NEPR

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

IN RE: 10-YEAR PLAN FEDERALLY FUNDED COMPETITIVE PROCESS	Case No.: NEPR-MI-2022-0005 Motion to Submit Monthly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with *Resolution and Order* of July 30, 2024

MOTION TO SUBMIT MONTHLY REPORT ON THE STATUS OF EMERGENCY GENERATION AND BLACK-START GENERATION PROCUREMENT IN COMPLIANCE WITH RESOLUTION AND ORDER OF JULY 30, 2024

TO THE ENERGY BUREAU:

COMES NOW, GENERA PR, LLC ("Genera"), through its undersigned counsel and, very respectfully, states and prays as follows:

1. On January 23, 2023, the Puerto Rico Energy Bureau ("PREB") issued *a Resolution and Order* ("January 23 Order") that conditionally approved PREPA's RFP process for the procurement of emergency peaker generation systems at Jobos, Daguao, and Palo Seco ("the Projects"), subject to various conditions.

2. On November 8, 2023, the PREB issued another *Resolution and Order* ("November 8 Order") approving the RFP package submitted by Genera for the procurement of black start and emergency generation services.

3. On February 29, 2024, Genera filed a document titled *Motion to Submit Bi-weekly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with Resolution and Order Dated January 23, 2023* ("February 29 Motion"), in which Genera stated that initial award was scheduled for March 2024.

4. On July 1, 2024, Genera filed a document titled *Motion to Submit Bi-weekly Report on the Status of Emergency Generation and Black-Start Generation Procurement in Compliance with Resolution and Order Dated January 23, 2023* ("July 1 Motion"), in which Genera included as Exhibit A the Bi-Weekly report describing the status of the Emergency Generation and Black-Start Generation Procurement. Genera also informed that starting on July 1, 2024, pursuant to Footnote 16 of the January 23 Order, reports would be submitted on a quarterly basis, consistent with the fiscal year's quarters *(e.g.,* July 1 to September 30 for Q1, October 1 to December 31 for Q2, and so forth), and that their next report was due by October 9, 2024.

5. On July 30, 2024, the PREB issued a *Resolution and Order* ("July 30 Resolution") in which, in relevant part, denied Genera's request to submit quarterly reports instead of biweekly reports, and ordered Genera to submit monthly reports beginning on August 15, 2024.

6. In compliance with the July 30 Resolution, Genera respectfully submits its monthly report on the status of Emergency Generation and Black-Start Generation Procurement for the month of October 2026, included herein as Exhibit A.

WHEREFORE, Genera respectfully requests that the PREB **take notice** of the above; **accept** Genera's report on the status of Emergency Generation and Black-Start Generation Procurement for the month of October 2026, included herein as Exhibit A; and **deem** Genera in compliance with the July 30 Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of November, 2026.

It is hereby certified that this motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys

who have filed a notice of appearance in this case: **Lcda. Mirelis Valle Cancel**, mvalle@gmlex.net; **Lcda. María Teresa Bustelo-García**, mbustelo@gmlex.net.

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Exhibit A – Monthly Report (October 2026)

Emergency Generation and Black-Start Generation Procurement

Docket Number: NEPR-MI-2022-0005
In Re: 10 YEAR PLAN FEDERALLY FUNDED COMPETITIVE PROCESS
Re: Monthly Progress Report – October 2026

In the July 30, 2024, Resolution and Order the Puerto Rico Energy Bureau (PREB) ordered Genera to submit monthly reports on the status of emergency generation and black-start generation procurement, commencing August 15, 2024. Additionally, the Energy Bureau ordered Genera to include, as part of the next and subsequent monthly progress reports, at a minimum, the following:

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a. breakdown of each task, estimated cost, cost amount consumed, and timeline for completion of such task.

Response:

Timelines are detailed in response #1(b). A comprehensive overview of the tasks, along with their estimated costs and the amounts consumed to date, is provided in the following charts:

	Budget	Costs Incurred	Remaining
Equipment Purchase	$ 513,478,819.97	$ 428,178,364.76	$ 85,300,455.21
Site Development & Construction	$ 452,996,936.67		$ 418,429,576.89
Project Development		$ 33,217,206.72	
Permitting		$ 337,698.43	
Decommissioning & Demolition		$ 1,012,454.63	
Construction		$ -	
Commissioning		$ -	
Interconnection		$ -	
	$ 966,475,756.64	**$ 462,745,724.54**	**$ 503,730,032.10**

In May 2026, the Equipment Purchase Budget was updated to include an additional $51,966,742.25 from obligated V8 Equipment Funding. These funds have been incorporated into the budget to support the procurement of electrical infrastructure components, including switchgears, transformers, and Balance of Plant (BOP) equipment. The additional funding ensures adequate financial resources are available for

the acquisition of these essential systems, which are required to support overall plant operations, reliability, and project execution objectives.

Activity	Scope	Costs Incurred
Project Management	Project Development	$ 4,499,869.06
Design	Project Development	$ 27,573,874.00
Site Surveys	Project Development	$ 1,143,463.66
Permitting	Permitting	$ 337,698.43
Equipment Purchase	Equipment Purchase	$ 428,178,364.76
Demolition	Decommissioning and Demolition	$ 1,012,454.63
	Total:	**$ 462,745,724.54**

Executive Summary

During this period at the Costa Sur site the demolition contract is pending retainage payment for closeout. Genera continues with the development of the Scope of Work (SOW) to publish the Point of Interconnection (POI) RFP for the Peakers sites on November 2026.

The critical path remains decommissioning of existing peaker units. As set forth by LUMA, the condition to the approval for decommissioning of the existing units relies in providing 810MW of new additional generation and/or interconnection of batteries, while Yabucoa has been the only Peaker site taken out of service so far. The Energy Bureau requested LUMA to provide an update of the actual needs of additional generation. Further LUMA provided the information to the Energy Bureau supporting the need of approximately 750-800 MW of additional generation, the Bureau ordered LUMA to provide information regarding the POI for the new generation. The Bureau granted LUMA two months to provide it. Notwithstanding, the Plan received conditional approval from the Puerto Rico Public-Private Partnerships Authority (P3A) and

the Puerto Rico Energy Bureau (PREB), and an updated version was resubmitted for final approval showing compliance with the conditions established by both entities which have been demonstrated.

The Jobos and Daguao decommissioning remains contingent on completion of the BESS interconnection process at Vega Baja and Cambalache, where the contractors are working on the 60% and 100% IFC packages, respectively. The approximately 800 MW of temporary emergency generation needed to offset LUMA's requirement to authorize the decommissioning of the remaining units is still depending on the next steps to be undertaken by 3PPO upon the contract cancellation of one provider.

For the Engineering, Procurement, and Construction (EPC) RFP #5195 covering Jobos, Yabucoa, and Daguao, contract was submitted for stakeholder's approval after closing out negotiations with the selected proponent on October 15th. The EPC contract was approved by P3A on October 30th, but it is still pending approval by FOMB. The contract for the Yabucoa site demolition was approved by P3A on October 23rd and is currently under contract signing process to provide NTP to contractor.

The project will move forward after the completion of the land transfer for the Yabucoa site as agreed during the September 25 meeting with PREPA. During November 2026, Genera will be providing PREPA and P3A a MOU for execution of the land transfer. After completion of the BESS interconnection process in Cambalache and Vega Baja, the process to decommission units at Jobos and Daguao will be carried out.

Progress Overview by Site:

CostaSur

- Genera recently received the invoice for the demolition retainage payment and is currently processing the payment. Once paid, the demolition contract will be ready to be executed.
- A time extension until November 2026, for the proposal's submission date for RFP #5228, addressing Civil, Structural and Peakers installation works, was agreed.
- Genera is still developing the SOW in preparation for the publication of the POI RFP during November 2026.
- The revised timeline for the Costa Sur project reflects the time required to complete FEMA approval and the subsequent procurement process. FEMA approval was requested on September 20, 2024, and granted on October 30, 2025. Immediately following approval, procurement of construction contractors began and is still underway, with proposals submissions expected by November 2026. As construction is contingent upon completion of the procurement process, the project schedule has been directly affected by these sequential requirements.

Yabucoa

- The land transfer discussion for the Yabucoa project was held with PREPA on September 25th, and the next steps were agreed.
- The final Facility Studies were received in April 2026, and since then Genera has been working in the development of the SOW to publish POI RFP.
- The Yabucoa Decommissioning Plan was revised and resubmitted for approval as ordered by the Energy Bureau.
- Contract for the EPC RFP #5195, covering Peakers installation works for Yabucoa, was approved by P3A on October 30, 2026. Genera is currently waiting for contract approval by FOMB after submission on October 15th.

- Regarding the Yabucoa demolition RFP #5226, Genera submitted the contract for P3A's approval on September 25th and received approval on October 23rd. Genera is currently in the process of finalizing the contract for demolition works, with the Notice to Proceed (NTP) expected to be issued in November 2026.
- The Yabucoa project timeline reflects an extended sequence of regulatory approvals and procurement steps. On January 7, 2025, LUMA required 810 MW of additional new generation and/or replacement capacity to be available before decommissioning could proceed, a condition tied to delays in the 800 MW Emergency Generation Project managed by the 3PPO. Formal conditional approval from LUMA was received on January 26, 2026, contingent upon the installation of BESS to offset peaking generation capacity. LUMA authorized disconnection and decommissioning on April 10, 2026. The P3A issued the Decommissioning Notice on June 2, 2026, Genera submitted its Decommissioning Plan on July 1st, 2026, and received conditional approval on September 10th, 2026. The Plan was subsequently revised to incorporate the conditions established in the approval and resubmitted for approval. The procurement process for the demolition and EPC contractors is ongoing. The demolition contract has been submitted for execution, and Genera expects to issue the NTP to the contractor in November 2026, following completion of the contract execution process. The EPC contract was submitted to FOMB on October 15, 2026, and remains under evaluation for approval. As construction cannot begin until these steps are completed, the project timeline has been directly impacted by the successive regulatory approvals, contractual requirements, and procurement milestones necessary to advance the project.

Jobos and Daguao

- For the EPC RFP #5195, covering the installation of Peakers at the Jobos and Daguao sites, the contract is pending approval by the FOMB, following its submission on October 15, 2026. The contract was previously approved by P3A on October 30, 2026. Upon receiving FOMB approval, Genera will proceed contract execution and subsequently issue the NTP to the contractor.
- Following the competition of the Facility Studies, Genera proceeded with the development of the SOW in preparation for the issuance of the POI RFP, which is expected to be published in November 2026.
- The Jobos and Daguao project schedules have been impacted by a prolonged regulatory approval process and their dependency on the

interconnection of the BESS at Vega Baja and Cambalache. In November 2024, LUMA concurred with the decommissioning of Jobos 1-1, which was impaired; however, LUMA objected to the decommissioning of the operating units: Jobos 1-2 and Yabucoa 1-2. Although the decommissioning of Jobos Unit 1-1 was authorized, demolition activities cannot commence due to the potential risks posed to the adjacent operating Unit 1-2.

- Similarly, LUMA objected to the decommission of Daguao 1-1 and 1-2. The decommissioning of operating units was conditioned upon the addition of 810 MW of replacement generation capacity to the electrical grid. In January 2026, LUMA granted conditional approval for the decommissioning of Yabucoa, Jobos, and Daguao, contingent on BESS installation, specifically requiring the prior interconnection of the BESS facilities at Vega Baja and Cambalache. The interconnection process is subject to a separate schedule and several technical and regulatory milestones, including the completion and receipt of Facility Studies in late 2025, approval of the SOW in April 2026, and ongoing design development, with Cambalache reaching 100% IFC and Vega Baja currently at a 60% completion. Consequently, the Jobos and Daguao decommissioning schedules remain dependent on the successful completion of the BESS interconnection process, which has directly affected the ability to advance demolition and subsequent project activities.

Potential Risks

As in every construction work, unforeseen circumstances may affect schedule performance, including global supply-chain constraints, required approvals from applicable authorities, legal disputes, environmental reviews, decommissioning process, and environmental permits. These factors resulted in unanticipated delays. The following is a list of some of such circumstances that have been confronted or may be experienced throughout the entire process.

