

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

NEPR

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CASE NO. NEPR-MI-2021-0004

IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

SUBJECT: Motion to Clarify Paragraph 22 of LUMA's
*Motion Submitting First Set of Responses to Requests for
Information Issued During December 20, 2022 Closed
Conference and Request for Confidential Treatment*
dated December 28, 2022

**MOTION TO CLARIFY PARAGRAPH 22 OF LUMA'S *MOTION SUBMITTING FIRST
SET OF RESPONSES TO REQUESTS FOR INFORMATION ISSUED DURING
DECEMBER 20, 2022 CLOSED CONFERENCE AND REQUEST FOR CONFIDENTIAL
TREATMENT DATED DECEMBER 28, 2022***

TO THE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC (jointly
"LUMA"), through the undersigned legal counsel, and respectfully submit the following:

1. On December 28, 2022, LUMA filed a *Motion Submitting First Set of Responses to Requests for Information Issued During the December 20, 2022 Closed Conference and Request for Confidential Treatment* along with a first set of confidential responses to four (4) of the requests for information issued by the Energy Bureau during the closed Technical Conference held on December 20, 2022. LUMA also requested that the Energy Bureau grant a brief extension of time to submit its responses to the remaining requests issued during the December 20th closed Technical Conference.

2. On paragraph 22 of the December 28th Motion, LUMA incorrectly stated that it would need until January 10, 2023 to submit its responses to the six (6) remaining requests for information issued during the December 20th closed conference. As explained in the same paragraph, the additional brief time is needed to allow some of its key personnel to return to work after their previously scheduled vacation period. Further on at paragraph 22, LUMA stated that such

personnel would return to work on January 11, 2023. Consequently, at the motion's prayer, LUMA requested the Honorable Energy Bureau to grant it until January 11, 2023, to submit the remaining responses to the December 20th RFIs.

3. LUMA respectfully clarifies paragraph 22 of the December 28th Motion insofar as it incorrectly states that the requested extension is until January 10 when it should read January 11, 2023.

4. This clarification, as well as the request for extension, are made in good faith to ensure the integrity of the record and to put LUMA in position to comply with this Energy Bureau's December 20th RFIs.

WHEREFORE, LUMA respectfully requests the Energy Bureau to **take notice** of the above for all purposes and **grant** a brief extension of time, until January 11, 2023, for LUMA to file its responses to the December 20th remaining requests.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of January 2023.

We hereby certify that we filed this motion using the electronic filing system of this Puerto Rico Energy Bureau and that copy of this motion was notified to PREPA counsel mvazquez@diazvaz.law and kbolanos@diazvaz.law.



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