

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

NEPR

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IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

Subject: Motion to Submit FY2025 Heat Rate and Emissions Workpapers and to Confirm Heat Rate Data in Compliance with Resolution and Order Issued September 8, 2026

**MOTION TO SUBMIT FY2025 HEAT RATE AND EMISSIONS WORKPAPERS AND
TO CONFIRM HEAT RATE DATA IN COMPLIANCE WITH RESOLUTION AND
ORDER ISSUED SEPTEMBER 8, 2026**

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 December 19, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order (*December 19th Resolution*) ordering Genera to submit the underlying data and supporting workpapers for certain Fiscal Year 2025 ("FY2025") performance metrics, including the heat rate and emissions metrics.

2. On January 27, 2026, Genera submitted its underlying data and supporting workpapers (*Genera's January 2026 Submission*).

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

3. On March 16, 2026, the Energy Bureau issued a Resolution and Order (*March 16th Resolution*) determining that *Genera's January 2026 Submission* did not fully meet the requirements of the *December 19th Resolution* and ordering Genera to resubmit the FY2025 supporting data and workpapers and to respond to the Requirements of Information included in Attachment A thereto.

4. On March 26, 2026, Genera filed a Motion in Compliance with Resolution and Order of March 16, 2026 and Request for Limited Extension as to Remaining Heat Rate Support (*March 26th Motion*).

5. On April 2, 2026, the Energy Bureau issued a Resolution and Order (*April 2nd Resolution*) establishing a new quarterly data reporting template for Genera, directing Genera to submit its quarterly performance metric submission separately from LUMA beginning with the FY2026 Q3 Report, and establishing certain requirements concerning the calculation and reporting of particular metrics.

6. On April 20, 2026, Genera filed its Motion to Submit Quarterly Report, Response to ROI No. 1 and to Comply with Resolution and Order Issued March 16, 2026, and Resolution and Order Issued April 2, 2026 (*April 20th Motion*), through which it submitted revised heat rate workpapers for October through December 2025 as Exhibit 3 and explained, by facility, the differences between the heat rate values previously reported and the recalculated values.

7. On July 20, 2026, Genera submitted its quarterly report for the April through June 2026 period and additional information (*July 20th Submission*).

8. On September 8, 2026, the Energy Bureau issued a Resolution and Order (*September 8th Resolution*) addressing outstanding issues with the FY2025 workpapers and with the data reported in Genera's quarterly reports for FY2025 and FY2026, and ordering Genera to

submit certain items within ten (10) business days and certain additional items within fifteen (15) business days of notification.

9. Through this Motion, Genera submits the items ordered to be filed within ten (10) business days of notification of the *September 8th Resolution*. Genera will address the items ordered to be filed within fifteen (15) business days in a separate motion on or before September 29, 2026, which will include the *Resumen Métricas* file conformed to the heat rate values confirmed herein.

I. FY2025 HEAT RATE WORKPAPERS

10. In compliance with the *September 8th Resolution*, Genera submits its complete heat rate workpapers for the period from July 2024 through June 2025, covering the *Average heat rate (system)* and *Average heat rate (by plant)* metrics. The workpapers are maintained on a quarterly basis and are submitted as Exhibits 1A through 1D, corresponding to the first through fourth quarters of FY2025.

11. Each workbook contains a separate tab for San Juan, Palo Seco, Aguirre, Costa Sur, Aguirre Combined Cycle, Cambalache, Mayaguez, the Peaker units and the Temporary Generation Units, together with a System tab. For each month, each facility tab sets forth by unit the fuel type, the fuel consumed in barrels, the heating value applied in Btu per barrel, the resulting Btu, the gross generation and the net generation in kWh, and the gross and net heat rates. The System tab aggregates those values by plant and by subgroup and derives the total system gross and net heat rates. The workbooks are submitted in native format with their formulas and calculations intact, so that the Energy Bureau may trace each reported metric from the unit level inputs to the system level result.

12. **Exhibits 1A** through **1D** include the Peaker units, with the heating values applied for each month of FY2025. Genera notes that the validation referenced in paragraph 18 of the *April 20th Motion* concerned the heating values for October through December 2025, which fall within FY2026 and are therefore outside the FY2025 reporting period covered by these workpapers.

II. FY2025 EMISSIONS AND EMISSIONS RATE WORKPAPERS

13. Genera submits its complete total emissions and emissions rate workpapers for the period from July 2024 through June 2025, following the same format and level of detail as Exhibit 2M of the *July 20th Submission*, as ordered in the *September 8th Resolution*.

14. The emissions workpapers are maintained on a calendar year basis. Accordingly, the FY2025 reporting period spans two workbooks: **Exhibit 2A** covers July through December 2024 and **Exhibit 2B** covers January through June 2025. Each workbook is submitted as maintained in the ordinary course and therefore also contains the remaining months of its respective calendar year.

