversifying its supplier base to strengthen sourcing alternatives for existing replacement parts. Between November and January, twenty-five (25) new suppliers were registered, further increasing sourcing flexibility, improving access to alternative replacement components, and enhancing supply chain resilience in support of the Legacy Generation Assets.

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

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

Response:

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

Q2 Update:

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

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

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

Q3 Update:

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

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

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

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

Q4 Update:

During Q4, Genera continued monitoring procurement activities against approved estimates and budgets to support cost control across all categories. Procurement orders continued to be managed within the established estimated amounts and approved budget parameters, supporting the organization's ongoing cost-saving and expenditure control objectives.

C4. Obtaining Best Part Price

GPR-PREB-NEPRMI20210014-20240226-ATTA #C4

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

Response:

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

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

Q2 Update:

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

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

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

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

Q3 Update:

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

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

Q4 Update:

During Q4, Genera continued leveraging competitive bidding and its expanded supplier network to support the “best quality part fit” and “best part price” objective. Procurement continued working closely with Plant Operations and other technical stakeholders to evaluate bids based on both commercial competitiveness and technical compliance, helping ensure that purchasing decisions considered not only price, but also compatibility, quality, delivery requirements, and operational needs.

The continued expansion and diversification of Genera’s supplier network further supported these efforts by increasing sourcing alternatives, strengthening price benchmarking and negotiation opportunities, and reducing reliance on limited sourcing options. These practices continue to promote competitive pricing while supporting the selection of technically suitable parts for the Legacy Generation Assets.

C5. Spares Quality Assurance Program

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

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

Response Q3:

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

Q4 Update:

Genera has advanced the development and implementation of the Purchased Material Inspection (PMI) Program, establishing the foundational elements necessary for a compliant, auditable, and operationally effective quality assurance process for critical spare parts. With the completion of the Asset Suite system separation from LUMA and full governance now under Genera's IT-OT organization, the PMI Program has transitioned from initial design to active implementation across the inventory and maintenance management functions.

Key progress includes the identification and classification of critical components, structured field data collection, and the creation of catalog records in Asset Suite to support traceability, inspection documentation, and Bill of Materials integration. Warehouse Operations and Maintenance Directors have collaborated to develop standardized inspection sheets that define technical acceptance criteria for each critical component. These inspection sheets are now incorporated into purchase technical specifications, ensuring suppliers are fully informed of inspection requirements before delivery.

Additionally, Quality Control inspection workflows have been formalized using Asset Suite's mandatory QC hold and inspection procedures, strengthening material acceptance controls and increasing consistency across plants. This enhances Genera's ability to validate incoming materials, identify discrepancies, and ensure compliance with preventive and predictive maintenance standards.

Overall, the PMI Program is now in the stage of implementation. The detailed technical description, full process breakdown, and CMMS/EAM integration mechanics are provided comprehensively in response GPR – PREB – NEPRMI20210014 – 20240226 – ATTA #C5(b), which should be consulted for the complete operational and system level detail supporting this summary.

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

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

Response Q3:

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

Q4 Update:**Purchase Material Inspection (PMI) Plan for Critical Components in Inventory**

(Updated to reflect full governance of Asset Suite under Genera)

Introduction

To successfully implement the PMI program, Genera will manage the initiative as a formal, cross- functional project. The implementation plan requires close coordination between IT-OT, Asset Suite administrators, Warehouse Operations, and Maintenance Directors. IT-OT and Asset Suite teams are responsible for system security, configuration, and process integration. Warehouse personnel will review and approve configuration scripts and validate the new operational workflows. Maintenance Directors will provide standardized inspection templates that must be incorporated into purchase specifications, so suppliers understand the inspection requirements applicable to all critical components. This project driven structure ensures compliance with regulatory expectations, strengthens material acceptance controls, and supports continuous improvement across the generation fleet.

PMI Program Plan (Updated)

Project Background

Genera has successfully completed the information systems separation project from LUMA, including the migration of Hitachi Energy Asset Suite (EAM) to a fully governed Genera's-controlled instance within Azure, and the transition of Oracle EBS to Oracle Cloud. The PMI program builds on these systems to support PREB compliance and to enhance reliability and traceability within the generation fleet.

PMI Program Objectives

- Implement a robust PMI program for critical components impacting generation fleet reliability.
- Comply with PREB requirements for an auditable and traceable PMI program within the EAM system.

Strengthen inventory accuracy, inspection rigor, and documentation quality for material acceptance.

PMI Program Implementation

Phase 1: System Preparation — *Completed*

With the separation from LUMA finalized, Genera now operates under full governance of the Enterprise Asset Management (EAM) platform. Genera holds its own licenses, and all administration, configuration, security, and change control responsibilities for Asset Suite are fully managed by the IT-OT organization.

This completed phase establishes a stable technical foundation for the PMI Program. IT-OT now ensures:

- System integrity and controlled configuration management
- Role-based access control and cybersecurity alignment

- Functional readiness for catalog management, critical-component tracking, and PMI workflows

With complete governance, subsequent phases focus on expanding data quality, catalog functionality, inspection requirements, and operational compliance.

