NEPR

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

IN RE: 10-YEAR PLAN FEDERALLY FUNDED COMPETITIVE PROCESS	Case No.: NEPR-MI-2022-0005 Motion to Submit Monthly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with *Resolution and Order* of July 30, 2024

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

TO THE ENERGY BUREAU:

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

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

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

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

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

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

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

WHEREFORE, Genera respectfully requests that the PREB **take notice** of the above; **accept** Genera's report on the status of Emergency Generation and Black-Start Generation Procurement for the month of July 2026, included herein as Exhibit A; and **deem** Genera in compliance with the July 30 Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of August, 2026.

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

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Exhibit A – Monthly Report (July 2026)

Emergency Generation and Black-Start Generation Procurement

Docket Number: NEPR-MI-2022-0005
In Re: 10 YEAR PLAN FEDERALLY FUNDED COMPETITIVE PROCESS
Re: Monthly Progress Report – July 2026

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

<u>GPR–PREB–NEPRMI20220005- 20240730#1(a)</u>

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

<u>Response:</u>

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

	Budget	**Costs Incurred**	**Remaining**
Equipment Purchase	$ 513,478,819.97	$ 428,178,364.76	$ 85,300,455.21
Site Development & Construction	$ 452,996,936.67		$ 427,007,766.60
Project Development		$ 25,219,736.70	
Permitting		$ 294,810.68	
Decommissioning & Demolition		$ 474,622.69	
Construction		$ -	
Commissioning		$ -	
Interconnection		$ -	
	$ 966,475,756.64	**$ 454,167,534.83**	**$ 512,308,221.81**

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

Activity	Scope	Costs Incurred
Project Management	Project Development	$ 3,552,474.06
Design	Project Development	$ 20,744,843.98
Site Surveys	Project Development	$ 922,418.66
Permitting	Permitting	$ 294,810.68
Equipment Purchase	Equipment Purchase	$ 428,178,364.76
Demolition	Decommissioning and Demolition	$ 474,622.69
	Total:	**$ 454,167,534.83**

Executive Summary

All sites advanced during this period. At Costa Sur the demolition contractor's demobilization has been completed, and the project has transitioned into the closing documentation phase, with demolition closeout expected in August 2026. Genera also received the final Costa Sur Facility Study from LUMA and is now developing the Scope of Work (SOW) to publish the Point of Interconnection (POI) RFP for Peakers sites.

The critical path remains decommissioning of existing Peaker units at Daguao and Jobos sites. LUMA has conditioned the decommissioning of the existing units to the existence of 810MW of new additional generation and/or interconnection of batteries, while Yabucoa has been the only Peaker site taken out of service so far. The Notice to Proceed is contingent upon approval of the Decommissioning Plan, which is currently under evaluation by the Puerto Rico Public-Private Partnerships Authority (P3A) and the Puerto Rico Energy Bureau (PREB).

The Jobos and Daguao decommissioning remains contingent on completion of the BESS interconnection process at Vega Baja and Cambalache, where construction kick-off meetings with the interconnection contractors began in June 2026. The 800 MW of temporary emergency generation needed to offset LUMA's requirement to authorize the decommissioning of the remaining units is still pending procurement by 3PPO.

For the Engineering, Procurement, and Construction (EPC) RFP #5195 covering Jobos, Yabucoa, and Daguao, proposals have been received and are under Genera's formal evaluation. Proposals for the Yabucoa demolition RFP #5226 were received, and a Letter of Intent to Award was issued to the selected proponent. It is important to note that the Notice to Proceed is contingent upon Decommissioning Plan approval which is under P3Authority and PREB evaluation. Genera still expects to receive proposals for the Costa Sur RFP #5228 in August 2026.

Key open items going forward include the Yabucoa Decommissioning Plan approval, the pending land transfer for the Yabucoa site, and completion of the BESS interconnection process to decommission units at Jobos and Daguao. The land transfer is scheduled for discussion with PREPA on August 12, 2026.

