

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

NEPR

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IN RE:

ANNUAL PERFORMANCE TEST
PROCEDURE – THERMAL
GENERATION EQUIPMENT

CASE NO.: NEPR-MI-2023-0003

SUBJECT: Motion to Submit Responses to the
August 19, 2026 Requirements of Information
and Request for Confidential Treatment

**MOTION TO SUBMIT RESPONSES TO THE AUGUST 19, 2026 REQUIREMENTS OF
INFORMATION AND REQUEST FOR CONFIDENTIAL TREATMENT**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On June 16, 2023, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order establishing the instant docket for the filing, review, and evaluation of thermal generation performance testing procedures.

2. On May 23, 2024, the Energy Bureau issued a Resolution and Order (“May 23, 2024 Order”) conditionally approving Genera’s Annual Performance Test Procedure (“APT”), subject to Genera filing a revised version incorporating the modification requirements set forth in Attachment A thereto.

3. On July 10, 2024, Genera filed a *Motion to Submit Final Revised Annual Performance Test Procedure* (“July 10 Motion”), through which it submitted its Final Revised Annual

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority (“P3 Authority”) and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before PREB concerning any matter related to the performance of any of the O&M Services (as defined in the LGA OMA) provided by Genera under the LGA OMA.

Performance Test Procedure as Exhibit A thereto (the “2024 Procedure”). Thereafter, on July 19, 2024, Genera filed a *Memorandum of Law in Support of Confidential Treatment of the Final Revised Annual Performance Test Submitted on July 10, 2024* (“July 19 Motion”), requesting confidential treatment of the 2024 Procedure.

4. On March 13, 2026, Genera filed a *Motion to Establish Genera’s Equivalent Availability Factor Targets for FY25 and FY26, Including Capacity and Heat Rate, and Submit the Annual Performance Test Results* (“March 13 Motion”), through which Genera submitted its Equivalent Availability Factor (“EAF”) targets for FY25 and FY26, together with its APT results and supporting Exhibits A and B.

5. On July 22, 2026, Genera filed a *Motion to Submit Revised Annual Performance Test Procedure* (“July 22 Motion”), through which it submitted, as Confidential Exhibit A, a revised Annual Performance Test Procedure with a revision date of June 9, 2026 (the “Revised Procedure”). Thereafter, on July 31, 2026, Genera filed a *Memorandum of Law in Support of Confidential Treatment of the Revised Annual Performance Test Procedure Submitted on July 22, 2026* (“July 31 Motion”), requesting confidential treatment of the Revised Procedure.

6. On August 19, 2026, the Energy Bureau issued a Resolution and Order (“August 19 Order”) in which, after reviewing the Revised Procedure, it determined that additional information was required to evaluate the proposed revisions to the APT. Accordingly, the Energy Bureau ordered Genera to respond, within fifteen (15) days of notification of the August 19 Order, to the Requirements of Information (“ROIs”) included in Attachment A thereto.

7. In compliance with the August 19 Order, Genera hereby submits its responses to the ROIs included in Attachment A thereto. Genera’s responses are included herein as **Exhibit 1**.

8. Genera also submits, as **Exhibit 2**, a corrected and updated version of the Exhibit A spreadsheet submitted with the March 13 Motion. The revised spreadsheet incorporates corrections and previously omitted test information and replaces only the earlier spreadsheet, not the test reports previously submitted.

9. Genera further submits, as **Exhibit 3**, final APT reports not included with the March 13 Motion. These reports supplement the previously submitted reports and support the accompanying ROI responses.

10. Genera respectfully requests confidential treatment of the APT reports submitted as Exhibit 3 pursuant to Section 6.15 of Act 57-2014, as amended, and the Energy Bureau's Policy on Management of Confidential Information. Genera further requests that Exhibit 3 be maintained under seal pending the Energy Bureau's determination of this request. Genera will submit a supporting memorandum of law identifying the information for which protection is sought and the specific grounds supporting confidential treatment, in accordance with the applicable policy.

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the foregoing; accept Exhibits 1 through 3 in response to the August 19 Order; permit substitution of the revised Exhibit A spreadsheet submitted as Exhibit 2 for the spreadsheet filed with the March 13 Motion; grant confidential treatment to the APT reports submitted as Exhibit 3 and maintain them under seal pending determination of that request; and grant any other relief the Energy Bureau deems just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of September 2026.

[Signature page follows]

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CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System.

In San Juan, Puerto Rico, this 3rd day of September 2026.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

/s/ Ernesto Raúl Ramos Maldonado
Ernesto Raúl Ramos Maldonado

Exhibit 1

Responses to Request for Information, Attachment A of the August 19, 2026
Resolution and Order

Genera's Responses to the August 19th Requirement of Information

Annual Performance Test Procedure

Introduction

Genera's Annual Performance Test ("APT") program arises from the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("OMA"), dated January 24, 2023. The OMA establishes annual testing to determine the "Tested Capacity and Heat Rate for each Legacy Generation Asset" the generating capability of the equipment and its efficiency in converting fuel into electricity.

Development of the testing procedure began during Genera's transition into operations, with the proposed procedure submitted to the Energy Bureau on June 20, 2023. Following the Bureau's conditional approval on May 23, 2024, Genera submitted revisions addressing its directives, culminating in the procedure filed on July 10, 2024. Experience gained during subsequent testing informed the further revisions submitted on July 22, 2026, for the Bureau's review and approval. The present responses address that continuing development of the testing program and the supporting performance information.

Genera submits the following responses and supporting materials to explain the testing performed, the basis for the proposed changes, and the relationship between test results and the applicable performance calculations.

ROI 1 | Substantive changes and FY25 operational experience

PREB REQUIREMENT

For each substantive change between the 2024 Procedure and the Revised Procedure, identify the section, describe the change, and describe the specific operational experience from the FY25 test campaign that motivated it, including the unit and test where that experience occurred where applicable.

