

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

NEPR

Received:

Jun 8, 2023

12:00 AM

IN RE:

PUERTO RICO ELECTRIC POWER
AUTHORITY'S EMERGENCY
RESPONSE PLAN

CASE NO.: NEPR-MI-2019-0006

SUBJECT: Urgent Request for Brief
Extension of Time to Submit Genera PR
Emergency Response Plan

**URGENT REQUEST FOR BRIEF EXTENSION OF TIME TO SUBMIT
GENERA PR LLC EMERGENCY RESPONSE PLAN**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera PR"), through the undersigned legal counsel, and respectfully state and request the following:

I. Legal Basis to Submit an Emergency Response Plan

1. On June 1, 2023, Genera PR submitted its Emergency Response & Action Plan to the Energy Bureau via email In compliance with Section 4.2(e) the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("OMA") entered into by Genera PR, the Puerto Rico Electric Power Authority ("PREPA"), and the Puerto Rico Public-Private Partnership Authority ("P3A") on January 24, 2023.

2. Nevertheless, on June 6, 2023, this Honorable Energy Bureau, exercising its regulatory powers, issued a Resolution and Order titled "Filing of Initial Genera PR Legacy Generation Emergency Response Plan." This Order required Genera PR to submit the above-mentioned Emergency Response & Action Plan to the official docket that has been established for the purpose of collecting emergency plans regarding the electric system.

3. Genera PR wishes to inform this Honorable Energy Bureau that it is currently undergoing a careful examination of certain confidential components contained within the Emergency Response Plan and is evaluating whether disclosing such elements at this time serves the best interest and welfare of the populace of Puerto Rico.

4. In view of the foregoing circumstances and considerations, Genera PR earnestly requests this Honorable Energy Bureau to consider granting a brief extension of time, specifically until the close of the business day on June 8, 2023, for the submission of the Emergency Response & Action Plan to the appointed docket.

WHEREFORE, Genera PR respectfully requests that this Honorable Energy Bureau **grant** the requested extension of time for the submission of the Emergency Response & Action Plan until June 8, 2023.

RESPECTFULLY SUBMITTED.

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

ECIJA SBGB
PO Box 363068
San Juan, Puerto Rico 00920
Tel. (787) 300.3200
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo
jfr@sbgblaw.com
TSPR 9,669

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez
alopez@sbgblaw.com
TSPR 22,996

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; Laura T. Rozas, at laura.rozas@us.dlapiper.com; Ana Margarita Rodríguez Rivera, at ana.rodriguezrivera@us.dlapiper.com; and Yahaira De la Rosa Algarín, at yahaira.delarosa@us.dlapiper.com

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

s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez