



Periodic Update #9

June 10, 2023

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I. Overview

In accordance with Section 4.2(i) *Periodic Reports* of the Operation and Maintenance Agreement (OMA), Genera PR LLC (Genera) hereby submits to the Puerto Rico Public-Private Partnership Authority (P3A) the Periodic Report #9 which includes updates on the Mobilization Plan, completed obligation and provides updates on the Handover Checklist per Section 4.2(b) *Handover Checklist* of the OMA. Information regarding the Handover Checklist and Media Communications is in the appendices.

II. Executive Summary

The Periodic Report #9 for June 10, 2023, includes Genera's progress through the mobilization phase. As of Friday, June 9th 2023, a total of 900 offers have been extended as part of our hiring effort. 590 offers have been accepted. Genera recruitment efforts are focused on filling key roles by June 30th. A successful candidate track for 31 roles posted is supporting the hiring plan. Expecting to onboard 650 employees by commencement day.

III. Commercial Report

Completed Mobilization Period OMA Obligations

This section shows the OMA obligations completed in the past two weeks only. All previous weeks' completed OMA obligations have been removed to minimize the length of the report.

Section	Description	Responsible Party	Status
4.2(e)	Legacy Generation Emergency Response Plan	Genera PR LLC (Operator)	Completed
4.2(j)	Consumables, Spare Parts and Capital Spare Parts	Genera PR LLC (Operator)	Completed
4.2(v)	Annual Performance Test	Genera PR LLC (Operator)	Completed
4.5(b)	Approval of Operations and Maintenance Proc.	P3A	Completed

IV. Mobilization Process Update

Personnel and Training

- Operator Training Program was approved by P3A on May 31, 2023.

Stakeholder Engagement

- Meeting/briefing with Representatives Eddie Charbonier, Victor Pares, Jose "Cheito" Hernandez
- Meeting/briefing with Secretary of Public Security Department, Chief of Police Department and Chief of State Emergency Management Agency
- Meeting/briefing with Spain Commercial Office in PR
- Meeting/briefing with FEMA Director and Fortaleza
- Meeting/briefing with COR3 Director
- Attended and update on mobilization process at PR Shipping Association monthly meeting
- Attended weekly meetings with Fema's Grid Stabilization Task Force

Information Technology

- List of transition employees for access provisioning provided to LUMA on 6/1/2023 (559 total transition employees). Continued work with LUMA on specific access needs and procedures for Day 1 access to applications and data through the Shared Services Agreement.
- Working group established for pre-commencement and post-commencement telecommunications infrastructure and networking. Meeting held between LUMA and Genera on 5/31/2023 with focus on Site Access Policies, Shared Infrastructure Separation, and Telecommunications Availability.
- Detailed scoping sessions held with Hitachi Energy regarding Asset Suite implementation. Stakeholders from Operations, Procurement, HSSEQ, and generation facilities were included to define improvements and additional use cases for the critical CMMS and EAM software.
- Dedicated private fiber connection between Genera's corporate network and Hub Advanced Networks initiated with the contract review in progress.
- Enhanced employee productivity tools were evaluated and are in the process of being implemented for Genera PR (workflow, document management, and e-signature tools).
- Contract evaluation and execution is in progress with partner selected for ERP & EAM application separation during the six-month Shared Services period.
- Completed plan for IT system actions to support Physical Security at corporate office and plants on Day 1. The vendor currently providing services to PREPA and LUMA has been engaged and Genera is evaluating different cost options.
- Created plan and matrix for IT Support and escalation processed on Day 1 of commencement.
- Refined scope for timekeeping & payroll biometric clock installation including communications paths. Initiated contracting for implementation.
- Onboarded Day 1 IT support vendor for transition of domains, Active Directory accounts, and Application access.
- Met with Cybersecurity and Infrastructure Security Agency (CISA) to discuss potential evaluations and support strategies including collaboration with LUMA and PREPA HoldCo.
- Access to Aveva PI remains a consistent challenge; Genera are working through access requests and visibility to the system with PREPA and LT Automation.

- Further refinement of key site-by-site IT documentation including recommendations is in progress.
- A detailed scoping of data architecture to support enhanced reporting and visibility to key performance indicators has been initiated with two potential partners.

