

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

NEPR
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IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

**SUBJECT: Revised FCA and PPCA
Reconciliations and Revised Calculated, FCA,
PPCA, and FOS Calculated Factors, and
Request for Confidential Treatment**

**MOTION SUBMITTING REVISED FCA AND PPCA RECONCILIATIONS FOR JULY
AND AUGUST 2023 AND REVISED SUBMISSION OF FCA, PPCA AND FOS
CALCULATED FACTORS, AND REQUEST FOR CONFIDENTIAL TREATMENT**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and LUMA Energy Servco, LLC (“ServCo”) (jointly referred to as the “Operator” or “LUMA”), through the undersigned counsel, and respectfully state and request the following:

I. Introduction and Background

On July 31, 2023, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order with the subject *Determinación sobre los factores de las Cláusulas de Ajuste Trimestral para el período de agosto a septiembre de 2023*, whereby, among others, it ordered LUMA to submit, on or before September 15, 2023, at noon, the proposed Fuel Charge Adjustment (FCA), Purchased Power Charge Adjustment (PPCA), and Fuel Oil Subsidy (FOS) factors to be implemented from October 1, 2023, to December 31, 2023, and the proposed FCA and PPCA reconciliations for July and August 2023 (“July 31st Order”).

On September 12, 2023, LUMA filed an *Urgent Request for Extension of Time to Submit Quarterly Reconciliations and FCA, PPCA, and FOS Calculated Factors*, whereby it requested a brief extension of time, until September 18, 2023, to inform the Energy Bureau of the quarterly

reconciliations and proposed FCA, PPCA and FOS calculated factors to be in effect from October 1, 2023, through December 31, 2023. This Energy Bureau granted LUMA's Urgent Request through Resolution and Order issued on September 13, 2023.

On September 15, 2023, LUMA filed an *Urgent Request for Brief Additional Extension of Time to Submit Quarterly Reconciliations and FCA, PPCA, and FOS Calculated Factors*, whereby it requested until September 20, 2023, to submit the quarterly reconciliations and proposed FCA, PPCA and FOS calculated factors to be in effect from October 1, 2023, through December 31, 2023.

On September 18, 2023, the Energy Bureau issued a Resolution and Order whereby it granted LUMA until Wednesday, September 20, 2023, to submit the quarterly reconciliations and proposed factors for implementation on October 1, 2023 ("September 18th Order"). Then, on September 20, 2023, the Energy Bureau issued a Resolution and Order instructing LUMA to include in its proposed factors, the impact of the temporary generation at Palo Seco and San Juan, which fuel costs shall be paid with FEMA funds ("September 20th Order"). Additionally, the Energy Bureau ordered LUMA to include in its filing calculations the forecasted savings and cost per kWh savings that such temporary generation would represent to the people of Puerto Rico during the next trimester.

On September 20, 2023, LUMA filed a motion styled *Motion Submitting FCA and PPCA Reconciliations for July and August 2023, Submission of FCA, PPCA, FOS, and EE Calculated Factors, Request for Confidential Treatment and Request for Additional Time to Comply with Portion of September 20th Order* ("September 20th Submission"), which included:

- a. Quarterly reconciliations for the FCA and PPCA riders for July and August 2023;

- b. FCA, PPCA, FOS, and EE Rider calculated factors for the period of October 1, 2023, through December 31, 2023;
- c. A proposal on implementation of EE Rider factor in the Model Bill;
- d. A Request for Confidential Treatment of the spreadsheets in Excel format and with formulae in the file entitled Confidential submitted with the September 20th Submission; and
- e. A request until Friday, September 22, 2023, to comply with that portion of the September 20th Order that required a forecast of savings and costs per kWh regarding the temporary generators.

Regarding that portion of the September 20th Order that required forecasts of savings to be produced by the temporary generators, LUMA requested an extension until Friday, September 22, 2023, to provide the requested projections of savings.

