NEPR
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GOBIERNO DE PUERTO RICO
JUNTA REGLAMENTADORA DE SERVICIO PÚBLICO
NEGOCIADO DE ENERGÍA DE PUERTO RICO

IN RE: FATALIDAD OCURRIDA EL 22 DE FEBRERO DE 2023	**CASO NÚM.**: NEPR-IN-2023-0001 SUBJECT: Notice of Withdrawal of Attorney of Record

NOTICE OF WITHDRAWAL OF ATTORNEY OF RECORD

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

1. The past few years have represented a significant transformation for the Puerto Rico Electric Power Authority ("PREPA"). Said transformation has included a reorganization process under Title III of PROMESA[1], the privatization of the operation and maintenance of the Transmission and Distribution system to LUMA Energy and the privatization of the Generation assets to Genera PR, LLC.

2. The transformation has also included a new regulatory framework where, among other things, both the Fiscal Oversight and Management Board ("FOMB") and the Puerto Rico Energy Bureau ("Energy Bureau") approve PREPA's budget[2], its contracts and ultimately decide how PREPA's funds are used.

[1] Puerto Rico Oversight and Management Economic Stability Act 48 U.S.C § 2101 et seq.
[2] https://energia.pr.gov/en/dockets/?docket=nepr-mi-2021-0004
https://energia.pr.gov/wp-content/uploads/sites/7/2023/06/20230625-MI20210004-Resolution-and-Order.pdf

3. At present, the budget approved by both the FOMB and the Energy Bureau for fiscal year 2024 is not sufficient for PREPA to contract the necessary external resources and thus comply with its remaining responsibilities and obligations.

4. Likewise, the above directly affects the relationship between PREPA and its contractors since the government entity does not have the funds to cover the contracts that would allow it to continue representing PREPA in cases before the federal and state courts as well as administrative forums.

5. The Díaz & Vázquez Law Firm P.S.C., ("the firm") has a professional legal services contract with PREPA. However, said contract does not have sufficient funds to cover the legal representation of PREPA in those matters that are not related to Title III of PROMESA, including legal representation in the case of caption.

6. For this reason, we request that the Energy Bureau accept our withdrawal as legal representatives of PREPA and allow a reasonable period of time, of no less than 60 days for new legal counsel to appear on behalf of PREPA. This time will allow the new representative to provide an informed and responsible representation of PREPA.

7. Any notification related to this case should be directed to the attention of PREPA's General Counsel:

Lcdo. Lionel Santa Crispín
Consultor Jurídico
Directorado de Asuntos Jurídicos
Autoridad de Energía Eléctrica
PO Box 363928
San Juan PR 00936-3928
Lionel.santa@prepa.pr.gov
Tel. 787-521-4471

WHEREFORE, we respectfully request that this forum take notice of the above and ENTER ORDER granting the withdrawal of legal representation for the attorney or attorneys of record and order the notification of any order or resolution in the case of caption be notified to the attorney and address identified above.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 10th day of October 2023.

/s Joannely Marrero Cruz
Joannely Marrero Cruz
TSPR 20,014
jmarrero@diazvaz.law

s/ Giuliano Vilanova Feliberti
Giuliano Vilanova Feliberti
TSPR 22718
gvilanova@diazvaz.law

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

I hereby certify that the foregoing has been filed with the Clerk of the Puerto Rico Energy Bureau using the designated electronic filing system, having also notified a copy to Atty. **Yahaira De la Rosa Algarín**: yahaira.delarosa@us.dlapiper.com.

In San Juan, Puerto Rico, this 10th day of October 2023.

/s Joannely Marrero Cruz
Joannely Marrero Cruz