Inventory

- Spare parts list was submitted to P3A on June 1, 2023. Comments were received and are being incorporated to resubmit to P3A by June 12, 2023.

Finance, Procurement & Accounting

1. FY2024 GenCo Operating Budget:
 - a. Prepared for PREB bearing to present FY2024 operating budget on 6/9/2023.
 - b. Working through reappropriation of line items following communication from Luma of an \$11m increase to insurance expense which is included in the shared services fees
2. Fiscal Plan 2024
 - a. On-going development of supporting schedules and analysis of cost analysis for the fiscal plan
3. Rate Case August 2023:
 - a. Beginning discussions with LUMA for development of the 2023 rate case
 - b. Commencing process to extend budget estimates to FY 2025
4. Working with PREPA & LUMA for cut-over procedures
 - a. Obtained the list of open PO, projects, and contracts from LUMA. Working to review the list to determine transactions that will be pen at cut-over and assigning the appropriate cut-off.
 - b. Reconciling open POs, projects, and contracts to cash on hand to determine appropriate funding within the service accounts.
 - c. On-going to document desk-top procedures for commencement, clarifying roles and responsibilities of each team – P&L split is finalized, working through project accounting and balance sheet accounts
 - d. All service accounts have been opened.
5. Finalizing interviews for key positions, and making final decisions on the short list for: Controller and Director, FP&A

6. Invoice manual is in final review and anticipated to be shared shortly.
7. Continuing to work on master data mapping with ADP for DI labor costs.

Environmental Permitting/ Safety Programs

GeneraPR has received an additional 18 permits and compliance plans which had previously been in gap. We are 90 percent complete in deconstructing those documents and creating compliance calendar actions in accordance with the requirements set forth therein. The remaining permits which have not yet been provided are not material for service commencement. GeneraPR has completed all the requirements review and verifications with SMS360 – the centralized program which we will utilize for HSEQ management needs. Test runs have been successful of the uploads of compliance calendar action items and we are working to upload the remaining actions. Once complete, we will have a mechanism to track compliance and ensure follow-through on submittals and other requirements. The system will also capture all incident reporting, investigations, permit-to-work, management of change, and key regulatory inspections.

In preparation for transition into O&M services, GeneraPR continues to procure critical safety equipment. Following the completion and approval of the Health & Safety and HazMat Manual, training programs have been developed and are ready to be implemented. GeneraPR has finalized and submitted for formal review and acceptance, the Legacy Emergency Response and Action Plan. In conjunction with this, GeneraPR has commenced internal planning as we head into hurricane season.



V. Expenditures Update

Note to report: Genera recognizes the requirements to report on mobilization budget analysis as outlined in Appendix IX Section V(B)(3) Accounting and Reporting and will provide monthly reports as required. Below is the budget and analysis to date.

Genera - Mobilization Phase | Weekly Finance Summary

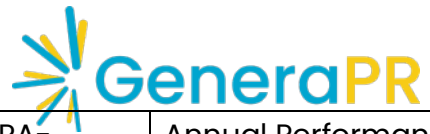
ID #	Budget Category	Budget		Paid to Date	Remaining (Unpaid)	
		Orig Budget	Forecast	Actual Paid	Committed (via PO)	Uncomm. (no PO)
100	Communications	250,000	247,740	112,703	225,522	22,218
200	Facilities	200,000	52,256	-	94,555	-
300	Finance	360,000	521,000	123,893	452,107	-
400	HSSEQ	790,000	822,537	67,317	578,306	244,231
500	Human Resources	1,420,000	1,511,942	698,612	1,511,942	-
600	Insurance	50,000	43,196	43,196	43,193	-
700	IT	900,000	900,000	10,920	634,273	265,727
800	Legal & Compliance	3,600,000	1,750,000	349,000	849,466	900,535
900	Power	6,100,000	7,867,212	1,580,768	5,980,860	1,886,352
1000	Procurement	530,000	400,000	50,000	400,000	-
1100	T&E	300,000	376,806	-	-	489,000
1200	Project Management Fees	500,000	525,996	-	-	421,795
Total		15,000,000	15,018,684	3,036,409	10,770,224	4,229,857



