

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-Attachment A-1

SUBJECT

FCA, PPCA, and FOS Proposed Factors

REQUEST

1. Have any errors or revisions been identified by Genera or LUMA that affect the FCA, PPCA, and FOS rates for October through December 2026 proposed by LUMA in LUMA's September 15, 2026, Motion and supporting documents?

- a. If "yes", please identify, quantify and explain each correction and revision to those rates that has been identified.

RESPONSE

Following LUMA's September 15, 2026, submission of the proposed Oct–Dec 2026 factors, on the afternoon of September 18, 2026, Genera shared a revised fuel report with updated August 2026 fuel costs. These revisions are not the result of any errors in LUMA's calculations, methodology, or supporting documentation as originally filed. The Fuel Charge Adjustment (FCA) costs changed solely because one of its source inputs—Genera's reported fuel cost—was subsequently revised. LUMA is submitting revised supporting documentation reflecting the updated FCA. LUMA updated the reconciliation, resulting in an increase of \$675.56.

Additionally, for transparency, several rows were added to the FCA and Purchased Power Charge Adjustment (PPCA) to show the application of the 1.51% uncollectible factor. As detailed in the Response to A-21, LUMA concluded that the uncollectible factor is not applicable to the FOS, given that the FOS constitutes a statutory subsidy and not a revenue-generating mechanism. Applying the factor would improperly inflate the subsidy without mitigating bad-debt exposure. Therefore, LUMA has reassessed its position and formally excluded the FOS from the 1.51% uncollectible factor.¹

The following tabs were updated in the Proposed Factors Workbook:

- Attachment 1: FCA Factor Calculation
- Attachment 2: PPCA Factor Calculation
- Attachment 4: FCA & PPCA Reconciliation based on Genera's post filing fuel report update

¹ As explained in the Response to A-21, LUMA identified the FOS issue during the preparation of the September 18 RFI response and had already removed the 1.51% uncollectible factor from the FOS prior to the September 21 and September 23 RFIs; these revisions also include updates to tabs, in compliance with item 3.4(b) of the September 23 Order.

Permanent Rate

- Attachment 5: Subsidy Riders (Annual Riders)
- Attachment 8: Bill Impact

Additionally, regarding the Accelerated Storage Addition Program (ASAP) Implementation Program tab, the figures reported in Lines D6, D7, and D8 in workbook *Oct_Dec_2026_Proposed_Factors* submitted on September 15, 2026 did not reflect the correct amounts. These illustrative figures have been updated in the revised workbook *Oct_Dec_2026_Proposed_Factors*, tab ASAP Implementation Program submitted today. The revisions do not impact the PPCA factor. The updated to the ASAP Implementation Program tab is intended solely to illustrate how the program's costs are recovered through the PPCA.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2

SUBJECT

Fuel Delivery

REQUEST

2. Has Genera experienced problems or delays in getting fuel delivered during June 2026 through August 2026? If so, please explain, providing specifics of fuel delivery issues that LUMA or Genera are experiencing.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-3

SUBJECT

Fuel Delivery

REQUEST

3. Is Genera expecting problems or delays in fuel deliveries during the October 2026 through December 2026 period? If so, please explain, providing specifics of expected fuel delivery issues. Also, specify and explain any contingency plans to assure that sufficient fuel will be delivered to the system during those months to avoid having outages attributable to insufficient fuel availability.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-4

SUBJECT

Force Majeure – Fuel Suppliers

REQUEST

4. Have Genera or PREPA received force majeure notifications from any fuel suppliers or fuel transporters in June 2026 through August 2026? If so, please identify and provide a copy of each such force majeure notification.

RESPONSE

This question is addressed to Genera and the Puerto Rico Electric Power Authority (PREPA). LUMA does not manage fuel supply or transportation contracts.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-5

SUBJECT

Force Majeure – Purchased Power Suppliers

REQUEST

5. Have LUMA or PREPA received force majeure notifications from any purchased power suppliers from June 2026 through August 2026? If so, please identify and provide a copy of each such force majeure notification.

RESPONSE

Regarding purchased power suppliers, LUMA manages Generation Supply Contracts as agent of the Puerto Rico Electric Power Authority (PREPA) pursuant to the Transmission and Distribution System Operation Agreement². LUMA has not received force majeure notifications from purchased power suppliers during June 2026 through August 2026.

² Pursuant to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (T&D OMA) executed on June 22, 2020, among the Puerto Rico Electric Power Authority (PREPA), the Puerto Rico Public-Private Partnerships Authority (P3A) and LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, "LUMA").

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-6

SUBJECT

Transmission System Outages

REQUEST

6. During the reconciliation months of June 2026 through August 2026:
- Were there any transmission system outages that prevented generation from being supplied to serve electric load?
 - If the answer to part a is "yes" identify each transmission system outage in each month, June 2026, July 2026, and August 2026, that affected the system's ability to transmit power generated and purchased to serve electricity demand.

RESPONSE

- Yes. There were three transmission system outages events that prevented generation from being supplied to serve electric load.
- The two transmission system outages are the following:
 - Event #1 – 15 August 2026 - EcoEléctrica units not available due to Line 51100 trip caused by a neutral feeder conductor who came into contact with the line due to wind gust.
 - Event #2 – 30 August 2026 - Costa Sur Steam Plant (SP) 5 and 6 not available due to failure in 115kV switchyard.
 - Event #3 – 5 August 2026 – Costa Sur 6 tripped with 130 MW due to unit differential protection failure related to BKR 0022.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-7

SUBJECT

Unplanned or Forced Outages

REQUEST

7. During the reconciliation months of June 2026, July 2026, and August 2026:
- Were any generating units unavailable due to unplanned or forced outages?
 - If the answer to part a is "yes," identify each forced/unplanned outage in June 2026, July 2026, and August 2026 by generating unit, date, time, and duration. Also explain the cause of each such outage and identify, quantify, and explain how it affected fuel and purchased power costs for each month. Include supporting calculations.
 - For the forced/unplanned outages identified in response to part b, does LUMA or Genera have any analysis, calculations, or estimates of the impact on monthly fuel costs and monthly purchased power costs related to those outages, including estimates of the amounts of fuel costs saved by not running the units that experienced the forced outages, and estimates of the additional costs for the replacement power? If not, explain why not.
 - If the response to part c is "yes," please identify and provide the analyses, calculations, and estimates that LUMA and Genera have relating to the impact of those forced/unplanned outages on monthly fuel cost and monthly purchased power cost for June 2026, July 2026, and August 2026.
 - For the forced/unplanned outages identified in responses to the above subparts, does LUMA or Genera have any analysis of the cause of those outages? If not, explain why not.
 - If the response to part e is "yes," please identify and analyze the causes of each of those forced/unplanned outages.

RESPONSE

- During the months of June through August 2026, yes—there were generating units unavailable due to unplanned or forced outages.
- For this response, please refer to the table and explanation below.

Permanent Rate

Table 7-1. June, July, and August 2026 Unplanned or Forced Outages

Units	Date	Start Time	End Time	Duration	Cause (as reported by Genera, PR or IPP)
Palo Seco 3	01-jun	1/6/26 10:21 PM	4/6/26 11:56 AM	2 days & 13 hours & 35 min	Boiler Rupture.
AES 1	09-jun	9/6/26 5:11 AM	11/6/26 11:27 PM	2 days & 18 hours & 16 min	Rupture in the FBHE.
AES 2	10-jun	10/6/26 11:31 AM	10/6/26 2:31 AM	3 hours	Work on an inverter and they lost all the auxiliary equipment.
AES 2	13-jun	13/6/26 8:22 AM	13/6/26 8:52 AM	30 Min	Problem with a BFWP.
San Juan 5 CC	13-jun	13/6/26 11:24 PM	15/6/26 8:13 AM	1 day & 8 hours & 49 min	Problem with raw water supply from PRASA and low levels in demineralized water storage.
San Juan 9	17-jun	17/6/26 11:24 PM	TBD	TBD	Opacity & fire in boiler side C.
Palo Seco 3	24-jun	24/6/26 11:38 AM	24/6/26 3:26 AM	3 hours & 48 min	Problems with boiler airflow transmissors.
San Juan 7	28-jun	28/6/26 8:18 PM	29/6/26 7:48 PM	23 hours & 30 min.	Cause under investigation.
San Juan 7	30-jun	30/6/26 9:19 AM	2/7/26 12:26 PM	2 days & 3 hours & 7 min	Turbine balancing, Bunker C leak repairs and hydraulic leak in piston of right interceptor valve
San Juan 7	02-jul	2/7/26 12:32 PM	15/7/26 2:45 PM	13 days & 2 hours & 13 min	Boiler Rupture.
Costa Sur 6	05-jul	5/7/26 9:27 PM	6/7/26 10:46 PM	1 day & 1 hour & 19 min	Turbine's vibration protection activated by the MARK VI turbine control system.
Palo Seco 4	09-jul	9/7/26 12:12 AM	13/7/26 9:29 AM	4 days & 9 hours & 17 min	Boiler Rupture.
AES 2	09-jul	9/7/26 9:53 AM	9/7/26 10:52 AM	59 min	Loss of BFP 2B due to a false indication of high temperature in one of its bearings and unit did not maintain its operational parameters with the BFP 2A.
San Juan 7	15-jul	15/7/26 3:36 PM	19/7/26 12:13 PM	3 days & 20 hours & 37 min	Boiler Rupture.
Palo Seco 4	16-jul	16/7/26 2:22 AM	18/7/26 9:34 PM	2 days & 19 hours & 12 min	Boiler Rupture.
Costa Sur 5	16-jul	16/7/26 12:56 PM	19/7/26 1:52 PM	3 days & 56 hours	Problems with control systems and boiler rupture.
Costa Sur 6	16-jul	16/7/26 8:15 PM	5/8/26 1:38 PM	19 days & 17 hours & 23 min	Unknown cause.
Palo Seco 4	19-jul	19/7/26 2:08 AM	21/7/26 7:59 PM	2 days & 17 hours & 51 min	High conductivity in the condenser.
San Juan 6	21-jul	21/7/26 3:00 PM	21/7/26 5:19 PM	2 hours & 19 min	Problem with deaerator regulator.

