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

IN RE: LUMA'S ACCELERATED STORAGE ADDITION PROGRAM	**CASE NO. NEPR-MI-2024-0002** **SUBJECT:** Quarterly Report for First Quarter of Fiscal Year 2026-2027, and Request for Confidential Treatment

MOTION TO SUBMIT ASAP QUARTERLY REPORT FOR FIRST QUARTER OF FISCAL YEAR 2026-2027 AND REQUEST FOR CONFIDENTIAL TREATMENT

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy Servco, LLC** ("ServCo") (jointly referred to as "LUMA"), through the undersigned counsel, and respectfully states and requests the following:

I. Introduction

The Accelerated Storage Addition Program ("ASAP") is a program developed by LUMA and approved by the Puerto Rico Energy Bureau ("Energy Bureau") proposing the accelerated integration of Battery Energy Storage Systems ("BESS") to the Puerto Rico electrical system to be dispatched to provide time shift services, voltage and frequency support and other ancillary services resulting in improved system reliability, reduction of load shedding events and lower costs to customers. This program involves providing a standard offer ("SO") for adding BESS capacity at qualified independent power producers' facilities using SO Agreements.

In compliance with an Energy Bureau Resolution and Order of March 5, 2025, LUMA is submitting with this motion a quarterly report on the implementation of ASAP for the first quarter ("Q1") of Fiscal Year ("FY") 2027.

II. Relevant Background and Procedural History

1. On May 8, 2024, the Energy Bureau issued a Resolution and Order approving the ASAP concept proposed by LUMA[1] and authorizing LUMA to proceed with the development of the SO Agreements.

2. After other procedural events, on February 28, 2025, LUMA filed a proposed ASAP Implementation Program Plan, a companion cost recovery procedure, and an ASAP status update.[2]

3. On March 5, 2025, the Energy Bureau issued a Resolution and Order ("March 5th Order") in which it approved the ASAP Implementation Program Plan and companion document in the February 28th Motion and directed LUMA to submit quarterly reports discussing in detail the progress of ASAP implementation.

4. On June 23, 2025, LUMA informed, among others, that it would be filing a quarterly report on ASAP within thirty (30) days from the end of the fourth quarter of FY 2025 in compliance with the March 5th Order.[3]

III. Submittal of FY 2026 Q4 Report

5. In compliance with the March 5th Order, LUMA is submitting herein the FY 2027 Q1 report on ASAP discussing in detail the progress of ASAP implementation. *See Exhibit 1*.

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[1] *See Motion to Submit ASAP Structure and Concept in Compliance with Resolution and Order issued on April 19, 2024, and Request for Determination of Consistency with Energy Public Policy and IRP*, Exhibit 1.
[2] *See Motion to Submit Program Implementation Plan and Associated Documents, Request for Approval of ASAP Cost Recovery Mechanism, and Request for Confidential Treatment* ("February 28th Motion").
[3] *See Motion in Compliance with Resolution and Order of June 16, 2025, and Request for Confidential Treatment*, p. 8.

LUMA respectfully requests the honorable Energy Bureau to maintain *Exhibit 1* confidential as containing validated trade secret information under applicable laws and regulations, including the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended on September 21, 2016 ("Policy on Confidential Information"). LUMA submits herein the Memorandum of Law stating the legal basis for the request to treat *Exhibit 1* as confidential.

IV. Memorandum of Law in Support of Request for Confidentiality

A. Applicable legal provisions related to the submittal of information confidentially before the Energy Bureau

6. Section 6.15 of the *Puerto Rico Energy Transformation and RELIEF Act*, Act No. 57-2014, as amended ("Act 57-2014") regulates the management of confidential information filed before this Energy Bureau, providing, in pertinent part, that: "[i]f any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the Commission to treat such information as such [….]" 22 LPRA §1054n. If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, "it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted." *Id.* Section 6.15 (a).

7. In connection with the duties of electric power service companies, Section 1.10 (i) of *Puerto Rico Energy Public Policy Act, Act No. 17-2019*, as amended ("Act 17-2019") provides that electric power service companies shall submit information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico. 22 LPRA §1141i.

8. Access to the confidential information shall be provided "only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement." *Id.* Section 6.15(b), 22 LPRA §1054n. Finally, Act 57-2014 provides that this Energy Bureau "shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who need to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review." *Id.* Section 6.15(c).

9. The Energy Bureau's Policy on Confidential Information details the procedures that a party should follow to request that a document or portion thereof be afforded confidential treatment.[4] This document provides that "[a]ny document designated by the [Energy Bureau] as Validated Confidential Information because it is a trade secret under Act 80-2011 may only be accessed by the Producing Party and the [Energy Bureau], unless otherwise set forth by the [Energy Bureau] or any competent court". *Id.* at § D (on Access to Validated Confidential Information).

10. Relatedly, Regulation 8543 includes a provision for filing confidential information in adjudicatory proceedings before this Honorable Energy Bureau.[5]

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[4] In essence, the Policy on Confidential Information requires the identification of confidential information and the filing of a memorandum of law explaining the legal basis and supporting evidence for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation and a summary of the reasons why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* paragraph 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.* paragraph 6.

[5] To wit, Section 1.15 provides that,

> a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to [. . .] Article 6.15 of Act No. 57-2014, as amended.

11. The Puerto Rico legal system recognizes and protects the confidentiality of certain information considered to be privileged. In part, privileged materials are exclusively referred to as the privileges codified in the Rules of Evidence. *E.L.A v. Casta,* 162 DPR 1, 10 (2004). One of these recognized privileges is the company's Trade Secrets:

> The owner of a trade secret has a privilege, which may be claimed by such person or by his or her agent or employee, to refuse to disclose and to prevent another from disclosing it, if the allowance of the privilege will not tend to conceal fraud or otherwise work injustice. If disclosure is directed, the court shall take such protective measures as the interest of the owner of a trade secret and of the parties and the interests of justice require.

See R. Evid. 513, 32 LPRA Ap. IV, R. 513 (2024).

12. In essence, this privilege "protects confidential commercial information" and is "based on public policy considerations aimed at promoting innovation, commercial production and business operation improvement, which in turn contributes to economic and technological development". (translation provided). *Colón Rivera v. Triple-S Salud, Inc.,* 2020 WL 8458051, p. 7 (Puerto Rico Court of Appeals, December 22, 2020).

13. The Puerto Rico Trade and Industrial Secrets Protection Act - Act No. 80 of June 3, 2011, as amended, 10 LPRA § 4131 (2024) ("Act 80-2011") considers a trade secret any information that:

> (a) From which an independent economic value, whether current value or potential value, or a commercial advantage is derived because such information is not commonly known or accessible by appropriate means to those persons who may derive pecuniary benefit from the use or disclosure of such information, and
> (b) which has been subject to reasonable security measures, under the circumstances, to maintain its confidentiality.

10 LPRA § 4132 (translation provided).

14. Act 80-2011 considers reasonable security measures such as those taken by the

owner to limit access to information under particular circumstances. 10 LPRA§ 4133.[6]

15. Article 11(c) of Act 80-2011 establishes that, before ordering any production of a commercial trade secret, it should be determined whether there is a substantial need for the information. (Our translation). 10 LPRA § 4139(c).[7]

B. Request for confidential designation

16. LUMA respectfully requests that the Energy Bureau designate *Exhibit 1* as confidential, pursuant to the protections afforded under Puerto Rico law for trade secrets and proprietary business information. Portions of this document contains detailed, non-public information regarding the implementation of ASAP, including: the identity of certain ASAP participants that has not yet become public and discussion on expenditures, including legal, engineering, and consulting costs, some of which are preliminary and not yet invoiced.

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[6] The following are considered reasonable measures, among others:

> (a) Not disclose the information to individuals or entities not authorized to have access to it;
> (b) limit the number of people authorized to access the information;
> (c) require employees of the company authorized to access the information to sign confidentiality agreements;
> (d) store the information in a separate place from any other information;
> (e) label the information as confidential;
> (f) take measures to prevent indiscriminate reproduction of the information;
> (g) establish control measures for the use or access of the information by employees, or
> (h) implement available technological measures when publishing or transmitting information through the Internet, including the use of email, webpages, discussion forums and any other equivalent means.

Id. (translation provided).

[7] Puerto Rico Courts in adversarial cases have interpreted a "substantial need" when the following four (4) conditions are present:

> (1) The allegations raised for the purpose of establishing the existence or absence of liability have been specifically raised;
> (2) the information sought to be discovered is directly relevant to the allegations specifically raised;
> (3) the information sought to be discovered is such that the party seeking discovery would be substantially prejudiced if not permitted access to it; and
> (4) there is a good faith belief that testimony or evidence derived from the information that is part of the trade secret will be admissible at trial.

Ponce Adv. Med. v. Santiago González, 197 DPR 891, 905 (2017) (translation provided).

17. This information meets the definition of a trade secret under the Puerto Rico Trade and Industrial Secrets Protection Act, Act No. 80 of June 3, 2011, as amended, 10 LPRA § 4132, because it derives independent economic value from not being generally known or readily accessible to competitors or other market participants, and it has been subject to reasonable security measures to maintain its confidentiality, including restricted access, internal labeling, and limited distribution.

18. Disclosure of *Exhibit 1* would risk revealing LUMA's internal strategies, financial assumptions, and technical methodologies, which could undermine its competitive position and disrupt ongoing regulatory and commercial negotiations. Moreover, the document includes proprietary frameworks for cost recovery and project execution that are not publicly available and are the result of significant internal investment and expertise.

19. Following Rule 513 of the Puerto Rico Rules of Evidence and the public policy rationale articulated in *Ponce Adv. Med. v. Santiago González, supra*, LUMA asserts its privilege to protect this trade secret information from public disclosure. The requested confidentiality designation is narrowly tailored and does not impede the Energy Bureau's regulatory oversight. Furthermore, maintaining the confidentiality of *Exhibit 1* does not adversely affect the public interest. On the contrary, it protects the public interest in reducing energy costs and furthers a more successful ASAP program, which will lead to system reliability benefits.

C. Identification of Confidential Information

20. In compliance with the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009), below, find a table summarizing the portions of *Exhibit 1* for which we present this request for confidential treatment. LUMA is also attaching a redacted public version of *Exhibit 1*.

Document	Name	Pages in which Confidential Information is Found, if applicable	Summary of Legal Basis for Confidentiality Protection, if applicable	Date Filed
Exhibit 1	Accelerated Storage Addition Program (ASAP) Quarterly Status Update	Page 7, names of participants in Table 4, first row, 3rd to 11th cells.	Trade Secret under Act 80-2011	October 30, 2026
Exhibit 1	Accelerated Storage Addition Program (ASAP) Quarterly Status Update	Page 8, Table 5, first and second rows after header.	Trade Secret under Act 80-2011	October 30, 2026

WHEREFORE, LUMA respectfully requests that this Energy Bureau **take notice** of those mentioned above; **accept** *Exhibit 1* as the FY2027 Q1 ASAP quarterly report in compliance with the quarterly reporting requirement in the March 5th Order; **accept** the memorandum of law in support of the confidential treatment of *Exhibit 1*; and **grant** the request stated herein to keep *Exhibit 1* under seal.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 30th of October 2026.

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau and we will send a courtesy copy of this motion to hrivera@jrsp.pr.gov; alexis.rivera@prepa.pr.gov; oramos@pmalaw.com; agraitfe@agraitlawpr.com; javier.vazquez@oneillborges.com; amilkar.cruz@oneillborges.com; antonio.collazo@oneillborges.com; mgarcia@pmalaw.com; apc@mcvpr.com; cfl@mcvpr.com.

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Exhibit 1

ASAP FY2027 Q1 Report

[Redacted version; unredacted version submitted under seal of confidentiality]

Accelerated Storage Addition Program (ASAP) Quarterly Status Update

Exhibit 1

October 30, 2026



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1.0 Executive Summary

During the reporting period, Puerto Rico's electric system continued to experience generation constraints associated with limited generation availability and outages at several generating units. These conditions underscore the importance of the ASAP program and its objective of deploying battery energy storage capacity to enhance grid reliability, increase operational flexibility, and reduce load shedding.

This section outlines the ASAP program's scope and objectives and highlights recent advancements that demonstrate its strategic value for Puerto Rico. The reporting period covers July through September 2026; however, certain activities and developments that occurred outside this timeframe are referenced where relevant to the topics discussed.

The ASAP program is designed to add battery energy storage to Puerto Rico's electric grid, enhancing resiliency, operational flexibility, and progress toward clean energy goals. Through ASAP, LUMA will collaborate with Independent Power Producers (IPPs) to deploy energy storage solutions at existing power generation sites across the island. This strategic deployment is expected to provide critical energy dispatch during peak demand periods and emergency events, helping to reduce load shedding.

ASAP provides a Standard Offer (SO) framework for the installation of Battery Energy Storage System (BESS) capacity at qualified IPP facilities through two agreement structures. SO1 applies to IPPs currently delivering energy under a Power Purchase and Operating Agreement (PPOA) with an active Point of Interconnection (POI), while SO2 applies to IPPs with executed PPOAs with the Puerto Rico Electric Power Authority (PREPA) that remain under development. By increasing battery storage capacity, ASAP supports load shed reduction, strengthens system reliability, and delivers cost savings through standardized pricing and contractual terms.

ASAP is a first-of-its-kind program developed in collaboration with the utility-scale industry to support the integration of Battery Energy Storage Systems (BESS) into Puerto Rico's electric grid. The ASAP SO, as an innovative commercial approach, has required extensive technical evaluation and stakeholder coordination to ensure compliance with contractual terms and interconnection standards.

The timeline has been influenced by several factors inherent to the deployment of a new technology at scale. Project development has required significant information exchanges and multiple rounds of technical review to address project-specific considerations. Progress has also depended on the timely completion of contractual signing conditions by project developers and the submission of technical data, models, and responses necessary to support engineering and interconnection studies. These activities are essential to validating the safe and reliable integration of BESS resources into Puerto Rico's electric system.

Procurement and contracting constraints associated with securing and maintaining the specialized engineering and technical support resources required for program implementation have also influenced the schedule. While these factors have extended the timeline beyond initial expectations, they have not changed the program's objective of establishing a robust framework for the accelerated deployment of energy storage.

Throughout the process, LUMA Energy has worked closely with developers by providing technical information, responding to requests, supporting data exchanges, and facilitating discussions to help

advance project development while ensuring the long-term reliability and resilience of the electric system.

To date, ten (10) SO1 agreements, representing a total of 594.4 MW of BESS capacity, have been approved by the Energy Bureau, PREPA, and the Financial Oversight and Management Board (FOMB). In July 2026, three resource providers executed the Standard Offer with PREPA, increasing the total number of fully executed SO Agreements to six. The remaining four participants are in the process of completing the required signing conditions. Table 1 summarizes the status of all ASAP projects. LUMA will provide the support necessary to complete the signing conditions for the remaining four approved SO1 projects; however, primary responsibility for this effort rests with PREPA and the respective participants.

LUMA provided to all SO1 participants a preliminary Large Generator Interconnection Agreement (LGIA) during CY Q1 2026 for their review. One participant has signed the LGIA while others are undergoing discussions and reviews to address site-specific requirements and associated cost determinations. In addition, LUMA continued collaboration with SO1 participants focused on addressing outstanding Agreed Operating Procedures (AOP) items and further refining select procedures. The final AOP has been shared with one participant, awaiting execution, although not required until 270 days after SO Closing Date. Reviews continue to be held with other participants regarding their corresponding AOPs.

Facility Studies and System Impact Studies for SO1 Phase 1 were completed. The collection of required information for the SO1 Phase 2 studies, including Interconnection Application Forms (IAFs) and Power System Simulator for Engineering (PSSe) models, was initiated. Several participants still need to provide updated IAFs and PSSe models before the studies can commence.

Table 1: Summary of ASAP projects status[1]

	EXPRESSED INTEREST	POTENTIAL 4-HR CAPACITY (MW)	REGULATORY APPROVAL STATUS
SO1 Qualified Participants: 44	**10**	**594.4**	**In Process**
SO1 Phase 1 Participants (The original 6 participants prior to extending SO1 offer to Phase 2 participants.)	6	259.4	4 executed their SO with PREPA 2 pending Resource Provider signing conditions or SO execution
SO1 Phase 2 Participants (Phase 2 participants who agreed to participate in SO1 without reservations)	4	335	2 executed the SO with PREPA 2 pending Resource Provider signing conditions or SO execution
SO2 Qualified Participants: 31	**7**	**343**	**Not Started**

[1] Precise number of interested parties and MW capacity subject to changes as each project is assessed in detail.