VI. Submissions Update

Transmittals – April 24, 2023, to May 10.2023

Name	Description	Sending Org.	Receiving Org.	Genera Dept.	Created
PREPA- GENERA- 00006	Authorized PREPA and Genera PR LLC Officers Firstbank Accounts	PREPA	Genera	PM	5/25/2023 4
GENERA- PREPA-00031	Outage and Maintenance Program and Fuel Orders and Nominations	Genera	PREPA	PM	5/31/2023 3
P3A-GENERA- 00019	Operator Training Program Approval	P3A	Genera	PM	5/31/2023 3
GENERA-P3A- PREB-00002	Legacy Generation Emergency Response Plan Submission	Genera	P3A/PREB	PM	6/1/2023
GENERA- PREPA-P3A- 00010	Owner Service Date Commencement Date Conditions	Genera	PREPA/P3A	PM	6/1/2023
P3A-GENERA- 00020	Operations and Maintenance Procedures Approval	P3A	Genera	PM	6/1/2023
GENERA- PREPA-00032	Consent Decree and Environmental Compliance	Genera	PREPA	PM	6/1/2023
GENERA-P3A- PREB-00003	Consumables, Spare Parts, and Capital Spare Parts Submission	Genera	P3A/PREB	PM	6/1/2023



GENERA- PREB-00004	Annual Performance Test Submission	Genera	PREB	PM	6/5/2023
GENERA- PREPA-00033	Puerto Rico Thermal Generation Facilities	Genera	PREPA	PM	6/6/2023
GENERA- PREPA-00034	Unreasonable Approval / Review Timelines	Genera	PREPA	PM	6/6/2023
GENERA-P3A- 00024	Notice of Genera PR LLC Formal Communications Protocol	Genera	P3A	PM	6/7/2023



VII. Areas of Concern / Items of Interest

Areas of concern

Genera recognizes the requirements to advise on items of interest and potential areas for concern as outlined in Section 4.2(i) Periodic Reports. As Genera approaches Service Commencement Date, it has identified the following areas of concern which it has notified Owner through previous correspondence:

- (1) Facility Contracts (identification, notices, Fuel Contracts, etc.)
- (2) Governmental Approvals
- (3) Delivery of Fuel
- (4) Baseline Environmental Study
- (5) Spare Parts List

As this information directly impacts Genera's ability to effectively commence service as agent of Owner, Genera requests that Owner address the above areas of concern as soon as possible.

