

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

NEPR
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IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN — DECEMBER 2020	CASE NO.: NEPR-MI-2021-0002 SUBJECT: Request for Continuance of Technical Conference
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MOTION FOR CONTINUANCE OF 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 the “Operator” or “LUMA”), and respectfully state and request the following:

1. On August 20, 2021, the honorable Energy Bureau (“Energy Bureau”) issued a Resolution and Order through which it approved several Transmission and Distribution (“T&D”) projects presented by LUMA that are to be submitted for federal funding approval to the Federal Emergency Management Agency (“FEMA”) and the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (“COR3”).

2. On August 30, 2021, LUMA filed a *Motion Requesting Clarification of a Portion of the Energy Bureau’s Resolution and Order Entered on August 20, 2021, and Submitting Updated List of Transmission and Distribution Projects and Twenty-Nine Scopes of Work* (“August 30 Motion”). LUMA stated that it completed the planning phase and project definition for twenty-nine (29) projects to be submitted to FEMA and COR3. Specifically, it detailed the twenty-nine (29) Scopes of Work (“SOW”) for T&D projects for the Energy Bureau’s review and

approval. The SOW comprises projects related to Transmission, Distribution, IT/Telecom, and Buildings.

3. On September 22, 2021, this Energy Bureau issued a Resolution and Order in which it approved the projects therein described, which shall be presented to FEMA and COR3 to finalize its approval process (“September 22th Order”). This Energy Bureau also determined that it was necessary to gather additional information regarding the SOWs submitted through the August 30 Motion for projects under the buildings category before the evaluation could be completed. Therefore, it instructed LUMA to attend a Technical Conference scheduled for September 30, 2021, at 1:00 p.m. LUMA personnel should be prepared to explain: (i) the work to be performed under the SOWs related to the buildings category presented as part of the August 30 Motion; (ii) the necessity of such work to provide reliability to the electric system; and (iii) the differences between the cost estimate presented in June 2021 and the cost estimate presented as part of the August 30 Motion.

4. LUMA designated two witnesses that will attend the Technical Conference to provide the explanations sought by this Energy Bureau. They have a vast knowledge of the topics mentioned above and are the ideal persons to testify to comply with the Energy Bureau’s September 22th Order. However, due to previously scheduled professional commitments that cannot be postponed at this time, both LUMA witnesses cannot participate in the Technical Conference next Thursday, September 30, 2021.

5. In view of the foregoing, LUMA respectfully requests that this Energy Bureau continue the Technical Conference scheduled for September 30, 2021. The undersigned has informed counsel for PREPA that it would file a motion for continuance.

6. LUMA hereby informs that its witnesses are available to attend the Technical Conference on the following dates at times during the week of October 4 to 8, 2021: Monday, October 4th at 8 a.m.; Wednesday, October 6th at 1 p.m.; or Thursday, October 7th at 2 p.m. LUMA requests that the Technical Conference be scheduled preferably on October 4th at 8 a.m., or in the alternative, on any of the dates and times proposed above.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **order** the continuance of the Technical Conference scheduled for September 30, 2021, and **schedule** the Technical Conference for October 4th at 8 a.m., or in the alternative, for any of the remaining dates and times offered in paragraph 6 of this Motion, within the Energy Bureau's discretion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of September 2021.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this **Motion to the attorneys for PREPA**, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.



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