

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

NEPR Received: Mar 13, 2024 2:55 PM
--

IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

CASE NO.: NEPR-MI-2021-0004

**RENEWED MOTION FOR EXTENSION OF TIME
TO COMPLY WITH THE JANUARY 23RD RESOLUTION AND ORDER**

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 Order") whereby it required 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. On February 16th, 2024, PREPA requested an extension of time, until March 14th, 2024, to comply with the January 23rd Resolution ("First Extension of Time").

3. On February 22nd, 2024, the Energy Bureau granted the First Extension of Time.

4. PREPA hereby informs, despite all its diligent efforts, it will not be able to complete the Motion in Compliance with the January 23rd Resolution within the authorized timeframe.

5. Eng. Jaime Umpierre, Director of the Irrigation District, and Nelson Morales, Director of the Finance Department, are working on the required reconciliations and other information requested in the January 23rd Resolution. Specifically, PREPA is gathering and analyzing historical financial information to assess the operating deficit for the Irrigation District; evaluating from a financial, legal, and contractual perspective the necessary rate increases to government and industrial customers to cover the expected shortfall; and quantifying the impacts on water service quality from potential financial shortfalls and risks to reduced ongoing operations.

6. Moreover, Eng. Umpierre and Mr. Morales are also working on other equally important matters. As the Energy Bureau is aware, PREPA is currently finalizing the auditing process of its 2022 financial statements, which involves constant submission of information and meetings to address outstanding matters. Eng. Umpierre and Mr. Morales have had an active role in this auditing process.

7. Additionally, PREPA is working on its Fiscal Year 2025 budget proposal, while also preparing its submission for the Rate Case, which requires budgetary projections for three (3) fiscal years. Due to their role in PREPA, Eng. Umpierre and Mr. Morales have had an active participation in all these endeavors as well.

8. The concurrence of all these important tasks, along with their daily operational responsibilities, have prevented Eng. Umpierre and Mr. Morales from

completing the required reconciliations and other tasks required in the January 23rd Order.

9. PREPA has been working diligently to comply with the January 23rd Order. Unfortunately, the above-mentioned competing tasks, along with PREPA's limited human resources, have delayed the production of the required information within the allotted time granted by this Honorable Bureau.

10. Considering the foregoing, PREPA very respectfully requests an extension of time of 20 days, until April 3rd, 2024, to submit its Motion in Compliance with the January 23rd Order.

11. 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 April 3rd, 2024, to comply with the January 23rd Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of March, 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.

GONZÁLEZ & MARTÍNEZ
1509 López Landrón
Seventh Floor
San Juan, PR 00911-1933
Tel.: (787) 274-7404

s/ Mirelis Valle Cancel

Mirelis Valle-Cancel

TSPR No.: 21,115

E-mail: mvalle@gmlex.net

s/ Alexis G. Rivera Medina

Alexis G. Rivera-Medina

TSPR No.: 18,747

E-mail: arivera@gmlex.net