

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

NEPR

Received:

Oct 7, 2026

4:29 PM

IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

Subject: Motion to Clarify and Supplement
Motion in Compliance with Resolution and
Order of September 8, 2026

**MOTION TO CLARIFY AND SUPPLEMENT MOTION IN COMPLIANCE WITH
RESOLUTION AND ORDER OF SEPTEMBER 8, 2026**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, GENERA PR LLC ("Genera"), as operator of the Thermal Generation Facilities and as agent of the Puerto Rico Electric Power Authority ("PREPA"), through its counsels of record, and respectfully STATES and PRAYS as follows:

1. On September 29, 2026, Genera filed its Motion in Compliance with Resolution and Order of September 8, 2026, and Submitting Amended Q4 FY2026 Quarterly Report and Corrected Supporting Workpapers ("September 29 Motion"), together with Exhibits 1 through 6.

2. Through this Motion, Genera supplements the September 29 Motion with the fuel consumption, generation and heat rate workpapers for July through December 2025 and April through June 2026, submits an updated Amended Exhibit 1, identifies the changes to the data template that it recommends for the Energy Bureau's consideration, and clarifies the references to the supporting exhibits.

3. **Supplemental workpapers.** The Q1 and Q2 FY2026 workpapers referred to in paragraph 13 of the September 29 Motion are submitted as Exhibits 7 and 8, and updated Exhibit 2D, referred to in paragraph 16, is submitted as Exhibit 9. In Exhibit 7, the July 2025 Aguirre 2 block, which previously reflected August 2025 data, now reflects the applicable July 2025 fuel

consumption, heating values and generation; as a result, the July 2025 system and Aguirre Steam heat rates, which had been reported as pending, are 10,801.22 and 10,745.92 Btu/kWh, respectively. Exhibits 7, 8 and 9 also incorporate the heating value of the diesel consumed at Vieques and Culebra, using the fuel quantities and heating values recorded in those workpapers; this changes the gross system heat rate by less than 0.1 Btu/kWh in each month, except November 2025 (1.79 Btu/kWh). In Exhibit 8, the October 2025 San Juan 6 ULSD heat input is calculated as fuel consumed multiplied by heating value, instead of the fixed value used in Exhibit 3 of the April 20 Motion; as a result, the October 2025 gross heat rates of San Juan - Combined Cycle and of the system are 9,194.43 and 10,768.71 Btu/kWh, respectively. Table A shows the values of Table 1 of the September 29 Motion that are updated as a result.

4. For clarity, the April 2026 baseload correction described in paragraph 16 of the September 29 Motion retains the San Juan Plant subtotal and excludes the San Juan Combined Cycle and San Juan Steam component rows from that aggregation to avoid double counting. The correction to that aggregation does not change the system total.

Table A. Average heat rate (system), Btu/kWh: values of Table 1 of the September 29 Motion that are updated

Month	September 29 Motion	As clarified	Source
Jul 2025	Pending	10,801.22	FY2026 Q1 workpaper (Exhibit 7)
Aug 2025	10,882.08	10,882.12	FY2026 Q1 workpaper (Exhibit 7)
Sep 2025	10,743.22	10,743.30	FY2026 Q1 workpaper (Exhibit 7)
Oct 2025	10,767.33	10,768.71	FY2026 Q2 workpaper (Exhibit 8)
Nov 2025	10,989.86	10,991.65	April 20 Exhibit 3 and FY2026 Q2 workpaper (Exhibit 8)
Dec 2025	10,823.53	10,823.55	April 20 Exhibit 3 and FY2026 Q2 workpaper (Exhibit 8)

Month	September 29 Motion	As clarified	Source
May 2026	10,703.91	10,703.94	Updated Exhibit 2D (Exhibit 9)
Jun 2026	10,765.36	10,765.37	Updated Exhibit 2D (Exhibit 9)

5. **Emissions.** Amended Exhibit 1 also reports the total emissions and emissions rates for July through December 2025 as calculated in the calendar year 2025 emissions workpaper included in the September 22 Submission, which covers January through December 2025. Table B supplements Table 3 of the September 29 Motion with those months. The July through December 2025 emissions rates are not recalculated through this Motion.