Phase 2: Critical Component Data Management

2.1 Field Data Collection Prior to Accounting Configuration

Because Asset Suite is now fully governed by Genera, the process of establishing critical component records begins with Genera collecting field-level technical data for each critical component. This includes:

- Component technical specifications
- Manufacturer information
- Operational criticality
- Expected inspection criteria
- Supporting drawings and documents

2.2 Submission to Asset Suite Personnel for Catalog Preparation

The collected field data is delivered to Asset Suite personnel, who configure an environment where critical components can be entered as warehouse catalog items. This provides:

- A structured location for PMI procedures
- A formal catalog ID for spare part traceability
- The foundation for BOM integration and maintenance planning

2.3 Maintenance Inspection Sheet Requirement

Maintenance Directors will produce inspection sheets for each critical component. These sheets:

- Define inspection criteria to be applied upon warehouse receipt
- Standardize quality expectations across plants

- Serve as official PMI documentation for acceptance or rejection

These inspection sheets must be incorporated into purchase technical specifications, ensuring that suppliers understand the inspection requirements applicable to all delivered components.

2.4 Creation or Update of Equipment Hierarchy

- Identify critical components with existing EAM equipment records
- Add missing equipment records where required
- Configure BOMs to properly associate critical components with equipment assets

Phase 3: PMI Program Configuration

- Review the master inventory catalog to identify and classify critical components
- Develop inspection procedures for receiving critical components
- Integrate inspection procedures into CMMS Standards Documents
- Attach all relevant technical specifications, drawings, and pictures to the critical component records in the EAM system

Phase 4: Quality Control Inspection Overview

4.1 QC Records and Control Pages

QC records are created by receiving or return transactions and are managed exclusively through the I030 series of QC pages.

4.2 Inspection Review

QC Inspectors review the QC Inspection Hold Report for traceable and non-traceable items, confirming:

- Conformance with purchase orders
- Quantity accuracy
- Acceptance, QC hold, temporary release, or rejection

- Any overshort damaged discrepant (OSD&D) conditions

4.3 Documentation of Results

The I033 QC Inspection Procedures page displays inspection descriptions, instructions, notes, and comments for formal documentation.

4.4 Material Disposition

Inspection must be completed and passed prior to any disposition, including:

- Warehouse put away
- Issue for priority maintenance
- Return processing for OSD&D cases

4.5 Receiving Process via Asset Suite

The receiving workflow includes inspection at the purchase-order and catalog-ID level, supported by the Asset Suite process flow.

Phase 5: Rollout and Training

- Train relevant personnel on updated PMI workflows and system functionalities
- Conduct end-to-end testing of the PMI program
- Validate catalog integration, QC transactions, and inspection documentation

Phase 6: Continuous Improvement

- Maintain ongoing review and updating of critical component data and inspection sheets
- Periodically audit PMI compliance and data accuracy
- Update technical specifications and catalog records as needed

Benefits

- Improved reliability of the generation fleet
- Strengthened receiving, inspection, and acceptance controls

- Better inventory management and traceability
- Alignment with PREB regulatory requirements
- Appropriate accounting treatment and depreciation tracking for critical components

Success Factors

- Strong coordination between IT-OT, Inventory, Plant Maintenance, and Finance
- High-quality field data collection and inspection documentation
- Effective user training and ongoing support

C6. Warehouse Management Software

GPR-PREB-NEPRMI20210014- 20240226-ATTA #C6

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues utilizing Asset Suite as its Enterprise Asset Management (EAM) platform, integrated with Power BI to support maintenance, warehouse, and procurement operations. The combined systems provide real-time visibility into inventory, material movements, purchase order status, and

maintenance activities, improving operational efficiency and supporting informed decision-making. The IT Department continues to enhance Asset Suite functionality to meet Genera's operational requirements.

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

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

Response:

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

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

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

Q2 Update:

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

Q3 Update:

The Operations, Warehouse, and Procurement Departments continue integrating inventory data through Asset Suite and Power BI reporting tools to enhance warehouse management and inventory control. These systems support the tracking, forecasting, and expedited procurement of critical parts,

particularly for zero-stock inventory items, helping minimize delays in maintenance activities and unit repairs.

Q4 Update:

The Operations, Warehouse, and Procurement Departments continue utilizing Asset Suite and Power BI to identify and expedite the procurement of critical parts with zero stock quantities. Ongoing coordination with suppliers and routine inventory monitoring support timely replenishment of critical materials, reducing procurement lead times and minimizing potential impacts on maintenance activities and plant reliability.

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

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

Response:

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

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

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues monitoring critical parts with zero stock through Asset Suite and Power BI to prioritize procurement and maintain material availability for planned and corrective maintenance activities. Coordination between the Warehouse, Procurement, and Operations Departments supports timely replenishment of critical inventory, while Master Service Agreements continue to facilitate the expedited acquisition of essential materials when required.

