

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

NEPR

Received:

Oct 23, 2026

10:02 PM

IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY'S PERMANENT RATE

Case No.: NEPR-MI-2020-0001

Motion in Compliance with Resolution and Order of
September 25, 2026, and Responding to Additional
Questions of Fourth Request for Information

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF SEPTEMBER 25,
2026 AND RESPONDING TO ADDITIONAL QUESTIONS OF FOURTH REQUEST
FOR INFORMATION**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW, GENERA PR, LLC (“Genera”), through its undersigned counsel and,
very respectfully, STATES and PRAYS as follows:

1. On September 25, 2026, the Puerto Rico Energy Bureau (“Energy Bureau” or “PREB”) issued a *Resolution and Order* in the above captioned proceeding (the “September 25 Resolution”), through which it issued a *Fourth Request for Information* (“Fourth RFI”) concerning, among other matters, the natural gas supply interruption at San Juan and the fuel cost forecasts underlying the proposed FCA, PPCA, and FOS factors for October through December 2026.

2. Through the *September 25 Resolution*, the Energy Bureau ordered Genera PR LLC (“Genera”), LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”), and the Puerto Rico Electric Power Authority (“PREPA”) to submit written responses to the Fourth RFI. Attachment A to the *September 25 Resolution* separately identifies the questions directed to each entity, with Part A containing the questions directed to Genera.

3. The *September 25 Resolution* further directed the parties to supplement their responses as additional information became available. In particular, the Energy Bureau

characterized the *Fourth RFI* as being of a continuing nature and directed Genera, LUMA, and PREPA to supplement their responses, without further order, upon the occurrence of the events specified therein and as new responsive information becomes available.

4. On October 15, 2026, Genera filed a *Motion in Partial Compliance with Resolution and Order of September 25, 2026 and to Respond to Fourth Request for Information* (“October 15 Motion”). Through that filing, Genera submitted, as Exhibit A thereto, its responses to most of the questions directed to Genera in the *Fourth RFI*, together with the supporting information and documentation then available.

5. As explained in the *October 15 Motion*, despite Genera’s diligent efforts to compile and review the information necessary to respond to the *Fourth RFI*, Genera was unable at that time to complete its responses to Questions 4.1(b), 4.1(c), 4.1(f), 4.3(a), 4.3(b), 4.3(c), 4.5, 4.6, 4.11(c), and 4.13 through 4.16. Genera therefore requested a brief extension, until October 23, 2026, to complete and submit its responses to those remaining questions.

6. Since the filing of the *October 15 Motion*, Genera’s Operations and Compliance personnel have continued working to compile, review, and corroborate the information necessary to respond to the outstanding questions. Genera has made significant progress and is in a position to provide its responses to all the remaining questions of the *Fourth RFI*, except for RFI 4.11(e).

7. Accordingly, in further compliance with the *September 25 Resolution* and supplementing the responses submitted through the *October 15 Motion*, Genera hereby submits, as **Exhibit A** to this Motion, its responses to the remaining questions of the *Fourth RFI*, except for the response to RFI 4.11(e). Genera respectfully requests an extension of three (3) business days, until October 28, 2026, to submit its response to RFI 4.11(e).

8. The responses submitted through this Motion should be read together with the responses and supporting documentation previously submitted as Exhibit A to the *October 15 Motion*.

9. Genera further acknowledges the Energy Bureau's directive that the Fourth RFI is of a continuing nature and will continue to supplement its responses, without further order, as required by the *September 25 Resolution* upon the occurrence of any of the events identified therein or as additional responsive information becomes available.

10. Finally, the exhibits and attachments to the Genera Responses contain confidential and protected information. Accordingly, Genera requests the exhibits and attachments be kept confidential pursuant to PREB's Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended on September 21, 2016. Through a separate filing, within the next ten (10) days, as set forth in Section A.2 of the PREB's policy on Management of Confidential Information, Genera will present a memorandum of law in support of its request to treat as confidential, and to protect as such, these exhibits and attachments.

WHEREFORE, Genera respectfully requests that the Energy Bureau TAKE NOTICE of the foregoing; RECEIVE AND ACCEPT Genera's responses to the additional questions of the Fourth Request for Information attached hereto as Exhibit A, together with the supporting information and documentation identified therein; DEEM GENERA IN PARTIAL COMPLIANCE with the September 25 Resolution's requirement to submit its responses to the Fourth RFI, and grant an extension of three (3) business days to present the response to RFI 4.11(e).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of October, 2026.

