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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 Remaining Responses to the Requirements of Information in Compliance with Resolutions and Orders Dated September 18, 2026 and October 16, 2026.

MOTION TO SUBMIT REMAINING RESPONSES TO THE REQUIREMENTS OF INFORMATION IN COMPLIANCE WITH RESOLUTIONS AND ORDERS DATED SEPTEMBER 18, 2026 AND OCTOBER 16, 2026

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 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

[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.

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

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

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. On October 8, 2026, Genera filed a motion titled *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* ("October 8 Motion"), through which Genera submitted, as Exhibit A, 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, in response to Requirements 3, 5, 6, 7, and 8 of the September 18 Order. In the October 8 Motion, Genera also requested an extension of twenty (20) calendar days, until October 28, 2026, to submit the responses to the remaining Requirements 1, 2, 4, 9, 10, 11, and 12.

9. On October 16, 2026, the Energy Bureau issued a Resolution and Order ("October 16 Order"), through which, *inter alia*, it granted Genera's request for an extension of time.

10. On October 28, 2026, Genera filed a motion titled *Motion to Submit Additional Responses to the Requirements of Information in Compliance with Resolutions and Orders Dated*

September 18, 2026 and October 16, 2026, and Request for Extension of Time ("October 28 Motion"), through which Genera submitted, as Exhibit A, its responses to Requirements 2, 4, 9, 11, and 12 of the September 18 Order and an update to its response to Requirement 6 submitted with the October 8 Motion ("Second Supplemental Q4 Report"), together with Exhibits 1 and 2. In the October 28 Motion, Genera also requested an additional extension of five (5) business days, until November 4, 2026, to submit its responses and supplement the remaining Requirements 1, 3, 5, 8, and 10 of the September 18 Order.

11. In compliance with the September 18 Order and the October 16 Order, and within the term requested in the October 28 Motion, Genera respectfully submits, as **Exhibit A** to this Motion, its responses to the remaining Requirements 1, 3, 5, 8, and 10 of the September 18 Order ("Supplemental Responses"), together with the supporting Exhibits 1 through **4** referenced therein.

12. As detailed below, the Supplemental Responses and their supporting exhibits address the following:

(i) the plan to reduce Forced Outages to fifteen percent (15%), including the principal causes of the outages, the units contributing most significantly to the indicator, and an indicative timeframe for the 15% target (Requirement 1);

(ii) the fleet-wide monthly availability and outage indicators for Fiscal Year 2026, with EFOR presented separately from the factors that add to period hours, and their reconciliation with the unit-level data submitted with the October 8 Motion (Requirement 3; *see* **Exhibit 1**);

(iii) the effect of the availability of Consumables, Spare Parts, and Capital Spare Parts on the forced outage events of the fourth quarter of Fiscal Year 2026,

the units with two or more events attributable to the same system or component during Fiscal Year 2026, with the available root cause analyses and the changes made to the maintenance program, including new or revised preventive maintenance tasks (Requirement 5; *see* **Exhibits 2, 3, and 4**);

(iv) the preventive maintenance work orders scheduled and completed, the preventive and corrective maintenance backlog, the ratio of corrective to preventive work, and the condition-monitoring findings converted into work orders, by plant, and the use of that information (Requirement 8); and

(v) the status of each unit out of service for more than thirty (30) days or operating with a capacity limitation greater than ten percent (10%) of its nameplate capacity, including the contract awarded to the original equipment manufacturer for Aguirre Unit 1 (Requirement 10).

13. Genera further informs that, as ordered in the September 18 Order, it will incorporate Requirements 1 through 12, together with the corresponding compliance matrix, in its quarterly reports beginning with the report for the first quarter of Fiscal Year 2027.

14. Lastly, Exhibit 4 contains confidential information. Accordingly, pursuant to the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, Genera respectfully requests that Exhibit 4 be kept confidential and under seal. Genera respectfully informs that it will submit a Memorandum of Law supporting its request for confidentiality within the next ten (10) days.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **accept** the Supplemental Responses submitted as Exhibit A herein, together with Exhibits 1 through **4**; **deem** Genera in full compliance with the September 18 Order with

respect to the Requirements addressed herein; and **grant** confidential treatment to Exhibit 4 and maintain it under seal.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of November 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.

ECIJA SBGB
PO Box 363068
San Juan, Puerto Rico 00936
Tel. (787) 300.3200
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo
jfernandez@ecija.com
TSPR 9,669

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso
jdiaz@ecija.com
TSPR 21,718

/s/ Ernesto Raúl Ramos Maldonado
Ernesto Raúl Ramos Maldonado
eramos@ecija.com
TSPR 23,882

Exhibit A

Responses to Requirements 1, 3, 5, 8, and 10 of the 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

1. A specific plan to achieve the target of reducing Forced Outages to fifteen percent (15%). The plan shall identify the principal causes of the outages, the units contributing most significantly to the indicator, corrective and preventive measures, the expected quantified effect, and an implementation schedule, including the revised date by which Genera expects to achieve the target and, for each unit whose Fiscal Year 2026 forced outage factor exceeded fifteen percent (15%), the specific measures and dates applicable to that unit.

Response:

The fleet Forced Outage Factor (FOF) for Fiscal Year 2026 was 29.3%, 14.3 percentage points above the 15% target. It is the FOF of the 51 units in Exhibit 1 of Genera's October 8, 2026 filing, including peaking and temporary units, weighted by tested capacity.

Twenty-three units had an FOF above 15% and accounted for 25.1 of the 29.3 points. Aguirre 1, out of service for the full year, accounted for 11.3 points by itself. For long-term planning purposes, Genera has identified Fiscal Year 2030 as an indicative timeframe for pursuing the established 15% fleet-wide FOF target, subject to the operational limitations and assumptions discussed in Section D.

Since assuming operations on July 1, 2023, Genera has encountered numerous equipment failures, unexpected operational limitations, and previously unidentified deficiencies affecting the reliability and availability of the legacy generation fleet. The age, deteriorated condition, and operational history of these assets present significant

challenges in reducing forced outages, as equipment failures may occur without prior indication and additional deficiencies may only become apparent during inspections, maintenance activities, or repair work. Also, the Rate Case determination eliminated multiple projects and significantly reduced budget amounts to perform preventive maintenances that may significantly affect the FOF. Also, the lack of reserve generation in the system also makes it difficult to take units out of service to perform preventive maintenance.

Nevertheless, Genera continues to implement corrective and preventive measures through its Unit Maintenance Plan, including major equipment repairs, component replacements, inspections, and other reliability improvement initiatives intended to address the principal causes of forced outages and progressively improve fleet-wide reliability.