Appendixes

A. Mobilization Stakeholder Engagement

Mobilization Stakeholder Engagement		In Contact	Initial Briefing	Regular Dialogue	Notes
Federal Agencies					
2	FEMA	Yes	Yes	Yes	Weekly Grid Stabilization Task Force, Disaster Preparedness, BEOC meetings
3	DOE	Yes	Yes	Yes	Met with DOE Secretary. Multiple meetings/briefings with DOE PR Director
4	US Army Corps	Yes	Yes	Yes	Multiple Meetings
5	EPA	Yes	Yes	Yes	Meeting with EPA Caribbean Director
6	White House	Yes	No	No	
7	FBI	No	No	No	Meeting to be scheduled
8	Homeland Security	Yes	Yes	No	Meeting/briefing
9	OSHA	Yes	Yes	No	
10	DOJ	No	No	No	
11	FOMB	Yes	Yes	Yes	Meeting/Briefing with FOMB Executive Director
Puerto Rico Agencies / Energy Stakeholders					
13	P3A	Yes	Yes	Yes	Weekly Coordination Meetings
14	Governor Pedro Pierluisi	Yes	Yes	Yes	Meetings/Briefings on progress
15	Governor's Chief of Staff	Yes	Yes	Yes	Meetings/Briefings on progress
16	Governor's Energy Affairs Office Director	Yes	Yes	Yes	Meetings/Briefings on progress
17	PR Ports Authority	Yes	Yes	Yes	Meeting/Briefing
18	PREPA	Yes	Yes	Yes	Daily Meetings, Bi-Weekly Coordination Meetings
19	LUMA	Yes	Yes	Yes	Daily Meetings, Weekly Coordination Meetings
20	AAFAF	Yes	Yes	Yes	Regular Meetings
21	COR3	Yes	Yes	Yes	Weekly Meetings
22	PREB	Yes	Yes	Yes	Briefings/Reporting
23	PUBLIC SECURITY UMBRELLA COMMISSIONER	Yes	Yes	No	Meeting/briefing on transition and security measures
24	PR Police Department	Yes	Yes	No	Meeting/briefing on transition and security measures
25	AEMED (PR EMERGENCY MANAGEMENT AGENCY)	Yes	Yes	No	Meeting/briefing on transition and Hurricane preparedness
26	PR Treasury Department	Yes	Yes	No	Meeting/Briefing on progress
27	PRDRNA	No	No	No	Meeting to be scheduled
US Congress					
29	House Committee on Natural Resources	Yes	No	No	Reached out, haven't scheduled meetings yet
30	PRAFAA	Yes	No	No	Reached out, in process to schedule in person meeting
31	Senate Committee for Energy a& Natural Resources	Yes	Yes	No	Met with individual Senators, not committee staff
32	Hispanic Caucus	No	No	No	pending to schedule
33	Rep. Jennifer González Colón	Yes	No	Yes	Scheduling first briefing
PR Legislature					
35	President of the House	Yes	Yes	No	Transition Meeting/briefing with Rafael Tatito Hernandez/Visits to Cambalache and Aguirre
36	President of the Senate	Yes	Yes	No	Meeting/briefing with President of the Senate
37	House Majority Leader	Yes	Yes	No	Initial conversations
38	Senate Majority Leader	Yes	Yes	No	Meeting/briefing with Sen. Javier Aponte Dalmau
39	House Minority Leader	Yes	Yes	No	Meeting/briefing with Rep. Johnny Mendez and Rep. Victor Parez
40	Rep. Eddie Charbonier, Rep. Victor Parez, Rep. Jose Hernandez	Yes	Yes	No	Meeting/briefing
41	Rep. Jose Pichy Torres	Yes	Yes	No	Meeting/briefing
42	Rep. Jose Quiquito Melendez	Yes	Yes	No	Meeting/briefing
43	Rep. Jose Memo Gonzalez	Yes	Yes	Yes	Attended public hearing on Prepa/Arecibo project
44	Chair of Labor Committee-House	Yes	Yes	No	Ask to be updated after offer letters process to plant employees
45	Chair of Preparation, Reconstruction and Reorganization Committee-House	Yes	Yes	No	Meeting/briefing with Rep. Luis Ortiz
46	Senate Minority Leader	Yes	Yes	No	Meeting/briefing with Sen. Thomas Rivera Schatz
47	Senator Vargas Vidot	Yes	Yes	No	Meeting/briefing
48	Senate Energy Commission	Yes	Yes	No	Attended Public Hearing on May 9th.
49	House Energy Commission	Yes	Yes	Yes	Public Hearing 2/9; Responded to multiple RFI's
50	House Joint Commission Public Private Alliances	Yes	Yes	Yes	Plant tour Cambalache

