

T&D P3 Project – Request for Clarification ("RFC") Log

October 2020



**Puerto Rico Electric
Power Authority**

Strictly Private and Confidential



T&D P3 Project RFC Log - 10/14/20

#	Topic	Dataroom Reference	Question	Response	Date Answered
1	Integrated Resource Plan	1.5.3	The Integrated Resource Plan includes T&D portions that are redacted due to it being CEII. Are we able to see the redacted T&D information?	Yes. The unredacted versions of the IRP are available in the Independent Engineer and Technical folder in the dataroom, under sub-folder 2018-19 IRP (Index 1.5.3). Also, please note that we have posted additional workpapers in Index 1.5.3.6.	4/12/2019
2	Finance		What is the 2018 deferred balance of the Contributions in Lieu of Taxes (CILT) account that is due to municipalities. Who bears this responsibility after the concession is complete?	The deferred balance of CILT payable to municipalities is offset by receivables from municipalities. The balances are recorded per requirement of the Trust Agreement, and any legacy payables or receivables will not be carried over to the concession except where agreed upon. The primary responsibility of the concessionaire / operator will be calculating and billing the CILT and Subsidy rate riders, and collecting billed sales from customers.	4/12/2019
3	Legal	1.12.2	What is the total employee count for the T&D concession? Please break down current employee count by office and also contract or full time employee.	All non-generation directorate employees would be considered for the T&D concession, approximately 4,500 regular employees. The active employee roster of positions by directorate and office can be found in the Human Resources folder, Staffing sub-folder (Index 1.12.2).	4/12/2019
4	Legal		Does the new cooperative law require the concessionaire to sell distribution systems in order to help locals form cooperatives?	SB1121 (signed into law on April 11th) provides that electric service companies and microgrids (which may include energy cooperatives) shall have the right to demand interconnection to the transmission and / or distribution network under conditions that are non-discriminatory, when it is technically feasible, consistent with the Integrated Resource Plan and the regulations of the Energy Bureau. PREPA or the T&D Concessionaire / Operator will also be required to develop a microgrid interconnection regulation. The T&D Concessionaire / Operator shall evaluate interconnection requests pursuant to the regulation. If the T&D Concessionaire / Operator denies the interconnection of a microgrid or determines that additional technical requirements or improvements to the distribution system are required, the party requesting interconnection may seek the review of the Energy Bureau.	4/12/2019
5	Federal Funding		It is our understanding that the FEMA 428 program requires an estimate to be delivered by October 2018. Can we have access to the preliminary 428 estimate?	The FEMA 428 program currently requires an estimate to be delivered by October 2019. Determining the preliminary estimate is an active and ongoing process in close coordination with FEMA, and the current discussion still focuses on cost-estimate procedures. However, the latest Grid Modernization Plan assess the cumulative cost estimate for Transmission and Distribution to be \$12.21 billion from 2019 through 2028.	4/12/2019
6	Legal		Have the four collective bargaining agreements been translated into English?	The CBA's have not been translated in English.	4/12/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
7	Finance	1.5.4	Are there any more recent annual reports on electric property completed by Consulting Engineers/URS. The most recent available is 2013.	To date, there are no more recent reports on the T&D system. However, an Independent Engineer report is currently in progress. Please find select draft releases of this ongoing report in dataroom folder Index 1.5.4.	4/12/2019
8	Title III		In PREPA's Title III case, do you know if a Restructuring Support Agreement was reached on or before February 12, 2019? If not, has the date been extended, and if so, until when?	On April 9, AAFAF, the Oversight Board, Assured Guaranty and the Ad Hoc Group of PREPA bondholders (the "Moving Parties") announced they have reached an agreement in principal with regards to a Definitive Restructuring Support Agreement ("RSA") to restructure PREPA's existing debt obligations, which provides that certain PREPA debt must remain tax-exempt. Assured Guaranty and the Ad Hoc Group represent holders of approximately 50% of outstanding PREPA bonds. Despite negotiations with National and Syncora (the two other Monoline insurers of PREPA's bonds that collectively hold less than 15% of outstanding PREPA bonds), no agreement has been reached with these parties. The Moving Parties are currently in the final stages of documenting and executing the agreement and are seeking to extend various deadlines until April 26 in order to finalize and execute the Definitive RSA and prepare various motions for the courts approval for the debt restructuring.	4/12/2019
9	Information Technology		Please provide maps overviewing the microwave network used by PREPA	Please find the maps of the microwave network posted to dataroom folder index 1.11.5	4/15/2019
10	Environmental		According to the Environmental Compliance whitepaper, PREPA has 250 transformers that are not in compliance with the Toxic Substances Control Act. How many of these 250 transformers have been replaced?	The statement in the Environmental Compliance Whitepaper regarding the 250 transformers that remain to be disposed of was intended to provide a rough estimate of the number of PCB Contaminated Transformers that PREPA estimated to still be in service at the time of drafting to the best of PREPA's knowledge; however, the number of such transformers that are still in service could be more or less. Note that for the PCB Contaminated Transformers that are still in service, the Toxic Substances Control Act does not require that they be removed from service provided that certain use conditions are met (e.g., the transformers cannot be leaking oil or in bad condition). Thus, these transformers are not necessarily in noncompliance.	4/23/2019
11	Customer Service		What percentage of the customer's bill is fixed?	This varies broadly by tariff and customer class. For general residential, there is a \$4 per month fixed charge, which comprises approximately 20% of basic residential revenue and 5% of total revenue.	5/9/2019

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12	Customer Service		What percentage of revenues come from government entities?	Revenues from government entities that are considered "collectible" or "non-excluded" are approximately 12% of revenues. Municipal consumption called contributions in lieu of taxes ("CILT"), municipal public lighting, and government mandated subsidies (e.g. low income public housing) is not included in this amount.	5/9/2019
13	Customer Service		What percentage of revenues are subsidies?	Municipal contributions in lieu of taxes ("CILT") is estimated to be approximately 2.5% of total revenues, public lighting approximately 3% of total revenues, and subsidies for low income and other special customers is approximately 3.5% of total revenues, for a total of approximately 9% of total.	5/9/2019
14	Generation		Please provide generation dispatch information	For additional information on generation dispatch please refer to the Fuel and Purchase Power summary file in the data room at Index (1.3.6.7).	5/9/2019
15	Human Resources & Labor		What happens to PREPA employees that go to government and are licensed without pay - would the private partner be obligated to retain them? How many of such employees are there right now?	<p>There are twenty-three (23) cases, detailed below, of PREPA employees that are licensed without pay, and assigned to other government agencies / public corporations. These employees normally return to PREPA once their appointment to these governmental agencies ends. As the below data suggests, there are only 10 employees that are directly related to T&D functions (T&D and Customer Service). All PREPA employees are engaged either in operations or as a support to operations.</p> <p>License without Pay</p> <ul style="list-style-type: none"> - Customer Service – 6 employees - Generation – 7 employees - Finance – 2 employees - Transmission and Distribution – 4 employees - Legal Affairs – 1 employee - Executive – 1 - Human Resources – 1 - Planning – 1 	5/9/2019
16	Human Resources & Labor		Do unions comply with NLRB?	The unions are certified by state law and comply with the Puerto Rico Labor Relations Board. With regards to PREPA, they are not certified by the NLRB.	5/9/2019
17	Human Resources & Labor		What is a typical lineman's marginal tax bracket? What is their take-home pay?	Puerto Rico income tax brackets can be found in the PWC summary in folder 1.12 Human Resources. Average PREPA employee take home pay (salary) is approximately \$40k per year. Average tax rate on \$40k is approximately 8%, and marginal tax rate above \$41.5k is 25%, and 33% above \$61.5k.	5/9/2019