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

The Operations, Warehouse, and Procurement Departments continue utilizing Asset Suite and Power BI to identify and expedite the procurement of major and minor parts with zero stock quantities. Ongoing inventory monitoring, supplier coordination, and procurement planning support timely replenishment of materials, helping reduce procurement lead times and ensure the availability of parts required for maintenance and daily operations.

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

The Operations, Warehouse, and Procurement Departments continue utilizing Asset Suite and Power BI to identify major and minor parts with zero stock quantities and prioritize their replenishment. Ongoing coordination with suppliers and routine inventory reviews support the reduction of zero-stock

conditions and help maintain adequate inventory levels to support maintenance activities and reliable plant operations.

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

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

Response:

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

Q2 Update:

No update. See Q1 response.

Q3 Update:

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

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

Q4 Update:

During Q4, Genera continued strengthening its proactive approach to managing critical parts with extended lead times. Procurement, Warehouse, and Plant Operations maintained ongoing coordination to identify critical

material requirements in advance, monitor inventory availability, and prioritize sourcing activities based on operational needs and anticipated delivery timelines.

Lead time continued to be considered a key factor in supplier evaluations and procurement planning, particularly for critical and time-sensitive components. Where applicable, alternative suppliers and sourcing options were evaluated to mitigate potential supply constraints and reduce dependency on limited sources.

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

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

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

c. Describe the effectiveness of procurement procedures.

Response:

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

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

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

Q2 Update:

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

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

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

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

Q3 Update:

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

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

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

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

Q4 Update:

During Q4, Genera continued strengthening the effectiveness of its procurement procedures through consistent application of established competitive sourcing, evaluation, approval, and compliance requirements.

Procurement activities are conducted in accordance with applicable internal policies, regulatory requirements, and established approval controls, supporting transparency and accountability throughout the procurement lifecycle.

Cross-functional coordination among Procurement, Operations, Warehouse, Legal, and other stakeholders continued to support timely evaluation of technical, commercial, and operational requirements. Competitive bidding and supplier diversification remained key components of the sourcing process, supporting market competition and informed award decisions.

Genera also continued implementing process improvements aimed at increasing efficiency, strengthening documentation and controls, and improving visibility throughout the procurement process. These efforts continue to support an effective procurement framework focused on compliance, competitive sourcing, operational requirements, and responsible cost management.

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

The Warehouse and Procurement Departments continue using Asset Suite and Power BI to monitor long lead time spare parts and support timely procurement planning. Coordination with Operations and ICM personnel ensures that critical materials are identified in advance of scheduled maintenance activities, reducing procurement risks and improving material availability for planned and corrective maintenance.

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

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

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

Response:**Long-Term Agreements:**

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

Blanket Purchase Orders (BPOs):

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

Vendor-Managed Inventory (VMI):

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

Q2 Update:

No update.

Q3 Update:

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

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

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

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

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

Q4 Update:

During Q4, Genera continued advancing its multi-faceted procurement and inventory management approach to strengthen material availability, sourcing flexibility, and operational readiness across the Legacy Generation Assets. During Q4, the approach remained focused on leveraging established tools, while evaluating additional opportunities to improve supplier responsiveness, material availability, inventory efficiency, and supply chain resilience.

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

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera is attaching the current preliminary Unit Maintenance Plan for Boilers and Turbo Generators¹. The schedule remains subject to further coordination and has not been formally approved or finalized by LUMA. Accordingly, the attached plan should not be considered a final or firm maintenance schedule, and the proposed dates may be adjusted as coordination progresses.

To support proactive planning and maintain an updated maintenance schedule, Genera and LUMA have established monthly coordination meetings to review the Unit Maintenance Plan, discuss operational and system considerations, and evaluate any necessary adjustments. Genera will continue coordinating with LUMA through these meetings toward the development and approval of a final maintenance schedule.

¹ Please refer to attachment GPR-PREB-NEPRMI20210014-20240226-ATTA #C13(a).

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

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

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Power BI and Asset Suite continue to improve the accuracy of work packages by providing real-time visibility into inventory availability, warehouse locations, and material status. Coordination among Warehouse, Procurement, Engineering, and Operations continues to support accurate planning and ensure the timely availability of parts and equipment required for scheduled maintenance activities

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

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues utilizing dedicated inventory personnel to perform ongoing inventory audits across all warehouse facilities. Daily inventory reports and variance reviews support the timely identification and correction of

discrepancies, strengthening inventory record accuracy and improving overall warehouse inventory controls.

C 15. Incomplete inventory information

GPR-PREB-NEPRMI20210014-20240226-ATTA #C15

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Warehouse supervisors continue creating and maintaining stock item records in Asset Suite in accordance with internal review and validation procedures. Ongoing efforts to standardize material descriptions and validate inventory data continue to improve the completeness and accuracy of unit cost, stock quantities, required quantities, and other critical inventory information within the system.