Progress Overview by Site:

Costa Sur

- The demolition contractor's demobilization has been completed. The project has officially transitioned into the closing documentation phase, during which remaining administrative and technical records will be compiled and submitted. Demolition phase closeout is expected to be completed in August 2026.
- For RFP #5228, addressing Civil, Structural and Peakers installation works, proposals are expected to be received in August 2026.
- Genera received the Costa Sur Facility Study final report from LUMA Energy and is currently developing the SOW in preparation for the publication of the POI RFP. The revised timeline for the Costa Sur project reflects the time required to complete FEMA approval and the subsequent procurement process. FEMA approval was requested on September 20, 2024, and granted on October 30, 2025. Immediately following approval, procurement of construction contractors began and is still underway, with proposals expected by August 2026. As construction is contingent upon completion of the procurement process, the project schedule has been directly affected by these sequential requirements.

Yabucoa

- The land transfer for the Yabucoa site will be discussed with PREPA during the August 2026 meeting.
- Genera received the Facility Study final report from LUMA Energy in April 2026. Upon receiving the final Facility Studies, Genera is in the final stages of developing the SOW to publish POI RFP.
- The Yabucoa Decommissioning Plan was submitted by Genera on July 1st, 2026, and is pending P3A and PREB review and approval.
- For the EPC RFP #5195, covering Peakers installation works for Yabucoa, proposals were received and are currently under Genera's formal evaluation process.

- For the Yabucoa demolition RFP #5226, proposals were received, and Genera issued a Letter of Intent to Award to the selected proponent. The Demolition Notice to Proceed is currently planned for October 2026 and is contingent upon the PREB's approval of the Decommissioning Plan.
- The Yabucoa project timeline reflects an extended sequence of regulatory approvals and procurement steps. On January 7, 2025, LUMA required 810 MW of new additional generation and/or Replacement Capacity before decommissioning could proceed, a condition tied to delays in the 800 MW Emergency Generation Project managed by the 3PPO. Formal conditional approval from LUMA received on January 26, 2026, was contingent on BESS installation, to offset Peakers generation. LUMA authorized disconnection and decommissioning on April 10, 2026. The P3Authority issued the Decommissioning Notice on June 2, 2026, and Genera submitted its Decommissioning Plan on July 1st, 2026. Procurement for the demolition and EPC contractors is ongoing; proposals were received and a Letter of Intent to Award was issued to the selected proponent. As construction cannot begin until these steps are completed, the timeline has been directly affected by this sequence of approvals and procurement milestones.

Jobos and Daguao

- For the EPC RFP #5195, covering Peakers installation works for the Jobos and Daguao sites, proposals were received and are currently under Genera's formal evaluation process. Submission to receive contract approval from the P3A and the Financial Oversight and Management Board for Puerto Rico (FOMB) is targeted for September 2026.
- Upon receiving the final Facility Studies, Genera is currently developing the SOW in preparation for the publication of the POI RFP.
- The Jobos and Daguao schedule has been impacted by an extended regulatory approval process and dependency on BESS interconnection at Vega Baja and Cambalache. LUMA concurred with decommissioning of Jobos 1-1 impaired unit in November 2024; however, objected to decommission Jobos 1-2 and Yabucoa 1-2 operating unit. Demolition of Jobos impaired unit cannot be started due to the risk this demolition work