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18	Legal		How many arbitration / grievances are there on an annual basis? What is the nature of these cases?	<p>Arbitration Department (Natural Years):</p> <ul style="list-style-type: none"> - 714 claims in 2016 - 453 claims in 2017 - 526 claims in 2018 <p>Nature: Risk Bonus, Christmas Bonus, Job Postings, Traveling Time, Overtime, Reemployment, Health Care Plan</p> <p>Special Procedures Subdivision (Natural Years):</p> <p>Cases before the Puerto Rico Labor Relations Board:</p> <ul style="list-style-type: none"> - 20 cases in 2014 - 176 cases in 2015 - 1000 cases in 2016 - 165 cases in 2017 - 271 cases in 2018 - 385 cases in 2019 <p>Cases before the Conciliation and Arbitration Bureau:</p> <ul style="list-style-type: none"> - 321 Subcontracts – 11 Extraordinary Improvements in 2015 - 118 Subcontracts – 5 Extraordinary Improvements in 2016 - 591 Subcontracts – 2 Extraordinary Improvements in 2017 - 204 Subcontracts in 2018 - 40 Subcontracts in 2019 <p>*Subcontracts:</p> <ul style="list-style-type: none"> - Unions' claims under Article IV of the respective Collective Bargaining Agreements. This Article forbids PREPA from subcontracting any company to perform duties belonging to the unions except under specific circumstances delineated in each of the Collective Bargaining Agreements. <p>**Extraordinary improvements to property:</p>	5/9/2019
19	Regulatory		Would document retention policy change if run by private operator? And broadly which rules that currently apply to PREPA as a government entity, would continue to apply to the private partner?	<p>The Operator will only have such obligations with respect to document storage as are established under the O&M Agreement.</p>	5/9/2019
20	Regulatory		How does Act 120 impact employee retention?	Act 120 does not require that Operator employ any PREPA employees. The O&M Agreement will require that the Operator interview PREPA employees. The requirements of Act 120 will only apply to PREPA employees that the Operator decides to hire.	5/9/2019
21	Title III		How do CBAs fit into the Title III discussion?	This is still subject to discussion and analysis. We are open to receiving suggestions.	5/9/2019

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22	Financial Model		Please provide status of process to file Form 428/PW documents. Include the elements on the forms which are being calculated and how PREPA is creating these estimates (e.g. how are escalation, risk factors and other parameters developed, what schedule assumptions are built into estimates). Please provide any draft forms that PREPA has completed if that is available.	The FEMA 428 program currently requires an estimate to be delivered by PREPA by October 2019. Determining the preliminary estimate is an active and ongoing process in close coordination with FEMA, and the current discussion focuses on cost-estimate procedures. PREPA, under the MOU with COR3, has secured additional resources from Navigant and other professionals that are helping to develop these estimates. Documentation to be submitted includes, but is not limited to: Scope of work, DDD, detailed cost estimate and architectural estimates. PREPA is generally approaching the process to prepare cost estimates on a district by district basis. The initial district for which a cost estimate is being prepared is Humacao. The cost estimate for the Humacao district is currently in progress. Draft forms will be provided available after completion.	5/9/2019
23	Generation		Why is production at the hydro facilities so low? Is it because of the actual generation units, or is it a problem with silt build-up in the reservoirs? What is the recorded generation they have operated at for the past 5-10 years?	ae_ meta file (folder 1.2.2.4) has historic hydro generation. Our general understanding is that the issue with hydro generation is related to silt build-up, and restoration would require significant dredging at high cost.	5/9/2019
24	Integrated Resource Plan		Please provide analysis and any internal studies used to estimate potential of rooftop and utility-scale solar generation (other than the IRP). This could include PREPA's existing load profile (8760 hour data if possible), assessment of installed rooftop capacity and future adoption rates by customer segment, any data on existing housing stock and available roof area inside Puerto Rico.	The IRP has adopted PREPA internal studies as the baseline estimate for existing and potential DG expansion. These forecasts are available in the IRP workpaper folder 1.5.3.6.7 titled CONFIDENTIAL-DG_Totals Forecast_V10	5/9/2019
25	Legal		What will happen with the existing pension liability? Does that stay with PREPA?	The PREPA Fiscal Plan contemplates keeping the existing pension liability at the successor entity and implementation of a transition charge as a dedicated funding source to resolve underfunding and fund the pension on a go-forward basis.	5/9/2019
26	Planning / Contracts		Please identify all self-generation that is known to exist. If available, break this out by class of customer (R,C, and I) or to any detail available (e.g. by technology, PURPA unit or not, Cogen, solar, storage)	The PREPA Planning IRP and Siemens team has prepared an estimate of this in the file called "DG Allocation by Customer Class_v1" available in the IRP workpaper folder 1.5.3.6.7	5/9/2019

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27	Regulatory		Please provide any studies or analysis performed that provide an overview of the ROW acquisition process. This might include selected case studies from prior projects, process maps or flow charts describing existing process. What we are trying to do is develop a perspective on potential for land acquisitions to slow the transformation process.	The process for the acquisition by PREPA of properties and rights of way is established by PREPA regulation. The applicable regulations are Regulation No. 6955 of 2004, Regulation No. 7282 of 2005 and Regulation No. 7302 of 2006 (Data Room Index #1.4.7). We do not expect land acquisitions to delay the transaction or the transformation process. After the closing, we expect PREPA to retain responsibility in either proving, managing or acquiring rights of way or other real property rights, as necessary, with respect to the system. Furthermore, we have diligence PREPA's real property rights with respect to certain of the transmission lines and it appears that PREPA has documentation evidencing its title or other rights with respect to such lines. We have not been able to diligence any of the distribution lines because such documents have not been available for review.	5/9/2019
28	Regulatory		With respect to document storage, there were 35mm docs – does Act 5 define how PREPA must maintain documents?	Act 5 applies to PREPA, but the Operator will only have such obligations with respect to document storage as are established under the O&M Agreement.	5/9/2019
29	Regulatory		Will the agreed-upon partnership contract take precedent over existing legislation and regulations after being reviewed and approved up to an including the Governor? This was stated to us in the regulatory workshop in San Juan on April 9th. On the past P3 projects (toll roads, airport), have there been any regulatory issues related to interpreting regulatory commitments or legislation that were resolved?	<p>Pursuant to Section 6 of Act No. 120-2018, as amended, the Partnership Contract may provide exemptions or alternate procedures with respect to the following statutory provisions (and any related regulatory provision or related action), subject to approval by PREB through the issuance of the Energy Compliance Certificate:</p> <ol style="list-style-type: none"> 1. any requirement of Act No. 109 of June 28, 1962, as amended, known as the Puerto Rico Public Service Act; 2. any requirement of the Integrated Resources Plan, as defined in Act No. 57-2014, as amended; and 3. any statutory provision applicable to PREPA, including, among others, those imposed by PREPA's enabling act. <p>Therefore, in such cases, the Partnership Contract may take precedent over such statutory provisions. However, it may not take precedent over any other statutory provisions.</p> <p>In the prior P3 projects, there have not been regulatory issues related to interpreting regulatory commitments or legislation</p>	5/9/2019

