

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

**NEPR**

**Received:**

**Jun 18, 2024**

**12:33 AM**

**IN RE:** REVIEW OF LUMA'S INITIAL  
BUDGETS

**CASE NO.:** NEPR-MI-2021-0004

**MOTION FOR A ONE (1) DAY EXTENSION OF TIME TO COMPLY  
WITH THE JUNE 12<sup>TH</sup>, 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 May 17<sup>th</sup>, 2024, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") entered a *Resolution and Order* ("May 17<sup>th</sup> Order") whereby it asserted the following:

The Energy Bureau ORDERS PREPA, to respond within ten (10) business days of notification of this Resolution and Order, to the order contained in the December 8 Resolution, and submit, "a Detailed Plan with action items, expected result, responsible party(ies), and due dates needed to achieve the reduced headcount footprint and labor expenses, starting on July 1, 2024, to get the HoldCo Organization in line with both staffing levels and business operations that correctly correspond to its substantially downsized mandate and associated approved budgets as it was originally approved in the June 25 Resolution. A Monthly Status Update on the status of the defined actions and any added corrective actions needed to take to achieve the desired results by July 1, 2024, shall be submitted as well". Until the Energy Bureau indicates otherwise, PREPA is NOT relieved of the requirement to provide the required Monthly Status Update.

2. The deadline to comply with the May 17<sup>th</sup> Order was June 3<sup>rd</sup>, 2024. However, and due to a medical complication with the undersigned's pregnancy, a brief extension of time was requested.

3. On June 12<sup>th</sup> 2024, the Energy Bureau entered and notified a *Resolution and Order* ("June 12<sup>th</sup> Order") whereby it reached the following determination and entered, *inter alia*, the following orders:

- a. Established as the FY25 operating budget for the electric utility the amount of \$1.315850 billion, under the Budget Determination by the P3A.
- b. Ordered PREPA (HoldCo and HydroCo) to file its proposed FY25 budgets within three (3) business days.
- c. Ordered LUMA, Genera and PREPA to file within three (3) business days all workpapers and supporting material used to develop their respective FY25 budget proposals in native form with all formulas and links intact and any Excel spreadsheets provided unlocked.
- d. Ordered PREPA to provide, within three (3) business days, an appropriate response in compliance with the Energy Bureau's mandate in the Resolution and Order entered on December 8<sup>th</sup>, 2023 and May 17<sup>th</sup>, 2024, requiring the submission of "a Detailed Plan with action items, expected result, responsible party(ies), and due dates needed to achieve the reduced headcount footprint and labor expenses, starting on July 1, 2024, to get the HoldCo Organization in line with both staffing levels and business operations that correctly correspond to its substantially downsized mandate and associated approved budgets as it was originally approved in the June 25 Resolution - this plan should also include employee titles and associated salary and benefit expenses." (hereafter, the "Rightsizing Order")

4. On this same day, June 17<sup>th</sup>, 2024, PREPA filed its *Motion Submitting PREPA's FY 2025 Budget Proposals for HoldCo and HydroCo* in partial compliance with June 12<sup>th</sup> Order.

5. With regards to the Rightsizing Order, PREPA has been diligently working to gather the responsive information to file its motion in compliance with said order. However, there is still a particular matter, related to HoldCo's personnel, that has yet to be discussed. This, due to the fact that key employees from the Finance Department were absent from the office and, as such, the undersigned was not able to procure the necessary information to complete the motion in compliance with the Rightsizing Order.

6. Fortunately, all necessary PREPA personnel will be available tomorrow, June 18<sup>th</sup>, 2024. As such, a final, one (1) day extension of time until June 18<sup>th</sup>, 2024, is requested from this Honorable Bureau, to comply with the Rightsizing Order.

**WHEREFORE**, PREPA respectfully requests the Energy Bureau to Grant a brief extension of one (1) day, until **June 18<sup>th</sup>, 2024**, to fully comply with the June 12<sup>th</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 17<sup>th</sup> day of June 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](mailto:jfr@sbgblaw.com); Alejandro López Rodríguez, [alopez@sbgblaw.com](mailto:alopez@sbgblaw.com); Joaquín M. Lago González, [jlago@sbgblaw.com](mailto:jlago@sbgblaw.com); and at the following email addresses [legal@genera-pr.com](mailto:legal@genera-pr.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); and LUMA Energy LLC and LUMA Energy ServCo, LLC through Margarita Mercado Echegaray, [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); Julian Anglada Pagán, [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com).

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