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

IN RE:	**CASE NO. NEPR-MI-2021-0002**
REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN-DECEMBER 2020	**SUBJECT: Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System (October 2026)**

INFORMATIVE MOTION ON THE STATUS OF SOW: 4 X 25 MW BESS INTERCONNECTIONS AT LUMA 38KV SYSTEM (OCTOBER 2026)

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC, and **LUMA Energy ServCo, LLC**, (jointly referred to as "LUMA"), through the undersigned legal counsel and respectfully submit the following:

I. Relevant Procedural Background

1. On March 26, 2021, this Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order in the instant proceeding, ordering, in pertinent part, that the Puerto Rico Electric Power Authority ("PREPA") submit to the Energy Bureau the specific projects to be funded with Federal Emergency Management Agency ("FEMA") funds or any other federal funds at least thirty (30) calendar days prior to submitting these projects to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency ("COR3"), FEMA or any other federal agency ("March 26th Order"). It also directed PREPA to continue reporting to the Energy Bureau and FEMA within the next five years, the progress of all ongoing efforts related to the approval of the submitted projects not yet approved by the Energy Bureau.[1] This Energy Bureau thereafter

[1] On April 22, 2026, the Energy Bureau issued a Resolution and Order ("April 22nd Order"), in which it extended the March 26th Order's reporting period for an additional five (5) years. *See* April 22nd Order, p.2. The Energy Bureau stated that all the other provisions of the March 26th Order would remain in full force and effect. *Id*.

determined that this directive applied to PREPA and LUMA. *See* Resolution and Order of August 20, 2021.

2. On August 25, 2023, LUMA filed a *Motion Submitting One Scope of Work, Request for Confidentiality, and Supporting Memorandum of Law* ("August 25th Motion"). Therein, LUMA submitted the scope of work ("SOW") for the "4 x 25 MW BESS Interconnections at LUMA 38kV System" transmission and distribution project ("4 x 25 MW BESS T&D Project"), for the Energy Bureau's review and approval before submitting it to COR3 and FEMA.

3. On August 30, 2023, the Energy Bureau entered a Resolution and Order ("August 30th Order") in which it approved the 4 x 25 MW BESS Project SOW, determining that this project was necessary to improve the system's reliability.

4. Then, on January 3, 2025, the Energy Bureau entered a Resolution and Order ("January 3rd Order") in which it ordered LUMA "to inform, on or before January 9, 2025, the status of the approval process, the actual contracted cost to construct, and the status of the [4 x 25 MW BESS Project]." *See* January 3rd Order, p.2.

5. On January 9, 2025, LUMA filed its *Informative Motion on the Status of SOW: 4 x 25 MW BESS Interconnections at LUMA 38kV System* to comply with the January 3rd Order.

6. On January 14, 2025, the Energy Bureau issued a Resolution and Order whereby it ordered LUMA to file a status report of the 4 x 25 MW BESS Project until its June 2025 completion date ("January 14th Order"). *See* January 14th Order, p. 2. The Energy Bureau directed that the status report include:

> i) The locations of the twenty (20) sites studied;
> ii) The final four selected sites;
> iii) The cost to complete the studies of the twenty sites.
> iv) Indicate the funds utilized to pay for these studies and the amount spent to date.

v) The reimbursement status of these funds, or if they were advanced by FEMA
vi) The [Detailed SOW ("DSOW")] presented to FEMA and COR3;
vii) The ROI and LUMA responses to such ROI requested by FEMA and COR3;
viii) The FAASt number for the project; and
ix) An updated cost estimate based on the DSOW.

See Id.

7. On October 15, 2026, the Energy Bureau issued a Resolution and Order ("October 15th Order") whereby it ordered LUMA to withdraw this project from the Consolidated list and stop any additional work. *See* October 15th Order, p.2.

8. In compliance with the January 14th Order, LUMA hereby submits its monthly status report as *Exhibit 1* to this Motion.

RESPECTFULLY SUBMITTED.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau. We will send an electronic copy of this Motion to PREPA via Alexis Rivera, alexis.rivera@prepa.pr.gov, and through its counsel of record, Natalia Zayas Godoy, nzayas@gmlex.net, Richard Cruz Franqui, rcruzfranqui@gmlex.net, and Mirelis Valle Cancel, mvalle@gmlex.net, to Genera PR LLC, through its counsel of record, Jorge Fernández-Reboredo, jfernandez@ecija.com, José J. Díaz Alonso, jdiaz@ecija.com, Ernesto R. Ramos Maldonado, eramos@ecija.com.

In Guaynabo, Puerto Rico, on the 27th day of October 2026.

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Exhibit 1

4x25 MW BESS Interconnections at LUMA 38 kV System Project Monthly Status Report

(October 2026)

4x25 MW BESS Interconnections at LUMA 38 kV System Project

Monthly Status Report

October 27, 2026

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1.0 Introduction

In accordance with the Resolution and Order (R&O) dated January 14, 2025, issued by the Puerto Rico Energy Bureau (Energy Bureau) in Case No.: NEPR-MI-2021-0002 *In Re: Review of the Puerto Rico Power Authority's 10-Year Infrastructure Plan – December 2020*, LUMA is required to provide a monthly report regarding the 4x25 MW BESS Interconnections at the LUMA 38 kV project. This report focuses on the key activities and progress LUMA achieved in the past 30 days for the Battery Energy Storage Systems (BESS, or collectively, the Project) approved by the Energy Bureau in its Resolution dated August 30, 2023 (August 30 Resolution).

