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

IN RE: REVIEW INITIAL BUDGETS	OF	LUMA'S	CASE NO. CEPR-MI-2021-0004
			SUBJECT: Urgent Request for Brief Extension of Time to File Presentation for Technical Conference.

URGENT REQUEST FOR BRIEF EXTENSION OF TIME TO FILE LUMA'S PRESENTATION FOR TECHNICAL CONFERENCE

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 April 20, 2021, this honorable Puerto Rico Energy Bureau ("Bureau") issued a

Resolution and Order that sets a procedural calendar in this proceeding ("April 20th Order").

2. Among others, in the April 20th Order this Bureau directed that LUMA file by April

29, 2021, the presentation to be offered during the virtual technical conference scheduled in this proceeding.

3. LUMA has been diligently working on a fulsome Power Point[™] presentation to aid this Energy Bureau in its analysis and approval of the proposed Initial Budgets and that will be a useful resource for the public and interested stakeholders. However, the eight days granted by this honorable Energy Bureau have proven insufficient for LUMA to draft, review and conclude its presentation for the technical conference.

4. It bears noting that during the past eight days LUMA has diligently worked and is simultaneously working on several regulatory filings in proceedings before this Bureau. These include:

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- a. Two motions in compliance with this Bureau's resolutions and orders on LUMA's requests for confidential designations of the Initial Budgets and the responses to requests for information issued by the Bureau on Initial Budgets in the captioned proceeding (both filed on April 23, 2021);
- b. Motion in compliance with this Bureau's resolution and order on LUMA's requests for confidential designations of the System Remediation Plan ("SRP"), submitted in Case No. NEPR-MI-2020-0019 (filed on April 27, 2021);
- Memorandum of Law in Support of Request for Confidential Designations of Responses to Requests for Information issued by the Bureau on the SRP, Case No. NEPR-MI-2020-0019 (filed on April 26, 2021);
- d. Submission of the Puerto Rico Electric Power Authority's Generation Budget in this proceeding (filed on April 22, 2021);
- e. Motion for clarification on LUMA's Initial Budgets and Shared Services submitted in this case (filed on April 26, 2021);
- f. Responses to Questions of Stakeholders in the optimization proceeding, Case
 No. NEPR-MI-2020-0016 (filed on April 21, 2021);
- g. Submission of Summary of Initial Budgets in Spanish (filed on April 28, 2021);
- h. Submission of Summary of System Remediation Plan in Spanish, Case No. NEPR-MI-2020-0019 (filed on April 28, 2021);
- Motion for partial reconsideration of Bureau Resolution and Order issued on April 8, 2021 on PREPA's performance baselines, submitting information on the results of J.D. Power Surveys and requesting clarifications, Case No. NEPR-MI-2019-0007 (filed on April 28, 2021).

5. Additionally, LUMA is working on upcoming filings and preparation for the technical conferences scheduled by this Bureau on LUMA's SRP (Case No. NEPR-MI-2020-0019) and System Operation Principles (Case No. NEPR-MI-2021-001). LUMA is also working collaboratively with PREPA to prepare the answers to questions issued by this Bureau in the Demand Response proceeding, Case No. NEPR-MI-2021-001, to be filed on April 30, 2021.

6. LUMA respectfully requests a brief extension of time until Friday, **April 30, 2021 at 4:00 pm**, to file for the record, the presentation to be offered during the technical conference scheduled in this proceeding.

7. This brief extension of time is sought in good faith without intent to delay proceedings. It is respectfully submitted that the requested extension will serve to ensure that the presentation to be offered by LUMA and its representatives addresses fully the myriad subjects to be discussed and analyzed during the technical conference.

8. LUMA remains committed to comply with the orders issued by this honorable Bureau en route to reaching the goal of commencing operations by June 1st 2021, to deliver safe, reliable, resilient, cost-efficient and customer-centric electric power services in Puerto Rico to benefit public interests and in compliance with energy public policy.

WHEREFORE, LUMA respectfully requests that this Bureau **take notice** of the aforementioned, and **grant** LUMA the requested brief extension of time until April 30, 2021 at 4:00 pm, to file for the public record the presentation to be offered during the technical conference in this proceeding.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th 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 Katiuska Bolaños-Lugo, <u>kbolanos@diazvaz.law</u>.



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/s/ Margarita Mercado Echegaray Margarita Mercado Echegaray RUA NÚM. 16,266 <u>margarita.mercado@us.dlapiper.com</u> Exhibit 1