NEPR

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

IN RE: MANEJO DEL MANTENIMIENTO Y REPARACIONES DE LAS UNIDADES DE GENERACIÓN UTILIZADAS POR LA AUTORIDAD DE ENERGÍA ELÉCTRICA DE PUERTO RICO PARA SUPLIR SERVICIO ELÉCTRICO	**CASE NO.:** NEPR-MI-2021-0014 **SUBJECT:** Motion to Submit Supplemental Report to the Q4 Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for Fiscal Year 2026 in Compliance with the Resolution and Order Dated September 18, 2026, Request for Extension of Time, and Request for Confidential Treatment.

MOTION TO SUBMIT SUPPLEMENTAL REPORT TO THE Q4 QUARTERLY REPORT ON CONSUMABLES, SPARE PARTS, AND CAPITAL SPARE PARTS FOR FISCAL YEAR 2026 IN COMPLIANCE WITH THE RESOLUTION AND ORDER DATED SEPTEMBER 18, 2026, REQUEST FOR EXTENSION OF TIME, AND REQUEST FOR CONFIDENTIAL TREATMENT

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 June 16, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("June 16th Resolution"), whereby it established Docket No. NEPR-MI-2021-0014 to remain informed about the operating state of the Electric Power System and for filing of material related to the maintenance and repair of PREPA's generation fleet. The Energy Bureau noted the obligations of Genera pursuant to Section 4.2 of the

[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 (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.

LGA OMA to report on the available inventory of Consumables, Spare Parts, and Capital Spare Parts for each Legacy Generation Asset which could be used for offsetting other costs and expenses.[2] Additionally, in this docket, the Energy Bureau required Genera to file its June 1, 2023, Recommendation Letter and any future recommendations mandated by Section 4.2(j) of the LGA OMA, following the same submission timelines specified in that section.

2. On December 12, 2023, Genera filed a document titled *Motion to Submit Amended Response to Resolution and Order Dated November 29, 2023* ("December 12th Motion"), through which Genera submitted a revised assessment of Consumables, Spare Parts and Capital Spare Parts, pursuant to the Energy Bureau's November 29th Resolution.

3. On February 26, 2024, the Energy Bureau issued a Resolution and Order titled *Determination on GENERA's Proposed Consumables, Spare Parts, and Capital Spare Parts Listing* ("February 26th Resolution"). In the February 26th Resolution, the Energy Bureau informed that they had found that Genera satisfactorily reflected the Energy Bureau's direction, subject to certain reporting requirements listed in Attachment A to the February 26th Resolution.

4. The Energy Bureau, through the February 26th Resolution, approved the final version of the revised assessment of Consumables, Spare Parts, and Capital Spare Parts subject to the Quarterly Reporting Requirements established in Attachment *A* of the February 26th Resolution, and ordered Genera to file the foregoing Quarterly Reports within 45 days after the end of each quarter.

5. On August 14, 2026, Genera submitted its Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for the Fourth Quarter of Fiscal Year 2026 ("August 14 Motion"),

[2] *See*, Section 4.2 (j) of the LGA OMA.

covering the period from April 1 through June 30, 2026, and carrying forward the updates for the first three quarters of Fiscal Year 2026.

6. On September 18, 2026, the Energy Bureau issued a Resolution and Order ("September 18 Order"), in which it reviewed the August 14 Motion and determined that, although Genera submitted the required report, the information provided did not permit full verification of substantive compliance with the monitoring, measurement, and explanation requirements established in the February 26th Resolution.

7. Through the September 18 Order, the Energy Bureau ordered Genera to file, within twenty (20) calendar days, a supplemental report addressing twelve (12) requirements of information (the "Requirements"), and ordered that Genera permanently incorporate the Requirements in its quarterly reports.

8. In compliance with the September 18 Order, Genera respectfully submits, as Exhibit A to this Motion, the *Supplemental Report to the Q4 Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for Fiscal Year 2026* ("Supplemental Q4 Report"), together with Exhibits 1 through 6 referenced therein. The Supplemental Q4 Report responds to Requirements 3, 5, 6, 7, and 8.

