

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

NEPR

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IN RE: PERFORMANCE TARGETS FOR
LUMA ENERGY SERVCO, LLC

CASE NO.: NEPR-AP-2020-0025

SUBJECT: MOTION FOR
RECONSIDERATION

**MOTION FOR RECONSIDERATION OF THE DENIAL OF RAGHU MURTHY'S
NOTICE OF APPEARANCE**

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW, 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, and Sierra Club and its Puerto Rico chapter, and Unión de Trabajadores de la Industria Eléctrica y Riego (collectively, "LECO"), and respectfully state and request the following:

1. On February 25, 2022, the Energy Bureau issued an Order denying the *Notice of Appearance and Request for Notice* filed on November 11, 2021, by Raghu Murthy stating that counsel was not admitted to practice law in Puerto Rico and that the administrative record did not contain documentation proving that counsel Murthy was granted leave by the Puerto Rico Supreme Court to appear *pro hac vice*.
2. On October 15, 2021, prior to counsel Murthy's filing of the Notice of Appearance, the Puerto Rico Supreme Court granted counsel Murthy's

request for leave to appear *pro hac vice* in this case. *See* attached Resolution.

3. By inadvertence, the resolution of the Puerto Rico Supreme Court was omitted from counsel Murthy's original Notice of Appearance request.
4. In good faith, counsels provide the Energy Bureau with the aforementioned resolution by the Puerto Rico Supreme Court and respectfully request that the Energy Bureau reconsider and grant counsel Murthy's Notice of Appearance.

WHEREFORE, LECO respectfully requests for the Energy Bureau to reconsider the February 25 Order denying Mr. Murthy's Notice of Appearance in light of the resolution by the Puerto Rico Supreme Court and grant counsel Raghu Murthy leave to appear *pro hac vice*.

Respectfully submitted. In San Juan Puerto Rico, February 25, 2022.

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CERTIFICATION OF SERVICE

I hereby certify that on February 25, 2022, I served this Motion for Reconsideration to the following parties:

- Puerto Rico Energy Bureau: secretaria@energia.pr.gov; secretaria@jrsp.pr.gov; legal@jrsp.pr.gov and atorres@jrsp.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; and ana.rodriguezrivera@us.dlapiper.com
- PREPA: jmarrero@diazvaz.law; kbolanos@diazvaz.law
- Oficina Independiente de Protección al Consumidor (OIPC): contratistas@oipc.pr.gov; hrivera@oipc.pr.gov
- Instituto de Competitividad y Sostenibilidad Económica de Puerto Rico (ICSE): agraitfe@agraitlawpr.com
- Colegio de Ingenieros y Agrimensores de Puerto Rico (CIAPR): rhoncat@netscape.net

/s/ Raghu Murthy

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EN EL TRIBUNAL SUPREMO DE PUERTO RICO

Ex parte:

Raghava Murthy

MC-2021-0103

RESOLUCIÓN

En San Juan, Puerto Rico, a 15 de octubre de 2021.

Examinada la *Declaración de causa justa para la exención del pago para la admisión por cortesía de Raghava Murthy*, así como la *Solicitud de admisión por cortesía* presentadas el 4 de octubre de 2021 por la parte peticionaria, se provee **ha lugar** a ambos petitorios. Por consiguiente, se admite al abogado Raghava Murthy para postular ante el Negociado de Energía de Puerto Rico en el caso *In re: Performance Targets for LUMA Energy Servo, LLC*, Núm. NEPR-AP-2020-0025.

Lo acordó el Tribunal y certifica el Secretario del Tribunal Supremo. La Jueza Asociada señora Pabón Charneco no intervino.



Javier O. Sepúlveda Rodríguez
Secretario del Tribunal Supremo