As previously explained in Genera's response to Item #12 of its October 28, 2026 filing, forced outages are inherently unpredictable events. Although historical performance data may provide insight into past operating conditions, such information does not allow Genera to reliably determine when future equipment failures will occur, which generating units will be affected, the extent of the resulting damage, or the duration of the corresponding outages. Accordingly, while Genera can identify the corrective and preventive measures intended to reduce forced outages, the actual impact of these initiatives on future fleet wide FOF cannot be reliably determined in advance.

The following section identifies the principal causes of forced outages, the affected generating units, the corrective and preventive measures being implemented, their anticipated schedules, and the potential quantified effects under specified planning assumptions.

A. Principal causes of forced outages

Table 1-1 groups the 23 units above 15% by the principal cause of their forced outage hours.

Table 1-1. Contribution to the Fiscal Year 2026 fleet FOF, by principal cause

Principal cause	Units (FY2026 FOF)	Contribution to fleet FOF (percentage points)
Generator failures	Aguirre 1 (100%); Palo Seco 4 (30.5%)	13.0
Combustion turbine and engine failures in peaking units	Cambalache 3 (72.9%); Mayagüez 1 to 4 (46.6% to 96.4%); Palo Seco FT-8 MP 2 and MP 3 (38.5% and 24.1%)	5.2
Temporary generation units	San Juan TM 1, 4, 8 and 9; Palo Seco TM 1, 3 and 4 (34.0% to 100%)	2.9
Steam cycle auxiliaries (condenser circulating water)	Aguirre Combined Cycle steam unit 1 (99.7%)	2.4
Aging gas turbines proposed for retirement	Palo Seco 1-1 and 2-1; Daguao 1-1 and 1-2; Jobos 1-2 (26.8% to 100%)	1.5
Outage not authorized as planned and recorded as forced	San Juan 5 steam unit (15.3%)	0.2
Units above 15%	23 units	25.1
Units at or below 15%	28 units	4.2
Fleet	**51 units**	**29.3**

Source: Exhibit 1 of Genera's October 8, 2026 filing.

Aguirre 2, Costa Sur 5, San Juan 9 and Palo Seco 3 stayed below 15% (10.3%, 9.7%, 7.8% and 6.1%). Their boiler pressure-part failures are, however, the most frequent repeat events and are addressed in the responses to Items 5 and 9.

Although these historical results identify the units and equipment systems that contributed most significantly to the Fiscal Year 2026 FOF, they do not necessarily predict which units will experience forced outages in subsequent periods. The identification of recurring failure mechanisms allows Genera to prioritize corrective and preventive maintenance activities; however, the possibility of previously unidentified deficiencies and unexpected equipment failures remains an inherent limitation of the Legacy Generation fleet.

B. Units with a Fiscal Year 2026 FOF above 15%

Table 1-2 lists, for each unit above 15% other than the seven temporary units, the measures and dates that apply to it.

Table 1-2. Units with a Fiscal Year 2026 FOF above 15%: measures and dates

Unit	FY2026 FOF	Share of fleet tested capacity	Principal cause	Corrective and preventive measures	Dates
Aguirre 1	100%	450 MW / 3,982 MW = 11.3%	Catastrophic generator failure (February 14, 2025); the negotiation of the repair contract with the original equipment manufacturer and the availability of spare parts delayed the start of the repairs.	Generator stator and rotor rewind ($8.4 million) and stator repair ($9.6 million) by the original equipment manufacturer ($18.0 million in total); spare rotor rewind for Units 1 and 2 ($5.1 million); federal funds	Started February 17, 2026; generator repairs completed by March 2027; return to service in Q4 FY2027
Aguirre Combined Cycle steam unit 1	99.7%	96 MW / 3,982 MW = 2.4%	Condenser circulating water pump and condenser findings	Pump repair; parts delivery pending	Return to service in Q4 FY2027
Cambalache 3	72.9%	75 MW / 3,982 MW = 1.9%	Turbine failure	Major turbine repair (DOE funds), returned to service March 10, 2026; Inspection C of Units 2 and 3 ($37.1 million, federal funds). The procurement process for the major inspection delayed the return-to-service date.	Inspection C: October 15, 2025 to December 31, 2026

Unit	FY2026 FOF	Share of fleet tested capacity	Principal cause	Corrective and preventive measures	Dates
Mayagüez 1, 2, 3 and 4	67.2%	202 MW / 3,982 MW = 5.1%	Engine failures, including failed performance tests of Unit 4A after repair	Unit 2A turbine and compressor repairs (about $10 million, DOE funds); Unit 4A inspection ($0.9 million) and combustor repairs for Units 3A and 2B ($0.5 million each), federal funds; rotor exchange that returned Unit 3B to service in June 2026; funding requested for the Unit 3B rotor repair	Unit 2A: November 2026; Unit 4A: Q4 FY2027; Units 1A and 1B and the Unit 3B rotor repair: to be determined, pending funding
Palo Seco 4	30.5%	216 MW / 3,982 MW = 5.4%	Generator failure (out of service until September 16, 2025; rotor failure September 17 to 26, 2025); boiler tube leaks (April and May 2026); boiler air leak limiting the unit since August 2026	Rotor repair, full stator rewind and new air preheater baskets (completed); boiler tube repairs; superheater header No. 5 replacement ($1.2 million, procurement); boiler air leak repair (in progress); environmental inspection.	Repairs completed September 2025; full capacity in December 2026; environmental inspection due March 15, 2027
San Juan 5 steam unit	15.3%	52 MW / 3,982 MW = 1.3%	Combustion inspection recorded as forced (November 19 to December 16, 2025) because the outage was not authorized as planned	Coordination of planned outages with LUMA; condenser cleaning system replacement ($3.5 million, federal funds)	Condenser cleaning system by June 30, 2027

Unit	FY2026 FOF	Share of fleet tested capacity	Principal cause	Corrective and preventive measures	Dates
Palo Seco FT-8 MP 2 and MP 3	38.5% and 24.1%	54 MW / 3,982 MW = 1.4%	Lubricating oil system failures (MP 2, January to June 2026); combustor replacement (MP 3, April 2026); MP 3 out of service since August 2026 after a high-pressure trip at sensor PDT629A	Lubricating oil pump motor replacements and troubleshooting of the lubricating oil system (MP 2); combustor replacement (MP 3, completed); major repair of MP 3, pending funding	MP 2: not yet estimated; MP 3: to be determined, pending funding
Gas turbines proposed for retirement: Palo Seco 1-1 and 2-1; Daguao 1-1 and 1-2; Jobos 1-2	26.8% to 100%	103 MW / 3,982 MW = 2.6%	Palo Seco 1-1: high vibration on bearing 1 (since July 2025); Palo Seco 2-1: out of service since January 2025; Daguao and Jobos: main power transformer ground faults and starting, lubricating oil and fuel system failures	Repair contracts for Palo Seco 1-1 and 2-1 (about $0.5 million each); corrective repairs at Daguao and Jobos; retirement proposed in the Integrated Resource Plan upon entry of the new peaking units (Section E)	Palo Seco 1-1: repair completed; Palo Seco 2-1: December 2027; retirement: upon entry of the new peaking units

Source: Exhibits 1 and 3 of Genera's October 8, 2026 filing; Genera's quarterly report of August 14, 2026; Genera's repair status report of August 19, 2026 in Case No. NEPR-MI-2021-0004; Attachment 5 of Genera's Fiscal Year 2026 quarterly reports; the monthly maintenance report as of September 30, 2026 (Exhibit 1 of Genera's October 28, 2026 filing); and Table 10-1.

The anticipated completion dates identified above represent current maintenance and repair planning estimates rather than guaranteed return-to-service dates. As demonstrated by Genera's operational experience, additional equipment deficiencies may be discovered during inspections or repair activities, and unexpected complications during testing and commissioning may require further corrective work. Moreover, the lack of available funding or delays in securing the necessary financial resources may affect the procurement of replacement parts, the execution of repair contracts, and the timely completion of maintenance and repair activities. Consequently, the actual completion dates and corresponding effects on unit

availability remain subject to change.

Furthermore, the successful return to service of an individual generating unit does not necessarily guarantee sustained availability or prevent subsequent forced outages, particularly where other aging components or auxiliary systems remain susceptible to failure. In addition, funding constraints may limit Genera's ability to undertake additional corrective or preventive maintenance activities necessary to address existing equipment deficiencies and improve long-term reliability.

C. Corrective and preventive measures

Corrective. The unit repairs in Table 1-2 and in Table 10-1 (Item 10), and the critical component replacement program funded by FEMA. Of that program's budget of $124.9 million, as adjusted in the amendment requested from FEMA in October 2026, $80.0 million has been committed and $34.3 million remains pending award (Item 4).

Preventive. Genera will continue applying the following measures to the systems with repeat failures:

- Boiler tube thickness surveys and non-destructive examination in planned outages of the steam units, as access, funding, and outage conditions allow, with tube replacements scheduled from the results (Item 9).
- Condition monitoring (vibration, infrared thermography and lubricating-oil analysis) converted into work orders before failure (Item 8).
- Completion of past-due major and environmental inspections in the Unit Maintenance Plan (Items 7 and 11).
- Staging of Spare Parts and Capital Spare Parts for the systems with repeat failures.
- New peaking units and battery storage at Genera's sites, expected to enter service between 2027 and mid-2028 (Section E).

These corrective and preventive measures are intended to address identified equipment deficiencies, reduce recurring failures, and improve the operational reliability of the generation fleet. In particular, targeted inspections, condition monitoring, and preventive maintenance activities allow Genera to identify certain

deteriorating conditions and implement corrective actions before they result in equipment failures.

Nevertheless, the effectiveness of these measures remains subject to the condition and operational history of each generating unit. While preventive maintenance may reduce the likelihood of certain failures, it cannot eliminate the risk of unexpected equipment damage or previously unidentified deficiencies. Furthermore, the lack of available funding presents an additional challenge, as financial constraints may delay or limit the implementation of necessary corrective and preventive measures, including equipment repairs, component replacements, and other reliability improvement initiatives. Accordingly, Genera will continue to evaluate the condition of its generating assets and adjust its maintenance and repair priorities based on inspection findings, operational requirements, and available resources.

D. Expected quantified effect and implementation schedule

Table 1-3 s presents an illustrative analysis of the potential effects of the identified corrective measures on the Fiscal Year 2026 fleet-wide FOF. For purposes of this analysis, each repaired unit is assumed to operate for a full fiscal year at a 10% FOF, using the Fiscal Year 2026 performance of Aguirre 2 (10.3%) and Costa Sur 5 (9.7%) as reference points. The analysis further assumes that all other units maintain their Fiscal Year 2026 performance levels and that the identified retirements occur as contemplated.

Genera emphasizes that these assumptions are intended solely for illustrative planning purposes and do not constitute forecasts of actual post-repair performance. In particular, the assumed 10% FOF does not establish that any repaired unit will achieve or sustain that performance level, as the operational condition, maintenance history, and remaining deficiencies of each generating unit may differ significantly.

The potential effects presented in Table 1-3 are contingent upon the successful competition of the identified repairs, the assumed operating performances following their completion, and the implementation of the applicable fleet changes. Given the age and deteriorated condition of the Legacy Generation Assets, these illustrative reductions should not be interpreted as expected or guaranteed reductions in future

FOF.

Repairs to critical components improve the reliability of the fleet; however, auxiliary components that are not replaced remain exposed to failures and performance gaps.

As previously explained in Genera's response to Item #12 of its October 28, 2026 filing, improvements achieved through maintenance and repair initiatives do not necessarily translate into sustained increases in fleet-wide availability or corresponding reductions in forced outages. The successful restoration of one generating unit may be offset by an unexpected, forced outage or capacity limitation affecting another unit. Moreover, unforeseen equipment conditions, hidden damage, or additional deficiencies may only become apparent during inspections, repairs, testing, or commissioning activities, potentially requiring additional work, resources, and time.
Furthermore, the implementation schedules remain subject to funding availability, applicable regulatory approvals, procurement requirements, replacement parts, specialized contractors, and coordination with LUMA, as System Operator. These factors may affect the timing of maintenance and repair activities and, consequently, the realization of any anticipated operational improvements.

Table 1-3. Expected effect on the fleet FOF (full fiscal year)

Measure	Units	Completion	Effect (points)
Starting point: Fiscal Year 2026 fleet FOF of 29.3%	51 units	—	—
Generator repair and return to service	Aguirre 1	Q4 FY2027	-10.2
Pump repair and return to service	Aguirre Combined Cycle steam unit 1	Q4 FY2027	-2.2
Full year of operation after completed repairs	Cambalache 3 and Palo Seco 4	Cambalache 3: March 2026; Palo Seco 4: December 2026	-2.3
Engine repairs	Mayagüez 1 to 4	Unit 2A: November 2026; Unit 4A: Q4 FY2027; Units 1A and 1B: to be determined	-2.9

Measure	Units	Completion	Effect (points)
Retirement of aging gas turbines (proposed Integrated Resource Plan)	Palo Seco, Daguao and Jobos	Upon entry of the new peaking units (2028)	-1.2

Illustrative effect: calculated reduction in fleet-wide FOF, expressed in percentage points, under the stated planning assumptions and when each measure is added to the preceding measures. These calculations do not constitute forecasts of actual future FOF performance.

For long-term planning purposes, Genera has identified Fiscal Year 2030 as an indicative timeframe for pursuing the established 15% fleet-wide FOF target. This timeframe considers the anticipated completion of major maintenance and repair initiatives, including the restoration of Aguirre 1, the potential entry into service of new peaking units and battery storage systems, and the proposed retirement of certain legacy gas turbines, as discussed in Section E.