9. The outstanding responses require the integration, reconciliation, and validation of information derived from multiple technical, operational, maintenance, procurement, and financial sources. Completing the responses also requires ensuring that the supporting data, explanations, schedules, and forecasts are accurate, internally consistent, and responsive to the specific requirements set forth in the September 18 Order. This review is being conducted in coordination with Genera personnel who remain responsible for supporting the ongoing operation and maintenance of the generation fleet. The requested extension will allow Genera to complete the

validation and reconciliation process and submit a supplemental report that is accurate, internally consistent, and fully supported by the underlying records.

10. Accordingly, Genera respectfully requests an additional twenty (20) calendar days, until October 28, 2026, to complete and submit the outstanding supplemental information. Genera is submitting the validated information and supporting exhibits presently available so that the Energy Bureau may begin its review while the remaining analyses and reconciliations are completed.

11. Exhibits 4, 5, and 6 contain detailed engineering, operational, and vulnerability information about the Legacy Generation Assets and their interconnection with the electric system, including root cause analyses of equipment failures, condition and severity findings for specific equipment, system operating conditions discussed with LUMA, and fuel inventory and delivery information of third-party suppliers. This information constitutes Critical Energy Infrastructure Information under 6 U.S.C. §§ 671-674 and 18 C.F.R. § 388.113, and includes commercially sensitive and proprietary information of third parties. Pursuant to Section 6.15 of Act 57-2014, Section 1.15 of Regulation 8543, and the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, Genera respectfully requests that Exhibits 4, 5, and 6 be kept confidential and under seal. Genera will file its memorandum of law in support of this request within ten (10) days.

12. Genera assures the Energy Bureau that this request is made in good faith and is not intended to interfere with the Energy Bureau's regulatory oversight or to evade or delay its regulatory obligations. Rather, this request reflects Genera's commitment to complying responsibly with the Energy Bureau's directives and providing accurate and reliable information.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the

above for all purposes; **accept** the Supplemental Q4 Report submitted as Exhibit A herein, together with Exhibits 1 through 6; **deem** Genera in compliance with the September 18 Order with respect to the information submitted herein; **grant** Genera an extension of twenty (20) calendar days, until October 28, 2026, to submit the remaining information requested in the September 18 Order; and **grant** confidential treatment to Exhibits 4, 5, and 6 and maintain them under seal.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of October 2026.

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 the following counsel of record: alexis.rivera@prepa.pr.gov; mvalle@gmlex.net; nzayas@gmlex.net; rcruzfranqui@gmlex.net; margarita.mercado@us.dlapiper.com; katiuska.bolanos-lugo@us.dlapiper.com; karenortiz@aes.com; elias.sostre@aes.com; carlos.reyes@ecoelectrica.com.

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Exhibit A

Responses to September 18th RFI

Docket Number: NEPR-MI-2021-0014
In Re: Maintenance and Repair Management of the Generation Units of the Puerto Rico Electric Power Authority
Re: Requirement of Information regarding Motion to Submit Quarterly Report on Consumables, Spare Parts, and Capital Spare Parts for the Fourth Quarter of Fiscal Year 2026

3. A monthly and quarterly breakdown, for each generating unit, of EAF, FOF, EOF, POF, MOF, and EFOR, each defined in accordance with IEEE Std 762 and NERC GADS conventions and accompanied by the period hours, service hours, planned, maintenance, and forced outage hours, and equivalent derated hours used to compute it, together with nameplate capacity, available capacity, and capacity limitations (including the cause, magnitude in MW, start date, and expected end date of each limitation). Genera shall explain every material variance and reconcile the unit-level totals with the fleet-wide aggregate indicators. The unit-level data shall include the peaking and temporary generation units operated by Genera, and EFOR shall not be presented as an additive component of period hours.

Response:

Exhibit 1 contains, for each generating unit operated by Genera, including the peaking and temporary generation units, the monthly period hours, available hours, service hours, reserve shutdown hours, forced, planned, and maintenance outage hours, and equivalent unplanned derated hours for Fiscal Year 2026; the EAF, FOF, POF, MOF, EOF, and EFOR computed from those hours; and the nameplate, tested (APT), and available capacity of each unit. Exhibit 1 also presents the fiscal-year totals by unit, plant, and fleet. In Exhibit 1, EFOR is presented as a rate and is not included among the components that add to period hours. Exhibit 2 contains the fleet-wide EAF, POF, MOF, FOF, and EFOR by month for Fiscal Year 2026; the fleet-wide

EAF, POF, MOF, FOF, and EOF by month for January through June 2026; and the available capacity of Genera and of the system.

