

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

<b>NEPR</b>  <b>Received:</b>  <b>Dec 19, 2023</b>  <b>7:04 PM</b>
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**IN RE:**

REVIEW OF LUMA’S INITIAL BUDGET

**CASE NO.:** NEPR-MI-2021-0004

**SUBJECT:** Request for Extension of Time to Comply with Resolution and Order Dated June 25, 2023

**REQUEST FOR EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND  
ORDER DATE JUNE 25, 2023**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsel of record, and respectfully state and request the following:

1. On June 25, 2023, the Energy Bureau issued a Resolution and Order titled *Determination on the FY24 Annual Budgets for the Electric Utility System – LUMA, Genera, and PREPA* (“June 25<sup>th</sup> Order”), through which it (1) modified the Proposed Consolidated FY2024 Budget; (2) approved the modified budgets subject to compliance with various orders included in the June 25<sup>th</sup> Order; and (3) included a series of determinations and orders addressed to Genera regarding the GenCo Budget.<sup>2</sup>

2. Pertinent to this Motion, the June 25<sup>th</sup> Order included reporting requirements outlined in its Attachment I, comprising but not limited to:

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<sup>1</sup> 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, 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 the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

<sup>2</sup> See June 25<sup>th</sup> Order, pp. 16 - 21.

- a. implementation of Grid Modernization Plan Report; and
- b. permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan Updates.

3. On September 1, 2023, Genera filed a document titled *Motion to Submit Monthly Maintenance Report for August 2023, in Compliance with Resolution and Order dated June 25, 2023* (“September 1<sup>st</sup> Motion”). Relevant to the present matter, Genera requested modifications to the filing schedule for the aforementioned reports:

- a. the Implementation of Grid Modernization Plan within twenty (20) days following the conclusion of each bi-monthly reporting period; and
- b. the submission of the Permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan Updates within twenty (20) days after the end of the monthly reporting period.

4. Nevertheless, Genera respectfully requests a two-week extension, proposing a new deadline of January 3, 2024, to submit the November reports for the Grid Modernization Plan and the Permanent and Emergency Work-Related Federal Funding Report & Infrastructure Plan Updates. This request arises due to technical issues, the specific nature of which, whether software or hardware-related, remains unidentified, confronted by Genera's personnel responsible for preparing and providing these reports. The requested two-week extension is anticipated to provide adequate time for Genera to resolve these issues and to prepare and submit the pending reports.

5. Genera assures the Energy Bureau that this request for an extension is made in utmost good faith. The sole purpose of this extension is to ensure Genera's full and accurate compliance with the June 25<sup>th</sup> Order.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **grant** Genera a two-week extension, until January 3, 2024, to comply with the June 25<sup>th</sup> Order concerning the reports specified in Attachment I of the June 25<sup>th</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 19<sup>th</sup> day of December 2023.

**ECIJA SBGB**  
PO Box 363068  
San Juan, Puerto Rico 00920  
Tel. (787) 300.3200  
Fax (787) 300.3208

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo  
[jfr@sbgblaw.com](mailto:jfr@sbgblaw.com)  
TSPR 9,669

/s/ Alejandro López-Rodríguez  
Alejandro López-Rodríguez  
[alopez@sbgblaw.com](mailto:alopez@sbgblaw.com)  
TSPR 22,996

/s/ Joaquín M. Lago González  
Joaquín M. Lago González  
[jlago@sbgblaw.com](mailto:jlago@sbgblaw.com)  
TSPR 20,678

## CERTIFICATE OF SERVICE

I 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 and that I will send an electronic copy of this motion to PREPA, through its counsels of record: Juan M. Martínez-Nevárez, at [jmartinez@gmlex.net](mailto:jmartinez@gmlex.net), Alexis G. Rivera-Medina, at [arivera@gmlex.net](mailto:arivera@gmlex.net), Joselyn Rodríguez-Gonzalez, at [jrodriguez@gmlex.net](mailto:jrodriguez@gmlex.net), and Mirelis Valle-Cancel, at [mvalle@gmlex.net](mailto:mvalle@gmlex.net); and to LUMA, through its counsels of record: Margarita Mercado Echegaray, at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); Ana Margarita Rodríguez Rivera, at [ana.rodriguezrivera@us.dlapiper.com](mailto:ana.rodriguezrivera@us.dlapiper.com); and Julian Anglada Pagan, at [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com).

In San Juan, Puerto Rico, this 19<sup>th</sup> day of December 2023.

*/s/ Alejandro López-Rodríguez*  
Alejandro López-Rodríguez