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

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 RFI 4.11(e) of Fourth Request for Information

MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF SEPTEMBER 25, 2026 AND RESPONDING TO RFI 4.11(e) 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, 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. The *September 25 Resolution* further directed the parties to supplement their responses, without further order, as additional responsive information became available and upon the occurrence of the events identified therein.

3. 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 which Genera submitted its responses to most of the questions directed to Genera in the Fourth RFI, together with the supporting information and documentation then available.

4. Thereafter, on October 23, 2026, Genera filed a *Motion in Compliance with Resolution and Order of September 25, 2026, and Responding to Additional Questions of Fourth Request for Information* ("October 23 Motion"). Through that filing, Genera submitted responses to the additional outstanding questions of the Fourth RFI, leaving only RFI 4.11(e) pending.

5. RFI 4.11(e) requires, for each day from September 16, 2026, through the date of the response and for each Delivery Point, detailed information concerning the daily quantity scheduled, quantity made available, quantity consumed, ULSD burned, MWh generated, unit status, and the incremental fuel cost of operating on ULSD instead of natural gas. Given the volume and level of detail required, Genera requested a brief extension of three (3) business days, until October 28, 2026, to gather, validate, and consolidate the responsive information from the relevant departments.

6. In further compliance with the *September 25 Resolution*, and supplementing the responses previously submitted through the *October 15 Motion* and the *October 23 Motion*, Genera hereby submits, as **Exhibit A** to this Motion, its response to RFI 4.11(e).

7. Genera clarifies that the daily ULSD consumption figures provided in Exhibit A are based on fuel inventory measurements and calculations that consider the applicable storage tank capacities. As such, these figures are subject to inherent measurement variability associated with daily tank readings, including differences in the timing of measurements, sampling procedures, and other operational factors that may affect the quantities recorded on a particular day. Consequently, minor discrepancies may arise in the daily consumption figures. However, these variations are addressed through the reconciliation process performed in preparing Genera's monthly fuel consumption reports, which provides a more comprehensive assessment of fuel consumption over the reporting period.

8. The response submitted through this Motion should be read together with the responses and supporting documentation previously submitted by Genera on October 15 and October 23, 2026. Taken together, those submissions provide Genera's responses to the questions directed to Genera in Part A of the Fourth RFI based upon the information presently available to Genera.

9. With the submission of its response to RFI 4.11(e), Genera has now submitted responses to all questions directed to it in the Fourth RFI.

WHEREFORE, Genera respectfully requests that the Energy Bureau TAKE NOTICE of the foregoing; RECEIVE AND ACCEPT Genera's response to RFI 4.11(e) of the Fourth Request for Information attached hereto as Exhibit A, together with the supporting information; DEEM GENERA IN COMPLIANCE with the *September 25 Resolution's* requirement to submit its responses to the Fourth RFI, subject to the continuing supplementation requirements established therein; and grant such other relief as the Energy Bureau may deem just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th 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 attorneys who have filed a notice of appearance in this case.

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Exhibit A

DATE	MP1			MP2			MP3			TM 01			TM 02			TM 03			TM 04		
	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)	ULSD (BARRELS)	ULSD (MMBtu)	GENERATION (MWH)
9/16/2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/17/2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/18/2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/19/2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/20/2026	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/21/2026	430	2434	224	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/22/2026	685	3973	368	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/23/2026	843	4888	451	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/24/2026	842	4883	454	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/25/2026	818	4766	434	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/26/2026	714	4141	384	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/27/2026	732	4243	395	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/28/2026	891	5166	488	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/29/2026	818	4745	443	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
9/30/2026	738	4289	392	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/1/2026	914	5304	288	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/2/2026	527	3055	138	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/3/2026	266	1542	216	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/4/2026	406	2318	206	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/5/2026	383	2223	408	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/6/2026	754	4373	191	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/7/2026	358	2074	207	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/8/2026	427	2479	438	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/9/2026	821	4774	364	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/10/2026	682	3953	312	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/11/2026	584	3385	425	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/12/2026	789	4577	585	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/13/2026	1098	6369	346	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/14/2026	647	3751	445	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/15/2026	834	4840	322	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/16/2026	610	3541	441	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/17/2026	837	4853	392	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/18/2026	740	4294	478	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/19/2026	901	5225	478	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/20/2026	891	5165	471	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/21/2026	876	5084	584	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/22/2026	1101	6388	520	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/23/2026	988	5733	585	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/24/2026	1160	6377	432	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/25/2026	816	4734	516	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/26/2026	976	5659	576	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
10/27/2026	1085	6291	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Unit	Status as of Oct 28th	Cause
San Juan CT 5	In service on Diesel	
San Juan ST 5	Out of service	Steam seal issues.
San Juan CT 6	In service on Gas	
San Juan ST 6	Out of service	Unit startup in progress. Unit high vibrations - MD&A vibrations Technical Advisor on site.
San Juan TM 1	Out of service	Explosion on breaker of TM 1.
San Juan TM 2	In service on Gas	
San Juan TM 3	In service on Diesel	
San Juan TM 4	In service on Gas	
San Juan TM 5	In service on Diesel	
San Juan TM 6	Available on Gas for Extreme Emergency	Damage to compressor and high pressure turbine.
San Juan TM 7	In service on Gas	
San Juan TM 8	Out of service	High temperature spread.
San Juan TM 9	Out of service	13 kv bus failure.
San Juan TM 10	In service on Diesel	
Palo Seco MP 1	In service on Diesel	
Palo Seco MP 2	Out of service	Oil bearing drain high pressure.
Palo Seco MP 3	Out of service	Pressure on breather. Under evaluation by Mitsubishi.
Palo Seco TM 1	Out of service	Internal issues at HPC.
Palo Seco TM 2	Out of service	Fault on block 3 of the Main Power Transformer.
Palo Seco TM 3	Out of service	High temperature spread.
Palo Seco TM 4	Out of service	IGV control system.