Permanent Rate

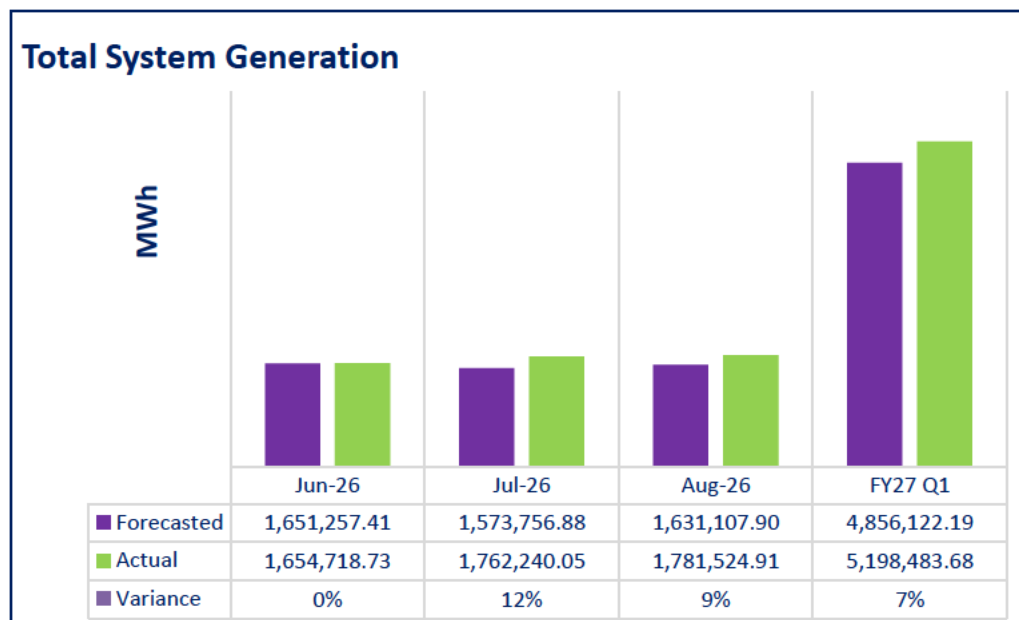
EcoElectrica CT 1	22-jul	22/7/26 11:23 AM	23/7/26 2:41 AM	15 hours & 18 min	Failed in the AVR.
Costa Sur 5	22-jul	22/7/26 5:44 PM	22/7/26 9:46 PM	4 hours & 2 min	Personnel were going to take out of service the hydraulic system of Costa Sur 6 control valves and by mistake took out of service the one of Costa Sur 5 instead, causing that turbine's control valves of Costa Sur 5 close and trip the unit. Hydraulic control system of Costa Sur 5 was reestablished.
San Juan 6	26-jul	26/7/26 2:26 PM	27/7/26 5:45 PM	1 days & 3 hours & 19 min	Possible repair on the condenser.
EcoElectrica CT 1	28-jul	28/7/26 8:22 PM	28/7/26 11:33 PM	3 hours & 11 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip.
EcoElectrica CT 2	28-jul	28/7/26 8:22 PM	29/7/26 8:01 AM	11 hours & 39 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip. Steam unit synchornized at 10:02 h.
Aguirre 2	28-jul	28/7/26 8:02 PM	29/7/26 1:36 AM	5 hours & 34 min	High amperage in vacuum pump 2-2 and low vacuum in condenser and then decided to forcedly shut down the unit to avoid a failure in motor of vacuum pump 2-2.
Aguirre 2	31-jul	31/7/26 6:27 PM	1/8/26 1:19 AM	6 hours & 52 min	Problems with control valve.
San Juan 6	02-ago	2/8/26 6:30 PM	3/8/26 12:57 PM	18 hours & 27 min	Problem of diodes and fuses burned.
San Juan 6	03-ago	3/8/26 2:24 PM	3/8/26 6:08 PM	3 hours & 44 min	Exciter cooling fan failure.
Costa Sur 6	05-ago	5/8/26 3:29 PM	8/8/26 2:21 PM	2 days & 22 hours & 52 min	Wrong connections in Current Transformer Circuits of breaker 0022 associated with unit differential protection
Palo Seco 3	07-ago	7/8/26 4:23 AM	10/8/26 10:42 PM	3 days & 18 hours & 19 min	Problems with cooling fans 2-3 and boiler rupture.
Palo Seco 4	09-ago	7/8/26 6:19 PM	7/8/26 8:09 PM	1 hour & 50 min	Bunker C trip valve closed due to a malfunction.
Palo Seco 3	10-ago	10/8/26 10:43 PM	11/8/26 12:27 AM	1 hour & 44 min	Cause under investigation.
Palo Seco 3	11-ago	11/8/26 1:17 AM	11/8/26 11:10 AM	9 hours & 53 min	High temperature in bearing #4 of the turbine.
San Juan 7	11-ago	11/8/26 7:13 AM	11/8/26 8:36 PM	13 hours & 23 min	Cause under investigation.
AES 2	11-ago	11/8/26 3:56 PM	16/8/26 5:11 PM	5 days & 1 hour & 15 min	Boiler Rupture.

Permanent Rate

San Juan 5 CC	11-ago	11/8/26 11:04 PM	12/8/26 7:01 PM	19 hours & 57 min	Low vacuum in condenser.
San Juan 7	14-ago	14/8/26 11:57 PM	TBD	TBD	High vibration in the turbine.
EcoElectrica	15-ago	15/8/26 5:08 PM	16/8/26 2:29 AM	9 hours & 21 min	Trip of Line-51100 Costa Sur SP - EcoEléctrica caused by a neutral feeder conductor came into contact with the line due to wind gust.
AES 1	16-ago	16/8/26 7:47 PM	16/8/26 9:37 PM	1 hour & 50 min	Operational problem with vacuum system.
AES 2	16-ago	16/8/26 7:47 PM	17/8/26 3:32 AM	7 hours & 45 min	Operational problem with vacuum system.
Costa Sur 5	30-ago	30/8/26 2:40 PM	31/8/26 4:42 PM	1 day & 2 hours & 2 min	Loss of BCWPs that were energized through the ESST.
Costa Sur 6	30-ago	30/8/26 2:40 PM	2/9/26 11:11 AM	2 day & 20 hours & 31 min	Loss of BCWPs that were energized through the ESST.

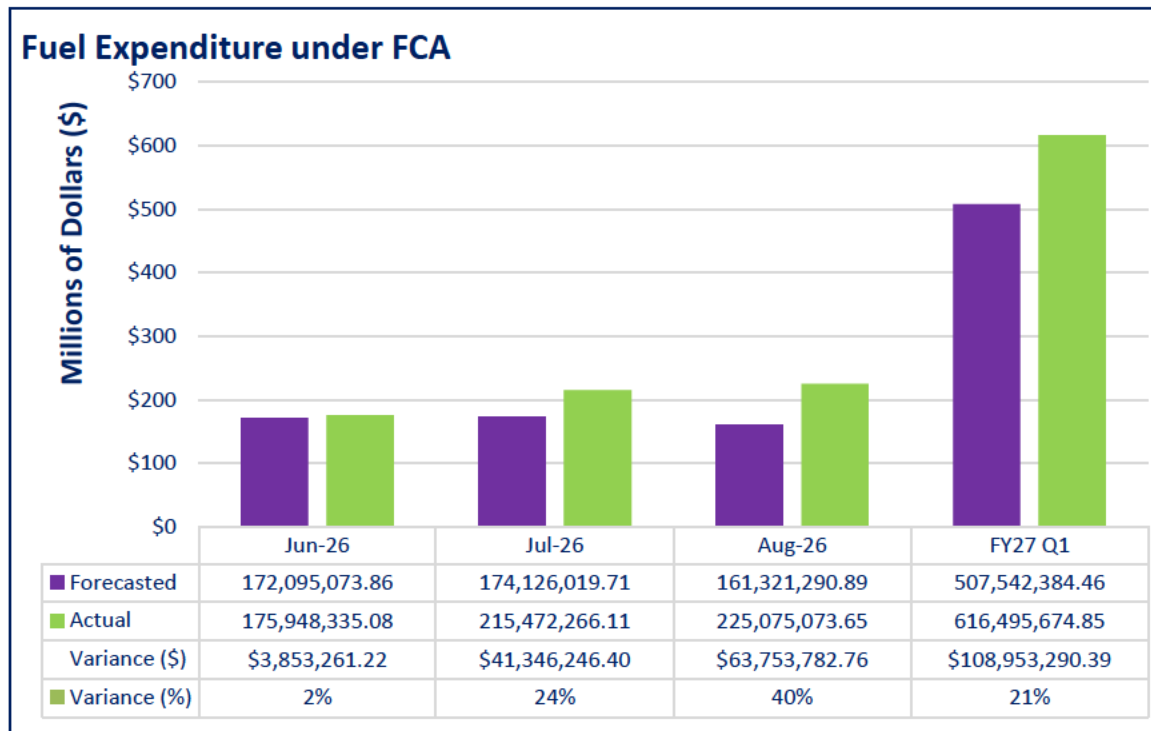
As stated in part (c), LUMA does not prepare reporting on the economic impact of specific forced outage events. During the months of June, July, and August 2026 there was significantly higher than forecasted fuel expenditure (see Figure 7-2 below). While the previously listed outage events contributed to variance in a facilities' share of system generation which has an impact on totally system fuel expenditure, a majority of the variance was due to higher system generation caused by higher demand during these months (see Figure 7-1 below) which results in greater usage of Peaker facilities to meet demand.

Figure 7-2. June, July, and August 2026 Total System Generation (MWh)



Permanent Rate

Figure 7-2. June, July, and August 2026 Fuel Expenditure under FCA



- c. No. LUMA does not prepare reporting on the economic impact of specific forced outage events. LUMA does prepare a monthly report titled *Fuel & Purchased Power Drivers Report* that analyzes the variance in generation plant performance from the Fuel Charge Adjustment (FCA) forecasted values and their impact on Fuel and Purchased Power expenditures on a monthly basis. However, this analysis does not isolate the economic impact of specific forced outage events and instead analyzes the economic impact of total monthly variance from the FCA forecasted values which is caused by all types of operational and performance characteristics that stray from forecasted assumptions. This is performed to cover all operational differences from forecasts that affect the reconciliation process and contributes to the determination of the FCA and Purchased Power Charge Adjustment (PPCA) riders during the reconciliation process.
- d. The answer to part (c) is no.
- e. No. LUMA does not operate generation assets and, therefore, does not perform outage root-cause analysis.³
- f. The answer to part (e) is no.⁴

³ On September 22, 2026, Genera requested an extension of time until September 24, 2026, to answer this subpart.

⁴ *Id.*

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-8

SUBJECT

Unplanned or Forced Outages

REQUEST

8. During September 2026, have there been any unplanned or forced outages? If yes, identify each forced/unplanned outage by generating unit, date, time, and duration.
- Are the September 2026 forced/unplanned outages expected to extend beyond September 30, 2026, and into October 2026 or beyond? If so, explain fully.
 - If the answer to part a is "yes," how did LUMA and Genera consider the continuing generating unit outages in projecting fuel and purchased power cost for October through December 2026?

RESPONSE

Yes. During September 2026, there have been unplanned or forced outages. The following table identifies each event by generating unit, date, time, and duration:

Table 8-1 Unplanned or Force Outages (Sep 2026)

Units	Date	Start Time	End Time	Duration	Cause (as reported by Genera PR or IPP)
San Juan 6	1-Sep	1/9/26 5:16 PM	2/9/26 9:01 AM	15 hours & 45 min	Loss of BFP 6-B which was energized through the ESST 5&6. Unit was started again but, unit couldn't be synchronized due to problems with MW/MVAR meter that apparently is not working.
San Juan CC STM 5	1-Sep	1/9/26 6:42 PM	1/9/26 8:49 PM	2 hours & 7 min	Problems with water control valve.
Palo Seco 4	10-Sep	10/9/26 1:14 AM	11/9/26 8:05 AM	1 days & 6 hours & 51 min	Boiler Rupture.
Costa Sur 5	11-Sep	11/9/26 4:03 PM	15/9/26 2:47 PM	3 days & 22 hours & 44 min	Problems with FCV1.
Costa Sur 6	12-Sep	12/9/26 7:16 AM	13/9/26 2:44 AM	19 hours & 28 min	Problems with main steam valve.
AES 1	12-Sep	12/9/26 7:46 AM	17/9/26 11:30 PM	5 days & 15 hours & 44 min	Rupture in heat exchanger.

Permanent Rate

San Juan CC 5	14-Sep	14/9/26 11:32PM	14/9/26 2:47 PM	15 hours & 15 min	Problems with turbine combustion control system.
Aguirre 2	14-Sep	14/9/26 6:16 PM	20/9/26 12:36 AM	5 days & 6 hours & 20 min	Boiler Rupture.
Eco Electrica CT 2	18-Sep	18/9/26 11:00PM	18/9/26 1:53 PM	2 hours & 53 min	Human error.

- a) As of September 24, 2026, no – there have been no unplanned or forced outages that extended to September 24 or later.
- b) The answer to part (a) is no.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-9

SUBJECT

System Constrains

REQUEST

9. In June 2026, July 2026, and August 2026, were any generating units run for system reliability reasons and/or because of system constraints outside of normal economic dispatch in which the highest variable cost units are called upon first to meet load? If so, identify the days and hours in which non-economic dispatch occurred and explain the related reasons.

RESPONSE

During June, July, and August 2026, no generating units were dispatched outside of normal economic merit order due to system-wide security constraints or reliability-related conditions that required deviation from security-constrained economic dispatch. Overall system operations remained within established reliability criteria throughout the reporting period, and no instances were identified in which higher-variable-cost units were committed or dispatched strictly for non-economic reasons. With respect to generation output, any observed increases in production during the period were attributable to higher system demand levels and, at times, the unavailability of units due to forced outages. In terms of cost variances, the principal contributing factors were changes in fuel commodity costs and load levels that exceeded forecasted demand. See Figures 7-1 and 7-2 for supporting data.

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-10

SUBJECT

Purchased Power Resources

REQUEST

10. In June 2026, July 2026, and August 2026, were there any hours in which sufficient generating and purchased power resources were not available to meet system demand for electricity? If so, identify the days and hours in which the available generating and purchased power resources were insufficient to supply the system demand for electricity and explain the related reasons sufficient resources were not available during those hours.

RESPONSE

Yes. The following table 10-1 identifies the hours in June 2026, July 2026 and August 2026, in which available generating and purchased power resources were insufficient to meet the system demand for electricity. The table also provides the specific days and hours of insufficient resources, along with the corresponding reasons these resources were not available during these periods.

Table Error! No text of specified style in document.0-3. Hours of Insufficient Generation and Purchased Power (June–August 2026)

Date	Starting Time	Ending Time	Duration	Explanation
5-Jul	5/7/26 9:28 PM	5/7/26 10:49 PM	1 hours 21 min	Provided by Genera: Unit costa sur 6 experienced a forced outage at 21:27 h due to a turbine's vibration protection activated by the MARK VI turbine control system. Their MARK VI expert is in troubleshooting process to determine the root cause of the trip.
9-Jul	9/7/26 9:50 AM	9/7/26 10:08 AM	18 min	Provided by AES: Unit AES 2 started to ramp down from 248 MW gross at 09:45 h to 49 MW gross at 09:53 h and tripped at 09:53 h with approximately 49 MW gross.
16-Jul	16/7/26 8:23 PM	16/7/26 11:41 PM	3 hours 18 min	Provided by Genera: Costa Sur 5 suddenly ramped down from 249 MW at 12:50:52 h to 13 MW at 12:51:25 h and after ramping up to 156 MW tripped with 114 MW at 12:56:20 h due to problems with units control system and during this event the unit experienced a boiler rupture.
17-Jul	17/7/26 5:18 PM	18/7/26 12:16 AM	6 hours 58 min	Generation shortfall.
18-Jul	18/7/26 5:50 PM	18/7/26 11:34 PM	6 hours 26 min	Generation shortfall.

RESPONSES TO SEPTEMBER 18, 2026, REQUESTS

Permanent Rate

19-Jul	19/7/26 7:56 PM	19/7/26 11:03 PM	3 hours 7 min	Generation shortfall.
21-Jul	21/7/26 4:01 PM	16/7/26 4:38 PM	37 min	Provided by Genera: San Juan 6 tripped with 113 MW at 16:00:38 h due to problem with deaerator regulator.
22-Jul	22/7/26 5:44 PM	22/7/26 11:38 PM	5 hours 54 min	Generation shortfall.
28-Jul	28/7/26 7:29 PM	29/7/26 1:43 AM	6 hours 14 min	Generation shortfall.
5-Aug	5/8/26 4:29 PM	5/8/26 8:48 PM	4 hours 19 min	Provided by Genera: Costa Sur 6 experienced a forced outage at 16:29 h cause is under investigation.
10-Aug	10/8/26 7:27 PM	10/8/26 9:48 PM	2 hours 21 min	Generation shortfall.
15-Aug	15/8/26 5:11 PM	16/8/26 1:57 AM	8 hours 46 min	Generation shortfall.
16-Aug	16/8/26 7:51 PM	16/8/26 10:38 PM	2 hours 49 min	Provided by AES: Unit AES 2 tripped at 19:47 h due to an operational problem with vacuum system.
30-Aug	30/8/26 2:44 PM	30/8/26 3:38 PM	54 min	Both Costa Sur units tripped AT 14:40 h due to loss of BCWPs that were energized through the ESST 5&6 Costa Sur SP and the preliminary cause of trip as informed by Genera PR was high differential in the boiler's pressure.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-11

SUBJECT

Economic Fuels

REQUEST

11. In June 2026, July 2026, and August 2026, were there any days in which the most economical fuel source (e.g. LNG) was not available in sufficient quantities to enable full economic generation at any generating units? If so, identify the days during which the most economical fuel source was not available, and a higher cost fuel was used for generation. Also, explain the related reasons the most economic fuel source was not available to those generating units during those days.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-12

SUBJECT

Fuel Supply Contracts

REQUEST

12. In June 2026, July 2026, and August 2026, were any new fuel supply contracts entered into for supply of natural gas or other fuel types? If yes, provide the following information:
- a. A copy of the contract, including pricing, quantities, and delivery terms.
 - b. The names and job titles of the persons who negotiated the contract.
 - c. Whether the persons identified in response to part b are employed by affiliated entities or related parties, and, if so, an explanation of affiliated relationship.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-13

SUBJECT

EcoEléctrica

REQUEST

13. In June 2026, July 2026, and August 2026, were there any constraints on the power being supplied to the system by EcoEléctrica?

- a. Did the power supplied by EcoEléctrica during any of those months deviate from the projections? If so, please identify, quantify, and explain those constraints and deviations.

RESPONSE

Yes. Between June and August 2026, constraints affected the power supplied by EcoEléctrica, including outages that occurred during this three-month period. Details of the forced outage events at EcoEléctrica are provided in response to Question A-14.

- a. Refer to Table 13-1 below for the monthly difference between forecasted and actual generation values at EcoEléctrica, along with the reasons for deviations from the forecasted values.

Table 13-1. Forecast vs. Actual Generation Variances – EcoEléctrica

Month	Forecasted Generation (MWh)	Actual Generation (MWh)	Generation Difference (MWh)	Explanation
June 2026	289,252.94	269,053.25	-20,199.69	Lower capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation and system conditions.
July 2026	291,321.78	274,723.56	-16,598.22	Lower capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation. Additionally, as reported by EcoEléctrica, EcoEléctrica CT-1 experienced a forced outage event on July 22nd due to a failure detected in the AVR, and CT-1 and CT-2 experienced forced outage events on July 28th due to a differential exhaust temperature trip.
August 2026	278,729.00	271,484.72	-7,244.28	Lower capacity factor than forecasted due to a variety of factors such as the impact of frequency regulation. Additionally, as reported by EcoEléctrica, a Total Plant Shutdown took place on August 15th due to a transmission line fault.

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-14

SUBJECT

EcoEléctrica

REQUEST

14. For June 2026, July 2026, and August 2026, were there any days or hours in which power to the system could not be supplied by EcoEléctrica?

- a. If so, please identify those days and hours and explain what prevented the EcoEléctrica power from being supplied.

RESPONSE

Yes, please refer to table 14-1 below, which outlines any days or hours in June 2026, July 2026, and August 2026 in which EcoEléctrica's power could not be supplied, along with the corresponding explanations.

Table 14-1. EcoEléctrica's Power Unavailability by Day and Hour (June-August 2026)

Units	Date	Start Time	End Time	Duration	Cause reported by EcoEléctrica
EcoEléctrica CT 1	22-Jul	22/7/26 11:23 AM	23/7/26 2:41 AM	15 hours & 18 min	Failed in the AVR.
EcoEléctrica CT 1	28-Jul	28/7/26 8:22 PM	28/7/26 11:33 PM	3 hours & 11 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip.
EcoEléctrica CT 2	28-Jul	28/7/26 8:22 PM	29/7/26 8:01 AM	11 hours & 39 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip.
EcoEléctrica	15-Aug	15/8/26 5:08 PM	16/8/26 2:29 AM	9 hours & 21 min	Trip of Line-51100 Costa Sur SP - EcoEléctrica caused by a neutral feeder conductor came into contact with the line due to wing gust.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-15

SUBJECT

Customer Battery Energy Sharing (CBES)

REQUEST

15. As of August 31, 2026, what amount of cumulative differences between (1) actual and (2) forecast amounts for Customer Battery Energy Sharing (CBES and CBES+) does LUMA show?