Reference: 2024 Procedure and Revised Procedure.

RESPONSE

Genera provides below the substantive changes between the 2024 Procedure and the Revised Procedure. The FY25 lessons supporting these changes were identified through the testing campaign by technology (Steam Units, Gas/Combustion Turbines and Combined Cycles) rather than from a single unit or test. Accordingly, the applicable technology is identified below. Where a change was fleet wide or administrative, no individual unit or test is applicable.

Table 1: Procedures Comparison

Applicable technology and sections	2024 Procedure	Revised Procedure	Substantive change and FY25 operational basis
Fleet-wide — §§1.0, 7.4, 8.4 and 9.4	Required testing each authorized fuel for units capable of operating on more than one fuel.	Requires testing the primary or available fuel. Steam units are tested on the primary fuel only.	FY25 experience showed that testing an additional fuel did not materially improve the APT results, while changing fuels increased the risk of a unit trip and could affect availability during peak operating conditions.
Fleet-wide — §§1.0 and 12.1	Did not expressly authorize postponing an APT based on system conditions.	Allows testing to be shifted later in the Contract/Fiscal Year based on operating reserves, generation needs and coordination with the T&D System Operator. Prior-period results remain	FY25 experience demonstrated that APTs may need to be performed outside the summer peak to avoid affecting the availability of critical generation.

Applicable technology and sections	2024 Procedure	Revised Procedure	Substantive change and FY25 operational basis
		in use until the next APT.	
Fleet-wide — §§2.0, 3.0 and 5.0	Required instruments to be calibrated, checked for accuracy and supported by calibration documentation.	Uses existing station instrumentation, available calibration information and maintenance review of questionable readings.	During FY25, the APTs relied on installed station instrumentation. Plant personnel verified functionality and apparent accuracy during testing, while formal calibration and corrective work remained part of the applicable plant maintenance process.
Fleet-wide — §5.0	Required the APT team to monitor and record emissions during testing.	Removes that requirement.	FY25 experience confirmed that emissions are monitored and reported through the separate environmental-compliance process and are not used to determine APT capacity or heat rate.
Fleet-wide — §§3.0, 10.1 and 11.0	Defined Heat Rate using gross output, LHV and laboratory-tested heating value.	Uses Net Heat Rate and permits a fuel sample or available plant data. Section 10.1 continues to require reporting on an LHV basis.	FY25 testing showed that gross-output information was not consistently available as the APT reporting basis. Net output is used for the APT calculation, and §10.1 retains LHV as the applicable reporting basis.
Fleet-wide — §3.0	Evaluated stability using operating limits and permissible deviations.	Adds comparison with available historical data and consideration of equipment changes	Experience with the legacy fleet demonstrated that equipment age, configuration and modifications must be considered when current

Applicable technology and sections	2024 Procedure	Revised Procedure	Substantive change and FY25 operational basis
		made since installation.	results are compared with prior performance.
Fleet-wide — §6.0	Used the term Performance Test Specialist and required submission of the testing entity's qualifications.	Uses the term Test Coordinator and removes the annual qualification-filing requirement.	This was not a unit-specific operational change. TGPS remains the contracted testing entity. Its qualifications were evaluated through RFP No. 4124, and its prior performance was reviewed through Genera's procurement process.
Fleet-wide — §§6.0, 13.1 and 13.4	Required the Independent Engineer to witness testing and fuel sampling, conduct an independent review and prepare the final report.	The Test Coordinator prepares the final report. The Independent Engineer provides oversight and independent review when requested by P3A in writing before testing.	The revised allocation follows the testing workflow: the Test Coordinator conducts the test, develops the results and prepares the report, while independent review remains available when requested by P3A.
Fleet-wide — §6.0	Required submission of the Plant Report within twenty working days after receipt of the test information and fuel analysis.	Removes the fixed twenty-working-day period.	FY25 experience showed that sufficient time is needed to collect and reconcile plant data, fuel information and test results before completing the report.
Fleet-wide — §§6.0, 7.2, 8.2, 9.2 and 10.1	Required fuel samples at the beginning and end of the test and corresponding laboratory analyses.	Requires one fuel sample and permits use of recent facility fuel data when a sample is unavailable.	Comparisons from prior APTs showed no significant variation between the beginning and end fuel samples. The Revised Procedure therefore eliminates duplicative

Applicable technology and sections	2024 Procedure	Revised Procedure	Substantive change and FY25 operational basis
			sampling while retaining representative fuel information.
Steam Units — §7.1	Required significant steam or combustion-air leaks to be corrected before testing or the test to be rescheduled.	Removes the mandatory correction and rescheduling provision.	Repairs of this nature ordinarily require an environmental or major-outage window. Requiring such repairs before every annual APT could prevent completion of the test within the fiscal year.
Steam Units and Combined Cycles — §§7.2 and 9.2	Included condenser make-up water in the required isolation checks.	Removes condenser make-up water from the specified isolation lists.	Experience with these technologies showed that separately listing condenser make-up water did not change the APT calculation when the applicable test boundary and the flows affecting heat input were properly isolated.
Steam Units — §7.2	Required distribution of the P&IDs, Station Flow Diagram and detailed test plans ten business days before testing.	Uses a pre-test meeting, available P&IDs and the Station Flow Diagram displayed in the control room.	Current P&IDs are not consistently available for the legacy steam technology. The revised process allows plant personnel and the Test Coordinator to confirm the test boundary and required isolation using the information available at the facility.
Steam Units — §§4.0 and 7.4	Required multiple fixed load points, including MECL, and two runs at each load	Only full load is required. Two runs during the first and second years are	FY25 experience showed that maintaining legacy steam units at multiple fixed loads during peak

