

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

NEPR

Received:

Sep 9, 2026

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IN RE: ELECTRIC SYSTEM PRIORITY
STABILIZATION PLAN

Case No.: NEPR-MI-2024-0005

Subject: Motion in Compliance with
Resolution and Order of August 31, 2026

MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF AUGUST 31,
2026

TO THE ENERGY BUREAU:

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

1. On August 31, 2026, the Puerto Rico Energy Bureau (“PREB”) issued a Resolution and Order in the instant proceeding (“August 31 Resolution”) concerning the status, availability, operation, and maintenance of the temporary generation fleet associated with Priority Stabilization Plan (“PSP”) Activity No. 1.

2. In the *August 31 Resolution*, the PREB reiterated that PSP Activity No. 1 calls for the continued operation of the temporary generation units located at the San Juan and Palo Seco Power Plants through December 31, 2027, due to their importance to the stability and reliability of the electric system.

3. In relevant part, the PREB noted that PREPA acquired fourteen (14) TM2500 turbine-generator units in March 2024—ten (10) located at the San Juan Power Plant and four (4) located at the Palo Seco Power Plant—and thereafter entrusted the operation and maintenance of those units to Genera.

4. The *August 31 Resolution* discusses the current availability of the temporary generation fleet and raises questions concerning, among other matters, (i) the condition and maintenance of the units, (ii) the causes and duration of outages, (iii) the use of funds allocated for their operation and maintenance, (iv) the status of necessary repairs, (v) the adequacy of supporting electrical and fuel infrastructure, and (vi) the availability of contractual or warranty remedies.

5. Accordingly, as part of its continuing oversight of PSP Activity No. 1, the PREB commenced a status probe intended to obtain comprehensive information regarding the operation, maintenance, reliability, condition, failures, fuel capability, supporting electrical and fuel infrastructure, spare parts inventory, contractual arrangements, and warranty status of the fourteen (14) TM2500 units located at San Juan and Palo Seco, as well as the three (3) Pratt & Whitney Power Systems FT8 MOBILEPAC gas turbine units located at Palo Seco.

6. To that end, the PREB determined that additional information was required and ordered Genera and PREPA to submit, on or before September 9, 2026, their responses to the Requirements of Information (“ROIs”) included as Attachment A to the *August 31 Resolution*. The PREB further directed that the responses be complete and organized by question number, supported by the underlying documents requested, and accompanied, where applicable, by spreadsheets in native format with all formulas and links intact.

7. The PREB further scheduled a Technical Conference for September 15, 2026, at 9:30 a.m., and directed Genera and PREPA to appear prepared to answer questions from the PREB, its staff, and consultants regarding the matters addressed in the *August 31 Resolution*.

8. In compliance with the *August 31 Resolution*, Genera hereby submits, as **Exhibit A** to this Motion, its responses to most of the ROIs directed to Genera in Attachment A to the *August 31 Resolution*, together with the supporting information and documentation identified

therein. Despite its best efforts, Genera could not provide responses to ROIs 5(j), 6(a), 6(b), 7(e), 7(f), 7(g), 8(c), 11, 12, 13, 14, 15, 16, 21, 22 and 26. These ROIs require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension of thirty (30) days to respond to these ROIs to ensure that our answers meet the required level of detail and precision.

9. Moreover, Genera respectfully requests that the Technical Conference currently scheduled for September 15, 2026, be rescheduled to a date after all responses to the ROIs have been provided. This extension is sought in good faith to avoid duplicative proceedings and to maximize the efficient use of the PREB's and Genera's resources.

10. Moreover, Attachments 3 and 4 to the Responses contain confidential and protected information. Accordingly, Genera requests that Attachments 3 and 4 be kept confidential pursuant to PREB's Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended on September 21, 2016. Through a separate filing, within the next ten (10) days, as set forth in Section A.2 of the PREB's policy on Management of Confidential Information, Genera will present a memorandum of law in support of its request to treat as confidential, and to protect as such, those attachments.

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the foregoing and:

- (a) Receive Genera's responses to the Requirements of Information attached hereto as Exhibit A, and deem Genera in partial compliance with the requirement of the *August 31 Resolution* to submit its responses to the ROIs directed to Genera.

(b) Grant Genera an extension of thirty (30) days to respond to ROIs 5(j), 6(a), 6(b), 7(e), 7(f), 7(g), 8(c), 11, 12, 13, 14, 15, 16, 21, 22 and 26.

(c) Accept Attachments 3 and 4 as confidential filings and allow Genera to present a Memorandum in Support of the confidentiality designations within ten (10) days of this filing.

In San Juan, Puerto Rico, this September 9, 2026.

It is hereby certified that this motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case, including: arivera@gmlex.net; RegulatoryPREBorders@lumapr.com; Emmanuel.porrogonzalez@us.dlapiper.com; laura.rozas@us.dlapiper.com; margarita.mercado@us.dlapiper.com.

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s/Luis R. Román Negrón

Luis R. Román Negrón

RUA 14,265

Exhibit A

Docket Number: NEPR-MI-2024-0005

In Re: Priority Plan for Electric Grid Stabilization

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

1. Provide a current fleet status table for each of the fourteen (14) TM2500 turbine-generator units, identifying for each unit: unit designation; specific model designation and nameplate rating, noting any variation in model or rating among the fourteen (14) units; gas generator and package serial numbers; site (San Juan or Palo Seco); current status (in service; available but not operating; out of service; under repair; permanently unavailable); the date the unit was last removed from service, if applicable; the cause of removal; and the expected return-to-service date. In addition, provide a month-by-month summary, from March 2024 through the present, of the number of units in service and out of service and the aggregate capacity (MW) available to the system operator from this fleet.

Response:

Please see Attachment 1 & 2.

2. Describe the measures Genera is taking, with dates, to restore the full availability of this fleet through December 31, 2027, as directed by PSP Activity No. 1. For each unit currently out of service, identify: the required scope of repair; each vendor quotation or budgetary proposal obtained, with vendor, date, amount, and validity period; the estimated repair cost and lead time; each internal or corporate approval required to proceed, the date such approval was requested, and its current status; and the source of funding identified for the work. Where commencement of any repair has awaited internal or corporate approval, or the identification of a funding source, for more than thirty (30) days, explain the reason for the delay.

Response:

Please see Attachment 2- "Detail Plan" tab.

3. Provide copies of all reports, presentations, status tables, condition assessments, correspondence, and any other information—formal or informal—that Genera has provided since PREPA's acquisition of the units to the Puerto Rico Public-Private Partnerships Authority, to PREPA, or to any other governmental entity or third party regarding the status, condition, availability, maintenance, repair, or funding needs of the TM2500 temporary generation units, identifying the recipient and date of each item. If any information provided is inconsistent with, or more current than, the information provided to the Energy Bureau in response to this Resolution and Order, identify and explain the inconsistency.

Response:

Please see Attachment 3.

4. The fourteen (14) TM2500 units are dual-fuel capable. For each of the two sites, San Juan and Palo Seco: confirm that the fuel infrastructure required to support the operation of the units on both natural gas and diesel—including gas supply and interconnection, diesel storage tanks, pipelines and transfer systems, pumps, unloading and metering facilities, and fuel-quality testing and certification arrangements—is in place and fully operational; identify any component that is not in place or not operational, its effect on the ability of the units to operate on each fuel, and the corrective action, cost, schedule, and funding source required to restore or complete it; and describe the periodic testing performed to verify the ability of the units to start and operate on each fuel, providing the date and result of the most recent such test for each site.

