

COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU

NEPR

Received:

Mar 6, 2020

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IN RE:

INTEGRATED RESOURCE PLAN FOR THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO.: CEPR-AP-2018-0001

SUBJECT: PETITION OF PROGRESSION
ENERGY TO INTERVENE

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL
FOR PROGRESSION ENERGY**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW the undersigned counsels and respectfully states, alleges and claims as follows:

1. Ledesma & Vargas, LLC., through attorney Mariana Ortiz Colón and Diaz & Negron LLC, through attorney Raúl Negrón Casasnovas, were retained by Progression Energy (“PE”) for legal representation in this case.
2. The attorney-client relationship has been irretrievably broken.
3. PE has been advised that there are irreconcilable differences and that the undersigned would be petitioning the Bureau for leave to withdraw as counsels.
4. Moreover, PE has been advised and understands the need to retain a new legal representation in this matter. However, at this time, a succeeding attorney is not known.
5. PE’s contact information is as follows:

Progression Energy

Josh Franklin
Chief Development Officer
1300 NW Northrup St.
Portland, OR 97209
Phone: 773-531-8526

Email: jfranklin@progression-energy.com

6. A copy of this Motion is being notified to PE.

THEREFORE, Ledesma & Vargas, LLC. and Diaz & Negron LLC, through attorneys Mariana Ortiz Colón and Raúl Negrón Casasnovas, respectfully requests the Puerto Rico Energy Bureau to grant this Motion for Leave to Withdraw as Counsels for Progression Energy.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 6 DAY OF MARCH 2020.

CERTIFICATION OF FILING AND SERVICE

I hereby CERTIFY that on **March 6, 2020**, I have sent the above Motion to the Puerto Rico Energy Bureau through its electronic filling tool at <https://radicacion.energia.pr.gov>; and to secretaria@energia.pr.gov and wcordero@energia.pr.gov; the Bureau's Office of Legal Affairs to legal@energia.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez n-vazquez@aeep.com; Astrid I. Rodríguez Cruz astrid.rodriguez@prepa.com; Katuska Bolaños kbolanos@diazvaz.law and to Jorge R. Ruíz Pabón Jorge.ruiz@prepa.com. And to: acarbo@edf.org; javier.ruajovet@sunrun.com; pedrosaade5@gmail.com; rmurthy@earthjustice.org; carlos.reyes@ecoelectrica.com; cfc@tcmrslaw.com; victorluisgonzalez@yahoo.com; mgrpcorp@gmail.com; hrivera@oipc.pr.gov; jrivera@cnslpr.com; manuelgabrielfernandez@gmail.com; acasellas@amgprlaw.com; corey.brady@weil.com; paul.demoudt@shell.com; agraitfe@agraitlawpr.com; castrodieppalaw@gmail.com; voxpathulix@gmail.com; cfl@mcvpr.com; sierra@arctas.com; tonytorres2366@gmail.com; info@liga.coop; amaneser2020@gmail.com; escott@ferraiuoli.com; sproctor@huntonak.com; mpietrantoni@mpmlawpr.com; apagan@mpmlawpr.com; sboxerman@sidley.com; bmundel@sidley.com; jfranklin@progression-energy.com

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