On September 22, 2023, LUMA submitted its response in compliance with that portion of the September 20th Order that required a forecast of savings and costs per kWh savings regarding the temporary generators. *See Motion Submitting Forecast of Savings and Costs per kWh Savings Regarding Temporary Generation, in Compliance with September 20th Order* and Exhibit 1 to same.

On September 25, 2023, this Energy Bureau issued a Resolution and Order with requirements of information to LUMA and Genera PR, LLC, and scheduled a Technical Conference for September 28, 2023, at 1:00 p.m. (“September 25th Order”).

In compliance with the September 25th Order, on September 27, 2021, LUMA submitted its responses to the requirements of information. *See Motion Submitting Responses to Requests for Information in Compliance with September 25th Order*. On that same date, LUMA submitted to

this Energy Bureau a proposed agenda of topics to discuss in the Technical Conference. *See Motion with Proposed Agenda for Technical Conference.*

The Technical Conference was held on September 28, 2023 (“September 28th Technical Conference”). During the Technical Conference, Associate Commissioner Ferdinand A. Ramos posed questions to LUMA personnel regarding the prior period reconciliation of the FCA rider and LUMA’s proposed FCA factor. Commissioner Ramos explained the Energy Bureau’s understanding that the reconciliations and proposed factors should be revised. LUMA informed that it understood Commissioner Ramos’ explanations and requested leave to file a revised reconciliation and revised calculated factors.

LUMA hereby submits a revised reconciliation of the FCA and PPCA riders for July and August 2023 and revised factors for the FCA, PPCA, and FOS riders to be applied for the period from October 1st through December 31, 2023, consistent with the approved and currently existing PREPA Tariff Book and the Final Rate Order. In *Exhibit 2* of this Motion, LUMA depicts the calculation of the prior period adjustment, and in Annex A to Exhibit 2, LUMA explains the changes to the reconciliation.

During the Technical Conference, the Energy Bureau requested information on the capacity of the Aguirre, San Juan 7, and Cambalache plants used by LUMA to calculate the factors. The response to said request is included in *Exhibit 1* of this Motion.

LUMA’s submission of the revised reconciliations and factors includes Excel spreadsheets filed publicly via email in a file entitled *Values* submitted with this Motion. With this Motion, LUMA is also submitting via email confidential Excel spreadsheets with formulae intact submitted in a file entitled *Confidential*. As explained in Section IX *infra*, it is hereby respectfully requested

that the Energy Bureau accept and maintain the files and spreadsheets submitted in the file, *Confidential*, under seal of confidentiality.

II. Energy Bureau Authority

This submission of the quarterly reconciliations and proposed FCA, PPCA, and FOS factors involve the Energy Bureau’s authority under Act 57-2104, as amended by Act 17-2019, to “review and approve and, if applicable, modify the rates or fees charged by electric power service companies in Puerto Rico or the contractor of the transmission and distribution system of Puerto Rico in connection with any matter directly or indirectly related to the provision of electric power services.” *See* Act 17-2014, Section 6.3 (n), 22 LPRC §1054(n) (Spanish language) (2021). Also relevant is the Energy Bureau’s authority to “formulate and implement strategies to achieve the objectives of this Act including, but not limited to, attaining the goal of reducing and stabilizing energy costs....” *See Id.*, Section 6.3 (f).

III. Regulatory Formulas for Calculated FCA, PPCA, and FOS Factors

1. FCA

The FCA is a reconciling tariff mechanism that recovers the costs of fuel consumed in PREPA’s generating units on a quarterly basis. *See* PREPA Tariff Book page 49. The FCA applies to all the PREPA tariffs, except to the RHR tariff (RFR by its Spanish acronym, applicable to residents of public complexes owned by the Public Housing Administration). The formula to calculate the FCA factor is:

$$\text{FCA} = \frac{\text{Total Cost of Fuel} + \text{Prior Period Reconciliation}}{\text{Total Applicable Net Retail kWh Sales}}$$

Id.