Response:

Please refer to Genera's Motion titled "Requerimiento de Información," filed in Docket No. NEPR-AP-2024-0001.

5. Regarding the failures of Palo Seco TM-2500 Units 3 and 4:

- (a) What kind of damage did both TM-2500 Palo Seco units 3 and 4 suffer?

Response:

Palo Seco Unit 3 tripped offline due to an exhaust spread issue. Palo Seco Unit 4 tripped offline due to damaged Variable Stator Vanes (VSVs).

- (b) What was the reason for the failures?

Response:

The suspected cause of the Palo Seco Unit 3 failure is uneven fuel distribution resulting from dirty or restricted fuel nozzles.

The suspected cause of the Palo Seco Unit 4 failure is frequent starts, stops, load changes, and dispatch cycling, which repeatedly exercise the Variable Stator Vane (VSV) system. This repeated cycling increases wear on the actuators, linkages, bushings, and other feedback components.

- (c) Did Genera conduct a root-cause analysis to determine the failures? If so, provide it.

Response:

Genera engaged GE, the Original Equipment Manufacturer, to deliver technical support and conduct a thorough investigation into the factors preventing the units from achieving the expected OEM runtime and is still pending completion.

- (d) Were the failures related to noncompliance with the maintenance schedules or the operational hours regime?

Response:

Genera can provide this information once GE, the Original Equipment Manufacturer, delivers and conducts a thorough investigation.

- (e) What is the estimated downtime for both units?

Response:

Palo Seco Unit 3: The fuel nozzles have been replaced. The unit is currently awaiting a replacement Main Power Transformer following the failure of the existing transformer. The estimated return-to-service (RTS) timeframe is approximately 6–8 weeks.

Palo Seco Unit 4: During VSV repair activities, the contractor determined that the required repairs could not be completed on site and recommended sending the unit to the mainland for repair. The estimated RTS timeframe is approximately 160 days from contract award. Funding for the repair has not yet been identified.

- (f) What measures does Genera consider preventing this type of failure in the future?

Response:

Genera engaged GE, the Original Equipment Manufacturer, to deliver technical support and conduct a thorough investigation into the factors preventing the units from achieving the expected OEM runtime and is still pending completion.

- (g) Do the four Palo Seco TM-2500 units have sufficient natural gas and diesel, consistent with their dual-fuel capability, to ensure continued operation in accordance with the energy dispatch requirement?

Response:

Currently, there are no known limitations for the supply of natural gas or diesel to the TM units at Palo Seco.

- (h) Is the current fuel infrastructure capable of supporting the necessary operation of these units in accordance with the energy dispatch requirements?

Response:

Currently, there are no known limitations for the supply of diesel to the TM units at Palo Seco; there are known limitations on diesel supply at San Juan TM units.

- (i) In the last sentence of the first paragraph of page 7 of the June 25, 2026 submission, Genera stated that it “obtained a budgetary proposal from Siemens Energy (Proposal SF262532095, Rev. 00, dated March 31, 2026) for the LM2500/LM2500+ SAC hot-section exchange (Exhibit 6 to this Submission), and was in the administrative process of issuing a Notice to Proceed when the work was suspended for lack of executable budget authority following the April 15, 2026, Final Order.” Why, if the Energy Bureau approved a \$17 million O&M budget sized for seventeen (17) units as part of the last Rate Case, while only fourteen (14) units are in place, did Genera state that it suspended repairs to the units due to a lack of an executable budget?

Response:

Prior to April 15, 2026, Genera had access to the LGA OMA Reserve Account and, alternatively, the Necessary Maintenance Expenses (NME) budget, which could

have been used to cover these two hot-section exchanges following a re-apportionment request to PREB. However, after April 15, 2026, the NME budget was reduced from \$113.3 million to \$53.5 million, and no Reserve Account budget was assigned. Although Genera intended to utilize these budget lines for the required costs, the reductions and the specific allocation of approved line items in the permanent rate now prevent any re-allocation of NME funds. Additionally, Genera has not received deposits for the LGA OMA Reserve Account or the emergency account approved by PREB.

- (j) For each Palo Seco unit that has required the replacement or refurbishment of fuel nozzles or other fuel-system components at any time since January 1, 2024: state the date the need was identified, the date the parts or services were ordered, the vendor, the quoted cost and delivery time, and the date the work was or is expected to be completed; state the effect of any pending work on the unit's ability to operate on each fuel; and explain any interval greater than ninety (90) days between identification of the need and completion of the work.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

- (k) State the volume of diesel fuel currently stored on site at Palo Seco, the storage capacity, and the number of days of continuous operation of the four (4) units that the current inventory supports under best-case and worst-case dispatch assumptions; and describe the arrangements, and the time required, for replenishment.

Response:

Genera currently has 27,842 barrels of diesel fuel stored on site, with a total storage capacity of 38,437 barrels. Assuming a maximum consumption of approximately 1,200 barrels per day per unit for the four (4) units, the current inventory would support approximately eight (8) days of continuous operation, assuming that these are the only units consuming from the stored diesel inventory.

Diesel is replenished by pumping fuel from PRE, the supplier, to Palo Seco at an approximate rate of 1,300 barrels per hour. An additional four (4) hours should be considered to certify the quality of the product once it has been received in the storage tanks.

6. GE Vernova performed a hot-section and combustor exchange on TM2500 Unit 557-238 at Palo Seco, at a cost of \$3,752,573.24. Siemens Energy, in turn, submitted a proposal for a similar hot-section repair of Palo Seco TM2500 Units 3 and 4, at a cost of \$4.5 million, which includes credits of \$600,000 for the Units 3 and 4 hot-section modules. The GE Vernova price for Unit 557-238 and the Siemens Energy proposal prices for Units 3 and 4 are summarized in the following tables.

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

- (a) Were these prices obtained through a competitive procurement process in which both vendors participated under the same terms, conditions, and scope of work? If so, identify the solicitation and provide the record of the process; if not, explain why not.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

- (b) Given that the repair of Unit 557-238 was performed on an emergency basis, explain why the GE Vernova price does not reflect a credit for the hot-section module, comparable to the \$600,000 credit included in the Siemens Energy proposal for Units 3 and 4. State whether such a credit was requested or negotiated with GE Vernova and, if not, why not.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision

- (c) State whether each of these hot-section exchanges corresponds to scheduled maintenance required by the manufacturer upon reaching its prescribed operating thresholds, or to an unforeseen or catastrophic failure. Provide the supporting documentation, including accumulated operating hours, inspection findings, and any failure reports.

Response:

Most of these hot-section exchanges correspond to unforeseen conditions detected through borescope studies and not for reaching its prescribed operating thresholds. Genera engaged GE, the Original Equipment Manufacturer, to deliver technical support and conduct a thorough investigation into the factors preventing the units from achieving the expected OEM runtime and is still pending completion.

- (d) If the condition of the three (3) TM2500 units resulted from their sustained high utilization during the declared electrical generation emergency following the recent hurricanes in Puerto Rico—such that the units exceeded the manufacturer's maintenance thresholds without the opportunity to perform the required preventive maintenance, and that circumstance is duly documented—state whether the cost of these repairs would qualify for federal funding. Identify the applicable federal program and its eligibility criteria, and state whether this alternative has been evaluated or pursued.

Response:

Due to constraints in generation capacity and operating reserves, the units could not be removed from service for scheduled maintenance, which led to additional unforeseen damage.