51	Puerto Rico Municipalities				
52	Association of Mayors	Yes	No	No	Scheduling first briefing
53	Federation of Mayors	Yes	Yes	Yes	Meeting/Briefing with president/Mayor of Camuy
54	Mayor of Caguas	Yes	Yes	No	Meeting and briefing
55	Mayor of Salinas	Yes	Yes	No	Scheduling 2nd Meeting with Ops team on Aguirre
56	Mayor of Humacao	Yes	Yes	No	Meeting and briefing
57	Mayor of Naguabo	Yes	Yes	No	Meeting and briefing
58	Mayor of Vega Alta	Yes	Yes	No	Agreed on keeping constant communication on plant operation
59	Mayor of Toa Baja	Yes	Yes	No	Agreed on keeping constant communication on Palo Seco and will address issue of plant water pumps
60	Mayor of Loiza	Yes	Yes	No	Meeting and briefing
61	Mayor of San Juan	Yes	Yes	Yes	Meeting and briefing
62	Private Sector Stakeholders & Academia				
63	PR Manufacturers Association	Yes	Yes	Yes	Official Genera Presentation/Participation on Energy Panel at Annual Convention
64	PR Pharmaceutical Industry Association (PIA)	Yes	Yes	No	Official Genera Presentation to the board and Plants Facilities and Government Relations teams
65	PR Colegio de Ingenieros y Agrimensores	No	No	No	
66	PR Colegio de Contadores Publicos Autorizados	Yes	No	No	
67	PR Colegio de Peritos Electricistas	No	No	No	
68	PR Telecommunications Alliance	Yes	No	No	Presentation to be scheduled
69	PR Chamber of Commerce	Yes	Yes	Yes	Official Genera Presentation/Participation on Energy and PPA's Panels at Annual Convention
70	PR Navieros Association	Yes	Yes	Yes	Official Genera Presentation, update on Hurricane preparedness
71	PR Retailers Association	Yes	Yes	No	Official Genera Presentation/Attended May 2023 board meeting to discuss status on Legacy Generation Assets
72	PR Bankers Association	Yes	No	No	Initial contact and scheduling presentation to the board
73	PR Hotels & Tourism Association	Yes	Yes	No	Official Genera Presentation
74	Colegio de Ingenieros y Agrimensores	Yes	No	No	
75	PR Automobile Industry Association	Yes	No	No	
76	PR Hospital Association	Yes	No	No	
77	PR Farm Bureau	Yes	No	No	
78	PR Construction Materials Association	Yes	Yes	No	Official Genera Presentation
79	PR 100	Yes	Yes	No	Attending group meetings
80	Justicia Energetica	Yes	Yes	No	Official Genera Presentation
81	PR Restaurants Association	Yes	Yes	Yes	Official Genera Presentation
82	Made in PR Association	Yes	Yes	Yes	Official Genera Presentation
83	PR Small Business Association	Yes	No	No	
84	PR Builders Association	Yes	Yes	No	Participation in Energy Panel on March 28. Presentation to the board on May 3
85	Associated General Contractors (AGC) PR Chapter	Yes	Yes	No	Meeting and briefing with President and Executive Committee
86	PR Food Wholesalers and Supermakets Association	Yes	No	No	
87	AES	Yes	Yes	Yes	Meeting with president of AES
88	Eco Electrica	Yes	No	No	
89	PR Coalition for Food Security	Yes	No	No	
90	SESA Solar & Energy Storage Association	Yes	No	No	
91	US-Lulac	No	No	No	
92	US-Unidos	No	No	No	
93	US-Hispanic Federation	Yes	No	No	
94	US-National Hispanic Caucus of State Legislators (NHCSL)	Yes	Yes	No	Represented Genera at NHCSL energy session
95	PR Energy System Recovery & Resilience Advisory Group	Yes	No	No	
96	South East & Caribbean Disaster Resilience Partnership	Yes	No	No	
97	BEOC (PR Business Emergency Operations Center)	Yes	No	No	Attended FEMA/BEOC Energy & Fuel Sector Meeting
98	University of PR (Mayaguez Engineering School)	Yes	No	No	
99	Ana G. Mendez University (Engineering School)	No	No	No	
100	Politechnical Universty (Engineering School)	Yes	Yes	No	Working on MOU for engineering students practice
101	PR Rotary Club	Yes	Yes	No	Participation in Energy Panel
102	Puma Energy Company	Yes	Yes	No	Official Genera Introduction with PUMA/TEXACO Management team
103	Media-El Vocero	Yes	Yes	No	Meeting with President of El Vocero
104	Invest PR	Yes	Yes	No	Official Genera Presentation

B. Handover Checklist Update

PRELIMINARY CHECKLIST ITEM	Required for O&M Services? (Y / N)	Start Date	Due Date	Progress (% Complete)	Completed? (Y / N)	Amt Spent (US\$)	Status Notes
1 People Management (Applicable to Critical Positions Only)							
Staffing completed	N	2/13/2023	5/30/2023	75%	N		The Periodic Report #9 for June 10, 2023, includes Genera's progress through the mobilization phase. As of Thursday, June 10 2023, a total of 900 offers have been extended as part of our hiring effort. 590 offers have been accepted. Genera recruitment efforts are focused on filling key roles by June 30th. A successful candidate track for 31 roles posted is supporting the hiring plan. Expecting to onboard 650 employees by commencement day.
Orientation to Genera PR completed (incl training on role & responsibility)	Y		5/30/2023		N		As part of orientation efforts, benefits orientations were initiated last week of May and will conclude
Skill Assessment Completed	Y		4/24/2023	100%	Y		All technical assessments of legacy staff completed, with focus on the Critical Positions
Training and Development Plan created	Y	2/15/2023	5/24/2023	100%	N		Operator Training Program was submitted on May 24, 2023
Training commenced (program in place)	Y	5/24/2023	6/24/2023	0%	N		Program will be implemented after Training and Development plan is created and approved. The execution of the training plan will be in full alignment and based on the results of the individualized employee evaluations. Due to timing of access to employees as well as program readiness, training will not be completed until after service commencement date. That said, the program will be executed with prioritization of needs to safely and effectively execute job tasks and again, will be balanced back against the results of the employee evaluations. To ensure success, sufficient time will be allotted and scheduled as shift scheduling will account for expertise to be in place to ensure ample coverage and avoid any deficiencies in skill set.
All new personnel have completed applicable training program	N	6/24/2023	Ongoing	N/A	N		The vast majority of the staff are expected to be employees transitioning from PREPA. For this line item, new employees who are externally recruited will undergo training as part of the onboarding process. Some employees may only be onboarded until after service commencement, however, Genera is committed to ensuring training is completed before the employee commences in full, their role.

