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

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY PERMANENT RATE	**CASE NO.:** NEPR-MI-2020-0001 **SUBJECT**: Request for Information and scheduling of Virtual Technical Conference.

RESOLUTION AND ORDER

The Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") **ORDERS** LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, "LUMA") and Genera PR, LLC ("Genera") to appear at the Virtual Technical Conference to be held on **Monday, September 28, 2026 at 10:00 a.m.**, to clarify matters related to the proposed quarterly factors filed by LUMA on September 15, 2026. LUMA and Genera representatives shall be prepared to explain what is driving the proposed six-cent increase. This should include every component, how much each component contributes to the six cents, why those costs are increasing, and any significant changes from the previous quarter.

Additionally, LUMA and Genera are **ORDERED** to respond to the Request for Information attached to this Resolution and Order as **Attachment A on or before Tuesday, September 22, 2026 at 12:00 p.m.**

The Secretary of the Energy Bureau **SHALL** timely provide LUMA, and Genera with the appropriate link to access the Virtual Technical Conference. Genera shall obtain and provide the Puerto Rico Electric Power Authority's ("PREPA") responses to this RFI.

Failure to comply with this Resolution and Order may result in the imposition of sanctions pursuant to Article 6.36 of Act 57-2014.[1]

Be it notified and published.

Edison Avilés Deliz
Chairman

Ferdinand A. Ramos Soegaard
Associate Commissioner

Sylvia B. Ugarte Araujo
Associate Commissioner

Antonio Torres Miranda
Associate Commissioner

Omar M. Rodríguez González
Associate Commissioner

NEGOCIADO DE ENERGÍA DE PUERTO RICO
NEPR
JUNTA REGLAMENTADORA DE SERVICIO PÚBLICO

[1] *Puerto Rico Energy Transformation and RELIEF Act*, as amended ("Act 57-2014").

CERTIFICATION

I certify that the majority of the members of the Puerto Rico Energy Bureau agreed on September 18, 2026. I also certify that on September 18, 2026, I have proceeded with the filing of this Resolution and Order and was notified by email to RegulatoryPREBOrders@lumapr.com; yahaira.delarosa@us.dlapiper.com; margarita.mercado@us.dlapiper.com, katiuska.bolanos-lugo@us.dlapiper.com; kmercado@jrsp.pr.gov; wvera@jrsp.pr.gov; legal@genera-pr.com; regulatory@genera-pr.com; lrn@roman-negron.com.

I sign this in San Juan, Puerto Rico, today September 18, 2026.

Sonia Seda Gaztambide
Clerk

ATTACHMENT A

1. Have any errors or revisions been identified by Genera or LUMA that affect the FCA, PPCA, and FOS rates for October through December 2026 proposed by LUMA in LUMA's September 15, 2026, Motion and supporting documents?
    a. If "yes," please identify, quantify and explain each correction and revision to those rates that has been identified.
2. Has Genera experienced problems or delays in getting fuel delivered during June 2026 through August 2026? If so, please explain, providing specifics of fuel delivery issues that LUMA or Genera are experiencing.
3. Is Genera expecting problems or delays in fuel deliveries during the October 2026 through December 2026 period? If so, please explain, providing specifics of expected fuel delivery issues. Also, specify and explain any contingency plans to assure that sufficient fuel will be delivered to the system during those months to avoid having outages attributable to insufficient fuel availability.
4. Have Genera or PREPA received force majeure notifications from any fuel suppliers or fuel transporters in June 2026 through August 2026? If so, please identify and provide a copy of each such force majeure notification.
5. Have LUMA or PREPA received force majeure notifications from any purchased power suppliers from June 2026 through August 2026? If so, please identify and provide a copy of each such force majeure notification.
6. During the reconciliation months of June 2026 through August 2026:
    a. Were there any transmission system outages that prevented generation from being supplied to serve electric load?
    b. If the answer to part a is "yes" identify each transmission system outage in each month, June 2026, July 2026, and August 2026, that affected the system's ability to transmit power generated and purchased to serve electricity demand.
7. During the reconciliation months of June 2026, July 2026, and August 2026:
    a. Were any generating units unavailable due to unplanned or forced outages?
    b. If the answer to part a is "yes," identify each forced/unplanned outage in June 2026, July 2026, and August 2026 by generating unit, date, time, and duration. Also explain the cause of each such outage and identify, quantify, and explain how it affected fuel and purchased power costs for each month. Include supporting calculations.
    c. For the forced/unplanned outages identified in response to part b, does LUMA or Genera have any analysis, calculations, or estimates of the impact on monthly fuel costs and monthly purchased power costs related to those outages, including estimates of the amounts of fuel costs saved by not running the units that experienced the forced outages, and estimates of the additional costs for the replacement power? If not, explain why not.
    d. If the response to part c is "yes," please identify and provide the analyses, calculations, and estimates that LUMA and Genera have relating to the impact of those forced/unplanned outages on monthly fuel cost and monthly purchased power cost for June 2026, July 2026, and August 2026.
    e. For the forced/unplanned outages identified in responses to the above subparts, does LUMA or Genera have any analysis of the cause of those outages? If not, explain why not.
    f. If the response to part e is "yes," please identify and analyze the causes of each of those forced/unplanned outages.
8. During September 2026, have there been any unplanned or forced outages? If yes, identify each forced/unplanned outage by generating unit, date, time, and duration.
    a. Are the September 2026 forced/unplanned outages expected to extend beyond September 30, 2026 and into October 2026 or beyond? If so, explain fully.
    b. If the answer to part a is "yes," how did LUMA and Genera consider the continuing generating unit outages in projecting fuel and purchased power cost for October through December 2026?
9. In June 2026, July 2026, and August 2026, were any generating units run for system reliability reasons and/or because of system constraints outside of normal economic dispatch in which the highest variable cost units are called upon first to meet load? If

so, identify the days and hours in which non-economic dispatch occurred and explain the related reasons.

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

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

12. In June 2026, July 2026, and August 2026, were any new fuel supply contracts entered into for supply of natural gas or other fuel types? If yes, provide the following information:

a. A copy of the contract, including pricing, quantities, and delivery terms.
b. The names and job titles of the persons who negotiated the contract.
c. Whether the persons identified in response to part b are employed by affiliated entities or related parties, and, if so, an explanation of affiliated relationship.

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

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

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

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

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

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

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

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

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

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

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

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

a. Referring to the Energy Bureau's December 19, 2025 Resolution and Order: Is LUMA, PREPA or Genera aware of any ongoing disputes against suppliers of natural gas to the system?
b. Is the dispute with NFE about natural gas supply to the system identified in the Energy Bureau's December 19, 2025 Resolution and Order ongoing as of September 16, 2026?

c. If the response to part b is "no", when was it resolved? Please identify and provide the documentation containing the resolution of the dispute with NFE identified in the Energy Bureau's December 19, 2025 Resolution and Order.
d. If the response to part b is "yes" please identify, quantify and explain how LUMA has continued to reflect the deferral of the $55 million of disputed NFE natural gas costs. Also explain the status of the dispute.

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

NG Nominations, Back Up Fuel Use, Fuel Prices

22. For June 2026, July 2026, and August 2026, please provide the monthly and daily/day-ahead natural gas nominations submitted by Genera to Naturgy and to NFE, respectively, including all supporting workpapers, calculations, and load and unit-dispatch forecasts used to determine each nominated volume.
a. Identify the individual(s) or department responsible for preparing, reviewing, and approving each nomination, and describe the internal process and approval timeline followed.
b. For each month, state whether the nominated volumes were confirmed in full, confirmed in part, or rejected by Naturgy and/or NFE, and provide all related nomination confirmations, rejections, curtailment notices, or other correspondence exchanged with each supplier.
c. If any nominations were confirmed in part or rejected, explain in detail the reasons given by Naturgy and/or NFE, and quantify the volume (in MMBtu or other applicable unit) and dollar impact of the resulting shortfall in each month.

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

24. Were any natural gas nominations to Naturgy and/or NFE voluntarily reduced, capped, or withheld at Genera's own initiative during June, July, or August 2026 (e.g., due to Annual Contract Quantity or take-or-pay limitations, minimum-bill provisions, storage or regasification send-out capacity constraints, budgetary considerations, or any other internal reason)?
a. If so, identify each instance, the volume involved, the reason for the reduction, who made the decision, and any analysis performed of the expected impact on the need to burn ULSD and/or HFO as a result.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Additional RFIs for PREPA about impacts of drought on hydro generation and outages

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

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

45. Aguirre and EcoEléctrica outages.

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

46. AES coal-fueled generating plant outages.

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