The total cost of fuel is the cost of fuel purchased for all PREPA-generating facilities for the three forecasted months in the quarterly time period. *Id.* The prior period reconciliations are the under or over-recovered funds for the first two months of the current quarter and the last month of the prior quarter. *Id.* LUMA, on behalf of PREPA, shall provide the estimates of the reconciling balance with each proposed quarterly filing of the FCA. *Id.* Finally, the applicable net retail kWh sales include the sale of energy to all customer classes, including the net metering clients. *Id.*

The quarterly filing of reconciliations and calculated factors is due the second week of the third month of each quarter, and the calculated factors, approved by this Energy Bureau, go into effect the first month of the following quarter.

The quarterly reconciliations also include, when applicable and as ordered by the Energy Bureau, any unreconciled amounts from the previous quarter if the factors were not adjusted during that period.

2. PPCA

The PPCA is a reconciling tariff mechanism that recovers the costs of purchased power consumed in PREPA's generating units on a quarterly basis. *See* PREPA Tariff Book page 51. The PPCA applies to all the PREPA tariffs, except to the RHR tariff (RFR by its Spanish language acronym) (applicable to residents of public complexes owned by the Public Housing Administration). The formula to calculate the PPCA factor is:

$$\text{PPCA} = \text{Total Costs Purchased Power} + \text{Prior Period Reconciliation}$$

$$\text{Total Applicable Net Retail kWh Sales}$$

Id.

The total cost of purchased power is the cost of purchased resources of energy and capacity for the three forecasted months in the quarterly time period. *Id.* The prior period reconciliations

are the under or over-recovered funds for the first two months of the current quarter and the last month of the prior quarter. *Id.* LUMA shall provide the estimated reconciling balance with each proposed quarterly filing of the PPCA. *Id.* Finally, the applicable net retail kWh sales include the sale of energy to all customer classes, including the net metering clients. *Id.*

3. FOS

The FOS applies to certain general residential services tariffs (GRS by its English-language acronym), including disabled persons, elderly persons, and university students, tariffs for special residential services (LRS by its English-language acronym), and residential services for public projects (RH3 by its English-Language acronym). *Id.*, at page 53. This fuel subsidy applies to monthly consumption that does not exceed 500 kWh. It is calculated quarterly.

For the first \$30 per barrel of fuel, excluding natural gas, clients will receive a credit equivalent to the subsidy factor multiplied by the customer's monthly consumption of up to 400 kWh. *Id.* Customers who consume between 401 kWh and 425 kWh will receive a credit equivalent to a consumption of 400 kWh. *Id.* Finally, for customers that consume between 426 kWh and 500 kWh, the credit will be progressively reduced to 425 kWh to reach 0 kWh or 500 kWh. *Id.*

The quarterly filing of reconciliations and calculated factors is due the second week of the third month of each quarter, and the calculated factors will go into effect the first month of the following quarter. The quarterly reconciliations also include, when applicable and as ordered by the Energy Bureau, any unreconciled amounts from the previous quarter if the factors were not adjusted during that period.

IV. Factors Fixed by the Energy Bureau

In the March 31st Order, this honorable Energy Bureau set the following factors to apply from April 1st through June 31st, 2023:

Adjustment Clause	Factor \$ kWh	Effective Dates
FCA	\$0.146236	April 1, 2023 –June 30, 2023
PPCA	\$0.035997	April 1, 2023 –June 30, 2023
FOS	-\$0.026671	April 1, 2023 –June 30, 2023

Furthermore, in the May 24th Order, this Energy Bureau ordered that the following FCA and PPCA factors would apply from June 1st through June 30th, 2023:

Adjustment Clause	Factor \$ kWh	Effective Dates
FCA	\$0.087978	June 1, 2023 –June 30, 2023
PPCA	\$0.039353	June 1, 2023 –June 30, 2023

