

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

IN RE: PRIORITY PLAN FOR ELECTRIC GRID
STABILIZATION

CASE NO.: NEPR-MI-2024-0005

SUBJECT: Probe of the Status, Availability, Operation, and Maintenance of the Temporary Generation Fleet Sited Between the San Juan and Palo Seco Power Plants — Priority Stabilization Plan Activity No. 1; Requirement of Information; Technical Conference

RESOLUTION AND ORDER

I. Background

On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order in this docket ("PSP Order"), through which it adopted the Electric System Priority Stabilization Plan ("PSP"). Priority Stabilization Activity No. 1 of the PSP directs the extension of the operation of the seventeen (17) TM2500 temporary generation units sited between the San Juan and Palo Seco power plants through December 31, 2027.¹ The PSP Order explains that retaining these TM2500 units "provides a near-instant cushion against forced outages, preventing frequent load shedding," that "[t]heir existing location near major load centers helps stabilize voltage and ensures adequate spinning reserve," and that "extending these mobile units offsets potential capacity deficits."² The resource-adequacy analysis underlying the PSP attributes to the addition of approximately 350 MW associated with this temporary generation a material reduction in expected loss-of-load events during the stabilization period.³

The TM2500 units were originally deployed as part of the federal emergency generation mission following Hurricane Fiona, funded by the Federal Emergency Management Agency ("FEMA") and executed through the United States Army Corps of Engineers ("USACE") and Weston Solutions, Inc., with NFE Power PR LLC ("NFE" or "Seller") serving as energy service provider at the Palo Seco and San Juan power plants under Energy Services Agreements dated March 3, 2023, and April 19, 2023, respectively.⁴

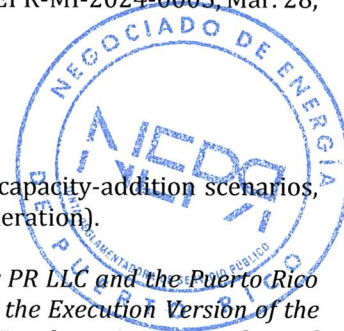
On March 15, 2024, the Puerto Rico Electric Power Authority ("PREPA"), as Buyer, and NFE, as Seller, with New Fortress Energy Inc. ("New Fortress") joining solely for purposes of Section 9.5 (parent guaranty), executed an Asset Purchase Agreement (the "APA") through which PREPA acquired fourteen (14) of the TM2500 turbine-generator units — ten (10) sited at the San Juan power plant and four (4) sited at the Palo Seco power plant, each rated at approximately 25 MW — for an aggregate purchase price of \$306,598,756.47, with FEMA

¹ Resolution and Order, *In re: Electric System Priority Stabilization Plan*, Case No. NEPR-MI-2024-0005, Mar. 28, 2025 ("PSP Order"), Attachment, Priority Stabilization Activity No. 1

² PSP Order, Attachment (Urgency/Impact and Rationale for Activity No. 1).

³ PSP Order (resource-adequacy analysis of expected loss-of-load events under capacity-addition scenarios, including the approximately 350 MW scenario associated with this temporary generation).

⁴ *In re: Request for Approval of the Asset Purchase Agreement between NFE Power PR LLC and the Puerto Rico Electric Power Authority*, Case No. NEPR-AP-2024-0001, *Urgent Motion to Submit the Execution Version of the Asset Purchase Agreement*, filed by PREPA on March 15, 2024, Exhibit C *Asset Purchase Agreement by and between NFE Power PR LLC, as Seller, the Puerto Rico Electric Power Authority, as Buyer, and New Fortress Energy Inc. (solely for purposes of Section 9.5), dated March 15, 2024.*



funding contemplated for up to ninety percent (90%) of the purchase price.⁵ Section 7.11 of the APA granted PREPA a Purchase Option for the acquisition of the additional units remaining on site, exercisable no later than ninety (90) days following the closing date, with the purchase-option price inclusive of demobilization of non-acquired units and the installation and commissioning of the acquired additional units at the Seller's sole cost.⁶

As part of the APA, and in consideration of maintenance findings disclosed in borescope reports referenced in the disclosure schedules, the Seller further agreed, by side letter, that upon written request of the Buyer no later than twelve (12) months following closing, the Seller would provide major maintenance for up to seven (7) units of the Power Generation Equipment — expressly including any repair and/or replacement of any and all parts identified as damaged or not serviceable while Hot Section major maintenance is being performed — at the Seller's sole cost and expense, including disassembly, reassembly, and shipping to and from an authorized General Electric repair service center, with completion certified by General Electric or a GE-qualified third party. These obligations constitute "Guaranteed Obligations" of New Fortress Energy Inc. under Section 9.5 of the APA.⁷

Following the acquisition, PREPA entrusted the operation and maintenance of the units to Genera PR LLC ("Genera"), as operator of the Legacy Generation Assets. Genera, in turn, obtains TM2500-related labor and services through an Intercompany Services Agreement with Genera Services LLC, an affiliate, dated as of July 22, 2024, and effective as of July 1, 2023, under which costs are reimbursed without mark-up for profit and Genera holds audit rights over the service provider's books and records.⁸