Applicable technology and sections	2024 Procedure	Revised Procedure	Substantive change and FY25 operational basis
	point during the first and second years.	recommended rather than mandatory.	conditions was operationally difficult and could constrain availability. Full-load performance provides the principal APT measurement.
Gas/Combustion Turbines – §§4.0 and 8.4	Required testing at three different load points.	The 100%, 75% and 50% load cases may be considered, but only full load is required. A second run is performed at the same load.	FY25 experience showed that testing at multiple load points during peak conditions affected scheduling and availability. Full-load testing provides the principal performance information, while the repeat run confirms repeatability.
Combined Cycles – §§4.0 and 9.4	Required testing at three different load points, including MECL.	The 100%, 75% and 50% load cases may be considered, but only full load is required. A second run is performed at the same load.	FY25 experience showed that maximum-load performance is the principal APT measurement for combined-cycle technology. Additional load changes during peak conditions complicated test execution and coordination with the T&D System Operator.

ROI 2 | Departures from May 2024 required modifications

PREB REQUIREMENT

Identify each provision of the 2024 Procedure included to comply with the May 2024 Order and that the Revised Procedure would modify or remove. For each, explain why Genera believes departure from the Bureau's required modification is now appropriate.

Reference: 2024 Procedure, Revised Procedure, and May 2024 Order, Attachment A, Items 1 through 9, pages 3 and 4.

Table 2: May 2024 Required Modifications

May 2024 directive	Revised treatment	Genera's response
Attachment A, Item 1 — File the qualifications of the Performance Test Specialist and Independent Engineer with the Performance Test Schedule.	The annual qualification-filing requirement was removed, and the role was renamed Test Coordinator.	TGPS remains Genera's contracted testing entity. Its qualifications were evaluated through RFP No. 4124, and its prior performance was reviewed through Genera's procurement process. Removing the annual filing requirement avoids resubmitting the same procurement records. It does not eliminate the requirement that the Test Coordinator be qualified or prevent the Energy Bureau from requesting those records.
Attachment A, Item 2 — Require the Independent Engineer to be separate from the Performance Test Specialist.	The separation requirement remains whenever an Independent Engineer is requested by P3A.	Genera is not proposing a departure from the independence requirement. If an Independent Engineer participates, that entity must remain separate from the Test Coordinator.
Attachment A, Item 3 — Identify the parties participating in each part of the testing.	Retained and expanded through an organizational chart and responsibility matrix.	No departure is proposed. The Revised Procedure more clearly identifies the responsibilities of the Operator, Test Coordinator, T&D System Operator and Independent Engineer.

May 2024 directive	Revised treatment	Genera's response
Attachment A, Item 5 — Provide the Station Flow Diagram and detailed test plans to all parties ten business days before testing.	Replaces advance distribution with a pre-test meeting, review of available P&IDs and presentation of the Station Flow Diagram in the control room.	Current P&IDs are not consistently available for the legacy steam technology. The revised process allows the test boundary and required isolation to be confirmed directly with plant personnel and the Test Coordinator using the information available at the facility.
Attachment A, Item 6 — Require two steam-unit test runs at each load point during the first and second years.	Two runs are recommended rather than mandatory, and only full load is required.	FY25 experience showed that maintaining legacy steam units at multiple fixed loads and repeating each load point during peak conditions was operationally difficult and could constrain availability. The Revised Procedure retains a fixed-load test and recommends a second run to confirm repeatability.
Attachment A, Item 7 — Require the Independent Engineer to witness the test and fuel-sample collection.	Independent Engineer witnessing applies when requested by P3A in writing before testing.	The Test Coordinator remains responsible for conducting the APT in accordance with the procedure, and the T&D System Operator may participate as an observer. Independent witnessing remains available whenever P3A determines that it is required.
Attachment A, Item 8 — Make the Independent Engineer responsible for preparing the Final Performance Test Report.	Responsibility for preparing the report was assigned to the Test Coordinator. The Independent Engineer reviews the report when requested by P3A.	The Test Coordinator conducts the testing and develops the technical results and is therefore assigned responsibility for preparing the report. Independent review remains separate and available when requested by P3A.
Attachment A, Item 9 — Submit the Independent Engineer's final report, calculations, witnessing	Genera will provide the Final Performance Test Report and, when applicable, the Independent Engineer's summary review and	The detailed calculations remain part of the Final Performance Test Report prepared by the Test Coordinator. When P3A requests

May 2024 directive	Revised treatment	Genera's response
information and System Operator feedback.	witnessing information, together with System Operator feedback.	an Independent Engineer, Genera will also provide the Independent Engineer's review and witnessing information. This treatment aligns the required submission with the revised allocation of responsibilities.

ROI 3 | Independent Engineer participation

PREB REQUIREMENT

Regarding the Independent Engineer: (a) Explain the basis for making the Independent Engineer's participation contingent on a prior written request by the P3A. (b) State whether the P3A was consulted on this change before the July 22 filing and provide all related communications. (c) State whether the P3A has indicated it would issue such requests as a standing matter. (d) State the incremental annual cost of Independent Engineer participation in the FY25 campaign.

Reference: *Revised Procedure, pages 15, 40 and 43.*

RESPONSE

(a) Genera proposed making Independent Engineer participation contingent on a prior written request from P3A because P3A, as Administrator under the OMA, is responsible for overseeing Genera's contractual compliance and may determine when additional independent oversight is warranted. This represents an additional cost that must be assumed by PREPA (not Genera) and approved by administrator of the OMA. Under the proposed arrangement, the Test Coordinator would remain responsible for conducting and documenting the tests, while an Independent Engineer would participate when requested by P3A. This approach is intended to avoid duplicative services and costs while preserving P3A's ability to require independent oversight.