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30	Human Resources & Labor		Please provide a translated English version of the employee spreadsheet currently in the data room (FS-665 Active Employee Positions as of 17-Dec-2018.xls)	An English version of the referenced employee spreadsheet is not available. Please note that an updated version of the referenced file (now as of 5/2/19) has been uploaded to the data room at Index 1.12.2.3.	5/9/2019
31	Information Technology		Please provide a copy of the last cybersecurity audit report with the full audit findings.	Due to security concerns, PREPA will provide the cybersecurity reports as part of the transition process.	5/9/2019
32	Information Technology		Who is the 3rd party managed security contract provider (referenced on p. 128 of CIM)? Can we get a copy of contract?	PREPA contracted GM Security Technologies professional services with the PREPA Network and PREPA Master Service Agreement. The managed security service contract is still in the processes of being signed.	5/9/2019
33	Customer Service		Please provide the number of customers, revenue and energy sales for each tariff class. If the count of customers in each tariff changed between the "Electric Service Rates" document in the data room and the proposed new rate classes, please provide the customer count for each set of existing and proposed rates.	In folder 1.4.3.4 see Exhibit C for the current tariff book containing new PREB approved rates implemented by PREPA on May 1, 2019, and Exhibit D for tariff level detail on revenues and billing determinants from the 2016 rate case. Updated data will be provided if available.	5/21/2019
34	Customer Service		How much of total generation output is lost to theft? Please provide any overview or relevant data on non-technical loss trends for past 3-5 years if available plus any analysis on where the theft is occurring from (e.g. which customer segments, most common methods of theft).	According to analysis performed by PREPA Planning, in FY 2017 there were approximately 12% losses from Net Generation (after auxiliary power). Approximately 8% is attributed to technical losses (line and substation losses) and 4% attributable to non-technical losses, which includes theft and measurement or metering error. It is unclear what amount of non-technical losses is directly attributable to theft vs. metering error.	5/21/2019
35	Human Resources & Labor		Please provide data for employees by age for each directorate. What is going to happen over the next 10 years from a labor perspective?	Many key employees are nearing retirement eligibility, and will need to be replaced with new trained personnel. Headcount has declined nearly 40% from a decade ago, due to a combination of financial constraints, demographic trends, and competition. The fiscal plan envisions no further decline in headcount, and some level of new hiring to staff understaffed areas. The new system operator may propose increasing or decreasing staffing levels above the fiscal plan projection to meet financial or operational reliability targets.	5/21/2019
36	Regulatory		Please describe existing and proposed framework of how storage projects will be executed. How will output of storage be priced? Which ancillary service products will have a dollar value itemized? Will customers with storage be eligible for a new tariff? Has that tariff been designed and approved yet? Is there any storage planned as part of the T&D system?	The least complicated conceivable route at present is to structure battery storage PPA's as fixed / ancillary service payments that would be included in the Purchased Power Adjustment Clause as a pass-through expense. Battery storage is a major component of the proposed IRP.	5/21/2019
37	Finance		Please provide a translated English version of a General Ledger spreadsheet currently in the data room (PREPA_GL_FY2018.xls)	A translated English version of the General Ledger is not available at this time.	5/21/2019

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38	Generation		<p>Please clarify how the New Fortress Energy project in San Juan will relate to PREPA? Who is the counterparty on the LNG supply?</p> <p>What is the plan for conversion of existing units to burn natural gas?</p> <p>What is the plan for the addition of new generation capacity (who are the counterparties, what is the technical configuration, what is the timeline)?</p>	<p>PREPA is contracting directly with NFE as an offtaker of LNG for the San Juan 5 & 6 combined cycle power plant. San Juan 5 & 6 are scheduled to be converted to burn natural gas between September 2019 and June 2020, the timing of which is largely dependent on environmental permitting. Additional gas-fired generation in the metro area, either at San Juan or Palo Seco, is included in the IRP and will use the NFE import facility in the San Juan harbor.</p>	5/21/2019
39	Planning / Contracts		<p>Please provide a complete list of contractors that currently provide services to PREPA as well as the value of the annual of their contracts as well as the nature of the work covered or performed under the contract.</p>	<p>File no. 1.8 in the data room includes the relevant commercial contracts entered into by PREPA. For ease of reference we further include a key vendors' list that was prepared by PREPA for due diligence efforts in January 2019 (index 1.2.6). For additional reference and informational purposes only, we performed a query in the Puerto Rico Comptroller's website for all contracts entered into by PREPA during the current fiscal year, and included it in the dataroom in file 1.8.7. Please note that PREPA is required under law to register every contract but we cannot guarantee that the query is accurate.</p>	5/21/2019
40	Financial Model		<p>Is there a cash forecast available covering the period 2019-2028 showing a detailed sources and uses of funds for each year?</p>	<p>The Financial Model released to Proponents is the most recent long-term forecast through 2028. As part of its PROMESA requirements, PREPA is developing an updated fiscal plan and short term cash flow projections based on the FY 2020 annual budget. These will be made available to proponents when finalized.</p>	5/21/2019
41	Title III		<p>Provide an update on the bankruptcy/debt restructuring.</p>	<p>Please see folder 10.1.3 for the PREPA RSA published May 3, 2019.</p>	5/21/2019
42	Finance		<p>What access does PREPA have to short term funding sources to meet working capital requirements? (DIP financing, other credit facilities)</p>	<p>Since the beginning of forbearance, PREPA has had to use various financing avenues to meet short term working capital needs. In general, PREPA relies on cash working capital, and has a stated requirement of one-sixth of budget operating expenses provided for in the Trust Agreement (governing document of legacy bonded debt). Since filing for Title 3 bankruptcy protection in July 2017, PREPA obtained access to short term working capital through a revolving loan from the Government of Puerto Rico.</p>	5/21/2019

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43	Generation		<p>1. What is the status of your generation divestiture process:</p> <p>a. Current status / expected completion date</p> <p>b. Are you still expecting to divest all currently owned generation</p> <p>c. Who will be responsible for fuel supply with these divested assets</p> <p>d. What is the term of the contracts you may be contemplating for power for these assets</p> <p>e. Do you have a contemplated list of bidders and potential asset valuations</p>	<p>a. The RFP for generation divestiture is currently being drafted and will allow for either the purchased or operation of the generation facilities, in a similar arrangement to the T&D agreement.</p> <p>B. yes, divest ownership or operating responsibility</p> <p>c. possibly the T&D system operator or successor entity, to-be-determined</p> <p>d. TBD</p> <p>e. not yet, TBD</p>	5/21/2019
44	Generation		<p>What is the current status of renegotiating the two large PPOA's (AES and EcoElectrica) as well as the fifteen solar and WTE contracts.</p>	<p>One of the two large PPOA renegotiations is in advanced stages. The other PPOA's are still in negotiation and must be accepted, rejected or renegotiated before the Plan of Adjustment is finalized and submitted to the Title 3 Court</p>	5/21/2019
45	Generation		<p>What is the current status of the natural gas conversion projects for San Juan as well as the incremental land / sea based LNG projects? Do you see these fuel supply responsibilities shifting to the new owners of the to-be divested assets?</p>	<p>PREPA is contracting with New Fortress Energy for LNG at the San Juan 5 & 6 combined cycle power plant. San Juan 5 & 6 are scheduled to be converted and back online burning natural gas between September 2019 and June 2020, the timing of which is largely dependent on environmental permitting. Additional gas-fired generation in the metro area, either at San Juan or Palo Seco, is included in the IRP and could use the NFE import facility in the San Juan harbor. Sea based LNG and other import projects around the island are subject to the findings of the IRP.</p>	5/21/2019
46	Generation		<p>Do you have an estimate of the current level of self-supply / customer owned generation in Puerto Rico?</p>	<p>The PREPA Planning IRP and Siemens team has prepared an estimate of this in the file called "DG Allocation by Customer Class_v1" available in the IRP workpaper folder 1.5.3.6.7</p>	5/21/2019
47	Human Resources & Labor		<p>The workforce (e.g., allocations to T&D, definition and role of "trust" positions, use of contractors, staffing shortfall, outside consultant assessment)</p>	<p>Please see the Confidential Information Memorandum in the dataroom, the Management Presentation from April, and folder 1.12 of the dataroom for an overview of PREPA's workforce</p>	5/21/2019
48	Human Resources & Labor		<p>Collective bargaining agreements, arbitration awards, bargaining history, bargaining obligations, and union activity</p>	<p>Please see folder 1.12.3 of the dataroom for PREPA's CBAs.</p>	5/21/2019
49	Generation		<p>What organization does the dispatch function currently reside in?</p>	<p>The energy control center was previously housed in the Generation directorate, but was separated as its own division at the beginning of FY19. The T&D service provider is intended to be responsible for system dispatch operations.</p>	5/21/2019
50	Human Resources & Labor		<p>Do you foresee any issue transferring employee records post transaction?</p>	<p>No issues are expected.</p>	5/21/2019

