REGULATORY COMPLIANCE SERVICE
1509 CALLE LOPEZ LANDRON PH
SAN JUAN PR 00911
787-300-6483

Invoice: 26-02-01-L (LUMA)
Invoice Date: 2026-02-28

Bill To: **PR ELECTRIC POWER AUTHORITY,represented by its agent, PR PUBLIC-PRIVATE PARTNERSHIPS AUTHORITY**
Contract Num: 2026-PPP003

Operator	Work Order #	Project #	WBS Task Name	Professional Name	Labor Cat	Date	Hours	HR/RATE	Description (detail)	Total
LUMA	12	(12) Workforce Augmentation 3PPO-0909-14-WA-02	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/5/2026	0.5	$ 105.00	Monitored the event messaging system to track all communications, resolve issues in real-time, and maintain detailed records for audit and compliance. Additionally, monitored stakeholder emails and responses to manage and deliver new orders and petitions between stakeholders and proponents, ensuring timely and accurate information flow.	$ 52.50
LUMA	9	(9) EPC Substation 3PPO-0703-11-SUB-03-Batch2	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/5/2026	0.5	$ 105.00	Monitored the event messaging system to track all communications, resolve issues in real-time, and maintain detailed records for audit and compliance. Additionally, monitored stakeholder emails and responses to manage and deliver new orders and petitions between stakeholders and proponents, ensuring timely and accurate information flow.	$ 52.50
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/11/2026	1	$ 105.00	Facilitated a work session with P3A to review the Project Labor Agreement (PLA) process, align on compliance requirements, and establish a coordinated approach for implementation and stakeholder management.	$ 105.00
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/16/2026	0.5	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 52.50
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/17/2026	0.5	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 52.50

LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/18/2026	1	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 105.00
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/19/2026	1	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 105.00
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/20/2026	1	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 105.00
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Tendering - T0212	Fabian Velez	IT/Data Specialist	2/25/2026	1	$ 105.00	Managed the facilitation, formatting, editing, and conversion of key documents and correspondence. Conducted analysis and refined reports and Excel tables for clarity. Oversaw critical organizational processes, including the systematic archiving of original documents and the secure deletion of redundant copies to streamline the repository for the 3PPO evaluation, legal, and procurement teams.	$ 105.00
							7			**$ 735.00**
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/3/2026	1	$ 189.00	Legal services were rendered in connection with participation in a coordination meeting between the Third-Party Procurement Office and the Puerto Rico Public-Private Partnerships Authority concerning Project Labor Agreement policy matters. Services included legal analysis of implementation parameters, evaluation of transitional application to active procurements, assessment of compliance and funding implications, and alignment of interagency guidance to ensure uniform and defensible application of public policy within ongoing contracting processes.	$ 189.00

LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/3/2026	3	$ 189.00	Legal services were rendered in connection with comprehensive legal research to support a formal policy clarification letter regarding the interpretation and application of Executive Order OE-2025-015 on Project Labor Agreements. Work included research and analysis of the Executive Order's operative requirements and intent, review of applicable federal procurement principles governing full and open competition (including 2 C.F.R. Part 200 concepts referenced in the draft), assessment of how mandatory or evaluative PLA requirements can create restrictive procurement conditions, and development of legally defensible framing to preserve procurement integrity and federal funding eligibility while maintaining an accurate, non-adversarial governmental posture.	$ 567.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/3/2026	2	$ 189.00	Legal services were also rendered in connection with the redaction, restructuring, and refinement of the draft letter to ensure clarity, precision, and consistency with the intended "clarificatory" purpose of the communication. This work included revising language to avoid unintended findings of noncompliance, strengthening the articulation of the voluntary nature of PLAs from the proposer's perspective, improving the logical sequencing of policy points and compliance rationale, and tailoring tone and terminology for executive-level delivery, with attention to preserving the record value of the correspondence and minimizing litigation, audit, and interagency governance risk.	$ 378.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/4/2026	2	$ 189.00	Legal services were further rendered in connection with the redaction, refinement, and structural reorganization of the draft letter to ensure clarity, precision, and defensible policy alignment. This included strengthening the explanation of the voluntary nature of PLAs, removing language that could be construed as accusatory or as a formal finding of non-compliance, reinforcing the federal funding compliance rationale, and aligning tone and sequencing for executive-level delivery while preserving the administrative record and minimizing litigation or audit risk	$ 378.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/11/2026	3	$ 189.00	Reviewed and refined draft language concerning the proposed engagement of Core3 for federal procurement and compliance analysis related to the Department of Justice opinion on Executive Order 2025-015 and Project Labor Agreement policy, confirming accuracy of referenced Order language and ensuring precise characterization of PLAs as optional under current public policy.	$ 567.00

LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Francisco Amill	LEGAL ADVISOR	2/11/2026	2	$ 189.00	Conducted legal analysis and redaction of the Core3 engagement request to emphasize expertise in federal grant administration and compliance rather than general procurement expertise, refining language to address federal funding conditions, audit exposure risk, and transitional application of PLA policy to safeguard funding eligibility and minimize disallowance exposure.	$ 378.00
							13			$ 2,457.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/3/2026	0.5	$ 160.00	Conducted coordination meeting with Juan González, Legal Counsel – P3A, Rubén Lugo, Contract Manager – P3A, Osvaldo Carlo, Senior Regulatory Compliance Officer – RECOMS, Francisco Amill, Legal Counsel – RECOMS, Vicente Díaz, Senior Legal Counsel – RECOMS, and Fabián Vélez, Data Manager – RECOMS, to evaluate correspondence received regarding information requirements necessary to advance execution of the Qantas contract. Reviewed requested documentation, assessed regulatory and contractual implications, and aligned procedural next steps to support compliant progression toward contract signature.	$ 80.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/4/2026	1	$ 160.00	Conducted coordination meeting with Juan Saca, President – LUMA Energy, Juan Rogers, Chief Procurement and Supply Chain Officer – LUMA Energy, and Osvaldo Carlo, Senior Regulatory Compliance Officer – RECOMS, to review overall project status and address ongoing operational and contractual considerations. Discussed procurement alignment, compliance positioning, and next steps to mitigate ongoing concerns and support continued project execution.	$ 160.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/9/2026	0.5	$ 160.00	Conducted coordination meeting with Rubén Lugo, Contract Manager – P3A, and Miguel García, Project Manager – RECOMS, regarding prior discussions with LUMA concerning the Project Labor Agreement (PLA) and the applicability of the Executive Order. Confirmed issuance of a formal clarification letter to LUMA outlining RECOMS' position to facilitate progression of the RFP process and address compliance considerations.	$ 80.00

LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/10/2026	0.25	$ 160.00	Followed up with Juan González, Legal Counsel – P3A, regarding guidance and procedural instructions related to the applicability of the Project Labor Agreement (PLA) in connection with execution of the Qantas contract. Confirmed required compliance steps and alignment necessary to advance toward contract signature.	$ 40.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/12/2026	1	$ 160.00	Reviewed and validated draft correspondence prepared by Francisco Amill, Legal Counsel – RECOMS, addressed to P3A, requesting consultation with COR3 regarding the retroactive application of the Executive Order in connection with the Project Labor Agreement (PLA). Assessed legal framing, regulatory implications, and clarity of position to ensure accurate and defensible communication prior to issuance.	$ 160.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/13/2026	0.5	$ 160.00	Working with Lionel Santa P3A legal council in regards to the letter sent to P3A pertaining to the PLA meeting that should be coordinated with Cor3 to finalize the issue with the PLA application	$ 80.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/24/2026	0.25	$ 160.00	Call with Ezequiel Nieves from P3A to discuss status of the consultation to COR 3 regarding PLA.	$ 40.00
LUMA	7	(7) Distribution Poles and Conduct Repairs 3PPO-0328-08-DP-03	Contract Development - T0213	Mariela Quiñones	Program Manager	2/25/2026	0.5	$ 160.00	Conducted coordination meeting with the LUMA Energy team, Rubén Lugo, Contract Manager – P3A, Fabián Vélez, Data Manager – RECOMS, and Yolanda Vélez, Engineer – RECOMS, to verify the current status of contract execution and address related contractual and operational concerns. Reviewed outstanding items, execution timeline considerations, and compliance requirements to support progression toward formal contract signature.	$ 80.00
							4.5			$ 720.00
LUMA	3	(3) Distribution Line Construction 3PPO-1123-01-DL-03	Contract Development - T0213	Yolanda Velez	Technical Specialist /Engineer	2/24/2026	0.5	$ 165.00	Call with Ezequiel Nieves from P3A to discuss status of the consultation COR 3 regarding PLA.	$ 82.50

LUMA	7	(7) Distribution Poles and Conduct Repairs 3PPO-0328-08-DP-03	Contract Development - T0213	Yolanda Velez	Technical Specialist /Engineer	2/24/2026	0.5	$ 165.00	Call with Ezequiel Nieves from P3A to discuss status of the consultation COR 3 regarding PLA.	$ 82.50
LUMA	1a	(1a) Luma Contract Mgmt 3PPO-01-04-01-LCM-03	Contract Development - T0213	Yolanda Velez	Technical Specialist /Engineer	2/25/2026	1	$ 165.00	Meeting with the Luma team, Ruben Lugo from P3A, LUMA and 3PPO to verify the status of the signature of the contract and other concerns related to it.	$ 165.00
							2			$ 330.00
							26.5		Subtotal	$ 4,242.00
									Sales tax	
									Total Invoice Amount	$ 4,242.00

"We certify under penalty of nullity that no public servant of the Puerto Rico Electric Power Authority, the Puerto Rico Public-Private Partnerships Authority or the Operators, as defined in the Professional Services Agreement, will derive or obtain any benefit or profit of any kind from the contractual relationship which is the basis of this invoice. If such benefit or profit exists, the required waiver has been obtained prior to entering into the Agreement. The only consideration to be received in exchange for the delivery of goods or for the Services provided is the agreed-upon price that has been negotiated with an authorized representative of Puerto Rico Public-Private Partnerships Authority. The total amount shown on this invoice 26-02-01-L (LUMA) on FEBRUARY 28, 2026, is true and correct. The Services have been rendered, and no payment has been received in respect thereof".

Contractor's Signature