

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

NEPR

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IN RE:

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

CASE NO.: NEPR-MI-2021-0002

SUBJECT: Motion to Submit Monthly BESS
Progress Report in Compliance with Resolutions
and Orders Dated February 1, 2024, and April
23, 2024 (August 2026)

**MOTION TO SUBMIT MONTHLY BESS PROGRESS REPORT IN
COMPLIANCE WITH RESOLUTIONS AND ORDERS
DATED FEBRUARY 1, 2024, AND APRIL 23, 2024**

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 February 1, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) issued a Resolution and Order titled *Determination on GENERA's November 21 Motion Submitting Response in Compliance with the Resolution and Order Dated November 8, 2023, and Requesting a Time Extension to Provide the Detailed Scope of Work per Site* (“February 1st Order”). In the February 1st Order, the Energy Bureau approved the projects included in Attachment A therein and noted that Genera is required to present these approved projects to the Federal Emergency Management Agency (“FEMA”) and the Puerto Rico

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 and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) the sole entity authorized to represent PREPA before the Energy Bureau with respect to 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.

Central Office for Recovery, Reconstruction and Resiliency (“COR3”) to finalize their approval process.

2. Additionally, in the February 1st Order, the Energy Bureau ordered Genera to submit **monthly** reports on the progress of the interconnection studies to be undertaken by LUMA², as well as updates on the development status of the detailed Scope of Works (“SOW”) and the Battery Energy Storage System (“BESS”) Request for Proposals (“RFP”) (“Monthly Progress Report for the BESS Project”).

3. On April 23, 2024, the Energy Bureau issued a Resolution and Order reiterating to Genera the February 1st Order regarding the Monthly Progress Report for the BESS Project and, additionally, directed Genera to include in the report any updated information concerning the locations and MW quantities comprising the total of 430 MW of BESS projects.

4. In compliance with the February 1st Order and the April 23rd Resolution, Genera respectfully submits to the Energy Bureau its Monthly Progress Report for the BESS Project for the month of August 2026 as *Exhibit A* to this motion.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** Genera’s Monthly Progress Report for the BESS Project for the month of August 2026, submitted as Exhibit A to this Motion; and **deem** Genera to be in partial compliance with the February 1st Order and April 23rd Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 10th day of September 2026.

(Signatures appear on the following page.)

² LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA")

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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 and that we will send an electronic copy of this motion to alexis.rivera@prepa.pr.gov; nzayas@gmlex.net; rcruzfranqui@gmlex.net; mvalle@gmlex.net; margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com; emmanuel.porrogonzalez@us.dlapiper.com.

In San Juan, Puerto Rico, this 10th 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 A

Monthly Progress Report for the BESS Project

Docket Number: NEPR-MI-2021-0002

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

BESS Monthly Report

Cambalache Plant:

- In the North Slab, concrete placement was successfully completed. Six (6) out of the twelve (12) required structural modules have been delivered to the site and installation began on August 25.
- In the Center Slab, rebar mat installation progressed to approximately 68% complete by the end of August, with concrete placement anticipated to begin in September.
- In the South Slab, structural module installation reached 80% completion by the end of August. An additional scope has been identified involving the installation of supplemental battery support brackets to enhance structural support. The proposed solution will be submitted to Tesla for review and approval.
- Installation of the fire water piping and oily water piping systems was completed in the New Parking Area. The Hydrostatic testing required tie-ins, and backfilling activities were also completed.
- Works continues on the remaining piping systems included within the project scope.
- Construction coordination meetings are held every Tuesday.

Vega Baja Plant:

- During the month of August 2026, a total of 1,242.5 cubic yards of concrete were poured as detailed below:
 - 803 cubic yards – Modules N-7, N-8, N-9, and N-10 Mat Foundation.
 - 158 cubic yards – C-Walls U57 to U60 on Module N-3, U61 to U64 on Module N-3, U31 and U32 on Module N-7, and U35 and U36, on Module N-8.

- 11 cubic yards – Columns C35 to C42 on Module N-3 and columns C44 to C51 on Module N-2.
- 6 cubic yards – Beam from column C27 to C34 on Module N-4.
- 92 cubic yards – Elevated slab on Module N-4.
- 86.25 cubic yards – Elevated slab on Module N-5.
- 86.25 cubic yards – Elevated slab on Module N-6.
- Construction coordination meetings with the contractor are held every Tuesday.

Palo Seco Plant:

- The Task Order has been formally issued to Stantec, the A&E firm, authorizing the preparation of the RFP for the demolition of the Palo Seco warehouse. Upon discussions with the A&E firm in regards to the development of the scope of work for demolition, it was agreed to move the issuance of the RFP to Q4 -2206 instead of Q3- 2026.
- The Task Order for the 30% design is currently under negotiation with the A&E firm.
- Delivery of Tesla Medium Voltage Transformers is complete.
- Genera warehouse inventory relocation is currently underway. This activity is being managed by Genera Operations and Warehousing Staff.

Costa Sur Plant:

- Concrete pour for GSU slab was completed on August 14th, while concrete for the pedestal and dike walls was poured on August 24th.
- Construction of the retaining wall in the South and North Area is ongoing.
- The North Load Transfer Platform has been completed while work on the South Load Transfer Platform is ongoing.
- Modulus testing and CPT tests on both platform areas have been completed.
- Weekly construction coordination meetings with the contractor are held every Thursday.

Aguirre Plant:

- Backfilling, compaction, and material removal activities are ongoing.
- Drainage installation and backfilling around catch basins and manholes are ongoing.
- Grounding and duct bank installation is in progress.
- Fire protection excavations and piping installation started.
- The mobilization of Tesla equipment to start the assembly, oil filling and testing of the GSU is now scheduled for September 2026.
- The delivery of 206 Megapacks has been completed by Tesla.
- Construction coordination meetings with the contractor are held every Thursday.

Yabucoa Plant

- HUB's proposal for the relocation of the communication room was received and is currently under evaluation.
- Sheet piling and related punch list activities are completed.
- Earthwork activities are ongoing with approximately 21,500 cubic yard excavated to date.
- Construction coordination meetings with the contractor are held every Wednesday.

LUMA Interconnection Studies

- The Scope of Work (SOW) for the Palo Seco BESS Point of Interconnection (POI) have been finalized. Currently working on the logistics to issue an RFP in Q3 2026.
- The contractor at Cambalache is currently working on 90% design package and the contractor at Vega Baja submitted for review its 30% design package. After submission of the 30% design, the Vega Baja

contractor will start working on the 60% design package. LUMA's review of design development is ongoing.

- The contractor's proposal and project schedule for the Costa Sur BESS, Aguirre BESS, and Yabucoa BESS/Peakers projects is in the final stages of negotiation before being submitted for stakeholder's approval.
- Coordination meetings with LUMA are held every Wednesday and weekly meetings between LUMA, Genera and contractors are ongoing.

Permits

- The PUI permit (2025-656953-PUI-302372) for Vega Baja was issued on March 4, 2026.
- The PUI permit (2025-652964-PUI-301906) for Cambalache was issued on October 27, 2025.
- The PUI permit (2026-669561-PUI-302236) for Aguirre was issued on February 26, 2026.
- The PUI permit (2026-669313-PUI-302234) for Yabucoa was issued on April 21, 2026,
- The PUI permit (2026-669561-PUI-302236) for Costa Sur was issued on April 20, 2026
- The Fire Department Endorsement for all sites is in process. Fire Risk Alliance is preparing the Hazard Mitigation and Emergency Response reports for the BESS project.

Procurement

- The biweekly coordination meetings with LUMA and Tesla were completed. The Grid Forming MTRs for Cambalache and Vega Baja were agreed between LUMA, Genera and Tesla. The Grid Forming MTR narrative was shared with the Cambalache Contractor to begin SCADA controls development.

- The RFP for the POI for the Costa Sur Peakers, Palo Seco BESS, Dagua Peakers, and Jobos Peakers projects is still scheduled to be issued in Q3 2026.

Equipment Delivery Status

- MegaPacks

Site	Delivery Status
Cambalache	100%
Vega Baja	100%
Costa Sur	100%
Yabucoa	100%
Aguirre	100%
Palo Seco	0%

- Medium Voltage Transformers

Site	Delivery Status
Cambalache	100%
Vega Baja	100%
Costa Sur	100%
Yabucoa	100%
Aguirre	100%
Palo Seco	100%

- Palo Seco Batteries delivery will be completed on Q4 2026.

- Costa Sur GSU arrived at the San Juan port, and it is scheduled for delivery in September 2026.