

segments assigned by PREPA to WEH, which constitutes part of the backbone of the transmission system in the area. (See chart² attached hereto as Exhibit A).

7. Todd W. Filsinger of Filsinger was appointed PREPA's Chief Financial Officer on December 1, 2017. As part of his appointment, he uses the services of other professionals at Filsinger to perform his tasks, upon approval of PREPA's governing board.

8. WEH has submitted invoices to PREPA for work performed and for mobilization and demobilization costs totaling approximately \$141 million. To-date, WEH and its subcontractors are still owed over \$100 million.

9. WEH has provided all of the documentation requested by PREPA in order to prepare Project Worksheets and other necessary documentation to request reimbursement and/or payment of WEH's invoices from the Federal Emergency Management Agency ("FEMA"). However it has been over five (5) months since the termination of the WEH Contract, and PREPA and its professionals have *still* not submitted that documentation to FEMA.

10. It is now apparent from the Fee Application that Filsinger is not devoting the resources that are even minimally necessary to complete the FEMA submission of WEH's invoices, which in turn will represent a reimbursement to PREPA; this is not in the best interests of the estate and its creditors.

11. Even though WEH was the first on the island to begin repairs to Puerto Rico's transmission and distribution lines, PREPA's professionals have not dedicated the necessary time and resources to prepare the documentation required to seek FEMA reimbursement for WEH's work. Yet PREPA submitted the necessary documentation for PREPA's other contractor, Cobra Acquisitions, LLC ("Cobra"), leading to FEMA's approval of that contract in December 2017.

² This chart is part of PREPA's April 2, 2018 disclosure to bondholders and other parties in this case. The entire disclosure may be found here: <https://emma.msrb.org/ES1133133-ES886774-ES1288166.pdf>.