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

Potential Risks

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

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

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

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

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

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

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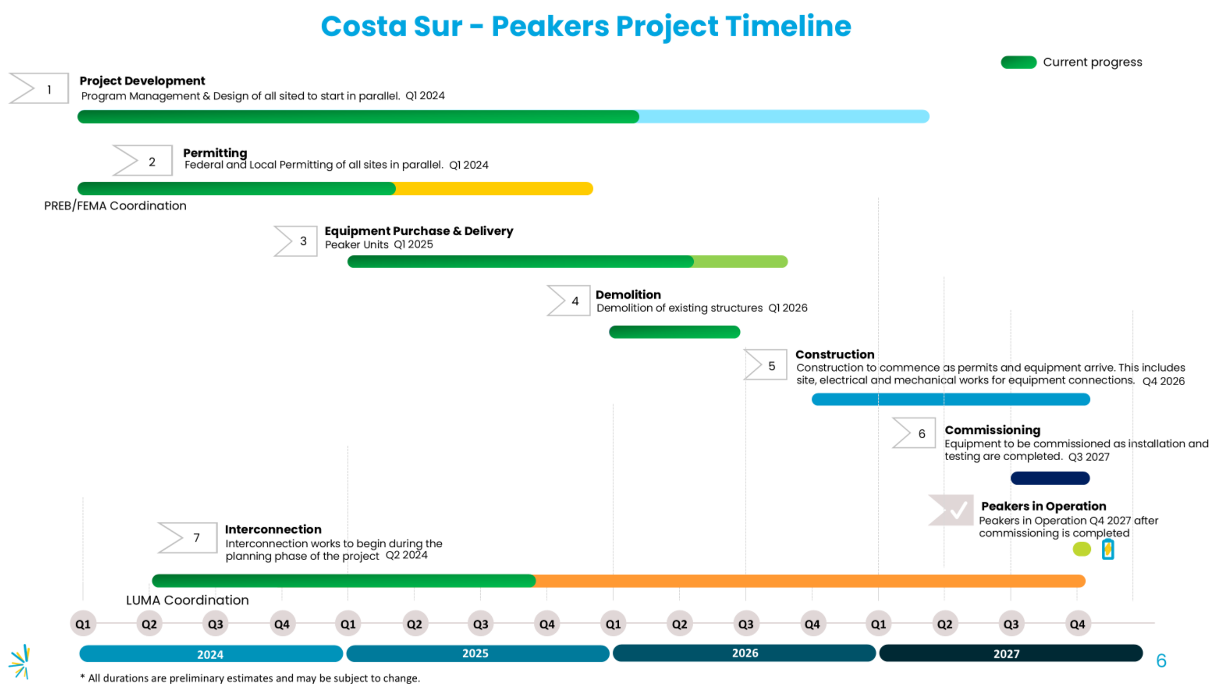
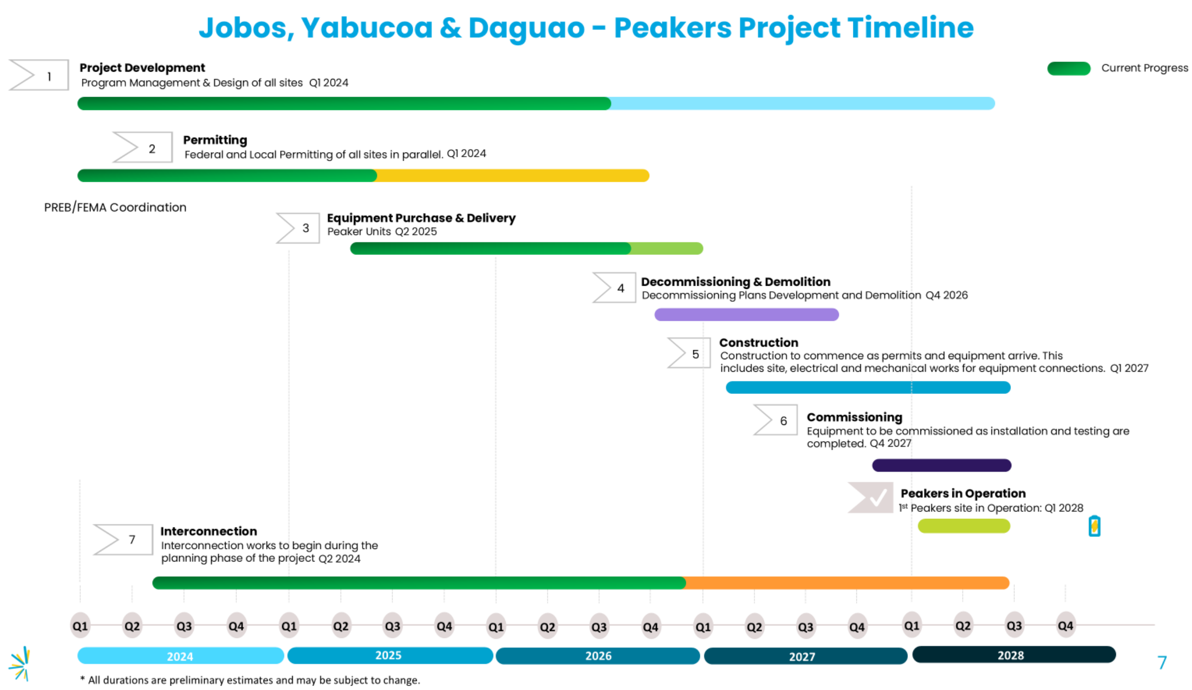
b. The stages of each task, timeline, present status, and estimated time for completion.