Potential Risks	
1. Environmental Assessments and Permits	a. Changes in environmental law and environmentally related permits. b. Denial or delays in obtaining necessary environmental permits or approvals. c. Unforeseen environmental contamination requires additional remediation efforts.
2. Regulatory Compliance	a. Denial or delay in obtaining necessary permits or approvals (including, but not limited to, those needed from the T&D System Operator such as units decommissioning concurrence) b. Changes in applicable law or regulatory requirements or additional compliance measures imposed by authorities. c. Changes in regulatory interpretation. d. Changes in regulatory enforcement. e. Extended review periods by regulatory agencies.
3. Site Conditions	a. Need of additional space for any reason, including project development entailing an acquisition process. b. Unforeseen technical difficulties in dismantling equipment or infrastructure. c. Unanticipated structural issues or site conditions that complicate demolition. d. Unforeseen site conditions, whether subsurface or otherwise concealed. f. Changes in the site conditions due to weather or

Potential Risks	
	otherwise.
4. Technical Challenges	a. Unforeseen technical difficulties in decommissioning or dismantling equipment or infrastructure. b. Delays due to the unforeseen need for specialized equipment or expertise. c. LUMA may not accept the use of existing interconnection points for the new Peaker units and may require the development and construction of new interconnection points.
5. Weather and Natural Events	a. Adverse weather conditions (e.g., rain) impacting demolition activities. b. Natural disasters (e.g., earthquakes, floods) causing delays.
6. Contractor and Resource Availability	a. Limited availability or delay in obtaining qualified contractors or specialized personnel for whatever reason. b. Limited availability or delays in delivering necessary equipment, materials, or other supply chain constraints. c. Exceeding capacity limits of approved dumps for disposal of debris. d. Unavailability of labor or subcontractors. e. Proposals received in excess of federal allocated budget f. Global demand increase of generation turbines
7. Health and Safety Concerns	a. Unanticipated health and safety risks requiring additional precautions. b. Implementation of HSE measures by a governmental authority for whatever reasons. c. Incidents or accidents on-site necessitating work stoppages or investigations.

Potential Risks	
8. Stakeholder and Community Engagement	a. Delays due to the need for additional stakeholder consultations or community engagement. b. Public opposition to the project. c. Interference from environmental, community, or social justice organizations. d. Legal challenge seeking to contest the validity of the RFP, the demolition agreement, permits, or other transaction contemplated in the demolition contract.
9. Change Order Risk / Financial Constraints	a. Unexpected cost overruns require additional financial planning and consulting with regulatory agencies to increase budget and funding. b. Change Order risk.
10. Logistical Issues	a. Unforeseen changes concerning the transportation permits and the means of transportation of debris. b. Transportation, logistics, or access issues affecting the movement of materials, equipment, and labor. c. Issues that affect the availability and condition of roads, bridges, or other transportation infrastructure required to mobilize equipment, materials, and labor in and out of the site. d. Coordination challenges with other ongoing projects or site activities.
11. Contractor Delays	a. Failure of contractors and their subcontractors to execute tasks within the timeframes established in their contracts or subcontracts (including delivery times.[1]). b. Delays caused by the contractor and subcontractor's performance issues.

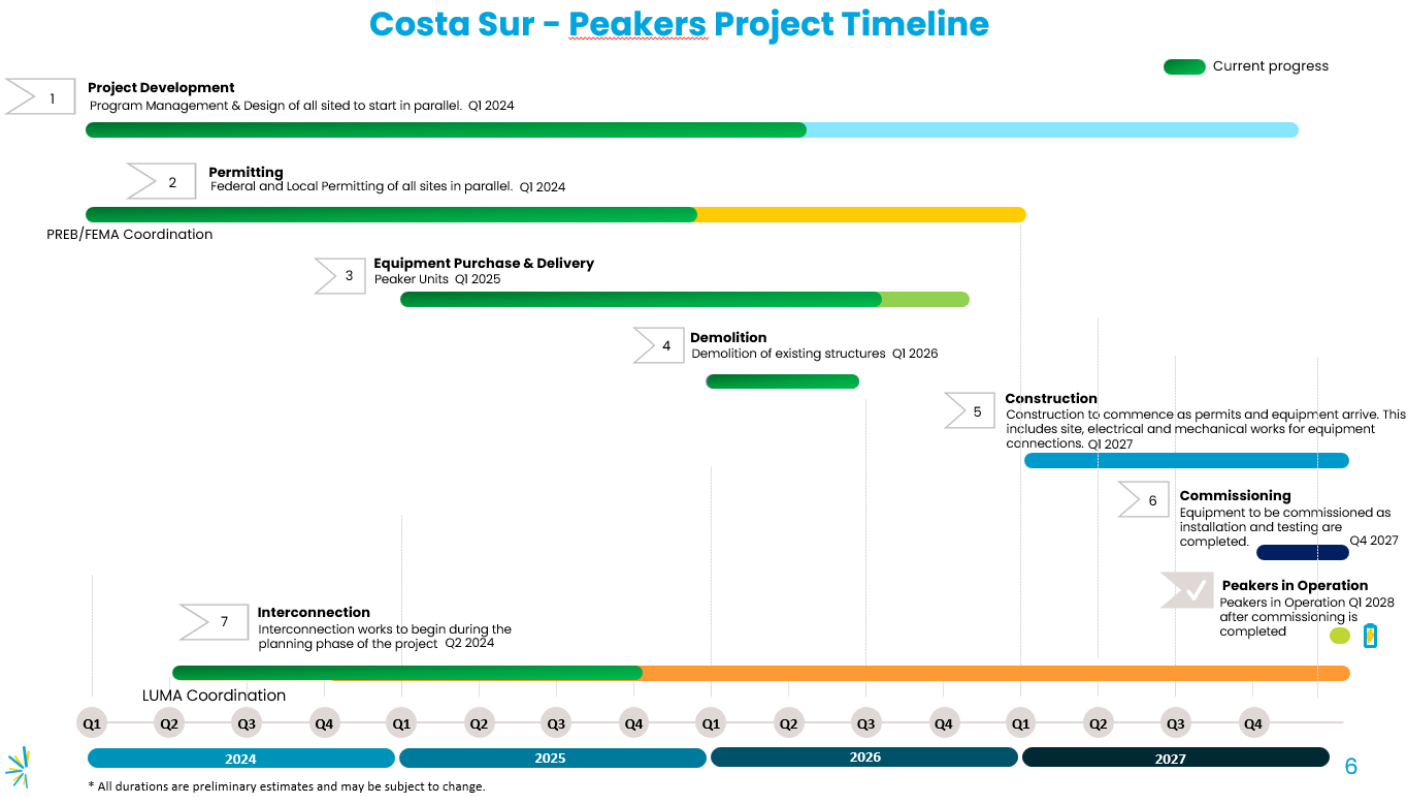
[1] These could range from, but are not limited to, delays in delivery time, defective or non-conforming equipment, and incomplete documentation. Supply chain issues and customs or import delays also fall under the seller's responsibility. Quality control failures, lack of necessary parts or components, and incorrect specifications can cause significant setbacks. Warranty issues, delays in technical support, and non-compliance with regulatory standards add to the seller's accountability. Packaging and shipping issues, inadequate training or installation support, and intellectual property disputes further complicate project timelines. Additionally, any delays in custom modifications to the equipment requested by the buyer are the seller's responsibility. All other conditions listed in the purchase agreements.