8	Procedures						
9	New Procedures created (if applicable)	Y		4/24/2023	100%	Y	O&M procedures were approved by P3A on June 1, 2023
10	Site and department-level procedures have been implemented - including applicable Emergency Response Plans, Fuel Supply Management Plans, and applicable O&M Procedures	Y	2/1/2023	6/24/2023	25%	N	Genera has identified and commenced the development of various site-level requirements which are at different stages of review and finalization. The centralized emergency response plan has been submitted and reviewed as a working draft and comments/additions are currently being addressed. Expected completion and submission is by 5/19/23. Genera has started the development of the fuel supply management plan which remains a work in progress at this time. In support of this effort, existing contract reviews have commenced in conjunction with PREPA.
11	Contracts						
12	Review of applicable contracts	N	2/15/2023	6/30/2023	50%	N	Currently reviewing all applicable contracts with the aim of aligning on post-service commencement utilization. There has been a potential gap identified regarding localized contracts (those entered into at a plant level) which may not have been recorded at a corporate level (PREPA). Genera is working with PREPA to address this potential gap.
13	Determinations of contracts - Retention of existing contracts - New contracts entered	N	2/15/2023	6/30/2023	50%	N	Taking place in parallel with the review where possible. Applicable existing contracts are being extended for six months beyond June 30, 2023. This is a process being coordinated and handled by PREPA. Meetings have been held between PREPA and Genera to ensure transparency and efficiency in this process. During the extension, Genera will execute against procurement strategies to identify opportunities for savings/optimization heading into what will be the new contract period.
14	Contractor partners in place to support O&M needs	Y		6/30/2023	100%	Y	Contractor partners in place
15	Project and Workload Management						
16	Work Management System implemented	Y		6/30/2023		N	Based on evaluations of systems, processes, and overall requirements, Genera is opting to utilize and improve the current system (Asset Suite) as this will allow for ease of transition and minimize disruption heading into service commencement. Genera is developing the execution plan for this migration and improvement opportunities. Further, Genera is in the process of finalizing a transition plan which addresses needs through the final aspects of mobilization into the first 60-days of service commencement. Although this plan will cover a variety of key areas, attention is being paid towards work plans, in which Genera has started communications with PREPA to gain a better understanding of current work scheduled, any major projects which will need to transition mid-effort, and projects which are held based on waiting for goods or provider support.
17	Project teams in place with training items 4+ weeks out	N		6/30/2023		N	
18	Work plans for first 4 weeks identified	Y		6/30/2023		N	
19	Introductory meeting with Plant Technical Services lead and the Pod Manager supporting the specific plant	Y		5/30/2023		N	
20	Plant Manager and Pod Manager agreed on formed project teams	Y		5/30/2023		N	