(b) The OMA does not require Genera to consult with P3A regarding changes to the APT procedure.

(c) Accordingly, no related communication exists.

(d) The incremental annual cost associated with Independent Engineer participation in the FY25 campaign was approximately \$100,000.

ROI 4 | Test Coordinator identity and qualifications

PREB REQUIREMENT

Regarding the Test Coordinator, formerly referenced as the Performance Test Specialist in the 2024 Procedure, identify the person or firm Genera intends to appoint, describe their qualifications and relevant testing experience, and explain the basis for removing the requirement to file the testing entity's qualifications.

Reference: *Revised Procedure, page 11 and 2024 Procedure, page 13.*

RESPONSE

Genera has designated and will continue to use Thermogen Power Services Inc. ("TGPS") as the Test Coordinator. TGPS was originally selected through the competitive procurement process conducted under RFP No. 4124 and performed the contracted fleet performance-testing services during 2024. TGPS was subsequently selected for continued services based on its proposal, satisfactory past performance, acceptance of the applicable contractual terms, and pricing.

TGPS is a thermal-performance engineering firm founded in 2009 that reports having tested more than 40 GW of generating capacity. Its performance engineers collectively possess more than 60 years of experience conducting and supervising performance tests involving gas turbines, steam turbines, combined-cycle units, boilers, HRSGs, and cooling systems. Its relevant experience includes preparing testing procedures, supplying and operating precision instrumentation, conducting tests, calculating results, and preparing technical reports under applicable ASME, IEC, ISO, and other industry standards. TGPS has also conducted periodic heat-rate and performance-testing programs for generating fleets and regulatory entities in multiple jurisdictions.

The basis for removing the annual filing requirement is that the Test Coordinator's qualifications are evaluated through Genera's procurement and contracting processes, which include review of the firm's technical experience, capacity, proposal, pricing, and prior performance. In TGPS's case, those qualifications were evaluated during RFP No. 4124 and were subsequently confirmed through its satisfactory performance of the contracted services. Filing the same records annually would therefore duplicate an evaluation already performed. The removal of that requirement is not intended to eliminate the requirement that the Test Coordinator be qualified or to restrict the Energy Bureau's access to supporting information. Genera will maintain the applicable qualification and procurement records and make them available to the Energy Bureau upon request.

ROI 5 | Primary or available fuel

PREB REQUIREMENT

Define 'primary or available fuel' as used in the Revised Procedure. State who determines fuel availability for a given test and describe how the capacity and heat rate of dual fuel units on their secondary fuel would be established going forward.

Reference: *Revised Procedure, pages 3, 25 and 32.*

RESPONSE

For purposes of the Revised Procedure, "primary fuel" means the fuel ordinarily used for the unit's normal operation and dispatch. "Available fuel" means a fuel that is physically available at the facility in sufficient quantity and quality and that the unit can safely and reliably use at the time of testing.

The Plant Manager will determine fuel availability based on the facility's fuel inventory, supply conditions, unit configuration, and operating condition at the time of the test.

Section 5.22 of the OMA requires the APT to establish capacity and heat rate for each LGA but does not expressly require separate annual capacity and heat-rate values for every fuel the unit is capable of using. Genera therefore proposes that the APT values be established using the primary or available fuel actually consumed during the test. If separate secondary-fuel values are required, they would need to be established through a separate test conducted when that fuel is available and system and unit conditions permit.

ROI 6 | Deadline for summary results

PREB REQUIREMENT

Section 1.0 of the Revised Procedure describes submitting summary results 'by May 31st and/or within thirty (30) days of closure of the Contract / Fiscal Year.' State which deadline governs and describe the circumstances under which each would apply.

Reference: *Revised Procedure, page 4.*

RESPONSE

Genera proposes revising Section 1.0 to eliminate the ambiguity created by the phrase "May 31st and/or within thirty days."

May 31 would remain the standard deadline when the APT campaign can be completed according to the regular schedule. When testing or reporting is delayed because of unit availability, system dispatch requirements, operating-reserve conditions, outage scheduling, fuel-analysis turnaround, or the time required to validate the test data, Genera proposes that the submission deadline may be extended, as necessary, up to 180 days following the close of the Contract or Fiscal Year.

Under this proposed clarification, the thirty-day period would no longer operate as an independent deadline.

ROI 7 | Test loads and partial-load testing

PREB REQUIREMENT

Regarding test loads: (a) Reconcile the statement that the 100, 75, and 50 percent load cases 'will be considered' with the statement that only full load is required. (b) State whether a test at the minimum environmental compliance load remains required. (c) Provide Genera's analysis of the effect of discontinuing partial load testing on the accuracy of dispatch modeling, considering the FY25 results showing materially higher heat rates at partial load.

Reference: *Revised Procedure, page 9.*

RESPONSE

- (a) The statement that the 100%, 75%, and 50% load cases "will be considered" means that the additional load points may be tested when unit and system conditions permit. The only mandatory test point proposed by Genera is full load or the unit's maximum achievable load at the time of testing. This maximum load is the most important to know the units maximum capacity and availability.
- (b) A separate test at the minimum environmental compliance load would not remain mandatory because the APT is intended to establish capacity and heat rate rather than demonstrate environmental compliance.
- (c) During the FY25 campaign, the testing entity did not use the partial-load results as the governing basis for determining APT capacity and heat rate. Those determinations were based on the maximum achievable load test. Accordingly, Genera has not identified an adverse effect on the APT results from discontinuing mandatory partial-load testing. The higher heat rates observed at partial load reflect the units' reduced efficiency at lower operating levels but do not change the capacity and heat-rate results established at maximum achievable load.

ROI 8 | Repeat test runs

PREB REQUIREMENT

Explain the engineering basis for downgrading repeat test runs from required to recommended for steam units while retaining the repeat run step for combustion turbine and combined cycle units and describe the burden that repeat runs imposed during the FY25 campaign, by unit and by day.