RESPONSE

As of August 31, 2026, LUMA reports the following cumulative variances between forecasted and actual Customer Battery Energy Sharing:

- For June 2026, the forecast was \$882,456, compared to an actual amount of \$273,830.51.
- For July 2026, the forecast was \$967,005.00, compared to an actual amount of \$2,175,095.85.
- For August 2026, the forecast was \$1,926,393.81, compared to an actual amount of \$5,669,412.67.

Across the three-month period, these variances result in a cumulative difference of \$4,342,484.22 between actual and forecasted.

These variances are provided in workbook *Oct_Dec_2026_Proposed_Factors*, tab "CBES Program Costs & Forecast".

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment
A-16

SUBJECT

Accelerated Storage Addition Program (ASAP)

REQUEST

16. For the Accelerated Storage Addition Program (ASAP), what is the cumulative differences for the ASAP (1) invoiced actual amounts and (2) LUMA's forecasted ASAP amounts through August 31, 2026?

RESPONSE

Please refer to Table 16-1 below for the cumulative differences between the Accelerated Storage Addition Program (ASAP) invoiced actual amounts and LUMA's forecasted ASAP amounts through August 31, 2026.

Table 16-1. ASAP Actual vs. Forecast Differences Through August 31, 2026

Expenses incurred Costs [Month by Month]	Forecasted Cost (\$)	Actuals (\$)	Variance (\$)	YTD Budget (\$)	YTD Actuals (\$)	YTD Variance (\$)
Expended through December 31, 2025	██████████ ⁵	██████████	██████████	██████████	██████████	██████████
Jan-26	██████████	██████████	██████████	██████████	██████████	██████████
Feb-26	██████████	██████████	██████████	██████████	██████████	██████████
Mar-26	██████████	██████████	██████████	██████████	██████████	██████████
Apr-26	██████████	██████████	██████████	██████████	██████████	██████████
May-26	██████████	██████████	██████████	██████████	██████████	██████████
Jun-26	██████████	██████████	██████████	██████████	██████████	██████████
Jul-26	██████████	██████████	██████████	██████████	██████████	██████████

⁵ By Resolution and Order in Case No. NEPR-MI-2024-0002 dated March 5, 2025, the Energy Bureau approved the filing of ASAP costs in this docket (NEPR-MI-2020-0001) commencing with a filing of March 17, 2025, and approved the submittal of the costs for the months of December 2024, January 2025 and February 2025 in that filing. Therefore, the actual costs, rather than forecasted costs for the months of December 2024, January 2025, and February 2025 for ASAP were submitted in the March 17, 2025 filing in this docket. LUMA estimated that the costs for these months would be ██████████, respectively, in its filing of February 28, 2025 in Case No. NEPR-MI-2024-0002. See Informative Motion and to Submit Estimate of Costs for ASAP in Compliance with Resolution and Order of January 14, 2025, and Request for Confidential Treatment.

RESPONSES TO SEPTEMBER 18, 2026, REQUESTS

Permanent Rate

Aug-26		⁶						
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These variances are provided in workbook *Oct_Dec_2026_Proposed_Factors*, tab “ASAP Implementation Program”.

⁶ The forecasted cost for August 2026 is set at \$10,000 because consultant invoicing temporarily paused during July and early August while LUMA and its external advisers negotiated an extension of the consulting contract. As detailed in Exhibit 1 – ASAP Costs Breakdown, September 2026 Quarterly Filing, the consultant forecast originally assigned to August 2026 was redistributed across the remaining months of the reporting period (October, November, and December) to keep total forecasted expenses aligned with the Energy Bureau-approved Optimistic Case estimates and the authorized cost recovery limit. As a result, only legal forecasted services of \$10,000 remained for August 2026.

Permanent Rate

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-17

SUBJECT

Fuel Delivery

REQUEST

17. In June 2026, July 2026, and August 2026, were any incoming fuel deliveries diverted to another delivery location (e.g., because of delivery site conditions, weather or other causes)?

a. If so, please identify with specificity which fuel deliveries were diverted and include a short explanation of why the delivery diversion occurred and whether it impacted plant operations and generation availability.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-18

SUBJECT

Natural Gas Shortfalls

REQUEST

18. In June 2026, July 2026, and August 2026, were there any shortfalls in nominated/contracted natural gas deliveries?

a. If so, what was the dollar impact on fuel cost in each month, June 2026, July 2026, and August 2026, due to the reduced natural gas deliveries, such as but not limited to creating a need for increased reliance on diesel-fueled related peaking units to compensate for the lack of natural gas fueled generation? Explain fully and provide all related analysis and calculations of the related fuel cost impacts for each month.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2026, Genera requested an extension until September 24, 2026 to answer this request.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-19

SUBJECT

FCA, PPCA, and FOS Proposed Factors

REQUEST

19. Did LUMA include any provision for uncollectible in its proposed FCA or PPCA factors to become effective on October 1, 2026? If so, what dollar amounts and what uncollectible percentage was used?

RESPONSE

Yes, LUMA did include an uncollectible amount for the Fuel Charge Adjustment (FCA), Purchased Power Charge Adjustment (PPCA). The uncollectible percentage used is 1.51% as ordered in the April 15, 2026, Final Resolution and Order in Electricity Rates.⁷ The total dollar amount was \$13.3 million, consisting of \$10.6 million for the FCA and \$2.7 million for the PPCA.

As detailed in the Response to A-21, LUMA concluded that the uncollectible factor is not applicable to the Fuel Oil Subsidy (FOS), given that the FOS constitutes a statutory subsidy and not a revenue-generating mechanism. Applying the factor would improperly inflate the subsidy without mitigating bad-debt exposure. Therefore, LUMA has reassessed its position and formally excluded the FOS from the 1.51% uncollectible factor.

Revisions are reflected in workbook *Oct_Dec_2026_Proposed_Factors*, tab “Attachment 1”, and “Attachment 2”.

⁷ Page 11, Chapter Six: Systemwide Costs of Final Resolution and Order dated April 15, 2026, Docket No. NEPR-AP-2023-0003.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-20

SUBJECT

Disputed Fuel Costs

REQUEST

20. The following follows up on the potential impact of disputed fuel costs identified in the Energy Bureau's December 19, 2025, Resolution and Order:

- a. Referring to the Energy Bureau's December 19, 2025, Resolution and Order: Is LUMA, PREPA or Genera aware of any ongoing disputes against suppliers of natural gas to the system?
- b. Is the dispute with NFE natural gas supply to the system identified in the Energy Bureau's December 19, 2025, Resolution and Order ongoing as of September 16, 2026?
- c. If the response to part b is "no", when was it resolved? Please identify and provide the documentation containing the resolution of the dispute with NFE identified in the Energy Bureau's December 19, 2025, Resolution and Order.
- d. If the response to part b is "yes" please identify, quantify and explain how LUMA has continued to reflect the deferral of the \$55 million of disputed NFE natural gas costs. Also explain the status of the dispute.

RESPONSE

Subparts a through c are addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

For item (d) – The \$55 million remain unbilled to customers, in full compliance with the Energy Bureau's order.⁸ LUMA continues to withhold invoicing these amounts until the pending dispute is formally resolved. LUMA is not a party to the referred dispute.

⁸ Resolution and Order of December 19, 2025, Docket No. NEPR-MI-2020-0001.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-21

SUBJECT

Bad Debt

REQUEST

21. Please explain the 1.0151 factor used in calculating the FCA, PPCA, and FOS rates. Include all documentation and calculations that support the 1.0151 factor.

RESPONSE

On its, September 15, 2026, filing LUMA applied the 1.51% uncollectible accounts factor to the forecasted costs and reconciliation components of the Fuel Charge Adjustment (FCA), Purchased Power Charge Adjustment (PPCA), and the Fuel Oil Subsidy (FOS), consistent with the Energy Bureau's Final Rate Order, of April 15, 2026.⁹ During the preparation of these responses, and prior to the September 21 and September 23 RFI's, LUMA conducted a further review of the applicability of the uncollectible factor to the FOS. Based on this review, LUMA has determined that the uncollectible factor should not be applied to the FOS and has accordingly excluded it from the revised set of factors. This determination is based on the regulatory nature and purpose of the FOS.¹⁰ The Fuel Oil Subsidy is a direct governmental subsidy established to reduce the energy burden for qualifying residential customers, including subsidized General Residential Service (GRS), Lifeline Residential Service, and Public Housing residential customers. Because the FOS is a policy-driven subsidy intended to provide targeted bill relief, applying an uncollectible factor would increase the cost of the subsidy itself rather than address or mitigate uncollectible accounts. In practice, adding an uncollectible factor would artificially inflate the subsidy credit applied to participating customers, resulting in higher subsidy expenditures without contributing to the recovery of actual uncollectible expenses.

This filing incorporates a revised set of quarterly factors that excludes the FOS from the application of the 1.51% uncollectible factor. Additionally, the filing includes a separate line-item identifying the incremental ¢/kWh impact of applying the bad-debt factor to the FCA and PPCA only. The impacts amount to 0.2689¢/kWh for the FCA and 0.0681¢/kWh for the PPCA, for a combined total impact of 0.3369¢/kWh. The detailed calculations are provided in *Oct_Dec_2026_Proposed_Factors*, tab Attachment 1 (Line No. 19) and tab Attachment 2 (Line No. 17).

⁹ Page 5, Chapter Six: Systemwide Costs of Final Resolution and Order dated April 15, 2026, Docket No. NEPR-AP-2023-0003.

¹⁰ LUMA notes that the identification and correction of the FOS issue, including the removal of the 1.51% uncollectible factor, were completed as part of the September 18 RFI response, prior to the issuance of the September 21 and September 23 RFIs, and the corresponding revisions incorporate updates to tab [xxx] in compliance with item 3.4(b) of the September 23 Order.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-202609XX-PREB-Attachment A-22

SUBJECT

Natural Gas Nominations

REQUEST

22. For June 2026, July 2026, and August 2026, please provide the monthly and daily/day-ahead natural gas nominations submitted by Genera to Naturgy and to NFE, respectively, including all supporting workpapers, calculations, and load and unit-dispatch forecasts used to determine each nominated volume.