Genera cannot confirm whether repairs for these units will be eligible for FEMA funding under the same FEMA obligated project which funded the purchase. The obligated funding for this project is controlled by PREPA. FEMA funding eligibility depends on compliance with FEMA's requirements, including the fact that FEMA previously funded the purchase of the units, while Subrecipients are responsible for ongoing maintenance costs. Additionally, to qualify under FEMA's Section 428 FAAS Program, it must be demonstrated that the units sustained damage and that the associated repair costs are thoroughly documented and directly linked to eligible disaster-related circumstances.

Furthermore, as a condition of the project's obligated funding, payment for the EPA PSD permit and required emission controls (estimated at \$30 million) is necessary. Additionally, the original intent of this project included the purchase of three additional units, which remain pending.

Genera also tried to obtain funding from DOE, but it was denied because DOE understands these units are not permanently owned by PREPA yet.

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

- (a) Are the ten (10) units located near the San Juan Power Plant available for operation in accordance with the energy dispatch?

Response:

Seven (7) out of ten (10) units located in the San Juan Power Plant available for operation. However, six (6) of these units are operating needing hot-gas section exchange.

- (b) What limitations, if any, do these units have?

Response:

Please refer to Attachment 1 & 2.

- (c) Did any of these units experience an unexpected failure? If so, which unit? Explain in detail what happened.

Response:

Units 1 and 9 have multiple damages (Please see Attachment 1). Units 3, 4, 5, 6, 7, 8 and 10 need hot-gas section exchange based on borescope completed during June 2026.

- (d) Is the fuel infrastructure for both natural gas and diesel fuel sufficient to ensure the full operation of all the units? If not, what is the limitation? Explain in detail.

Response:

Please refer to Genera's Motion to Show Cause and in Compliance with the August 7 Resolution, filed on August 27, 2025, in Docket No. NEPR-IN-2025-0004.

- (e) Identify every failure or event since January 1, 2025, involving a shared or common system—including auxiliary switchgear, electrical interconnection or protection equipment, fuel supply, or water-treatment supply—that affected more than one unit simultaneously or removed more than one unit from service. For each such event, provide: the date and time; the units affected and the duration of each unit's outage; the root-cause analysis; the corrective and preventive actions taken and their completion status; and any repair that remains pending, with its estimated completion date.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

- (f) State whether the electrical installation supporting these units—including switchgear, breakers, relays and protection schemes, cable terminations, grounding, and environmental enclosures—is adequate for extended operation through December 31, 2027, as the PSP prescribes. Identify any component installed on a temporary or emergency basis that has not been brought to a standard suitable for extended operation, and describe the scope, cost, schedule, and funding source of any program to weatherize, enclose, or otherwise harden that installation.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

- (g) For each repair or refurbishment of these units or of their supporting electrical systems performed by a third-party contractor since January 1, 2025: identify the contractor and the scope of work; describe the acceptance testing and quality-assurance oversight applied to the work; state whether the equipment involved failed after the work was performed; and identify any claim, back-charge,

withheld payment, or other remedy that has been asserted or is under evaluation for deficient work.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

- (h) State the volume of diesel fuel currently stored on site at San Juan, the storage capacity, and the number of days of continuous operation of the ten (10) units that the current inventory supports under best-case and worst-case dispatch assumptions; describe the arrangements, and the time required, for replenishment and for the certification of delivered fuel; and identify any unit that is not presently capable of sustained operation on diesel, stating the reason and the corrective action planned.

Response:

Please refer to Genera's Motion to Show Cause and in Compliance with the August 7 Resolution, filed on August 27, 2025, in Docket No. NEPR-IN-2025-0004.

8. Provide the following information separately for each of the fourteen (14) turbine-generator units:

- (a) Unit identification: manufacturer; model designation; gas generator and package serial numbers; rated capacity; year of manufacture; date placed into commercial operation; current operational status (in service; available but not operating; out of service; under repair; permanently unavailable); and current condition and general assessment of the unit.

Response:

Please see Attachment 1 & 2.

- (b) Operating history: total operating hours since commissioning; operating hours for each of the past three years; number of starts and stops for each of the past three years; number of forced outages for each of the past three years; number of planned outages for each of the past three years; equivalent availability, if available; capacity factor, if available; for units out of service, the last date the unit operated; current accumulated operating hours; and current accumulated starts. Provide support for operating logs or reports where available.

Response:

Please see Attachment 1 & 2.

- (c) Maintenance history for at least the past three years: planned/preventive maintenance performed; corrective maintenance performed; major inspections; overhauls; component replacements; major repairs; emergency repairs; maintenance recommendations that remain outstanding; deferred maintenance; maintenance intervals established by the manufacturer; maintenance intervals followed; and any deviations from the manufacturer's recommended maintenance program. Provide copies of any available maintenance reports, inspection reports, work orders, service reports, maintenance logs, overhaul reports, technical reports, condition-monitoring reports, vibration-analysis reports, electrical-testing reports, thermographic inspections, and other relevant diagnostic reports. For each unit, state the manufacturer's recommended interval for each major inspection milestone—including hot-section inspection or exchange—together with the date, and the accumulated operating hours, at which each such milestone was last performed; the operating hours accumulated since; and, for any unit for which a milestone is past due, the date on which the past-due condition was first identified, the estimated cost and lead time of the work at that time, and each action taken since to procure and schedule it.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

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

GeneraPR | Expenses by Category - TM2500

Category	FY2024	FY2025	FY2026
Preventive Maintenance	\$ -	\$ 324,509	\$ 2,370,436
Corrective Maintenance	\$ -	\$ 1,173,700	\$ 1,852,047
Emergency Repairs	\$ -	\$ 119,637	\$ 309,549
Major Overhauls	\$ -	\$ -	\$ -
Spare Parts	\$ -	\$ 472,364	\$ 231,296
Labor	\$ -	\$ 20,769	\$ 2,115,361
External Contractors	\$ -	\$ 3,356,302	\$ 3,176,272
Engineering/Technical Services	\$ -	\$ 211,540	\$ 1,174,536
Other O&M Expenses	\$ -	\$ 9,888,580	\$ 5,631,911
TOTAL	\$ -	\$ 15,567,401	\$ 16,861,407

- (a) Identify whether the expenditures were incurred directly by the operator or through an O&M contractor.

Response:

The generating units were operated by an affiliate through an Intercompany Agreement. However, beginning in FY2025, Genera progressively began contracting more services directly. Therefore, the expenditure was incurred both through the affiliate and directly by Genera.

- (b) Provide costs by individual unit, rather than only as a fleet-wide total.

Response:

The expenditures are recorded collectively as expenses of the TM2500 fleet. Therefore, an individual unit cost breakdown is not available for the years covered by this request.

- (c) Provide the budget-to-actual for the \$17 million annual O&M allocation for FY2025 and FY2026, and state whether any portion of the allocation is attributable to units not sited between Palo Seco and San Juan (i.e., the difference between seventeen (17) funded units and fourteen (14) units in place). Identify any unspent balances and their disposition.

Response:**GeneraPR | Budget to Actuals - TM2500**

Fiscal Year	Budget	Actual
FY2024	\$ -	\$ -
FY2025	\$ 17,000,000	\$ 15,567,401
FY2026	\$ 17,000,000	\$ 16,861,407

10. State whether, during the rate review proceeding (Case No. NEPR-AP-2023-0003), Genera requested any funding beyond the annual \$17 million O&M allocation for the repair of failed TM2500 units. If so, identify: the filing, exhibit, or testimony in which each request was made; the unit(s) and repairs involved; the amount requested; and the disposition of each request in the Final Rate Order. If no such request was made, explain why Genera did not seek such funding in the rate case notwithstanding the condition of the units.