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

Provide status on:

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

Response:

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

Q2 Update:

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

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

Q3 Update:

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

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

Q4 Update:

Warehouse supervisors continue coordinating with Operations, ICM and Procurement departments to maintain the availability of critical materials required for planned and corrective maintenance activities. Asset Suite and Power BI are used to monitor inventory levels, evaluate alternative sourcing options when needed, and support outage planning through material forecasting and resource coordination. These efforts continue to reduce the risk of critical stock shortages and support the reliable operation of Genera's generation fleet.

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

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

Response:

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

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

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

Q2 Update:

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

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

Q3 Update:

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

Q4 Update:

Genera continues utilizing Asset Suite and Power BI to monitor critical spare parts, validate inventory parameters, and identify long lead-time components requiring advance procurement. Warehouse, Procurement, and Operations departments continue coordinating to maintain material readiness through supplier engagement, inventory planning, and alternative sourcing strategies, strengthening Genera's preparedness to respond to critical turbine failures and support reliable fleet operations.

C18. Benchmarks for Critical Spare Parts**GPR-PREB-NEPRMI20210014-20240226-ATTA #C18(a)**

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

Response:

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues strengthening the availability of critical spare parts through ongoing coordination with vendors, Operations, and Procurement. Asset Suite and Power BI are used to monitor inventory levels, support replenishment planning, and improve visibility of critical materials, helping ensure spare parts remain available to support maintenance activities and reliable plant operations.

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

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

Response:

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

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

Q2 Update:

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

Q3 Update:

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

Q4 Update:

Genera continues utilizing Asset Suite and Power BI to monitor inventory levels and identify critical and major parts requiring replenishment. Warehouse supervisors regularly review inventory reports and coordinate with Procurement and Operations to ensure adequate stock levels are maintained. Ongoing inventory verification activities continue to support the accuracy of inventory records and the timely replenishment of critical materials.

Attachments to GPR-PREB-NEPRMI20210014-20240226 #5

- GPR-PREB-NEPRMI20210014-20240226 #5 – April 2026
- GPR-PREB-NEPRMI20210014-20240226 #5 – May 2026
- GPR-PREB-NEPRMI20210014-20240226 #5 – June 2026

