

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

NEPR Received: Apr 26, 2021 11:41 PM

IN RE: REVIEW OF PUERTO RICO
ELECTRIC SYSTEM
REMEDICATION PLAN

CASE NO. CEPR-MI-2020-0019

SUBJECT: Request for brief extension of time to respond to Resolution and Order of April 23, 2021 on the Bureau’s Determination of “Confidential Designation and Treatment to Portions of Exhibit 1 of the February 24, 2021 [SRP] Filing.” (April 23rd Resolution”).

**REQUEST FOR BRIEF EXTENSION OF TIME TO RESPOND TO
RESOLUTION AND ORDER OF APRIL 23, 2021**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On February 24, 2021, LUMA filed before this honorable Puerto Rico Energy Bureau (“Energy Bureau”) a Request for Approval of the System Remediation Plan (“SRP Petition”), pursuant to LUMA’s obligations under Section 4.1 (d) of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement dated as of June 22, 2020, executed by and among LUMA, the Puerto Rico Electric Power Authority (“PREPA”) and the Puerto Rico Public-Private Partnerships Authority (“P3 Authority”) (“OMA”).

2. On even date, LUMA also submitted a *Request to Submit Portions of Section 6 of the System Remediation Plan Confidentially and Memorandum of Law in Support Thereof* (“Request for Confidential Treatment”). LUMA requested confidential designation and treatment of selected portions of Section 6 of the System Remediation Plan (“SRP”) and of portions of appendices D and F to the SRP because they contain sensitive commercial information and trade

secrets protected under Act 80-2011 and Act 122-2019, and Critical Energy Infrastructure Information (“CEII”) under federal law, and pursuant to the Bureau’s policy on Management of Confidential Information.

3. The Bureau adjudicated the Request for Confidential Treatment on April 23, 2021, granting and denying in part LUMA’s Request for Confidential Treatment (“April 23rd Resolution”). LUMA received the April 23rd Resolution at 5:16 pm on Friday, April 23, 2021.

4. This honorable Energy Bureau granted LUMA two days to file unredacted or public versions of the SRP, in accordance with the April 23rd Resolution. Because the April 23rd Resolution was issued on a Friday, LUMA was granted one working day to prepare and file its response in compliance with the April 23rd Resolution.

5. Upon receiving the April 23rd Resolution, LUMA and its undersigned counsel analyzed the same to prepare a response on or before April 26, 2021. LUMA and its counsel worked diligently today to conclude the filing. Despite their best and good-faith efforts to comply within the two-day period, it has not been possible to responsibly complete the filing in response to the April 23rd Resolution within the allotted deadline.

6. It bears noting that during the past days, LUMA has submitted several regulatory filings with this Bureau in several proceedings, including NEPR-MI-2021-0004 (two filings in compliance with Bureau Orders submitted on April 23, 2021 and filing of Generation Budget on April 22, 2021), and the optimization proceeding, Case No. NEPR-MI-2020-0016 (filing of answers to questions on April 21, 2021). LUMA has also been preparing for the upcoming technical conferences scheduled to begin on May 3rd 2021.

7. LUMA respectfully requests a brief one-day extension of time until April 27, 2021, to file its response in compliance with the April 23rd Resolution. This brief extension of time is

necessary for LUMA to responsibly prepare and file its submission in response and in compliance with the April 23rd Resolution.

8. This brief extension of time is sought in good faith without intent to delay proceedings. It is respectfully submitted that the requested extension of one day will not delay proceedings in this case in which the technical conferences are scheduled to commence on May 14, 2021.

WHEREFORE, LUMA respectfully requests that this Honorable Bureau **grant** this brief extension of time of one day, up to and including April 27, 2021, to file its response in compliance with the April 23rd Resolution on the Energy Bureau’s “Determinations on LUMA’s Request Confidential Designation and Treatment to Portions of Exhibit 1 of the February 24, 2021 Filing.”

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of April 2021.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katuska Bolaños-Lugo, kbolanos@diazvaz.law.



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