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51	Federal Funding		<p>FEMA funding request: Provide full FEMA request and the list of projects and associated cost estimates Follow-up discussions on specific timeline (i.e., October complete and final approval)</p>	<p>Please find uploaded to the data room at index #1.1.2.3.3 an internal project management document, which contains the "priority section 428 (permanent work) projects". This list is broken down into Tier 1 and Tier 2 projects. Work associated with the Tier 1 projects is underway, but only the DFMO #001 Vieques & Culebra and #005 Humacao District have been officially submitted to FEMA.</p> <p>DFMO #001 has undergone significant revision and modification, and a cost estimate for this project is not available. DFMO #005 has a cost estimate of approximately \$0.3 billion (only repair damage) and \$1.3 billion (repair and upgrade damage to new codes and standards).</p> <p>In general, FEMA, COR3 and PREPA are engaged in a collaborative process and meetings, discussions and follow-up occurs daily. However, there is no specific timeline.</p>	5/21/2019
52	Title III		<p>Bankruptcy update – PREPA agreed on a call in the next month or so as they expect meaningful positive development on approving the settlement</p>	<p>Please see folder 10.1.3 for the PREPA RSA published May 3, 2019.</p>	5/21/2019
53	Financial Model		<p>Rates – provide a forecast from current rates over the next ten years and the underlying assumptions (i.e., increases due to the Restructuring Support Agreements reached with bondholders, increases to address the underfunded budget, increases for mgmt. fee, increases for veg mgmt. and other operating costs, changes for new generation to replace existing generation (up for capacity cost, down for lower fuel and more efficient units), and changes due to higher or lower volume to customers, etc.)</p>	<p>Please see the Financial Model released to Proponents. Note that this model does not incorporate any compensation to T&D Operator; Proponent will have to add that information in the relevant field. Proponent should take their own views on operating costs, generation costs, vegetation management, etc.</p>	5/21/2019
54	Federal Funding		<p>Confirm whether the October 2019 deadline is for the submission of funding requests or the date that FEMA will confirm the funding awards.</p>	<p>The October deadline is for the submission of section 428 (permanent work) projects to FEMA with cost estimates, not the date that FEMA will confirm awards. FEMA has advised PREPA, in writing, that the deadline may be extended on a case by case basis at FEMA's discretion.</p>	5/21/2019
55	Customer Service		<p>What percentage of payments are received via mail?</p>	<p>According to analysis prepared by PREPA, mail/check transactions received by PREPA between January 2019 and March 2019 represent 1.07% of the total number of transactions and 4.42% of the total amounts received.</p>	5/21/2019
56	Federal Funding		<p>Please post the August 8, 2018 Economic Disaster and Recovery Plan to the data room</p>	<p>Economic disaster and recovery plan has been uploaded to the data room at index # 1.1.2.3.1</p>	5/21/2019

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57	Federal Funding		Please provide the CDBG Action Plan - September 2018	Approved CDBG action plan has been uploaded to the data room at index # 1.1.2.3.2	5/21/2019
58	Federal Funding		Has FEMA been receptive to the funding of smart meters? Are they supportive of the ability to use such meters for remote shutoff?	Smart Meters have been included in the Humacao District project formulation that has been submitted to FEMA. No feedback has been provided by FEMA at this time.	5/21/2019
59	Human Resources & Labor		Is employment in Puerto Rico "at will"?	Employment in Puerto Rico is NOT "at will" due to the provisions of Act No. 80 of May 30, 1976, as amended ("Act 80"). As a result, although an employer can dismiss an employee without just cause, Act 80 would require the employer to pay certain amounts to such employee. The payment due to an employee dismissed without just cause is based on a formula included in Act 80 and varies based on the amount of time the employee worked for the employer.	5/21/2019
60	Human Resources & Labor		Can the four existing unions represent private sector employees?	The four PREPA unions are not legally prohibited from representing private sector employees. Notwithstanding the foregoing, to the extent a PREPA union represents private sector employees, it would have to comply with certain federal law requirements, such as the provisions of the Landum Griffin Act.	5/21/2019
61	Customer Service		Please provide number of meters by metering type and by vendor. How many are electromechanical, electronic and smart meters? How many are capable of meter J49diagnostics, interval, TOU and remote disconnects. How many are bi-directional and net metering?	<p>Details on (1) number of meters by type and (2) number by interval, TOU and remote disconnect capability are included in the data room at #1.3.7.10. Details by vendor are not available at this time.</p> <p>Bi-directional Meters</p> <ul style="list-style-type: none"> - 1,475,535 meaning they receive and send data - 623,835 meaning they have forward and reverse energy registers that can be read at once <p>Net Metering</p> <ul style="list-style-type: none"> - 623,835 are capable - approximately 6,500 by an CCB Report created by IT personnel I July 2017 - TWACS quantity it's not accurate because we are waiting IT updates in the TNS Data Base with CCB <p>Please clarify what is meant by J49 diagnostics.</p>	5/24/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
62	Customer Service		Please describe the process of meter testing and meter asset management in your Meter Shop. What systems are used for meter life-cycle management, inventory, testing and quality assurance? What type of meter for wholesale measurement?	<p>i. - A sample of the new meters is determine to be tested by type and ANSI standards. After the testing findings are reported to the procurement dept</p> <ul style="list-style-type: none"> - Verify the sample for visual damages - Install the meter in the tester machine and do tests - AMR tested (read the meter by TWACS system if applicable) - Disconnect mechanism tested (if applicable) <p>ii. Meter life-cycle management: PREPA's economic condition and hurricane Maria doesn't allowed PREPA to replace meters to do meter life-cycle management. We received small quantities of meter to use with the districts operations. This question should be answered by Customer Service Regions (AOC). For inventory, PREPA uses the procurement division for inventory. Districts requests meter from the central warehouse and place them at their local inventory. The same with Metering offices</p> <p>iii. Types of meters for wholesale measurement are: 3S, 5s, 9s and 16s polyphase meters with auxiliary metering equipment's</p>	5/24/2019
63	Customer Service		Please decribe the process for installation and field testing of metering equipment.	This process it's done by Metering Testers I and II joined by a Metering Testers Specialist or lineman I, always in teams. They complete a visual inspection and then do a procedure to verify the metering efficiency ("cotejo"), billing constant "k", CTs and PTs. This procedure is verified by the Engineer and notified to wholesale department.	5/24/2019
64	Customer Service		What is the pilot AMI's communication infrastructure? Is it mesh RF or PLC?	This is non existent at the moment but there are plans to issue a pilot. RFP has been drafted and is currently under review.	5/24/2019
65	Customer Service		How many meters are actively used for remote disconnect and revenue protection?	In total the number of meters that can be disconnected remotely are approximately: Echelon: 18,221 AMR: 313,320	5/24/2019
66	Planning / Contracts		Please send a copy of the recently issued Vegetation Management RFP.	Please clarify what is meant by revenue protection. For a copy of the vegetation management RFP please refer to folder #1.6.29 in the data room.	5/24/2019
67	Customer Service		What is the credit and collections process (30, 60, 90 days)?	Detailed procedures for processing overdue bills have been uploaded to the data room at #1.3.7.8.	5/24/2019
				Generally, PREPA begins the internal process of shutting off service when bills are 55-60 days overdue and officially cuts off service after day 60.	

