3PPO
Third-Party Procurement Office

April 30, 2026

Josué Colón
Executive Director
Puerto Rico Public-Private Partnerships Authority
San Juan, Puerto Rico

Re: Costa Sur Interconnection Constraints and Gotham Energy Temporary Generation Project

Dear Mr. Colón:

The Third-Party Procurement Office ("3PPO") respectfully submits this communication to inform the Puerto Rico Public-Private Partnerships Authority ("P3A") of the technical and interconnection concerns recently identified regarding the potential relocation of the Gotham Energy temporary generation project to the Costa Sur site.

As discussed during the meeting held on April 16, 2026, with representatives of the Financial Oversight and Management Board ("FOMB"), the Puerto Rico Electric Power Authority ("PREPA"), P3A, and the Puerto Rico Energy Bureau ("PREB"), it was recommended that the Gotham Energy project be evaluated for relocation to Costa Sur due to the ongoing complications associated with the San Juan Bay project.

Following that discussion, the 3PPO convened a coordination meeting on April 28, 2026, at Recoms offices, with representatives from Genera PR, LUMA Energy, and P3A, to assess the feasibility of moving the Gotham Energy temporary generation project back to Costa Sur. The purpose of the meeting was to review existing and proposed generation projects at Costa Sur, verify interconnection capacity with LUMA, and determine whether the 115kV substation could accommodate the additional 200MW floating power barge project.

During the meeting, it was made clear that the available interconnection capacity at the Costa Sur 115kV substation is already committed or expected to be occupied by other projects currently in advanced stages of development. Specifically, the discussion identified two Genera PR projects — the 30MW Battery Project, scheduled for Q4 2026, and the 100MW Peaker Project, scheduled for Q2–Q3 2027 — as well as one independent project, the 100MW Peñuelas

Battery Project, scheduled for Q3 2027. All three projects would connect to the 115kV system. Together, these projects represent approximately 230MW of proposed or committed injection capacity, which exceeds the approximately 200MW of available injection capacity identified for the Costa Sur 115kV bus.

Based on the information provided during the April 28, 2026 meeting, it is the 3PPO's understanding that there is no currently available interconnection capacity at the Costa Sur 115kV substation to accommodate the Gotham Energy 200MW temporary generation project without displacing, delaying, or otherwise affecting projects already under development. In addition, LUMA indicated that its full interconnection process, including facility studies and potential system upgrades, would need to be completed before any project could connect, which could materially affect the proposed commercial operation timeline.

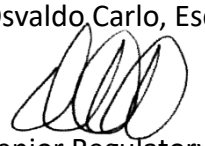
The meeting also highlighted that sequencing multiple projects at the same substation would require careful planning to avoid construction conflicts and grid reliability risks. Moreover, any upgrade work to the 115kV infrastructure, although technically possible, would require additional time and coordination and could further delay the accommodation of new generation at Costa Sur.

In light of the foregoing, the 3PPO respectfully advises P3A that the relocation of the Gotham Energy project to Costa Sur may not be feasible under the current interconnection conditions. Accordingly, the 3PPO recommends scheduling a follow-up meeting with FOMB, PREB, PREPA, and P3A to discuss the possibility of maintaining the Gotham Energy project at the San Juan location, as previously proposed, or otherwise identifying an alternative path forward that does not interfere with existing projects already planned for Costa Sur.

Given the importance of this project and the potential impact on the temporary generation procurement process, the 3PPO believes that this matter should be addressed promptly with the relevant governmental and regulatory stakeholders to ensure alignment before final contract execution.

Please let us know your availability to coordinate the proposed follow-up meeting.

Respectfully,
Osvaldo Carlo, Esq.



Senior Regulatory Compliance Officer
Third-Party Procurement Office (3PPO)