

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

2021 MAR 25 PM 3: 28

IN RE: REVIEW OF LUMA's TERMS OF SERVICE (LIABILITY WAIVER)	CASE NO. NEPR-MI-2021-0007 SUBJET: <hr/>
---	--

**MOTION REQUESTING EXTENSION OF TIME TO FILE COMMENTS**

TO THE ENERGY BUREAU:

Now comes Instituto de Competitividad y Sostenibilidad Económica de Puerto Rico (ICSE) represented by appearing counsel and respectfully alleges and prays:

1. ICSE requests further time for intervenors, and also for PREPA/LUMA and other stakeholders to comment on specific ongoing proceedings. In particular we refer to LUMA's Terms of Service. ICSE acknowledges - as PREB and LUMA have in this and other proceedings – the integrated nature of the planning, the budgeting, the metrics of immediate remediation and long term grid re-building and modernization progress inherent to various intertwined proceedings. ICSE recognizes the need for LUMA to achieve short term operating success as its broad T&D services contract is implemented in the middle of hurricane season. We understand promptly incorporating these two hi-level operating principles into an integrated approach to Act 17 compliance the various ongoing intertwined proceedings will help guide short term success the “low-hanging fruit” 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.

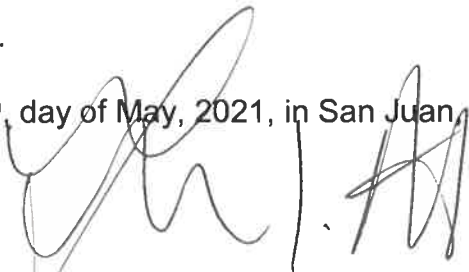
4. Contrary to LUMA, PREPA and FOMB, as applicable, ICSE does not have unlimited resources in terms of legal support or private professional contractors to analyze this matter on a short time frame.

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.

I hereby certify that, on this same date, we have filed this motion to: [kbolanos@diaz.vaz.law](mailto:kbolanos@diaz.vaz.law); [jmarrero@diaz.vaz.law](mailto:jmarrero@diaz.vaz.law), [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), [hrivera@oipc.pr.gov](mailto:hrivera@oipc.pr.gov), [contratistas@oipc.pr.gov](mailto:contratistas@oipc.pr.gov).

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



FERNANDO E. AGRAIT  
T.S. NÚM. 3772  
EDIFICIO CENTRO DE SEGUROS  
701 AVENIDA PONCE DE LEÓN  
OFICINA 414  
SAN JUAN, PUERTO RICO 00907  
TELS 787-725-3390/3391  
FAX 787-724-0353  
EMAIL: [agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com)