April 2026					
Unit	Description	Date Out	Date In	Duration (Hrs)	Corrective Action
Aguirre 2	Unit tripped due to loss of condenser vacuum - Vacuum Pump 2-1 coupling failure.	12-Apr-2026	12-Apr-2026	2.60	Unit was returned to service limited to 20MW due to low condenser operating vacuum conditions.
Aguirre 2	Unit tripped due to loss of condenser vacuum - Vacuum Pump 2-1 operating issues.	13-Apr-2026	13-Apr-2026	2.55	Vacuump Pump 2-1 was troubleshootted in order to normalize the main condenser vacuum operating conditions.
Aguirre CC 2-1	Trip unit by fuel control.	1-Apr-2026	2-Apr-2026	22.40	Changed the TCQC board, which had low voltage and did not reach the fuel bypass valve control (LVDT). From the terminal block (QTBA), all cables associated with the natrual gas system were removed.
Aguirre CC 2-1	Trip unit by fuel control.	6-Apr-2026	7-Apr-2026	17.30	Changed the solenoid of the fuel bypass valve. Finished removing the cables associated with natural gas on the terminal block (QTBA).
Aguirre CC 2-1	Trip unit by fuel control.	7-Apr-2026	8-Apr-2026	18.70	Changed the solenoid block.
Aguirre CC 2-1	Trip unit by fuel control.	8-Apr-2026	8-Apr-2026	1.90	Disconnected RVDT #1 from the inlet guide vanes that was affecting the circuit.
Daguao 1-1	Circuit breaker 0010 opened.	18-Apr-2026	19-Apr-2026	37.80	Luma staff reset breaker and closed it.
Daguao 1-1	Ground fault main power transformer. Water ingress in connection box.	22-Apr-2026	24-Apr-2026	53.15	Cleaned, painted and replaced lid gasket preventive maintenace was performed.
Daguao 1-1	Tripped due to fuel flow divider issues.	30-Apr-2026	30-Apr-2026	0.47	Calibrate and Master reset.
Daguao 1-2	Ground fault main power transformer. Water ingress in connection box.	22-Apr-2026	24-Apr-2026	53.15	Cleaning, Painting and replaced cover gasket.
Daguao 1-2	Circuit breaker 0010 opened.	18-Apr-2026	19-Apr-2026	37.80	Luma staff reset breaker and closed.
Mayaguez 2A	Unit trip due a erratic pressure differential in a scavange line.	28-Apr-2026	30-Apr-2026	52.62	Unit 2A was disengaged in order to have online 2B.
Mayaguez 2B	Because Unit 2A PT621 trip. Unit 2B can't be online due to a high oil leak on 2A.	28-Apr-2026	30-Apr-2026	24.10	Unit 2A decoupled to keep Unit 2B available.
Mayaguez 3A	Unit was out due to a flame trip.	6-Apr-2026	6-Apr-2026	3.20	A software reset was made.
Mayaguez 4A	The unit exhibited a back pressure issue. This is typically caused by the fuel injection system, water injection system, or bleed valves that may or may not have opened at a specific point in time. A trendline analysis was performed to graphically identify the problem, and no discrepancies were found.	11-Apr-2026	30-Apr-2026	460.03	The data was sent to Mitsubishi. They instructed to calibrate the pressure transmitters and temperature sensors (TE). The process was been completed, and we are pending approval from Mitsubishi. Also, a boroscope inspection was made.
Mayaguez 4B	Unit trip due to a no light.	6-Apr-2026	7-Apr-2026	24.10	A replacement of the igniters was made.
Mayaguez 4B	The secondary fans located in the pump compartments have failed.	10-Apr-2026	10-Apr-2026	0.25	A software reset was made.
Mayaguez 4B	Because Unit A was under a boroscope inspection, unit B was not available.	14-Apr-2026	14-Apr-2026	7.70	Because Unit A was under a boroscope inspection, unit B was not available.
Mayaguez 4B	Because Unit A was under a boroscope inspection, unit B was not available.	15-Apr-2026	15-Apr-2026	8.93	Because Unit A was under a boroscope inspection, unit B was not available.
Mayaguez 4B	Unit 4A was under a pressure transmitter and temperature sensor calibration. Therefore Unit 4B was out.	22-Apr-2026	22-Apr-2026	0.52	Pressure transmitter and temperature sensor calibrated.
Mayaguez 4B	Unit out of service due to a permissive alarm on 4A. The alarm is related to metal and carbon particles in the filters and chip detectors.	28-Apr-2026	29-Apr-2026	17.28	Unit 4A was disengaged in order to have unit 4B online.
Costa Sur 5	Platen superheater issue.	11-Apr-2026	15-Apr-2026	95.89	Boiler repaired, hydrostatic performed and unit synchronized.
Costa Sur 5	Rotor collector rings issue.	15-Apr-2026	15-Apr-2026	12.30	Brush holder area cleaning performed and unit synchronized.
Costa Sur 6	Main stop valves issue.	20-Apr-2026	30-Apr-2026	247.30	Pending repair of main steam inlet valves to the turbine.
San Juan TM 2	Node fault.	28-Apr-2026	30-Apr-2026	53.48	System cleaned.
San Juan TM 2	Node fault.	2-Apr-2026	2-Apr-2026	1.35	System cleaned.
San Juan TM 2	Regas working relief valve.	25-Apr-2026	25-Apr-2026	2.60	Regas finished work.
San Juan TM 2	Node fault.	28-Apr-2026	28-Apr-2026	0.73	System cleaned.
San Juan TM 3	Regas working relief valve.	25-Apr-2026	25-Apr-2026	2.60	Regas finished work.
San Juan TM 4	Regas working relief valve.	25-Apr-2026	25-Apr-2026	2.60	Regas finished work.
San Juan TM 7	Undiagnostic trip.	2-Apr-2026	2-Apr-2026	3.52	Unit restarted.

San Juan CT 5	Fire protection trip.	21-Apr-2026	21-Apr-2026	5.30	Incorrect signal system failure, instrumentation section bypass logic, unit back online.
San Juan CT 5	Blade path temperature trip.	21-Apr-2026	21-Apr-2026	0.85	The automatic regulator failed. The regulator was bypassed and the system operated through the manual valve.
San Juan ST 5	Fire protection trip.	21-Apr-2026	21-Apr-2026	10.97	Incorrect signal system failure, instrumentation section bypass logic, unit back online.
San Juan ST 5	Blade path temperature trip.	21-Apr-2026	21-Apr-2026	3.20	The automatic regulator failed. The regulator was bypassed and the system operated through the manual valve.
Palo Seco 4	Boiler lead leak.	9-Apr-2026	10-Apr-2026	25.02	The leak was corrected in the Boiler lead.
Palo Seco 4	Broken Boiler lines.	16-Apr-2026	20-Apr-2026	104.28	Lines were fixed.
Palo Seco 4	Broken Boiler lines.	27-Apr-2026	30-Apr-2026	76.13	Lines were fixed.
Palo Seco 1-2	High exhaust temperature fuel nozzles need replacement.	9-Apr-2026	10-Apr-2026	20.00	Fuel nozzles replaced.
Palo Seco 1-2	Diesel fuel line leak.	27-Apr-2026	27-Apr-2026	1.37	Fuel line replaced.
Palo Seco 1-2	Diesel fuel line leak.	28-Apr-2026	29-Apr-2026	26.43	Fuel line replaced.
Palo Seco MP 1	Turbine lubrication motor failed.	7-Apr-2026	7-Apr-2026	5.88	Replacement motor installed scavenged from MP 3 unit.
Palo Seco MP 3	Combustor replacement needed.	6-Apr-2026	24-Apr-2026	439.92	Replacement completed.
Palo Seco TM 2	Loss of 480V.	17-Apr-2026	18-Apr-2026	5.65	Repairs completed.
Palo Seco TM 2	VSV Driver failure.	29-Apr-2026	30-Apr-2026	14.20	VSV Pumps replaced.

