

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

NEPR

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

Case No.: NEPR-MI-2024-0005

Matter: Motion in Partial Compliance with
Resolution and Order of December 5, 2024

**MOTION IN PARTIAL COMPLIANCE WITH RESOLUTION AND ORDER OF
DECEMBER 5, 2024 AND FOR EXTENSION OF TIME TO COMPLY WITH ITEMS 8
AND 12 OF THE REQUEST OF INFORMATION**

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”).

2. On July 8, 2024, Genera filed a motion through which it presented its *Preliminary Plan*. On July 11, 2024, the PREB acknowledged receipt of Genera’s *Preliminary Plan* and noted that the document met the basic expectations of the PREB.

3. On December 5, 2024, the PREB issued another *Resolution and Order* stating that “[u]pon review of the filings, the Energy Bureau has determined that additional information is required to conduct a thorough evaluation of the stabilization plans submitted.” (“December 5 Order”). Accordingly, the PREB ordered PREPA, Genera and Luma to respond to a Request of Information (“ROI”) that was attached to the *Resolution and Order*.

4. In compliance with the December 5 Order, Genera hereby submits its responses to the following items of the ROI: Items 1-7, 9-11 and 13, 15, 16.

5. Although Genera made its best efforts to fully comply with the December 5 Order, it could not complete its responses to items 8, 12, 14(a). Genera respectfully requests an extension until January 8, 2025, to complete these two items.

WHEREFORE, Genera respectfully requests the PREB to take notice of the foregoing and (1) deem Genera in partial compliance with the December 5 Order; and (2) grant an extension of time until January 8, 2025, for Genera to complete its responses to items 8, 12, and 14(a) of the relevant portions of the ROI.

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; **Lcda. Mirellis Valle**, mvalle@gmlex.net; **Lcda. Laura T. Rozas**, laura.rozas@us.dlapiper.com; **Lcda. Margarita Mercado**, margarita.mercado@us.dlapiper.com.

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