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#	Topic	Dataroom Reference	Question	Response	Date Answered
68	Customer Service		Does the call center respond to email inquiries?	Yes, the call center responds to email inquiries.	5/24/2019
69	Customer Service		Can customers be set up on pre-authorized credit card payment?	Not currently. However, customers can set up payments from preauthorized bank/debit accounts.	5/24/2019
70	Customer Service		When do the district offices log into the call center phone queues to begin taking calls? How is this accounted for in forecasting? How many calls do the district offices take?	Currently, district offices do not accept any calls and are only used for in-person visits and other administrative work.	5/24/2019
71	Customer Service		What social funding is available for low income customers that cannot afford their bill payments?	Social funding is not available to customers however, PREPA does receive subsidies that are applied to preselected customers bills once they provide the necessary documentation.	5/24/2019
72	Customer Service		Is the Customer Services Directorate report for July and December 2018 available? Are there any reports available for 2019?	Please clarify which Customer Services Directorate report this is in reference to. KPI reports for January - April 2019 have been uploaded to the data room at folder 1.3.7.12.	5/24/2019
73	Customer Service		Is there available data from the call center to show average call volumes by interval throughout the day?	Details on call volume in half hour increments during the first week of April 2019 has been uploaded to the data room at #1.3.7.11.	5/24/2019
74	Customer Service		How many seats are available in the call center?	Approximately 70 are available in the call center. Approximately 100 additional seats will be added pursuant to a currently ongoing RFP process.	5/24/2019
75	Customer Service		Is there an outbound call process for collections?	Not currently. An outbound call process would be put in place once the new call center is finalized.	5/24/2019
76	Customer Service		Who closes the service tickets completed by the field ops workers?	Customer Service related service tickets are closed by Customer Service Representatives. For emergency and outage related tickets, customer service may generate service tickets for the T&D directorate. Those tickets would be closed by T&D representatives.	5/24/2019
77	Customer Service		What shifts do the call center run?	The call center operates and is staffed 24/7. For a detailed current shift schedule please refer to data room index #1.3.7.6. District Offices, Theft Division and Metering Division Offices are typically open Monday thru Friday (7:30am - 5pm). First shift runs 7:30am - 4:00pm and second shift runs 8:00am - 5:00pm. Several district offices have extended hours and run a third shift from 10:00am - 6:30pm.	5/24/2019
78	Customer Service		What shifts are run in the district offices? For what positions? How many people per shift?	District Offices, Theft Division and Metering Division Offices are typically open Monday thru Friday (7:30am - 5pm). First shift runs 7:30am - 4:00pm and second shift runs 8:00am - 5:00pm. Several district offices have extended hours and run a third shift from 10:00am - 6:30pm.	5/24/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
79	Customer Service		Are call center agents bilingual (Spanish/English)?	Yes, call center agents are required to take and pass an oral language exam to ensure they have bilingual capabilities.	5/24/2019
80	Customer Service		How is mertering data entered into the billing system? What causes the discrepancy between meter read completion (97%) and monthly billing completion (sometimes as low as 37%)	AMR and manual reads were used and entered after the hurricane. Occasionally there is a disconnect between the AMR system and CC&B often caused by substation outages and communication breaks. These differences would be reconciled in the next month. Please clarify what the 97% and 37% figures are in reference to.	5/24/2019
81	Customer Service		Are there any customer service staff assigned to back office billing functions like bill QA, hi/lo meter reads, other To Dos?	Yes, customer service staff rotate between customer facing "front office" positions and back office functions.	5/24/2019
82	Customer Service		Other than receiving an electronic bill, are there any other functions that customers can perform online?	A variety of functions are available to customers on the PREPA website. A recently distributed email to customers (included in the data room at #1.3.7.7) provides the following examples: <ul style="list-style-type: none"> - Access previous invoices - Make payments - Report areas without service throughout the Island - View consumption history - Request Certificates of Debt or Balance and Active Service - Service Transfers - Service Disconnection - Report Energy Theft 	5/24/2019
83	Customer Service		Does the call center have a training facility? How are customer service reps trained? Is there a training environment for Oracle CC&B? How long is customer service training? Do customer service reps receive ongoing training?	The center commercial operations training center ("CAOC") is now housed under the human resources directorate. This facility has areas specifically for customer service related training. A 6 month training course is provided at the onset of each employee's tenure within the customer service directorate. Ongoing training is provided periodically.	5/24/2019
84	Customer Service		Are call center scripts available for review?	Yes, a copy of the call center script has been uploaded to the data room at #1.3.7.9.	5/24/2019
85	Customer Service		What is the average call center labour shrinkage used for schedule forecasting?	PREPA does not change schedules depending on forecast calls.	5/24/2019
86	Customer Service	1.3.7.4	How many call is the call center receiving monthly? (an August status report showed 170K, is that a normal month?)	The 170K figure reflected in the August status report is a typo and is overstated. For updated data on monthly call figures please refer to the KPIs uploaded to the data room in folder 1.3.7.12.	5/24/2019
87	Customer Service	1.3.7.4	How many customer offices do they have? Why are some closed?	PREPA currently has 21 district commercial offices and 6 local offices which are operational. 7 of the customer service offices did not reopen after sustaining damage during Hurricane Maria.	5/24/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
88	Customer Service	1.12.15	Is there employee training around customer satisfaction?	Customer service employees receive a 6 month training course at the onset of their tenure within the Customer Service directorate. There is not additional employee training related to customer satisfaction at this time.	5/24/2019
89	Customer Service		How are they currently marketing their products and services? i. Messaging around reliability, safety, customer service ii. Messaging around products (paperless billing, budget billing, customer portal, etc.) iii. What channels are they using to get their messages out? (TV? Radio? E-mail? Bill inserts? etc.)	Currently PREPA markets products and services through the use of TV interviews (unpaid), social media, and inserts included with Customer's bills.	5/24/2019
90	Safety		What specific actions have been taken to improve workplace safety since the Dupont study? Any outstanding recommendations?	PREPA has implemented all safety recommendations per the Dupont report including the establishment of an operational risk management system, near miss-tracking, monthly incident detailed reporting, union-leadership engagement, incident investigation and training. PREPA has yet to implement the disciplinary protocol recommendation for safety related incidents as recommended by the Dupont study.	5/24/2019
91	Safety		Provide by job classification the Total Recordable Incident Rate for 2017	Please refer to the 2017 Total Recordable Incident index, found in the data room as 1.12.4.10. Please note that due to the hurricane, these statistics are not representative of a typical year.	5/24/2019
92	Customer Service		What IT funding has been provided to support Modernizing of Call Center? There will need to be funds for IVR overhaul, new agent desktop, real time recording of calls, QA capabilities, chat, call back functionality, new paper bill, new customer portal, theft detection analytics software. robust reporting package. etc.	None currently. IVR is subcontracted with oriental bank. The call center RFP which is in process will modernize the call center facilities.	5/24/2019
93	Customer Service		What O&M funding has been provided for employee training and development?	No O&M funding has been budgeted for any additional training or development.	5/24/2019
94	Federal Funding		Please upload one sample FEMA filing to data room	The Humacao District project formulation documentation has been uploaded to the data room at folder #1.4.11. This is the draft plan for 428 work in the Humacao District. Please let us know if there is a different type of filing you are looking for.	5/24/2019
95	Transmission		Provide a Ten year history of Transmission and Distribution CAIDI prior to Hurricane Maria.	Data is not reliable prior to FY2013. Please note that the T&D condition assessment prepared by S&L has relevant data in the appendix.	5/24/2019
96	Safety		Please provide the safety metrics by directorate / operational category. In particular, please provide a detailed breakdown for the T&D directorate	Please refer to safety metric dataset for the month of April, which provides directorate and job classification for incidents, as per event recording recommendations in the Dupont study. This can be found in the data room as 1.12.4.9	5/24/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
97	Safety		What are the "other" OSHA recordable events? Why are there so many of them / why haven't they been classified into one of the other incident categories?	PREPA classifies OSHA recordable events per OSHA classification standards as either injuries, skin disorders, respiratory conditions, poisoning, hearing loss, or other. Recordable events that do not fall within the definition of the first five categories are categorized by default as "other".	5/24/2019
98	Transmission		Does PREPA have any joint pole agreements with other entities such as telephone? and if so, get a copy of any such agreements.	Yes, please refer to folder #1.1.2.3.4 in the data room. Please note that PREPA expects that new agreements will be executed based on a revised form that it is still in the process of preparing. Any such new agreements will be made available to the proponents through the data room.	5/29/2019
99	Human Resources & Labor		We understand that your HRIS system of record is Oracle. What other systems do you use for talent management, recruitment, and other HR functions?	Currently the only two systems used by the Human Resources Directorate are Oracle and Kronos.	5/29/2019
100	Transmission		What are the standard conductors deployed on the system? Are they common for all voltage classes considered transmission?	The below list is not exhaustive but includes general details on standard conductors: In 115kv lines: 3/0 AWG, 556 ACSR, 556 SAAC, 795 ACSR, 795 SAAC, 1192 ACSR, 2000 KCMIL(for underground) In 230kv lines: 1192 ACSR Additionally, please note that there are some lines that have dual conductors per phase.	5/29/2019
101	Transmission		Is LIDAR included in the inspection process? If so when was the last LidAR survey?	PREPA does not have a LIDAR inspection process at this time.	5/29/2019
102	Transmission		Is the workforce trained in live line capabilities? If so up to what voltage? Are they bare hand qualified?	Lineman are certified to work on live lines up to 13kV. Lineman that are bare hand qualified work on live lines from 38kV up to 230kV.	5/29/2019
103	Transmission		SAIDI – provide list of outages that comprise SAIDI #s for the past three years. Also provide list of outages that are excluded from SAIDI for each of those years.	For details on SAIDA figures for 2016 - 2019 please refer to folder #1.3.2.8 in the data room.	5/29/2019
104	Transmission		Storm – provide emergency response manual / storm process	Please refer to the emergency operations manual which has been uploaded to the data room at folder #1.3.2.7.	5/29/2019
105	Transmission		Provide the transmission and Distribution System One Line Diagrams along with the Transmission and Distribution station One Line Diagrams as well.	These documents have been uploaded to the data room at #1.3.2.5 and 1.3.2.6.	5/29/2019
106	Transmission		Provide Land routes of the 230kv and the 115kv lines	For maps that include details on the 230kv and 115kv line routes please refer to #1.3.1.5 and #1.3.1.9 in the data room. Please let us know if you are looking for a more detailed listing.	5/29/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
107	Environmental		Transmission Easements vs. fee owned? Easement restrictions with landowners?	In most cases, PREPA has easements over the real property where the T&D lines are located, rather than being the fee simple owner of the properties. The restrictions applicable to the areas subject to PREPA's easement are established in PREPA's Easement Regulation, Regulation No. 7282 of January 25, 2007. Such regulation is currently only available in Spanish, but we are preparing an unofficial translation of the regulation to upload to the data room.	5/29/2019
108	Legal		How restrictive transmissions easements are? It is unclear. (Note: PREPA representatives requested that we submit questions via the data room.)	The restrictions applicable to the areas subject to PREPA's easement are established in PREPA's Easement Regulation, Regulation No. 7282 of January 25, 2007.	5/29/2019
109	Transmission		Provide a copy of the Emergency/Storm Disaster Manual.	Please refer to the emergency operations manual which has been uploaded to the data room at folder #1.3.2.7.	5/29/2019
110	Transmission		Describe the process and documentation that is current being utilized in System Operations to dispatch generation.	PREPA does not have SOP's for generation dispatch. Load flow studies using Siemens Spectrum System are made for high risk outages or line clearances. Monthly/quarterly generation forecasts are made with local applications and are shared with Planning and Fuel Office areas for their respective operations.	5/29/2019
111	Environmental		Provide the easements and/or fee owned property records for the transmission ROW's crossing private land.	All easement records that have been digitized have been uploaded to the data room under the folder titled "Real Property Documents." Such records cover most of the properties for the 230kV lines and a significant portion of the properties for the 115kV lines. Additional documents will be uploaded to the data room as PREPA continues to digitize its real property records. In some instances, PREPA's easements may not be recorded in the Registry of the Property, but PREPA has sufficient evidence to prove that it has acquired an easement through adverse possession for 20 years pursuant to Act No. 143 of July 20, 1979.	5/29/2019
112	Legal		Please provide detail on restrictions on towers in terms of access, or total cost of rent for land agreements for access to the T&D system	Towers are located in land over which PREPA has easements. Refer to the regulation referenced below for the restrictions applicable to such easements. The restrictions applicable to the areas subject to PREPA's easement are established in PREPA's Easement Regulation, Regulation No. 7282 of January 25, 2007.	5/29/2019
113	Transmission		How many transmission lines share same poles / same right of ways?	An old report notes there are approximately 85.6 miles of lines with shared poles.	5/29/2019
114	Transmission		What percent of transmission centers / substations have SCADA?	PREPA has approximately 99.4% of transmission centers and 98.8% of distribution substations with SCAD RTU.	5/29/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
115	Transmission		Is there a standard conductor used across the entire 230 kV system?	All PREPA 230 kV lines use 1192.5 kcmil ACSR, except lines from Costa Sur S.P. to EcoEléctrica P.P., which uses 795.0 kcmil ACSR.	5/29/2019
116	Transmission		Please provide additional detail on easements	Please provide additional detail as to the information being sought. For example, are you interested in the rights that easements provide under Puerto Rico law or how are they created and recorded?	5/29/2019
117	Environmental		How many notices of environmental violations have you received?	<p>We received 5 NOV's within the last year. PREPA received 3 NOV's related to USTs within the last year or so, at the Utuado, Humacao and, Arecibo workshops. See above response.</p> <p>PREPA received a fourth NOV related to the Control of Erosion and Prevention of Sedimentation ("CES") Program at Bairoa Substation on May 9, 2019. See Folder 1.6.23. PREPA responded on May 15, 2019 and is waiting for PREQB's response.</p> <p>A fifth NOV was issued by PREQB on December 4, 2018, alleging that PREPA's underground injection control ("UIC") permit for the Monte del Estado facility had expired and requesting that PREPA submit a permit renewal application. On February 1, 2019, PREPA responded to the NOV, explaining that it had submitted a renewal application for the Monte del Estado UIC facility on June 22, 2018. Accordingly, PREPA requested that PREQB drop the case. No penalties were issued.</p>	5/31/2019
118	Environmental		In reviewing the e-room, there are a number of Notice of Violations and EPA consent decrees, what are the current environmental corrective actions and costs associated with the current agreements	Please clarify the specific NOV's/Consent Decrees to which this question is referring.	5/31/2019

#	Topic	Dataroom Reference	Question	Response	Date Answered
119	Environmental		It appears there are US Forest service permits and requirements for vegetation management on federal lands that expired in 2009, what permits and conditions for maintenance are currently in place?;	PREPA submitted the renewal application on time. The permit was split in three (Telecommunications, Transmission lines, and Rio Blanco). PREPA previously had a single special use permit/communications use lease from the U.S. Forest Service in the El Yunque Caribbean National Forest. The original U.S. Forest Service special use permit included the following three uses: a telecommunications site, power transmission lines, and a hydroelectric power project. However, going forward, the U.S. Forest Service has requested that PREPA obtain three separate individual permits/leases for this infrastructure located on federal lands. In March 2019, PREPA signed a 30-year lease issued by the U.S. Forest Service for PREPA's use of El Yunque for its telecommunications site, which is in the data room. See Folder 1.6.14.1. PREPA is still waiting for the U.S. Forest Service to sign and issue the fully executed lease document. Currently, PREPA is also working closely in conjunction with U.S. Forest Service to acquire the new permits/leases for its power transmission lines and the hydropower project. These two are in process. 2009 conditions remain in effect.	5/31/2019
120	Environmental		A number of no-action assurances from EPA existed through 6/2018; what current documents is PREPA operating under?	PREPA is operating under its regular Title V operation permits. PREPA is not currently operating under any no-action assurances from EPA. The last no-action assurance extension issued by EPA (dated June 29, 2018) for Clean Air Act requirements expired on July 31, 2018, subject to limited exceptions. Reports covered by the final no-action assurance extension were due 30 calendar days later. Certain narrow testing requirements were covered by the no-action assurance until August 31, 2018, and several reports were due by October 1, 2018, at the very latest. Private parties should look to the terms of each no-action assurance extension to identify the applicable expiration dates for specific Clean Air Act requirements. Note that, in general, each no-action assurance extension covers a narrower set of compliance issues than the prior no-action assurance. Thus, the no-action assurance expired for many requirements prior to the July 31, 2018 date.	5/31/2019
121	Environmental		It appears that in the 1970's a number of resolutions were passed by the local governments and Department of Agriculture to expand the system out into the country side based upon an engineering and construction plan known as JPE-22. All future siting documents reference that as the basis point, could we get a copy of that document?	Yes, it is in the data room. See Doc. 1.6.1.4.	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
122	Environmental		Under a number of these documents there are provisions for revising plans for improvements to the transmission or distribution system, what are the requirements from a federal and local siting/permitting standpoint to do minor improvements versus large scale improvements?	Each project should be evaluated individually to determine siting and permitting requirements.	5/31/2019
123	Environmental		Clarification of inconsistencies between local regulations (Junta de Calidad Ambiental) and EPA	Puerto Rico environmental regulations are not inconsistent with the EPA. Federal regulations are incorporated into Puerto Rico law. However, localities do occasionally have more stringent regulations than those required by the EPA.	5/31/2019
124	Regulatory		What are some of the key features of the net metering rules? (i.e., system size, carryover of production, pricing, % limits and/or targets, etc.)	For details on net metering regulations please refer files #1.4.13 and #1.4.14 in the data room.	5/31/2019
125	Planning / Contracts		Has PREPA had an Energy Efficiency market potential study done within the past 5 years? And does it have any EE programs?	An Energy Efficiency market potential study has not been completed within the past 5 years. 10 - 12 years ago there was an Energy Efficiency - Customer Awareness Program, mostly targeted towards residential customers.	5/31/2019
126	Transmission		What software does PREPA currently utilize to perform load flow analysis and calculate interconnection costs for new facilities?	Currently PREPA utilizes PSS/e by Siemens PTI.	5/31/2019
127	Transmission		What organization does the staff that performs this type of analysis reside in?	Analysis related to load flow and calculation of interconnection costs for new facilities is performed by the Transmission Planning Department.	5/31/2019
128	Human Resources & Labor		Provide a copy of complete organizational chart	For organizational charts please refer to folder #1.12.7 in the data room.	5/31/2019
129	Information Technology		Complete list of companies and entities they provide services to or receive services from and would require a transition services agreement in place	File no. 1.8 in the data room includes the relevant commercial contracts entered into by PREPA. For ease of reference we further include a key vendors' list that was prepared by PREPA for due diligence efforts in January 2019 (index 1.2.6). For additional reference and informational purposes only, we performed a query in the Puerto Rico Comptroller's website for all contracts entered into by PREPA during the current fiscal year, and included it in the data room in file 1.8.7. Please note that PREPA is required under law to register every contract but we cannot guarantee that the query is accurate.	5/31/2019
130	Environmental		Are there time restrictions for vegetation management	Please clarify.	5/31/2019
131	Transmission		Interconnection Costs / Load Flow Studies What software does PREPA currently utilize to perform load flow analysis and calculate interconnection costs for new facilities? What organization does the staff that performs this type of analysis reside in?	Load flow is done using PSS/e by Siemens. This task is performed by Transmission Planning Dept. Interconnection infrastructure requirements and cost estimation is done by Engineering & Design.	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
132	Regulatory		What is the process for increasing customer rates? What approvals are required? How much time is required?	PREPA must file a rate case with PREB in order to review and adjust customer rates (revenue requirement, rate structure and corresponding charges). PREB approved the current rate structure, which includes new and revised pass-through rate riders for fuel, purchased power, and subsidies charges. The first rate case took approximately 1 year from initial request to final resolution. In the interim, starting approximately two months after the initial request, PREB authorized a 1.3 cent per kWh provisional rate increase based on PREPA's initial request for a \$225 million rate increase. The final order authorized a 1 cent per kWh and \$170 million rate increase. This final order did not fully address PREPA's long term liabilities and pension underfunding, which are currently being dealt with through the Title III process.	5/31/2019
133	Regulatory		Does PREPA have any discretionary authority to increase rates without regulatory approval?	PREPA does not have discretionary authority to adjust rates on all rate components. It does have the ability to adjust pass-through rate riders on a quarterly or annual basis, subject to PREB evaluation and approval. Pass-through rate riders for fuel and purchased power are adjusted on a quarterly basis and can be adjusted more frequently if costs exceed a certain threshold.	5/31/2019
134	Environmental		Please post spill program procedures to the data room	Please see Docs. 1.6.25 and 1.6.26.	5/31/2019
135	Environmental		Please provide an updated log of all transformer spills	Please see Folder 1.6.8.2.5 for a log documenting spills from approximately 2012 to 2019.	5/31/2019
136	Environmental		Please post underground storage tank inspection plans to the data room	PREPA inspects USTs monthly in compliance with the Rule 819 of the of EQB UST regulation. Please see Folder 1.6.9.5 for Rule 819 and PREPA's UST inspection form.	5/31/2019
137	Environmental		How many community "right to know" programs filings are needed to be made?	PREPA files 33 SARA Tier II reports	5/31/2019
138	Environmental		Please provide budget for environmental compliance (including # of employee and related data)	The environmental division has 25 employees, with an administrative budget of \$2,420,362 dollars. The division has an additional \$10MM budget to address environmental issues, including but not limited to contracts, cleanup, removal, permit fees, penalties, and recycling, among others	5/31/2019

#	Topic	Dataroom Reference	Question	Response	Date Answered
139	Environmental		Are there any remaining substation transformers with PCBs that are still in service?	The statement in the Environmental Compliance Whitepaper regarding the 250 transformers that remain to be disposed of was intended to provide a rough estimate of the number of PCB-contaminated transformers (50 ppm - 499 ppm) that PREPA estimated to still be in service at the time of drafting to the best of PREPA's knowledge; however, the number of such transformers that are still in service could be more or less. There are approximately 1,088 PCB-contaminated transformers (50 ppm - 499 ppm) for which PREPA does not have electronic database documentation of removal or disposal. PREPA's lists of the transformers that are in this category for the relevant regions are in the data room. See Folder 1.6.8.5. PREPA's understanding is that many of these transformers have been removed from service and disposed of properly. Note that for the PCB-contaminated transformers that are still in service, TSCA does not require that they be removed from service provided that certain use conditions are met (e.g., the transformers cannot be leaking oil or in bad condition). Thus, these transformers are not necessarily in noncompliance.	5/31/2019
140	Environmental		How many of the identified PCB transformers that have been removed from service are yet to have been properly disposed of per federal law?	The statement in the Environmental Compliance Whitepaper regarding the 250 transformers that remain to be disposed of was intended to provide a rough estimate of the number of PCB-contaminated transformers (50 ppm - 499 ppm) that PREPA estimated to still be in service at the time of drafting to the best of PREPA's knowledge; however, the number of such transformers that are still in service could be more or less. There are approximately 1,088 PCB-contaminated transformers (50 ppm - 499 ppm) for which PREPA does not have electronic database documentation of removal or disposal. PREPA's lists of the transformers that are in this category for the relevant regions are in the data room. See Folder 1.6.8.5. PREPA's understanding is that many of these transformers have been removed from service and disposed of properly. Note that for the PCB-contaminated transformers that are still in service, TSCA does not require that they be removed from service provided that certain use conditions are met (e.g., the transformers cannot be leaking oil or in bad condition). Thus, these transformers are not necessarily in noncompliance.	5/31/2019
141	Environmental		Please provide the number of SPCC program plans that need to be updated for the technical district offices	22	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
142	Environmental		Does PREPA require biannual certifications for emergency generators? How many such generators are on the system?	PREPA is not required to obtain biannual certifications for emergency generators. Instead, permits are issued for five years, and PREPA is required to maintain records of their operation. PREPA currently has 149 emergency generators across all facilities.	5/31/2019
143	Environmental		How large is the environmental division? What kind of budget does the division have?	The environmental division has 25 employees, with an administrative budget of \$2,420,362 dollars. The division has an additional \$10MM budget for FY 2018-2019 to address environmental issues, including but not limited to contracts, cleanup, removal, permit fees, penalties, and recycling, among others	5/31/2019
144	Financial Model		The documents presented in San Juan entitled "Puerto Rico Energy Transformation" contained several org charts for various groups and sub-groups reporting to each Directorate, but not for all. Please provide all available org charts (including headcounts) for the entire PREPA organization to the level of detail that is available.	For organizational charts please refer to folder #1.12.7 in the data room.	5/31/2019
145	Transmission		When was the San Juan Central Loop (underground) put in service (constructed initially)? We are looking for average age of line and major equipment.	Most of the San Juan Central loop was placed in service in between 2007 - 2009. For additional details on age by line please see below: Línea 40500 Monacillo T.C. – Hato Rey T.C. November 2007 Línea 39300 Hato Rey T.C. – Martín Peña T.C. October 2008 Línea 40000 Martín Peña T.C. – Viaducto T.C. October 2008 Línea 39200 Viaducto T.C. – Isla Grande T.C. October 2008 Línea 38000 Isla Grande T.C. – San Juan S.P. December 2009 Línea 41600 San Juan S.P. – Palo Seco S.P. December 2009 Línea 40700 Palo Seco S.P. – Bayamón T.C. September 2008 Línea 40600 Bayamón T.C. – Monacillo T.C. September 2008	5/31/2019
146	Regulatory		Can you provide a historical (10 year history) for all billing rate riders?	Please refer to file #1.4.12 in the data room.	5/31/2019
147	Environmental		What is the current annual spend on environmental compliance initiatives (excluding salaries)?	Current FY 2018-19 PREPA has spent an approximate \$5MM.	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
148	Environmental		What is the current annual spend on NOVs, fines, penalties, Consent Decrees, Consent agreements, etc. and which of these are recurring required payments?	During Current FY 2018-19 PREPA has spent an approximate \$2.5MM, which includes 1999 Consent Decree Stipulated Penalties, annual Title V emissions fees, and payments under the Palo Seco Depot Superfund Settlement Agreement and Vega Baja Superfund Site Consent Decree.	5/31/2019
149	Environmental		What is the potential for involvement in the Vega Baja Superfund site?	PREPA expects there to be no potential for involvement.	5/31/2019
150	Environmental		Is there a current map of the system that shows environmental features (rivers, wetlands, bird nests, etc) either in GIS or paper format?	PREPA has available GIS layers of information from the Planning Board to make environmental assessments.	5/31/2019
151	Environmental		How will regulations that PREPA is exempt from impact the 3rd party operator?	Please identify specific regulations to which this question is referring.	5/31/2019
152	Environmental		Is there an environmental org chart that shows responsibilities?	PREPA will upload an environmental organization chart to the dataroom. See Folder 1.6.31.	5/31/2019
153	Environmental		Please confirm that there are no remaining elements of the 1999 Consent Decree from the EPA that impact the T&D Operations (Reference VDR 1.6.21). If available, please provide the documentation that demonstrates the release from the Consent Decree for the elements that impacted the T&D Operations.	The Consent Decree programs primarily apply to PREPA's four baseload generating plants; however, certain programs also apply to the Monacillos Transmission Center, a non-generation facility. Under the Consent Decree, PREPA was required to submit a Spill Prevention, Control, and Countermeasure ("SPCC") plan for the Monacillos Transmission Center. PREPA submitted an SPCC plan for the Monacillos Transmission Center, which was approved by EPA in 2003. The Monacillos Transmission Center was also subject to the Consent Decree's Underground Storage Tank Compliance Program. In compliance with the Consent Decree, PREPA certified to EPA that all underground storage tanks ("USTs") at the Monacillos Transmission Center had been permanently closed on site or removed, thus completing the Consent Decree's requirements for that program for the facility. The EPCRA and CERCLA programs also generally applied to the Monacillos Transmission Center. PREPA also considers these programs to have been completed. Folder 1.6.21.3 contains a request for partial termination of the Consent Decree, which provides documents regarding PREPA's completion of various Consent Decree programs. There is no "release" from the Consent Decree for elements that impact T&D operations. PREPA remains in the process of renegotiating the 1999 Consent Decree with the United States to terminate programs that have been completed.	5/31/2019
154	Environmental		What will be the responsibility and obligation of the new T&D operator with respect to the management of the Vega Baja site and superfund (Reference VDR 1.6.28)?	PREPA expects there to be no management obligations.	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
155	Environmental		On what basis is PREPA currently exempted from the Section 47.1 of the Construction and Land Use Permit that regulates the cutting of trees? Will that exemption be applicable to the new T&D Operator, and by what mechanism will that occur?	The Puerto Rico Planning Board's Joint Regulation of Permits for Construction Works and Land Use contains an exemption for tree cutting within PREPA rights of ways ("ROWs"). The Joint Regulation went into effect in 2010, but an amended version of the regulation is set to take effect on June 7, 2019. Volume III (permits for development and business); Section 3.4.1.2 (applicability); Subsection C.2.c (authorization of cutting, pruning, transplantation and planting of trees); indicates the following: dispersions of this chapter do not apply: to cutting and pruning performed by any agencies that are empowered by law to do so, as is PREPA. The June 7, 2019 version of the regulation is available at http://jp.gobierno.pr/Portals/0/Borradores%20VP/Reglamento%20Conjunto%202019/REGLAMENTO%20CONJUNTO%202019%20[R P-38]%20Final%20Aprobado%20vig%207junio2019.pdf?ver=2019-05-09-223107-527 .	5/31/2019
156	Environmental		Please provide of summary of all current matters with the environmental agency pertaining to management of PCB's (Reference VDR 1.6.8).	PREPA has transformers that contain PCBs that are still in service. For PCB Contaminated Transformers (50-499 ppm) that are still in service, the Toxic Substances Control Act does not require that they be removed from service provided that certain use conditions are met (e.g., the transformers cannot be leaking oil or in bad condition). Thus, these transformers are not necessarily in noncompliance.	5/31/2019