Response:

Genera did not request funding for hot-gas section exchanges because it was not anticipated that the units would require them at this time. According to OEM specifications, these units are expected to need a hot-gas section exchange every 12,500 hours when operating on ULSD, or every 25,000 hours if operating on natural gas. Based on projected usage, none of the units should have required a hot-gas section exchange during the rate period. However, borescope inspections completed in June 2026 revealed that the hot gas sections are not performing or lasting as expected. Genera has already engaged GE to conduct a specialized assessment to determine the underlying causes. Additionally, as detailed in Attachment 1, some units experienced forced outages after the rate case evidence submission deadlines

11. Identify every request that Genera has made, since it assumed operation of the units, to PREPA or to any other entity for funding of TM2500 repairs or maintenance outside the annual operations and maintenance budget, including any request for the funding or replenishment of any forced-outage, extraordinary-repair, or similar reserve account established under the operative agreements. For each request, state the date, the amount, the units and scope of work involved, the account or mechanism invoked, and the response received. Provide the funding history and current balance of each such account and, where Genera contends that an account was not funded or replenished, identify the party responsible and describe each step Genera took to pursue the funding and every alternative source of funds it evaluated.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

12. Provide a list of the most common technical problems experienced by the fourteen (14) units. For each problem, provide: description of the problem; affected unit(s); number of occurrences; date(s) of occurrence; root cause, if determined; corrective action taken; cost of repair; duration of outage; whether the problem has recurred; whether a permanent corrective action has been implemented; whether the problem was reported to the manufacturer/OEM; whether the problem was covered by warranty; whether a warranty claim was submitted; and the status of any warranty claim. Distinguish between recurring problems and isolated failures.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

13. Provide an incident report including: unit identification; date and time of the incident; operating condition at the time of failure; description of the failure; location/component where the short circuit originated; cause of the short circuit; cause and extent of the resulting fire; equipment and components damaged; personnel safety impacts, if any; and duration of the resulting outage. Provide copies of the failure investigation report, root cause analysis (RCA), electrical investigation, fire investigation, inspection reports, photographs, testing results, manufacturer/OEM assessment, insurance investigation (if applicable), and any independent third-party investigation.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

14. Describe in detail the corrective actions: how the damaged equipment was repaired or replaced; components replaced; testing performed following the repair; commissioning/recommissioning procedures; whether the unit returned to service; the date the unit returned to service; total repair cost; and total outage duration.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision

15. Identify all preventive actions taken to prevent recurrence, including: design modifications; protection-system modifications; electrical protection changes; relay/protection-setting changes; additional inspections; additional testing; changes to maintenance procedures; changes to operating procedures; replacement of similar components in other units; inspections of the remaining thirteen (13) units; recommendations issued to the other units; and any OEM recommendations. Indicate whether these preventive actions were implemented across all fourteen (14) units and provide documentation demonstrating completion.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

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

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

17. The rate case record (Case No. NEPR-AP-2023-0003) indicates that Genera put in place an intercompany agreement to permit certain parts and labor for the TM2500 units to be reimbursed as “passthrough” costs to a subsidiary of Genera's parent company, rather than as a fixed fee. Identify by full legal name each entity in the corporate chain from Genera PR LLC to the ultimate parent that receives or has received any portion of these passthrough payments and provide organizational charts showing each entity's ownership percentage.

Response:

Genera has identified Genera Services LLC as the entity relevant to the intercompany arrangement described in the question. Any additional information regarding other NFE entities that receive or have received any portion of the referenced passthrough payments, including the requested ownership information and organizational charts, should be requested by PREB directly from NFE.

18. Provide a complete ledger, by invoice, of all passthrough charges billed through the Intercompany Services Agreement from July 1, 2023, through the present, broken down by: (a) parts and materials; (b) labor; (c) specialized services; and (d) overhead or management fees, for each of the fourteen (14) TM2500 units individually.

Response:

Please refer to Attachment #4, tab "Detailed Expenses – TM2500".

19. Were the rates, markups, or pricing terms in the Intercompany Services Agreement established through an arm's-length process? Provide any benchmarking analysis, independent cost estimates, or comparable market-rate studies used to set intercompany pricing. If none exists, explain why not.

Response:

The intercompany agreement provides for pass-through of expenses actually incurred in the performance of O&M Services and labor rates. Expenses incurred are understood to reflect arm's-length negotiation between Genera affiliates and third-party vendors. No mark-up is permitted under the intercompany agreement.

20. Section 3.2 of the Intercompany Services Agreement grants Genera PR LLC audit rights over Genera Services LLC's books and records. Has Genera PR LLC ever exercised this audit right? If so, provide the results. If not, explain why it has not been exercised given the materiality of the passthrough costs to ratepayers.

Response:

The OMA process for pass-through invoices includes vetting by Genera and audit by P3A. The P3A has responsibility and authority to review all pass-through amounts, which ensures contract compliance. Third-party costs must be documented and substantiated to receive approval. P3A has conducted and continues to conduct thorough, detailed vetting of invoices and pass-through expenditures to ensure contract compliance. This two-level review supports reasonable and prudent cost management.

21. Provide all inspection reports, condition assessments, and GE field service reports for each of the fourteen (14) TM2500 units covering the period from PREPA's acquisition through the present. Identify any unit that has experienced a major inspection milestone (Hot Section Inspection or Major Overhaul) and describe what was done.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision

22. As of the December 2025 hearing in Case No. NEPR-AP-2023-0003, Genera represented that 21 Field Operator Technicians, 9 Field Supervisors, and 1 Senior Gas Turbine SME, among others, support TM2500 operations, with staffing allocated across all units based on system needs rather than assigned per unit. Provide the current staffing matrix for TM2500 operations, including the number of personnel on each shift at Palo Seco and San Juan, and demonstrate how this staffing level is consistent with GE's recommended operations and maintenance staffing for aeroderivative turbines.

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision.

23. Identify the single contractor entity or group of entities providing TM2500-related professional services and labor, confirm whether they are affiliates of Genera or of New Fortress Energy, and provide the full text of each engagement or service agreement.

Response:

The TM2500 units have been operated as part of the Genera fleet since April 1, 2026. All personnel providing day-to-day operational labor for the TM2500 units are Genera employees; therefore, there is no separate contractor providing operational labor services.

For specialized maintenance, technical support, and other professional services, Genera utilizes GESA/GE, as applicable, as well as other qualified and approved service providers based on the specific maintenance requirements of the TM2500 units.

24. The March 15, 2024 Asset Purchase Agreement includes a side letter under which, upon written request of the Buyer no later than twelve (12) months following closing, the Seller would provide major maintenance for up to seven (7) units—expressly including repair and/or replacement of all parts identified as damaged or not serviceable while Hot Section major maintenance is performed—at the Seller's sole cost, with performance guaranteed by New Fortress Energy Inc.:

- (a) State whether Genera recommended, prepared, or was aware of any written request invoking this accommodation; identify the units for which it was requested; and provide the requests and all related correspondence.

Response:

Between 2023 and 2024, Genera's affiliate conducted major maintenance on 9 out of 14 TM units, and another was conducted by Genera (See Attachment 1). Because of that, not all units required maintenance within the 1-year period of Asset Purchase Agreement (including side letter) that PREPA negotiated and managed, nor were grid conditions amendable to all units being removed for major maintenance. Today, 12 units require major maintenance due to their ongoing dispatch above expected usage in the absence of new temporary or permanent alternative generation sources. In 2024, Genera requested use of the major maintenance services, and three of them were already completed. The remainder contractual major maintenance is under negotiation, leaving eight additional TM units in need of major maintenance.