15. The first tab of each workbook presents the monthly emissions by facility and the system totals in the format of Exhibit 2M. Each workbook contains calculation tabs for Costa Sur, San Juan, Aguirre, Palo Seco, Cambalache, Dagua, Yabucoa, Vega Baja, Jobos and Mayaguez, setting forth the monthly fuel inputs by facility, including the quantities of No. 6 and No. 2 fuel oil in gallons and natural gas in standard cubic feet, the weighted sulfur content by weight, and the emission factors applied. The Mensual tab presents the resulting monthly emissions at the system level in tons for each pollutant, and the Tasas tab presents the corresponding emission rates in pounds per MMBtu. The workbooks are submitted in native format with their formulas intact.

16. These workpapers address the deficiencies the Energy Bureau identified with respect to the workpapers submitted as Exhibit 1 to the *March 26th Motion*. They cover each month

of the FY2025 reporting period rather than a single month, and they present both the calculations performed at each facility and their aggregation into the system level total emissions and emissions rate values, so that the Energy Bureau may independently verify the reported metrics.

III. HEAT RATE DATA REPORTED IN THE JULY 20TH SUBMISSION

17. In the *September 8th Resolution*, the Energy Bureau noted that the heat rate values provided in the *July 20th Submission* had not been updated to match the revised values in Exhibit 3 of the *April 20th Motion*, and ordered Genera to confirm that the heat rate data submitted in the *July 20th Submission* are correct or to resubmit the correct data.

18. Genera has reviewed its FY2025 and FY2026 quarterly heat rate data. As a result of that review, Genera confirms that the correct heat rate values for October through December 2025 are those in Exhibit 3 to the April 20th Motion.

19. Genera acknowledges the difference between the values reported in the July 20th Submission and the revised values submitted as Exhibit 3 to the *April 20th Motion* for October through December 2025 with respect to the San Juan Combined Cycle, San Juan Steam, Palo Seco Steam , Mayagüez Gas and Cambalache Gas.

20. Accordingly, and consistent with the directives of the *September 8th Resolution* due within fifteen (15) business days of its notification, Genera will submit the *Resumen Métricas* file conformed to the heat rate values confirmed herein, together with its motion due on September 29, 2026.

21. The values reported for the remaining facilities for October through December 2025, including Aguirre Steam, Costa Sur Steam and the Aguirre Combined Cycle, are consistent with Exhibit 3 of the *April 20th Motion* and require no correction.

22. The submission and information contained in this motion and filed under this docket is made pursuant to Act 57-2014 and Regulation 9137, and is a distinct process, separate and independent of any other contractual filing made by Genera with similar information. For the avoidance of doubt, this filing, the information and annexes contained herein, do not constitute, replace, or modify any other information, filing or report submitted by Genera pursuant to the requirements of the LGA OMA.

23. The submissions under this docket, including this filing, do not confer any rights, obligations, oversight right, interpretations, or any other right to the Energy Bureau over the LGA OMA, including Section 7.1(c)(ii) and Section III of Annex II of the OMA, and shall not be construed as establishing any additional requirements or commitments.

24. Genera reiterates its commitment to comply with the directives of the Energy Bureau and to ensure that the values in the workpapers it provides align with its quarterly reports and contain sufficient underlying data, formulas, calculations, and supporting information for the Energy Bureau to independently verify the reported metrics.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the foregoing; **accept** the FY2025 heat rate workpapers submitted as **Exhibits 1A through 1D**, the FY2025 emissions and emissions rate workpapers submitted as **Exhibits 2A and 2B**; **take notice** of Genera's confirmation that the correct heat rate values for October through December 2025 are those in Exhibit 3 to the April 20th Motion; and **deem** Genera in compliance with the directives of the *September 8th Resolution* that are due within ten (10) business days of its notification.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of September 2026.

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CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion and Exhibits to alexis.rivera@prepa.pr.gov; mvalle@gmlex.net; margarita.mercado@us.dlapiper.com; nzayas@gmlex.net; rcruzfranqui@gmlex.net; Katiuska.bolanos-lugo@us.dlapiper.com; wvera@jrsp.pr.gov; yahaira.delarosa@us.dlapiper.com; jdiaz@ecija.com; jfr@sbgblaw.com; legal@genera-pr.com; regulatory@genera-pr.com.

In San Juan, Puerto Rico, this 22nd day of September 2026.

/s/ Ernesto Raúl Ramos Maldonado
Ernesto Raúl Ramos Maldonado

Exhibit 1A
FY2025 Heat Rate Workpapers, Q1 (July to September 2024)
(Native file submitted via email)

Exhibit 1B
FY2025 Heat Rate Workpapers, Q2 (October to December 2024)
(Native file submitted via email)

Exhibit 1C
FY2025 Heat Rate Workpapers, Q3 (January to March 2025)
(Native file submitted via email)

Exhibit 1D
FY2025 Heat Rate Workpapers, Q4 (April to June 2025)
(Native file submitted via email)

Exhibit 2A
Emissions and Emissions Rate Workpapers, Calendar Year 2024 (Formato 2M)
(Native file submitted via email)

Exhibit 2B
Emissions and Emissions Rate Workpapers, Calendar Year 2025 (Formato 2M)
(Native file submitted via email)