

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

**NEPR**

**Received:**

**Sep 13, 2024**

**5:17 PM**

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

Case No.: NEPR-MI-2024-0005

Motion in Compliance with Order of  
September 11, 2024

**MOTION IN COMPLIANCE WITH ORDER OF SEPTEMBER 11, 2024**

**TO THE ENERGY BUREAU:**

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

1. On June 13, 2024, the Puerto Rico Energy Bureau (“PREB”) issued a *Resolution and Order* instructing the Puerto Rico Electric Power Authority (“PREPA”), LUMA Energy, LLC and Luma Energy ServCo, LLC (“LUMA”), and Genera PR LLC (“Genera”), to elaborate and present to the PREB their respective Electric System Stabilization Plans (“Preliminary Plan”). Genera presented its *Preliminary Plan* on July 8, 2024.

2. On August 9, 2024, PREB issued another Resolution and Order titled *Establishment of Procedural Calendar*, setting forth a work schedule in the present case (“*Scheduling Order*”). Pursuant to the *Scheduling Order*, a Virtual Technical Workshop (“Workshop”) was held on September 11, 2024.

3. On September 11, 2024, during the Virtual Technical Workshop, the PREB ordered Genera to present a complete version of the presentation used. Genera explained that both the presentation used during the Workshop, and the one presented to the PREB on September 9, 2024, were one and the same. Genera explained that the difference in page numbers was due to the presentation animations used during the Workshop. Such animations were not visible in the hardcopy version of the presentation filed on September 9, 2024. The PREB nevertheless ordered

Genera to present a copy of the presentation containing all the graphics shown during the Virtual Technical Workshop.

4. As explained during the Workshop, the only features not fully illustrated in the copy filed on September 11, 2024, were the graphics shown on slide 12 of the presentation.

5. In compliance with the PREB's Order, Genera hereby submits a copy of slide 12 of the presentation, with the three graphics that appeared in the animated version of the presentation.

WHEREFORE, Genera respectfully requests the PREB to take notice of the foregoing, accept the revised slide 12 of the presentation, and deem Genera in compliance with the order given on September 11, 2024.

In San Juan, Puerto Rico, this 13th day of September, 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. Laura 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).

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Exhibit 1 – Revised Slide 12

# Genera's Stabilization 2 Year Plan

## 2025- 2027 Forecast Capacity Improvements