- a. Identify the individual(s) or department responsible for preparing, reviewing, and approving each nomination, and describe the internal process and approval timeline followed.
- b. For each month, state whether the nominated volumes were confirmed in full, confirmed in part, or rejected by Naturgy and/or NFE, and provide all related nomination confirmations, rejections, curtailment notices, or other correspondence exchanged with each supplier.
- c. If any nominations were confirmed in part or rejected, explain in detail the reasons given by Naturgy and/or NFE, and quantify the volume (in MMBtu or other applicable unit) and dollar impact of the resulting shortfall in each month.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered 22(a) on September 22, 2026 and requested an extension until September 24, 2026 to answer subparts b-c.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-23

SUBJECT

Natural Gas Nominations

REQUEST

23. For June 2026, July 2026, and August 2026, please provide a monthly comparison, by supplier (Naturgy and NFE), of (i) the volume of natural gas nominated, (ii) the volume confirmed/scheduled, and (iii) the volume actually delivered and consumed, together with an explanation of any variances among those three figures.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-24

SUBJECT

Natural Gas Nominations

REQUEST

24. Were any natural gas nominations to Naturgy and/or NFE voluntarily reduced, capped, or withheld at Genera's own initiative during June, July, or August 2026 (e.g., due to Annual Contract Quantity or take-or-pay limitations, minimum-bill provisions, storage or regasification send-out capacity constraints, budgetary considerations, or any other internal reason)?

- a. If so, identify each instance, the volume involved, the reason for the reduction, who made the decision, and any analysis performed of the expected impact on the need to burn ULSD and/or HFO as a result.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-25

SUBJECT

Natural Gas Delivery

REQUEST

25. Please identify and explain any LNG cargo or vessel scheduling issues, delivery delays, or send-out/regasification capacity limitations affecting Naturgy's and/or NFE's ability to deliver the natural gas nominated by Genera during June, July, and August 2026, and quantify the resulting fuel cost impact, including the incremental cost of any ULSD and/or HFO burned as a substitute.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-26

SUBJECT

Natural Gas Delivery

REQUEST

26. Please provide copies of the natural gas supply agreements, and any amendments thereto, in effect between Genera and Naturgy and between Genera and NFE, including all provisions governing nomination procedures and deadlines, swing or ratable volumes, take-or-pay or minimum-take obligations, and curtailment or force majeure rights.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-27

SUBJECT

Natural Gas Nominations

REQUEST

27. Please describe and document the methodology, load forecasts, and heat-rate/unit dispatch assumptions used by Genera to calculate its natural gas nominations to Naturgy and NFE for June, July, and August 2026, and state whether and how those nominations were revised intra-month in response to changes in actual load, unit availability, or weather.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-28

SUBJECT

Natural Gas Nominations

REQUEST

28. Does Genera have any internal analysis or lessons-learned review of its natural gas nomination practices for June, July, and August 2026? If so, please provide it. If not, please explain why no such review was carried out given the increase in the Fuel Cost Adjustment for the quarter.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-29

SUBJECT

ULSD and HFO

REQUEST

29. For June 2026, July 2026 and August 2026, please provide by generating unit and by month, the quantity (in barrels or gallons) and cost of ULSD and HFO actually burned, compared to the quantity and cost that had been budgeted or forecasted months, and explain any material variance.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-30

SUBJECT

ULSD and HFO Dispatch

REQUEST

30. For each occasion during June, July, and August 2026 in which a generating unit capable of burning natural gas was instead dispatched on ULSD or HFO, please identify the unit, date, hours, and quantity of liquid fuel burned, and state whether natural gas was (i) unavailable, (ii) available but not nominated in sufficient quantity, or (iii) available and nominated but not called upon, explaining the reason in each case.

RESPONSE

LUMA is unable to confirm definitively whether a generating unit capable of operating on natural gas was dispatched on Ultra-Low Sulfur Diesel (ULSD) or Heavy Fuel Oil (HFO) solely due to natural gas unavailability during the reporting period. Unit dispatch decisions are determined by multiple operational factors, including but not limited to fuel availability, unit heat rates, real-time system demand, transmission constraints, unit ramp rates, minimum run times, and system reliability requirements. While economic dispatch principles prioritize units with the lowest variable production costs, operational considerations such as system stability, voltage support, and contingency reserve requirements may also influence commitment and dispatch decisions.

With respect to the specific reasons for fuel selection at any given generating unit, the applicable power producer or independent power producer (IPP) is the appropriate party to provide documentation regarding fuel nomination quantities, natural gas supply availability, contractual delivery obligations, and any fuel-related operational limitations. Fuel procurement, nomination scheduling, and supply contract administration fall within the scope of generator owner or administrator responsibilities and are not functions administered by LUMA under its Transmission and Distribution System Operation role.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-31

SUBJECT

ULSD and HFO Dispatch

REQUEST

31. Please provide Genera's variable-cost/dispatch-cost comparison (cost per MMBtu or per MWh) among natural gas, ULSD, and HFO for each month of June, July, and August 2026, and explain how those cost differentials were used in deciding whether to increase natural gas nominations rather than burn ULSD or HFO.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. This question was answered by Genera on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-32

SUBJECT

ULSD and HFO Dispatch

REQUEST

32. Please quantify the total incremental fuel cost incurred in June, July, and August 2026 as a result of burning ULSD and/or HFO in lieu of natural gas, and identify what portion of that incremental cost is attributable to (i) natural gas nomination levels set by Genera, (ii) delivery shortfalls or curtailments by Naturgy or NFE, (iii) forced/unplanned outages, and (iv) any other cause, providing all supporting workpapers and calculations.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2026 Genera requested an extension of time until September 24, 2026 to answer.

Permanent Rate

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-33

SUBJECT

ULSD and HFO Dispatch

REQUEST

33. Did Genera consider procuring additional or spot-market LNG cargoes or increasing its nominations to Naturgy and/or NFE, to reduce its reliance on ULSD and HFO during June, July, and August 2026? If so, describe the analysis performed and the outcome. If not, explain why not.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-34

SUBJECT

ULSD and HFO Dispatch

REQUEST

34. Please provide all internal communications, memoranda, meeting minutes, or reports discussing (i) the natural gas nomination levels submitted to Naturgy and/or NFE, or (ii) the decision to increase reliance on ULSD and/or HFO, for June, July, and August 2026.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2024 Genera requested an extension of time until September 24, 2026 to answer this request.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-35

SUBJECT

ULSD and HFO Dispatch

REQUEST

35. Please compare the volumes and cost of ULSD and HFO burned during June, July, and August 2026 to the volumes and cost of ULSD and HFO burned during the same months (June through August) of 2025 and explain the reasons for any material increase.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel consumption reports.

Regarding the increase, please see refer to figures 7-1 and 7-2 and responses to item 30.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-36

SUBJECT

FCA, PPCA, and FOS Proposed Factors

REQUEST

36. Does LUMA's proposed FCA for October through December 2026 reflect any adjustment, disallowance, or prudence review of the fuel costs associated with the increased use of ULSD and HFO during June, July, and August 2026 that are attributable to natural gas nomination levels? If not, explain why not.

RESPONSE

LUMA's proposed Fuel Charge Adjustment (FCA) factors for the period of October through December 2026 are based exclusively on the established process and the dispatch forecast. All data received from Genera is incorporated exactly as submitted, without modification or reclassification of cost components.

LUMA performs a thorough review and validation of the information provided. If any inconsistencies, anomalies, or data issues are identified, LUMA formally notifies Genera through the established regulatory communication protocols to ensure accuracy, completeness, and compliance. Nonetheless, Genera, not LUMA, determines if the data is corrected. The operational and cost data provided by Genera constitute the authoritative inputs for both the fuel reconciliation and the applicable procedures.

The FCA reconciliation process is strictly designed to compare actual fuel costs against actual revenues billed through the fuel adjustment mechanism. Consistent with this framework, the reconciliation reflects the fuel costs as reported by Genera and the corresponding billed revenues as recorded in the billing system. LUMA does not apply adjustments, disallowances, or prudence reviews to the fuel costs submitted; nor does LUMA allocate or differentiate cost variances attributable to specific fuel types, such as ULSD, HFO, natural gas nomination levels, or changes in generation volume or mix.

Under the governing regulatory structure, any prudence review or determination regarding the reasonableness of cost drivers affecting the FCA, including fluctuations in fuel type prices or operational dispatch decisions, falls within the jurisdiction of the Energy Bureau. Accordingly, LUMA's submission does not include such evaluations, as they are reserved for the Energy Bureau's independent review and adjudication.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-37

SUBJECT

Fuel Charge Adjustment

REQUEST

37. Please provide a full reconciliation, or "bridge," of the proposed \$0.06666 increase in the FCA, showing the separate dollar and per-kWh contribution of each of the following, to the extent applicable: (i) natural gas nomination or delivery shortfalls, (ii) increased volume/mix of ULSD and/or HFO burned in lieu of natural gas, (iii) increases in the per-unit market price of ULSD, (iv) increases in the per-unit market price of HFO, (v) forced/unplanned outages, and (vi) any other factor. Provide all supporting work papers and calculations.

RESPONSE

It should be noted that one of the factors contributing to higher observed fuel consumption than the forecast was the increased use of fuel barrels. See figures 7-1 and 7-2. Actual consumption exceeded forecast by approximately 845,000 barrels, resulting in a corresponding increase in fuel cost within the reconciliation. This variance is directly associated with a 7.3% increase in demand relative to expectations, driven primarily by elevated Cooling Degree Days (CDD). Cooling Degree Days are a weather-based metric used to estimate the demand for energy required to cool buildings. CDD quantify how much and for how long outside air temperatures exceed a specific baseline temperature, typically 65°F in the United States and then Puerto Rico. CDD during the period (June to August 2026) increased by 404 Fahrenheit degrees when compared to the prior quarter (March–May 2026) and were also 144 Fahrenheit degrees higher than the same period (June–August) of the previous year. This sustained increase in cooling requirements impacted system demand and, consequently, fuel consumption.

During the June–August 2026 period, total fuel costs experienced a significant increase when compared to the June 2026 approved forecast, resulting in a 24.5% variance, or approximately \$124.3M above the forecast. This deviation was driven primarily by substantial cost increases in Residual (Bunker 6) and Distillate, partially offset by lower-than-expected Natural Gas costs.

Residual – Bunker 6

Residual fuel costs totaled \$235.5 million, exceeding the June forecast by \$32.5 million (16.0%).

Monthly performance shows steady increases throughout all three months, with the largest impact occurring in August (+\$19.8 million). This category contributed 0.82 ¢/kWh, representing 12% of the total variance.

Permanent Rate

When comparing June's forecast with the updated September 15, 2026, forecast, the variance further widens. Residual costs increased by \$73.4 million (+42.2%), confirming a structurally higher fuel price environment.

Distillate

Distillate was the most significant contributor to the cost increase. Actuals reached \$166.2 million, more than doubling the forecast and resulting in a \$92.8 million increase (+126.6%).

July and August 2026 showed sharp spikes, with August rising 381% above forecast.

This fuel type contributed 2.35 ¢/kWh, or 35% of the total variance.

Despite this, the September 15, 2026, forecast revised Distillate downward, making the actual \$52.4 million below the new forecast. The large swing reflects volatility in market prices and procurement timing.

Natural Gas

Natural Gas costs remained relatively stable, ending slightly below forecast with a \$0.95 million favorable variance (-0.4%).

However, when compared to the updated September 15, 2026, forecast, actual Natural Gas costs exceed expectations by \$55.6 million (+34.9%), largely driven by increases in June and July 2026.

This category contributed (0.02) ¢/kWh, effectively 0% of the total variance in the 6.66 ¢/kWh contributor analysis.

Total Costs

Total fuel costs reached \$631.9 million, exceeding the June forecast by \$124.3 million (+24.5%).

Monthly performance highlights sustained pressure, particularly in July and August 2026 where cost overruns exceeded 28% and 39%, respectively.

Under the September 15, 2026, forecast comparison, total costs increased \$76.6 million (+15.5%), reflecting ongoing upward trends in Residual and Natural Gas.

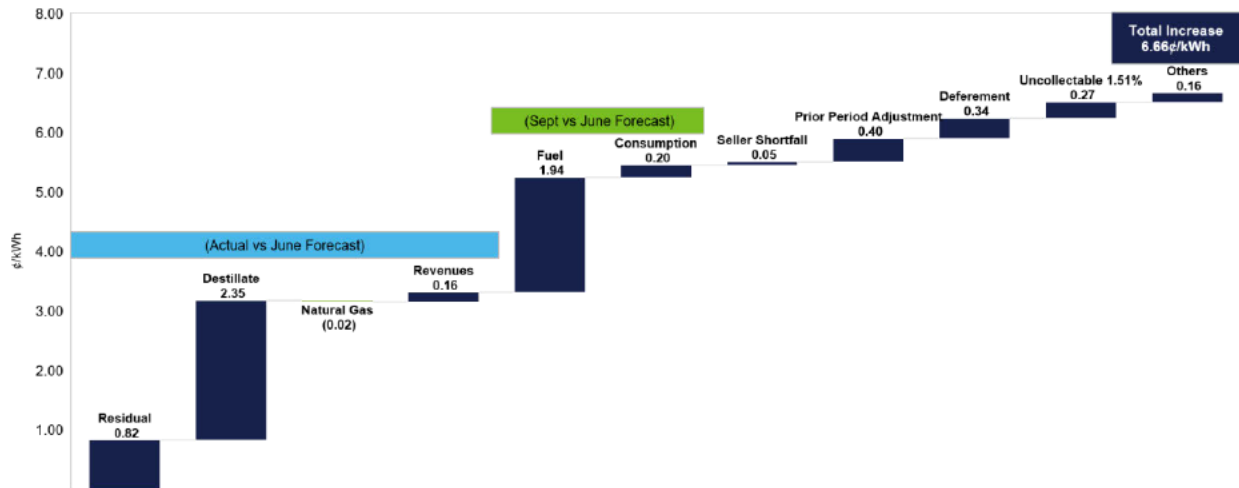
Revenues

Revenues decreased slightly, falling \$6.3 million below forecast (-1.3%), contributing an additional 0.16¢/kWh (2%) to total variance.

Permanent Rate

Following figure shows the waterfall contributor of the 6.66 ¢ increase.

Figure 37-1. Waterfall Breakdown of the 6.66¢ Increase



Supporting data is included in the Excel file: *RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-37*

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-38

SUBJECT

ULSD and HFO Dispatch

REQUEST

38. Please provide the average monthly price paid by Genera for ULSD and for HFO, respectively, during June 2026, July 2026, and August 2026, compared to (i) the price budgeted or forecasted for those months, and (ii) the average price paid for ULSD and HFO during June, July, and August 2025, and explain any material variance.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2026 Genera requested an extension of time until September 24, 2026 to answer this question.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-39

SUBJECT

Price Index or Benchmark

REQUEST

39. Please identify the pricing index or benchmark(s) (e.g., Platts, Bloomberg, New York Harbor ULSD, U.S. Gulf Coast No. 6 Fuel Oil, or similar) used to price Genera's ULSD and HFO purchases during June 2026, July 2026, and August 2026, and provide the underlying index values applicable to each purchase, together with any documentation supporting the magnitude and timing of the ULSD price increases.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2026 Genera requested an extension of time until September 24, 2026 to answer this question.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-40

SUBJECT

Priced Index or Benchmark

REQUEST

40. Does Genera hedge, lock in, or otherwise manage its exposure to fluctuations price of ULSD and/or HFO (e.g., through forward purchases, financial hedges, or fixed-price supply agreements)? If so, describe those mechanisms and state whether and how they were used during June 2026, July 2026, and August 2026, and quantify any savings or losses resulting from their use. If not, explain why not, and whether Genera has evaluated doing so considering recent price volatility.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. Genera answered this question on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-41

SUBJECT

Priced Index or Benchmark

REQUEST

41. Please state whether, and to what index or benchmark (e.g., Henry Hub, JKM, or another index), the price of natural gas purchased from Naturgy and from NFE is tied, provide the applicable index values for June 2026, July 2026, and August 2026, and provide a monthly comparison, on a \$/MMBtu basis, of the price of natural gas versus the price of ULSD and of HFO for each month.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. On September 22, 2026 Genera requested an extension of time until September 24, 2026 to answer this question.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-42

SUBJECT

ULSD and HFO Dispatch

REQUEST

42. To what extent did the increase in ULSD and/or HFO prices during June 2026, July 2026, and August 2026 itself influence Genera's decisions about the level of natural gas nominated from Naturgy and/or NFE for those months (e.g., a decision to increase or decrease gas nominations because of the relative cost of the liquid-fuel alternative)? Please explain and provide any related analysis.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts. This question was answered by Genera on September 22, 2026.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-43

SUBJECT

FCA Proposed Factor

REQUEST

43. Does LUMA's proposed FCA for October through December 2026 reflect any adjustment, disallowance, or prudence review specifically addressing the increase in fuel costs during June 2026, July 2026, and August 2026 attributable to increases price of ULSD and/or HFO, as opposed to the portion attributable to natural gas nomination levels or volume/mix changes? If not, explain why not.

RESPONSE

For this response, please refer to question A-36.

Permanent Rate

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-202609-PREB-Attachment A-44

SUBJECT

HydroCo

REQUEST

44. Impact of hydro generation curtailment and 2026 summer drought.

- a. During June, July and August 2026 was the availability of hydro generation curtailed due to drought or other conditions on the island that rendered anticipated hydro generation not being available in the quantities that were forecasted?
- b. Identify the MWHs of generation from hydro had estimated for each month, June, July and August 2026.
- c. Identify the actual hydro generation (in MWH) for each month June, July and August 2026.
- d. Identify the difference in MWH between (1) forecasted/projected and (2) actual in each month, June, July and August 2026.
- e. Provide LUMA's best estimates of the cost of replacement power used for generation in each month, June, July and August 2026, due to the lack of availability of hydro generation during those months. Include supporting calculations in Excel with formulas intact.

RESPONSE

- a. No, LUMA did not received any communication from PREPA indicating that hydro generation was unavailable during June, July, or August 2026 due to drought or any other conditions.
- b. Please refer to Table 44-1 below for the actual hydro during June, July, and August 2026, compared with the forecasted for those months.
- c. Please refer to Table 44-1 below for the actual hydro during June, July, and August 2026, compared with the forecasted for those months.
- d. Please refer to Table 44-1 below for the actual hydro during June, July, and August 2026, compared with the forecasted for those months.

Permanent Rate

Table 44-4. June-August 2026 Hydro Production (Actual and Forecast)

Hydro Gross Production (MWh)				
Month	Forecast	Actual	Abs variance	% Variance
Jun-26	2,795.6	1,896.0	(899.55)	-32.18%
Jul-26	2,112.6	1,930.0	(182.64)	-8.65%
Aug-26	3,184.2	1,384.0	(1,800.22)	-56.54%
Total	8,092.4	5,210.0	(2,882.41)	-35.62%

- e. Below in Table 44-2 is the estimate of the replacement cost for the forecast to actual variance in generation from Hydro for June 2026, July 2026, and August 2026. The table uses the average \$/MWh of PREPA facilities to serve as a conservative estimate and the fleet average \$/MWh from Diesel generation observed to serve as a high estimate during each month, using generation and expenditure data received monthly from Genera PR.

Table 44-2. June-August 2026 Hydro Production Variance Replacement Cost Estimate

	Abs Generation Variance (MWh)	PREPA Fleet Average Cost (\$/MWh)	System Average Diesel Cost (\$/MWh)	PREPA Fleet Replacement Cost (\$)	Diesel Replacement Cost (\$)
June 2026	899.55	\$148.65	\$325.34	\$133,716.15	\$292,658.55
July 2026	182.64	\$154.31	\$335.92	\$31,774.13	\$61,353.11
August 2026	1,800.22	\$154.28	\$359.40	\$312,903.69	\$646,997.32

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-45

SUBJECT

Aguirre and EcoEléctrica Outages

REQUEST

45. Aguirre and EcoEléctrica outages on July 29, 2026 and extending into other days, were the Aguirre Unit 2 plant, and the EcoEléctrica plant not available to generate due to unplanned outages? b. Identify the specific days and hours during the June, July and August 2026 period when the Aguirre Unit 2 plant, and the EcoEléctrica plant were not available to generate due to unplanned outages. c. Provide LUMA's best estimates of the cost of replacement power used for generation in each month, June, July and August 2026, due to the lack of availability of the Aguirre and EcoEléctrica generating resources associated with unplanned outages. Include supporting calculations in Excel with formulas intact.

RESPONSE

- a. Yes.
- b. Please refer to Table 45-1 below for the specific days and hours during the June, July and August 2026 period when the Aguirre Unit 2 plant, and the EcoEléctrica plant were not available to generate due to unplanned outages.