Response:



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



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

Key Factors Impacting Schedule:

a. This project was submitted to FEMA on September 20, 2024. After FEMA began evaluating the Project, multiple RFIs were received, especially from environmental teams. Extensive negotiations with FEMA EHP were held to avoid triggering a higher-level NEPA review, which would have potentially delayed the project for over a year. After 13 months, the project received approval from FEMA on October 30, 2025.
b. LUMA has not authorized the decommissioning of all existing peaker units (except Yabucoa). LUMA opposed Genera's decommissioning plan and requested all MW capacity substitutions along with a Replacement Capacity of 810MW of new additional generation capacity in order to concur with the decommissioning request. Genera had anticipated that the 800MW emergency generation project would be implemented but is still pending procurement by 3PPO. The new peaking units cannot be installed without first removing the existing units in Yabucoa, Daguao and Jobos, since they will be installed in the same footprint. Genera received formal conditioned concurrence letter from LUMA on January 26, 2026. However, as part of the conditions, Genera must place at least 76MW of BESS into service before beginning decommissioning of the existing peaker units. Only Yabucoa units were authorized to be decommissioned. The Decommissioning Notice was received from P3A in June 2026. Genera submitted the Decommissioning Plan on July 1st, 2026.
c. The Impact Study and Facility Studies for Costa Sur and Yabucoa were completed by LUMA in April 2026. LUMA completed the Facility Studies for Daguao and Jobos in June 2026. These were needed before agreeing to the use of the existing interconnection points. These delays in completing the Facility Studies affected the project execution by 9–18 months from the proposed timeline presented by Genera.
d. Costa Sur project Federal Funds Approval and Procurement Timeline:

i. The project was submitted to FEMA for approval on September 20, 2024.
ii. FEMA funds approval was granted on October 30, 2025. FEMA approval was required in order to be able to make the mandatory funding certifications for procurement processes.
iii. Procurement for construction contractors initiated immediately upon funding approval on October 30, 2025; procurement process remains ongoing, with proposals expected by August 2026.
iv. Following the completion of procurement, the construction start date will be affected by the duration of the P3A and FOMB approval process.

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

vii. LUMA authorized disconnection and decommissioning of Yabucoa Units on April 10, 2026.
viii. P3A issued the Decommissioning Notice for Yabucoa Units on June 2, 2026; Genera submitted the Decommissioning Plan in July 2026.
ix. Procurement for both the Demolition and EPC contractors is ongoing, proposals were received and a Letter of Intent to Award was issued to the selected proponent in July 2026.

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

b. The Final Scope of Work for both sites was approved and shared with LUMA on April 22, 2026.
c. The First Schedule Workshop with LUMA was held on May 20, 2026, to define the POI schedule and process.
d. The construction contractor kick-off meeting was held for Cambalache on June 23, 2026 and the kick-off meeting for Vega Baja is scheduled for August 2026.
e. The construction contractor for Cambalache Interconnection works is currently working on the development of the 60% design package while the construction contractor for Vega Baja Interconnection works is currently working on the development of the 30% design package.

