

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

<b>NEPR</b>
<b>Received:</b>
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**IN RE:**

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

**SUBJECT: Request for Extension of Time to Comply with Resolution and Order of August 9, 2024**

**REQUEST FOR EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND ORDER OF  
AUGUST 9, 2024**

**TO THE PUERTO RICO ENERGY BUREAU:**

**COMES NOW, LUMA ENERGY SERVCO, LLC (“LUMA”)**, through the undersigned legal counsel and respectfully states and requests the following:

1. On May 14, 2019, this Puerto Rico Energy Bureau (“Energy Bureau”) issued a Resolution and Order requiring the Puerto Rico Electric Power Authority (“PREPA”) to submit quarterly reports on specified System Data.
2. Pursuant to Section 5.6 of the Puerto Rico Transmission and Distribution System Operation and Maintenance Agreement (“T&D OMA”), LUMA, as an agent of PREPA, submits System Data regarding the Transmission and Distribution System (“T&D System”).
3. On July 22, 2024, LUMA submitted System Data for the months of April through June. *See Submission of Quarterly Report on System Data for April through June 2024 (“July 22<sup>nd</sup> Motion”).*
4. On August 9, 2024, the Energy Bureau issued a Resolution and Order with the subject *Response to LUMA’s Submission of Performance Metrics Report for April through June 2024 (“August 9<sup>th</sup> Order”)* ordering LUMA to respond, within fourteen (14) days calendar days from the notification of the August 9<sup>th</sup> Order, to requests for information included in Attachment

A of the August 9<sup>th</sup> Order (“August 9<sup>th</sup> RFIs”). Thus, LUMA must submit responses to the August 9<sup>th</sup> RFIs, on or before August 23, 2024.

5. LUMA respectfully requests additional time, until August 30, 2024, to submit its responses to the August 9<sup>th</sup> RFIs.

6. As this Energy Bureau is aware, the passage near Puerto Rico of Tropical Storm Ernesto on August 13<sup>th</sup> and 14<sup>th</sup>, 2024, required that LUMA deploy a significant proportion of its workforce to address storm preparation, response and restoration of the electric grid. Efforts to compile and review the data requested in August 9<sup>th</sup> RFIs were delayed given that LUMA personnel, including personnel in charge of maintaining and compiling data needed to respond to the August 9<sup>th</sup> RFIs, were deployed as part of LUMA’s emergency response. At the time of this filing, LUMA’s *Emergency Operations Center* (LEOC) is still activated and thus, key personnel are attending power restoration and emergency management after the passage of Tropical Storm Ernesto.

7. The additional time requested herein will allow LUMA personnel to finalize work in LEOC operations, return to their non-emergency duties and be in position to finalize the responses to the August 9<sup>th</sup> RFIs. LUMA respectfully submits that this extension is the minimum necessary to complete this effort and should not unreasonably delay this proceeding. LUMA restates its commitment to comply with the August 9<sup>th</sup> Order.

**WHEREFORE**, LUMA respectfully requests that this Honorable Bureau **take notice of** the aforementioned; and **grant** LUMA’s request for an extension of time until August 30, 2024, to submit its response to the August 9<sup>th</sup> RFIs.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 21<sup>st</sup> day of August 2024.

We hereby certify that we filed this motion using the electronic filing system of this Energy Bureau and that we will send an electronic copy of this motion to PREPA's counsel of record, Alexis Rivera Medina, arivera@gmlex.net and Mirelis Valle Cancel, mvalle@gmlex.net, and Genera PR LLC, through its counsel of record Jorge Fernández-Reboredo, jfr@sbgblaw.com and Alejandro López Rodríguez, alopez@sbgblaw.com, and the Independent Consumer Protection Office, Hannia Rivera Diaz, hrivera@jrsp.pr.gov.



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