2.0 Project Status

This section summarizes the progress during the July to September 2026 quarter, including developments related to the formal Docket and regulatory approval process, as well as broader ASAP Program Plan activities.

2.1 Docket Key Activities

No docket activity occurred under Docket NEPR-MI-2024-0002 during the reporting period. As a result, there are no docket-related updates to report for this quarter.

2.2 Schedule Impacts

The following list summarizes several activities that have affected the overall project schedule status during this quarter.

1. *Participant Delays in Meeting Signing Conditions* – As of September 30, 2026, six participants met and submitted the required signing conditions. Of the two remaining Phase 1 participants, one is close to completing the requirements, but the other remains outstanding.

2. *Delays in Participant's Compliance with RFI Delivery* – Delays occurred due to incomplete technical information in the PSSe models provided by SO1 participants, which required additional clarification and requests to obtain the correct information. This issue was raised in the previous quarterly reports.

3. *LUMA Support related delays* – ASAP program activities experienced schedule impacts due to unavailability of third-party specialized support services. These impacts contributed to an approximately eight-week extension to the timeline for selected activities, including AOP development, RFI responses, engineering studies, and other program support functions.

2.3 Program Progress

Table 2 below summarizes activities completed by the ASAP team according to the four categories from the ASAP Implementation Program Plan.

Table 2: ASAP Program Plan Progress

CATEGORY	KEY TASKS COMPLETED SINCE LAST UPDATE
Standard Offer Agreement Coordination	**SO1 Coordination:** • **SO1 Phase 1 Participants,** consists of 6 projects which represent 259.4 MW of 4-hour BESS capacity. Two were executed on April 7,2026, and June 5, 2026. Since then, two more have been executed on July 31, 2026. The remaining two have been approved by the Energy Bureau, PREPA, and FOMB and are pending submission of Signing Conditions by the Resource Provider to PREPA. • **SO1 Phase 2 Participants**, consists of 4 projects which represent 335 MW of 4-hour BESS capacity were approved by PREPA on February 19, 2026, and FOMB on May 8, 2026. Two were executed by PREPA on June 8, 2026,

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CATEGORY	KEY TASKS COMPLETED SINCE LAST UPDATE
	and July 2, 2026. The remaining 2 are pending submission of Signing Conditions by the Resource Provider to PREPA. **General:** • An ASAP LGIA has been shared with all Participants and will be executed as part of the Conditions Precedent of the SO. In addition, for existing facilities that do not currently have an executed LGIA, a legacy interconnection agreement will be required to formalize the terms and conditions of interconnection with the T&D System. This approach enhances transparency, clarifies responsibilities between the parties, and supports the continued reliability and operational integrity of the electric grid.
Developer Coordination	**Interconnection Feasibility Studies:** • LUMA performed Cluster System Impact Studies (SIS) on April 9, 2026. Planning provided ASAP BESS project's Interconnection Studies Summary Report on April 24, 2026. • Several updates were requested from SO1 Phase 1 participants dynamic PSSe models to finalize MTR Compliance report. Three out of six participants have complied. • Facility Studies performed by the A&E firm for all Transmission Centers have been received by LUMA. • Delays occurred due to incomplete technical information in the PSSe models provided by SO1 participants. • Interconnection Application Forms and PSSe models have been requested from SO1 Phase 2 participants to commence Phase 2 SIS. • One SO1 Phase 2 participant has provided the requested updated PSSe model and Interconnection Form. The remaining 3 participants are pending to send their updated PSSe models, and two of those are also pending to send the updated Interconnection Application Form.
System Operations Interface	**Agreed Operating Procedures (AOP)** • An execution version of the AOP has been finalized and sent to the SO1 Phase 1 Participants who have met their SO closing date. Comments from other Participants continue to be received and reviewed to incorporate in their corresponding AOPs. • Meetings were held with two of these participants to discuss their feedback and align on the necessary changes.
Program Management	• Prepared and filed the quarterly update with the Energy Bureau for October 2026. • Continued the preparation of monthly updates for the Stabilization Plan (NEPR-MI-2024-0005) docket. • Tracked expenses and prepared reports for the quarterly PPCA filing under the Permanent Rate Docket, Case No.: NEPR-MI-2020-0001.