Potential Risks	
12. Labor-Related Issues:	a. Delays due to labor strikes, work stoppages, or other union-related actions. b. Negotiation challenges with unions affecting the availability of labor or the timeline for project execution. c. Delays due to reduced productivity caused by labor disharmony.

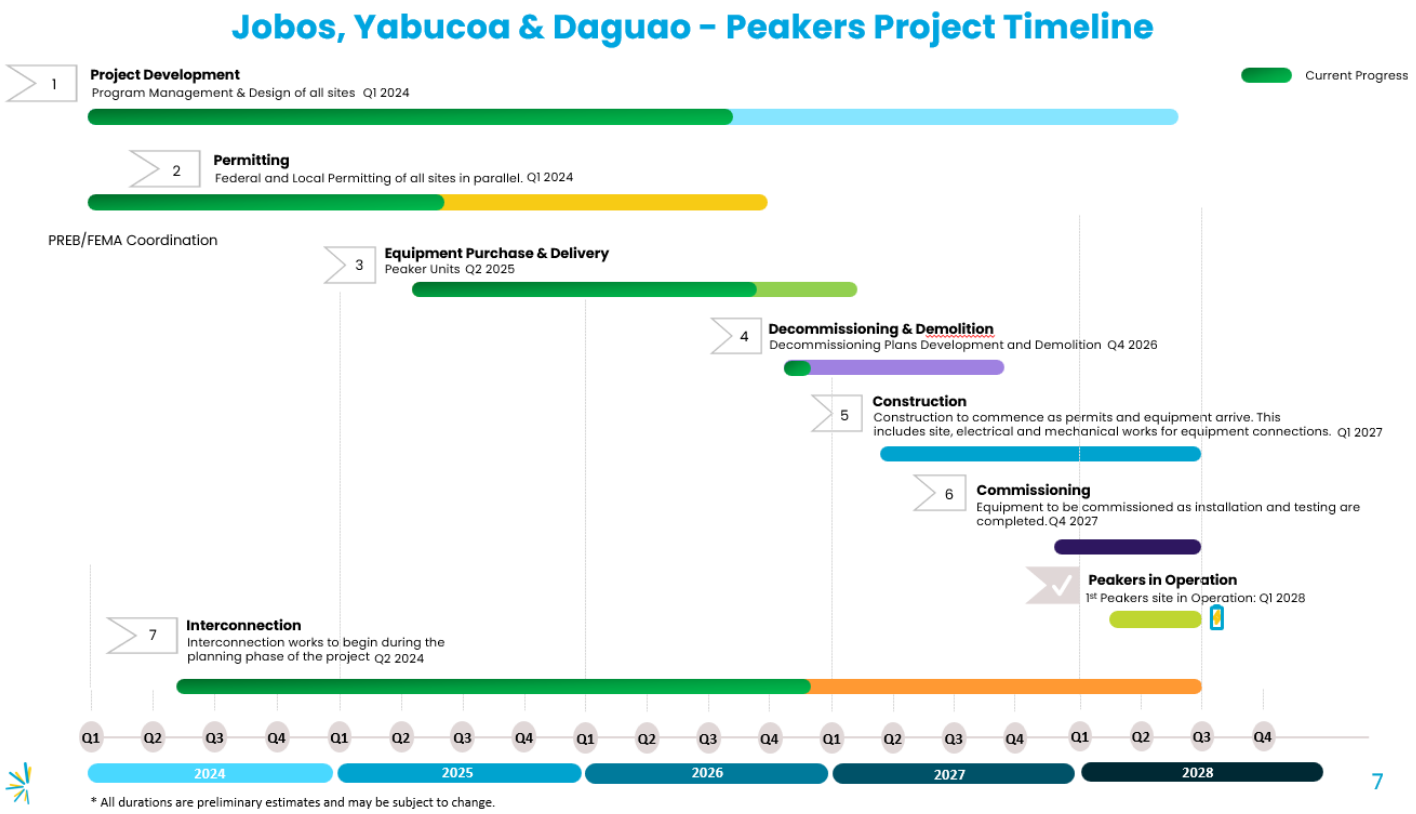
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b. The stages of each task, timeline, present status, and estimated time for completion.

Response:



Note: Construction (item 5), Commissioning (item 6), and Interconnection (item 7) are subject to completion of procurement process, which started in October 2025 after receiving approval of FEMA funding. Detailed durations of construction and commissioning processes can be seen in chart "Costa Sur: Peakers Project Duration" below. FEMA approval was required in order to be able to make the mandatory funding certifications for procurement processes.



Note: Construction (item 5), Commissioning (item 6), and Interconnection (item 7) are subject to completion and approval of Decommissioning Plans. Detailed durations of construction and commissioning processes can be seen in chart "Jobos, Yabucoa & Daguao: Peakers Project Duration" below.

Key Factors Impacting Schedule:

a. This project was submitted to FEMA on September 20, 2024. After FEMA began evaluating the Project, multiple RFIs were received, especially from environmental teams. Extensive negotiations with FEMA EHP were held to avoid triggering a higher-level NEPA review, which would have potentially delayed the project for over a year. After 13 months, the project received approval from FEMA on October 30, 2025.

b. LUMA has not authorized the decommissioning of all existing peaker units (except Yabucoa). LUMA opposed Genera's decommissioning plan and requested all MW capacity substitutions along with 810MW of additional or replacement generation capacity to concur with the decommissioning request. Genera had anticipated that the 800MW Emergency Generation Project would be implemented, but the project remains subject to further procurement actions by the 3PPO. The new peaking units cannot be installed without first removing the existing units in Yabucoa, Daguao and Jobos, since they will be installed in the same footprint. Genera received LUMA's formal conditioned concurrence letter on January 26, 2026. However, as part of the conditions, Genera must place at least 76MW of BESS into service before beginning decommissioning of the existing peaker units. Only Yabucoa units were authorized to be decommissioned. The Decommissioning Notice was received from P3A in June 2026. Genera submitted the Decommissioning Plan on July 1st, 2026. The decommissioning of the remaining units continues to depend on compliance with LUMA's conditions, including the required BESS interconnections at Vega Baja and Cambalache. These conditions directly affect the commencement of demolition activities and the subsequent installation of replacement generation capacity at Jobos and Daguao.

c. The Impact Study and Facility Studies for Costa Sur and Yabucoa were completed by LUMA in April 2026. LUMA completed the Facility Studies for Daguao and Jobos in June 2026. These were needed before agreeing to the use of the existing interconnection points. These delays in completing the Facility Studies affected the project execution by 9–18 months from the proposed timeline presented by Genera. Following receipt of the Facility Studies, Genera proceeded with the development of the SOW for the POI RFPs, with publication anticipated in November 2026. Consequently, the project

schedules remain dependent on completion of the corresponding procurement processes and subsequent interconnection works.