However, Genera respectfully emphasizes that identifying a long-term planning objective is fundamentally different from reliably forecasting when a particular FOF target will actually be achieved. As explained in its previous response to Item #12, forced outages are inherently unpredictable, and their occurrence, frequency, severity, and duration cannot be reliably established in advance. This uncertainty is further compounded by the lack of adequate funding, which limits Genera's ability to proactively address equipment deficiencies and implement preventive maintenance and reliability improvements in a timely manner. Given these financial constraints, Genera must prioritize maintenance and repair activities based on the immediate needs of the electrical system, operational emergencies, and the availability of resources, rather than solely on long-term reliability objectives. With sufficient funding, Genera would be better positioned to address deteriorating equipment conditions more promptly, implement preventive measures, and potentially avoid certain equipment failures before they result in forced outages. However, under the current funding limitations, the timing and scope of these activities remain uncertain, further complicating any reliable projection of future FOF performance. Consequently, Genera cannot reasonably guarantee that the 15% target will be achieved in Fiscal Year 2030 or any other predetermined period.

Accordingly, the illustrative calculations presented in Table 1-3 should be considered

in conjunction with the significant operational uncertainties affecting the legacy generation fleet. Genera will continue implementing its Unit Maintenance Plan, monitoring actual operating performance, and adjusting its maintenance and repair priorities as necessary to pursue sustained improvements in generation reliability and availability.

E. Fleet changes under the proposed Integrated Resource Plan

LUMA's proposed 2025 Integrated Resource Plan, which the Energy Bureau found complete on February 13, 2026 and continues to evaluate in Case No. NEPR-AP-2023-0004, assumes the retirement of seven legacy gas turbines (147 MW) at Jobos, Daguao, Palo Seco and Yabucoa in 2026 and 2027, conditioned on the entry of Genera's new peaking units. It also includes 244 MW of new peaking units and 430 MW of battery storage at Genera sites.

Genera is developing new peaking units and battery storage at its sites under FEMA Project 164988 (Generation Fleet – BESS and Peakers). Genera expects the battery storage systems to enter service during 2027, starting with Cambalache in the first quarter, and the new peaking units between the fourth quarter of 2027 (Costa Sur) and mid-2028 (Yabucoa, Jobos and Daguao). Their entry is a condition for the gas turbine retirements in Table 1-4, which would therefore take place later than the years shown in the plan. Table 1-3 does not quantify the effect of the new resources, but Genera's Fiscal Year 2030 target date assumes that they will be in operation.

These anticipated fleet changes are relevant to Genera's long-term planning considerations because the introduction of new generation resources and the potential retirement of aging units may affect fleet composition, maintenance requirements, and overall operational reliability. Nevertheless, the timing and implementation of these initiatives remain subject to the applicable approval processes, funding availability, project execution, and successful commissioning of the replacement resources.

Table 1-4. Retirements assumed in the proposed Integrated Resource Plan, 2026 to 2030

Year	Unit (plan designation)	Plant	Capacity (MW)	Genera designation (October 8 filing, Exhibit 1)	FY2026 FOF
2026	Gas turbine GT20	Jobos	21	Jobos 1-2	26.8%
2026	Gas turbine GT21	Daguao	21	Daguao 1-1	30.3%
2026	Gas turbine GT22	Daguao	21	Daguao 1-2	30.4%
2027	Gas turbine GT01	Palo Seco	21	Palo Seco 1-1	94.2%
2027	Gas turbine GT02	Palo Seco	21	Palo Seco 1-2	6.2%
2027	Gas turbine GT03	Palo Seco	21	Palo Seco 2-1	100%
2027	Gas turbine GT12	Yabucoa	21	Not in Exhibit 1	—
2029	Emergency temporary generation	Several	800	Not in Exhibit 1	—
2030	Palo Seco 4	Palo Seco	200	Palo Seco 4	30.5%
2030	San Juan 7	San Juan	100	San Juan 7	0.7%

Source: LUMA's proposed 2025 Integrated Resource Plan, Case No. NEPR-AP-2023-0004, Section 10.1.2, Table 109. The plan conditions the gas turbine retirements on the entry of the new peaking units, and the 2030 retirements on a later resource adequacy analysis. FY2026 FOF: Exhibit 1 of Genera's October 8, 2026 filing. Table 1-3 includes the effect of the proposed gas turbine retirements (1.2 points). The added reserve from the new resources would also let LUMA authorize planned outages that it now defers for reserve reasons. Because the plan has not been approved, these are planning assumptions.

Genera emphasizes that the proposed retirement dates and associated fleet changes remain preliminary planning assumptions, as the applicable Integrated Resource Plan has not yet been approved. Consequently, Genera cannot reliably determine the extent to which these proposed changes will affect future fleet-wide FOF or establish that their implementation will result in achievement of the 15% target within a specific timeframe.

Nevertheless, Genera remains committed to implementing the corrective and preventive measures identified herein, addressing the principal causes of forced outages, and pursuing improvements in the reliability and availability of the legacy generation fleet. Genera will continue to report actual performance indicators and provide updates regarding maintenance activities, unit availability, and operational

limitations through its established regulatory reporting obligations.

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:

In continuation of Genera's response to Requirement 3 submitted on October 8, 2026, please refer to Exhibit 1 for the fleet-wide monthly performance indicators for Fiscal Year 2026, including EAF, FOF, EOF, POF, MOF, and EFOR. Exhibit 1 replaces Exhibit 2 of Genera's October 8, 2026 filing. In Exhibit 1, EAF, POF, MOF, FOF, and EOF add to 100% of period hours, and EFOR is presented separately as a rate, not as a component of period hours. The fleet-wide indicators in Exhibit 1 correspond to the totals of the unit-level data in Exhibit 1 of Genera's October 8, 2026 filing.

Variations in these performance indicators are primarily attributable to the changing operational conditions and availability of individual generating units. These variations may result from forced outages, scheduled and unscheduled maintenance activities, equipment failures, capacity deratings, and operational limitations. Additionally, the duration of outages, the extent of repairs required, the availability of replacement parts, and unforeseen conditions identified during inspections may affect the performance indicators reported for each period.

Consequently, the reported indicators may fluctuate significantly between reporting periods, particularly given the age and condition of the Legacy Generation Assets and the recurring maintenance and repair activities required to sustain their operation.

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 of Genera's October 8, 2026 filing 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 of that filing contains the root cause analysis documents referenced in Exhibit 3 of that filing.

Exhibit 2 lists the forced outage events of the fourth quarter of Fiscal Year 2026 that lasted 24 hours or more and states, for each event, whether a Consumable, Spare Part, or Capital Spare Part was needed to return the unit to service, whether it was available in inventory, and whether its availability affected the duration of the event.