May 2026					
Unit	Description	Date Out	Date In	Duration (Hrs)	Corrective Action
Aguirre CC 2-2	Unit tripped over temperature exhaust gases, EX 2100 trip, Generator lockout, and external trip. Unit went up to 61 MW when Costa Sur 5 tripped.	25-May-2026	25-May-2026	0.70	The unit was normalized and put into service.
Aguirre CC 2-4	Unit tripped when synchronizing by Inlet Guide Vane Control Trouble trip.	19-May-2026	19-May-2026	0.80	The L4IGVT signal was forced.
Aguirre CC 2-4	Unit tripped over temperature exhaust gases, EX 2100 trip, Generator lockout, and external trip. Unit went up to 61 MW when Costa Sur 5 tripped.	25-May-2026	25-May-2026	0.90	The unit was normalized and ran at 3,600 rpm, LUMA TOC did not want it in service.
Aguirre CC 1-1	Unit trip due to exhaust blower 1-1B output.	30-May-2026	30-May-2026	0.70	The unit was available with the exhaust blower 1-1A. The next day the motor was changed to 1-1B.
Costa Sur 6	Unit 6 on 100% Bunker C. Bunker C control valve water accumulator broke apart causing the valve to shut instantaneously. This also caused a master fuel trip and tripped the Boiler and the unit out of service.	4-May-2026	4-May-2026	1.85	Water accumulator eliminated from the instrumentation line supply and proceeded with the synchronization of the unit.
Costa Sur 5	MKVI activated the prot trip.	25-May-2026	28-May-2026	63.13	Checked the internal and termination wiring, also the circuit for the MKVI cabinet and proceeded with the synchronization of the unit.
Mayaguez 2B	Flame out trip.	2-May-2026	2-May-2026	6.73	A reset was performed.
Mayaguez 2B	Flame out trip.	6-May-2026	6-May-2026	14.95	The igniters were cleaned and swapped out.
Mayaguez 3A	The Hydraulic System started a Permissive trip.	11-May-2026	11-May-2026	1.72	A reset was performed.
Mayaguez 3A	Uni 3B was being aligned, therefore unit 3A was unavailable.	15-May-2026	16-May-2026	32.42	Alignment completed.
Mayaguez 3B	Unit 3B PB DOT trip. A boroscope was performed. Also pressure transmitters were high. Those are related with the scavage.	18-May-2026	29-May-2026	262.13	A boroscope was performed. Pressure Transmitters were calibrated, solenoid valve were replaced.
Mayaguez 3B	Pressure Transmitters remained high.	29-May-2026	30-May-2026	19.57	A loose fitting was found.
Palo Seco 3	Broken Boiler.	21-May-2026	31-May-2026	250.85	Corrected.
Palo Seco 4	Broken Boiler.	10-May-2026	13-May-2026	64.62	Corrected.
San Juan 9	Electrical failure on Boiler Feed Pump 9-2.	23-May-2026	25-May-2026	49.08	Checked connections on Boiler Feed Pump 9-2 and certified a burned motor.
San Juan TM 10	Lost of mega vars controls.	19-May-2026	19-May-2026	2.62	Inspected and reset.
San Juan TM 10	N1n5 node fault.	23-May-2026	23-May-2026	3.48	Cleaned and reset.
San Juan TM 10	Breaker issue.	25-May-2026	26-May-2026	27.98	Breaker repaired.
San Juan TM 2	Node n-1 issues.	1-May-2026	4-May-2026	72.5	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	4-May-2026	6-May-2026	43.83	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	8-May-2026	12-May-2026	86.47	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	12-May-2026	14-May-2026	47.03	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	15-May-2026	21-May-2026	146.55	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	28-May-2026	31-May-2026	79.48	System cleaned and reset.
San Juan TM 2	Node n-1 issues.	28-May-2026	28-May-2026	0.83	System cleaned and reset.
San Juan TM 5	Main breaker failure.	25-May-2026	25-May-2026	2.1	Breaker fixed.
San Juan TM 3	Main breaker failure.	25-May-2026	25-May-2026	2.1	Breaker fixed.
San Juan TM 7	Main breaker failure.	25-May-2026	25-May-2026	2.1	Breaker fixed.