Table 45-1. Unplanned Outages for Aguirre 2 & EcoEléctrica from June 2026/July 2026/August 2026

Units	Date	Start Time	End Time	Duration	Cause (as reported by Genera, PR or IPP)
EcoEléctrica CT 1	22-jul	22/7/26 11:23 AM	23/7/26 2:41 AM	15 hours & 18 min	Failed in the AVR.
EcoEléctrica CT 1	28-jul	28/7/26 8:22 PM	28/7/26 11:33 PM	3 hours & 11 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip.
EcoEléctrica CT 2	28-jul	28/7/26 8:22 PM	29/7/26 8:01 AM	11 hours & 39 min	Initiated by the wet compression system loss and a chain effect that ended with a differential exhaust temperature trip.
Aguirre 2	28-jul	28/7/26 8:02 PM	29/7/26 1:36 AM	5 hours & 34 min	High amperage in vacuum pump 2-2 and low vacuum in condenser and then decided to forcedly shut

Permanent Rate

					down the unit to avoid a failure in motor of vacuum pump 2-2.
Aguirre 2	31-jul	31/7/26 6:27 PM	1/8/26 1:19 AM	6 hours & 52 min	Problems with control valve.
EcoEléctrica	15-ago	15/8/26 5:08 PM	16/8/26 2:29 AM	9 hours & 21 min	Trip of Line-51100 Costa Sur SP - EcoEléctrica caused by a neutral feeder conductor came into contact with the line due to wing gust.

c. LUMA does not prepare reporting on the economic impact of specific forced outage events. LUMA does prepare a monthly report titled *Fuel & Purchased Power Drivers Report* that analyzes the variance in generation plant performance from the Fuel Charge Adjustment (FCA) forecasted values and their impact on Fuel and Purchased Power expenditures on a monthly basis. However, this analysis does not isolate the economic impact of specific forced outage events and instead analyzes the economic impact of total monthly variance from the FCA forecasted values which is caused by all types of operational and performance characteristics that stray from forecasted assumptions. This is performed to cover all operational differences from forecasts that affect the reconciliation process and contribute to the determination of the FCA and Purchased Power Charge Adjustment (PPCA) riders during the reconciliation process.

Permanent Rate

PERMANENT RATE
NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-46

SUBJECT

AES

REQUEST

46. AES coal-fueled generating plant outages.

- a. During mid-August 2026 and extending into other dates, was the AES-owned owned generating plant available to generate due to unplanned outages?
- b. What is LUMA's understanding of the cause of the unplanned outages at the AES owned generating units that occurred during the June, July and August 2026 period?
- c. Identify the specific days and hours during the June, July and August 2026 period when the AES owned coal-fueled generating plant was not available to generate due to unplanned outages.
- d. Provide LUMA's best estimates of the cost of replacement power used for generation in each month, June, July and August 2026, due to the lack of availability of the AES generating associated with unplanned outages. Include supporting calculations in Excel with formulas intact.

RESPONSE

- a. Yes.
- b. Please refer to Table 46-1 below for the causes of the unplanned outages at AES plant during June, July, and August 2026.
- c. Please refer to Table 46-1 below for the specific days and hours during the June, July and August 2026 period when the AES plant was not available to generate due to unplanned outages.

Table 46-1. Unplanned Outages for AES from June, July, August 2026

Units	Date	Start Time	End Time	Duration	Cause <u>(as reported by Genera PR or IPP)</u>
AES 1	9-Jun	9/6/26 5:11 AM	11/6/26 11:27 PM	2 days & 18 hours & 16 min	Rupture in the FBHE.
AES 2	10-Jun	10/6/26 11:31 AM	10/6/26 2:31 AM	3 hours	Work on an inverter and they lost all the auxiliary equipment.

Permanent Rate

AES 2	13-Jun	13/6/26 8:22 AM	13/6/26 8:52 AM	30 Min	Problem with a BFWP.
AES 2	9-Jul	9/7/26 9:53 AM	9/7/26 10:52 AM	59 min	Loss of BFP 2B due to a false indication of high temperature in one of its bearings and unit did not maintain its operational parameters with the BFP 2A.
AES 2	11-Aug	11/8/26 3:56 PM	16/8/26 5:11 PM	5 days & 1 hours & 15 min	Boiler Rupture.
AES 1	16-Aug	16/8/26 7:47 PM	16/8/26 9:37 PM	1 hours & 50 min	Operational problem with vacuum system.
AES 2	16-Aug	16/8/26 7:47 PM	17/8/26 3:32 AM	7 hours & 45 min	Operational problem with vacuum system.

- d. LUMA does not prepare reporting on the economic impact of specific forced outage events. LUMA does prepare a monthly report titled Fuel & Purchased Power Drivers Report that analyzes the variance in generation plant performance from the Fuel Charge Adjustment (FCA) forecasted values and their impact on Fuel and Purchased Power expenditures on a monthly basis. However, this analysis does not isolate the economic impact of specific forced outage events and instead analyzes the economic impact of total monthly variance from the FCA forecasted values which is caused by all types of operational and performance characteristics that stray from forecasted assumptions. This is performed to cover all operational differences from forecasts that affect the reconciliation process and contributes to the determination of the FCA and Purchased Power Charge Adjustment (PPCA) riders during the reconciliation process. rrrrrr

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260921-Attachment A-2.1

SUBJECT

Attachment 3 of Proposed Factors

REQUEST

2.1 Refer to the Excel file [Oct_Dec_2026_Proposed_Factors.xlsx], tab: "Attachment 3 PPCA" which has the following table showing projected BESS MWH:

	BESS
Date	GWHR
Oct-26	0
Nov-26	0
Dec-26	0
Total	0

Also, refer to the similar Excel file that LUMA filed with its proposed quarterly factors for 7/1/2026 implementation, which had the following tables on the "Attachment 3 PPCA" tab for BESS and Hydro:

	BESS
Date	GWHR
Jul-26	20
Aug-26	19
Sep-26	20
Oct-26	19
Nov-26	20
Dec-26	21
Jan-27	23
Feb-27	17
Mar-27	24
Apr-27	26
May-27	25
Jun-27	23
Total	257

	Hydro
Date	GWHR
Jul-26	2.1
Aug-26	3.2
Sep-26	4.0
Oct-26	3.3
Nov-26	3.3
Dec-26	2.2
Jan-27	2.6
Feb-27	1.5
Mar-27	1.6
Apr-27	1.1
May, 11-27	2.7
Jun-27	2.8
Total	30

Concerning the above tables, please respond to the following:

- What was the basis for the projection of the Battery Energy Storage System (BESS) MWH (or GWHR) forecast information in each filing?
- Which entity (Genera, PREPA, or LUMA) made the BESS forecasts stated on "Attachment 3 PPCA"?
- Why is there no BESS MWH or GWHR amounts, other than zeros, in the current projection for October through December 2026?
- Does PREPA or Genera have a BESS in service? If so, please identify each such BESS, when it was placed into service, and its storage and generation capabilities. If not, explain why not.
- Does PREPA or Genera expect to have any BESS in service during the period October through December 2026? If so, please identify each such BESS, when it expected to be placed into service, and its storage and generation capacity. If not, explain why not.
- For the months of July and August 2026, and September 2026 to date, what was the actual hydro generation (in MWH) in each month?
- Which entity (Genera, PREPA, or LUMA) made the Hydro generation forecasts stated on "Attachment 3 PPCA"?
- Are LUMA, Genera and/or PREPA projecting that there will be any hydro generation in October, November and December 2026? If so, how much hydro generation is expected in each month? If not, explain why not.

Column
Actual Storage
In Storage Price/BEL
J-28 Report Inventory
Price/BBLs

Data Reference
Please go to Inventory 4/30/2022 PDF files received from external auditors. This represents audited gross amount of fuel barrels
File: Precio Ponderado directorado de Generación@ agosto 31, 2023, worksheet Summary, Column G
Quarter Reconciliation file, worksheet FUELREP-REPORTE-AUG2023
Quarter Reconciliation file, worksheet FUELREP-REPORTE-AUG2023

Are these accurate references for the February 28, 2026, fuel oil inventory reconciliation? If not, please provide accurate references.

- i. Should the "Data Reference" information be updated each time the fuel oil inventory is reconciled to the actual physical inventory quantities? If not, please explain.

RESPONSE

- a. For the proposed quarterly factors for FY2026 Q1, the basis for the projection of the Battery Energy Storage System (BESS) GWHR forecast was the 7th amendment of the Energy Storage Services Agreement (ESSA) between Clean Flexible Energy (CFE) Jobos and Puerto Rico Electric Power Authority (PREPA), where established a "Guaranteed Commercial Operation Date" by May 29, 2026. Also, according to the 8th amendment between CFE Salinas and PREPA, the same "Guaranteed Commercial Operation Date" of May 29, 2026, has been established.

For the Sept 15, 2026 filing, since no updates on Commercial Operation Dates (CODs) were received since the previous quarter, and still no new Utility-Scale projects connected and synchronized to the electrical grid, the basis for the projection of the Battery Energy Storage System (BESS) GWHR forecast was based on the most recent communications between CFE and LUMA, where the resource provider continues in initial testing phase, without a precise time of completion. As for past experiences, testing phases typically take several months to be successfully completed and then execute the official COD. As of Sept 15, 2026 filing assumptions, neither CFE Jobos nor CFE Salinas reached pre-operation, leading to the assumption that, at least for the period from October to December 2026, neither of CFE projects are expected to reach COD.

- b. LUMA prepared the BESS forecasts stated in "Attachment 3 – PPCA".
- c. For this response, please refer to response (a) above.
- d. This question is addressed to Genera PR.
- e. This question is addressed to Genera PR.
- f. For this response, please refer to table below with Hydro actual generation in MWh from July to September 22, 2026

	Hydro
Date	MWh
Jul-26	1,896

Aug-26	1,930
Sep-26	1,141
Total	4,967

- g. LUMA prepared the Hydro generation forecasts stated in “Attachment 3 – PPCA”.
- h. For this response, please refer to table below. This table is located in “Attachment 3 FCA” of *Oct-Dec 2026_Proposed_Factors* submitted on September 15, 2026, as it has been in previous filings.

	Hydro
Date	GWHR
Oct-26	3.3
Nov-26	3.3
Dec-26	2.2
Total	8.8

- i. This question is addressed to Genera PR.

