

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

NEPR

Received:

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IN RE:

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY'S 10-
YEAR INFRASTRUCTURE PLAN-
DECEMBER 2020

CASE NO. NEPR-MI-2021-0002

**SUBJECT: Informative Motion on the Status of
SOW: 4 x 25 MW BESS Interconnections at
LUMA 38kV System (August 2026)**

**INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS
INTERCONNECTIONS AT LUMA 38KV SYSTEM (AUGUST 2026)**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), through the undersigned legal counsel and respectfully submit the following:

I. Relevant Procedural Background

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority (“PREPA”) submit to the Energy Bureau the specific projects to be funded with Federal Emergency Management Agency (“FEMA”) funds or any other federal funds at least thirty (30) calendar days prior to submitting these projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”), FEMA or any other federal agency (“March 26th Order”). It also directed PREPA to continue reporting to the Energy Bureau and FEMA within the next five years, the progress of all ongoing efforts related to the approval of the submitted projects not yet approved by the Energy Bureau.¹ This Energy Bureau thereafter

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

determined that this directive applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law* (“August 25th Motion”). Therein, LUMA submitted the scope of work (“SOW”) for the “4 x 25 MW BESS Interconnections at LUMA 38kV System” transmission and distribution project (“4 x 25 MW BESS T&D Project”), for the Energy Bureau’s review and approval before submitting it to COR3 and FEMA.

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order (“August 30th Order”) in which it approved the 4 x 25 MW BESS Project SOW, determining that this project was necessary to improve the system’s reliability.

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order (“January 3rd Order”) in which it ordered LUMA “to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the [4 x 25 MW BESS Project].” *See* January 3rd Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System* to comply with the January 3rd Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the 4 x 25 MW BESS Project until its June 2025 completion date (“January 14th Order”). *See* January 14th Order, p. 2. The Energy Bureau directed that the status report include:

- i) The locations of the twenty (20) sites studied;
- ii) The final four selected sites;
- iii) The cost to complete the studies of the twenty sites.
- iv) Indicate the funds utilized to pay for these studies and the amount spent to date.

- v) The reimbursement status of these funds, or if they were advanced by FEMA
- vi) The [Detailed SOW (“DSOW”)] presented to FEMA and COR3;
- vii) The ROI and LUMA responses to such ROI requested by FEMA and COR3;
- viii) The FAASSt number for the project; and
- ix) An updated cost estimate based on the DSOW.

See Id.

7. In compliance with the January 14th Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this Motion.

RESPECTFULLY SUBMITTED.

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

In Guaynabo, Puerto Rico, on the 27th day of August 2026.



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Exhibit 1

*4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report
(August 2026)*

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report

August 27, 2026



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1.0 Introduction

In accordance with the Resolution and Order (R&O) dated January 14, 2025, issued by the Puerto Rico Energy Bureau (Energy Bureau) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at the LUMA 38 kV project. This report focuses on the key activities and progress achieved by LUMA in the past 30 days for the Battery Energy Storage Systems (BESS, or collectively as the “Project”) approved by the Energy Bureau in its Resolution dated August 30, 2023 (“August 30 Resolution”).

The BESS projects remained inactive from August 2025 until July 15, 2026, when they were reactivated in the FEMA Grants Portal through the coordinated efforts of LUMA, the Puerto Rico Electric Power Authority (PREPA), the Federal Emergency Management Agency (FEMA), and other relevant stakeholders. With the projects now reactivated, project activities may resume. LUMA is providing an updated project schedule and anticipated milestones in Section 2.4 of this report.

As project work resumes, LUMA conducts periodic reviews of the Consolidated Project List to ensure all projects remain aligned with the System Remediation Plan and other relevant initiatives, particularly given limited funding availability. This ongoing evaluation prevents anchoring to initial assumptions, supports optimal fund utilization, and identifies redundancies, including overlaps with non-federal initiatives. Through this process, LUMA ensures that only the highest-value projects advance and that the portfolio continues to support grid modernization and system needs.

