

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

<b>NEPR</b>  <b>Received:</b>  <b>Jun 18, 2024</b>  <b>7:46 AM</b>
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IN RE: REVIEW OF LUMA’S INITIAL BUDGETS

CASE NO.: NEPR-MI-2021-0004

SUBJECT: Joint Request for Continuance of Technical Conference and to Extend Time to Submit Presentations

**JOINT REQUEST FOR CONTINUANCE OF TECHNICAL CONFERENCE AND TO EXTEND TIME TO FILE PRESENTATIONS FOR THE TECHNICAL CONFERENCE**

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

COME NOW LUMA Energy, LLC (“ManagementCo”), and LUMA Energy ServCo, LLC (“ServCo”), (jointly referred to as “LUMA”), and Genera PR, LLC (“Genera”), through their respective counsels, and respectfully state and submit the following:

1. On May 24, 2024, LUMA submitted to the Puerto Rico Energy Bureau (“Energy Bureau”), the proposed budget for the Transmission and Distribution System (“T&D Budgets”), developed by LUMA. *See Request for Approval of T&D Budgets and Submission of GenCo Budgets for FY2025 and Budget Allocations for the Electric Power System*, filed by LUMA (“FY2025 Budget Submission”). The FY2025 Budget Submission also included the budget proposal for the legacy thermal generation units (the “GenCo Budget”), developed by Genera, and the budget allocation approved by the Puerto Rico Public-Private Partnerships Authority (“P3A”) for the hydroelectric generating units and the public irrigation facilities (“HydroCo Budget”), and the allocation for the Puerto Rico Electric Power Authority (“PREPA”) and its subsidiaries (“HoldCo Budget”).

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

*Calendar* (“June 12<sup>th</sup> Order”), whereby it set a Procedural Calendar to consider the FY2025 Budget Submission.

3. In the June 12<sup>th</sup> Order, this Energy Bureau issued Requests for Information (“RFIs”) to LUMA and Genera and set a procedural calendar pursuant to which the parties were convened to a Technical Conference to be held on June 20, 2024 (“June 20<sup>th</sup> Technical Conference”). *See* June 12<sup>th</sup> Order, p. 3-4, and Attachment A. This Energy Bureau directed that responses to the RFIs were due on June 17, 2024, to wit, within three (3) business days. *See id.*, p.

4. In the June 12<sup>th</sup> Order, this Energy Bureau also granted the parties three (3) business days, until June 17, 2024, to submit the work papers that support the proposed T&D Budgets, and until June 18<sup>th</sup> to submit their presentations for the June 20<sup>th</sup> Technical Conference. *See id.*, p. 3.

4. On June 15, 2024, LUMA filed an *Informative Motion on LUMA’s Workpapers and Urgent Request for Extension*. Therein, LUMA informed that it had submitted all supporting work papers with the FY2025 Budget Submission. Regarding the RFIs, LUMA requested additional time, until June 19, 2024, to submit its responses. The latter request is pending adjudication.

5. LUMA’s and Genera’s personnel are simultaneously preparing for the Technical Conference, working to respond to their respective RFIs, as well as tending to their day-to-day responsibilities. It is therefore respectfully submitted that they require additional time to submit their presentations and responsibly appear before this Energy Bureau to discuss the FY2025 Budget Submission.

6. Preparing for an in-person appearance to defend and discuss the FY2025 Budget Submission demands time and careful preparation, particularly because the parties expect that, as it has done in prior years, this Energy Bureau will ask detailed and incisive questions on the

FY2025 Budget Submission. Therefore, to afford both LUMA and Genera a reasonable opportunity to prepare for the technical conference, and in furtherance of each party's procedural rights to defend, explain and support their respective budget submissions for FY2025, the parties hereby respectfully request that the Energy Bureau continue the Technical Conference to June 24, 2024 and set the date to file their presentations for June 21, 2024.

7. Considerations of procedural fairness counsel in favor of granting the continuance requested herein and affording the appearing parties additional time to prepare for a Technical Conference in this proceeding.

8. The appearing parties are mindful of the importance of the Energy Bureau's review of the FY2025 Budget Submission and have joined in this request in furtherance of said review process with the good faith understanding that the procedural schedule set forth in the June 12<sup>th</sup> Order is not reasonably sufficient to file responses to the RFIs and submit a presentation this week, while at the same time the parties prepare to appear at a Technical Conference on June 20<sup>th</sup>.

**WHEREFORE**, it is respectfully requested that the Energy Bureau **take notice** of the above, **set** the date to submit presentations for June 21, 2024, and **re-schedule** the Technical Conference to June 24, 2024.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 18<sup>th</sup> day of June, 2024

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau. We also certify that a copy of this motion will be notified to the Puerto Rico Electric Power Authority, through its attorneys of record: Mirelis Valle-Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net) and Alexis G. Rivera Medina, [arivera@gmlex.net](mailto:arivera@gmlex.net).



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