

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

NEPR

Received:

Jun 14, 2023

9:10 PM

IN RE: REVIEW OF LUMA’S INITIAL BUDGETS

CASE NO.: NEPR-MI-2021-0004

SUBJECT: Motion to Submit the Puerto Rico Electric Power Authority’s Updated Employee Roster in Compliance with the June 9 2023 Bench Order

**MOTION TO SUBMIT THE PUERTO RICO ELECTRIC
POWER AUTHORITY’S UPDATED EMPLOYEE ROSTER
IN COMPLIANCE WITH THE JUNE 9 2023 BENCH ORDER**

COMES NOW the Puerto Rico Electric Power Authority (“PREPA”), through its counsel of record, and respectfully submits and requests as follows:

1. On May 3, 2023, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau” or “PREB”) issued a procedural calendar to be followed during the case of caption, Thereafter, on May 8, 2023, the procedural calendar was modified whereby the Virtual Technical Conference was scheduled for last Friday, June 9, 2023, to discuss the FY2024 Budget Proposal for the Puerto Rico Energy System.
2. The FY2024 Budget Proposal is comprised of the proposed budget for the Transmission and Distribution System ("Proposed T&D Budgets"), developed by LUMA¹; the budget proposal for the legacy thermal generation units (the "Proposed GenCo Budget"), developed by Genera PR LLC (“Genera”); PREPA’s budget proposal for the hydroelectric generating units and the public irrigation facilities² (the "Proposed HydroCo Budget"), and the budget proposal for PREPA’s subsidiaries other than GenCo and HydroCo (the, "Proposed HoldCo Budget").

¹ Luma Energy LLC and Luma Energy ServCo (“LUMA”).

²Hydroelectric generating units and the public irrigation facilities (“Hydroelectric Assets”)

3. As part of PREPA's submissions for the proposed HydroCo and HoldCo budgets as well as responses to PREB's requests of information, on June 7, 2023, PREPA submitted a document titled *Request to Substitute Exhibit 2 to Annex A of PREPA's June 6, 2023, Motion in Compliance with the May 23, 2023 Order* and included as Exhibit 2 a document titled Roster FY23-24 Revised (the "Employee Roster").

4. The Employee Roster included a list of 375 positions to be distributed between, HoldCo, Property Co, Retirement, Finance, Legal, IT-OT, Human Resources, Asset Management and Regulation, Executive and Governing Board, as well as the employee positions for the Hydroelectric, Irrigation and Water Administration divisions for HydroCo.

5. Notwithstanding, during the June 9, 2023, Virtual Technical Conference, PREPA's Executive Director expressed that on that same date, PREPA's Governing Board had an extraordinary meeting and determined the total number of employees that would remain in PREPA following the utility's reorganization starting in FY2024 would be 255 employees.

6. Considering the above, PREPA requested from the Energy Bureau until today June 14, 2023, to present the final Employee Roster, in accordance with the Governing Board's mandate. Further, the Energy Bureau granted PREPA's request to inform and ordered the submittal of the updated Employee Roster as the first bench order of the June 9 Technical Conference ("June 9 Bench Order").

7. In compliance with the June 9 Bench Order, PREPA herein submits to the Energy Bureau the FY2024 HoldCo and HydroCo proposed budget workbooks with the updated Employee Roster. *See*, Exhibit A and B. These also include additional tables in the summary pages with detail on Non-Labor and NME to facilitate the Energy Bureau's review.

WHEREFORE, PREPA respectfully requests the Energy Bureau to take notice of the

aforementioned, find PREPA in compliance with the June 9 2023 Bench Order and **ACCEPT**
Exhibits A and B.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of June 2023.

/s Maralíz Vázquez-Marrero

Maralíz Vázquez-Marrero

TSPR 16,187

mvazquez@diazvaz.law

/s Joannely Marrero-Cruz

Joannely Marrero Cruz

jmarrero@diazvaz.law

TSPR 20,014

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.

290 Jesús T. Piñero Ave.

Oriental Tower, Suite 803

San Juan, PR 00918

Tel.: (787) 395-7133

Fax. (787) 497-9664

CERTIFICATE OF SERVICE

It is hereby certified that, on this same date, I have filed the above motion with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and a courtesy copy of the filing was sent to LUMA through its legal representatives at margarita.mercado@us.dlapiper.com and ana.rodriguezrivera@us.dlapiper.com and to Genera-PR, LLC through its legal representatives jfr@sbgblaw.com; alopez@sbgblaw.com; legal@genera-pr.com; regulatory@genera-pr.com.

In San Juan, Puerto Rico, this 14th day of June 2023.

/s Joannely Marrero-Cruz
Joannely Marrero Cruz

Exhibit A
PREPA HoldCo FY2024 Budget

[Native file submitted to the Energy Bureau]

Exhibit B

PREPA HydroCo FY2024 Budget

[Native file submitted to the Energy Bureau]