It is hereby certified that this Motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case: RegulatoryPREBOrders@lumapr.com;

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s/Luis R. Román Negrón

Luis R. Román Negrón

RUA 14,265

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Exhibit A

Docket Number: NEPR-MI-2020-0001

In Re: Puerto Rico Electric Power Authority Permanent Rate

Re: Fourth Request for Information

A.1 – Forecast Underlying the Proposed October–December 2026 Factors

The Fuel Budget Report forecasts, for October, November and December 2026, LNG of 9,049,230, 7,655,311 and 7,826,574 MMBtu (\$87,921,414, \$75,479,074 and \$81,397,937); ULSD of 1,740,000 MMBtu in each month (\$59,529,000, \$57,279,000 and \$54,933,000); HFO of 4,410,000 MMBtu in each month (\$83,034,000, \$79,891,000 and \$77,154,000); and Total Fuel Purchase Cost of \$230,484,413.76, \$212,649,074.09 and \$213,484,936.90. Attachment 3 FCA projects total fuel costs of \$196,982,605.76, \$189,272,913.71 and \$184,887,981.25 for the same months, projects no diesel for the "TM Generators" and "Palo Seco Mobile Packs" in any month, and projects diesel at San Juan Combined Cycle Units 5 and 6 of 15,298, 14,974 and 15,101 barrels.

4.1 Concerning the two forecasts:

b. Reconcile the two forecasts, by month and by fuel type, in quantity (MMBtu and barrels) and dollars, explaining each difference. State whether the Fuel Budget Report reflects fuel purchases (including replenishment of storage tanks to the 90% level described in Genera's response to First RFI item 29) rather than fuel consumption, and if so, quantify the inventory build or draw assumed in each month.

Response:

The Fuel Budget Report and Attachment 3 FCA are prepared on different basis and therefore are not directly comparable on a one-to-one basis and therefore cannot be reconciled. The Fuel Budget Report forecasts fuel purchases including replenishment of storage tanks, while Attachment 3 FCA forecasts fuel consumption for generation. Genera's response to First RFI item 29 explains that liquid-fuel purchases are based on available tank capacity and the quantities required to maintain adequate inventory levels, rather than forecast consumption by individual generating units.

- c. Explain why the ULSD forecast in the Fuel Budget Report is a constant 1,740,000 MMBtu (approximately 300,000 barrels) in each month while Attachment 3 FCA projects approximately 751,000 MMBtu of diesel for October 2026. State whether the Fuel Budget Report already anticipates diesel burn at the San Juan and Palo Seco Delivery Points during periods in which natural gas is not made available, and if so, quantify it by plant and month.

Response:

The Fuel Budget Report contains a monthly ULSD purchase allowance of 1,740,000 MMBtu, or approximately 300,000 barrels using 5.8 MMBtu/barrel. As explained in Genera's response to the First RFI item 29, liquid-fuel purchases are based on, among other factors, available tank capacity and the quantities required to maintain adequate inventory levels, including expected consumption.

Accordingly, the Fuel Budget Report does not separately quantify anticipated diesel burn associated with periods in which natural gas may be unavailable at the San Juan and Palo Seco Delivery Points, nor does it allocate such burn by plant and month. Rather, the ULSD allowance is presented on an aggregate purchase basis.

- f. State, by month and Delivery Point, the natural gas supply assumption, the fuel price forecast and the unit availability and scheduled maintenance assumptions that Genera provided to LUMA on September 9, 2026, and state whether Genera has notified LUMA of any change to those assumptions since September 16, 2026. If not, explain why not.

Response:

On September 9, 2026, Genera provided LUMA with its Fuel Prices Forecast for the October through December 2026 period, together with certain fuel availability assumptions by Delivery Point.

Regarding natural gas supply, Genera provided the following assumptions, applicable to the forecast period unless otherwise indicated:

- **Costa Sur / Naturgy:** Fuel availability was assumed to range from approximately 100% to 75% natural gas.
- **San Juan Units 5 and 6 / NFE:** Approximately 100% and 95% natural gas.
- **Palo Seco TM2500 Units / NFE:** Approximately 100% and 95% natural gas.
- **San Juan TM2500 Units / NFE:** Approximately 100% and 95% natural gas.