In the June 30th Order, this Energy Bureau maintained the prior FCA, PPCA, and FOS factors for July 2023:

Adjustment Clause	Factor \$ kWh	Effective Dates
FCA	\$0.087978	July 1, 2023 –July 31, 2023
PPCA	\$0.039353	July 1, 2023 –July 31, 2023
FOS	-\$0.026671	July 1, 2023 –July 31, 2023

Finally, in the July 31st Order, this honorable Energy Bureau set the following factors to apply from August 1 through September 30, 2023:

Adjustment Clause	Factor \$ kWh	Effective Dates
FCA	\$0.094111	August 1, 2023-September 30, 2023
PPCA	\$0.027931	August 1, 2023-September 30, 2023
FOS	\$0.014335	August 1, 2023-September 30, 2023
EE	\$0	August 1, 2023-September 30, 2023

V. Reconciliations for FCA and PPCA Riders

The reconciliations for the FCA and PPCA riders submitted with this Motion in the files entitled “FAC-PPCA Reconciliation July-August 2023 revised_Values.xlsx” and October-

December 2023 Proposed Factors_Values.xlsx,” include calculations for the reconciliations of the FCA and PPCA riders (costs versus revenues) and the amounts to be recovered or returned for each of these riders.

For the month of July 2023, the Fuel Costs and prior period adjustments (FCA) were \$205,945,839.59, and revenues totaled \$127,184,188.09. There was a revenue insufficiency of \$78,761,651.51.

For the month of August 2023, the Fuel Costs and prior period adjustments (FCA) were \$172,569,871.52, and revenues totaled \$139,503,975.78. There was a credit of \$60,675.02 pertaining to Naturgy shortfalls. There was a revenue insufficiency of \$33,005,220.72.

For the month of July 2023, the Purchased Power Costs, and the prior adjustments (PPCA) were \$38,379,550.91, and revenues totaled \$57,378,744.61. There was an excess revenue of \$18,999,193.70.

For the month of August 2023, the Purchased Power Costs, and the prior adjustments (PPCA) were \$35,707,148.57, and revenues totaled \$41,519,113.25. There was an excess revenue of \$5,811,964.68.

For the months of July and August 2023, there was a net revenue insufficiency of \$85,955,713.85

As informed in the September 20th Submission, LUMA is proposing to return to customers the sum of \$15,680,984.10 collected in the prior period corresponding to the 10% non-federal match of projected costs of the temporary emergency generation site at Palo Seco.

VI. Calculated Factors

The revised “October-December 2023 Proposed Factors.xlsx” Excel spreadsheet includes the proposed FCA, PPCA, and FOS factors calculations. The FCA and FOS factors are presented in Attachment 1, and the PPCA factors in Attachment 2.

In the July 31st Order, the Energy Bureau established that the estimated costs for the Demand Response program be added to the PPCA. The revised PPCA Factor calculation reflects those projected costs in compliance with this order.

LUMA respectfully requests that the Energy Bureau consider the following calculated factors to apply from October 1, 2023, through December 31, 2023:

Adjustment Clause	Factor (\$/kWh)
FCA	\$0.128854
PPCA	\$0.025743
FOS	\$0.016416

VII. EE Rider

In the September 20th Submission, LUMA filed the EE Rider Calculated factor for October 1st through December 31, 2023, and the bill impacts of the EE Rider as ordered by this Energy Bureau on July 31, 2023. LUMA also filed a spreadsheet titled “EE Rider Factor Calculation Per July 31 R&O.xlsx,” which reflects the updated EE Rider Calculation as determined by this Energy Bureau. Thereafter, on September 22, 2023, this Energy Bureau issued a Resolution and Order in Case *In re LUMA’s Initial Budgets*, Case No. NEPR-MI-2021-0004 whereby, in pertinent part, it decided that the costs of the Energy Efficiency programs that are a part of the approved TPP, would be recovered through base rate revenues, rather than through the EE Rider (“September 22nd Budgets Order”).

In light of the September 22nd Budgets Order, the revised filing submitted today, does not include a calculated factor for the EE Rider. Given that the EE Rider will not be implemented on October 1st, LUMA respectfully proposes to eliminate the line item in the Model Bill for the EE Rider. If the EE Rider is implemented in the future, LUMA may include a line item in the Model Bill for the EE Rider.

VIII. List of Documents Filed in Support of Reconciliations and Calculated FCA, PPCA, and FOS Rider Factors.

1. Confidential Folder

1. FCA-PPCA Reconciliation July-August 2023 9.28 revised.xlsx
2. October-December 2023 Proposed Factors.xlsx
3. Exhibit 2_Explanation of Prior Period Adjustment Review -9282023 .xlsx

2. Public Files in the Values Folder

1. Exhibit 1_PROMOD Assumptions.pdf
2. Exhibit 2_Explanation of Prior Period Adjustment Review - 9282023_Values.xlsx
3. Annex A to Exhibit 2_Detailed Explanation.pdf
4. FCA-PPCA Reconciliation July-August 2023 9.28 revised_Values.xlsx
5. October-December 2023 Proposed Factors_Values.xlsx

IX. Request for Confidential Treatment of Excel Files and Supporting Memorandum of Law.

The confidential Excel files mentioned in Section VIIIA of this Motion *supra*, submitted with this Motion, include Excel spreadsheets submitted in native format (.xls) and with formulae intact. They include formulae and original calculations made by LUMA personnel that reveal confidential procedures. They also include sensitive commercial information belonging to LUMA

and/or PREPA that are thus protected by law from disclosure, and that should not be disclosed in native form.

A. Applicable Laws and Regulations to submit information confidentially before the Bureau.

The bedrock provision on the management of confidential information filed before this Bureau, is Section 6.15 of Act 57-2014, known as the “Puerto Rico Energy Transformation and Relief Act.” It provides, in pertinent part, that: “if any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the Commission to treat such information as such ...” 22 LPRA §1054n. If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.*, Section 6.15 (a).

Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that electric power service company shall provide information requested by customers, except for confidential information in accordance with the Rules of Evidence of Puerto Rico.”

Access to the confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.*, Section 6.15(b). Finally, Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Bureau] who needs to know such information under nondisclosure agreements. However,

the [Bureau] shall direct that a non-confidential copy be furnished for public review”. *Id.*, Section 6.15 (c).

The Energy Bureau’s Policy on Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires the identification of the confidential information and the ... filing of a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and the reasons why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* paragraphs 3. The party who seeks confidential treatment of information filed with the Bureau must also file both “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.* paragraph 6.

The aforementioned Energy Bureau policy on the management of confidential information in procedures states the following with regard to access to validated Trade Secret Information:

1. Trade Secret Information

Any document designated by the [Energy Bureau] as Validated Confidential information because it is a trade secret under Act 80-2011 may only be accessed by the Producing Party and the [Bureau], unless otherwise set forth by the [Bureau] or any competent court.

Id. Section D (on Access to Validated Confidential Information).

Relatedly, Energy Bureau Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, includes a provision for filing

confidential information in adjudicatory proceedings before this honorable Bureau. To wit, Section 1.15 provides that “a person has the duty to disclose information to the [Bureau] considered to be privileged information, request the [Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to ... Article 6.15 of Act No. 57-2015, as amended.” *See also* Bureau Regulation No. 9137 on *Performance Incentive Mechanism*, Section 1.13 (addressing disclosure before the Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009.

B. Grounds for Confidentiality

Under the Industrial and Trade Secret Protection Act of Puerto Rico, Act 80-2011, 10 LPRA §§4131-4144, industrial or trade secrets are deemed to be any information:

- (a) That has a present or a potential independent financial value or that provides a business advantage, insofar as such information is not common knowledge or readily accessible through proper means by persons who could make a monetary profit from the use or disclosure of such information, and
- (b) for which reasonable security measures have been taken, as circumstances dictate, to maintain its confidentiality.