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.2

SUBJECT

San Juan Combined Cycle 5 & 6

REQUEST

- 2.2 Please confirm, as discussed during the March 25, 2026, Technical Conference:
- a. That San Juan Combined Cycle 5 & 6 generating units can burn either Diesel or Natural Gas to generate electricity
 - b. That the cost per MMBtu and per MWH of natural gas was projected to be significantly lower than the cost of diesel for the June through August 2026 period, and
 - c. That Genera has nominated and expected to nominate and receive sufficient quantities of natural gas deliveries to San Juan CC units 5 and 6 to facilitate economic dispatch of those units during the June through August 2026 period.
 - d. If the above cannot be confirmed, explain fully.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

PERMANENT RATE NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.3

SUBJECT

Costa Sur

REQUEST

- 2.3 Please confirm, as discussed during the March 25 Technical Conference:
- a. That the Costa Sur generating plant can burn either Residual Oil or Natural Gas or a mixture of both fuels to generate electricity.
 - b. That the cost per MMBtu and per MWH of natural gas was projected to be significantly lower than the cost of residual fuel oil for the June through August 2026 period, and
 - c. That Genera has nominated and expected to nominate and receive sufficient quantities of natural gas deliveries to Costa Sur to facilitate Is Genera expecting problems or delays in fuel deliveries during the October 2026 through December 2026 period?
 - d. If the above cannot be confirmed, explain fully.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.4

SUBJECT

Natural Gas Nominations

REQUEST

2.4 Regarding the confirmations requested above:

- a. For actual results during June, July and August 2026, state whether natural gas nominations and deliveries to San Juan CC units 5 and 6 and to Costa Sur were sufficient to support economic dispatch, and whether natural gas costs remained lower than diesel and residual fuel oil costs, respectively. If actual results differed from the confirmations during the March 25, 2026, Technical Conference, identify each affected month, quantify the delivery shortfall and fuel-cost impact, and explain the operational, commercial, or reliability cause of the difference.
- b. For each deviation identified above, state whether the deviation continued into or recurred during the June through August 2026 reconciliation period that underlies the proposed FCA, PPCA, and FOS factors for October through December 2026. For any continuation or recurrence, identify the affected month, generating unit or plant, fuel, quantity, and cost impact, and explain how the deviation was reflected in the proposed factors.
- c. Please provide the monthly Fuel Purchase Reports from April 2026 through August 2026

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.5

SUBJECT

Natural Gas and Diesel

REQUEST

- 2.5 Concerning natural gas availability and diesel use at San Juan CC units 5 and 6 during the June through August 2026 reconciliation period underlying the proposed FCA, PPCA, and FOS factors for October through December 2026:
- a. For June, July, and August 2026, provide a month-by-month reconciliation for San Juan CC units 5 and 6 showing: the quantities of natural gas nominated by Genera to New Fortress Energy; the quantities scheduled, delivered, and received; any difference between nominated and received quantities; and the reason for each difference.
 - b. That the cost per MMBtu and per MWH of natural gas was significantly lower than the cost of diesel for June, July, and August 2026, and provide the monthly cost comparison.
 - c. For each month of June, July, and August 2026, state the quantity of ULSD burned at San Juan CC units 5 and 6 and attribute that usage by cause, including insufficient natural gas nominations, natural gas nominated but not delivered by NFE, unit outages, system reliability needs, fuel-quality constraints, dispatch instructions, or any other reason. For each cause, provide the supporting operational or commercial record relied upon
 - d. If the above cannot be confirmed, identify the specific statement that cannot be confirmed, explain why it cannot be confirmed, and provide the data, assumptions, documents, or operational records that support the response.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.6

SUBJECT

Natural Gas and Residual Oil

REQUEST

- 2.6 Concerning natural gas availability and residual fuel oil use at Costa Sur during the June through August 2026 reconciliation period underlying the proposed FCA, PPCA, and FOS factors for October through December 2026:
- a. For June, July, and August 2026, provide a month-by-month reconciliation for Costa Sur showing: the quantities of natural gas nominated by Genera to Naturgy; the quantities scheduled, delivered, and received; any difference between nominated and received quantities; and the reason for each difference.
 - b. That the cost per MMBtu and per MWH of natural gas was significantly lower than the cost of residual fuel oil (HFO) for June, July, and August 2026, and provide the monthly cost comparison.
 - c. For each of June July and August 2026, state the quantity of HFO burned at Costa Sur and attributed that usage by cause, including insufficient natural gas nominations, natural gas nominated but no delivered by Naturgy, unit outages, system reliability needs, fuel-quality constraints, dispatch instructions, or any other reason. For each cause, provide the supporting operational or commercial record relied upon.
 - d. If the above cannot be confirmed, identify the specific statement that cannot be confirmed, explain why it cannot be confirmed, and provide the data, assumptions, documents, or operational records that support the response.

RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.

PERMANENT RATE

NEPR-MI-2020-0001

Response: RFI-LUMA-MI-2020-0001-20260918-PREB-Attachment A-2.7

SUBJECT

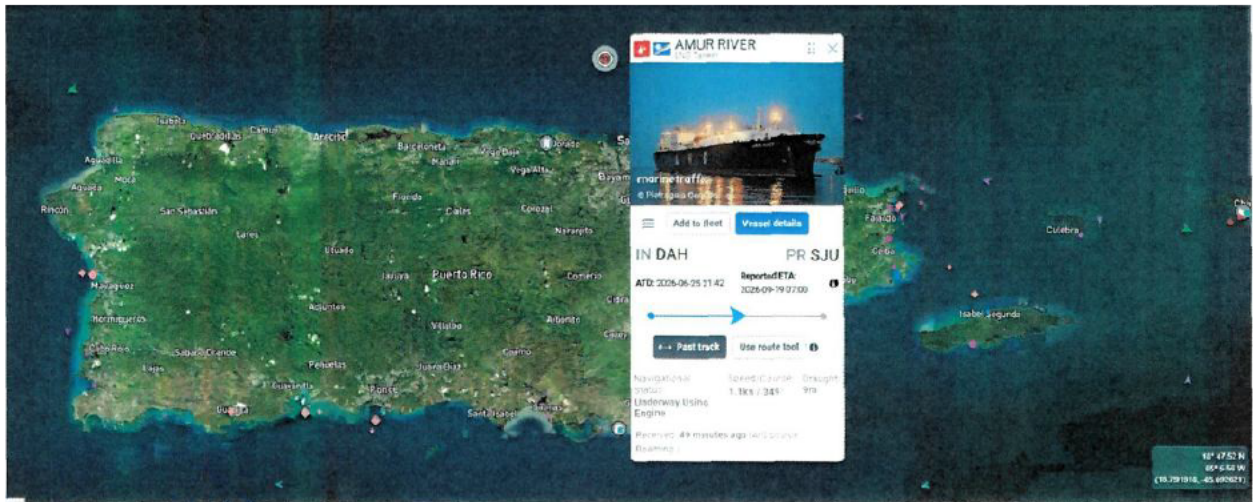
Fuel Cost Drivers

REQUEST

- 2.7 Concerning fuel-cost drivers reflected in the proposed October through December 2026 FCA, PPCA, and FOS factors, distinguish increases caused by changes in commodity prices from increases caused by reduced natural gas availability, operational fuel switching, or changes in fuel mix:
- a. State whether the proposed FCA increase of \$0.06666 for October through December 2026 is attributable to changes in the market price of ULSD and/or HFO during June, July, and August 2026, as distinct from changes in the volume or mix of ULSD and/or HFO burned in lieu of natural gas. If the increase reflects both price and volume effects, quantify each effect separately by month and by fuel.
 - b. Provide a reconciliation, separately for June, July, and August 2026, showing the dollar impact on fuel cost attributable to: (i) changes in the unit price of ULSD; (ii) changes in the unit price of HFO; (iii) changes in the volume of ULSD burned; (iv) changes in the volume of HFO burned; and (v) changes in the fuel mix caused by burning ULSD and/or HFO instead of natural gas.
 - c. State whether the physical fuel oil inventory reconciliations for June 30, 2026, July 31, 2026, and August 31, 2026, corroborate the reported increases in ULSD and/or HFO consumption for those months. Provide each reconciliation and identify any variance between book inventory, physical inventory, reported consumption, and fuel cost recovery.
 - d. If the reconciliations requested in the immediately preceding item have not yet been prepared for June, July, and August 2026, state when they will be available and provide them upon completion.
 - e. Concerning the El Nuevo Día reports dated September 18 and September 19, 2026 regarding the dispute between New Fortress Energy and the San Juan Bay harbor pilots over the entry of an LNG vessel, including vessel Amur River (IMO 9317999), the alleged vessel-size or navigational restrictions, and the reported absence of natural gas availability for San Juan generation units at least until Monday, address whether this event created, or is expected to create, incremental diesel use, fuel-cost recovery, or reimbursement exposure:

- i. Identify each LNG vessel that was scheduled, proposed, delayed, denied entry, held offshore, substituted, or otherwise affected by the San Juan Bay dispute, including the Amur River (IMO 9317999), and for each vessel provide the scheduled arrival date, actual arrival or expected arrival date, cargo quantity, unloading window, and the reason for any delay or restriction.
- ii. For each day from September 18, 2026, through the date natural gas service was restored, state whether San Juan CC unit 6, San Juan CC unit 5, and any temporary generation units at San Juan could operate on natural gas, actually received natural gas, or were required to operate on diesel only. Provide the daily natural gas quantities scheduled, delivered, received, unavailable, curtailed, or replaced by diesel. If the response to part e is "yes," please identify and analyze the causes of each of those forced/unplanned outages.
- iii. Quantify the incremental diesel or ULSD burn caused by the LNG vessel delay, harbor-pilot dispute, vessel -size dispute, court restriction, Coast Guard instruction, NFE supply limitation, or any related cause. For each affected unit and day, provide the incremental MMBtu, gallons, MWh generated, avoided natural gas quantity, diesel cost, estimated natural gas cost, and net fuel -cost impact.
- iv. State whether any incremental diesel or ULSD cost associated with the September 2026 LNG supply interruption, the Amur River vessel issue, or the San Juan Bay dispute is expected to be included in any upcoming FCA, PPCA, or FOS reconciliation. If so, identify the reconciliation period, proposed recovery mechanism, estimated dollar amount, estimated cents-per-kWh or bill impact, and whether Genera or LUMA proposes to recover those costs from customers before resolving any reimbursement claim against NFE or any other responsible party.
- v. Provide the latest estimate of all backup fuel reimbursement amounts associated with natural gas unavailability, LNG vessel delays, NFE supply issues, harbor access restrictions, or other events that required diesel or other backup fuel to be burned instead of natural gas at San Juan, Palo Seco, or any other affected generating facility. Identify the period covered, the generating units involved, the backup fuel quantities, the claimed reimbursement amount, the amount Genera can confirm as undisputed or accepted, the amount disputed or pending, and the entity expected to pay or credit the reimbursement.
- vi. Explain the current status of the backup fuel reimbursement process, including the contractual basis for reimbursement, the date each claim was submitted, the procedural step pending, the latest estimated figure Genera can confirm, any supporting invoice or calculation already provided to NFE or another counterparty, the expected date for final resolution, and whether the resolution is expected to result in payment, offset, credit, settlement, denial, or regulatory recovery from customers.
- vii. Provide all notices, emails, operational logs, fuel switching instructions, dispatch records, invoices, reimbursement claims, cost calculations, court filings, Coast Guard communications, harbor-pilot communications, and NFE communications supporting

the response. If Genera or LUMA can confirm no requested fact, estimate, or document, identify the specific item that cannot be confirmed, explain why it cannot be confirmed, state when the information is expected to become available, and provide the best available estimate with the assumptions used.



RESPONSE

This question is addressed to Genera. LUMA does not manage fuel supply contracts.