

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

<p><b>NEPR</b></p> <p><b>Received:</b></p> <p><b>Dec 18, 2023</b></p> <p><b>7:45 PM</b></p>
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**IN RE:**

IMPLEMENTATION OF THE PUERTO  
RICO ELECTRIC POWER AUTHORITY  
INTEGRATED RESOURCE PLAN AND  
MODIFIED ACTION PLAN

**CASE NO. NEPR-MI-2020-0012**

**SUBJECT: Motion for Extension of Time to File Memorandum of Law in Support of Confidential Treatment of Exhibit 1 to the “Motion to Submit Executed Interconnection Agreements and Request for Confidential Treatment” Filed by LUMA on December 7, 2023**

**MOTION FOR EXTENSION OF TIME TO FILE MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF EXHIBIT 1 TO THE “MOTION TO SUBMIT EXECUTED INTERCONNECTION AGREEMENTS AND REQUEST FOR CONFIDENTIAL TREATMENT” FILED BY LUMA ON DECEMBER 7, 2023**

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly “LUMA Energy”), through the undersigned counsel, and respectfully state and request the following:

1. On December 6, 2023, LUMA filed with this honorable Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) a motion informing, among others, that, as of November 30, 2023, LUMA had executed thirteen (13) Interconnection Agreements with Tranche 1 proponents and one (1) non-Tranche 1 proponent, all identified in an Exhibit 1 to that motion. *See Informative Motion on Execution of Tranche 1 Interconnection Agreements, Request for Determination Regarding Interconnection Costs and Request for Confidential Treatment* filed on December 6, 2023 (“December 6<sup>th</sup> Motion”). LUMA also informed that it would be providing copy of these executed agreements to the Energy Bureau in the coming days.
2. On December 7, 2023, LUMA filed with the Energy Bureau a *Motion to Submit Executed Interconnection Agreements and Request for Confidential Treatment* (“December 7<sup>th</sup>

Motion”) whereby it submitted fourteen (14) executed Interconnection Agreements as Exhibit 1 (“*December 7<sup>th</sup> Exhibit 1*”) to the December 7<sup>th</sup> Motion. LUMA also requested that the *December 7<sup>th</sup> Exhibit 1* be maintained under seal of confidentiality and informed the Energy Bureau that a Memorandum of Law in support of the request for confidentiality and the redacted version of Exhibit 1 would be submitted within the next ten (10) days.

3. The undersigned are in the process of preparing the mentioned Memorandum of Law and redacted *December 7<sup>th</sup> Exhibit 1*, and, given the considerable size of the *December 7<sup>th</sup> Exhibit 1*, despite our best efforts, additional time is needed to complete the submittal to this honorable Energy Bureau. It is anticipated that this effort may be completed within the next three (3) days.

**WHEREFORE**, it is respectfully requested that this honorable Energy Bureau grant an extension of three (3) days, up to and including December 21, 2023, to file the Memorandum of Law in support of the request for confidential treatment of Exhibit 1 to the “Motion to Submit Executed Interconnection Agreements and Request for Confidential Treatment” filed by LUMA on December 7, 2023 and the redacted version of such Exhibit 1.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on this 18<sup>th</sup> day of December 2023.

We hereby certify that I filed this motion using the electronic filing system of this Puerto Rico Energy Bureau and that a copy of this motion was notified by email to [lionel.santa@prepa.com](mailto:lionel.santa@prepa.com), [alopez@sbgblaw.com](mailto:alopez@sbgblaw.com); [jfr@sbgblaw.com](mailto:jfr@sbgblaw.com); [jlago@sbgblaw.com](mailto:jlago@sbgblaw.com).



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