Maintenance for the remaining eight units could be funded through the Reserve Account or the emergency account; however, both accounts remain unfunded, as PREPA has not deposited any funds into them.

Out of the 12 units that require major maintenance service, work plan and intended funding source is the following:

Number of Units	Funding Source	Status
2 (San Juan 2 & 9)	Re-allocated from \$17 million O&M	Completed/ In progress
4 (TBD)	Reserve Account (when funded)	Pending
4 (TBD)	Major Maintenance by Seller	Pending
2 (TBD)	Requested additional funding to PREB	Pending

- (b) For each major maintenance performed under the side letter, provide the completion certification from General Electric or a GE-qualified third party.

Response:

Please see Attachment 5 & 6.

- (c) If the accommodation was not invoked or was invoked for fewer than seven (7) units, explain why, and identify who made that decision.

Response:

Please see response to 24(a)

- (d) Explain why funding from ratepayer-sourced mechanisms is being sought for hot-section restoration of Palo Seco Units 3 and 4—work of the same kind covered by the side letter—and state whether any claim was made against the Seller or its parent guarantor before seeking such funding.

Response:

Please see response to 24(a)

- (e) Provide a complete accounting of every repair, replacement, or major maintenance performed on any of the fourteen (14) units at the cost of the Seller or any of its affiliates—whether under the side letter to the APA or under any similar accommodation, credit, or coupon arrangement contained in any other agreement or side letter—identifying, for each: the unit; the scope of work; the dates of performance; the party that bore the cost; and the completion certification obtained. State the number of such accommodations used to date and the number that remains available.

Response:

Please see Attachments 5 & 6. These services were paid by Genera affiliates directly to Siemens. Any additional information regarding other NFE entities regarding any portion of the referenced transactions should be requested by PREB directly from NFE.

25. For each of the fourteen (14) units, state whether any manufacturer, seller, or third-party warranty is or was in effect at any time since PREPA's acquisition. Identify each warranty claim submitted, its amount, and its status, and provide copies of all warranty documentation.

Response:

These units were purchased pre-owned by PREPA, and their operation was subsequently transferred to Genera in March 2024. Genera is not aware of any valid manufacturer or third-party warranties.

With respect to any seller warranties, Genera is neither a party to, nor responsible for, any warranties that may arise under the purchase agreement between PREPA and the seller. Accordingly, information regarding any such warranties, related claims, and supporting documentation should be requested directly from PREPA and/or P3A.

26. For each of the three (3) Pratt & Whitney Power Systems (PWPS) FT8 MOBILEPAC gas turbine units in Palo Seco, provide the information specified in Question 9(a) through 9(c) above (unit identification; operating history; and maintenance history, with supporting documents).

Response:

Many of the questions contained in this document require highly technical, specific, and detailed information. In order to provide accurate and comprehensive responses, Genera will need additional time to gather the necessary documentation and coordinate with relevant stakeholders. We respectfully request an extension to ensure that this response meets the required level of detail and precision

27. Provide the annual operations and maintenance expenditures for the FT8 MOBILEPAC units for each of the past three fiscal years, broken down as follows:

GeneraPR | Expenses by Category - FT8 MOBILEPACK

Category	FY2024	FY2025	FY2026
Preventive Maintenance	\$ -	\$ -	\$ 146,743
Corrective Maintenance	\$ -	\$ -	\$ 299,518
Emergency Repairs	\$ -	\$ -	\$ 21,020
Major Overhauls	\$ -	\$ -	\$ -
Spare Parts	\$ -	\$ -	\$ -
Labor	\$ -	\$ -	\$ -
External Contractors	\$ -	\$ -	\$ -
Engineering/Technical Services	\$ -	\$ -	\$ -
Other O&M Expenses	\$ -	\$ -	\$ 15,972
TOTAL	\$ -	\$ -	\$ 483,253

(a) Identify whether the expenditures were incurred directly by the operator or through an O&M contractor.

Response:

The generating units were operated by Genera, and the expenses were incurred directly by the operator.

(b) Provide costs by individual unit, rather than only as a fleet-wide total.

Response:

The expenditures are recorded collectively as expenses of the FT8 Mobilepack fleet. Therefore, an individual unit cost breakdown is not available for the years covered by this request.

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

Response:

Currently, 27 MW of installed capacity is available to the system operator, corresponding to Unit 1.

ATTACHMENT 1

San Juan TM's31-Aug-26

Unit	Status	Reason	Action Plan	Comments
1	Not Available	13.8Kv Arc VSV stuck	Breaker cubicle repairs in progress by Genera/RGE VSV Repair CR#374639	Estimated return to service 14 weeks after VSV repair contract has been awarded.
2	Available			HS replaced AUG-2026
3	Available Limited	Only Gas Operation HPT 1st stage excessive corrosion	Need to replace Hot Section and nozzles to run on Diesel	Looking for Hot Section availability
4	Available Limited	Only Gas Operation HPT 1st stage excessive corrosion	Need to replace Hot Section and nozzles to run on Diesel	Looking for Hot Section availability
5	Available		Due for Hot Section replacement.	
6	Not Available	Damaged STG 16 blade Hot Section Damage	Repair Compressor stage 16 Replace Hot Section	Awaiting approval Contract Req with Siemens 00368192 for 2 Hot Section Swaps.Estimated return to service 6 to 8 weeks after contract is awarded.
7	Available		Due for Hot Section replacement.	
8	Not Available	Damaged VSV Section 0 T48 Spread HH Hot Section Damage	Waiting on VSV Repair estimates Repair Fuel Nozzles Source Hot Section	GE to supply Hot Section that will be available until November 2026. Contract 111385-TO#7. Estimated return to service Late December. VSV failure Contract Request #374639
9	Not Available	Switchgear explosion HGS+bearing 4/5 replace	Source complete switchgear Engine sent to shop in Texas for repairs.	Switchgear replacement cost 250,000 delivery time 22 weeks Engine Inspection/Repair with GESA 107284-TO#7 Estimated return to service Jan 2027
10	Available		Due for Hot Section replacement.	

Palo Seco TM's

Unit	Status	Reason	Action Plan	Comments
1	Not Available	High Pressure Turbine section STG1&2 burned blades	GE to supply Hot Section that will be available until November 2026. Contract 111385-TO#7.	Estimated return to service Late December.
2	Available Limited	Only Gas Operation HPT 1st stage excessive corrosion	Need to replace Hot Section and nozzles to run on Diesel	Looking for Hot Section availability
3	Not Available	High Temperature Spread Hot Section Damage	Replace nozzles. Contract Request with Siemens 00368192 for 2 Hot Section Swaps	Estimated return to service 6 to 8 weeks after contract is awarded.
4	Not Available	VSV Failure, overall wear. Hot Section Damage	Send to Depot for Mayor overhaul. Run Hours 43,186. Mayor due at 50,000 hrs. Repair offer received.	Estimated return to service 16 to 20 weeks after contract is awarded.

Palo Seco MobilePac's

Unit	Status	Reason	Action Plan	Comments
MP1	Available		Although unit is available it is due for Hot Section inspection and Service	Working with ARG and Mitsubishi to plan the service after the high demand months
MP2	Not Available	High scavenge oil pressure Hot Section in need of repairs	REQ 363941 - For repairs at Mitsubishi Power Aero Repair Depot. Contract 111804 approved by FOMB 10-JUL-26	Estimated return to service, 3rd week of September.
MP3	Not Available	High scavenge oil pressure	Under review with Mitsubishi, high possibility of needing Depot repair.	Estimated return to service. 16 weeks after funds and contract are approved.