Table B. Total Emissions (system), July–December 2025, tons

Month	Previously reported	Amended (September 22 workpapers)
Jul 2025	3,395.23	3,413.98
Aug 2025	3,065.48	3,064.39
Sep 2025	2,809.25	2,810.21
Oct 2025	4,080.77	4,080.26
Nov 2025	3,263.28	3,259.65
Dec 2025	3,206.22	3,144.07

6. **Carbon intensity.** Amended Exhibit 1 calculates the Carbon intensity of fossil generation for January through June 2026 using the CO₂e totals from Exhibit 6 and gross system generation less TMs generation, expressed in MWh. That generation denominator includes the Palo Seco MobilePacs. As a clarification of paragraph 20 of the September 29 Motion, the reported values are 0.79, 0.65, 0.74, 0.84, 0.77 and 0.82 tons of CO₂e per MWh, respectively, instead of 0.80, 0.66, 0.75, 0.85, 0.78 and 0.83 in Exhibit 6. Exhibit 6 remains the source of the CO₂e totals.

As a clarification of paragraph 31 of the September 29 Motion, the Methodology tab maintains the carbon-intensity methodology of the July 20 Submission, and the gross-generation basis is specified in the definition of the metric (Table C).

7. **Amended Exhibit 1.** The updated Amended Exhibit 1 replaces Exhibit 1 filed on September 29, 2026. Its Changes tab identifies the revisions; those made to the Definitions and Methodology tabs with respect to the July 20 Submission are summarized in Tables C and D. The Fuel Optimization note reflects the status of the Updated Fuel Optimization Plan pending before the Energy Bureau. System forced outages for July and August 2024 are reported as 32% and 23%, respectively, consistent with Genera's March 26, 2026 response to ROI 4 of the March 16 Resolution, completing previously blank entries.

8. **Recommended changes to the template.** Amended Exhibit 1 uses the data template established in the April 2 Resolution. Consistent with the April 2 Resolution and the September 8 Resolution, which direct Genera to include its recommended changes to the Definitions sheet for the Energy Bureau's consideration, the changes to the Definitions and Methodology tabs summarized in Tables C and D are submitted as recommendations for the Energy Bureau's consideration. For the same purpose, Genera recommends the following additions to the Generation tab, which Amended Exhibit 1 includes so that the reported system values can be reproduced from the supporting workpapers: (i) the Palo Seco MPs - Gas and TMs - Gas rows of Monthly thermal generation (by plant) and Average heat rate (by plant), beginning July 2024, together with the corresponding Definitions and Methodology rows; (ii) the H₂SO₄ rows of Total Emissions (system) and Emissions rates (system), which apply solely to Costa Sur and were already included in the reported total; (iii) the identification of the carbon monoxide rows of Total Emissions (system) and Emissions rates (system) as CO; and (iv) the name and unit of the OSHA

Fatality Rate row, reported as OSHA Fatalities (Number), consistent with the Definitions tab.

These recommendations do not modify the system values reported for the metrics of the template.

Table C. Recommended changes to the Definitions tab with respect to the July 20 Submission

