

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

NEPR

Received:

Sep 1, 2023

6:24 PM

IN RE:

GENERA PR LLC FUEL OPTIMIZATION
PLAN

CASE NO.: NEPR-MI-2023-0004

SUBJECT: Urgent Request for Extension of
Time to Submit Revised Fuel Optimization Plan
in Compliance with Resolution and Order dated
July 18, 2023

**URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT REVISED FUEL
OPTIMIZATION PLAN IN COMPLIANCE WITH RESOLUTION AND ORDER
DATED JULY 18, 2023**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR, LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On July 18, 2023, the Energy Bureau issued a Resolution and Order titled *Commencing Procedure to Evaluate Genera PR LLC Fuel Optimization Plan* (“July 18th Order”), whereby, among other things, the Energy Bureau commenced Case No.: NEPR-MI-2023-0004 to review the Fuel Optimization Plan required by the LGA OMA and ordered Genera to file a final version, including a public version, of the Fuel Optimization Plan agreed upon with P3 Authority not later than August 15, 2023.

2. On August 14, 2023, Genera filed a document titled *Request for Extension of Time to Submit Fuel Optimization Plan in Compliance with Resolution and Order dated July 18, 2023*

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority (“P3 Authority”), Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

(August 14th Motion) whereby Genera requested an extension of time of twenty (20) days, until September 4, 2023, to submit the finalized Fuel Optimization Plan.

3. Since the issuance of the July 18th Order, and the filing of the August 14th Motion, Genera has diligently engaged with the P3 Authority in a series of proactive actions designed to comply with and implement the directives set forth in the July 18th Order. After multiple discussions, the revised Fuel Optimization Plan was submitted to the P3 Authority on August 30, 2023.

4. Today, on September 1, 2023, P3 Authority and Genera convened to further discuss the revised Fuel Optimization Plan.

5. Subsequent to such discussion, Genera respectfully informs the Energy Bureau that it will require additional time to present a newly revised Fuel Optimization Plan to the P3 Authority incorporating the comments discussed during today's meeting and a further additional time for the P3 Authority to review and approve it.

6. In consideration of the efforts outlined above, and the additional steps required to finalize the review process of the Fuel Optimization Plan with the P3 Authority, Genera respectfully requests an extension of time until **September 15, 2023**, to submit the finalized Fuel Optimization Plan. Genera further assures the Energy Bureau that this extension is sought in good faith and is exclusively intended to provide Genera with the requisite time to fully comply with the mandates of the July 18th Order pertaining to the Fuel Optimization Plan.

WHEREFORE, Genera respectfully requests that this Honorable Energy Bureau **take notice** of the above for all purposes and **grant** Genera an extension of time until September 15, 2023, to comply with the July 18th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of September 2023.

ECIJA SBGB

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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.

In San Juan, Puerto Rico, this 1st day of September 2023

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez