

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

<b>NEPR</b>  <b>Received:</b>  <b>Aug 14, 2024</b>  <b>8:34 PM</b>
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**IN RE:**

10 YEAR PLAN FEDERALLY FUNDED  
COMPETITIVE PROCESS

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

**SUBJECT:** Urgent Request for Extension of  
Deadlines Following Tropical Storm Ernesto

**URGENT REQUEST FOR EXTENSION OF DEADLINES FOLLOWING  
TROPICAL STORM ERNESTO**

**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 counsel of record, and respectfully state and request the following:

1. Genera hereby respectfully submits to the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) this urgent request for an extension until Monday, August 19, 2024, for all deadlines due for the week ending August 16, 2024. The declaration of Tropical Storm Ernesto as an emergency on August 13, 2024, shifted Genera's priorities, placing emergency preparation at the top of the list. This situation compelled the immediate redeployment of personnel from various departments to the Emergency Operations Center ("EOC"), as established in Genera's Emergency Response Plan, to engage in critical preparation, response and recovery efforts.

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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, 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 the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

2. Genera has had to prioritize activities to prepare for the effects of Tropical Storm Ernesto, as well as the logistics to maintain the Legacy Generation Assets in operations during the impact of the storm and the operation of the fleet in the aftermath, in coordination with the T&D System Operator to initiate blackstart processes and ensure the general transmission of power to customers. This has necessitated the redirection of essential resources away from regular tasks, impairing Genera's ability to adhere to established regulatory reporting deadlines without compromising the quality and thoroughness of the submissions.

3. Given these extraordinary circumstances, Genera urgently requests that the Energy Bureau grant an extension for all reporting and compliance obligations due this week ending August 16, 2024, until Monday, August 19, 2024. This extension is imperative to enable Genera's personnel to focus on urgent relief and recovery operations and ensure that, once normal activities are resumed, the integrity of Genera's compliance reporting is maintained without degradation.

4. This request is made in good faith, driven by the dual obligations of effectively supporting community-wide emergency response initiatives and fulfilling Genera's regulatory responsibilities. Genera firmly believes that approving this extension serves the best interests of all stakeholders, ensuring the continuation of essential emergency services without interruption and guaranteeing that the compliance data submitted post-extension meets the highest standards of accuracy and detail.

**WHEREFORE**, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **grant** Genera's urgent request for an extension until Monday, August 19, 2024, to submit all pending reports and responses under the referenced docket due this week ending August 16, 2024.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 14<sup>th</sup> day of August 2024.

**ECIJA SBGB**

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/s/ Jorge Fernández-Reboredo

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## 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 14<sup>th</sup> day of August 2024.

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