The Energy Bureau has consistently provided funding for the operation and maintenance of this temporary generation fleet. The approved FY2025 necessary maintenance expense portfolio included a dedicated allocation of \$17.0 million for temporary power operation and maintenance, and the Final Resolution and Order on Electricity Rates issued on April 15, 2026, in Case No. NEPR-AP-2023-0003 (the "Final Rate Order") approved \$17,000,000 annually for TM2500 operation and maintenance for fiscal years 2026, 2027 and 2028 — \$51.0 million over the rate period. The rate case record reflects Genera's own accreditation that \$17,063,597.08 corresponds to the operation and routine maintenance of the fourteen (14) units in service, with recurring service intervals performed under the equipment manufacturer's protocols.⁹

On June 25, 2026, in Case No. NEPR-MI-2021-0004, Genera submitted additional information reporting that the two Palo Seco TM2500 units operationally designated Units 3 and 4 sustained damage and were removed from service, withdrawing approximately 40 MW of capacity from the system; that a competitive request for proposals (RFP No. 5175, issued February 25, 2026) returned no bids; that Genera obtained a budgetary proposal from Siemens Energy (Proposal SF262532095, Rev. 00, dated March 31, 2026) for an LM2500/LM2500+ SAC hot-section exchange with an all-in restoration estimate of

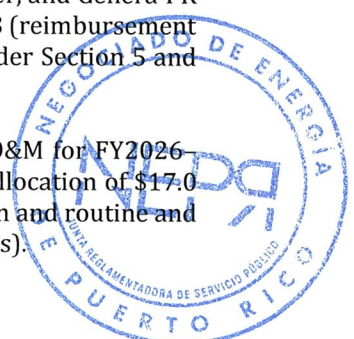
⁵ APA § 3.1(a) (Purchase Price of \$306,598,756.47); APA § 7.9 and the definition of "FEMA Funding" (funding of up to 90% of the Purchase Price); APA Recital 4 and Schedule 2.1(a) (four gas turbines at Palo Seco and ten gas turbines at San Juan).

⁶ APA § 7.11 (Purchase Option); definitions of "Purchase Option Expiration Date" (ninety (90) days following the Closing Date) and "Purchase Option Purchase Price."

⁷ APA side letter regarding major maintenance accommodation (up to seven (7) major maintenance completions in the aggregate; obligations constitute "Guaranteed Obligations" subject to New Fortress Energy Inc.'s obligations under APA § 9.5).

⁸ Intercompany Services Agreement by and between Genera Services LLC, as Service Provider, and Genera PR LLC, as Company, dated as of July 22, 2024 (effective as of July 1, 2023), §§ 3.2 (Audit), 5.1–5.3 (reimbursement without mark-up for profit; invoicing; payment terms), and Exhibit A (Scope of Services under Section 5 and Annex IX of the LGA OMA).

⁹ Final Rate Order, Chapter Four, Part XIV (approving \$17,000,000 annually for TM2500 O&M for FY2026–FY2028); see also the FY2025 necessary maintenance expense portfolio (Temp Pwr O&M allocation of \$17.0 million) and Genera Ex. 901, Case No. NEPR-AP-2023-0003 (\$17,063,597.08 for the operation and routine and minor maintenance of the fourteen (14) units in service under manufacturer (OEM) protocols).



approximately \$6,050,000; and that the contracting process was suspended following the Final Rate Order.¹⁰ Although Genera reports that only 2 units have been removed from service, LUMA's Daily Generation Availability Report, as of August 28, 2026, shows that only 4 out of 14 units are in operation. This report also shows 2 units as "out of service" and 8 units as "forced outage".

The June 25, 2026, filing was the first notice to the Energy Bureau that any of the TM2500 units were not operational. Genera came before the Energy Bureau four months after it had issued RFP No. 5175 — after the units sustained damage and were removed from service — meaning that Genera knew of the failures, and was already procuring their repair, well before it disclosed the need for such repairs. Notably, although the rate review proceeding in Case No. NEPR-AP-2023-0003 was pending throughout this period and did not conclude until the Final Rate Order of April 15, 2026, at no point during that proceeding did Genera articulate this purported funding need. The Energy Bureau is concerned that failures of this consequence were not timely advised, when PSP Activity No. 1 is clear about the system's need for this capacity through December 31, 2027. The Energy Bureau is equally concerned that these failures may be related to adherence to an adequate maintenance schedule — maintenance for which the Energy Bureau, through the annual \$17 million operation and maintenance allocation, ensured that Genera had the funds.

II. Discussion

The availability of this temporary generation fleet is prescribed by the PSP. Activity No. 1 directs that the seventeen (17) TM2500 units sited between the San Juan and Palo Seco power plants remain in operation through December 31, 2027, precisely because they provide a near-instant cushion against forced outages at the system's major load centers. Because these units were deployed on an emergency basis, the Energy Bureau also requires assurance that the systems that support them — electrical switchgear, protections and interconnection, fuel supply and storage, and related common infrastructure — are adequate for the extended operation the PSP prescribes, and that repairs, once identified as necessary, are procured and executed with the urgency the condition of the system demands.

Three considerations frame this probe. First, these units are of recent acquisition. PREPA purchased them in March 2024, following a period of operation under the federal emergency mission. Units of this vintage, dedicated funding, and manufacturer support should not, in the ordinary course, exhibit widespread unavailability. It is difficult to understand how a good portion of this fleet is reported out of service barely two (2) years after acquisition.