Reference: *Revised Procedure, pages 20, 26 and 33, and May 2024 Order, Attachment A, Item 6, page 3.*

RESPONSE

Genera's engineering basis for making the second test run recommended, rather than mandatory, for steam units is the longer ramping and stabilization time associated with large steam-cycle equipment. A mandatory second run requires the unit to remain at a fixed load for an additional period, notwithstanding changing system-dispatch requirements.

Combustion-turbine and combined-cycle units can generally transition to and maintain the requested load more quickly. Accordingly, the Revised Procedure retains the repeat-run step for those technologies.

The proposed change does not eliminate repeat runs for steam units. A second run remains recommended and may be performed when unit and system conditions permit or when confirmation of the initial results is appropriate. The change removes the requirement to perform a second run automatically in every case.

The FY25 Final Test Reports document the following additional fixed-load testing time attributable to repeat runs for steam units:

Table 3: Repeat runs

Unit	Test date	Repeated load points	Additional fixed-load test time
Palo Seco Unit 3	October 1, 2024	110 MW and 150 MW	2 hours
Palo Seco Unit 3	October 2, 2024	190 MW	1 hour
Costa Sur Unit 5	June 17, 2025	250 MW and 350 MW	2 hours
Costa Sur Unit 5	June 23, 2025	250 MW and 350 MW	2 hours
Costa Sur Unit 6	June 17, 2025	250 MW	1 hour
Costa Sur Unit 6	June 23, 2025	250 MW	1 hour
San Juan Unit 9	June 19, 2025	70 MW, 85 MW and 100 MW	3 hours
Aguirre Unit 2	July 21, 2025	230 MW and 290 MW	2 hours
Aguirre Unit 2	July 21, 2025	230 MW and 290 MW	2 hours
Aguirre Unit 2	July 22, 2025	350 MW	1 hour and 20 minutes

ROI 9 | Fuel sampling

PREB REQUIREMENT

Regarding fuel sampling, explain the basis for reducing sampling to one sample, define 'recent fuel analysis' including a maximum age, explain the removal of the prohibition on sampling from storage or service tanks, and reconcile Section 10.1's reference to averaging sample characteristics with the collection of a single sample.

Reference: *Revised Procedure, pages 16, 23, 28 and 35.*

RESPONSE

During the FY25 campaign, Genera did not observe material variability in the heating value of the fuel supply that would warrant collecting multiple samples during the same APT. Genera therefore determined that one sample collected on the date of the test is sufficient to characterize the fuel being consumed during the test. Laboratory results for those samples are generally received within ninety 90 days after collection.

When only one sample is collected, no averaging of multiple sample characteristics occurs. Section 10.1 should therefore be revised to provide that the calculation will use the characteristics of the single test-day sample or, when that sample is unavailable, an approved recent fuel analysis.

For purposes of the Revised Procedure, a "recent fuel analysis" means an analysis based on a sample collected the APT is performed and the lab testing is performed approximately no more than sixty (60) days after the APT.

Because the Revised Procedure requires only one fuel sample, averaging multiple sample characteristics is not applicable. Section 10.1 will be revised to state that the heating value used in the calculation will be the value obtained from the single test-date sample or, when unavailable, from an approved fuel analysis that is no more than ninety days old as of the test date.

ROI 10 | Instrumentation calibration

PREB REQUIREMENT

Regarding instrumentation, provide the calibration status of the fuel flow metering and net electrical output metering for each Legacy Generation Asset, including the date and standard of last calibration, and describe Genera's plan and schedule to establish current calibration for these two instrument classes before the next APT cycle.

Reference: *Revised Procedure, page 10.*

RESPONSE

Genera maintains the fuel flow meters at the LGA through an active operational verification process. Plant personnel perform zero checks under no flow conditions, preventive maintenance inspections and, where physical tank measuring is performed, routine reconciliation of metered consumption against changes in fuel inventory. These controls provide recurring confirmation of meter performance under actual operating conditions and allow potential discrepancies to be promptly identified and addressed.

Regarding the net electrical output meters, these meters are maintained by and fall under LUMA's jurisdiction. Accordingly, Genera does not maintain the requested calibration records and is not in a position to independently confirm their calibration status, last-calibration dates, applicable standards, certificates, or schedule for pending calibration work. Genera requested this information from LUMA on August 26, 2026 and will provide any responsive information received. Given LUMA's responsibility for maintaining these meters and its direct access to the corresponding records, Genera respectfully submits that the requested information would be most appropriately obtained directly from LUMA. Genera remains available to facilitate that coordination and incorporate LUMA's response into the APT record.

ROI 11 | Heating-value basis

PREB REQUIREMENT

Reconcile the definition in Section 3.0 permitting heat rate on a lower and/or higher heating value basis with Section 10.1, which requires the lower heating value basis. State the single basis Genera proposes to use as primary, and whether Genera will report both bases for each test, consistent with FY25 practice.

Reference: *Revised Procedure, pages 6 and 35.*

RESPONSE

Genera proposes using the lower heating value as the primary basis for calculating and reporting heat rate. The higher heating value may be calculated or reported as supplemental information when the necessary data are available or when otherwise required, but Genera does not propose mandatory reporting on both bases for every test.

Section 3.0 will be revised to identify the lower heating value as the primary reporting basis and to align that definition with Section 10.1. This treatment is consistent with the primary basis applied in the FY25 reports.

ROI 12 | Emissions recording during testing

PREB REQUIREMENT

Explain the basis for removing the recording of emissions during testing and identify the monitoring and reporting that Genera contends captures equivalent information.

Reference: 2024 Procedure, page 10.