#	Topic	Dataroom Reference	Question	Response	Date Answered
157	Environmental		Has PREPA resolved all of the Notice of Violations with respect to the underground storage tanks for gasoline and diesel (Reference VDR 1.6.9)? Has PREPA put in place suitable procedures to properly post documentation and do integrity tests on the tanks? If so, please provide the documentation. Are any directives related to the 1999 Consent Decree still in place?	<p>PREPA received 3 NOVs related to USTs within the last year or so, at the Utuado, Humacao and Arecibo workshops. For Humacao, EQB agreed not to proceed with enforcement of the NOV. For Utuado, PREPA is awaiting EQB acceptance of a stipulation that will resolve this matter, under which PREPA would pay a penalty of \$1000. To become final, the Secretary of the Puerto Rico Department of Natural and Environmental Resources must approve the stipulation. For Arecibo, PREPA responded to the NOV, providing documentation related to compliance, but has not yet received a response from PREQB regarding the NOV.</p> <p>PREPA follows the EQB regulation for integrity testing. PREPA inspects USTs in compliance with the Rule 819 of the of EQB UST regulation. Please see Folder 1.6.9.5 for Rule 819 and PREPA's UST inspection form.</p> <p>The 1999 Consent Decree contains an Underground Storage Tank Compliance Program that applied to PREPA's power plants and the Monacillos Transmission Center. In compliance with the Consent Decree, PREPA certified to EPA that all USTs at the Monacillos Transmission Center had been permanently closed on site or removed, thus completing the Consent Decree's requirements for that program for the facility. Folder 1.6.21.3 contains a request for partial termination of the Consent Decree, which contains documents related to PREPA's completion of various Consent Decree programs, including the UST Compliance Program. Note that PREPA remains in the process of renegotiating the Consent Decree with the United States to terminate programs that have been completed.</p>	5/31/2019

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#	Topic	Dataroom Reference	Question	Response	Date Answered
158	Environmental		Does PREPA have information or records to demonstrate compliance for the underground injection of sanitary water for each site (Reference VDR 1.6.13)? If so, please provide. For those locations where an authorization has not been obtained, does PREPA have a plan to obtain the authorization and to demonstrate compliance? Would this be an obligation of the new T&D operator to fix?	The only sites with authorization are the Utuado Technical District and Monte del Estado Telecommunication Station. Please see Data Room Folder 1.6.13. Given the large number of PREPA UIC facilities, PREPA has been developing compliance plans in a step-by-step fashion. For UIC facilities for which PREPA wishes to cease underground injection activities instead of continuing to operate (and attaining the requisite permit), the regulation allows PREPA to develop an alternate compliance plan for closing the UIC facility. Due to the large number of PREPA UIC facilities, PREPA presented a two-phase compliance plan to PREQB. The first phase includes the preparation and implementation of compliance plans for PREPA's power plants. Once this first phase is completed, PREPA expects to move to the second phase which would cover other PREPA facilities, including T&D facilities. PREPA is still working on compliance activities at its power plant facilities. Whether compliance is going to be an obligation of the operator should be discussed as part of the legal agreement negotiations.	5/31/2019
159	Environmental		Does PREPA have any reports to the agency or internally that would describe compliance with the light pollution law (Reference VDR 1.6.15)?	Not at this time.	5/31/2019
160	Environmental		Does PREPA have any reports to the agency or internally that would describe compliance with the emergency generator permits (Reference VDR 1.6.15)? Are records maintained with respect to hours of operations of each generator?	We do not have reporting requirements. Each generator operator is responsible for the recordkeeping required.	5/31/2019