Regarding fuel prices, please see Exhibit 1 which contains the forecast for October, November, and December 2026 that Genera sent to LUMA.

The Fuel Prices Forecast was based on commodity-market index pricing data available as of September 9, 2026. Genera also advised LUMA that commodity prices, including Fuel Oil No. 6, ULSD, and natural gas, are subject to market volatility, geopolitical developments, and international economic conditions and that the forecast therefore represented a snapshot of market conditions as of that date.

Genera did not provide LUMA with separate unit availability or scheduled maintenance assumptions as part of the September 9, 2026 transmittal. In particular, Genera has not provided a scheduled maintenance forecast because there is currently no final maintenance schedule approved by both Genera and LUMA.

A.2 – Take-or-Pay Payments Under the GSA and the SJ 5&6 Agreement

The Fuel Purchases Reports for June, July and August 2026 invoice natural gas for San Juan Units 5 and 6 on the "Nominated Qty. to NFE" of 2,138,000.00, 1,932,303.07 and 1,893,987.20 MMBtu, respectively, whereas Exhibit 3 reports consumption of 945,634, 1,716,315 and 1,835,990 MMBtu. The June 2026 report shows an "Excess Nomination" of 1,192,366 MMBtu with an amount of \$11,918,890.54; the July 2026 report shows a "Credit Mitigation" of \$1,629,922.33 and a "Carryover Credit" of 152,431.48 MMBtu (\$1,523,705.07); the August 2026 report shows no credit. For the San Juan TM2500 units and the Palo Seco TM2500 and MobilePac units, the reports invoice a "Monthly Qty. Consumed" of 1,180,000 MMBtu (June), 1,229,716 MMBtu (July) and 1,267,918 MMBtu (August), whereas Exhibit 3 reports consumption under the GSA of 982,318, 821,050 and 876,441 MMBtu, and Genera's July 2026 Fuel Consumption Report shows natural gas consumption at the San Juan TM2500 units of 100,333.21 barrels (approximately 581,933 MMBtu) against 990,598.87 MMBtu invoiced.

4.3. Concerning the natural gas quantities invoiced and consumed:

- a. Provide, for each month from December 2025 through September 2026 and for each Delivery Point, in native Excel: (i) the Scheduled Monthly Quantity nominated; (ii) the quantity made available by the Seller; (iii) the quantity consumed per the Fuel Consumption Report; (iv) the quantity invoiced; (v) the ToP Quantity under Section 4.5.1 and the ToP Payment under Section 4.5.2; (vi) any mitigation credit under Section 4.5.3; (vii) any ToP Credit Quantity and ToP Carryover Credit under Section 4.5.4, identifying credits applied and credits expired; (viii) the DoP Quantity under Section 4.4.1 and DoP Payment under Section 4.4.3; (ix) any Buyer Excused Quantities; and (x) the HH and fixed component used in the Gas Price. For the SJ 5&6 Agreement through July 31, 2026, provide the equivalent categories under that contract.

Response:

Please see Exhibit 2.

Genera clarifies that any calculations related to ToP quantities and payments, DoP quantities and payments, mitigation credits, carryover credits, or other related contractual adjustments are preliminary estimates provided for informational purposes only. These calculations are subject to and contingent to any force majeure claim, notices, or any other contractual mechanism raised by the Seller. The approval, rejection or final determination regarding the calculations, ToP payments, DoP payments, force majeure claims issued by Seller or any other condition that affect a contract enforcement provision is the responsibility of the P3A pursuant to Section 22.13 of the GSA or its delegate, the 3PPO.

Accordingly, Genera's submission of these estimates should not be construed as an acknowledgment, acceptance, or determination of the validity of any force majeure claim or of any resulting contractual obligation or entitlement.

- b. Explain what the "Monthly Qty. Consumed" invoiced for the San Juan and Palo Seco temporary units represents, why it exceeds the consumption reported in Exhibit 3 and in the Fuel Consumption Reports, and what portion of the difference in each month constitutes a ToP Quantity for which a ToP Payment was made.