2.0 Monthly Status Update

2.1 Detailed Scope of Work

LUMA continues advancing the Battery Energy Storage System (BESS) initiative in close coordination with the Energy Bureau, the Central Office for Recovery, Reconstruction and Resilience (COR3), PREPA, and FEMA. Our efforts remain focused on finalizing the required materials and preparing for the next steps in the FEMA Section 406 Hazard Mitigation (HM) review process. To guide the next phases of review and submission, LUMA has established the following critical steps:

1. Finalization of Narrative Documentation for COR3 and FEMA

Status: **In Progress**

On July 15, 2026, FEMA reactivated the projects and provided the FAASt numbers (see Section 3.5). LUMA's Grants Management team continue working with the formulation to justify the project as 406 with continue meetings with BESS SME's.

2. Integration of Stakeholder Feedback and Final Internal Review

Status: **Pending**

Upon COR3's review, LUMA will integrate any additional recommendations or requested refinements. LUMA will address these updates before submitting the finalized BESS HM justification package to FEMA.

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3. Submission of FEMA Section 406 Justification

Status: **Pending**

After completing all internal and stakeholder reviews, LUMA will submit the finalized BESS HM justification to FEMA. This package will include all required supporting documentation to align with Section 406 guidance and support efficient review.

2.2 Procurement

Following the reactivation of the BESS projects, LUMA is evaluating next steps and confirming alignment on the project scope and any related changes associated with reactivation.

2.3 Design Status

The Preliminary Design has been completed. The selected vendor will manage the Detailed Design through a competitive procurement process. Design assumptions have been updated to reflect the latest guidance from PREPA, COR3, and FEMA, ensuring the selected vendor can develop a compliant, technically robust Detailed Design.

2.4 Project Schedule

Following the reactivation of the BESS projects, LUMA includes the following updated schedule reflecting revised milestones and dependencies. Please note that this timeline is contingent to LUMA's Grants Management team confirming alignment with PREPA and the HM narrative.

- Resubmit DSOW to FEMA: December 2026
- FEMA DSOW Review: December 2027
- Procurement Start: January 2028 (After Obligation Approval)
- Construction Start: June 2029
- Commissioning: December 2030

3.0 Project Status

3.1 Project Reactivation

FEMA reactivated the BESS projects on July 15, 2026.

3.2 Selected Sites

Currently there is no Non-Federally Funded Capital allocation available for land acquisition. Accordingly, LUMA will seek reimbursement for future land acquisition costs through FEMA, with expenditure occurring as the projects are obligated.

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Table 1. Land Acquisition Milestones and Estimated Timeline

Milestone	Estimated Duration	Projected Completion
FEMA Tier 1 Inclusion & Grants Portal Activation	Several weeks	Completed (July 15, 2026)
Phase 1 ESA Initiation	2 Months	+2 Months from Activation
Land Appraisal & Due Diligence	1-2 Months	+3-4 Months
Negotiation & Legal Review	6-7 Months	+10-11 Months
Closing & Title Transfer	1 Month	+12 Months

3.3 Reimbursement Status

The table below shows reimbursements received before the project's status changed.

Table 2. Reimbursement Received

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	\$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$47,355.27

3.4 Requests for Information

LUMA presented the document, including the Section 406 HM justification, to PREPA and COR3 for review by November 2025, before submitting it to FEMA. The response to FEMA's request for information (RFI) is expected to be submitted in 2026 after the alignment mentioned in Section 2.1 of this document is completed.

3.5 FAASt Number

As indicated in Section 3.2 above, LUMA has identified four areas where it intends to site the projects. On July 15, 2026, the four BESS projects received new FEMA FAASt numbers as part of the reactivation process:

Table 3. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	1070280
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	1070284
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	1070282

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Project Title	FEMA FAASSt #
FAASSt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	1070283

3.6 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta, Manatí, Aguadilla, and San Juan Detailed Scopes of Work (DSOWs) submitted to FEMA.

Table 4. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate (\$)
FAASSt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	\$55,941,767
FAASSt [4 x 25 MW BESS Interconnections Manatí] (Substation)	\$57,640,005
FAASSt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	\$52,720,520
FAASSt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	\$55,503,065