

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

**NEPR**

**Received:**

**Jul 5, 2024**

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**IN RE:**

10 YEAR PLAN FEDERALLY FUNDED  
COMPETITIVE PROCESS

**CASE NO.:** NEPR-MI-2022-0005

**SUBJECT:** Request for Extension to Submit  
Response to Request for Information Issued on  
June 21, 2024

**REQUEST FOR EXTENSION TO SUBMIT RESPONSE TO REQUEST FOR  
INFORMATION ISSUED ON JUNE 21, 2024**

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

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsels of record, and respectfully submits and prays as follows:

1. On January 23, 2023, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (“Energy Bureau”) entered an order with the subject *Determination for the Project Application Package for the Seven (7) Additional Peakers to be used as Generation* (“January 23<sup>rd</sup> Order”). In this order, among other directives, the Energy Bureau provided PREPA the flexibility to consider the best mix of locations for emergency generation. However, the Energy Bureau reminded PREPA that the total MW quantity of emergency generation and black start capacity procurement is limited by the conditions included in the December 5, 2022, Resolution and Order (“December 5<sup>th</sup> Order”).

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<sup>1</sup> 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 (“P3 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.

2. On November 8, 2023, the Energy Bureau entered an order with the subject *Motion to Submit Supplement to September 8, 2023 Motion in Compliance with Resolution and Order Dated August 23, 2023 - Genera Competitive Procurement of Black Start and Emergency Generation*. In this Order the Energy Bureau stated that the upper limit of the range of capacity (MW) sizing included in section A.1.2 of exhibit J of the RFP far exceeds the maximum of 200 MW of emergency generation and 81 MW of net plant output for black start services approved by the Energy Bureau in the December 5<sup>th</sup> Order and the January 23<sup>rd</sup> Order.

3. On June 5, 2024, Genera submitted a document titled *Motion to Submit the Grid Support Units Update Evaluation for the Emergency Generation and Black-Start Generation Procurement in compliance with the Resolution and Order dated January 23, 2023* (“June 5<sup>th</sup> Motion”), whereby Genera included, as Exhibit A, an evaluation titled Grid Support Units Project Update (“GSUPU”), submitted under seal of confidentiality, which reviewed competitive bid proposals received and, among other considerations, focused on optimizing the purchasing process by evaluating the benefits of reconfiguring locations and varying the sizes of units.

4. Through the June 5<sup>th</sup> Motion, Genera sought approval from the Energy Bureau to continue with the proposed equipment configuration and purchase of the grid support units as set forth in Exhibit A to the June 5<sup>th</sup> Motion.

5. On June 17, 2024, Genera submitted a document titled *Memorandum of Law in Support of Confidential Treatment of the Grid Support Units Update Evaluation Submitted on June 5, 2024*, whereby it requested the Energy Bureau to maintain the confidentiality of the GSUPU submitted as Exhibit A to the June 5<sup>th</sup> Motion.

6. On June 21, 2024, the Energy Bureau issued a Resolution and Order titled *Motion to Submit the Grid Support Units Update Evaluation – Requests for Information (ROI)* (“June 21<sup>st</sup>”

Resolution”), through which the Energy Bureau informed that they were evaluating the submitted information and had identified the need for further clarification and additional details. Consequently, the Energy Bureau ordered Genera to submit a response to the Second Request for Information, outlined in Attachment A to the June 21<sup>st</sup> Resolution, no later than ten (10) business days after the June 21<sup>st</sup> Resolution, with the deadline being July 8, 2024.

7. Genera respectfully requests an extension of time to submit responses to the Second Request for Information outlined in Attachment A to the June 21<sup>st</sup> Resolution. Due to the comprehensive nature and the intricate level of detail required in the requested responses, Genera has determined that the originally stipulated timeframe is insufficient to provide the thorough and accurate information necessary. Therefore, in the interest of delivering a fully compliant submissions that meet the Energy Bureau's expectations, Genera requests an extension of the deadline until Wednesday, July 10, 2024. This additional time will allow Genera to adequately address all queries and provide a comprehensive and well-substantiated response, ultimately facilitating a more effective evaluation process by the Energy Bureau.

8. Genera assures the Energy Bureau that this request for an extension is made in good faith. Genera’s commitment to compliance and transparency remains steadfast, and this request reflects Genera’s dedication to providing accurate and thorough responses.

**WHEREFORE**, for the reasons stated above, Genera respectfully requests the Energy Bureau to **take notice** of the above and **grant** Genera’s request for extension, until July 10, 2024, to submits its response to the Second Request for Information outlined in Attachment A to the June 21<sup>st</sup> Resolution.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 5<sup>th</sup> day of July 2024.

**ECIJA SBGB**

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TSPR 9,669

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TSPR 22,996

## CERTIFICATE OF SERVICE

We 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 we will send an electronic copy of this motion to PREPA through its counsels of record, Alexis G. River Medina, at [arivera@gmlex.net](mailto:arivera@gmlex.net), and Mirelis Valle Cancel at [mvalle@gmlex.net](mailto:mvalle@gmlex.net).

In San Juan, Puerto Rico, this 5<sup>th</sup> day of July 2024.

*/s/ Alejandro López-Rodríguez*  
Alejandro López-Rodríguez