d. Costa Sur project Federal Funds Approval and Procurement Timeline:

i. The project was submitted to FEMA for approval on September 20, 2024.
ii. FEMA funding approval was granted on October 30, 2025. FEMA approval was required to complete the mandatory funding certifications for procurement processes.
iii. Procurement for construction contractors was initiated immediately upon funding approval on October 30, 2025; the procurement process remains ongoing, with proposals originally set for submission by August 2026 and subsequently extended to November 2026 under RFP #5228, covering civil, structural, and Peakers installation works.
iv. Following the completion of procurement, the construction start date will be affected by the proponents proposed schedules and duration of the P3A and FOMB approval process, as contract execution and the issuance of the NTP remain subject to obtaining the required approvals.

e. Yabucoa Decommissioning and Regulatory Approval Timeline:

i. Retirement process formally initiated by Genera on August 23, 2024, under Article 16 of the LGA-OMA, followed by submission of a Decommissioning Plan (October 11, 2024) and an updated timeline (October 23, 2024).
ii. On November 4, 2024, LUMA concurred with the retirement and decommissioning plan for Yabucoa 1-1. However, LUMA objected the retirement of Yabucoa 1-2; Genera responded to LUMA's objections on December 10, 2024.
iii. On January 7, 2025, LUMA reaffirmed its position, conditioning decommissioning on the addition of 810 MW of additional or replacement generation capacity to the grid.
iv. Delays in the 800 MW Emergency Generation Project, managed by 3PPO, led Genera to submit a revised Unit Retirement Timeline strategy on September 19, 2025.
v. LUMA granted conditional approval to decommission equipment

on January 26, 2026, pending BESS installation.

vi. PREPA sent a follow-up request to LUMA for disconnection and decommissioning of Yabucoa units on March 23, 2026, following Genera's request on March 20, 2026.

vii. LUMA authorized disconnection and decommissioning of Yabucoa Units on April 10, 2026.

viii. P3A issued the Decommissioning Notice for Yabucoa Units on June 2, 2026; Genera submitted the Decommissioning Plan in July 2026 and received conditional approval on September 10, 2026. Genera was ordered not to commence decommissioning activities until an updated Plan specifying the actions taken to satisfy the established conditions was submitted for approval. Genera submitted the updated Plan on October 2, 2026. On October 15, 2026, the Energy Bureau approved the updated Plan, except for the modified project implementation timeline, for which it requested an explanation. Nevertheless, the Energy Bureau authorized implementation of the updated Plan. Accordingly, while implementation of the Decommissioning Plan has been authorized, the revised project timeline remains subject to the Energy Bureau's outstanding request for clarification.

ix. Procurement for both the Demolition and EPC contractors is ongoing. The demolition contract under RFP #5226 received P3A approval on October 23, 2026. Genera is currently completing the contract execution process, with the NTP expected to be issued in November 2026, following execution by the parties. Accordingly, the commencement of demolition activities remains dependent on completion of the contract execution process.

x. The EPC contract under RFP #5195, covering Peakers installation works at Yabucoa, Jobos, and Daguao, was submitted for stakeholder approval on October 15, 2026, and received P3A approval on October 30, 2026. However, the contract remains pending approval by FOMB. Genera will proceed with contract execution and subsequently issue the NTP upon receipt of the required approval. Consequently, the duration of the remaining approval process directly affects the commencement of EPC activities and the overall project schedule.

In addition to the regulatory and procurement requirements, the Yabucoa project remains subject to completion of the land transfer process with PREPA. Following discussions held on September 25, 2026, Genera, PREPA, and P3A identified the next

steps necessary to formalize the transfer. Genera anticipates providing a Memorandum of Understanding (MOU) for execution in November 2026. The completion of this process represents an additional administrative milestone affecting the advancement of the project.

f. Regulatory Approval and BESS Interconnection Process for Jobos and Daguao:

i. Retirement process formally initiated by Genera on August 23, 2024, under Article 16 of the LGA-OMA, followed by submission of a Decommissioning Plan (October 11, 2024) and an updated timeline (October 23, 2024).

ii. On November 4, 2024, LUMA concurred with the retirement and decommissioning plan for Jobos 1-1. However, LUMA objected to the retirement of Daguao 1-1 and 1-2, and Jobos 1-2 units. Although LUMA concurred with the decommissioning of Jobos Unit 1-1, demolition activities cannot commence due to the potential risks posed to the adjacent operating Unit 1-2. Consequently, the inability to proceed with the decommissioning of Jobos Unit 1-2 also prevents Genera from advancing demolition activities involving Unit 1-1.

iii. On January 7, 2025, LUMA reaffirmed its position, conditioning decommissioning on the addition of 810 MW of Replacement Capacity to the grid.

iv. Delays in the 800 MW Emergency Generation Project, managed by 3PPO, led Genera to submit a revised Unit Retirement Timeline strategy on September 19, 2025.

v. LUMA granted conditional approval to decommission equipment on January 26, 2026, pending BESS installation. LUMA has further required that batteries at Vega Baja and Cambalache be interconnected before Jobos and Daguao units can be decommissioned. As a result, the decommissioning of these units and the subsequent demolition and installation activities remain directly dependent on the completion of the BESS interconnection process. Below is the status of the interconnection timeline for Vega Baja and Cambalache:

   a. Facility Studies prepared by LUMA for Cambalache were received on September 10, 2025, and for Vega Baja on November 14, 2025.

