

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

**NEPR**  
**Received:**  
**Aug 13, 2024**  
**4:40 PM**

IN RE: PLAN PRIORITARIO PARA LA  
ESTABILIZACIÓN DE LA RED  
ELÉCTRICA

Case No.: NEPR-MI-2024-0005

Matter: Request for Partial Modification of  
Scheduling Order

**MOTION REQUESTING PARTIAL MODIFICATION OF SCHEDULING ORDER**

**TO THE ENERGY BUREAU:**

COMES NOW, GENERA PR, LLC (“Genera”), through its undersigned counsel and, very respectfully, states and prays as follows:

1. The Puerto Rico Energy Bureau (“PREB”) entered a *Resolution and Order* on August 9, 2024, setting forth a work schedule in the present case (“Scheduling Order”). The *Scheduling Order* features the following deadlines and events in the month of September 2024:

- **September 9, 2024:** Deadline for filing of Luma’s, Genera’s and PREPA’s presentations for the Virtual Technical Workshop.
- **September 11, 2024:** Virtual Technical Workshop with Luma, Genera, PREPA and stakeholders.
- **September 25, 2024:** Deadline for filing any revised and/or additional information required by the Energy Bureau.

2. As informed through an email dated July 30, 2024, Genera’s Chief Regulatory Officer, Katuska Bolaños-Lugo, Esq., will be outside of the jurisdiction during the period of September 9-17, 2024, tending to previously scheduled commitments. Consequently, she is unable

to participate in the Virtual Technical Workshop currently scheduled for September 11, 2024, even if conducted through remote means.

3. Ms. Bolaños-Lugo had a leading role in the preparation of the *Preliminary Plan* submitted on July 8, 2024, and will have an equally significant participation in its execution. Thus, her participation in the Virtual Technical Workshop is of a pivotal importance. The purpose of the Workshop, and the communications with stakeholders, will be better served by her participation in the event.

4. Accordingly, Genera respectfully requests that the Virtual Technical Workshop be rescheduled for a date after September 17, 2024. Genera proposes the following dates in September: September 18, 2024; September 23-25, 2024. Genera also requests that the deadline to submit any revised and/or additional information required by the PREB be rescheduled to a date fifteen (15) days after the Virtual Technical Workshop is held.

5. Genera hereby certifies that this request is made in good faith, based on the previously announced unavailability of a key member of Genera's team, and will not significantly alter the work schedule and execution timeline for the preliminary plans submitted by Luma, Genera and PREPA.

6. Alternatively, if the Virtual Technical Workshop cannot be rescheduled in its entirety, Genera respectfully asks that its plan be discussed through a separate Virtual Technical Workshop, on one of the dates proposed above.

WHEREFORE, Genera respectfully requests the Energy Bureau to GRANT this Motion and, accordingly:

- (i) reschedule the Virtual Technical Workshop for one the following dates: September 18, 2024; September 23-25, 2024. Genera also requests that the deadline to submit

any revised and/or additional information required by the PREB be rescheduled to a date fifteen (15) days after the Virtual Technical Workshop is held.

- (ii) Alternatively, if the Virtual Technical Workshop cannot be rescheduled in its entirety, Genera respectfully asks that its plan be discussed through a separate Virtual Technical Workshop, on one of the dates proposed above, and that the deadline to submit any revised and/or additional information required by the PREB be rescheduled to a date fifteen (15) days after the Virtual Technical Workshop is held.

In San Juan, Puerto Rico, this August 13th, 2024.

It is hereby certified that this motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case: Lcdo. **Alexis Rivera**, [arivera@gmlex.net](mailto:arivera@gmlex.net); **Lcda. Luara T. Rozas**, [laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com); **Lcda. Valeria Belvis Aquino**, [valeria.belvis@us.dlapiper.com](mailto:valeria.belvis@us.dlapiper.com)

**ROMAN NEGRÓN LAW, PSC**  
Attorneys for Genera PR, LLC.  
Citi Towers, Suite 1401  
252 Ponce de León Ave.  
San Juan, PR 00918  
P.O. Box 360758  
San Juan, PR 00936  
Tel. (787) 979-2007

*s/Luis R. Román Negrón*  
Luis R. Román Negrón  
RUA 14,265  
[lrn@roman-negron.com](mailto:lrn@roman-negron.com)