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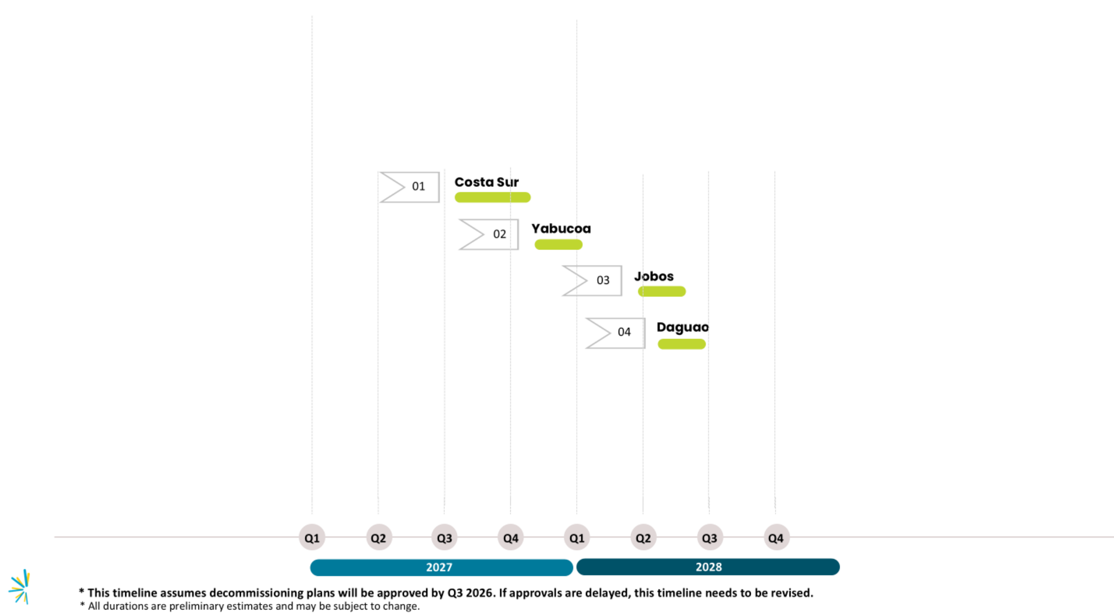
c. Project timeline chart (*e.g.* Gantt Chart) with critical path for the Commercial Operation Date ("COD") of the project.

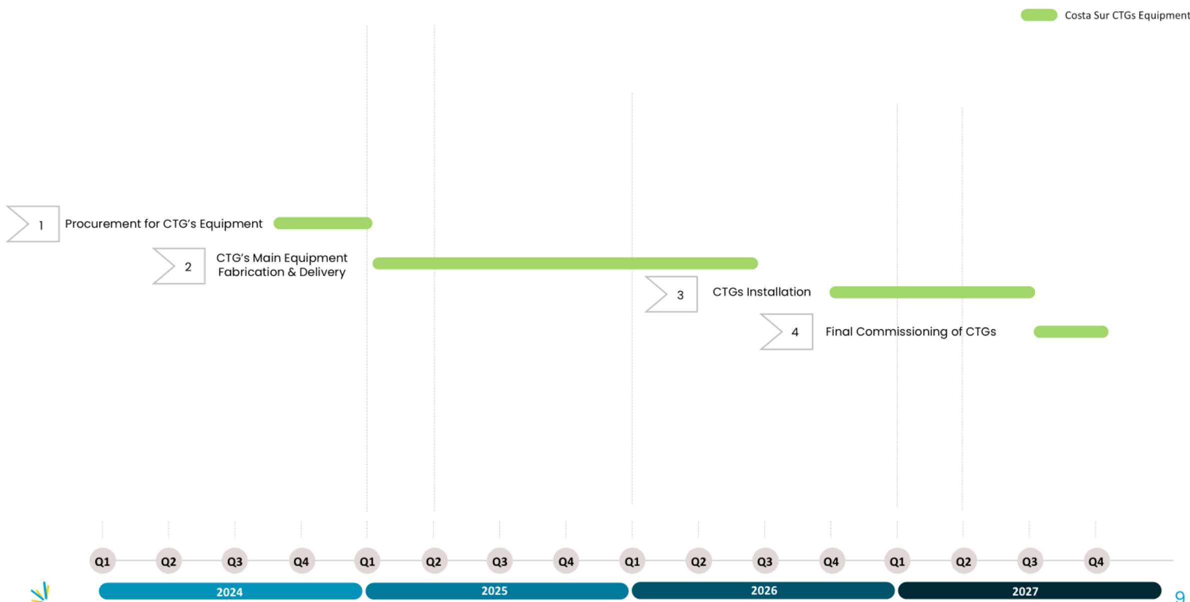
Response:

