

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

NEPR Received: Jun 17, 2024 7:27 PM
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IN RE:

REVIEW OF LUMA’S INITIAL BUDGET

CASE NO.: NEPR-MI-2021-0004

SUBJECT: Urgent Request to Submit Workpapers for GenCo’s FY2025 Budget and to File Genera’s Response to Request for Information Issued on June 12, 2024

**URGENT REQUEST FOR EXTENSION TO SUBMIT WORKPAPERS FOR GENCO’S
FY2025 BUDGET AND TO FILE GENERA’S RESPONSES TO REQUEST FOR
INFORMATION ISSUED ON JUNE 12, 2024**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On May 25, 2024, LUMA filed a document titled *Request for Approval of T&D Budgets and Submission of GenCo Budgets for FY 2025 and Budget Allocations for the Electric Power System* (“Fiscal Year 2025 Budget Submission”), through which LUMA submitted for approval the Transmission & Distribution Budgets and information for which confidentiality was asserted. In this Motion, LUMA also submitted the GenCo Budgets (“GenCo’s FY2025 Budget Proposal”).

2. On June 12, 2024, the Energy Bureau issued a Resolution and Order with the subject *Establishment of FY 2025 Budgets, Requirement of Information (“ROI”), and Procedural*

¹ 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 PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

Calendar (“June 12th Resolution”), whereby the Energy Bureau deemed it appropriate to establish a Procedural Calendar for matters concerning the Fiscal Year 2025 Budget Submission. As part of this Procedural Schedule, the Energy Bureau scheduled a Virtual Technical Conference for June 20, 2024. In the June 12th Resolution, the Energy Bureau ordered Genera to respond, on or before June 17, 2024, to a Requirement of Information (“ROIs”) set forth in Attachment A to the June 12th Resolution. Additionally, in the June 12th Resolution, the Energy Bureau ordered Genera to file within three (3) business days of the publication of the June 12th Resolution, meaning June 17, 2024, all workpapers and supporting material used to develop GenCo’s FY2025 Budget proposals in native form with all formulas and links intact and any Excel spreadsheets provided unlocked.

3. Genera respectfully informs the Energy Bureau that, while evaluating the June 12th Resolution and the ROI outlined in Attachment A, it has come across certain necessary amendments that needed to be corrected in the Workpapers for GenCo’s FY2025 Budget Proposal. As such, Genera respectfully requests an extension of time until June 19, 2024, to conduct the necessary amendments and present the corrected workpapers and supporting material used to develop GenCo’s FY2025 Budget Proposals in native form with all formulas and links. Genera does not foresee that the amendments will be substantial.

4. Regarding the ROI included in Attachment A to the June 12th Resolution, Genera respectfully requests an extension until Wednesday, June 19, 2024, to submit the corresponding response. The ROI asks for extensive information covering Genera’s budget and operational plans, including detailed necessary maintenance expenses (“NME”), federal funding allocations, and shared services arrangements. While Genera has been proactively working on completing its response to the requirement of information and on compiling all necessary workpapers and supporting material, several unforeseen challenges have arisen. These challenges include the

complexity of collating extensive data from multiple departments, ensuring the accuracy and integrity of the information provided, and coordinating with various stakeholders to finalize the details required by the Energy Bureau. Furthermore, Genera's personnel dedicated the past days to stabilizing the system after the emergency caused by the June 12, 2024 events, which are now being investigated by the Energy Bureau.²

5. Genera will use the requested additional time and the proposed new deadline of June 19, 2024, to ensure that all necessary information is compiled accurately and comprehensively. This additional time will allow Genera to thoroughly review and verify all data to ensure accuracy and completeness, collaborate with internal and external stakeholders to gather all relevant information and address any discrepancies, and ensure that all workpapers and supporting materials are in the required native format with all formulas and links intact and that any Excel spreadsheets are unlocked. Genera understands the importance of adhering to the established Procedural Calendar and the need for timely and accurate budget submissions. Genera assures the Energy Bureau that it is committed to meeting these requirements and providing the highest quality information to support GenCo's FY 2025 Budget Proposal.

6. Additionally, regarding the filing of Genera's presentation for the Virtual Technical Conference, which is due on June 18, 2024, Genera respectfully requests that this deadline be rescheduled. We propose moving the filing deadline to Thursday, June 20, 2024. This rescheduling is requested to allow Genera sufficient time to adequately prepare for the hearing. Over the past several weeks, Genera has been engaged in addressing multiple critical and emergent issues. These include urgent maintenance tasks that are essential to ensure the uninterrupted operation of Legacy Generation Assets, as well as complex coordination efforts related to both short-term and long-

² *In Re: June 12, 2024 Large-Scale Bluesky Customer Interruptions*, case no. NEPR-IN-2024-0003.

term operational needs. These activities have demanded significant resources and focused attention from Genera's key personnel, thus impacting Genera's ability to complete the required preparations for the scheduled conference.

7. The additional days for filing Genera's presentation will enable it to compile, review, and verify all necessary data and information comprehensively. This thorough preparation is vital to ensure that the presentation that Genera provides is accurate, detailed, and beneficial for all parties involved in the Virtual Technical Conference.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes; **grant** Genera's request for extension, until June 19, 2024, to submit the workpapers for GenCo's FY 2025 Budget and the responses to the ROI outlined in Attachment A of the June 12th Resolution; and **grant** Genera's request for extension, until June 20, 2024, to submit the presentation for the Virtual Technical Conference.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of June 2024

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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: Alexis G. Rivera-Medina, at arivera@gmlex.net, and Mirelis Valle-Cancel, at mvalle@gmlex.net; and to LUMA, through its counsels of record: Margarita Mercado Echegaray, at margarita.mercado@us.dlapiper.com; Jan M. Albino López, at jan.albinolopez@us.dlapiper.com; and Julian Anglada Pagan, at julian.angladapagan@us.dlapiper.com.

In San Juan, Puerto Rico, this 17th day of June 2024.

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez