

opportunities as well as the medium- and long-term progress to Act 17 mandate compliance.

2. Although there are separate proceedings many of such proceedings are in fact highly integrated. This requires a holistic analysis, much more complex and time consuming than totally separated proceedings.

3. To be able to responsibly comment on this matter, ICSE is consulting with U.S. based experts, and making a judicious analysis of the legal implications of these issues.

4. Contrary to LUMA, PREPA and FOMB, as applicable, ICSE does not have unlimited resources in terms of legal support or private professional contractors to analyze this matter on a short time frame.

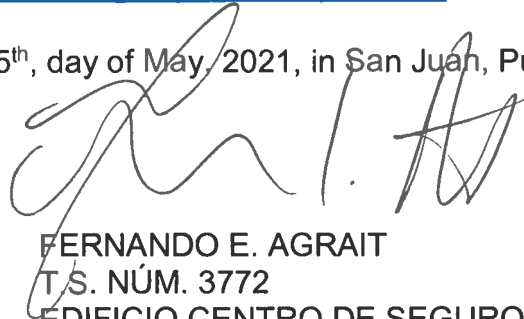
5. It is respectfully requested a short additional time of 14 days to file ICSE's position on these issues.

WHEREFORE, it is respectfully requested the extension of time be approved.

CERTIFICATE OF SERVICE I hereby certify that, on this same date, we have filed this motion to: kbolanos@diazvaz.law, jmarrero@diazvaz.law and margarita.mercado@us.dlapiper.com, Elias.sostre@aes.com, jesus.bolinaga@aes.com, cfl@mcvpr.com; ivc@mcvpr.com; notices@sonnedix.com; leslie@sonnedix.com; victorluisgonzalez@yahoo.com; tax@sunnova.com; jcmendez@reichardescalera.com; r.martinez@fonroche.fr; gonzalo.rodriguez@gestampren.com; kevin.devlin@patternenergy.com; fortiz@reichardescalera.com; jeff.lewis@terraform.com; mperez@prrenewables.com; cotero@landfillpr.com, geoff.biddick@radiangen.com, hjcruz@urielrenewables.com, carlos.reyes@ecoelectrica.com; brent.miller@longroadenergy.com; tracy.deguise@everstreamcapital.com; h.bobea@fonrochepr.com; ramonluisnieves@rlnlegal.com; hrivera@oipc.pr.gov; info@sesapr.org; yan.oquendo@ddec.pr.gov; acarbo@edf.org; pjcleanenergy@gmail.com; nicolas@dexgrid.io; javrua@gmail.com; JavRua@sesapr.org; lmartinez@nrdc.org; thomas.quasius@aptim.com; rtorbert@rmi.org; tjtorres@amscm.com; lionel.orama@upr.edu; noloseus@gmail.com; aconer.pr@gmail.com; dortiz@elpuente.us; wilma.lopez@ddec.pr.gov; gary.holtzer@weil.com; ingridmvila@gmail.com; rstgo2@gmail.com; agc@agcpr.com; presidente@ciapr.org;

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RESPECTFULLY SUBMITTED this 25th, day of May, 2021, in San Juan, Puerto Rico.



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