Units with two or more events attributable to the same system or component

Genera reviewed the forced outage events of Fiscal Year 2026 reported in Attachment 5 of its quarterly reports for the first three quarters and in Exhibit 3 of Genera's October 8, 2026 filing, and identified 62 cases, in 32 units, in which two or more events (206 in total) were attributable to the same system or component. Table 5-1 lists them. Exhibit 3 lists each of these events by case and states, for each case, whether the events resulted in changes to the maintenance program, such as new or revised preventive

maintenance tasks, and, where they did not, the reason. Exhibit 3 also includes, for the third quarter of Fiscal Year 2026 (January 1 through March 31, 2026), the forced outage events reported in Attachment 5, with the corrective action taken and the root cause analysis document or, where no separate analysis was prepared, an explanation. Events caused by another unit, by equipment outside the plant (including the transmission and distribution system and the fuel supply), or by shared plant equipment that affected three or more units at once were not attributed to the unit, and records that continue the same outage into the next month were counted once. In addition, failures of the isolators in a shared metal-clad cabinet tripped the San Juan temporary units on October 16, 2025 and January 22, 2026; Exhibit 4 includes the root cause analysis of the January 22, 2026 event.

Table 5-1. Units with two or more Fiscal Year 2026 forced outage events attributable to the same system

Unit	System	Events	Forced outage hours
Aguirre 2	Boiler pressure parts	6	583.6
Aguirre 2	Generator, excitation and output bus	4	141.2
Aguirre 2	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	15.6
Aguirre 2	Electrical (breakers, transformers, DC and auxiliary power)	2	162.2
Aguirre CC 1-1	Controls, instrumentation and protection	2	4.8
Aguirre CC 1-2	Controls, instrumentation and protection	4	72.0
Aguirre CC 2-1	Fuel system	11	153.7
Aguirre CC 2-1	Generator, excitation and output bus	5	414.2
Aguirre CC 2-1	Electrical (breakers, transformers, DC and auxiliary power)	2	15.2
Aguirre CC 2-2	Controls, instrumentation and protection	3	47.0
Aguirre CC 2-2	Fuel system	3	33.7
Aguirre CC 2-2	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	2	231.7
Aguirre CC 2-4	Controls, instrumentation and protection	4	5.2
Cambalache 2	Gas turbine combustion, compressor and hot section	2	4.5
Costa Sur 5	Boiler pressure parts	4	381.6
Costa Sur 5	Generator, excitation and output bus	2	16.3

Unit	System	Events	Forced outage hours
Costa Sur 6	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	135.1
Costa Sur 6	Steam and turbine valves	2	274.4
Costa Sur 6	Boiler pressure parts	2	167.9
Daguao 1-1	Electrical (breakers, transformers, DC and auxiliary power)	3	389.1
Daguao 1-1	Fuel system	2	3.3
Daguao 1-2	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	5	162.2
Daguao 1-2	Electrical (breakers, transformers, DC and auxiliary power)	2	77.2
Daguao 1-2	Fuel system	2	72.1
Daguao 1-2	Ignition and flame detection	2	9.8
Jobos 1-2	Starting system	3	793.9
Jobos 1-2	Controls, instrumentation and protection	2	60.0
Mayagüez 2B	Ignition and flame detection	2	21.7
Mayagüez 3A	Controls, instrumentation and protection	5	48.2
Mayagüez 3A	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	4	25.6
Mayagüez 3B	Controls, instrumentation and protection	3	286.9
Mayagüez 4B	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	46.1
Mayagüez 4B	Fuel system	2	25.7
Mayagüez 4B	Turbine bearings, gears and vibration	2	3.2
Palo Seco 1-2	Fuel system	6	96.9
Palo Seco 1-2	Starting system	2	94.2
Palo Seco 1-2	Ignition and flame detection	2	67.7
Palo Seco 3	Boiler pressure parts	3	370.3
Palo Seco 4	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	6	128.3
Palo Seco 4	Boiler pressure parts	4	270.1
Palo Seco 4	Fuel system	2	35.0
Palo Seco MP 1	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	175.2
Palo Seco MP 2	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	308.5

Unit	System	Events	Forced outage hours
Palo Seco MP 3	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	2	206.6
Palo Seco TM 2	Controls, instrumentation and protection	2	16.8
San Juan 9	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	4	298.6
San Juan 9	Boiler pressure parts	2	25.9
San Juan CT 5	Fire protection	3	29.9
San Juan CT 5	Controls, instrumentation and protection	3	10.3
San Juan CT 5	Gas turbine combustion, compressor and hot section	2	893.4
San Juan CT 5	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	2	4.1
San Juan CT 6	Generator, excitation and output bus	5	34.4
San Juan CT 6	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	4	82.5
San Juan CT 6	Turbine bearings, gears and vibration	2	290.0
San Juan ST 5	Turbine bearings, gears and vibration	2	193.2
San Juan TM 2	Controls, instrumentation and protection	11	652.8
San Juan TM 2	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	11	23.2
San Juan TM 4	Controls, instrumentation and protection	2	201.9
San Juan TM 6	Controls, instrumentation and protection	2	1.4
San Juan TM 7	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	2	231.2
San Juan TM 10	Auxiliaries (pumps, fans, cooling, lubrication, hydraulics)	3	39.5
San Juan TM 10	Controls, instrumentation and protection	3	6.4

Unit designations as in Attachment 5. Source: Attachment 5 of Genera's quarterly reports for the first, second and third quarters of Fiscal Year 2026, and Exhibit 3 of Genera's October 8, 2026 filing.

Exhibit 4 of Genera's October 8, 2026 filing, for events of the fourth quarter of Fiscal Year 2026, and Exhibit 4 of this filing, for events of the third quarter, contain root cause analyses for 20 of these cases. Table 5-2 summarizes their root causes and the resulting actions.