The BESS projects remained inactive from August 2025 until July 15, 2026, when they were reactivated in the FEMA Grants Portal through the coordinated efforts of LUMA, the Puerto Rico Electric Power Authority (PREPA), the Federal Emergency Management Agency (FEMA), and other relevant stakeholders. Following reactivation, LUMA continued working with FEMA to clarify the applicability and implementation of Section 406 Hazard Mitigation (HM) funding before advancing new project execution activities. On October 15, 2026, the Energy Bureau issued a Resolution and Order (October 15 Resolution) directing LUMA to withdraw the Project from the Consolidated List and stop any additional work.

2.0 Monthly Status Update

2.1 Detailed Scope of Work

During the reporting period, LUMA continued coordinating with the Energy Bureau, the Central Office for Recovery, Reconstruction and Resilience (COR3), PREPA, and FEMA regarding the BESS initiative, with particular emphasis on FEMA's Section 406 HM evaluation.

On October 14, 2026, LUMA met with FEMA to review the revised HM narrative and discuss the path forward for the proposed BESS facilities. During the meeting, FEMA agreed to continue evaluating the project under the Section 406 Hazard Mitigation framework and requested that LUMA submit an updated Detailed Scope of Work (DSOW) no later than October 28, 2026. This direction confirms FEMA's intent to proceed with the review of the mitigation proposal and provides a path for advancing the eligibility determination.

To support FEMA's evaluation, LUMA has identified the following key activities:

1. **Submission of FEMA Section 406 Justification**

   Status: **In Progress**

   Consistent with FEMA's direction provided on October 14, 2026, LUMA is finalizing updated DSOW documentation for the Aguadilla BESS facility, as a pilot proposal. The updated package will reflect the latest engineering assumptions and project scope definition necessary to support FEMA's continued Section 406 Hazard Mitigation review.

   LUMA expects to submit the updated DSOW package to FEMA by October 28, 2026.

2.2 Procurement

Before issuance of the October 15 Resolution, LUMA anticipated initiating procurement following FEMA's obligation of the Project. In light of the Energy Bureau's directive to stop any additional work, the previously anticipated procurement activities and milestones are on hold.

2.3 Design Status

Preliminary Design had been completed before issuance of the October 15 Resolution. Detailed design was previously anticipated to be performed by an Architectural & Engineering vendor that would be selected through a competitive procurement process following FEMA's obligation of the project.

2.4 Project Schedule

Before issuance of the October 15 Resolution, LUMA had developed an anticipated schedule reflecting the expected milestones and dependencies associated with FEMA's continued Section 406 evaluation and subsequent project implementation. The dates provided were planning milestones and were contingent upon the ongoing Section 406 discussions with FEMA, including resolution of the Section 406 HM funding pathway and FEMA's approval of the applicable HM narrative.

- Resubmit DSOW to FEMA: December 2026
- FEMA DSOW Review: December 2027
- Procurement Start: January 2028 (After Obligation Approval)
- Construction Start: June 2029
- Commissioning: December 2030

3.0 Project Status

3.1 Selected Sites

Proposed project sites had been identified and validated through engineering assessments and site investigation activities. Completion of the required real estate acquisition process remained an outstanding activity. Before issuance of the October 15 Resolution, LUMA anticipated initiating property acquisition activities following FEMA obligation and authorization to proceed with project implementation.

Table 1. Land Acquisition Milestones and Estimated Timeline

Milestone	Estimated Duration	Projected Completion
FEMA Tier 1 Inclusion & Grants Portal Activation	Several weeks	Completed (July 15, 2026)
DSOW Approval by FEMA	12 Months	12 Months after DSOW submission
Phase 1 ESA Initiation	2 Months	+2 Months from Obligation

Milestone	Estimated Duration	Projected Completion
Land Appraisal & Due Diligence	1-2 Months	+3-4 Months
Negotiation & Legal Review	6-7 Months	+10-11 Months
Closing & Title Transfer	1 Month	+12 Months

3.2 Reimbursement Status

The table below shows reimbursements received before the project's status changed.

Table 2. Reimbursement Received

Project Title	Reimbursement Received
FAASt [4 x 25 MW BESS Interconnections on LUMA System] (Substation)	$132,861.59
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	$8,027.34
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	$161,797.74
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	$47,355.27

3.3 Requests for Information

LUMA completed all pending Request for Information (RFI).

3.4 FAASt Number

As indicated in Section 3.2 above, LUMA identified four areas where it intended to site the projects. On July 15, 2026, the four BESS projects received new FEMA FAASt numbers as part of the reactivation process:

Table 3. FAASt Number

Project Title	FEMA FAASt #
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	1070280
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	1070284
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	1070282
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	1070283

3.5 Updated Project Cost

The following table contains an updated cost estimate based on the Barceloneta, Manatí, Aguadilla, and San Juan Detailed Scopes of Work (DSOWs) submitted to FEMA.

Table 4. Class 3 Cost Estimate

Project Title	Class 3 Cost Estimate ($)
FAASt [4 x 25 MW BESS Interconnections Barceloneta] (Substation)	$55,941,767
FAASt [4 x 25 MW BESS Interconnections Manatí] (Substation)	$57,640,005
FAASt [4 x 25 MW BESS Interconnections Aguadilla TC] (Substation)	$52,720,520
FAASt [4 x 25 MW BESS Interconnections Monacillos TC] (Substation)	$55,503,065