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

IN RE: INVESTIGACIÓN DEL TRAMO 1 ("TRANCHE 1") DE PROYECTOS DE ENERGÍA RENOVABLE Y ALMACENAMIENTO **CASE NO.**: NEPR-IN-2023-0002

**SUBJECT**: Motion for Additional Extension of Time to File Memorandum of Law in Support of Confidential Treatment of Exhibit 1 Submitted on May 2, 2024

# MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF EXHIBIT 1 SUBMITTED ON MAY 2, 2024

#### TO THE HONORABLE ENERGY BUREAU:

COME NOW LUMA Energy ServCo, LLC and LUMA Energy, LLC (collectively "LUMA") through their undersigned legal counsel and respectfully submit and request the following:

- 1. On May 2, 2024, LUMA filed a *Motion in Compliance with Resolution and Order* from March 19, 2024, and Request for Confidential Treatment ("May 2<sup>nd</sup> Motion") and requested the confidential treatment of *Exhibit* 1 to the May 2<sup>nd</sup> Motion ("May 2<sup>nd</sup> Exhibit 1"). In the May 2<sup>nd</sup> Motion, LUMA stated that pursuant the Energy Bureau's Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, and partially amended on September 16, 2016, it would be submitting within the next ten (10) days a Memorandum of Law in support of the request for confidential treatment of the May 2<sup>nd</sup> Exhibit 1.
- 2. On May 13, 2024, the undersigned requested an extension of five (5) days to complete the Memorandum of Law, given the extensive amount of documents comprising the May

2<sup>nd</sup> Exhibit 1. See Motion for Extension To File Memorandum of Law In Support of Confidential Treatment of Exhibit 1 Submitted on May 2, 2024 filed on May 13, 2024.

2. The undersigned hereby informs that it is still in the process of analyzing the confidentiality of the May 2<sup>nd</sup> Exhibit 1 documents, which comprise more than 100 documents, and preparing the mentioned Memorandum of Law and that, despite the undersigned's best efforts, it has taken more time than anticipated to complete this process. It is anticipated that this effort may be completed within the next week. Therefore, an additional extension of one week is requested in good faith to thoroughly compete this process. It is respectfully submitted that, taking into account that the documents in the May 2<sup>nd</sup> Exhibit 1 are to be maintained confidential during and until the end of the referenced investigation (*see* Section 15.10 of the Energy Bureau's Regulation 8543, known as the *Regulation on Adjudicative Procedures, Notices of Noncompliance, Rate Review and Investigations*), this brief extension should not have an impact in the proceedings.

**WHEREFORE**, it is respectfully requested that this honorable Energy Bureau grant an extension of one week to file the Memorandum of Law in support of the request for confidential treatment of Exhibit 1 to the *Motion in Compliance with Resolution and Order from March 19*, 2024, and Request for Confidential Treatment filed on May 2, 2024.

#### RESPECTFULLY SUBMITTED.

We hereby certify that this motion was filed using the electronic filing system of this Energy Bureau.

In San Juan, Puerto Rico, this 19th of May 2024.



## **DLA Piper (Puerto Rico) LLC**

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