June 2026					
Unit	Description	Date Out	Date In	Duration (Hrs)	Corrective Action
Aguirre CC 1-1	Unit trip over temperature exahust gases (spread trip).	1-Jun-2026	1-Jun-2026	2.10	Themocouples #4 and #12 they crossed the signal with thermocouple #5 and #1, respectively. Another day they were changed.
Aguirre CC 2-1	It was not a unit trip. When taking battery bank 2-1 out of service, breaker 0012 and 0014 opened on the 230kv.	4-Jun-2026	4-Jun-2026	2.70	Battery bank 2-1 was put into service, 2 fuses on the UPS were replaced, and the trip coil on the incomming breaker 2A (4.16kv) was changed.
Aguirre CC 2-1	Unit trip with output bars explore.	13-Jun-2026	18-Jun-2026	131.80	Completed, the output bars were removed, the insulation was changed and bars were cleaned. A test was performed on the transformer.
Aguirre CC 2-1	Unit trip due to generator and exciter fault. Generator and transfoermer lockout activated, relay 87T-2 and 87G-2.	22-Jun-2026	30-Jun-2026	193.20	The unit was disconnected from the transformer to isolate the fault.
Aguirre CC 2-2	It was not a unit trip. When taking battery bank 2-1 out of service, breaker 0012 and 0014 opened on the 230kv.	4-Jun-2026	4-Jun-2026	2.70	Battery bank 2-1 was put into service, 2 fuses on the UPS were replaced, and the trip coil on the incomming breaker 2A (4.16kv) was changed.
Aguirre CC 2-2	Unit trip when U2-1 output bars explode. Lockout generator.	13-Jun-2026	14-Jun-2026	33.90	The U2-1 output bars were diconnected to isolate the fault.
Aguirre CC 2-2	Unit trips when it syncs U2-1 for generator lockout and relay 64G-2. Only one unit can be in service, going out through MPT 2-1/2-2.	18-Jun-2026	24-Jun-2026	139.90	After the U2-1 exciter explosion, it disconnected from the transformer and the relays of the U2-2 generator were calibrated.
Aguirre CC 2-4	It was not a unit trip. When taking battery bank 2-1 out of service, breaker 0012 and 0014 opened on the 230kv.	4-Jun-2026	4-Jun-2026	2.70	Battery bank 2-1 was put into service, 2 fuses on the UPS were replaced, and the trip coil on the incomming breaker 2A (4.16kv) was changed.
Aguirre CC 2-4	It was not a unit trip, it was out of service when the fault occurred in the U2-1 output bars.	13-Jun-2026	13-Jun-2026	2.60	Completed, MOD 0015 was opened to isolate the fault and be able to energize the 230kv.
Aguirre CC 2-4	Unit trips due to the area exciter U2-1 explotion when the 230kv goes out.	22-Jun-2026	23-Jun-2026	10.10	Completed, MOD 0015 was opened to isolate the fault and be able to energize the 230kv.
Cambalache 2	Unit in cooling process prior to inspection. (OMC) - Out of Management Control event. Categorized as a forced outage due to non-approval coordinated maintenance by the electrical system operator (Luma) because of minimum reserve criteria.	11-Jun-2026	12-Jun-2026	15.00	Unit inspection.
Cambalache 2	Unavailability of the turbine's CO2 fire protection system. For safety reasons, the unit cannot operate without a fire protection system.	18-Jun-2026	26-Jun-2026	198.61	Repair on compressor and filling of the CO2 tank of the turbine fire protection system.
Cambalache 3	Unavailability of the turbine's CO2 fire protection system. For safety reasons, the unit cannot operate without a fire protection system.	18-Jun-2026	26-Jun-2026	198.61	Repair on compressor and filling of the CO2 tank of the turbine fire protection system.
Mayaguez 3A	Inspection revealed that the starter of Unit 3B was damaged. Prior to this finding, the operators had shutted down both units 3A & 3B due to abnormal noise originating from within the equipment.	1-Jun-2026	1-Jun-2026	0.52	After confirming that the source of the noise was the starter of Unit 3B, Unit 3A was released for operation and placed back into service.
Mayaguez 3A	One of the PLC cards failed, resulting in erroneus readings from PT501/PT502, which caused the unit to trip, as well as incorrect readings from other pressure transmitters, including PT1011 and PT1012.	9-Jun-2026	9-Jun-2026	4.73	The defective card was identified and replaced, restoring normal operation.

Mayaguez 3A	Switchyard breaker 0010 opened while the unit was in operation, resulting in a unit shutdown/trip.	13-Jun-2026	13-Jun-2026	0.95	LUMA was requested to reclose the breaker, as it falls under their area of responsibility. A subject matter expert later identified that the issue was caused by an Main Power Transformer relay associated with the step-up transformer (13.8 kV/115 kV). The issue was successfully resolved.
Mayaguez 3B	Inspection revealed that the starter of Unit 3B was damaged. Prior to this finding, the operators had shutted down both units 3A & 3B due to abnormal noise originating from within the equipment.	1-Jun-2026	2-Jun-2026	15.12	Starter was replaced.
Mayaguez 3B	One of the PLC cards failed, resulting in erroneous readings from PT501/PT502, which caused the unit to trip, as well as incorrect readings from other pressure transmitters, including PT1011 and PT1012.	9-Jun-2026	9-Jun-2026	5.15	The defective card was identified and replaced, restoring normal operation.
Mayaguez 3B	Switchyard breaker 0010 opened while the unit was in operation, resulting in a unit shutdown/trip.	13-Jun-2026	13-Jun-2026	0.95	LUMA was requested to reclose the breaker, as it falls under their area of responsibility. A subject matter expert later identified that the issue was caused by an MPT relay associated with the step-up transformer (13.8 kV/115 kV). The issue was successfully resolved.
Palo Seco 1-2	Igniter issues.	25-Jun-2026	27-Jun-2026	41.93	Reset igniter.
Palo Seco 1-2	Igniter issues.	28-Jun-2026	29-Jun-2026	25.75	Reset igniter.
Palo Seco 1-2	Fuel leak.	29-Jun-2026	30-Jun-2026	27.12	Corrected.
Palo Seco 1-2	Fuel leak.	30-Jun-2026	30-Jun-2026	0.48	Corrected.
Palo Seco 3	Broken Boiler.	1-Jun-2026	4-Jun-2026	61.58	Leaks corrected.
Palo Seco 3	Real air flow indicator bad signal caused trip.	24-Jun-2026	24-Jun-2026	3.80	Indicator corrected.
San Juan TM 2	Node n-1 issues.	4-Jun-2026	9-Jun-2026	120.55	System inspected and reset.
San Juan TM 6	Synchronizer fail.	2-Jun-2026	2-Jun-2026	0.83	Synchronizer fixed.
San Juan TM 7	High temperature spread.	22-Jun-2026	23-Jun-2026	17.08	Technician replaced bolts.
San Juan TM 10	Instrumentation fail.	23-Jun-2026	23-Jun-2026	0.32	System inspected and reset.
San Juan 9	Fire on burner corner C.	17-Jun-2026	30-Jun-2026	331.33	Repairs in progress.
Jobos 1-2	The turbine does not slow down enough to start.	7-Jun-2026	9-Jun-2026	45.63	Valve replacement 20 TU.
Daguao 1-1	Generator Voltage Control trouble.	3-Jun-2026	3-Jun-2026	0.20	The Unit was repaired and brought back online.
Daguao 1-2	Diesel leak at nozzle number 5.	9-Jun-2026	9-Jun-2026	0.55	The leak was repaired and brought back online.
Daguao 1-2	High exhaust temperature spread.	11-Jun-2026	14-Jun-2026	71.52	The nozzles were replaced with new nozzles.
Daguao 1-2	The water supply line to the speed reducer broke.	14-Jun-2026	14-Jun-2026	3.78	The water line was repaired and returned to service.
Daguao 1-2	Flame detector failure the unit was cycling on and off.	15-Jun-2026	15-Jun-2026	3.25	The flame detector cable was found broke, it was replaced.
Daguao 1-2	Flame detector fault, causing the unit to trip.	18-Jun-2026	18-Jun-2026	6.58	The flame detector were removed, cleaned and the unit was returned to service.
Daguao 1-1	Ignition cable broke, preventing the unit from starting.	19-Jun-2026	19-Jun-2026	3.83	The ignition cables were replaced, and the unit was returned to service.
Daguao 1-1	High exhaust temperature spread.	20-Jun-2026	20-Jun-2026	2.83	Fuel check valves were replaced, and the unit was returned to service.
Daguao 1-2	Cooling system fan drive failure, causing the unit to trip on high temperature.	21-Jun-2026	21-Jun-2026	3.00	The fan system pins were repaired, and the unit was returned to service.

Attachment to #C13(a)

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



UNIT MAINTENANCE PLAN

BOILERS AND TURBO-GENERATORS

Rev.: 8/4/2026 GeneraPR Draft

UNID.	CAP MV	2026												2027											
		JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
SJ CT 5	160																								
SJ STM 5	60																Turbine Inspection (LTSA)								
SJ CT 6	160							Major Overhaul													Turbine Inspection (LTSA)				
SJ STM 6	60											Mayor Outage- install ST Rotor													
SJ 7	100								Major Overhaul																
SJ 9	100													Major Overhaul & Enviromental											
PS 3	216						Enviromental Outage														Enviromental Outage				
PS 4	216															Environmental Outage									
CS 5	410															Env.Maint.									
CS 6	410							Intall AH Baskets & Env. Outage																	
AG 1	450	AG 1 Gen. Rotor failure (Rewinding) / AH Baskets Enviromental Outage																							
AG 2	450																	Install Generator Rotor/AH Baskets & Mayor Outage							
CC Vap I	96	Forced Outage/CCWP Repair																							
CC Vap II	96																								
Cambalache 2	82							Mayor Repair Insp C																	
Cambalache 3	82				Repairs vane carrier after B-type inspect																				
Eco CT 1	176																								
Eco CT 2	176								Annual Maint.												Annual Maint.				
Eco Vap	214																								
AES 1	254																								
AES 2	254					Annual Maint.												Annual Maint.							

Legend

Current Progress

Planned Maintanace

Forced Outage

TOC provides information

PREPARED BY:

William Ríos Mera
Technical Operations Lead

Ferdinand Correa Méndez
Major Projects Planner