

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

NEPR

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IN RE: PERFORMANCE METRICS
TARGETS FOR LUMA ENERGY SERVCO,
LLC

CASE NO. NEPR-AP-2020-0025

SUBJECT: LUMA'S SEPTEMBER 2nd
MOTION

**Response to LUMA's September 2nd Motion Requesting a Brief Extension
Period For LUMA to Answer LECO's First Discovery**

Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc. - Enlace Latino de Acción Climática, Inc., Alianza Comunitaria Ambientalista del Sureste, Inc., Coalición de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., CAMBIO, Sierra Club and its Puerto Rico chapter, and Unión de Trabajadores de la Industria Eléctrica y Riego (Local Environmental and Civil Organizations, or "LECO"), by and through their legal counsel, hereby submit this response to LUMA's motion of September 2nd.

Through the Motion Requesting a Brief Extension for LUMA to Answer LECO's First Discovery Request, LUMA asked the Energy Bureau an extension of three business days (from September 7th to September 10th) to submit its responses or objections, if any to LECO's first set of discovery request.

If the Energy Bureau grants LUMA's request for a three-day extension of time to answer LECO's first discovery request, LECO requests that the end of the discovery period also be extended by three days, from September 27th to September 30th. The extension is justified because PREB has already shortened the discovery period from the regulatory

standard of sixty days to thirty days¹, and the procedural schedule allows no discovery at all on LUMA's rebuttal testimony. Any further shortening of intervenors' discovery time would unduly harm intervenors' ability to act as informed participants in this proceeding.

LECO served its Second Set of Information Requests to LUMA today, September 3rd. Responses are due September 13th. If LUMA wishes to seek an extension of that timeframe, or any other issues arise, LECO offers that LUMA could attempt to resolve these issues by contacting LECO's counsel directly rather than through motion practice, to conserve the resources of PREB.

Respectfully submitted,

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¹ In accordance with PREB's authority under Regulation 8543 Section 8.01(J).

CERTIFICATION OF SERVICE

I hereby certify that on September 3, 2021, I have caused this Response to be served electronically upon the following parties:

- Puerto Rico Energy Bureau: secretaria@energia.pr.gov
- LUMA Energy LLC and LUMA Energy ServCo LLC: mmercado@mercado-echegaray-law.com; margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com
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