Metric	Update
OSHA Recordable Incident Rate	Spanish definition specifies recordable injuries or illnesses ("lesión o enfermedad registrable")
OSHA Fatalities	Units changed from Rate (Tasa) to Number (Número)
Plant availability (system) and Forced outages factor (system)	Definitions refer to the percentage of the reporting period in which the generating units included in the system were available or, for forced outages, unavailable due to forced outages. "Factor" is added to the English name of Forced outages (system), and the Spanish name is "Factor de salidas forzadas (sistema)"; the Generation tab keeps the template name.
Equivalent Availability Factor for Baseload Units and for Peaking Units	Definitions describe availability at rated capacity, with planned and unplanned capacity limitations converted into equivalent derated hours based on their magnitude and duration; the formula is described in the Methodology tab. Reported EAF values are unchanged.
Cost of generation (system total, fuel, O&M and by plant type)	Definitions describe the applicable costs and the corresponding gross electrical generation during the reporting period, expressed in \$/kWh. The system total and by-plant-type definitions are the sum of the fuel and O&M components, and the O&M definition maintains the exclusion of the power purchase agreements with AES and EcoElectrica.
Monthly thermal generation (system and by plant)	Definitions refer to gross generation; GWh unit added for the system metric
Average heat rate (system and by plant)	Definitions specify that, beginning July 2024, the heat rate is calculated as fuel consumption (Btu) divided by gross generation (kWh) of the same units; Spanish name corrected to "Razón de calor promedio"
Palo Seco MobilePacs (MPs) and Temporary Mobile Units (TMs)	Definitions added, identifying their separate rows and the metrics in which they are included or excluded

Metric	Update
Total Emissions (system) and Emissions rates (system)	Definitions refer to carbon monoxide (CO) rather than carbon dioxide (CO ₂), in English and Spanish; the Spanish names identify CO and no longer include "HG"
Number of Consent Decrees Violations	Definition refers to violations of the provisions of the consent decrees during the month; Spanish name and definition aligned
Carbon intensity of fossil generation	English and Spanish definitions identify tons of CO ₂ e per MWh of gross generation of the units included in the emissions inventory, consistent with the numerator and generation basis used in the reported calculation.

Table D. Recommended changes to the Methodology tab with respect to the July 20 Submission

Metric	Update
Cost of generation (system total, fuel, O&M and by plant type)	Methodology rows added. The fuel component is energy consumption (MMBtu) multiplied by fuel cost (\$/MMBtu), divided by the corresponding gross generation (kWh); the O&M component is the applicable O&M costs, excluding purchased power costs, divided by the corresponding gross generation; the system total and by-plant-type values are the sum of the fuel and O&M components, in \$/kWh.
OSHA Recordable Incident Rate, OSHA DART Rate, OSHA Severity Rate and OSHA Fatalities	Methodologies updated to reflect the applicable case-, day-, and hours-worked-based calculations; OSHA Fatalities is described as a monthly count.
Monthly thermal generation (system and by plant) and Average heat rate (system and by plant)	Methodology expanded to describe the gross-generation basis, treatment of Palo Seco MobilePacs and TMs in system values and the applicable quarterly workpapers as the supporting data source, and the production records as the data source for the Vieques and Culebra generation by plant for July 2024 through December 2025.
Palo Seco MobilePacs (MPs), Temporary Mobile Units (TMs) and MMBTU consumed	Methodology rows added.
Total Emissions (system)	Methodology identifies the seven pollutants included in the total, including H ₂ SO ₄ solely for Costa Sur.

Metric	Update
Emissions rates (system)	Methodology specifies that rates are reported for the same seven pollutants included in Total Emissions (system), including H2SO4 solely for Costa Sur.

9. **Exhibit references.** Exhibits 2 through 5 are the Q1 through Q4 FY2025 heat rate workpapers filed with the September 29 Motion. These FY2025 heat rate workpapers supersede the corresponding workpapers of the September 22 Submission. Accordingly, the corrected Q3 and Q4 FY2025 workpapers referred to as Exhibit 3 in paragraph 11 and Table 1 of the September 29 Motion are Exhibits 4 and 5, respectively. Likewise, the Q3 FY2026 workpaper referred to as part of Exhibit 4 in paragraph 15 and Table 1 of the September 29 Motion is the workpaper filed as Exhibit 2E on April 20, 2026. The January and April 2025 emissions rates described in paragraph 12 use the emissions in Exhibit 2B of the September 22 Submission and the heat input in Exhibits 4 and 5, excluding TMs and the Vieques and Culebra diesel units; no separate emissions workpaper was submitted as Exhibit 5.