Second, the Energy Bureau has consistently approved approximately \$17 million every year for the operation and maintenance of this fleet. The Energy Bureau's expectation in granting these funds, year after year, is that the units receive the maintenance prescribed by the manufacturer upon reaching the operating-hour intervals the manufacturer specifies, as any responsible operator should do, to prevent forced outages. If a substantial portion of the fleet is nonetheless unavailable, the Energy Bureau must understand how these funds have been used, whether the allocation exceeds the needs of the fleet in place, and whether the maintenance regime funded by these dollars has in fact been executed. The intercompany structure through which these services are procured — cost reimbursement to an affiliate without mark-up, subject to audit rights that exist to be exercised — requires equivalent transparency.

Third, the acquisition documents themselves provide for repairs. The APA side letter obligates the Seller, upon timely written request of the Buyer, to provide major maintenance — including hot-section work and the repair or replacement of all parts found damaged or not serviceable in its course — for up to seven (7) units, at the Seller's sole cost, with parent-guaranteed performance. Yet the relief Genera has described for the two damaged Palo Seco units contemplates funding hot-section restoration from ratepayer-sourced mechanisms. Before any ratepayer-sourced dollar is directed to repairs of this kind, the Energy Bureau

¹⁰ In re: LUMA's Initial Budget and Related Terms of Service, Case No.: NEPR-MI-2021-0004, Genera PR LLC's Submission of Additional Information and Supporting Documentation in Compliance with the June 15, 2026, Resolution and Order, and Request for Guidance and Authorization Regarding FY2026 Reliability-Critical Expenditures, filed by Genera on June 25, 2026, pp 6-7 and Exhibit 6.



must understand whether the contractual remedies available under the acquisition documents were timely invoked and exhausted.

The Energy Bureau also requires clarity from PREPA. The federal grant provided for the acquisition of seventeen (17) units; approximately 70 MW of that capacity remains unacquired notwithstanding a Purchase Option whose exercise window closed ninety (90) days after the APA closing. That capacity is very much needed by the system, and the Energy Bureau requires a full accounting of the status of the acquisition.

Accordingly, in the exercise of its continuing oversight of the Priority Stabilization Plan (PSP) in this docket, the Energy Bureau undertakes a status probe of the temporary generation associated with PSP Activity No. 1. The purpose of this Resolution and Order is to obtain comprehensive information regarding the operation, maintenance, reliability, condition, failures, fuel capability, the adequacy of supporting electrical and fuel infrastructure, spare parts inventory, contractual arrangements, and warranty status of the fourteen (14) TM2500 turbine-generator units, each rated at approximately 25 MW and distributed between two sites — ten (10) units at San Juan and four (4) units at Palo Seco — as well as the three (3) Pratt & Whitney Power Systems FT8 MOBILEPAC gas turbine units at Palo Seco. Several units are currently out of service. The requested information is intended to provide a complete understanding of the historical and current condition of the units and to identify the causes of outages, recurring problems, maintenance requirements, and any outstanding warranty or contractual issues.

III. Requirement of Information

The Energy Bureau **DETERMINES** that additional information is required for its continuing oversight of PSP Activity No. 1.

The Energy Bureau **ORDERS** Genera and PREPA to respond, on or before September 9, 2026, to the Requirements of Information ("ROIs") set forth in Attachment A to this Resolution and Order. Responses shall be complete, organized by question number, supported by the underlying documents requested, and accompanied by any spreadsheets in native format with all formulas and links intact.

IV. Technical Conference

The Energy Bureau will hold a Technical Conference on Tuesday, September 15, 2026, at 9:30 a.m. at the Energy Bureau's Hearing Room, located at the World Plaza Building, 268 Muñoz Rivera Ave., 8th Floor, San Juan, PR. Furthermore, Genera and PREPA shall be prepared to answer questions from the Energy Bureau, its staff, and consultants regarding the matters discussed in this Resolution and Order.

V. Conclusion

The Energy Bureau stresses that the availability of the temporary generation fleet associated with Priority Stabilization Plan (PSP) Activity No. 1 is prescribed by the PSP Order and is critical to the stability of the electric system through December 31, 2027.

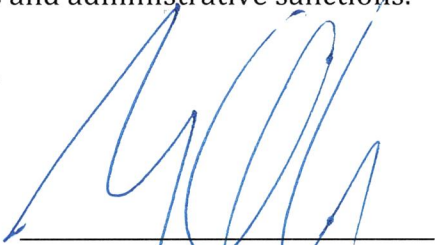
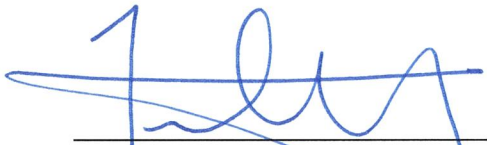
The Energy Bureau **ORDERS** Genera and PREPA to file their complete responses to the Requirements of Information set forth in Attachment A on or before September 9, 2026.

The Energy Bureau **ORDERS** Genera and PREPA to appear at the Technical Conference on Tuesday, September 15, 2026, at 9:30 a.m., at the Energy Bureau's Hearing Room, World Plaza Building, 268 Muñoz Rivera Ave., 8th Floor, San Juan, PR, prepared to answer questions from the Energy Bureau, its staff, and consultants regarding the matters discussed in this Resolution and Order.



