

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

NEPR

Received:

Jul 20, 2021

3:22 PM

IN RE: THE IMPLEMENTATION OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY INTEGRATED RESOURCE
PLAN AND MODIFIED ACTION PLAN

CASE NO.: NEPR-MI-2020-0012

SUBJECT: Motion to Inform and Request for
Extension of Time

MOTION TO INFORM AND REQUEST FOR EXTENSION OF TIME

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority, through its counsel of record and respectfully submits and prays follows:

1. On June 24, 2021, the Honorable Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau” or “Bureau”) entered a Resolution and Order (the “June 24 Order”) through which it ordered the Puerto Rico Electric Power Authority (PREPA) to attend a Technical Conference on July 6, 2021, at 1:30 pm. During the Technical Conference, PREPA presented the revised and Updated Procurement Plan that had been submitted to the Energy Bureau on June 15, 2021. *See Motion to Submit Updated Procurement Plan Addressing Plans for the Second Renewable Generation and Energy Storage Procurement Tranche*. Also, during the Technical Conference LUMA Energy Servco, LLC (LUMA, and together with PREPA, the “Parties”) informed the Energy Bureau that it would send proposed revisions and comments to the Updated Procurement Plan to PREPA and that a revised version of the Updated Procurement Plan would be submitted for the consideration and approval of the Energy Bureau within the next two (2) weeks. The two (2) weeks term expires today, July 20, 2021.

2. As the Parties advanced to the Energy Bureau, PREPA received from LUMA comments and proposed revisions to the draft Updated Procurement Plan. PREPA reviewed and commented

the revisions sent by LUMA and forwarded the draft Updated Procurement Plan reflecting those comments this morning.

3. PREPA understands that any outstanding proposed changes and comment can be addressed by the Parties within the next two (2) business days. This additional time will afford the Parties a reasonable period to engage in any further conversations deemed necessary to address any issue that will ultimately result in a more comprehensive and acceptable plan for the consideration and approval of the Energy Bureau. Therefore, PREPA respectfully requests the Energy Bureau to grant an extension of two (2) days to submit the revised Updated Procurement Plan draft.

4. PREPA submits that the request of time herein made, for a short extension, is made in good faith, for the benefit of the objectives being pursued in this matter and that the same will not prejudice any other party to the captioned matter.

WHEREFORE, PREPA respectfully requests that the Honorable Energy Bureau (i) note the above mentioned and (ii) grant an extension of two (2) additional days to file the revised draft Updated Procurement Plan.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 20th day of July 2021.

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CERTIFICATE OF SERVICE

It is hereby certified that, on this same date, I have filed the above motion with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and a courtesy copy of the filing was sent to LUMA through its legal representatives at margarita.mercado@us.dlapiper.com and laura.rozas@us.dlapiper.com.

In San Juan, Puerto Rico, this 20th day of July 2021.

s/ Katuska Bolaños-Lugo

Katuska Bolaños-Lugo