

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

**NEPR**

**Received:**

**Jul 23, 2024**

**5:30 PM**

**IN RE:** IMPLEMENTATION OF THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY INTEGRATED RESOURCE  
PLAN AND MODIFIED ACTION PLAN

**CASE NO.:** NEPR-MI-2020-0012

**MOTION FOR EXTENSION OF TIME TO COMPLY WITH  
THE JULY 3<sup>RD</sup> 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 7<sup>th</sup>, 2024, PREPA filed a "Motion to Submit Additional Energy Storage Service Agreements (ESSAs) for the Energy Bureau's Approval" with the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau"). Through the motion, PREPA presented two additional ESSAs related to Tranche #1 and sought the Energy Bureau's approval.

2. On July 3<sup>rd</sup>, 2024, the Energy Bureau issued a Resolution and Order in the instant case, requiring PREPA to submit certain documents and information within twenty (20) days of notification of the Resolution and Order (July 3<sup>rd</sup> Order).

3. PREPA respectfully requests an extension until August 2, 2024, to comply with the July 3<sup>rd</sup> Order. PREPA and its consultants are currently evaluating all the information to be submitted to the Energy Bureau. However, this evaluation

has not been completed, and due to the upcoming holidays, PREPA respectfully requests an extension until August 2<sup>nd</sup> to submit PREPA's responses.

**WHEREFORE**, PREPA respectfully requests the Energy Bureau to **GRANT** the requested extension **until August 2<sup>nd</sup>, 2024**, to comply with the July 3<sup>rd</sup> Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 23<sup>rd</sup> day of July 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>, and courtesy copies were sent via e-mail to LUMA Energy, LLC through its counsels of record at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com), [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com), [laura.rozas@dlapiper.com](mailto:laura.rozas@dlapiper.com), [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com) and to Genera PR, LLC through its counsels of record at [jfr@sbgblaw.com](mailto:jfr@sbgblaw.com), [alopez@sbgblaw.com](mailto:alopez@sbgblaw.com).

**GONZÁLEZ & MARTÍNEZ**

1509 López Landrón  
Seventh Floor  
San Juan, PR 00911-1933  
Tel.: (787) 274-7404

**s/ Alexis G. Rivera Medina**

**Alexis G. Rivera-Medina**

TSPR No.: 18,747

E-mail: [arivera@gmlex.net](mailto:arivera@gmlex.net)