RESPONSE

The requirement for the APT team to separately record emissions during testing was removed because emissions data are not required to calculate the APT's principal outputs of net capacity and net heat rate. The separate recording also duplicated information already captured through the facilities' continuous emissions monitoring systems and applicable environmental, permit, and regulatory reports.

The removal does not eliminate or modify Genera's environmental monitoring or reporting obligations. Test-period emissions information remains available through the applicable continuous emissions monitoring and regulatory reporting systems.

ROI 13 | Industry code basis and deviation tables

PREB REQUIREMENT

Identify the industry code basis for each stability and permissible deviation table in the Revised Procedure, state whether the values conform to the current editions of ASME PTC 6, PTC 22, PTC 46, and PTC 19.1, and identify and justify any departures. State whether the alignment with ASME PTC 46 required by the May 2024 Order is retained in the Revised Procedure.

Reference: *Revised Procedure, pages 19, 24 and 31, and May 2024 Order, page 3.*

RESPONSE

The stability and permissible deviation criteria in the Revised APT Procedure were developed using ASME PTC 6-2004 (R2014) for steam units and ASME PTC 22-2023 for combustion-turbine parameters. ASME currently identifies these as the applicable editions.

For Table 1, the permissible standard deviations were derived from the permissible peak-to-valley fluctuations established in PTC 6, with adjustments to power output, condenser vacuum, and the additional monitored criteria to accommodate the operating characteristics of Genera's existing steam units during fixed-load testing.

For Tables 2 and 3, PTC 22 was used as the technical basis for the combustion-turbine parameters and permissible deviations, with adjustments to fuel-source pressure and rotating-shaft speed to accommodate the operating characteristics of the units and permit stable, repeatable testing under actual operating conditions.

Genera proposes to retain the values currently included in Tables 1, 2, and 3. The same engineering rationale applies to each identified departure since the values provide reasonable flexibility for the normal operating variability of Genera's existing units during fixed load performance testing, thereby avoiding the rejection or repetition of an otherwise technically valid test. This flexibility does not eliminate the requirement to demonstrate stable operating conditions or affect the calculation and reporting of the test results.

Accordingly, the tables are based on the applicable ASME standards but do not reproduce every ASME criterion or numerical limit exactly and should not be characterized as establishing full ASME Code-test conformity.

The alignment with ASME PTC 46 required by the May 2024 Order is retained. The applicable provisions of ASME PTC 46-2015 (R2025) are used as technical guidance for capacity/MW and heat-rate testing under the Revised APT Procedure. The entire Code is not incorporated because provisions directed to contractual acceptance testing, guarantee verification, and other determinations outside the scope of the annual testing required under the OMA are not applicable.

ASME PTC 19.1-2018 (R2024) provides the current methodology for quantifying test uncertainty. However, the OMA does not require a formal quantified uncertainty analysis under PTC 19.1, and the testing entity does not perform such an analysis for these annual tests. Therefore, Genera does not represent that the APT constitutes a fully conforming PTC 19.1 uncertainty analysis.

ROI 14 | Performance correction curves

PREB REQUIREMENT

Regarding correction curves, state for each Legacy Generation Asset whether performance correction curves exist and provide Genera's plan and schedule to develop them. Describe how year-over-year comparability of results will be maintained where curves do not exist, particularly if testing shifts seasonally under the Revised Procedure's scheduling provisions.

Reference: *Revised Procedure, pages 37 and 38.*

RESPONSE

Performance correction curves are not currently available for the LGAs. Genera currently anticipates developing unit specific correction curves when a unit undergoes a major repair that provides an appropriate technical opportunity to establish or update its performance baseline.

Until correction curves are developed, year over year comparisons will rely on consistent testing procedures, measurement accuracy requirements, and disclosure of the conditions existing when each test was conducted.

Genera is currently evaluating the possibility of developing a plan to gather the necessary information for the development of the correction curves on all the LGA.

ROI 15 | Test deferrals and prior-period results

PREB REQUIREMENT

Describe the criteria and process for deferring a test under Section 1.0, how deferrals will be documented in the December 1 schedule and monthly updates filed in this docket, and the maximum period during which prior period results will remain in use before a new test is required.

Reference: *Revised Procedure, pages 3, 4 and 38.*

RESPONSE

Genera-PR has a continuous dynamic schedule in coordination with the ICM (Engineering Construction and Maintenance) personnel to keep up with the necessary outages of the units. Genera plans with the APT contractor the availability to perform the APT tests on the unit. The criteria used by the Operations and Maintenance to coordinate this is based on:

1. Operating Reserve Requirements
2. The Generation needed comparing the past years and identifying and forecasting what generation could be needed in coordination with the LUMA TOC.
3. The information is discussed with the system operator to coordinate if there is any of the PPOA'S Generation units that would be out of service to certify that the required Generation Load does not affect an outage of one unit with another.
4. These processes are discussed in the AOP'S document signed between PREPA and LUMA and establish the basis of communications between the companies.

As for the coordination of the APT tests:

1. A schedule is created, considering the schedule of the units as described above.
2. Genera-PR coordinates with the contracted company the dates to perform the APT tests.
3. Genera-PR informs LUMA and the PREB that tests will be performed in accordance to what was established.
4. When the contracted company comes, tests are performed based on the actual Generation and situations on the system, always keeping in mind the goal of not affecting the Generation needed.
5. If a unit is not available or not generating due to:
 - a. Forced Outage
 - b. Environmental Maintenance
 - c. Major Maintenance

These units the tests will be performed in the next cycle of APT tests for the next fiscal year.

ROI 16 | FY24 and FY25 final test records

PREB REQUIREMENT

Provide the final test report for each Legacy Generation Asset tested in FY24 and FY25, together with the Independent Engineer's report for each test, the System Operator's witnessing feedback, the signed protocol letters, and the deviation forms.