5. A revised version of Attachment 5 that, for every failure or outage event, identifies the root cause; the corrective action taken; preventive action; scheduled and actual completion dates; and whether the duration of the event was affected by the availability or unavailability of Consumables, Spare Parts, and Capital Spare Parts, as required by Item 5 of Section I of Attachment A. If the analysis has not been completed, Genera shall provide a date certain for its completion. For every unit with two or more events attributable to the same system or component during Fiscal Year 2026, Genera shall provide the root cause analysis and describe the changes made to its maintenance program as a result.

Response:

Exhibit 3 is the revised Attachment 5 for the fourth quarter of Fiscal Year 2026 (April 1 through June 30, 2026). For each forced outage event, it identifies the unit, the cause, the dates and times the unit went out of and returned to service, the duration, the corrective action taken, and the root cause analysis document or, where no separate analysis was prepared, the explanation. Exhibit 4 contains the root cause analysis documents referenced in Exhibit 3.

6. Regarding the management of obsolete parts under Section C3(a)(i): the status of the disposal documentation; required approvals; disposal method; safety or environmental risks; and a schedule plan, with milestones and dates, to complete the process. Genera shall also explain its statement that no approvals from PREPA, the Energy Bureau, or P3A are pending, considering its prior statements that final disposition was awaiting PREB and P3A authorization and identify each approval it understands to be required and the entity from which it is required.

Response:

Genera is working with P3A to establish a movable asset disposition SOP. The draft document was provided to P3A for their review and approval and is based on the principles established on PREPA's enabling act and the Regulations PREPA had in place governing these matters. In parallel, Genera is holding meetings with PREPA personnel regarding inventory management and administration to move these efforts forward.

7. Regarding Section Cl3:6 Genera shall include contemporaneous documentation supporting its efforts for the approval of the Unit Maintenance Plan, including the date on which each version of the plan was submitted to LUMA, LUMA's written comments or objections, the records of the monthly coordination meetings, and the specific outages that remain unresolved, and, if it cannot identify a date, explain why and propose a mechanism and schedule for resolving the outstanding matters.

Response:

Genera has identified the following versions of the Unit Maintenance Plan for Boilers and Turbo-Generators: the version dated December 23, 2025, and the revision of August 4, 2026 attached to the Q4 Report.

Exhibit 5 contains the notes of the weekly LUMA–Genera coordination meetings held from April 2 through May 28, 2026, issued by LUMA System Operations.

8. A description of the maintenance program applied to each of the main generating units (San Juan Units 5, 6, 7, and 9; Costa Sur Units 5 and 6; Aguirre Units 1 and 2 and the Aguirre Combined Cycle STAG 1 ; Palo Seco Units 3 and 4; and the Cambalache and Mayagüiez units), showing for Fiscal Year 2026 the preventive maintenance work orders scheduled and completed, the preventive and corrective maintenance backlog expressed in work orders and labor hours, the ratio of corrective to preventive work, and the condition-monitoring findings (vibration, infrared thermography, ultrasound, and boiler tube surveys) that were converted into work orders. Genera shall explain how this information is used to adjust outage scopes, the Unit Maintenance Plan, and the inventory of Spare Parts and Capital Spare Parts.

Response:

Exhibit 6 contains the following Fiscal Year 2026 records for each plant: the preventive maintenance work orders scheduled, with their due date, status, and completion date; the corrective work orders generated, with their entry date, description, status, and closing date; and the condition-assessment reports for vibration analysis, infrared thermography, and lubricating-oil analysis, which identify the severity of each finding and, where recorded, the associated work request or work order.

Exhibit 1

KPIs FY 25-26 Spare Parts Report
Submitted via email in native Excel format.

Exhibit 2

Spare Parts Quarterly Report
Submitted via email in native Excel format.

Exhibit 3

Revised Attachment 5

Submitted via email in native Excel format.

Exhibit 4
RCA
CONFIDENTIAL – FILED UNDER SEAL

Exhibit 5

LUMA-Genera Coordination Meeting Notes Apr-May 2026

CONFIDENTIAL – FILED UNDER SEAL

Exhibit 6

Maintenance Program and Condition Monitoring

CONFIDENTIAL – FILED UNDER SEAL