

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

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| NEPR |
| Received: |
| Dec 15, 2023 |
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IN RE:
IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

SUBJECT: Submission of FCA and PPCA Reconciliations for September, October, and November 2023, and FCA, PPCA and FOS, Calculated Factors, and Request for Confidential Treatment

MOTION SUBMITTING FCA AND PPCA RECONCILIATIONS FOR SEPTEMBER, OCTOBER AND NOVEMBER 2023, 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

Pursuant to a Resolution and Order dated January 17, 2020, this honorable Puerto Rico Energy Bureau (“Energy Bureau”) has approved and revised the factors associated with several riders, including contributions in lieu of taxes cost adjustment (CILTA), help to human subsidies (SUBA-HH), non-help to human subsidies (SUBA-NHH), Fuel Charge Adjustment (FCA), the Purchased Power Charge Adjustment (PPCA), and the Fuel Oil Subsidy (FOS), and their reconciliations, in this proceeding, Case No. NEPR-MI-2020-0001. Reconciliations and FCA, PPCA, and FOS calculated factors are filed quarterly with this Honorable Energy Bureau pursuant to the Final Rate Order issued on January 10, 2017, Case CEPR-AP-2015-0001, as amended (“Final Rate Order”).

LUMA does not own or operate generation facilities nor purchase any fuel for generation. LUMA's operational costs are not included in the FCA, PPCA, and FOS riders. The Final Rate Order and the Puerto Rico Electric Power Authority's ("PREPA") tariff book require the calculation of the FCA and PPCA riders to ensure the pass-through of fuel used in generation by PREPA and the power purchased from private generators, without any markup, profit or additional charges that would benefit PREPA. As Operator of PREPA's Transmission and Distribution System, and in furtherance of its duties over system regulatory matters under Section 5.6 of the Puerto Rico Transmission and Distribution Operation and Maintenance Agreement ("T&D OMA"), supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement, LUMA is tasked with the preparation of the quarterly reconciliations and calculated factors for the FCA, PPCA, and FOS riders.

In a Resolution and Order issued in this proceeding on September 29, 2023, this Energy Bureau set the FCA, PPCA, and FOS factors to be applied from October 1, 2023, until December 31, 2023 ("September 29th Order"). The Energy Bureau also determined that LUMA shall include the Energy Efficiency Rider ("EE Rider") in customer bills using a zero dollar value until June 30, 2024. Furthermore, in the September 29th Order, the Energy Bureau directed that on or before December 15th, 2023, at noon, LUMA shall file the FCA, PPCA, and FOS reconciliations for September through November 2023, as well as the calculated factors to be applied for the quarter beginning on January 1, 2024.

LUMA has calculated the reconciliations for the FCA and PPCA riders for September through November 2023 and the factors for the FCA, PPCA, and FOS riders to be applied for the period from January 1, 2024, through March 31, 2024, consistent with the approved and currently existing PREPA Tariff Book and the Final Rate Order. The projections used for the calculated

factors consider all generation that is currently projected to be available for the period from January 1, 2024, through March 31, 2024, including the temporary emergency generation at the Palo Seco and San Juan power plants.

LUMA understands that Genera’s Fuel Optimization Plan has not been approved and is not yet final. Thus, the calculated factors do not consider said Plan.

LUMA’s submission 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 VIII *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 LPRA §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:

$$\text{PPCA} = \frac{\text{Total Costs Purchased Power} + \text{Prior Period Reconciliation}}{\text{Total Applicable Net Retail kWh Sales}}$$

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 for October through December 2023

In the September 29th Order, this honorable Energy Bureau set the following factors to apply from October 1st 2023, through December 31st 2023:

| Adjustment Clause | Factor \$ kWh | Effective Dates |
|--------------------------|--------------------------|------------------------------------|
| FCA | \$0.130057 | October 1, 2023 –December 31, 2023 |
| PPCA | \$0.025168 | October 1, 2023 –December 31, 2023 |
| FOS | \$0.016416 | October 1, 2023 –December 31, 2023 |
| EE | \$0 | October 1, 2023 –June 30, 2024 |

V. Reconciliations

1. FCA and PPCA Riders

The reconciliations for the FCA and PPCA riders submitted with this Motion in the files entitled “FAC-PPAC Reconciliation Sept-Oct- Nov 2023 _Values.xlsx” and “January – March 2024 Proposed Factors_Values.xlsx,” include 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 September 2023, the fuel costs and prior period adjustments (FCA) were \$174,203,606.65 and revenues totaled \$143,002,293.53. There was a revenue insufficiency of \$31,201,313.12.

For the month of October 2023, the fuel costs and prior period adjustments (FCA) were \$229,042,052.78 and revenues totaled \$199,849,501.53. There was a revenue insufficiency of \$29,192,551.25.

For the month of November 2023, the fuel costs and prior period adjustments (FCA) were \$191,999,913.31 and revenues totaled \$186,252,966.78. PREPA received a credit pertaining to seller shortfalls from Naturgy of \$2,187,186.30 resulting in a revenue insufficiency of \$3,559,760.23.

For the quarter, the fuel costs and prior period adjustments (FCA) were \$595,245,572.74 and revenues totaled \$529,104,761.84. PREPA received a credit pertaining to seller shortfalls from Naturgy of \$2,187,186.30 resulting in a total revenue insufficiency of \$63,953,624.60.

For the month of September 2023, the purchased power costs, and the prior adjustments (PPCA) were \$37,367,242.45 and revenues totaled \$42,163,013.75. There was an excess revenue of \$4,795,771.29.

For the month of October 2023, the purchased power costs, and the prior adjustments (PPCA) were \$25,668,462.79 and revenues totaled \$38,720,258.48. There was an excess revenue of \$13,051,795.69.

For the month of November 2023, the purchased power costs, and the prior adjustments (PPCA) were \$26,925,383.40 and revenues totaled \$35,893,387.71. There was an excess revenue of \$8,968,004.31.

For the quarter, the purchased power costs, and the prior adjustments (PPCA) were \$89,961,088.65 and revenues totaled \$116,776,659.94. There was a total excess revenue of \$26,815,571.29.

2. CBES Program

On July 31, 2023, this 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 approved the FCA, PPCA reconciliations for May and June 2023, set the FCA, PPCA, and set the FOS factors to be implemented from August 1, 2023 through September 30, 2023 (“July 31st Order”). In the July 31st Order, the Energy Bureau also directed that LUMA should recover through the PPCA and include in the calculated PPCA factor, the costs of the Emergency Battery DR Program, also known as the Customer Battery Energy Sharing Program (“CBES Program”).¹ The PPCA Factor calculation that LUMA filed with this Energy Bureau for the period of October 1st, 2023 through December 31st, 2023, reflected those projected costs in compliance with the July 31st Order.

In this reconciliation, LUMA is including the actual costs for the quarter of the CBES Program. The projected total costs for the CBES Program for the period of September 2023 to November 2023 were \$1,839,375.00 while actual program costs were \$190,403.83. This resulted in a difference of \$1,648,971.17. *See* January – March 2024 Proposed Factors_Values.xlsx, tab entitled “CBES Program Costs & Estimates.”

VI. Calculated Factors

The excel spreadsheet entitled “January – March 2024 Proposed Factors_Values.xlsx,” includes the proposed FCA, PPCA, and FOS factors. FCA and FOS are presented in Attachment 1 and the PPCA factors are presented in Attachment 2. The PPCA Factor calculation reflects the projected costs of the CBES Program. *See id.*, tab entitled “CBES Program Cost Estimates.”

LUMA respectfully requests that the Energy Bureau review the calculated factors that are referenced in the table below to apply for the next quarter from January 1st, 2024, to March 30th,

¹ The CBES is a part of LUMA’s Energy Efficiency and DR Transition Period Plan that was approved by this Energy Bureau in Case *In re Energy Efficiency and DR Transition Period Plan*, No. NEPR-MI-2022-0001 (“approved TPP”).

2024. Given that the factors to be approved by this Energy Bureau shall be implemented starting on January 1, 2024, which is a legal holiday, LUMA appreciates the opportunity to answer questions that this Energy Bureau may and implement the factors in the billing system ahead of the new year’s holiday weekend.

| Adjustment Clause | Factor (\$/kWh) |
|-------------------|-----------------|
| FCA | \$0.110912 |
| PPCA | \$0.035016 |
| FOS | \$0.014897 |
| EE | \$0 |

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

2. Confidential Folder

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|---|
| <ol style="list-style-type: none"> 1. Precio Ponderado Análisis _ 2023.11.30 REG.xlsx 2. January – March 2024 Proposed Factors.xlsx 3. FAC-PPAC Reconciliation Sept-Oct- Nov 2023.xlsx 4. Q-3 FY 2024 Load Forecast December 2023 Update.xlsx |
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3. Public Files in the Values Folder

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| <ol style="list-style-type: none"> 1. Inventory (Fuel) – November 30, 2023: <ol style="list-style-type: none"> a. 2023Nov30_Fuel Inventory Weighted Average Fuel Price Report_PREPA system.pdf |
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| <p>b. Precio Ponderado Análisis _ 2023.11.30 REG_Values.xlsx</p> <ul style="list-style-type: none"> • 23-00445 REPORT EOM INVENTORY # 6 FUEL OIL - # 2 FUEL OIL 30NOV2023 @ GENERA CSJ.pdf • 23-00446 EOM INVENTORY # 6 FUEL OIL - # 2 FUEL OIL 30NOV2023 @ GENERAPR AGUIRRE.pdf • 23-00447 EOM INVENTORY # 2 FUEL OIL 30-NOV-2023 @ GENERA YABUCOA.pdf • Full Report 1310100017295 - PALO SECO.pdf • Full Report 1310100017297 – JOBOS.pdf • Full Report 1310100017298 - VEGA BAJA.pdf • GA023717 PREPA COSTA SUR TANK INVENTORY-11-23.pdf • GA023718 PREPA DAGUAO TANK INVENTORY-11-23.pdf • GA023719 PREPA Mayagüez Tank Inventory 11-23.pdf • GA023720 PREPA CAMBALACHE TANK INVENTORY-11-23.pdf • 2023Nov30_Fuel Inventory Weighted Average Fuel Price Report_PREPA system.pdf <p>2. January – March 2024 Proposed Factors_Values.xlsx</p> <p>3. FAC-PPAC Reconciliation Sept-Oct- Nov 2023_Values.xlsx</p> <p>4. Q-3 FY 2024 Load Forecast December 2023 Update_Values.xlsx</p> |
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VIII. 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. 80-2011.² 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, 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

² 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.*

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, FOS and EE Rider 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 FCA and PPCA reconciliations for September through November 2023, and the calculated FCA, PPCA, FOS and EE rider factors to apply to start on January 1, 2024; 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 15th day of December 2023.

I hereby certify that I 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 Lionel Santa lionel.santa@prepa.com, counsels for Genera, alopez@sbglaw.com and jfr@sbglaw.com and to the Independent Consumer Protection Office, through Director Hannia Rivera, hrivera@jrsp.pr.gov.



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Supporting files to be submitted via email