

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

NEPR

Received:

Feb 16, 2024

6:19 PM

IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

CASE NO.: NEPR-MI-2021-0004

MOTION FOR EXTENSION OF TIME TO COMPLY WITH JANUARY 23RD RESOLUTION

TO THE HONORABLE ENERGY BUREAU,

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") through its undersigned legal representation and, very respectfully, informs and requests as follows:

1. On January 23rd, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a *Resolution and Order* ("January 23rd Resolution") whereby it commanded PREPA as follows:

The Energy Bureau **ORDERS** PREPA to disclose within **thirty (30) days of** publication of this Resolution and Order, reconciliations of irrigation district shortfalls with the Government of Puerto Rico payments toward mandated reimbursements pursuant to underlying Acts. Any gaps or deficiencies shall also be explained. PREPA must inform the Energy Bureau of its measures to unwind the current ratepayer SUBA-NHH subsidy and comprehensively conform to long-established laws providing for adequate revenue sources to cover irrigation funding obligations.

2. The current deadline to comply with the January 23rd Resolution is February 22nd, 2024.

3. PREPA hereby informs that it is currently reviewing responsive data in order to comply with the January 23rd Resolution. However, due to previous commitments, PREPA very respectfully submits it will not be able to complete its

Motion in Compliance with the January 23rd Resolution within the mandated deadline of February 22nd.

4. Specifically, from February 5th to 15th, Eng. Jaime Umpierre, Director of the Irrigation District, and Lionel Santa, Esq., Director of Legal Affairs, were traveling both to the continental United States (Florida) and Europe (England) to meet with PREPA's insurance brokers, insurers, and reinsurers. This, with the purpose of renegotiating the terms and conditions of the portfolio of insurance and reinsurance policies held by PREPA. The week prior to these meetings, Mr. Umpierre and Mr. Santa invested their time preparing the corresponding presentations for the meetings.

5. In addition to the foregoing, this Monday, February 19th, 2024, is Presidents' Day, which is an observed Federal Holiday.

6. Unfortunately, the remaining days before the February 22nd deadline are insufficient for PREPA to responsibly complete the analyses and plans required in the January 23rd Resolution.

7. Considering all of the foregoing, PREPA very respectfully requests an extension of time of 21 days, until March 14th, 2024, to submit its Motion in Compliance with the January 22nd Resolution.

8. The instant request for extension of time is reasonable, made in good faith and not with the intent to cause an undue delay of the proceedings.

WHEREFORE, PREPA respectfully requests the Energy Bureau to **GRANT** the request for extension of time and, consequently, allow PREPA until March 14th, 2024, to comply with the January 23rd, Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of February 2024.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, which automatically notifies all attorneys of record with copy of the filed motion.

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