Table 5-2. Root causes and resulting actions for the cases in Table 5-1 with a root cause

analysis

Unit	System	Root cause (source)	Actions taken or recommended
Aguirre CC 1-1	Controls, instrumentation and protection	Incorrect wiring of exhaust thermocouples #1, #4, #5 and #12 after maintenance (June 1, 2026) (October 8 filing, Exhibit 4, pp. 1–7).	Recommended: point-to-point verification and a two-person check whenever thermocouple wiring is disconnected; permanent cable labels.
Aguirre CC 2-1	Fuel system	Failure in the fuel control circuit: low voltage at the TCQC board, fuel bypass valve solenoid and solenoid block, natural gas wiring at the QTBA terminal block, and interaction with RVDT #1 of the inlet guide vanes; no mechanical failure of the gas turbine (October 8 filing, Exhibit 4, pp. 30–38).	Completed: replacement of the TCQC board, bypass valve solenoid and solenoid block; removal of gas cables from QTBA; isolation of RVDT #1. Recommended: review of the TCQC-to-bypass-valve circuit, signal isolation at QTBA and voltage checks at critical points.
Aguirre CC 2-1	Generator, excitation and output bus	Deterioration of the insulation on the generator 13-kV output bars; operation of the generator and main transformer differential protection on June 22, 2026, with the fault location under investigation (October 8 filing, Exhibit 4, pp. 13–24).	Completed: insulation replaced, bars cleaned and main power transformer tested. Recommended: periodic insulation resistance and dielectric testing of the output bus and review of the preventive maintenance interval for high-voltage bus insulation.
Aguirre CC 2-2	Controls, instrumentation and protection	Exhaust over-temperature protection after a load increase that followed the Costa Sur 5 trip (May 25, 2026) (October 8 filing, Exhibit 4, pp. 57–61).	Recommended: verification of exhaust temperature instrumentation and inspection of EX2100 protection circuits during scheduled maintenance.
Aguirre CC 2-4	Controls, instrumentation and protection	Abnormal condition in the inlet guide vane control system at startup (May 19, 2026); exhaust over-temperature protection after the Costa Sur 5 trip (May 25, 2026) (October 8 filing, Exhibit 4, pp. 72–81).	Recommended: review of inlet guide vane control logic and instrumentation; verification of exhaust temperature instrumentation and EX2100 protection inputs during scheduled maintenance.

Unit	System	Root cause (source)	Actions taken or recommended
Aguirre 2	Auxiliaries	Loss of instrument air after both Unit 2 instrument air compressors tripped while the service air compressors were out of service, which removed the backup supply, and the condition was not identified in time (January 3, 2026) (Exhibit 4). Failure of the coupling between the condenser vacuum pump and its transmission because it had no grease (April 12, 2026) (October 8 filing, Exhibit 4, pp. 82–84).	Completed: coupling lubrication task reinstated at Aguirre and Costa Sur, with its interval reduced from six to three months (Item 8). Recommended: repair of the other air compressors, restriction of alarm disabling to authorized personnel, end-to-end testing of compressor alarms, operator training on the instrument air system, and standardized preventive maintenance routines for similar critical equipment.
Cambalache 2	Gas turbine combustion, compressor and hot section	Faulty closing indicator switch on the stage 3 blow-off valve (March 2, 2026) (Exhibit 4).	Completed: opening and closing tests of the valve and replacement of the closing indicator switch. Planned: inspection of the valve and its indicator switch during the next major inspection.
Costa Sur 5	Boiler pressure parts	Platen superheater tube failures; the drum expansion cups are the most probable source (condensate migration and steam flashing) (October 8 filing, Exhibit 4, pp. 90–94).	Task order to inspect and replace the drum expansion cups; verification and calibration of drum level; consulting and laboratory testing of tube samples; burner tilt limited to 70%.
Costa Sur 5	Generator, excitation and output bus	Field ground caused by contamination of the brush area with oil from a persistent leak at the steady bearing next to the collector rings, aggravated by moisture (February and April 2026) (October 8 filing, Exhibit 4, pp. 95–98; Exhibit 4).	New deep-cleaning procedure for short outages (in preparation). Recommended: permanent repair of the steady bearing oil leak during the next planned outage or forced outage of more than five days, and keeping the bearing inspection windows and the brush area door closed during operation and adverse weather.
Costa Sur 6	Steam and turbine valves	Binding of the main stop valves from internal degradation accumulated over several years without internal inspection (April 20, 2026) (October 8 filing, Exhibit 4, pp. 102–108).	New preventive maintenance task to disassemble, inspect and refurbish the main and reheat stop valves every two years during environmental outages (Item 8); evaluation of a valve upgrade.

Unit	System	Root cause (source)	Actions taken or recommended
Mayagüez 2B	Ignition and flame detection	Flame-out trips on May 2 and 6, 2026 from the condition of the igniters; no preventive maintenance task existed for igniter inspection (October 8 filing, Exhibit 4, pp. 130–132).	New preventive maintenance task for periodic igniter inspection and cleaning.
Mayagüez 3A	Controls, instrumentation and protection	Speed sensor trips (March 8 to 22, 2026), resolved by calibrating the speed sensor (Exhibit 4); PLC card failure (June 9, 2026) (October 8 filing, Exhibit 4, pp. 124–126).	New preventive maintenance task to verify speed sensor calibration, cable integrity and connections (to be implemented). Recommended: spare speed sensor and spare PLC card; inspection and testing of PLC cards during scheduled maintenance.
Mayagüez 3A	Auxiliaries	Water injection system: pressure transmitters out of calibration and a faulty flow meter (March 30, 2026) (Exhibit 4).	Completed: pressure transmitters calibrated and flow meter replaced. New preventive maintenance task to inspect the water injection system, including pressure transmitter and flow meter calibration (to be implemented).
Mayagüez 3B	Controls, instrumentation and protection	Liquid fuel clutch and mechanical liquid fuel pump, with high scavenging pressure readings (May 18, 2026); loose fitting on the pressure line (May 29, 2026); PLC card failure (June 9, 2026) (October 8 filing, Exhibit 4, pp. 124–138).	Completed: liquid fuel pump replaced and clutch removed, as recommended by Mitsubishi. Recommended: preventive maintenance for pressure transmitter calibration and for instrument tubing and fittings; spare PLC card.
Mayagüez 4B	Auxiliaries	Secondary fan limit switch and alarm settings (January 11, 2026) and a faulty water injection level switch, LSL801 (January 18, 2026) (Exhibit 4).	Completed: limit switch and alarm settings corrected, LSL801 replaced, and a new preventive maintenance task to inspect the secondary fan limit switch and alarm settings. Recommended: spare limit switches in inventory.
Mayagüez 4B	Fuel system	Governor failure that caused a flame-out at startup (March 24, 2026) and a faulty solenoid valve (March 26, 2026) (Exhibit 4).	Completed: governor and solenoid valve replaced, and a new preventive maintenance task to inspect the solenoid valves, with progressive replacement of aging valves. Recommended: spare governor in inventory.

