



GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC-PRIVATE PARTNERSHIPS AUTHORITY

July 1, 2024

BY ELECTRONIC MAIL

Mario Hurtado

Chief Regulatory Officer
mario.hurtado@lumapr.com

with copy to:

LUMA Energy, LLC

General Counsel
legal@lumamc.com

Re: IRP

Reference is made to the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020 (“T&D O&M Agreement”) among (i) the Puerto Rico Electric Power Authority (“PREPA”), (ii) the Puerto Rico Public-Private Partnerships Authority (“P3A”) and (iii) LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”). Reference is also made to LUMA’s June 7, 2024, *LUMA Motion Requesting the Continuance of the Deadline for the 2024 IRP Filing (“Continuance Motion”)* and *Motion Submitting Responses to the Third Set of IRP Prefiling Period Requests of Information and Requests for Confidential Treatment (“Response Motion”)*. Terms not defined in this letter shall have the meanings ascribed to them in the T&D O&M Agreement.

Pursuant to Section 6.2(v) of the T&D O&M Agreement, P3A requests LUMA provide the information requested below by no later than July 12, 2024:

1. Explain why it took so long to identify that Black & Veatch’s (“B&V”) modeling software had issues/errors.
2. Please confirm that scenarios will be ready and fully modeled by August 2024 including generator schedule and retirements.
3. B&V included a GE 7HA.02 model gas turbine for the modeling although LUMA was aware and had the data sheets and machine data for the Siemens and Mitsubishi turbines that the bidders proposed for the CCGT plant. Please

explain the rationale for using a GE model gas turbine versus the bidders' submitted proposals using Siemens or Mitsubishi turbines.¹

4. The loss of load expectation/probability (“LOLP” or “LOLE”) calculation used 1 day in 10 years². LUMA has shown as more likely to be 37.5 Days per year or 375 times industry standard. (See RA study from November 2023). Please explain the rationale for this approach.³
5. The temporary generation units have been shown as a firm 340MW resource despite short-term permitting uncertainty. Please explain the rationale for this approach, and how it is assumed that these units will be permitted for long term operation.⁴
6. The Legacy Generation Assets are shown with highly optimistic and reportedly supportable forced outage rates that are not consistent with LUMA’s Resource Adequacy study. Please explain how this was determined for each unit.
7. The new Combined Cycle Gas Turbine is discussed with operation in 2030. Please explain the rationale for specifying 2030.⁵

Respectfully,



Rubén Lugo
Compliance and Contract Manager
Puerto Rico Public-Private Partnerships Authority

¹ See Continuance Motion page 24.

² This is an interconnected US utility standard which is not suitable for island applications.

³ See Continuance Motion at pages 18, 19, 21 and 27.

⁴ See Response Motion at pages 17-18.

⁵ See Response Motion at page 23.