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BY ELECTRONIC MAIL

November 10, 2025

Mr. Ricardo Pallens Cruz
Vice President EEHS & Regulatory
Genera PR, LLC

Re: Engineering Services International, LLC (RFP No. 221853)

Dear Mr. Pallens Cruz,

In accordance with the Contract Review Policy (the “Policy”) of the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), established pursuant to Section 204(b)(2) of PROMESA, we have reviewed the proposed contract between Genera PR, LLC, as agent to the Puerto Rico Electric Power Authority (“PREPA”), and Engineering Services International, LLC (the “Proposed Contract”).

After reviewing the Proposed Contract, the Oversight Board concludes “Approved with Observations.” Observations related to the Proposed Contract are set forth in Appendix A attached hereto.

Our review is solely limited to compliance of the Proposed Contract with Section 204(b)(2) of PROMESA, which seeks to ensure proposed contracts promote market competition and are not inconsistent with approved Fiscal Plans. For the avoidance of doubt, the review performed by the Oversight Board does not constitute a legal review of the contractual documentation or the contracting process, including without limitation: (i) compliance with contracting requirements under applicable laws, rules, and regulations, both federal and local; and (ii) compliance with applicable laws, rules, and regulations governing procurement activities, both federal and local.

In addition, the Oversight Board has not engaged in any due diligence or background check with respect to the contracting parties nor whether the contracting parties comply with the requirements under the applicable contract. Any material changes to the Proposed Contract must be submitted to the Oversight Board for review and approval **prior to execution**.

Date: 11/10/2025

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Recipient: Mr. Pallens Cruz

This letter is delivered as of the date hereof and we reserve the right to provide additional observations and modify this letter based on information the Oversight Board was not directed to when the review was conducted. In addition, during the course of our review, we may receive information that we may refer to the relevant authorities.

This letter is issued only to Genera and solely with respect to the Proposed Contract.

Sincerely,



Jaime A. El Koury
General Counsel

APPENDIX A

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GENERA PR, LLC – ENGINEERING SERVICES INTERNATIONAL, LLC

Fiscal Plan Alignment

This review covers the Proposed Contract between Genera, as agent to PREPA, and Engineering Services International, LLC (the “Contractor”) for the engineering, design, fabrication, inspection, testing, transportation, and supply of two 4.16 kV outdoor non-walk in metal-clad switchgears for Units 2 and 3 of the Aguirre Combined Cycle Power Plant.

The Proposed Contract stems from competitive procurement process no. 221853 awarded on March 20, 2025 (the “RFP”).¹ It has a maximum payable amount of **\$4,651,884** and a Guaranteed Final Completion Date of up to **357 days** from the issuance of the Notice to Proceed. We remind Genera that any extensions or change orders to the Proposed Contract must be submitted to the Oversight Board for review and approval prior to execution in accordance with the Policy.

Genera has certified that the Proposed Contract shall be covered entirely with federal funds stemming from the Federal Emergency Management Agency (FEMA), which are allocated in **Account Nos. 01-1071-31101-KOE-663-100FG0109057** and **01-1071-31101-KOE-663-100FG0109513**. As such, the Oversight Board’s review indicates that Genera has sufficient budgeted funds in Fiscal Year 2026 to cover the cost of the Proposed Contract as of the date of this letter.

This determination does not consider the extent to which total available funds will be subsequently encumbered by Genera throughout the Proposed Contract’s term. Consequently, we rely on Genera’s budget certification for purposes of this review.

Genera is expected to inform the Oversight Board of any budgetary differences other than those specified in Appendix A to the Policy (Contract Submission Questionnaire) and to request a re-review of the Proposed Contract should any changes occur.

Finally, the following observations are based on 2 CFR 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards” and other relevant federal funding requirements:

Observation	Suggested Action
1. Genera submitted the following documentation and clarifications in response to a request for information (“RFI”) from the Oversight Board: <ul style="list-style-type: none">a. RFP Attachments A-D and Exhibits A-Gb. Attachment A (SOW) to the Proposed Contract	Genera should retain all documentation and information provided in the initial submission along with subsequent responses to RFIs in the procurement file.

¹ Genera received 54 requests to participate in the RFP process from potential vendors. Of these, three submitted proposals.

APPENDIX A

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<p>1. In response to an RFI from the Oversight Board, Genera indicated that the Contractor confirmed that the proposal submitted remains valid through October 31, 2025. Such validity period has now expired.</p>	<p>Genera should confirm that the Contractor's proposed pricing remains valid and firm through the date of contract execution.</p>
<p>3. An active SAM.gov debarment check for the Contractor was not included in the original submission package.</p> <p>In response to an RFI from the Oversight Board, Genera provided a screenshot of SAM.gov showing that the Contractor does not currently have an active registration. However, Section 3 in Attachment M to the Proposed Contract includes a clause for debarred and suspended parties.</p>	<p>Genera should consider encouraging all contractors and subcontractors to maintain active SAM.gov registrations. In addition, Genera should conduct regular debarment checks on all contractors and subcontractors and retain the documentation in the procurement file.</p>

This review was conducted on the basis of information submitted by Genera. The Oversight Board has not independently verified the information included in the submission. Should the Oversight Board become aware of any inaccuracies or misrepresentations – whether intentional or not – it would re-evaluate its assessment.