Unit	System	Root cause (source)	Actions taken or recommended
San Juan CT 5	Fire protection	Water intrusion in a fire protection pull station caused its accidental activation; no procedure existed to verify the integrity of critical instrument enclosures (October 8 filing, Exhibit 4, pp. 148–154).	Enclosure and seal integrity checks to be added to the preventive maintenance; temporary tape to be replaced with weatherproof seals (work requests issued).
San Juan CT 5	Controls, instrumentation and protection	Blade path temperature spread trip from a sudden drop in exhaust temperature caused by the steam injection spray; seat leakage in the temperature control valve and the manual isolation valve (October 8 filing, Exhibit 4, pp. 155–163).	Temporary operating instruction updated on April 23, 2026 with a valve verification checklist; valve replacement in procurement.
San Juan ST 5	Turbine bearings, gears and vibration	High vibration at bearing 1 that reached the 8-mil trip setting, caused by thermal reactions of the rotor; contributing factors were excessive wear of the steam seals, a bowed rotor, misalignment and unbalance (February 7, 2026) (Exhibit 4).	Proposed: balancing at bearings 1 and 2, verification of the rotor shaft centerline at bearings 2 and 3, and a turbine overhaul.
San Juan 9	Auxiliaries	Seizure of circulating water pump 9-1, with protection settings that did not isolate the fault at the pump breaker, which caused the loss of the 4,160 V bus (March 22, 2026) (Exhibit 4); short circuit in the limit switch cabling of boiler feed pump 9-2, where the 4,160 V breaker did not isolate the fault at the motor level (May 23, 2026) (October 8 filing, Exhibit 4, pp. 164–172).	Completed: cabling replaced. Proposed: inspection of circulating water pump 9-1; automatic start of the standby pump; replacement of the boiler feed pump 9-2 motor and the normal station service transformer during the major outage; and a protection coordination study for all operating units.

For the other cases in Table 5-1, Exhibit 3 identifies the events and states whether they resulted in changes to the maintenance program and, where they did not, the reason. Beginning with its report for the first quarter of Fiscal Year 2027, Genera's Attachment 5 will identify, for each forced outage event, the root cause analysis document or, where no separate analysis was prepared, an explanation, together with the preventive action, the scheduled and actual completion dates, and whether the duration of the event was affected by the availability of Consumables, Spare Parts, and Capital Spare Parts.

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 Mayaguez 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 of Genera's October 8, 2026 filing 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.

Genera's maintenance program for the main generating units consists of preventive, predictive (condition monitoring), and corrective maintenance. All maintenance activities are scheduled and tracked in Genera's enterprise asset management (EAM) system, consistent with the Plant Maintenance Manual, vendor technical documentation, and sound engineering practices.

Genera's work order records are kept by plant and do not track the backlog in labor hours. The figures in Tables 8-1 and 8-2 were extracted from Genera's enterprise asset management (EAM) system in October 2026 and reflect the best information available to Genera at that time. Work order records are dynamic: they may be updated, reclassified, closed or entered after that date as work is completed and records are reviewed. The figures may therefore differ from those obtained from the same records

on a later date. The figures below are presented by plant, with the backlog stated in work orders.

Table 8-1. Preventive and corrective work orders by plant, Fiscal Year 2026

Plant	Preventive work orders scheduled (due in FY2026)	Preventive completed by June 30, 2026	Preventive backlog at June 30, 2026	Corrective work orders entered in FY2026	Corrective backlog at June 30, 2026	Corrective-to-preventive ratio
Aguirre (Units 1 and 2)	6,123	5,978	172	2,442	341	0.40
Aguirre Combined Cycle	3,695	3,621	74	1,201	162	0.33
Costa Sur (Units 5 and 6)	3,687	3,546	143	1,904	735	0.52
Palo Seco (Units 3 and 4) [1]	3,950	3,645	329	2,495	677	0.63
San Juan (Units 5, 6, 7 and 9)	2,881	2,702	196	2,337	671	0.81
Cambalache	1,144	1,105	44	257	79	0.22
Mayagüez	336	296	40	111	11	0.33
Total	**21,816**	**20,893**	**998**	**10,747**	**2,676**	**0.49**

By June 30, 2026, Genera completed 20,893 of the 21,816 preventive work orders due in Fiscal Year 2026 (96%). At that date, 998 preventive and 2,676 corrective work orders remained open. Genera entered 10,747 corrective work orders in Fiscal Year 2026, for a corrective-to-preventive ratio of 0.49.

Table 8-2 shows the vibration and infrared thermography findings with a defect in the condition-assessment reports, and the findings converted into a work order. A finding is counted as converted when the report records a work order number, or when the work request recorded in the report has status Actioned (work order issued) or Complete (work order executed) in the EAM. Findings are counted as reported in each assessment. Genera did not perform ultrasound inspections in Fiscal Year 2026. Boiler tube surveys are addressed in the response to Item 9.

Table 8-2. Condition-monitoring findings converted into work orders by plant, Fiscal Year

2026

Plant	Vibration: findings with a defect	Vibration: converted into a work order	Infrared thermography: findings with a defect	Infrared thermography: converted into a work order
Aguirre (Units 1 and 2)	109	74	14	6
Aguirre Combined Cycle	93	8	10	7
Costa Sur (Units 5 and 6)	167	105	75	47
Palo Seco (Units 3 and 4)	181	93	104	1
San Juan (Units 5, 6, 7 and 9)	135	73	175	0
Cambalache	86	54	0	0
Mayagüez	21	13	3	3
Total	**792**	**420**	**381**	**64**

Genera uses this information as follows:

Outage scopes and Unit Maintenance Plan. Corrective work orders and findings that require the unit to be out of service are assigned to the next planned outage or outage opportunity in the EAM system. Planned outages are coordinated with Operations to address equipment updates and unit-specific technical requirements, and Warehouse and Operations conduct fleet inspections to identify wear and deterioration trends. Fiscal Year 2026 examples:

- At Costa Sur Unit 6, after the April 20, 2026 forced outage caused by binding of the turbine stop valves, Genera established a preventive maintenance task to refurbish the main and reheat stop valves every two years during environmental outages.
- At Aguirre Unit 2, after the April 12, 2026 vacuum pump coupling failure, Genera reinstated the coupling lubrication task at Aguirre and Costa Sur and reduced its interval from six to three months.

Spare Parts and Capital Spare Parts. Warehouse, Plant Operations, and Procurement meet weekly to review inventory levels and consumption history, so that material

availability aligns with scheduled maintenance and outage planning. Items used are replenished through Genera's EAM system reorder process. Fiscal Year 2026 examples:

- For Cambalache, after the June 18, 2026 failure of the CO_2 fire protection cooling unit, Genera determined to keep a spare cooling unit and created a preventive maintenance task for it.
- For Costa Sur Unit 6, Genera identified the 60 replacement components required for the stop valve refurbishment, at an estimated cost of $97,700.

10. For every unit that, as of the date of this Resolution and Order, has been out of service for more than thirty (30) days or is operating with a capacity limitation greater than ten percent (10%) of its nameplate capacity: the date on which the condition began; its cause; the scope of the repair; the contracts and critical components required and their status; the critical path; the estimated return-to-service or full-capacity date; and each previous estimate, with the reason it was not met. For Aguirre Unit 1, Genera shall include the date, scope, value, and schedule of the contract awarded to the original equipment manufacturer.

Response:

Table 10-1 lists each unit that, on September 18, 2026, had been out of service for more than 30 days or was operating with a capacity limitation greater than 10% of its nameplate capacity.