Response:

If referring to the information presented on the monthly fuel purchase report, the quantities presented for the San Juan and Palo Seco temporary units, when considered together, represent the total amount invoiced for these units, not just the units consumption, as presented on the Fuel Consumption Reports.

- c. State the total dollar amount included in the fuel costs submitted to LUMA for June, July and August 2026, and therefore in the June-August 2026 FCA reconciliation, for natural gas that was invoiced but not consumed, by contract, month and Delivery Point, net of any credit. State whether the "Total Fuel Purchase Cost" for July and August 2026 in the Fuel Budget Report includes those amounts.

Response:

Genera respectfully requests clarification regarding the scope of this requirement.

4.5. Concerning the Annual ToP Quantity of Section 4.3.2:

a. Provide, for each month of the Contract Year to date, the quantity nominated, the quantity made available by the Seller, the quantity taken, and the differences, and the projected quantities for October, November and December 2026 under (i) the September 4, 2026 nominations and (ii) Genera's current expectation in light of the Vessel Events.

Response:

Please see Exhibit 3.

b. Based on the foregoing, state whether Genera expects the annual quantity taken to fall below the Annual ToP Quantity of 40,000,000 MMBtu, or such adjusted Annual ToP Quantity as Genera applies in its nomination planning, which it shall state. If yes, state the expected shortfall in MMBtu and the estimated Annual ToP Payment computed as the shortfall multiplied by $(115\% \times \text{HH} + \text{ToP Adder})$, identifying the HH value assumed.

Response:

Yes. Genera expects the annual quantity taken to fall below the Annual ToP Quantity. As of the date of this answer, Genera cannot provide an exact amount of the projected quantity but expects the number to be around \$73M. For details, please see Exhibit 3.

Genera clarifies that any calculations related to ToP quantities and payments, DoP quantities and payments, mitigation credits, carryover credits, or other related contractual adjustments are preliminary estimates provided for informational purposes only. These calculations are subject to and contingent to any force majeure claim, notices, or any other contractual mechanism raised by the Seller. The approval, rejection or final determination regarding the calculations, ToP payments, DoP payments, force majeure claims issued by Seller or any other condition that affect a contract enforcement provision is the responsibility of the P3A pursuant to Section 22.13 of the GSA or its delegate, the 3PPO.

Accordingly, Genera's submission of these estimates should not be construed as an acknowledgment, acceptance, or determination of the validity of any force majeure claim or of any resulting contractual obligation or entitlement.

4.6. For each month from December 2025 through September 2026, state how much of the difference between the natural gas nominated and the natural gas consumed at each Delivery Point is attributable to the unavailability of TM2500 or MobilePac units at the San Juan and Palo Seco power plants. For each month identify:

a. Each TM2500 or MobilePac unit that was out of service, the dates, and the cause, cross-referenced to Exhibit 1 of Genera's September 22, 2026 filing and to the fleet status reported in Case No. NEPR-MI-2024-0005.

Response:

Please see Exhibit 4.

b. The quantity of natural gas (MMBtu) that was not consumed because of each unit's unavailability.

Response:

Please see response to RFI 4.6(a).

c. Whether that quantity was made available by the Seller and not taken, and therefore constitutes a ToP Quantity under Section 4.5.1 for which the Buyer paid or will pay a ToP Payment under Section 4.5.2.

Response:

There are instances where Genera has paid for amounts available and not taken.

d. Whether the unavailability qualified as a "Forced Shutdown" under Section 4.5.4, and whether, and on what date, Genera notified PREPA and 3PPO of the event for purposes of a ToP Credit Quantity and ToP Carryover Credit.

Response:

Genera experienced forced shutdowns on several TM units, MobilePacs, and San Juan 5 & 6 throughout the year. Genera is currently analyzing and calculating the potential TBtu credit amounts to notify, document, and raise ToP credit quantities against the annual ToP to 3PPO and P3A before contract year ends. Genera expects to have a final calculation by December 1, 2026.

e. The dollar value of each of the foregoing quantities at the applicable Gas Price.

Response:

Please see response to RFI 4.6 (c).

A.4 – The Vessel Events and Their Effect on the Factors

For purposes of this Part, the Energy Bureau distinguishes the FSU Departure from the Carrier Hold. Genera's monthly reports identify the storage vessels serving the San Juan terminal as the Energos Princess and the Energos María, which have alternated at the jetty (for example, on August 8 and August 30, 2026). Genera's response of September 24, 2026 identifies the Amur River as the only vessel scheduled by NFEnergía, with an expected arrival date of September 17, 2026. Answer each question separately for the FSU Departure and for the Carrier Hold.

