

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

NEPR

Received:

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IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

CASE NO.: NEPR-MI-2021-0004

**REQUEST FOR CONFIDENTIAL TREATMENT OF EXHIBITS A-D OF THE MOTION IN
COMPLIANCE WITH THE MARCH 1ST 2024 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 April 18th, 2024, PREPA submitted its *Motion in Compliance with the March 1st Resolution and Order*. Along with the aforesaid motion, PREPA submitted, under seal, an unredacted version of the following exhibits:

- a. **Exhibit A** – Report of active security job posts corresponding to the 70% assigned to Genera under the Génesis Security contract 2023-P00084 (North Region) at the time of the transition in June 2023.
- b. **Exhibit B** - Report of active security job posts corresponding to the 70% assigned to Genera under the Génesis Security contract 2023-P00077 (South Region) at the time of the Genera transition in June 2023.
- c. **Exhibit C** - Report of active security job posts corresponding to the 30% assigned to PREPA under the Génesis Security contract 2023-P00084 (North Region) at the time of the Genera transition in June 2023.
- d. **Exhibit D** - Report of active security job posts corresponding to the 30% assigned to PREPA under the Génesis Security contract 2023-P00077 (South Region) at the time of the Genera transition in June 2023.

(jointly, hereafter, the "Exhibits").

2. PREPA, very respectfully, requests the Energy Bureau to keep the unredacted versions of the Exhibits confidential and publish the redacted versions submitted herein. See **Exhibit A Redacted**- Security Job Posts Genera - North Region; **Exhibit B Redacted**- Security Job Posts Genera - South Region; **Exhibit C Redacted** - Security Job Posts PREPA - North Region; and **Exhibit D Redacted** - Security Job Posts PREPA - South Region.

3. The proposed redacted versions of the Exhibits seek to protect from public disclosure the location of PREPA's and Genera PR LLC's security job posts, which can be found under the column titled "Puestos", and the equipment carried by each security guard, which can be found under the column titled "Clase de Servicio".¹

4. PREPA seeks to protect the abovementioned information from disclosure because their publication could jeopardize PREPA's and Genera's security operations. Unscrupulous individuals could use this information in their favor to identify vulnerabilities in the security operation and plan criminal activities such as vandalism and illegal appropriation of PREPA's and Genera's property accordingly.

¹ As stated in the *Motion in Compliance with the March 1st 2024 Resolution and Order*, Exhibits A and B reflect the active security job posts transferred to Genera at the time of the transition was provided to PREPA between May and June 2023. Presently, PREPA is unaware of any subsequent changes by Genera regarding these security job posts.

5. Maintaining this information as confidential does not deprive the public of their right to oversee PREPA's and Genera's management of public funds and protects PREPA's and Genera's security operations.

6. In compliance with the Energy Bureau of the Puerto Rico Public Service Regulatory Board's ("Energy Bureau") Policy on Management of Confidential Information, CEPR-MI-2016-0009, below is the required table summarizing the reasons for confidential treatment:

| Document | Name | Pages where Confidential Information is Found | Summary of Basis for Confidentiality Protection | Date Filed |
|-----------|---|---|--|-------------------------------|
| Exhibit A | Servicios de Activos de Vigilancia y Protección Genera 2023-P00084 Región Norte | 1-2 | Protect from disclosure the location of PREPA's and Genera PR LLC's security job posts, and the equipment carried by each security guard, because their publication could jeopardize PREPA's and Genera's security operations. | April 17 th , 2024 |
| Exhibit B | Servicios de Activos de Vigilancia y Protección Genera 2023-P00077 Región Sur | 1-3 | Protect from disclosure the location of PREPA's and Genera PR LLC's security job posts, and the equipment carried by each security guard, because their publication could | April 17 th , 2024 |

| | | | | |
|-----------|---|-----|--|-------------------------------|
| | | | jeopardize PREPA's and Genera's security operations. | |
| Exhibit C | Servicios de Activos de Vigilancia y Protección Autoridad de Energía Eléctrica 2023-P00084 Región Norte | 1-2 | Protect from disclosure the location of PREPA's and Genera PR LLC's security job posts, and the equipment carried by each security guard, because their publication could jeopardize PREPA's and Genera's security operations. | April 17 th , 2024 |
| Exhibit D | Servicios de Activos de Vigilancia y Protección Autoridad de Energía Eléctrica | 1 | Protect from disclosure the location of PREPA's and Genera PR LLC's security job posts, and the equipment carried by each security guard, because their publication could jeopardize PREPA's and Genera's security operations. | April 17 th , 2024 |

WHEREFORE, PREPA respectfully requests the Energy Bureau to take **NOTICE** of the information submitted herein, **GRANT** the request for confidential treatment of Exhibits A-D and **PUBLISH** the unredacted the versions of said exhibits.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of April 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>. We also certify that a true and exact copy of this document was notified to the following parties through attorneys of record: Genera PR LLC through Jorge Fernández Reboredo, jfr@sbgblaw.com; Alejandro López Rodríguez, alopez@sbgblaw.com; Joaquín M. Lago González, jlago@sbgblaw.com; and at the following email addresses legal@genera-pr.com; regulatory@genera-pr.com; and LUMA Energy LLC and LUMA Energy ServCo, LLC through Margarita Mercado Echegaray, margarita.mercado@us.dlapiper.com; Julian Anglada Pagán, julian.angladapagan@us.dlapiper.com.

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