21 HSSE and Regulatory Compliance							
22	Permit and current status of compliance reviewed with PREPA functional area leads (with HSSE Support)	Y	2/8/2023	4/30/2023	100%	Y	All permits have been reviewed. There are some minor gaps which will require further investigation and review, however, based on what has been provided, the review is materially complete.
23	Risk assessments reviewed with PREPA functional area leads and updated where necessary	Y	2/22/2023	5/31/2023	30%	N	Working sessions with PREPA continue. Site visits held over the last two weeks to allow for further assessment and context. Genera has engaged a third-party to complete IE/Condition reports at a plant-level basis. The San Juan report has been received and is being reviewed. Awaiting further site reports.
24	Safety and HazMat Manual implemented and trained on	Y	2/8/2023	6/24/2023	90%	N	H&S and Haz Mat Manual has been submitted for formal review by P3A. P3A has returned their review and edits have been made, with the manual now in the process of being resubmitted. The training aspect of this line item is being addressed as part of lines 5 and 6 of this checklist. Training modules have been developed. Once accessibility to employees is in place, training can commence.
25	Permits reviewed and deconstructed with HSSE support	Y	2/8/2023	6/1/2023	100%	Y	All permits which have been provided to Genera have been reviewed and deconstructed. There are certain permits which remain undelivered, which will require agency requests to obtain. Critical permits (Title V/PSD air permits and NPDES) have been received/deconstructed. Genera is now in the process of taking the deconstructions (which made the permit conditions actionable) into a HSEQ Management System known as SMS360. Genera is completing a final QAQC on the deconstruction and have commenced test task uploads to ensure functionality and efficiency in the upload process. At this point, 1700 action items have been identified for upload (does not include replication due to frequency requirements).
26	Authorized Operator/Signatory changed to Genera PR on applicable permits	N	2/23/2023	5/5/2023	70%	N	Genera has commenced engagement with EPA around the Consent Decree. Genera is working with PREPA to commence the process of sending out notifications to issuing agencies. The action to do the agency notification sits with PREPA. There will be no transfer of permits but rather notification appointing Genera as the operator of record and authorized reporter/signatory to the permit for compliance matters.
27	For sites under jurisdiction of the Consent Decree, EPA has authorized Genera as Operator	Y	2/7/2023	5/19/2023	10%	N	Genera held initial meeting with EPA to socialize our team, strategy, and discuss priorities. Working with PREPA to appoint Genera as the Operator of Record continues.

28	IT						
29	Transition of FCC licenses	Y		5/19/2023	90%	N	Genera has completed the FCC registration process and FRN has been granted. Genera has linked accounts with PREPA to allow for full utilization. License association is currently in progress.
30	Established DOA from PREPA to Genera PR to reassign account accesses, where applicable	Y		5/31/2023	45%	N	Business teams have been engaged to drive the process. Working through DOA and access in Asset Suite and E-Business Suite. Meetings have been held with LUMA to refine details regarding master data mapping (5/8/23) and system security profile alignment (5/11/23). Over the course of the next week, we will confirm access requirements with LUMA for day 1 commencement, which will be done in working session meetings.
31	LUMA Coordination						
32	Communication established with LUMA dispatch (agree to initial agreed operating procedures set in the Gridco-Genco Operating Agreement)	Y		4/30/2023		Y	Various working sessions have been held with LUMA and a formal RFI has been received from LUMA addressing procedural review. The lines of demarcation have been established on a per plant basis. Additional meetings will be necessary prior to finalizing any of the line items. A formal communication and collaboration plan is in the process of being developed.
33	Jointly, with LUMA, identify the requirements and procedures for the annual performance and heat rate testing for each unit	Y		5/31/2023	100%	Y	
34	Align on dispatch schedule for first 4 weeks and ready to support	Y		6/15/2023		N	
35	Fuel Management						
36	Fuel inventory adequate for dispatch schedule	Y		5/31/2023		N	Inventories to be verified at a later date
37	Fuel delivery schedule adequate to match long-term dispatch projection	Y		5/31/2023		N	Delivery schedule will be verified at a later date
38	Spare Parts						
39	Site team and Genera PR have reviewed current inventory	Y		6/30/2023		N	Revising approach and modified schedules while adding resources to ensure accuracy in the counts and conditions.
40	Inventory is understood and support continued operations	Y		6/30/2023		N	Through review process, Genera has started classifying the spare parts and are working to review and assign parts accordingly.
41	Identify all necessary consumables, spare parts, and capital spares for first 12 months of operations (with communication of this to PREPA and PREB)	Y		5/31/2023	90%	N	Spare parts list was submitted to P3A on June 1, 2023. Comments were received and are being incorporated to resubmit to P3A by June 12, 2023.



42	Relations and Communications						
43	Establish communication with potential site-level union officials	Y		6/30/2023		N	Strategy is under internal review.
44	Finalization						
45	Genera PR and PREPA Functional Area Leaders have agreed handover is ready	Y		6/30/2023		N	This line item will only be available for completion once all other required line items of this checklist are complete