3PPO
Third-Party Procurement Office

MEETING MINUTES

Date: April 30, 2025
Time: 10:00 a.m.
Location: RECOMS Offices

Participants:

- Osvaldo Carlo (Recoms)
- Mariela Quiñones (Recoms)
- Mr. Collazo (U.S. Coast Guard)
- Captain Rodríguez (U.S. Coast Guard)

Topics Discussed

1. General Context of the Procurement Process

- A competitive process is underway to contract temporary emergency generation solutions.
- Proposals are expected to include power barge solutions.
- The goal is to have generation available by summer, which imposes a very limited window for planning, permitting, and installation.

2. Coast Guard Authorities and Jurisdiction

- Captain Rodríguez explained that the U.S. Coast Guard operates under five legal authorities, including Title 33 (protection of navigable waters) and Title 46 (vessel safety).
- He confirmed that the Coast Guard cannot issue permits on its own; any project of this nature requires coordination with multiple federal and state agencies.

3. Permitting and Regulatory Compliance

- A floating solution such as a power barge requires approvals from:
  - U.S. Coast Guard (USCG)
  - Maritime Administration (MARAD)
  - U.S. Army Corps of Engineers (USACE)
  - Environmental Protection Agency (EPA)
  - NOAA
  - U.S. Fish and Wildlife Service
  - Puerto Rico Department of Natural and Environmental Resources (DRNA)
- The estimated duration of the full permitting process is 12 months or more.
- Transmission lines may be considered fixed infrastructure.
- Captain Rodríguez indicated that the only way to bypass these regulatory processes would be through the issuance of a presidential waiver.
- The Coast Guard also highlighted the uphill process of securing approvals for ship-to-ship (STS) transfers, stressing that the procedure is complex and time-consuming, in some cases even requiring public hearings before authorization is granted. Beyond the Coast Guard's own oversight, STS transfers may involve additional permitting requirements, such as:
  - Environmental permits (EPA and Puerto Rico EQB/DNER, particularly for potential discharge, emissions, or spill risks).
  - USACE permits (if navigable waters are affected or if infrastructure modifications are required).
  - FERC/DOE review (if LNG import/export or regasification operations are implicated).
  - Local maritime/port authority permits (harbor operations and safety).
  - Community/public hearing processes mandated under NEPA or Puerto Rico planning laws, especially for recurring or large-scale STS operations.
- The Coast Guard stressed that without these clearances, an STS transfer cannot legally proceed.

4. Technical and Operational Requirements of Barges

- Barges require a draft of 22 to 38 feet, meaning that most ports would require dredging.
- Such dredging requires environmental studies, permits, and interagency coordination.
- Barges cannot operate continuously without a Floating Storage Unit (FSU).

5. Hurricane Considerations

- If Puerto Rico falls within a hurricane cone, the Coast Guard issues port closure orders.
- Barges must be mandatorily removed from the port.
- Their relocation requires tugboats and coordination with alternate safe ports.

- In case of a vessel or container sinking, Puerto Rico does not have its own sonar equipment to verify it.
- Coordination with other jurisdictions is necessary for technical support. Currently, the required cranes are only available in New Orleans and Charleston.
- This implies prolonged waiting times and competition with other states if the hurricane continues its trajectory north.

Conclusions

- The implementation of power barge generation solutions presents logistical, regulatory, and timing challenges that make it unfeasible for summer deployment.
- The permitting involved requires multiple federal and state approvals.
- The only way to accelerate these processes would be through a presidential waiver.
- Vulnerability to hurricanes further limits its reliability as a solution.

Next Steps

- Prepare a technical and regulatory report for the evaluation committee.
- Recommend alternatives that do not require dredging or extensive permitting processes.
- Notify the corresponding entities about the need to make decisions based on viable solutions.