The Energy Bureau **WARNS** that, in accordance with Article 6.36 of Act 57-2014,¹¹ noncompliance with this Resolution and Order, regulations, and/or applicable laws may carry the imposition of fines and administrative sanctions.¹²

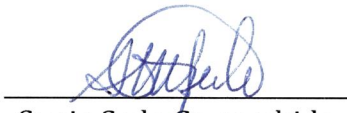
Be it notified and published.


Edison Avilés Deliz
Chairman
Ferdinand A. Ramos Soegaard
Associate Commissioner
Sylvia B. Ugarte Araujo
Associate Commissioner
Antonio Torres Miranda
Associate Commissioner
Omar M. Rodríguez González
Associate Commissioner

CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau agreed on August 31, 2026. I also certify that on August 31, 2026, I have proceeded with the filing of this Resolution and Order and was notified by email to alexis.rivera@prepa.pr.gov; nzayas@gmlex.net; mvalle@gmlex.net; rcruzfranqui@gmlex.net; lrn@roman-negron.com; legal@genera-pr.com; regulatory@genera-pr.com; RegulatoryPREBorders@lumapr.com; Emmanuel.porrogonzalez@us.dlapiper.com; laura.rozas@us.dlapiper.com; margarita.mercado@us.dlapiper.com.

I sign this in San Juan, Puerto Rico, today August 31, 2026.


Sonia Seda Gaztambide
Clerk

¹¹ Known as the *Puerto Rico Energy Transformation and RELIEF Act*, as amended (“Act 57-2014”).

¹² Act 57-2014, Art. 6.36.

ATTACHMENT A

Requirement of Information
Temporary Generation Associated with Priority Stabilization Plan Activity No. 1

General instructions. Respond to each question separately, identifying the question number. Where a document is requested, provide a complete copy; where data is requested, provide it in native electronic format (Excel with formulas and links intact). If any requested information is not available, state why, identify the custodian of such information, and state the date by which it will be provided. Any claim of confidentiality shall follow the procedure established by the Energy Bureau and shall be accompanied by a public, redacted version.

PART I — QUESTIONS TO GENERA PR LLC

A. Current Fleet Status and PSP Compliance

1. Provide a current fleet status table for each of the fourteen (14) TM2500 turbine-generator units, identifying for each unit: unit designation; specific model designation and nameplate rating, noting any variation in model or rating among the fourteen (14) units; gas generator and package serial numbers; site (San Juan or Palo Seco); current status (in service; available but not operating; out of service; under repair; permanently unavailable); the date the unit was last removed from service, if applicable; the cause of removal; and the expected return-to-service date. In addition, provide a month-by-month summary, from March 2024 through the present, of the number of units in service and out of service and the aggregate capacity (MW) available to the system operator from this fleet.
2. Describe the measures Genera is taking, with dates, to restore the full availability of this fleet through December 31, 2027, as directed by PSP Activity No. 1. For each unit currently out of service, identify: the required scope of repair; each vendor quotation or budgetary proposal obtained, with vendor, date, amount, and validity period; the estimated repair cost and lead time; each internal or corporate approval required to proceed, the date such approval was requested, and its current status; and the source of funding identified for the work. Where commencement of any repair has awaited internal or corporate approval, or the identification of a funding source, for more than thirty (30) days, explain the reason for the delay.
3. Provide copies of all reports, presentations, status tables, condition assessments, correspondence, and any other information — formal or informal — that Genera has provided since PREPA’s acquisition of the units to the Puerto Rico Public-Private Partnerships Authority, to PREPA, or to any other governmental entity or third party regarding the status, condition, availability, maintenance, repair, or funding needs of the TM2500 temporary generation units, identifying the recipient and date of each item. If any information provided is inconsistent with, or more current than, the information provided to the Energy Bureau in response to this Resolution and Order, identify and explain the inconsistency.
4. The fourteen (14) TM2500 units are dual-fuel capable. For each of the two sites, San Juan and Palo Seco: confirm that the fuel infrastructure required to support the operation of the units on both natural gas and diesel — including gas supply and interconnection, diesel storage tanks, pipelines and transfer systems, pumps, unloading and metering facilities, and fuel-quality testing and certification arrangements — is in place and fully operational; identify any component that is not in place or not operational, its effect on the ability of the units to operate on each fuel, and the corrective action, cost, schedule, and funding source required to restore or complete it; and describe the periodic testing performed to verify the ability of the units to start and operate on each fuel, providing the date and result of the most recent such test for each site.



B. Palo Seco TM2500 Units 3 and 4

With reference to Case No. NEPR-MI-2021-0004, *Genera PR LLC's Submission of Additional Information and Supporting Documentation in Compliance with the June 15, 2026, Resolution and Order, and Request for Guidance and Authorization Regarding FY2026 Reliability-Critical Expenditures* (June 25, 2026), Genera stated on page 7 that the Palo Seco TM-2500 units have failed, keeping both units down.

