

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

NEPR

Received:

May 3, 2022

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

CASE NO. NEPR-AP-2020-0025

**SUBJECT: LUMA's Urgent Request for
an Additional Extension of Time to File
Rebuttal Testimony of Witness Lee Wood**

**LUMA'S URGENT REQUEST FOR AN ADDITIONAL EXTENSION OF TIME
TO FILE REBUTTAL TESTIMONY OF WITNESS LEE WOOD**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME now **LUMA Energy, LLC** ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo") (jointly "LUMA"), and respectfully states and request the following:

1. On April 27, 2022, LUMA filed a *LUMA Witnesses' Supplemental Rebuttal Testimonies and Urgent Request for an Extension of Time to File Rebuttal Testimony of Witness Lee Wood* (the "Urgent Request") wherein LUMA submitted its witnesses' supplemental testimonies on the additional metrics to be evaluated by this Honorable Puerto Rico Energy Bureau ("Energy Bureau"). Therein, LUMA also informed that Mr. Lee Wood, Director of Business Transformation for LUMA, had an unexpected family emergency outside the jurisdiction of Puerto Rico that made it unattainable for him to finalize his testimony by the due date. Consequently, LUMA requested an extension up to May 4, 2022, to file Mr. Wood's rebuttal testimony.

2. It is respectfully informed that Mr. Wood continues to attend to the family emergency informed through the Urgent Request, which requires his presence outside of the jurisdiction of Puerto Rico. As a result of the aforementioned unexpected circumstances, Mr.

Wood has been genuinely impeded from completing his rebuttal testimony for LUMA to be in a position to file it by tomorrow.

3. In light of the foregoing, LUMA respectfully requests an additional brief extension of time, until May 11, 2022, to file Mr. Wood's rebuttal testimony. The extension request is made in good faith and does not intend to cause undue delay in the proceeding. LUMA reiterates its belief that Mr. Wood's delicate situation is sufficient just cause for this Energy Bureau to grant the extension requested.

WHEREFORE, LUMA respectfully requests that this Energy Bureau **take** notice of the above and **extend** the deadline for LUMA to submit the rebuttal testimony of witness Lee Wood until May 11, 2022.

RESPECTFULLY SUBMITTED.

We hereby certify that we 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, the Office of the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov, and counsel for the Puerto Rico Institute for Competitiveness and Sustainable Economy ("ICSE"), Fernando Agrait, agraitfe@agraitlawpr.com, counsel for the Colegio de Ingenieros y Agrimensores de Puerto Rico ("CIAPR"), Rhonda Castillo, rhoncat@netscape.net, and counsels for Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc., Enlace Latino de Acción Climática, 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 (jointly, Puerto Rico Local and Environmental Organizations), larroyo@earthjustice.org, lvez@earthjustice.org, rmurthy@earthjustice.org, rstgo2@gmail.com, notificaciones@bufete-emmanuelli.com, pedrosaade5@gmail.com, jessica@bufete-emmanuelli.com; rolando@bufete-emmanuelli.com.

In San Juan, Puerto Rico, this 3rd day of May 2022.



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