

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

NEPR Received: Jun 11, 2021 7:41 PM
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IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT:

Urgent Request for Brief Extension of Time to file Request for Clarifications and/or Reconsideration authorized by June 3rd Resolution and Order.

URGENT REQUEST FOR BRIEF EXTENSION OF TIME UNTIL WEDNESDAY JUNE 16, 2021, TO FILE MOTION FOR CLARIFICATIONS AND/OR PARTIAL RECONSIDERATION OF RESOLUTION AND ORDER OF MAY 21, 2021

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, LUMA ENERGY, LLC as Management Co., and **LUMA ENERGY SERVCO, LLC** (collectively, **LUMA**), through the undersigned legal counsel and respectfully state and request the following:

1. On May 21st, 2021 this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order in this proceeding adopting principles for establishing performance metric benchmarks; establishing four categories of performance metrics applicable to the Puerto Rico Electric Power Authority (PREPA); and setting initial benchmark values for several metrics that are subject to reporting requirements, among others (“May 21st Resolution and Order”). *See* May 21st Resolution and Order at pages 3-14.
2. On June 3, 2021, this honorable Energy Bureau directed that LUMA would have until June 11, 2021, to file a request for clarification or reconsideration of the May 21st Resolution and Order. *See* Resolution and Order of June 3, 2021.

3. LUMA hereby respectfully requests three additional business day, until June 16, 2021, to file a request for clarification or reconsideration of the May 21st Resolution and Order.
4. This urgent request for additional time is necessary for LUMA to be able to complete analysis on data and information obtained as recently as today, that will be included in its request for clarification and comments of the May 21st Resolution and Order.
5. LUMA personnel have been working diligently to finalize its request for clarification or reconsideration of the May 21st Resolution and Order and several comments and analysis on the baselines set by the Bureau in Attachments A and B to the May 21st Resolution and Order and its recommendations and comments on the peer group utilities chosen by the Bureau and the benchmarks set in Attachment A to the May 21st Resolution and Order.
6. Unfortunately, LUMA will not be able to conclude its analysis and comments by today, since within the last forty-eight (48) hours LUMA has been managing two major incidents, which have resulted in additional work and disrupted working conditions. These unanticipated incidents have delayed efforts to conclude this filing and prevent LUMA to responsibly complete the planned submission.
7. LUMA respectfully submits that as of the close of business day yesterday, it understood in good faith that it would be able to meet today's deadline. It was not until this afternoon, that the LUMA team reached the conclusion that given the new data received today, the continued actions required due to the incidents and disruptions, it would not be feasible to complete the filing of the request for clarification or reconsideration of the May 21st Resolution and Order. Thus, it was not possible to file this urgent request for extension at an earlier date or time.

8. LUMA is cognizant of the importance of granting the Bureau time to consider requests for extension of time such as this. And LUMA intends to comply with the Bureau's directives to file requests for extensions of time in reasonable anticipation of the relevant deadline. As stated above, with regards to the request for clarifications or reconsideration of the May 21st Resolution and Order, LUMA intended to present the filing today and was not envisioning an extension until close of business today. This request is based on recent developments and circumstances that ensued last night and today that prevent LUMA from filing within the original deadline.
9. LUMA respectfully requests a brief extension of three business days, until June 16, 2021, to file the request for clarifications or reconsideration of the May 21st Resolution and Order.

WHEREFORE, LUMA respectfully requests this Honorable Bureau **entertain and grant** this urgent request for extension of time, and **grant** LUMA until June 16, 2021 to file a request for clarifications or reconsideration of the May 21st Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of June 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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