5. Regarding the failures of Palo Seco TM-2500 Units 3 and 4:
 - a) What kind of damage did both TM-2500 Palo Seco units 3 and 4 suffer?
 - b) What was the reason for the failures?
 - c) Did Genera conduct a root-cause analysis to determine the failures? If so, provide it.
 - d) Were the failures related to noncompliance with the maintenance schedules or the operational hours regime?
 - e) What is the estimated downtime for both units?
 - f) What measures does Genera consider preventing this type of failure in the future?
 - g) Do the four Palo Seco TM-2500 units have sufficient natural gas and diesel, consistent with their dual-fuel capability, to ensure continued operation in accordance with the energy dispatch requirement?
 - h) Is the current fuel infrastructure capable of supporting the necessary operation of these units in accordance with the energy dispatch requirements?
 - i) In the last sentence of the first paragraph of page 7 of the June 25, 2026, submission, Genera stated that it "obtained a budgetary proposal from Siemens Energy (Proposal SF262532095, Rev. 00, dated March 31, 2026) for the LM2500/LM2500+ SAC hot-section exchange (Exhibit 6 to this Submission), and was in the administrative process of issuing a Notice to Proceed when the work was suspended for lack of executable budget authority following the April 15, 2026, Final Order." Why, if the Energy Bureau approved a \$17 million O&M budget sized for seventeen (17) units as part of the last Rate Case, while only fourteen (14) units are in place, did Genera state that it suspended repairs to the units due to a lack of an executable budget?
 - j) For each Palo Seco unit that has required the replacement or refurbishment of fuel nozzles or other fuel-system components at any time since January 1, 2024: state the date the need was identified, the date the parts or services were ordered, the vendor, the quoted cost and delivery time, and the date the work was or is expected to be completed; state the effect of any pending work on the unit's ability to operate on each fuel; and explain any interval greater than ninety (90) days between identification of the need and completion of the work.
 - k) State the volume of diesel fuel currently stored on site at Palo Seco, the storage capacity, and the number of days of continuous operation of the four (4) units that the current inventory supports under best-case and worst-case dispatch assumptions; and describe the arrangements, and the time required, for replenishment.
6. GE Vernova performed a hot-section and combustor exchange on TM2500 Unit 557-238 at Palo Seco, at a cost of \$3,752,573.24. Siemens Energy, in turn, submitted a proposal for a similar hot-section repair of Palo Seco TM2500 Units 3 and 4, at a cost of \$4.5 million, which includes credits of \$600,000 for the Units 3 and 4 hot-section modules. The GE Vernova price for Unit 557-238 and the Siemens Energy proposal prices for Units 3 and 4 are summarized in the following tables:



Item	Description*	Qty	Price (USD)
1	Hot Section Exchange Module: • Hight pressure turbine rotor. • S1 Nozzle • S2 Nozzle	1	\$3,131,987.72
2	Combustor G4-SAC Wet	1	\$500,906.70
3	Estimated Delivery: DDP Palo Seco Site, Puerto Rico (Incoterms 2020). Delivery charges shall be invoiced at actual cost, plus the applicable administrative fee set forth in Annex 1.	1	\$ 119,678.83
Total Price (USD)			\$3,752,573.25

Asset #1 LM2500 SAC Hot Section Module

Item	Description	Qty	Total Customer Price (USD)
1	Exchange of One (1) LM2500 SAC Hot Section Module with OEM hardware as per section 2 Asset (481-758).	1	\$ 2,299,000.00
2	Exchange credit from customer LM2500 SAC Hot Section Module (TBC)	1	-\$299,000.00
NET HOT SECTION EXCHANGE			\$ 2,000,000.00

Asset #2 LM2500+ SAC Hot Section Module

Item	Description	Qty	Total Customer Price (USD)
1	Exchange of One (1) LM2500+ SAC Hot Section Module with OEM hardware as per section 2 Asset 557-230 (Subject to Prior Sale).	1	\$ 2,799,000.00
2	Exchange credit from customer LM2500+ SAC Hot Section Module (TBC)	1	-\$299,000.00
NET HOT SECTION EXCHANGE			\$ 2,500,000.00

Based on the information summarized in the tables above, answer the following:

- a) Were these prices obtained through a competitive procurement process in which both vendors participated under the same terms, conditions, and scope of work? If so, identify the solicitation and provide the record of the process; if not, explain why not.
- b) Given that the repair of Unit 557-238 was performed on an emergency basis, explain why the GE Vernova price does not reflect a credit for the hot-section module, comparable to the \$600,000 credit included in the Siemens Energy proposal for Units 3 and 4. State whether such a credit was requested or negotiated with GE Vernova and, if not, why not.
- c) State whether each of these hot-section exchanges corresponds to scheduled maintenance required by the manufacturer upon reaching its prescribed operating thresholds, or to an unforeseen or catastrophic failure. Provide the supporting documentation, including accumulated operating hours, inspection findings, and any failure reports.
- d) If the condition of the three (3) TM2500 units resulted from their sustained high utilization during the declared electrical generation emergency following the recent hurricanes in Puerto Rico — such that the units exceeded the manufacturer's maintenance thresholds without the opportunity to perform the required preventive maintenance, and that circumstance is duly documented — state whether the cost of these repairs would qualify for federal funding. Identify the applicable federal program and its eligibility criteria, and state whether this alternative has been evaluated or pursued.