10. The calendar-year 2024 and 2025 emissions workpapers filed as Exhibits 2A and 2B on September 22, 2026, and the Q3 FY2026 heat rate workpaper filed as Exhibit 2E on April 20, 2026, remain supporting documents of record and are incorporated by reference, subject to the specific corrections identified in the September 29 Motion and this Motion. The 2026 emissions workpaper filed as Exhibit 6 supersedes Exhibits 2J through 2M of the July 20 Submission referred to in paragraph 17 of the September 29 Motion and remains the source inventory of the CO₂e totals used in the carbon-intensity calculation described above.

11. Genera submits the following exhibits with this Motion:

Exhibit 1:	Updated Amended Q4 FY2026 Quarterly Report (Resumen Métricas)
Exhibit 7:	Q1_Fuel Consumption, Generation, & Heat Rates_FY 25-26
Exhibit 8:	Q2_Fuel Consumption, Generation, & Heat Rates_FY 25-26
Exhibit 9:	Q4_Fuel Consumption, Generation, & Heat Rates_FY 25-26 (Updated Exhibit 2D)

12. Exhibits 2 through 6 were submitted with the September 29 Motion. Exhibits 2 through 5 remain unchanged. Exhibit 6 remains the filed emissions inventory and the source of the CO2e totals used in the carbon-intensity calculation described above.

13. These clarifications do not modify the relief requested in the September 29 Motion, other than to conform the exhibits referenced therein to those identified in this Motion and to identify the recommended changes to the data template described above. Paragraphs 36 and 37 of the September 29 Motion apply equally to this Motion. The recommended changes concern only the quarterly reporting template in this docket and do not modify or interpret the performance metrics or any other provision of the LGA OMA, including Section 7.1(c)(ii) and Section III of Annex II.

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the foregoing; **deem** the September 29 Motion clarified and supplemented as set forth herein; **accept** the updated Amended Exhibit 1 in substitution of Exhibit 1 submitted on September 29, 2026; accept Exhibits 7 and 8 as supplemental supporting exhibits and Exhibit 9 in substitution of Exhibit 2D of the July 20 Submission; **consider** the recommended changes to the data template identified in this Motion; and **grant** the relief requested in the September 29 Motion, as clarified herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of October 2026.

[Signature page follows.]

ECIJA SBGB

PO Box 363068

San Juan, Puerto Rico 00936

Tel. (787) 300.3200

Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo

Jorge Fernández-Reboredo

jfernandez@ecija.com

RUA Núm. 9,669

/s/ José Javier Díaz Alonso

José Javier Díaz Alonso

jdiaz@ecija.com

RUA Núm. 21,718

/s/ Ernesto Raúl Ramos Maldonado

Ernesto Raúl Ramos Maldonado

eramos@ecija.com

RUA Núm. 23,882

CERTIFICATE OF SERVICE

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this Motion and its Exhibits to alexis.rivera@prepa.pr.gov; mvalle@gmlex.net; nzayas@gmlex.net; rcruzfranqui@gmlex.net; margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com; katiuska.bolanos-lugo@us.dlapiper.com; and wvera@jrsp.pr.gov.

In San Juan, Puerto Rico, this 7th day of October 2026.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

/s/ Ernesto Raúl Ramos Maldonado
Ernesto Raúl Ramos Maldonado

Exhibit 1

Updated Amended Q4 FY2026 Quarterly Report (Resumen Métricas)
(Native file submitted via email)

Exhibit 7

Q1_Fuel Consumption, Generation, & Heat Rates_FY 25-26
(Native file submitted via email)

Exhibit 8

Q2_Fuel Consumption, Generation, & Heat Rates_FY 25-26
(Native file submitted via email)

Exhibit 9

Q4_Fuel Consumption, Generation, & Heat Rates_FY 25-26 (Updated Exhibit 2D)
(Native file submitted via email)