4.11. Concerning the contractual characterization of the Vessel Events:

e. Provide, for each day from September 16, 2026 through the date of the response and for each Delivery Point, in native Excel: the daily quantity scheduled; the quantity made available; the quantity consumed; the ULSD burned (barrels and MMBtu); the MWh generated; the status of each unit (in service on gas, in service on diesel, out of service and cause); and the incremental fuel cost of operating on ULSD instead of natural gas at the applicable prices.

Response:

Genera respectfully requests an extension until Wednesday, October 28, 2026, to provide the requested information. Given the volume and level of detail required, additional time is necessary to gather, validate, and consolidate the information from the relevant departments to ensure an accurate and comprehensive response.

4.13. Concerning the assumptions provided to LUMA on September 9, 2026 for the factors taking effect on October 1, 2026:

a. Do the Vessel Events affect the unit availability and scheduled maintenance assumptions Genera provided? If yes, identify each affected unit and explain how its expected availability, or the fuel on which it will operate, has changed. If no, explain why not.

Response:

The Vessel Events did not affect the expected availability or scheduled maintenance assumptions for the TM units or San Juan Units 5 and 6. Genera had backup ISO tanks available to support the continued operation of the TM units during the Vessel Events. Additionally, San Juan Units 5 and 6 were capable of operating on diesel and remained available for dispatch. Accordingly, the Vessel Events did not affect the availability of these units, as alternative fuel arrangements were in place to support their continued operation.

b. Do the Vessel Events affect the fuel cost forecast? If yes, explain how and by how much the forecasted costs for each month should change, by fuel and Delivery Point. If no, explain why not.

Response:

No. Genera cannot forecast vessel events or additional unforeseen disruptions. Genera cannot foresee force majeure events, short fall events, facility shutdowns (other than does already planned or notified) due to Seller's fault.

c. State whether Genera has provided, or will provide before October 1, 2026, revised assumptions to LUMA, and the date.

Response:

Genera provided revised assumptions to LUMA September 18, 2026 and October 20, 2026.

4.14. Concerning the factors in effect for July through September 2026:

a. State, by fuel and plant, the September 2026 fuel price and quantity forecast underlying those factors and the actual results for September 2026 to date and quantify the variance attributable to the Vessel Events.

Response:

Genera respectfully requests clarification regarding the scope of this requirement.

b. Identify each unit that was expected to be available on natural gas in September 2026 and that has been taken out of service or switched to ULSD because of the Vessel Events, with the dates affected, the ULSD burned and its cost.

Response:

When nominations were made, the following units were supposed to be available for September:

Palo Seco	San Juan
TM 2	TM 2
MP 1	TM 3
MP 3	TM 4
	TM 5
	TM7
	TM 10
	SJ 5
	SJ 6

For the dates affected, the ULSD burned and its cost, please see the table below:

Consumption		ULSD consumption 9/16 to 9/30		ULSD consumption 9/16 to 9/30		Incremental Cost due to fuel substitution	
Barrels		Barrels		MMBtu		\$	
SJ	SJCT5	85,714.29	126,933.78	736,215.92		18,741,891.42	
SJ	SJCT6	23,880.95					
SJ	TM 01	0					
SJ	TM 02	41.2	207.80	35.83			
SJ	TM 03	0					
SJ	TM 04	72.69					
SJ	TM 05	4,481.13		10.37			
SJ	TM 06	0					
SJ	TM 07	192.01					
SJ	TM 08	0		25.46			
SJ	TM 09	0					
SJ	TM 10	4,413.20					
PS	MP1	8,138.31					
PS	MP2	0					
PS	MP3	0					
PS	TM 01	0					
PS	TM 02	0					
PS	TM 03	0					
PS	TM 04	0					

Note: Consumption values taken from September/2026 monthly reports for San Juan and Palo Seco.

c. State the amount Genera expects to include in the September 2026 FCA reconciliation as a result of the Vessel Events, and whether Genera proposes to recover any such amount from customers before any claim against NFEnergía for the same quantities is resolved.