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3.0 Project Timeline

This section provides an overview of the project timeline, including progress toward key program milestones and status of activities by the Standard Offer participant group. Table 4 lists the overall program milestones and the current status for SO1 Phase 1 and SO1 Phase 2 Participants.

Table 3: ASAP Program Milestones

The following table illustrates the status of the Standard Offer 1 (SO1) projects, totaling 594.4 MW of BESS

#	Task	[redacted] (20 MW)	[redacted] (18 MW)	[redacted] (50 MW)	[redacted] (20 MW)	[redacted] (71.4 MW)[1]	[redacted] (80 MW)[1]	[redacted] (125 MW)	[redacted] (120 MW)[1]	[redacted] (40 MW)	[redacted] (50 MW)
1	**Standard Offer (SO) Agreement Status**										
1.1	Receive Developer's Information for SO	10/18/2024	10/16/2024	10/16/2024	10/17/2024	2/26/2025	2/24/2025	10/31/2025	10/31/2025	10/29/2025	10/31/2025
1.2	Submit Draft SO to Energy Bureau	10/18/2024	10/18/2024	10/18/2024	10/18/2024	N/A	N/A	11/3/2025	11/3/2025	11/3/2025	11/3/2025
1.3	Submit Finalized SO to Energy Bureau	12/23/2024	11/12/2024	11/12/2024	11/12/2024	8/5/2025	9/10/2025	11/10/2025	11/10/2025	11/10/2025	11/10/2025
1.4	Approval of SO by Energy Bureau	1/14/2025	12/20/2024	12/20/2024	12/20/2024	8/8/2025	9/17/2025	11/13/2025	11/13/2025	11/13/2025	11/13/2025
1.5	Approval of SO by PREPA	4/30/2025	12/26/2024	12/26/2024	2/19/2025	2/19/2026	2/19/2026	2/19/2026	2/19/2026	2/19/2026	2/19/2026
1.6	Approval of SO by FOMB	1/28/2026 (conditionally approved)	3/24/2025	3/24/2025	3/24/2025	5/8/2026 (conditionally approved)	5/8/2026 (conditionally approved)	5/8/2026	5/8/2026	5/8/2026	5/8/2026
1.7	Approval of SO by P3A	P3A has autorized execution of SO's by PREPA and Resource Providers in letter dated 6/20/2025.									
1.8	Complete Signing Conditions	10/2/2025	5/31/2026	5/31/2026	In Progress	5/20/2026	In Progress	In Progress	6/4/2026	In Progress	5/31/2026
1.9	Execution of SO	4/7/2026	7/31/2026	7/31/2026	Not Started	6/5/2026	Not Started	Not Started	6/8/2026	Not Started	7/2/2026
1.10	Completion of Conditions Precedent/Closing Date[2] (180 days after SO Execution)	10/2/2026	Due: 1/27/2027	Due: 1/27/2027		Due: 12/2/2026			Due: 12/8/2026		Due: 12/29/2026
2	**Engineering, Procurement, and Construction (EPC)**	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started	Not Started
3	**Initial Synchronization Date[2]**	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027	12/1/2027
4	**Commercial Operation Date (COD)[3]**	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027	12/31/2027

NOTES:
[1] These projects have been approved with Expanded Capacity and are reported using a 4-hour equivalent basis.
[2] Estimated dates are preliminary and may be adjusted as project timelines are refined.
[3] SO Agreement specifies a long-stop date of January 1, 2028. COD can occur prior to 12/31/2027.

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4.0 Expenditures incurred to date

Expenditure through September 2026 totaled approximately $6,043,846.

The table below provides a breakdown of the estimated costs incurred to date. The actual invoiced amounts are reported quarterly through Permanent Rate Docket NEPR-MI-2020-0001.

Table 6: ASAP Incurred Expenditures to Date (amounts shown for the month when services were performed)

$	Through Dec 2025	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026	Program Total
Legal	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Consultant (Incl. Other, Engineering)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total Actuals	4,859,322	138,409	107,844	25,961	162,993	248,557	238,066	57,076	183,073	22,545	Not Invoiced	Not Invoiced	Not Invoiced	6,043,846
Quarterly				272,214			649,616			262,694			0	