Reference: 2024 Procedure, pages 44 and 47, and May 2024 Order, Attachment A, Item 9, page 4.

RESPONSE

Included with this response are the final test reports for the LGAs tested with their correspondent and requested supporting documents.

ROI 17 | LUMA meter access and certificates

PREB REQUIREMENT

Regarding the net electrical output metering under LUMA's jurisdiction, identify each unit where meter access or calibration certificates were not available during testing in both FY24 and FY25, describe the coordination undertaken with LUMA since, and state what is needed to secure access and certificates for future tests.

Reference: 2024 Procedure, pages 10 and 39.

RESPONSE

The net-electrical-output meters and their associated calibration records are under LUMA's jurisdiction. Accordingly, Genera formally requested from LUMA the meter identification, calibration status, last-calibration dates, applicable standards, certificates, and schedule for pending calibration work. The unit-specific calibration information necessary to address this request remains subject to LUMA's confirmation.

Genera respectfully requests that the Energy Bureau obtain this information directly from LUMA, together with confirmation of the arrangements needed to secure meter access and calibration certificates for future tests. Genera remains available to support the necessary coordination.

ROI 18 | Link between APT results, EAF targets, and incentives

PREB REQUIREMENT

Describe how the APT results for FY25 were used to derive the Equivalent Availability Factor values and targets submitted in this docket on March 13, 2026, including the calculation linking net capacity and net heat rate results to the EAF figures. Explain whether the EAF values underlying the incentive claims in the FY2025 Incentives Report were derived from the APT results and provide the EAF formula applied in that report with the formula applied in the March 2026 Submission, including the treatment of equivalent planned derated hours.

Reference: *March 2026 Submission, Exhibit A.*

RESPONSE

Genera performed the APT on all available units to obtain the capacity of the units and the heat rate. This allows Genera to understand what is the maximum capacity of the unit, which is the only factor needed from the APT results to calculate the EAF, and the heat rate, which is unrelated for the calculation of the EAF, but allows Genera to understand how efficiently the unit is operating at the exact moment the tests was performed.

The formulas used by Genera to calculate the Equivalent Availability Factor is the standard formula established by the North American Electric Reliability Corporation (NERC). As shown below, and from the formula established by NERC for EAF calculation, the heat rate is not required for the calculation of the EAF. Additionally, the equivalent unplanned and maintenance derated hours are also incorporated in the summary below.

NERC EAF FORMULAS

$$EAF = \frac{AH - EUDH - EMDH}{PH}$$

$$EUDH = \frac{DH \times Derate}{APT}$$

$$EMDH = \frac{DH \times Derate}{APT}$$

EAF – Equivalent availability factor.

AH – Availability hours.

PH – Period hours.

APT – Annual performance test result in MW.

DH – Derated hours.

Derate – The quantity of megawatts (MW) by which a unit is restricted from operating below the APT load level.

EUDH – Equivalent Unplanned Derated Hours.

EMDH – *Equivalent* Maintenance Derated Hours

The EAF formula, raw data and EAF calculations for FY25 and targets for FY26 were part of the March 13, 2026, submission.

ROI 19 | Out of Management Control classifications

PREB REQUIREMENT

Regarding hours classified as Out of Management Control (OMC) in the availability metrics submitted March 13, 2026: identify who classifies OMC events, the criteria and industry standard applied, who verifies the classifications, and provide the complete OMC event log for FY24 and FY25 by unit, with the cause and supporting documentation for each excluded period. For any unit where all or substantially all period hours were classified as OMC, explain the basis and the effect on that unit's reported Equivalent Availability Factor.

Reference: *March 2026 Submission, Exhibit B.*

RESPONSE

The *Generating Availability Data System Data Reporting Instructions*, specifically North American Electric Reliability Corporation (NERC) Appendix K, establishes the criteria to classify events that are Outside of Management Control (OMC). Appendix K shows designated events, restrictions, or outages that result in the curtailment or offline status of a generating unit due to circumstances entirely beyond the control of plant management and operating personnel. This classification prevents unjust penalization caused by external failures.

Based on these guidelines, Genera reviews all events where units are offline or limited to determine if unit unavailability is due to circumstances that are OMC events according to appendix K. Under Article 7.1(c)(iii) &(iv) of the OMA, the P3A is responsible for verifying Genera's classifications.

For FY24, Genera did not claim EAF incentives or used the OMC events for any calculation on the Incentives and Penalties Report. For FY25, Genera used the OMC events for the EAF incentives calculation. Attached to this response is the Report with the classification of the OMC events for FY25.

ROI 20 | Declines in demonstrated gross load

PREB REQUIREMENT

For any unit whose maximum demonstrated gross load declined between its FY25 performance test and the November 2025 retest reflected in the March 13, 2026 submission, describe the cause of the decline, the corrective maintenance planned or completed, and how the reduced capability is reflected in the derating and availability accounting.

Reference: *March 2026 Submission, Exhibit A.*

RESPONSE

The following units experienced notable derates compared to the previous year's test:

1. Palo Seco 3 exhibited a load derate of 45 MW. The primary cause was significant deterioration of the air heater baskets, resulting in increased pressure differential and unit limitations. During a scheduled environmental outage in January 2026, the air heater baskets were replaced, thus removing the limitation.
2. Cambalache 2 showed a derate of 24.6 MW. This value was inadvertently mistaken; the correct result from the November APT test was 78.07 MW. Genera is utilizing the 78.07 MW result for all related calculations. The correct number is shown in the final APT Report issued by ThermoGen.
3. San Juan 9 registered a derate of 19.7 MW. This unit had a due major inspection. Between the 2024 and 2025 tests, multiple limitations emerged due to required major repairs. Accordingly, the unit underwent scheduled major maintenance in July 2026.
4. San Juan 6 registered a derate of 4.4MW. The Unit had a scheduled Major Overhaul for December, which was performed after the APT. This Major Overhaul was performed by the OEM (Mitsubishi), under the Long Term Service Agreement.

The decrease in load observed across the remaining units over the one-year period is nominal and reflects normal and expected degradation of a generation unit. Additional factors influencing unit load during testing include environmental conditions and filter status at the time of evaluation.

ROI 21 | Assets not tested in FY24 or FY25

PREB REQUIREMENT

Identify each Legacy Generation Asset that was not performance tested during the FY24 and FY25 campaigns, the reason it was not tested, and the basis on which its capacity, heat rate, and availability values were computed in the March 13, 2026 submission.

Reference: March 2026 Submission, Exhibit A.

RESPONSE

Genera did not conduct an APT campaign during FY24. The initial campaign under the 2024 Procedure began in October 2024 and continued through July 2025. The following assets or configurations were not tested during that campaign:

Table 4: Units not tested in the FY25 campaign

Asset or configuration	Reason not tested
Palo Seco Unit 4	Out of service for generator repair.
Mayagüez Unit 3	Unit unavailable; combustion problems were reported for engine 3A.
Mayagüez Unit 4 – engine 4A	Engine 4A was offline; testing covered engine 4B only.
Daguao 1-2	Unavailable because of transmission problems.
Palo Seco TM4 / GT04	Unit was not operational at the time of testing.
San Juan TM1 / GT01, TM4 / GT04, and TM9 / GT09	Units were not operational at the time of testing.
Aguirre Combined Cycle Block 1 – GT1-3 and steam turbine V-1	These components were not operational at the time of testing.
Aguirre Combined Cycle Block 2 – GT2-3 and steam turbine V-2	These components were not operational at the time of testing.

For the assets identified above, the capacity references and availability calculations supporting the March 13, 2026 submission are documented in Exhibit B's "Metrics ACUM (OMC)" worksheet. Availability was calculated using the recorded FY25 available-hour and derating entries, with the capacity references used to weight the aggregate EAF results. Mayagüez Unit 4 was represented at unit level using a combined capacity reference of 50.3 MW, rather than separate engine entries. These capacity references should not be interpreted as measured results from an unperformed APT. No initial-campaign APT heat-rate result was reported for the untested assets or configurations; separately dated results in Exhibit A correspond to completed tests. Heat rate is not an input to Exhibit B's EAF calculations.

ROI 22 | Approval status of the 2024 Procedure

PREB REQUIREMENT

State Genera's position on the approval status of the 2024 Procedure, including the basis for treating it as approved, and confirm that Genera conducted the FY24 and FY25 campaigns under that version. Also explain the statement in Genera's FY2024 Incentives and Penalties Report, as recited at page 10 of the June 2025 Order, that the EAF should not be given the challenges with the approval of the Annual Performance Test.

Reference: *May 2024 Order, page 2 (conditional approval) and 2024 Procedure.*

RESPONSE

Genera clarifies that no Annual Performance Test campaign was conducted for FY24. The FY25 campaign was conducted under the 2024 Annual Performance Test Procedure, as filed with the Energy Bureau on July 10, 2024.

The Energy Bureau's May 23, 2024 Order conditionally approved the procedure subject to incorporation of the modifications specified in Attachment A. Genera subsequently submitted revised versions addressing those requirements and the additional comments received from the Bureau's advisors. In paragraph 5 of its March 13, 2026 submission, Genera stated that, following the July 10, 2024 filing and the absence of further communication from the Energy Bureau, it considered the Bureau to have agreed with the Final Revised APT Procedure pursuant to Section 4.2(v) of the OMA. Genera relies on that provision as the contractual basis for its position regarding the procedure used for the FY25 campaign.

The correct statement in the FY24 Incentives and Penalties Report is the following: "(Despite the improvement in available capacity, we believe the Equivalent Availability Factor should not be considered for the calculation of incentives or penalties given the challenges with regard to approval of the Annual Performance Test regime, as discussed with P3 separately.)" This statement is related to a contractual conversation between Genera and P3A regarding the Equivalent Availability Factor.

ROI 23 | Current piping and instrumentation diagrams

PREB REQUIREMENT

The Revised Procedure states that current piping and instrumentation diagrams are not available for these facilities. Describe the status of unit drawings for each facility and Genera's plan to restore current documentation.

Reference: *Revised Procedure, page 18, and May 2024 Order, Attachment A, Item 5, page 3.*

RESPONSE

Genera confirms that current, as-built piping and instrumentation diagrams (P&IDs) are not available for the LGA units, as disclosed at page 18 of the Revised Procedure. The unit documentation available for these facilities is incomplete, and Genera is currently engaged in compiling and consolidating the drawing records for each facility.

The absence of current P&IDs does not impair Genera's ability to conduct the Acceptance Performance Test. The APT is executed using the units' installed instrumentation; the parameters required to conduct and validate the test are read directly from the control room, and the test procedures are developed from that instrumentation.

ROI 24 | Technical contacts and conference availability

PREB REQUIREMENT

Identify Genera's designated technical contacts for this proceeding and confirm Genera's availability for a technical conference with the Energy Bureau's staff and consultants regarding the Revised Procedure.

RESPONSE

Genera has designated technical contacts for this proceeding and confirms its availability to participate in a technical conference with the Energy Bureau's staff and consultants regarding the Revised Procedure. Genera will make the personnel it has identified available at the date and time the Bureau finds convenient and respectfully requests reasonable advance notice of the date and of the matters to be addressed so that the appropriate technical personnel are present.

Exhibit 2

Revised Exhibit A to the March 13, 2026 Motion
Native Excel Workbook

Exhibit 3
Supplemental Final Annual Performance Test Reports
CONFIDENTIAL