Response:

Genera submitted the Fuel Purchases Monthly Report and the Fuel Report to LUMA on October 7, 2026. LUMA uses this information to develop the factors driving the fuel cost variances including (i) increased fuel usage and costs, (ii) higher consumption associated with above-normal temperatures (iii) expected consumption of the type of fuel, and (iv) unexpected issues across the generating fleet. These reports were submitted on October 15, 2026. With this information, the T&D Operator can make the required projections and submit, after their independent analysis, the proposed amounts of the FCA.

A.5 – Supporting Documents

4.15. Provide copies of:

- a.** Every notice, nomination confirmation, curtailment or shortfall notice, and Force Majeure notice received from NFEnergía from June 1, 2026 through the date of the response.

Response:

Please see Exhibit 5.

b. Every NFEnergía invoice for June, July, August and September 2026 with the supporting documentation furnished under Section 9.1, and any dispute notice under Section 9.2.

Response:

Please see Exhibit 6.

c. Every communication between Genera and NFEnergía concerning the FSU Departure, the Carrier Hold, the replacement storage vessel or the availability of gas since September 10, 2026.

Response:

Please see Exhibit 5 & 7.

d. Every communication between Genera and PREPA, 3PPO or LUMA concerning the effect of the Vessel Events on the October through December 2026 forecast.

Response:

There are no communications between Genera and PREPA, 3PPO or LUMA concerning the effect of the Vessel Events on the October through December 2026 forecast.

A.6 – Federal Permitting of the San Juan LNG Terminal and Continuity of Supply

On June 15, 2026, the U.S. Army Corps of Engineers ("USACE") public-noticed NFEnergía's application for a Department of the Army permit (File No. SAA-2026-00110 (SP-TCP)) to dredge the berth pocket at Puerto Nuevo Piers A, B and C from approximately 35 to 46 feet, dispose of the dredged material at the San Juan Harbor ocean disposal site, and relocate the berthing line approximately 36 feet waterward, so that fully laden LNG carriers of up to 155,000 m3 can remain continuously moored at the piers as floating storage for the Micro-Fuel Handling facility, which has no onshore LNG storage. By letters of June 29 and June 30, 2026, the San Juan Bay Pilots and the U.S. Coast Guard Captain of the Port San Juan objected on navigation grounds. On August 31, 2026, USACE requested additional information from NFEnergía, stated that vessel occupancy of the berth approximately 98 percent of the time may constitute a "permanently moored floating vessel" requiring authorization under Section 10 of the Rivers and Harbors Act, noted that the only prior USACE authorization (Nationwide Permit 3 verification of March 6, 2019) is expired and did not cover the present configuration, and stated that the application will be deemed withdrawn if no response is received within thirty days. On September 11, 2026, FERC issued Engineering Information Request No. 13 in Docket No. CP21-496-000 requiring NFEnergía to file within thirty days the information on the dredging and permanent mooring modifications that had not been disclosed in the FERC docket, and on September 14, 2026 FERC accepted USACE as a cooperating agency for the Environmental Impact Statement on NFEnergía's Section 3 application, pending since September 15, 2021. The terminal operates under a temporary FERC authorization. On July 16, 2025, in Case No. NEPR-MI-2024-0005, the Energy Bureau ordered PREPA to file a comprehensive Fuel-Security Contingency Plan covering the San Juan power plant and the TM2500 units at San Juan and Palo Seco.

4.16. Concerning the federal permitting of the NFEnergía terminal and the continuity of natural gas supply to the San Juan and Palo Seco Delivery Points:

a. State when and how Genera became aware of the Department of the Army permit application, the Coast Guard and Pilots objections, the USACE letter of August 31, 2026 and FERC's information request of September 11, 2026, and provide every communication in which NFEnergía informed Genera of these matters or of any restriction on the movement, berthing, laden capacity or size of vessels at the San Juan terminal.

Response:

NFE has not informed Genera of these matters or of any restriction on the movement, berthing, laden capacity or size of vessel at the San Juan terminal.

b. State whether the Vessel Events are related to the navigation, berth-depth or berth-occupancy concerns raised by the Coast Guard and the Pilots, including whether the size or laden draft of the Amur River, the depth of the berth (approximately 35 feet), or any condition imposed by the Coast Guard or the Pilots has prevented or delayed its entry or berthing, and whether NFEnergía has so informed Genera.

Response:

Genera understands, based on press releases and the temporary restraining order filed by the San Juan Bay Pilot, that the vessel was unable to enter the port due to NFE's maneuvers that would allegedly violate the parties Court approved interim stipulation of measures. On September 21, 2026, Genera received a force majeure letter from NFE stating that the vessel was unable to enter the port because of the cancelation of the vessel schedule due to a Court Order.

c. Identify each LNG carrier and floating storage unit that has served the terminal since December 5, 2025 (name, IMO number, capacity in m³ and laden draft), the dates on which each was at berth, and each occasion on which a vessel could not berth fully laden, had to wait offshore, was lightered, or had to leave the berth because of depth, navigation or berth-occupancy constraints, with the effect on the gas made available at each Delivery Point.

Response:

Genera does not have information regarding the vessels' IMO numbers, capacities in cubic meters (m³), or laden drafts. For additional information regarding vessel swaps, please refer to the Monthly Report on Natural Gas Supply Contracts and Fuel Switching Limitations, submitted on the 15th day of each month in this Docket. This report is submitted in compliance with the Energy Bureau's Resolution and Order issued on July 16, 2025, in docket NEPR-AP-20204-0001, and provides a summary of all incidents related to vessel fuel swaps since August 2025.

d. State what NFEnergía has represented to Genera regarding the timing of the dredging and berth modifications, the vessels it intends to use pending USACE and FERC action, and the continuity of gas supply if the Department of the Army permit is denied, conditioned or deemed withdrawn, or if FERC modifies or revokes the temporary authorization; provide any written assurance or supply plan received.

Response:

Genera has not held any communications with NFE regarding this matter.

e. State whether the natural gas supply assumptions Genera provided to LUMA for October through December 2026, and its nominations for those months, account for any limitation on the size, laden capacity or continuous berth occupancy of the storage vessel. If they do not, state the effect on the quantities Genera expects to receive at each Delivery Point, and on its fuel cost forecast, of a storage vessel that cannot remain continuously moored or must berth partially laden.

Response:

Genera's natural gas supply assumptions provided to LUMA for October through December 2026, and its nominations for those months do not account for any limitations on the size, laden capacity or continuous berth occupancy of the storage vessel. Genera nominates and expects to receive the gas that is required for continued operations of the units.

f. Describe Genera's operational contingency for the San Juan and Palo Seco units if natural gas supply through the San Juan terminal is interrupted for an extended period, including the ULSD storage and delivery capacity at each site (tank capacity, days of full-load operation, truck and barge delivery rates), the units that cannot operate on ULSD, and the incremental monthly fuel cost of operating the San Juan and Palo Seco units on ULSD at the prices in Attachment 3 FCA.

Response:

Please see Genera's Fuel-Security Contingency Plan as Exhibit A on August 7, 2025 in NEPR-MI-2024-0005. In addition, please see Exhibit 8 and the table below:



FUEL OFFICE REPORT
FUEL RESERVES & OPERATIONAL DAYS
Friday, October 23, 2026

ULSD per Power Station							
Power Station	Units in service	Capacity factor	Daily Consumption (Bbls)	Fuel Reserve (Bbls)	Operational days with available fuel	Receiving Capacity (Bbls)	Next Delivery Date & estimated volume
San Juan C.C.	1	100%	5,600	26,563	3.4	35,592	10/23/26 30K bbls
San Juan Temp. Gens.	2	100%	2,194				
Palo Seco Temp. Gens.	0	100%	0	21,114	--	17,323	10/23/26 10K bbls.

g. State whether Genera participated in or contributed to the Fuel-Security Contingency Plan that the Energy Bureau ordered PREPA to file in Case No. NEPR-MI-2024-0005, whether that plan addresses the loss or restriction of the floating storage berth at the San Juan terminal, and, if it does not, what Genera proposes to add to it.

Response:

Yes. Genera filed its own proposed Fuel-Security Contingency Plan as Exhibit A on August 7, 2025 in NEPR-MI-2024-0005. PREPA's August 8 filing stated that Genera's submission and plan fulfilled the requirements of the August 1 Order.

Genera does not plan to amend the filed plan since it addresses fuel interruptions through alternate-fuel procurement, reserves, dispatch coordination and emergency communications.