Table 10-1. Units out of service for more than 30 days or limited by more than 10%

Unit	Condition began	Cause and repair scope	Contracts and critical components (status)	Estimated return or full capacity	Previous estimates (reason not met)
Aguirre 1	February 14, 2025	Catastrophic generator failure (rotor and stator). Generator stator and rotor rewind, stator repair and auxiliary equipment repairs	Original equipment manufacturer contract: stator and rotor rewind, task order 01, $8.4 million, and stator repair, task order 02, $9.6 million ($18.0 million in total; in execution); spare rotor rewind for Units 1 and 2, $5.1 million (in execution)	Generator repairs by March 2027; return in Q4 FY2027	Spare parts unavailability.

Unit	Condition began	Cause and repair scope	Contracts and critical components (status)	Estimated return or full capacity	Previous estimates (reason not met)
San Juan 6 steam unit	June 12, 2024	Damage from an electrical system disturbance originating in the transmission and distribution system. Steam turbine repairs, rotor installation and condenser rehabilitation	Steam turbine repairs, $13.7 million, and condenser rehabilitation, $5.7 million (in execution); rotor repaired and on site since mid-July 2026	Q2 FY2027, subject to LUMA's authorization of the outage	In September 2026 the steam rotor was installed, but it failed during commissioning and testing, and Genera found it necessary to rework it.
San Juan 7	October 2024	Major failure two weeks after the unit's return to service on June 27, 2026. Turbine repairs	Turbine spare parts are damaged and in need of replacement. Procurement process in progress.	Q4 FY2027	Failure in turbine spare parts and procurement processes.
San Juan 9	First week of July 2026	Scheduled major overhaul, about 40,000 hours past due when received from PREPA: turbine, boiler and auxiliaries	Major overhaul, $23.7 million in total (procurement), including boiler rehabilitation, $4.4 million, turbine rehabilitation, $15.5 million, and condenser rehabilitation, $2.6 million (in execution)	Q4 FY2027	Failure in turbine spare parts and procurement processes and set-backs.
Aguirre Combined Cycle steam unit 1	November 2024	Maintenance outage extended by condenser circulating water pump and condenser findings	Pump parts delivery pending. The pump was sent to a workshop in Spain, and Genera received the inspection report at the end of October 2026.	Q4 FY2027	Maritime transportation delays and spare parts availability.

Unit	Condition began	Cause and repair scope	Contracts and critical components (status)	Estimated return or full capacity	Previous estimates (reason not met)
Aguirre CC 1-3	The condition began before July 1, 2023	Major inspection.	Major inspection, $3.75 million (in execution)	Q4 FY2027	Procurement processes and additional spare parts.
Aguirre CC 2-1	June 2026	Unit trip due to generator and exciter fault.	In progress.	To be determined	Funding availability.
Aguirre CC 2-3	December 2023	Turbine blade damage found during inspection	Spare turbine rotor, $2.0 million (procurement)	March 27	Funding availability and procurement processes.
Costa Sur 6 (limited)	The condition began before July 1, 2023	Capacity limited by high differential pressure in the air heaters. The unit was due an environmental inspection, air preheater baskets and hydrogen seals	Environmental inspection, $6.0 million (planning); baskets (FEMA); generator work (DOE)	Full capacity (410 MW) after the Q2 FY2027 outage	System conditions.
Aguirre 2 (limited)	The condition began before July 1, 2023	Tested capacity of 350 MW against 450 MW nameplate. Environmental inspection, spare generator rotor, low-pressure turbine seals and air preheater baskets	Environmental outage and baskets, $2.7 million (planning); air preheater installation (procurement); spare rotor rewind, $5.1 million (in execution)	Full capacity (450 MW) after the Q4 FY2027 outage	Environmental outage planned March 1 to September 30, 2026.

Unit	Condition began	Cause and repair scope	Contracts and critical components (status)	Estimated return or full capacity	Previous estimates (reason not met)
Mayagüez 1A	February 2025	Casing crack on compressor.	Awaiting funding allocation.	To be determined	Funding availability.
Mayagüez 1B	January 2025	Particulates in the bearings; high differential pressure at PDT629.	Awaiting funding allocation.	To be determined	Funding availability.
Mayagüez 2A	April 2026	Unit trip due to an erratic pressure differential in a scavenge line. Turbine and compressor repairs.	Repair contracts of about $10 million (DOE funding).	November 2026	Procurement processes.
Mayagüez 4A	April 2026	The unit exhibited a back pressure issue. This is typically caused by the fuel injection system, water injection system, or bleed valves that may or may not have opened at a specific point in time. A trendline analysis was performed to graphically identify the problem, and no discrepancies were found.	Procurement in progress.	Q4 FY2027	In July 2026 the motor was repaired, but because of failures in auxiliary equipment and the urgency to restore capacity to the system, it was installed in Mayagüez 3B.
Palo Seco 1-1	July 2025	High vibrations on bearing 1.	Contract executed, about $0.5 million.	Completed	—

Unit	Condition began	Cause and repair scope	Contracts and critical components (status)	Estimated return or full capacity	Previous estimates (reason not met)
Palo Seco 2-1	January 2025	Aging gas turbines; retirement proposed in the 2025 Integrated Resource Plan for 2027	Contract executed, about $0.5 million.	December 27	Procurement processes.
Palo Seco MP3	August 2026	Tripped due to high pressure at sensor PDT629A. Major repairs to equipment required.	Pending funding.	To be determined	Funding availability.
Palo Seco 3 (limited)	August 2026	High temperature on the turbine bearings	In progress.	January 27	System conditions.
Palo Seco 4 (limited)	August 2026	Boiler air leak.	In progress.	December 26	System conditions.

Aguirre 1 contract with the original equipment manufacturer. Genera awarded the generator repair contract to General Electric, the unit's original equipment manufacturer. The contract covers the generator stator and rotor rewind under task order 01 ($8,390,446) and the stator repair under task order 02 ($9,615,363), for a total of $18,005,809. Under task order 04 of the same contract, General Electric is also rewinding the spare generator rotor for Units 1 and 2 ($5,099,670), scheduled for completion by December 31, 2026. Work began on February 17, 2026. Task order 01 is scheduled for completion by January 10, 2027 and task order 02 by March 16, 2027, and the unit's return to service is expected in the fourth quarter of Fiscal Year 2027.

Exhibit 1

Fiscal Year 2026 Fleet Performance Indicators

Submitted via email in native Excel format.

Exhibit 2

Fourth Quarter of Fiscal Year 2026 Forced Outages of 24 Hours or More: Effect of Parts Availability

Submitted via email in native Excel format.

Exhibit 3

Fiscal Year 2026 Forced Outage Events Grouped by Unit and Cause

Submitted via email in native Excel format.

Exhibit 4

Root Cause Analyses, Third Quarter of Fiscal Year 2026

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