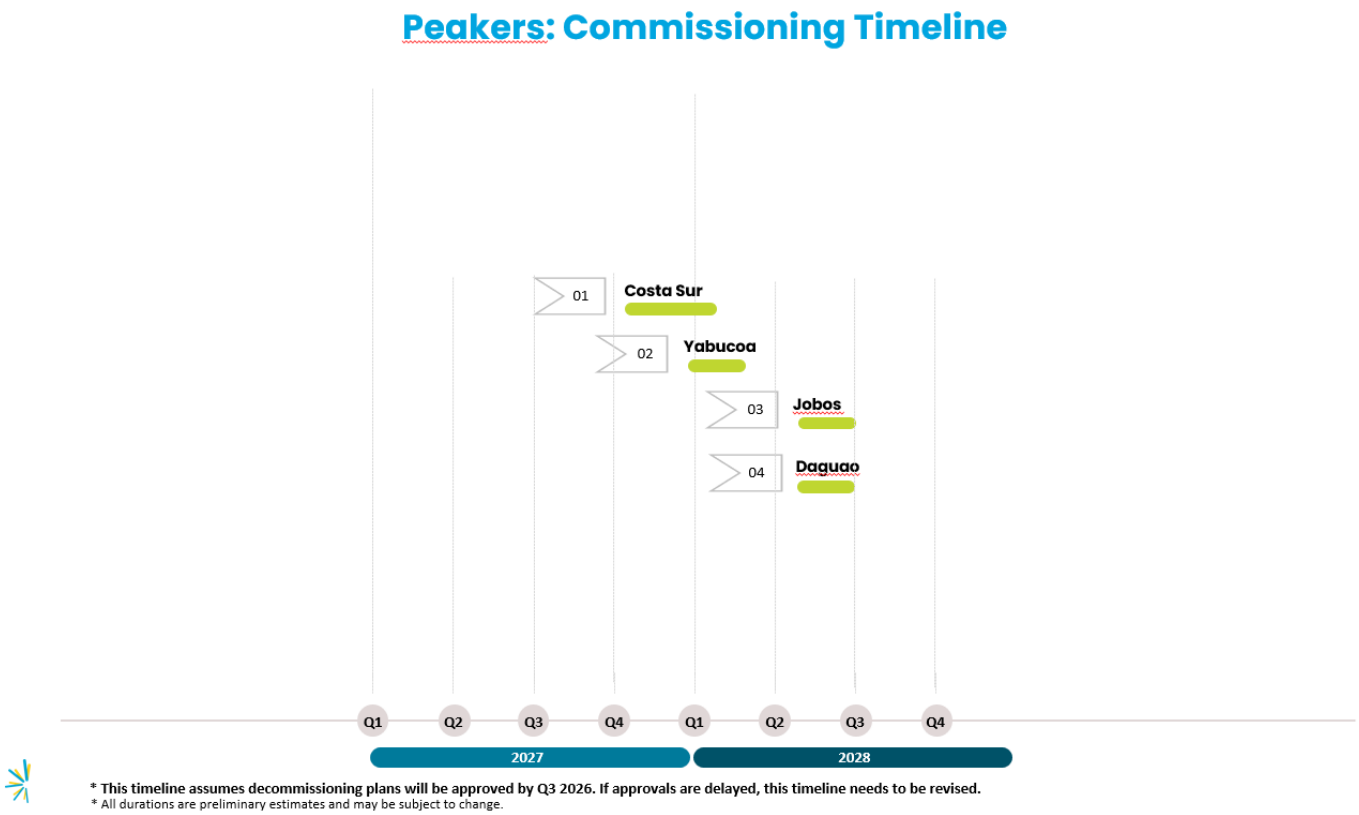
b. The Final SOW for both sites was approved and shared with LUMA on April 22, 2026. Following this approval, the projects advanced into design development, with the Cambalache contractor currently working on the 100% IFC design package and the Vega Baja contractor working on the 60% design package.
c. The completion of the remaining design, procurement, construction, and interconnection activities is necessary to satisfy LUMA's conditions for decommissioning the existing units. Accordingly, the Jobos and Daguao project schedules remain directly dependent on the progress and completion of the BESS interconnection works at Vega Baja and Cambalache.

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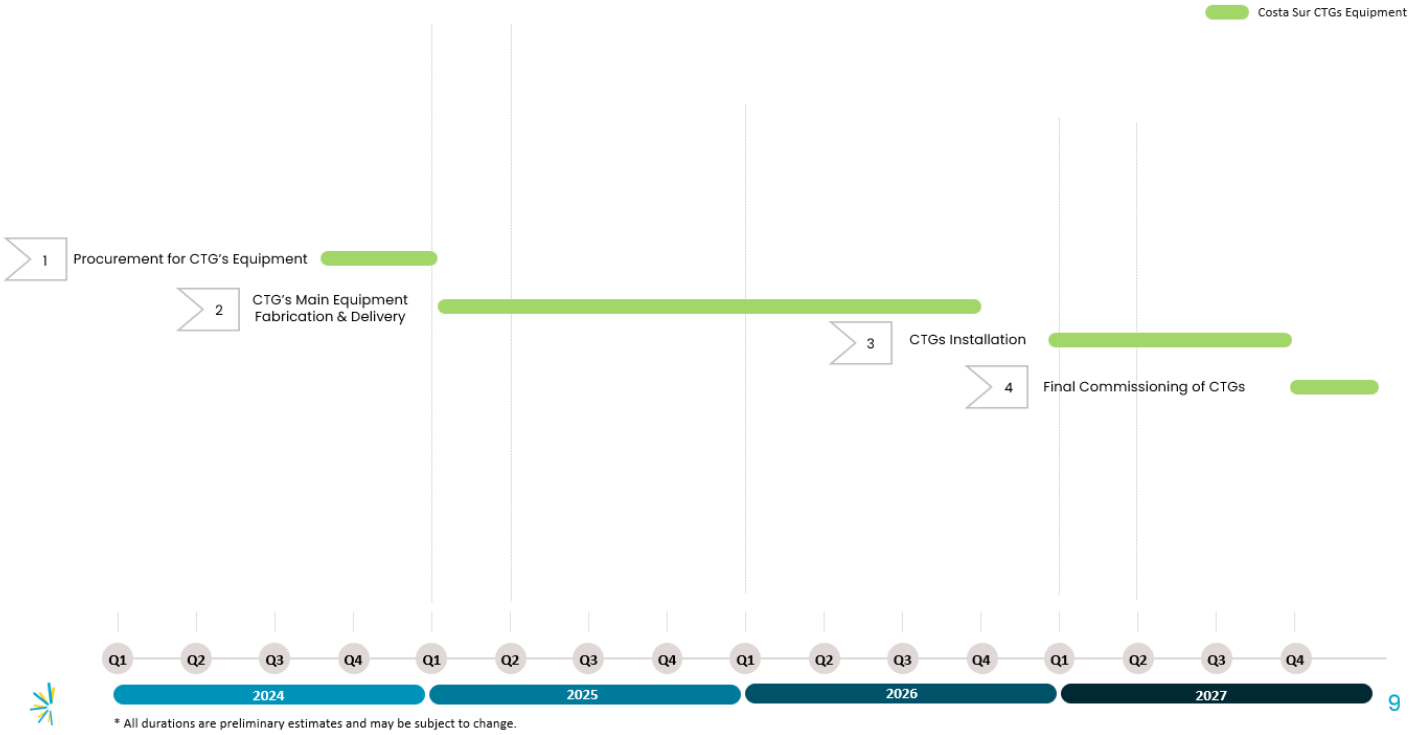
c. Project timeline chart *(e.g.* Gantt Chart) with critical path for the Commercial Operation Date ("COD") of the project.