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

Peakers: Commissioning Timeline

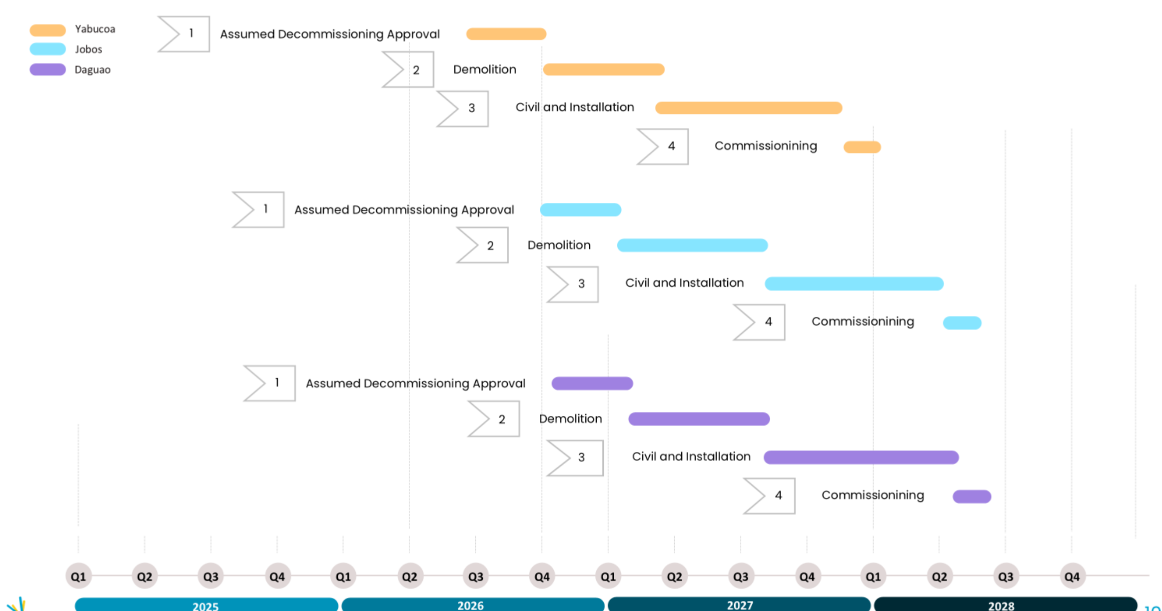


Peakers – Critical Path Timeline: Costa Sur



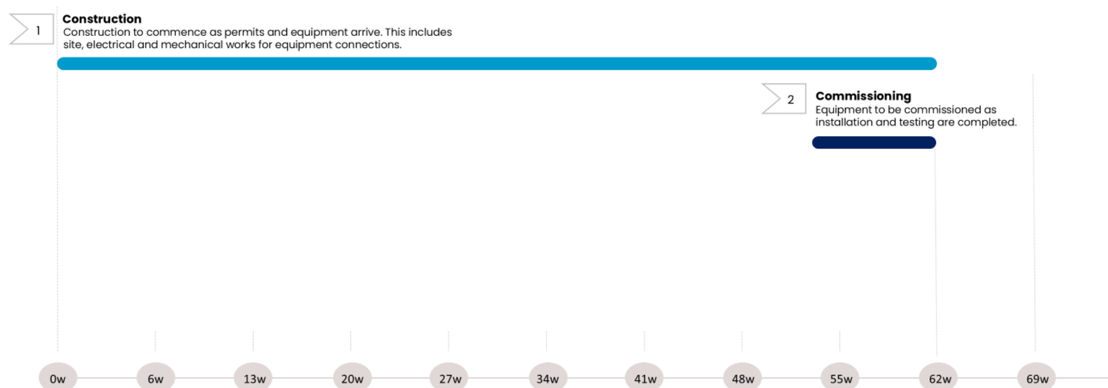
* All durations are preliminary estimates and may be subject to change.

Peakers – Critical Path Timeline: Jobos, Yabucoa & Daguao



*** This timeline assumes decommissioning plans will be approved by Q3 2026. If approvals are delayed, this timeline needs to be revised.**
* All durations are preliminary estimates and may be subject to change.

Costa Sur - Peakers Project Duration*
(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



* All durations are preliminary estimates and may be subject to change.

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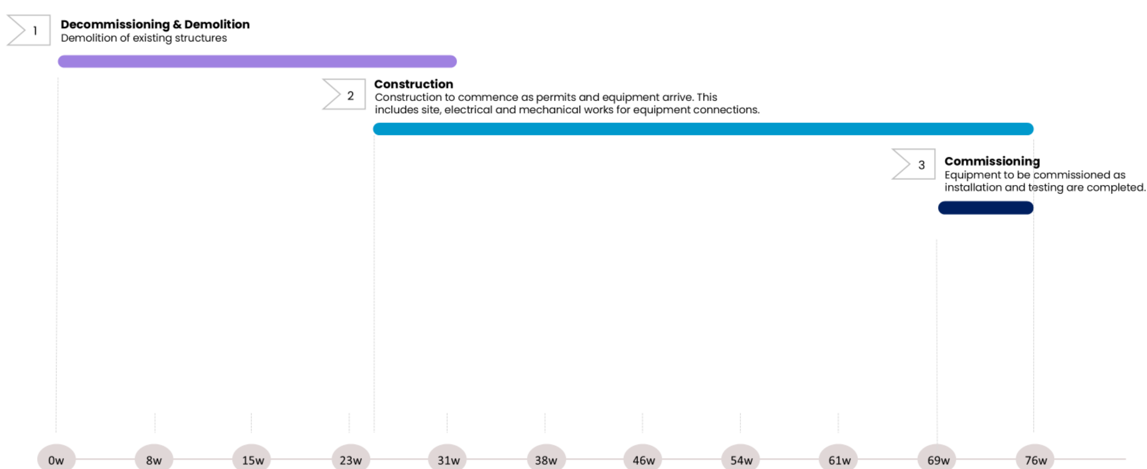
Jobos, Yabucoa & Daguao - Peakers Project Duration*
(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



* All durations are preliminary estimates and may be subject to change.

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

Response:

NEPA Permit Status[2]

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

Federal Permits Status – Yabucoa, Daguao and Jobos[3]

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

[2] All dates are preliminary estimates and are subject to change.
[3] All dates are preliminary estimates and are subject to change.

Federal Permits Status – Costa Sur[4]

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

Local Permits Status – Yabucoa, Daguao and Jobos[5]

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

[4] All dates are preliminary estimates and are subject to change.
[5] All dates are preliminary estimates and are subject to change.

Local Permits Status – Costa Sur [6]

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

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

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

Response:

See responses to questions a through d.

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

Response:

NEPA Permit Costs[7]

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

Federal Permit Costs[8]

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

Local Permit Costs[9]

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

[7] All costs are preliminary estimates and are subject to change.
[8] All costs are preliminary estimates and are subject to change.
[9] All costs are preliminary estimates and are subject to change.