Id. §4131, Section 3 Act. 80-2011.¹ Trade secrets include, but are not limited to, processes, methods, mechanisms, manufacturing processes, formulas, projects, or patterns to develop machinery and lists of specialized clients that may afford an advantage to a competitor. *See* Statement of Motives, Act 80-2011. As explained in the Statement of Motives of Act 80-2011,

¹ Relatedly, Rule 513 of the Rules of Evidence of Puerto Rico provides that the owner of a trade secret may invoke the privilege to refuse to disclose, and to prevent another person, from disclosing trade secrets, provide that these actions do not tend to conceal fraudulent actions or lead to an injustice. 32 P.R. Laws Annot. Ap. VI, R 513. If a court of law mandates disclosure of a trade secret, precautionary measures should be adopted to protect the interests of the owner of the trade secret. *Id.*

protected trade secrets include any information bearing commercial or industrial value that the owner reasonably protects from disclosure. *Id.* See also Article 4 of Puerto Rico's Open Data Law, Act 122-2019 (exempting the following from public disclosure: (1) commercial or financial information whose disclosure will cause competitive harm; (2) trade secrets protected by a contract, statute or judicial decision (3) private information of third parties). See Act 122-2019, Articles 4 (ix) and (x) and (xi)).

The Puerto Rico Supreme Court has explained that the trade secrets privilege protects free enterprise and extends to commercial information that is confidential in nature. *Ponce Adv. Med. v. Santiago Gonzalez*, 197 DPR 891, 901-02 (2017) (citation omitted).

The Excel spreadsheets submitted today in native form and with formulae intact in the file entitled *Confidential* are protected as trade secrets. They have commercial value to LUMA and PREPA as they reveal confidential processes and analysis to produce calculations in support of the public filings of the proposed FCA, PPCA, and FOS factors. LUMA and PREPA keep and maintain these native files confidentially and do not disclose them to the public or unauthorized third parties.

LUMA appreciates the importance of placing the Energy Bureau in the position of reviewing the reconciliations and fixing the annual factors. However, to avoid future competitive harms that could ensue if original format spreadsheets with formulae and calculations are publicly disclosed, LUMA respectfully requests that the Excel files submitted today in the file entitled *Confidential*, be received, kept, and maintained confidentially by this Energy Bureau.

The confidential spreadsheets included in the file entitled *Confidential* are: (1) documents with commercial and financial value, and (2) involve data that **is not common knowledge or readily accessible** by third parties who may seek to profit from the data or gain commercial

advantages. The spreadsheets are business documents showing processes, methods, and mechanisms that garner protection under Act 80-2011. They are original documents that have not been disclosed to third parties and whose disclosure would reveal sensitive and private commercial processes employed by LUMA and PREPA. The disclosure of this sensitive commercial information would place LUMA and PREPA in vulnerable and disadvantageous commercial positions that could affect LUMA customers and impact rates. Reasonable measures have been taken to protect the files from disclosure and avoid unauthorized access by third parties that could seek to gain commercial advantages. It is respectfully submitted that the spreadsheets included in the file entitled *Confidential* are trade secrets protected from public disclosure by Act 80-2011.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the filing of the revised FCA and PPCA reconciliations for July and August 2023, and the revised calculated factors to apply to start on October, 2023; and **grant** the request to keep confidentially the spreadsheets that have been filed in excel format and with formulae in the file entitled *Confidential* that is submitted with this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of September 2023.

I hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to counsel for PREPA Joannely Marrero, jmarrero@diazvaz.law, counsels for Genera, alopez@sbgblaw.com and jfr@sbgblaw.com and to the Independent Consumer Protection Office, through Director Hannia Rivera, hrivera@jrsp.pr.gov.



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Exhibit 1

Exhibit 2

Annex A to Exhibit 2
files to be submitted via email