Response:

Consistent with widely recognized construction industry practice, projected schedules are inherently dependent on predecessor activities and regulatory or operational milestones, many of which fall outside the owner's direct control, and, as such, all projected timelines must be adjusted as necessary to reflect delays arising from these external dependencies.

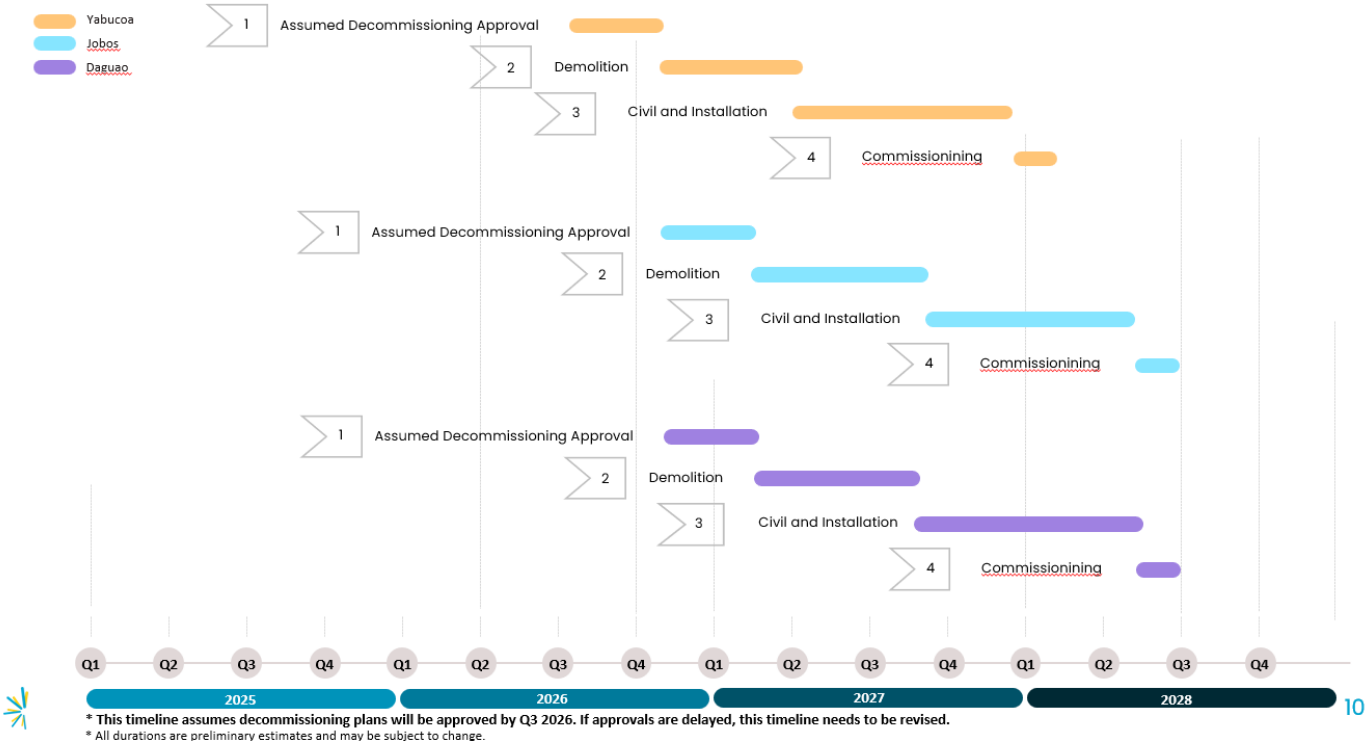


Peakers – Critical Path Timeline: Costa Sur



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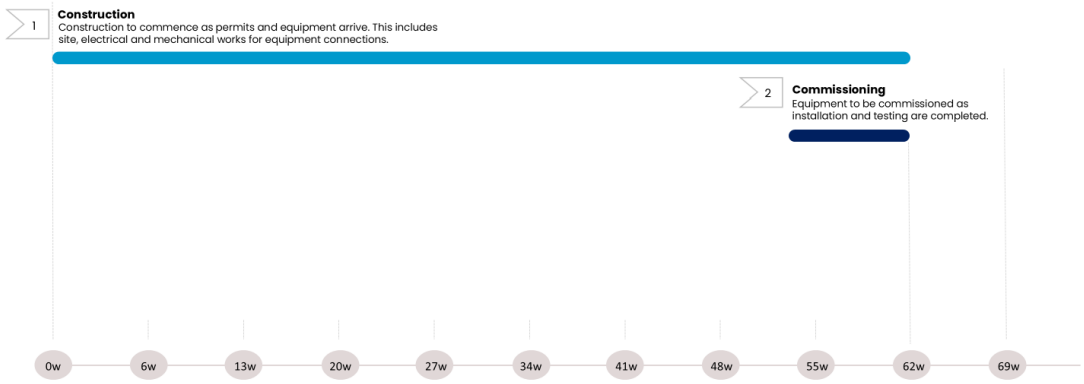
Peakers – Critical Path Timeline: Jobos, Yabucoa & Daguao



* This timeline assumes decommissioning plans will be approved by Q3 2026. If approvals are delayed, this timeline needs to be revised.
* All durations are preliminary estimates and may be subject to change.

250 Muñoz Rivera Ave, Suite 1200
American International Plaza
San Juan, PR 00918

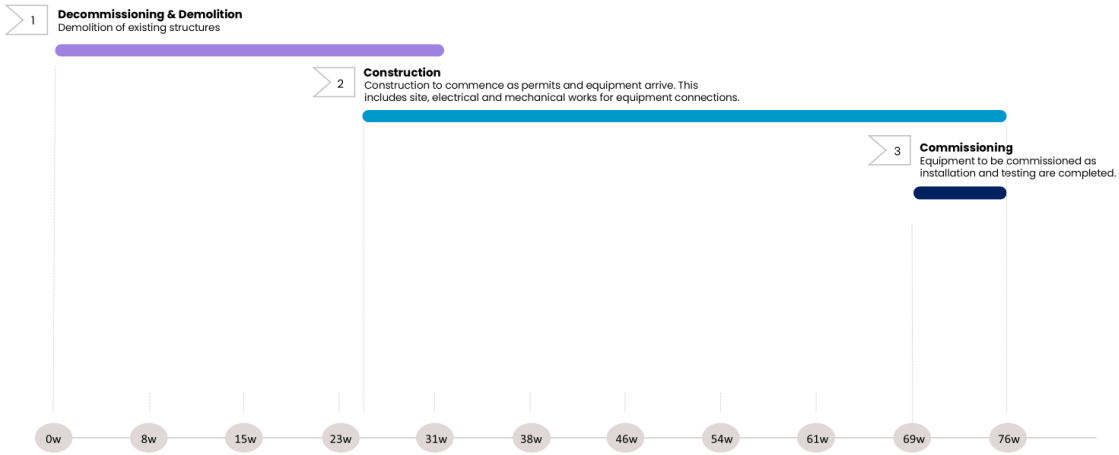
Costa Sur - Peakers Project Duration*
(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



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* All durations are preliminary estimates and may be subject to change.

Jobos, Yabucoa & Daguao - Peakers Project Duration*
(Assuming approvals for the LUMA Unit Retirement Checklist, Decommissioning Plan, FEMA, and EPA)



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* All durations are preliminary estimates and may be subject to change.

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d. Permit list, permits obtained, estimated timeline for each permit and status of such permit.

Response:

NEPA Permit Status [2]

Permit	Applicable Sites	Status	Approval
EHP NEPA Review (Record of Environmental Consideration expected)	All Peaker projects	DSOW submitted 09/18/2024.	09/25/2025
Coastal Zone Consistency Certification	Costa Sur	Peakers expected to be covered under FEMA and PRPB's existing blanket Coastal Certification (in effect until 2028)	Covered under FEMA's blanket Coastal Certification.
Biological Resources Endangered Species Act IESA)	All Peaker projects	Information submitted with DSOW.	09/25/2025
National Historic Preservation Act Consultation	All Peaker projects	Archeological reports submitted with DSOW.	09/25/2025

Federal Permits Status – Yabucoa, Daguao and Jobos [3]

Permit	Applicable Sites	Status	Submittal Date	Estimated Approval
Non-PSD Applicability Determination	Yabucoa, Daguao and Jobos	Application submitted to EPA for Daguao/Yabucoa/Jobos.	Amended on 11/12/2025. RFI's received on 12/05/2025 and 12/08/2025	Approved in March 2026.
NPDES Construction General Permit (CGP) for Storm Water	Yabucoa, Daguao and Jobos	Will be filed by Contractor, if applicable.	TBD	TBD
Determination of No Hazard to Air Navigation (FAA)	Yabucoa, Daguao and Jobos	Information submitted with DSOWC	TBD	TBD

[2] All dates are preliminary estimates and are subject to change.

[3] All dates are preliminary estimates and are subject to change.

Federal Permits Status – Costa Sur [4]

Permit	Status	Submittal Date	Approval
Non-PSD Applicability Determination	Application submitted to EPA.	11/26/2025	05/11/2026
NPDES Construction General Permit (CGP) for Storm Water	Will be filed by Contractor, if applicable.	TBD	TBD
Determination of No Hazard to Air Navigation (FAA)	Information submitted with DSOWC	TBD	TBD

Local Permits Status – Yabucoa, Daguao and Jobos [5]

Permit	Status	Submittal	Estimated Approval
DNER Rule 141 – Environmental Impact Document Documentation	Submitted on Oct. 18, 2024.	10/18/2024	All sites have been approved.
PRCF Fire Review *(optional)*	Genera will file upon receiving final design plans.	2026	60 days after submission
Permiso Unico Incidental (PUI)	Contractor will file.	TBD	30 days after submission
DNER Asbestos/Lead Removal	Contractor will file.	TBD	30 days after submission
Air Emissions Permit (PFE) for Construction	Genera will file during August 2026	TBD	TBD
Air Emissions Permit (PFE) for Operation	Genera will file after receiving PFE for Construction approval and completing installation of emission sources.	TBD	Q4 2026

[4] All dates are preliminary estimates and are subject to change.

[5] All dates are preliminary estimates and are subject to change.

Local Permits Status – Costa Sur [6]

Permit	Status	Estimated Submittal Date	Estimated Approval
DNER Rule 141 – Enviromental Impact Documentation	Approved	July 2025	10/16/2025
PRCF Fire Review	Genera will file upon receiving final design plans.	TBD	60 days after submission
Permiso Unico Incidental (PUI)	Contractor will file.	TBD	30 days after submission
DNER Asbestos/Lead Removal	Submitted on February 9, 2026	02/09/2026	30 days after submission
Air Emissions Permit (PFE) for Construction	Genera will file during August 2026	TBD	TBD
Air Emissions Permit (PFE) for Operation	Genera will file after receiving PFE for Construction approval and completing installation of emission sources.	TBD	TBD

[6] All dates are preliminary estimates and are subject to change.

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e. Tasks required in preparation for each site where the project shall be installed. Details on any demolition and permits required in preparation for the installation of the project.

Response:

See responses to questions a through d.

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f. Permit and cost for each site to accommodate the project.

Response:

NEPA Permit Costs [7]

Permit	Applicable Sites	Estimated Cost
EHP/NEPA Review	All Peaker sites	$150,000 for all sites. Includes EHP Review coordination
Coastal Zone Consistency Certification	San Juan; Costa Sur	$8,000/site
Biological Resources Endangered Species Act (ESA) Section 7	All Peaker projects	$15,000/site
National Historic Preservation Act Consultation	All Peaker projects	$15,000/site

Federal Permit Costs [8]

Permit	Applicable Sites	Estimated Cost
Non-PSD Applicability Determination	Yabucoa, Daguao & Jobos	$12,000/site
Air Modeling and PSD Application	Costa Sur	$180,000
NPDES Construction General Permit (CGP) for Storm Water	All Peaker projects	$21,000/site
Determination of No Hazard to Air Navigation (FAA)	All Peaker projects (when applicable)	Included in DSOW

Local Permit Costs [9]

Permit	Applicable Sites	Estimated Cost
DNER Rule 141 – Environmental Impact Documentation	All Peaker projects	$35,000/site
PRCF Fire Review	All Peaker projects	$3,000/site
Permiso Unico Incidental (PUI)	All Peaker projects	$25,000/site
DNER Asbestos/Lead Removal	All Peaker projects	$15,000/site
Air Emissions Permit (PFE) for Construction	All Peaker projects	$20,000/site
Air Emissions Permit (PFE) for Operation	All Peaker projects	$10,000/site

[7] All costs are preliminary estimates and are subject to change.
[8] All costs are preliminary estimates and are subject to change.
[9] All costs are preliminary estimates and are subject to change.