C. San Juan TM-2500 Units

7. Regarding the ten (10) units located at the San Juan Power Plant:

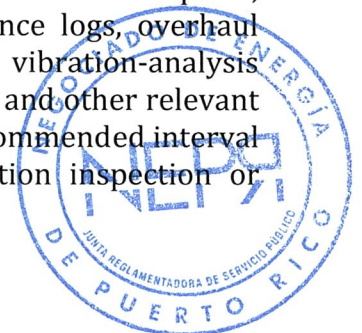
- a) Are the ten (10) units located near the San Juan Power Plant available for operation in accordance with the energy dispatch?
- b) What limitations, if any, do these units have?
- c) Did any of these units experience an unexpected failure? If so, which unit? Explain in detail what happened.



- d) Is the fuel infrastructure for both natural gas and diesel fuel sufficient to ensure the full operation of all the units? If not, what is the limitation? Explain in detail.
- e) Identify every failure or event since January 1, 2025, involving a shared or common system — including auxiliary switchgear, electrical interconnection or protection equipment, fuel supply, or water-treatment supply — that affected more than one unit simultaneously or removed more than one unit from service. For each such event, provide: the date and time; the units affected and the duration of each unit's outage; the root-cause analysis; the corrective and preventive actions taken and their completion status; and any repair that remains pending, with its estimated completion date.
- f) State whether the electrical installation supporting these units — including switchgear, breakers, relays and protection schemes, cable terminations, grounding, and environmental enclosures — is adequate for extended operation through December 31, 2027, as the PSP prescribes. Identify any component installed on a temporary or emergency basis that has not been brought to a standard suitable for extended operation, and describe the scope, cost, schedule, and funding source of any program to weatherize, enclose, or otherwise harden that installation.
- g) For each repair or refurbishment of these units or of their supporting electrical systems performed by a third-party contractor since January 1, 2025: identify the contractor and the scope of work; describe the acceptance testing and quality-assurance oversight applied to the work; state whether the equipment involved failed after the work was performed; and identify any claim, back-charge, withheld payment, or other remedy that has been asserted or is under evaluation for deficient work.
- h) State the volume of diesel fuel currently stored on site at San Juan, the storage capacity, and the number of days of continuous operation of the ten (10) units that the current inventory supports under best-case and worst-case dispatch assumptions; describe the arrangements, and the time required, for replenishment and for the certification of delivered fuel; and identify any unit that is not presently capable of sustained operation on diesel, stating the reason and the corrective action planned.

D. Unit-by-Unit Information (All 14 TM2500 Units)

- 8. Provide the following information separately for each of the fourteen (14) turbine-generator units.
 - a) Unit identification: manufacturer; model designation; gas generator and package serial numbers; rated capacity; year of manufacture; date placed into commercial operation; current operational status (in service; available but not operating; out of service; under repair; permanently unavailable); and current condition and general assessment of the unit.
 - b) Operating history: total operating hours since commissioning; operating hours for each of the past three years; number of starts and stops for each of the past three years; number of forced outages for each of the past three years; number of planned outages for each of the past three years; equivalent availability, if available; capacity factor, if available; for units out of service, the last date the unit operated; current accumulated operating hours; and current accumulated starts. Provide support for operating logs or reports where available.
 - c) Maintenance history for at least the past three years: planned/preventive maintenance performed; corrective maintenance performed; major inspections; overhauls; component replacements; major repairs; emergency repairs; maintenance recommendations that remain outstanding; deferred maintenance; maintenance intervals established by the manufacturer; maintenance intervals followed; and any deviations from the manufacturer's recommended maintenance program. Provide copies of any available maintenance reports, inspection reports, work orders, service reports, maintenance logs, overhaul reports, technical reports, condition-monitoring reports, vibration-analysis reports, electrical testing reports, thermographic inspections, and other relevant diagnostic reports. For each unit, state the manufacturer's recommended interval for each major inspection milestone — including hot-section inspection of



exchange — together with the date, and the accumulated operating hours, at which each such milestone was last performed; the operating hours accumulated since; and, for any unit for which a milestone is past due, the date on which the past-due condition was first identified, the estimated cost and lead time of the work at that time, and each action taken since to procure and schedule it.

E. Annual Operations and Maintenance Expenditures — PSP Activity No. 1

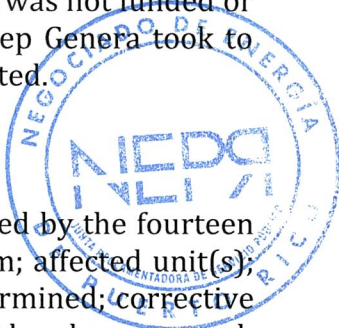
9. Provide the total amount spent on each unit and on the overall fleet for each of the past three fiscal years, broken down as follows:

Category	FY2024	FY2025	FY2026
Preventive maintenance			
Corrective maintenance			
Emergency repairs			
Major overhauls			
Spare parts			
Labor			
External contractors			
Engineering/technical services			
Other O&M expenses			
Total			

- a) Identify whether the expenditures were incurred directly by the operator or through an O&M contractor.
 - b) Provide costs by individual unit, rather than only as a fleet-wide total.
 - c) Provide the budget-to-actual for the \$17 million annual O&M allocation for FY2025 and FY2026, and state whether any portion of the allocation is attributable to units not sited between Palo Seco and San Juan (i.e., the difference between seventeen (17) funded units and fourteen (14) units in place). Identify any unspent balances and their disposition.
10. State whether, during the rate review proceeding (Case No. NEPR-AP-2023-0003), Genera requested any funding beyond the annual \$17 million O&M allocation for the repair of failed TM2500 units. If so, identify: the filing, exhibit, or testimony in which each request was made; the unit(s) and repairs involved; the amount requested; and the disposition of each request in the Final Rate Order. If no such request was made, explain why Genera did not seek such funding in the rate case notwithstanding the condition of the units.
11. Identify every request that Genera has made, since it assumed operation of the units, to PREPA or to any other entity for funding of TM2500 repairs or maintenance outside the annual operations and maintenance budget, including any request for the funding or replenishment of any forced-outage, extraordinary-repair, or similar reserve account established under the operative agreements. For each request, state the date, the amount, the units and scope of work involved, the account or mechanism invoked, and the response received. Provide the funding history and current balance of each such account and, where Genera contends that an account was not funded or replenished, identify the party responsible and describe each step Genera took to pursue the funding and every alternative source of funds it evaluated.

F. Most Common Problems and Failures

12. Provide a list of the most common technical problems experienced by the fourteen (14) units. For each problem, provide: description of the problem; affected unit(s); number of occurrences; date(s) of occurrence; root cause, if determined; corrective action taken; cost of repair; duration of outage; whether the problem has recurred; whether a permanent corrective action has been implemented; whether the problem



was reported to the manufacturer/OEM; whether the problem was covered by warranty; whether a warranty claim was submitted; and the status of any warranty claim. Distinguish between recurring problems and isolated failures.

G. Short-Circuit Failure and Fire Incident

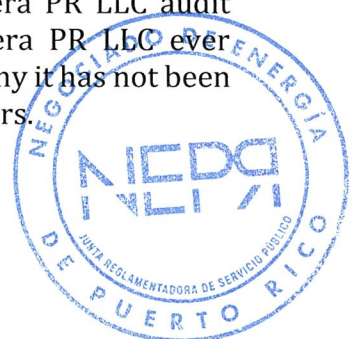
13. Provide an incident report including: unit identification; date and time of the incident; operating condition at the time of failure; description of the failure; location/component where the short circuit originated; cause of the short circuit; cause and extent of the resulting fire; equipment and components damaged; personnel safety impacts, if any; and duration of the resulting outage. Provide copies of the failure investigation report, root cause analysis (RCA), electrical investigation, fire investigation, inspection reports, photographs, testing results, manufacturer/OEM assessment, insurance investigation (if applicable), and any independent third-party investigation.
14. Describe in detail the corrective actions: how the damaged equipment was repaired or replaced; components replaced; testing performed following the repair; commissioning/recommissioning procedures; whether the unit returned to service; the date the unit returned to service; total repair cost; and total outage duration.
15. Identify all preventive actions taken to prevent recurrence, including: design modifications; protection-system modifications; electrical protection changes; relay/protection-setting changes; additional inspections; additional testing; changes to maintenance procedures; changes to operating procedures; replacement of similar components in other units; inspections of the remaining thirteen (13) units; recommendations issued to the other units; and any OEM recommendations. Indicate whether these preventive actions were implemented across all fourteen (14) units and provide documentation demonstrating completion.

H. Spare Parts

16. Provide a complete inventory of critical spare parts available for fourteen (14) units. For each spare part, provide: part description; part number; manufacturer/OEM; quantity available; location; condition; and date acquired.

I. Contractual Arrangements, Related-Party Costs, and Warranty Status

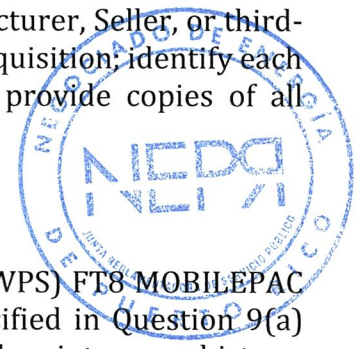
17. The rate case record (Case No. NEPR-AP-2023-0003) indicates that Genera put in place an intercompany agreement to permit certain parts and labor for the TM2500 units to be reimbursed as "passthrough" costs to a subsidiary of Genera's parent company, rather than as a fixed fee. Identify by full legal name each entity in the corporate chain from Genera PR LLC to the ultimate parent that receives or has received any portion of these passthrough payments and provide organizational charts showing each entity's ownership percentage.
18. Provide a complete ledger, by invoice, of all passthrough charges billed through the Intercompany Services Agreement from July 1, 2023, through the present, broken down by: (a) parts and materials; (b) labor; (c) specialized services; and (d) overhead or management fees, for each of the fourteen (14) TM2500 units individually.
19. Were the rates, markups, or pricing terms in the Intercompany Services Agreement established through an arm's-length process? Provide any benchmarking analysis, independent cost estimates, or comparable market-rate studies used to set intercompany pricing. If none exists, explain why not.
20. Section 3.2 of the Intercompany Services Agreement grants Genera PR LLC audit rights over Genera Services LLC's books and records. Has Genera PR LLC ever exercised this audit, right? If so, provide the results. If not, explain why it has not been exercised given the materiality of the passthrough costs to ratepayers.



21. Provide all inspection reports, condition assessments, and GE field service reports for each of the fourteen (14) TM2500 units covering the period from PREPA's acquisition through the present. Identify any unit that has experienced a major inspection milestone (Hot Section Inspection or Major Overhaul) and describe what was done.
22. As of the December 2025 hearing in Case No. NEPR-AP-2023-0003, Genera represented that 21 Field Operator Technicians, 9 Field Supervisors, and 1 Senior Gas Turbine SME, among others, support TM2500 operations, with staffing allocated across all units based on system needs rather than assigned per unit. Provide the current staffing matrix for TM2500 operations, including the number of personnel on each shift at Palo Seco and San Juan, and demonstrate how this staffing level is consistent with GE's recommended operations and maintenance staffing for aeroderivative turbines.
23. Identify the single contractor entity or group of entities providing TM2500-related professional services and labor, confirm whether they are affiliates of Genera or of New Fortress Energy, and provide the full text of each engagement or service agreement.
24. The March 15, 2024 Asset Purchase Agreement includes a side letter under which, upon written request of the Buyer no later than twelve (12) months following closing, the Seller would provide major maintenance for up to seven (7) units — expressly including repair and/or replacement of all parts identified as damaged or not serviceable while Hot Section major maintenance is performed — at the Seller's sole cost, with performance guaranteed by New Fortress Energy Inc.:
 - a) State whether Genera recommended, prepared, or was aware of any written request invoking this accommodation; identify the units for which it was requested; and provide the requests and all related correspondence.
 - b) For each major maintenance performed under the side letter, provide the completion certification from General Electric or a GE-qualified third party.
 - c) If the accommodation was not invoked or was invoked for fewer than seven (7) units, explain why, and identify who made that decision.
 - d) Explain why funding from ratepayer-sourced mechanisms is being sought for hot-section restoration of Palo Seco Units 3 and 4 — work of the same kind covered by the side letter — and state whether any claim was made against the Seller or its parent guarantor before seeking such funding.
 - e) Provide a complete accounting of every repair, replacement, or major maintenance performed on any of the fourteen (14) units at the cost of the Seller or any of its affiliates — whether under the side letter to the APA or under any similar accommodation, credit, or coupon arrangement contained in any other agreement or side letter — identifying, for each: the unit; the scope of work; the dates of performance; the party that bore the cost; and the completion certification obtained. State the number of such accommodations used to date and the number that remains available.
25. For each of the fourteen (14) units, state whether any manufacturer, Seller, or third-party warranty is or was in effect at any time since PREPA's acquisition; identify each warranty claim submitted, its amount, and its status; and provide copies of all warranty documentation.

J. FT8 MOBILEPAC Units at Palo Seco

26. For each of the three (3) Pratt & Whitney Power Systems (PWPS) FT8 MOBILEPAC gas turbine units in Palo Seco, provide the information specified in Question 9(a) through 9(c) above (unit identification; operating history; and maintenance history, with supporting documents).
27. Provide the annual operations and maintenance expenditures for the FT8 MOBILEPAC units for each of the past three fiscal years, broken down as follows:



Category	FY2024	FY2025	FY2026
Preventive maintenance			
Corrective maintenance			
Emergency repairs			
Major overhauls			
Spare parts			
Labor			
External contractors			
Engineering/technical services			
Other O&M expenses			
Total			

- a) Identify whether the expenditures were incurred directly by the operator or through an O&M contractor.
- b) Provide costs by individual unit, rather than only as a fleet-wide total.

28. Out of the 81 MW of installed capacity of the three (3) Pratt & Whitney Power Systems (PWPS) FT8 MOBILEPAC gas turbine units in Palo Seco, what aggregate capacity is currently available to the system operator?

PART II — QUESTIONS TO PREPA

29. The federal grant provided for the acquisition of the seventeen (17) TM2500 units, yet approximately 70 MW of that capacity remains unacquired. Explain the reasons why the completion of the purchase has not materialized, and provide the status of this acquisition, noting that this capacity is very much needed by the system.
30. Regarding the Purchase Option under Section 7.11 of the March 15, 2024 Asset Purchase Agreement, whose exercise window closed ninety (90) days following the closing date: state whether PREPA exercised the Purchase Option; if not, describe the "new arrangements" for the treatment of the non-acquired units on site discussed with the Seller pursuant to Section 7.11(e), the current location and custody of those units, and whether the Seller has demobilized or decommissioned them; and provide all related correspondence and agreements.
31. Provide the status of the FEMA funding contemplated under the Asset Purchase Agreement (up to ninety percent (90%) of the purchase price), including amounts obligated and disbursed to date, the status of the deferred payment, and any pending conditions.
32. State whether PREPA submitted the written request contemplated by the APA side letter for major maintenance of up to seven (7) units within twelve (12) months of closing; identify the units and dates; provide all related correspondence with NFE Power PR LLC and New Fortress Energy Inc.; and describe any steps taken to enforce the Seller’s obligations, including under the Section 9.5 parent guaranty. If no request was made, explain why.
33. Identify any claims made or considered under the representations, warranties, or indemnities of the Asset Purchase Agreement relating to the condition of the units, including the maintenance findings in the borescope reports referenced in the disclosure schedules, and provide the related documentation.
34. Describe the coordination between PREPA and Genera regarding the funding source for TM2500 repairs, including whether contractual remedies under the acquisition documents were evaluated before ratepayer-sourced funding mechanisms were pursued.