Palo Seco Frame 5's

Unit	Status	Reason	Action Plan	Comments
PS 1-1	Not Available	Gear Box Failure	Install refurbished gear box and reallign. PEC TO#5	Estimated return to service. Jan 2027.
PS 1-2	Available			
PS 2-1	Not Available	Generator Rotor Failure	Replace generator rotor and reallign	Awaiting approval of Task Order with PEC.

There are only 3 Hot Sections available in the market 1 from GE and 2 from SE, these are being locked in by Genera. 2 more agreements should be made with GE an SE to repair the HS returned and supply back to Genera

buscar BSI para sn juan 2 y 3						
	Type	Hot Section Overdue	S/N	HRS	Priority	BSI
Con GE	PLUS	Palo Seco 1	557-238	18,954	1	yes
Con SE	BASE	Palo Seco 3	481-559	42,483	2	yes
Con SE	PLUS	San Juan 2	557-251	16,870	3	2024
	PLUS	San Juan 3	557-258	15,681	3	yes
	PLUS	San Juan 6	557-254	14,975	3	yes

Palo Seco 4	481-717	43,188
Palo Seco 2	557-121	19,670

5.5

San Juan 2557-25116869.95

San Juan 3557-25815680.9

San Juan 6557-25414974.99

Palo Seco 1557-23818953.88

Palo Seco 3481-55942482.97

Date28-Aug-26

15000

25000

50000

SITE	Turbine Number	MW Capacity vs Actual	GG SERIAL Number	PT SERIAL Number	Start Attempts	Fired Starts	Engine Hours	Last Semi Annual Date	Next Semi Annual	Last Change Fuel Nozzle	Last Hotsection Date Hours	Next Hot Section Date Hours	Next Hot Section by Condition	Gas Only Next Hot Section Hours	Major Overhaul Date Hours	Comments	Forced Outage Date
PSTP	GT01	250	557-259	557-259	749	709	18,954	26-Jan-26	25-Jul-26		19-May-24		Needed			FORCED HOT SECTION DAMAGE	2-Sep-25
										9,423	9,531	24,531		34,531	50,000	Seller Service Used 05/17/2024	
	GT02	250	557-121	557-121	794	751	21,102	20-Jan-26	19-Jul-26		TBD		Needed			Seller Service Used 05/02/2024	
											Overdue				50,000		
	GT03	200	481-559	481-559	1,286	929	42,482	24-Jan-26	23-Jul-26		-		Needed			FORCED	3-Dec-25
											-				50,000	High Temperature Spread	
	GT04	200	481-717	481-717	1,362	1,050	43,186	26-Jan-26	25-Jul-26		-		Needed			FORCED VSV FAILURE	13-Jun-25
											-				50,000	Seller Service Used 05/02/2024	
SJTP	GT01	250	557-238	557-238	-	-	16,173	5-Feb-26	4-Aug-26		15-Jul-23					FORCED	22-Jan-26
										12,812	3,361	18,361		28,361	50,000	AUX Switchgear Explosion	
	GT02	2525	557-251	557-251	1,455	1,321	18,223	11-Feb-26	10-Aug-26		13-Aug-26					Major Repair Completed Using TM O&M Funding	
											17,903	32,903		42,903	50,000		
	GT03	2525	557-258	557-258	1,385	1,236	18,420	16-Feb-26	15-Aug-26		TBD		Needed				
											Overdue				50,000		
	GT04	2525	557-268	557-268	1,231	1,117	15,617	21-Feb-26	20-Aug-26		1-Feb-24		Needed				
										10,148	5,469	20,469			50,000		
	GT05	2525	557-252	557-252	1,490	1,444	20,770	27-Feb-26	26-Aug-26		20-Jul-23		Needed				
										16,630	4,140	19,140		29,140	50,000		
	GT06	2525	557-254	557-254	717	693	16,765	3-Mar-26	30-Aug-26		TBD		Needed			FORCED HOT SECTION DAMAGE	17-Jun-26
											Overdue				50,000		
	GT07	2525	557-230	557-230	749	707	18,438	10-Mar-26	6-Sep-26		17-Jan-24		Needed				
										16,035	2,403	17,403		27,403	50,000		
	GT08	250	557-242	557-242	1,026	966	16,778	20-Mar-26	16-Sep-26		26-Jan-24		Needed			FORCED	3-Dec-25
										11,291	5,487	20,487		30,487	50,000	High Temperature Spread	
	GT09	250	557-266	557-266	-	-	12,294	13-Aug-25	Sent to Depot		Ongoing		Needed			FORCED HOT SECTION DAMAGE	8-Jan-25
												15,000		25,000	50,000	SW Explosion- Using TM O&M Funds	
	GT10	2525	557-262	557-262	1,082	1,040	20,995	26-Mar-26	22-Sep-26		5-Feb-24		Needed				
										15,433	5,562	20,562		30,562	50,000		

LEGEND:

Major Maintenance Completed by Seller

Major Maintenance Needed Per Borescope

Major Mainenance Overdue by OEM Date

Major Maintenance Completed or Ongoing

NOTES:

Each Major Maintenance Estimated Cost \$3.5 to \$4 million

TMs Hours of Operation

Friday, August 28, 2026

San Juan	Start Attempts	Fired Starts	Running Hours
GT-01			16,173
GT-02	1,455	1,321	18,223
GT-03	1,385	1,236	18,420
GT-04	1,231	1,117	15,617
GT-05	1,490	1,444	20,770
GT-06	717	693	16,765
GT-07	749	707	18,438
GT-08	1,026	966	16,778
GT-09			12,294
GT-10	1082	1040	20,995

Friday, August 28, 2026

Palo Seco	Start Attempts	Fired Starts	Running Hours
GT-01	749	709	18,954
GT-02	794	751	21,102
GT-03	1,286	929	42,482
GT-04	1362	1050	43,186

TMs Usage Factor

San Juan	
GT-01	N/A
GT-02	0.293
GT-03	0.316
GT-04	N/A
GT-05	0.321
GT-06	0.346
GT-07	0.363
GT-08	0.220
GT-09	N/A
GT-10	0.400

Palo Seco	
GT-01	0.061
GT-02	0.629
GT-03	0.375
GT-04	0.000

Days		Hours	
8/19/2025		374	8,976
Hours Used		Usage	
18,680	274	0.03	
16,846	4,256	0.47	
40,799	1,683	0.19	
43,186	0	-	
7,459	8,713.54	N/A	
15,554	2,669.00	0.30	
14,263	4,157.00	0.46	
N/A	N/A	N/A	
16,403	4,367.00	0.49	
13,424	3,341.00	0.37	
13,762	4,676.00	0.52	
15,642	1,136.00	0.13	
N/A	N/A	N/A	
16,157	4,838.00	0.54	

HOT SECTION REPLACEMENT SCHEDULE

Updated 28-Aug-26		12500		50000						
SITE	Turbine Number	Running Hours	Last Borescope Inspection	Next Borescope Inspection	Lastest Hot Section Hours	Next Hot Section 12500hrs	Next Hot Section Date	Mayor Inspection Depot	Borescope Inspection Recommendation	Comments
San Juan	TM01	16,173	Jun-26	Jan-27	3,361	15,861	Overdue	16-May-34	Serviceble	
	TM02	18,223	Jun-26	Jan-27	17,903	30,403	8-Jun-29	27-Nov-33	Serviceble	HS replaced AUG-2026
	TM03	18,420	Jun-26	Jan-27		12,500	Overdue	10-Nov-33	Not Seviceble	Need to replace HS - Confirmed by BSI
	TM04	15,617	Jun-26	Jan-27	5,469	17,969	Overdue	2-Jul-34	Not Seviceble	Damaged HS (BSI result) altough hours not reached
	TM05	20,770	Jun-26	Jan-27	4,140	16,640	Overdue	28-Apr-33	Not Seviceble	Overdue for HS replacement confirmed by BSI
	TM06	16,765	Jun-26	Jan-27		12,500	Overdue	28-Mar-34	Not Seviceble	Overdue for HS replacement confirmed by BSI
	TM07	18,438	Jun-26	Jan-27	2,403	14,903	Overdue	9-Nov-33	Not Seviceble	Overdue for HS replacement confirmed by BSI
	TM08	16,778	Jun-26	Jan-27	5,487	17,987	Overdue	27-Mar-34	Not Seviceble	Damaged HS (BSI result) altough hours not reached
	TM09	12,294	Jun-26	Jan-27		12,500	Overdue	5-Apr-35	Not Seviceble	Damaged HS (BSI result) altough hours not reached
	TM10	20,995	Jun-26	Jan-27	5,562	18,062	Overdue	10-Apr-33	Not Seviceble	Overdue for HS replacement confirmed by BSI
Palo Seco	TM01	18,954	Jun-26	Jan-27	9,531	22,031	11-May-27	27-Sep-33	Not Seviceble	Damaged HS (BSI result) altough hours not reached
	TM02	21,102	Jun-26	Jan-27		12,500	Overdue	1-Apr-33	Not Seviceble	Overdue for HS replacement confirmed by BSI
	TM03	42,482	Jun-26	Jan-27		12,500	Overdue	15-May-28	Not Seviceble	Overdue for HS replacement confirmed by BSI
	TM04	43,186	Jun-26	Jan-27		12,500	Overdue	17-Mar-28	Not Seviceble	Overdue for HS replacement confirmed by BSI

Run Factor 0.5

Borescope Inspection Dates and Results

SITE	Turbine Number	Date	Findings
SJTP	GT01	June-26	VSV actuation system failed to move freely Hot Section is SERVICEABLE - Replace stage 1 borescope plug
	GT02	June-26	NOT SERVICEABLE - Combustor Cracks HPT copious amounts of material missing
	GT03	June-26	NOT SERVICEABLE - Combustor burn through HPT cooling holes plugged and burn through
	GT04	June-26	NOT SERVICEABLE - Combustor missing rivets/burn through HPT Trailing edge heavy erosion
	GT05	June-26	NOT SERVICEABLE - Combustor cracks/burn through HPT Serviceable light erosion
	GT06	June-26	NOT SERVICEABLE - Compressor STG16 blade damage HPT Burn trough holes/ heavy erosion
	GT07	June-26	NOT SERVICEABLE - Combustor burn through and cracks HPT Damage, missing material
	GT08	June-26	NOT SERVICEABLE - Combustor burn through HPT Burn trough holes/ heavy erosion
	GT09	June-26	NOT SERVICEABLE - Combustor burn through HPT Burn trough holes/ heavy erosion
	GT10	June-26	NOT SERVICEABLE - Combustor cracks/burn through HPT Burn trough holes/ Rubbing
PSTP	GT01	June-26	NOT SERVICEABLE - Combustor heavy burn through. HPT Numerous large holes
	GT02	June-26	NOT SERVICEABLE - Dome burn through. HPT Erosion and missing material. LPT STG1 Damage
	GT03	June-26	NOT SERVICEABLE - Combustor burning on inner liners HPT Damage, missing material
	GT04	June-26	NOT SERVICEABLE - VSV stuck. Broken vane arm -Combustor Burn through and chipping -HPT Burn trough holes and rubbing

Date 28-Aug-26					LATEST		Before Latest		Before	
SITE	Turbine Number	Usage Factor	GG SERIAL Number	PT SERIAL Number	Hot Section Hours	Hot Section Date	Hot Section Hours	Hot Section Date	Hot Section Hours	Hot Section Date
PSTP	TM01	0.5	557-259	557-259	9,531	19-May-24				
	TM02	0.5	557-121	557-121						
	TM03	0.5	481-559	481-559						
	TM04	0.5	481-717	481-717						
SJTP	TM01	0.5	557-238	557-238						
	TM02	0.5	557-251	557-251	17,903	13-Aug-26				
	TM03	0.5	557-258	557-258						
	TM04	0.5	557-268	557-268						
	TM05	0.5	557-252	557-252						
	TM06	0.5	557-254	557-254						
	TM07	0.5	557-230	557-230						
	TM08	0.5	557-242	557-242						
	TM09	0.5	557-266	557-266						
	TM10	0.5	557-262	557-262						

ATTACHMENT 2

SITE	Turbine Number	GG SERIAL Number	PT SERIAL Number	Model	Type	Nameplate Rating ISO	Available Capacity MW	Current Status	Forced Outage Date	Cause	Plan /Action Taken	Estimated Return to Service
San Juan	TM01	557-238	557-238	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	0	Not Available	22-Jan-26	13.8Kv Arc and VSV stuck	VSV failure Contract Request #374639. Auxiliary Breaker failure, repair in progress.	14 weeks after VSV repair contract has been awarded.
	TM02	557-251	557-251	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	25	Available		-	Hot Section Replaced August 2026	
	TM03	557-258	557-258	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	25	Available Limited		Only Gas Operation: HPT 1st stage excessive corrosion	Plan/Source Hot Section Replacement.	
	TM04	557-260	557-268	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	25	Available Limited		Only Gas Operation: HPT 1st stage excessive corrosion	Plan/Source Hot Section Replacement.	
	TM05	557-252	557-252	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	25	Available		-	Due for Hot Section replacement.	
	TM06	557-254	557-254	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	0	Not Available	17-Jun-26	Damaged STG 16 blade and Hot Section Damage	Contract Req with Siemens 00368192.	Estimated return to service 6 to 8 weeks after contract is awarded.
	TM07	557-230	557-230	7LM2500 – PK – MDWG05	TM2500+ SAC	30 MW	25	Available		-	Due for Hot Section replacement.	
	TM08	557-242	557-242	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	0	Not Available	3-Dec-25	Damaged VSV Section 0 and Hot Section Damage	VSV repair Contract Request #374639 GE to supply Hot Section that will be available until November 2026. Contract 111385-TO#7.	14 weeks after VSV repair contract has been awarded.
	TM09	557-266	557-266	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	0	Not Available	8-Jan-25	Switchgear explosion + Hot Section Damage+bearing 4/5 replace	Sent out for Depot service. Contract 107284-TO#7.	Estimated return to service Jan 2027
	TM10	557-262	557-262	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	25	Available		-	Due for Hot Section replacement.	
Palo Seco	TM01	557-259	557-259	7LM2500 – PK – MDWG07	TM2500+ SAC	30 MW	0	Not Available	2-Sep-25	High Pressure Turbine section STG1&2 burned blades	GE to supply Hot Section that will be available until November 2026. Contract 111385-TO#7.	2 weeks after receiving the Hot section.
	TM02	557-121	557-121	7LM2500 – PK – MDWG05	TM2500+ SAC	30 MW	0	Not Available	6-Aug-26	Only Gas Operation: HPT 1st stage excessive corrosion Out of service due to Main Transformer	Transformer inspection Contract 110838-TO#15	Estimated return to service 6 weeks. Late October
	TM03	481-559	481-559	7LM2500 – PK – MDW	TM2500 BASE SAC	25 MW	0	Not Available	3-Dec-25	High Temperature Spread Hot Section Damage	Replace Hot Section Contract Req with Siemens 00368192.	Estimated return to service 6 to 8 weeks after contract is awarded.
	TM04	481-717	481-717	7LM2500 – PE – MGG16	TM2500 BASE SAC	26 MW	0	Not Available	13-Jun-25	VSV Failure, overall wear. Hot Section Damage	Will send to Depot for Mayor overhaul. Run Hours 43,186. Mayor dua at 50,000 hrs.Repair offer received. Soucing funds	Estimated return to service 16 to 20 weeks after contract is awarded.

SITE	Turbine Number	Current Status	Forced Outage Date	Repair Scope	Vendor	Proposals - Date	Estimated Repair Cost	Lead Time	Contract	Date Requested	Approval Status	Approval By	Approval Date	Funding Source	Comments
San Juan	TM01	Not Available	22-Jan-26	Isack arc repairs Bus Bars Cleaning and replace insulation - On going Replaced damaged breakers - Done Replace damaged cables - On going Perorm tests according to NEC standards. Include VLF Test. vsv repairs Perform Top Case removal of the Compressor Perform in-depth inspection of the Compressor Rotor, Compressor Stator, and Variable Stator Vane (VSV) system. Perform repairs on the VSV system.	Genera	Auxiliary Breaker failure, repair in progress.	\$	- 30 days	N/A	Internal work	N/A	N/A	N/A	Genera work force	
	TM03	Available Limited		Due for Hot Section replacement.		Estimated cost	\$3,850,000.00								Work with Hot Sections Suppliers for avalability
	TM04	Available Limited		Due for Hot Section replacement.		Estimated cost	\$3,850,000.00								Work with Hot Sections Suppliers for avalability
	TM05	Available		Due for Hot Section replacement.		Estimated cost	\$3,850,000.00								Work with Hot Sections Suppliers for avalability
	TM06	Not Available	17-Jun-26	Damaged STG 16 Compressor blades Remove Top Case cover and replace Stage 16 blades Exchange of One (1) LM2500+ SAC Hot Section Module with OEM hardware Swap Field Support Remove engine from enclosure, swap old with new Hot Section. Re-install engine in the enclosure	GESA or GE Siemens	Awaiting proposal SF262532095 March 31, 2026	\$2,500,000.00	14 days Subject to availability	368192	4/17/2026	Approved		6/29/2026		Waiting for P3A y FOMB
					GESA	OPP834 April 17, 2026	\$415,050.00	12 days							Offer used for Budget purpose
	TM07	Available		Due for Hot Section replacement, vsv repairs		Estimated cost	\$3,850,000.00								Work with Hot Sections Suppliers for avalability
	TM08	Not Available	3-Dec-26	Perform Top Case removal of the Compressor Perform in-depth inspection of the Compressor Rotor, Compressor Stator, and Variable Stator Vane (VSV) system. Perform repairs on the VSV system. Exchange of One (1) LM2500+ SAC Hot Section Module with OEM hardware Swap Field Support Remove engine from enclosure, swap old with new Hot Section. Re-install engine in the enclosure	GESA GE	PROPOSAL NO.: OPP1136 August 19, 2026 GEV Reference 172301 August 24, 2026	\$388,725.00 \$3,599,957.00	80 days Late November	374639 MSSA 111385-10#7	6/17/2026 8/26/2026	Review Approved	GEFCO			
					GESA	OPP834 April 17, 2026	\$415,050.00	12 days							Offer used for Budget purpose
	TM09	Not Available	8-Jan-26	Contractor shall supply, deliver, install, test, commission, and place into service a new medium-voltage metal-enclosed switchgear assembly to replace the existing TM09 San Juan Switchgear. The new equipment shall be a direct substitution that matches the original in all specifications and shall comply with all applicable UL standards and project requirements. On Site work - GT Removal and install in shipping container. Send to Service Center GT repairs at Service Center - Disassembly and repair components and reassemble. Final inspection, packing and preparation for shipment. On Site work - Installation	GESA	OPP697 June 18, 2026	\$500,000.00	16-20 weeks		9/9/2026	Pending	GEFCO			Contract request started. No vendor assigned yet
	TM10	Available		Due for Hot Section replacement.		Estimated cost	\$3,850,000.00								Unit Shipped out to 8/18/26 Work with Hot Sections Suppliers for avalability
Palo Seco	TM01	Not Available	2-Sep-26	Exchange of One (1) LM2500+ SAC Hot Section Module with OEM hardware Swap Field Support Remove engine from enclosure, swap old with new Hot Section. Re-install engine in the enclosure	GE	GEV Reference 172301 August 24, 2026	\$3,599,957.00	Late November	MSSA 111385-10#7	8/26/2026	Approved		8/31/2026		Offer used for Budget purpose
	TM02	Not Available	6-Aug-26	Trabajos de Conservación y Pruebas para Confirmar Integridad del Transformador MPT-Black #2 Hidro Gas, Central Palo Seco-Genera PR	Electricoop	Proposal dated August 27, 2026	\$67,800.00	15 days	MSSA 110838-10#15	8/31/2026	Approved		8/31/2026	NME	
	TM03	Not Available	3-Dec-26	Exchange of One (1) LM2500 BASE SAC Hot Section Module with OEM hardware Swap Field Support Remove engine from enclosure, swap old with new Hot Section. Re-install engine in the enclosure	Siemens	SF262532095 March 31, 2026	\$2,000,000.00	14 days Subject to availability	368192	46129	Approved		46202		Waiting for P3A y FOMB
	TM04	Not Available	13-Jun-26	On Site work - GT Removal and install in shipping container. Send to Service Center GT repairs at Service Center - Disassembly and repair components and reassemble. Final inspection, packing and preparation for shipment. On Site work - Installation	GESA	OPP1140 August 20, 2026	\$3,817,968.00	127 days plus shipping							Need to Surce funds and awaiting other offers

ATTACHMENT 5



CERTIFICATE OF GUARANTEE

Siemens Energy Inc. certifies that the scopes of work listed below and supplied to New Fortress Energy have fulfilled the necessary criteria as outlined in the respective proposals and General Terms and Conditions mutually agreed.

(1) TM2500+ HPC Top Case & 16th stage compressor blades replacement for their Unit GT2 (557-121).

{2) TM2500 Base HPC Top Case & 16th stage compressor blades for their Unit (481-717).

Signed for and on behalf of SIEMENS ENERGY INC

Brian
Watson

Digitally signed by Brian Watson
DN: cn=Brian Watson, c=US,
email=brianwatson@outlook.com
Date: 2024.05.02 16:35:33 -05'00'

Title.....Project Manager..... Date.....5/02/2024.....

ATTACHMENT 6



CERTIFICATE OF GUARANTEE

NEW FORTRESS ENERGY

Proposal	SF242230227
ESN	557 259
Model	TM2500 Plus SAC

Siemens Energy Inc. hereby certifies that the scope of work described below, supplied to New Fortress Energy, has fulfilled the applicable requirements set forth in Proposal SF242230227, NFE Purchase Order NPRL10241, and the mutually agreed General Terms and Conditions.

SCOPE OF WORK

(1) TM2500+ Hot Section Exchange - GT01

Signed for and on behalf of SIEMENS ENERGY INC.

Paz Patrick

Assinado digitalmente por Paz Patrick
DN: cn=Paz Patrick, c=DE,
o=Siemens,
email=patrick.paz@siemens-
energy.com
Data: 2024.05.17 16:22:59 -03'00'

Authorized Signature

May 17th 2024

Date