

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

NEPR

Received:

Jun 7, 2023

10:47 PM

IN RE:

REVIEW OF LUMA'S INITIAL BUDGET

CASE NO.: NEPR-MI-2021-0004

SUBJECT: Urgent Request for Brief Extension of Time to Submit Response in Compliance with Resolution and Order of May 31, 2023.

**URGENT REQUEST FOR BRIEF EXTENSION OF TIME TO SUBMIT RESPONSE IN
COMPLIANCE WITH RESOLUTION AND ORDER OF MAY 31, 2023**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR, LLC ("Genera PR"), through its counsel of record, and respectfully state and request the following:

1. On May 16, 2023, LUMA Energy, LLC, and LUMA Energy ServCo, LLC (collectively, "LUMA") filed a document titled *Submission of Consolidated Annual Budgets for Fiscal Year 2024 and Proposed Annual T&D Projections Through Fiscal Year 2026*, in which, LUMA submitted to the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") the proposed T&D Budgets developed by LUMA, **the proposed GenCo Budgets developed by Genera PR**, and the proposed HydroCo and HoldCo Budgets developed by the Puerto Rico Electric Power Authority ("PREPA").

2. On May 23, 2023, this Energy Bureau issued a Resolution and Order with the subject *Second Requirement of Information ("ROI") - Review of LUMA's Proposed Consolidated FY2024 Budgets*. ("May 23 Order"). In its pertinent part, this Energy Bureau ordered LUMA, Genera PR, and PREPA to respond, on or before June 2, 2023, to a Second Requirement of Information ("ROI") set forth in Attachment A and Attachment B to the May 23 Order.

3. Demonstrating its commitment to comply with the May 23 Order, Genera PR worked relentlessly, as evidenced through *its Motion Submitting Responses to ROIs in Compliance with May 23 Order* filed on June 2, 2023, and *Motion Submitting Supplemental Responses to the Request for Information in Compliance with May 23 Order* on June 6, 2023.

4. On May 31, 2023, the Energy Bureau entered a Resolution and Order titled “*Third Requirement of Information (“ROI”) – Review of LUMA’s Proposed Consolidated FY 2024 Budgets: GENERA’s Necessary Maintenance Expenses (“NME”)*” (“May 31 Order”) whereby it ordered Genera PR to respond, or before June 7, 2023 at 12:00 p.m., to a third ROI set forth in Attachment A to the May 31 Order.

5. On June 7, 2023, Genera PR filed a *Motion Submitting Responses to Request for Information in Compliance with May 31 Order*; whereby it submitted responses to the ROI in accordance with the May 31 Order.

6. Despite the concerted efforts, Genera PR requires additional time to ensure that the ROI response is comprehensive and accurate. Specifically, this pertains to the outstanding responses for items 18 and 28 related to the NME projects, as well as items 12, 42, and 44 pertaining to the additional NME projects.

7. Genera PR asserts to this Honorable Energy Bureau that the motive behind this request is solely to ensure the thoroughness and accuracy of the response and is not an attempt at delay. Genera PR has been, and remains, committed to working diligently to fulfill all aspects of the ROI.

8. In consideration of the aforementioned, Genera PR respectfully requests an extension for submitting the remaining responses to the ROI as per the May 31 Order, until 6:00 PM on June 8, 2023.

WHEREFORE, Genera PR respectfully requests that the Energy Bureau **take notice** of the above and **grant** an extension until 6:00 PM on June 8, 2023, for the submission of the outstanding responses pertinent to the ROI, thereby ensuring compliance with the May 31 Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 7th day of June 2023.

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CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to Joannely Marrero-Cruz, at jmarrero@diazvaz.law; Maralíz Vázquez-Marrero, at mvazquez@diazvaz.law; Margarita Mercado Echegaray, at margarita.mercado@us.dlapiper.com; and Ana Margarita Rodríguez Rivera, at ana.rodriguezrivera@us.dlapiper.com.

In San Juan, Puerto Rico, this 7th day of June 2023

s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez