

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

NEPR

Received:

Jun 7, 2023

9:32 AM

IN RE:

REVIEW OF LUMA'S INITIAL BUDGET

CASE NO.: NEPR-MI-2021-0004

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

**URGENT REQUEST FOR 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 18, 2023, the Energy Bureau entered a Resolution and Order, directing PREPA and Genera to provide, through LUMA, the proposed budgets and supporting information that reflect the LUMA Budget Request in Schedule 3.1 “Annual Budget Summary”.

3. 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.

4. 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.

5. 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 the ROI set forth in Attachment A to the May 31 Order.

6. Following the May 23 Order and the May 31 Order, Genera PR has dedicated significant resources to compile the necessary supporting data, ensuring full compliance with the Energy Bureau's ROI.

7. However, due to the complexity of the information requested in the May 31 Order, Genera PR requires additional time to ensure a comprehensive and accurate response to the ROIs.

8. Genera PR assures the Energy Bureau that this request is not intended for delay but rather to ensure the completeness and accuracy of the response. Genera PR has worked, and continues to work, diligently to satisfy all aspects of the ROIs.

9. In light of the above, Genera PR respectfully requests an extension for the deadline of the May 31 Order, until the end of the calendar day of June 7, 2023 (12:00 AM).

WHEREFORE, Genera PR respectfully requests that the Energy Bureau **take notice** of the above and **grants** Genera PR until end of the natural day, at 12:00 a.m. of June 7, 2023, to comply 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