

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

NEPR

Received:

Jan 24, 2025

7:17 PM

IN RE:

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY'S 10-
YEAR INFRASTRUCTURE PLAN –
DECEMBER 2020

CASE NO.: NEPR-MI-2021-0002

SUBJECT: Urgent Request for Extension to
Submit Response to the Resolution and Order
dated January 14, 2025

**URGENT REQUEST FOR EXTENSION TO SUBMIT RESPONSE TO THE
RESOLUTION AND ORDER DATED JANUARY 14, 2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”), through its counsels of record, and respectfully submits and prays as follows:

1. On November 4, 2024, Genera filed a document with the Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) titled *Motion Submitting Seven (7) Scope of Works in Connection with Genera's FY2025 NME Budget Reallocation Request* (“November 4th Motion”). Through the November 4th Motion, Genera included, as Exhibit A, seven (7) Scope of Works (“SOWs”) covering fifteen (15) NME projects that Genera attributes Federal Funding.

2. On November 27, 2024, Genera filed a document titled *Motion Submitting Nine Scope of Works in Connection with Genera's FY2025 NME Budget Reallocation Request* (“November 27th Motion”). In the November 27th Motion, Genera provided, as Exhibit A, the remaining required SOWs for NME projects not yet submitted for evaluation by the Energy Bureau, and for which Genera attributes Federal Funding.

3. On January 14, 2025, the Energy Bureau issued a Resolution and Order titled *Resolution and Order for the Scope of Works (SOWs) of twenty-three (23) Projects in Connection with Genera's FY2025 NME Budget Reallocation Request* ("January 14th Motion"). In the January 14th Resolution, the Energy Bureau noted that Genera had provided SOWs for a total of twenty-five (25) projects attributed to federal funding, grouped into seven (7) SOWs submitted with the November 4th Motion and nine (9) SOWs with the November 27th Motion. The November 27th Motion also included a reference table as Exhibit B, listing which NME project Genera attributes federal funding. Additionally, the November 27th Motion reused five (5) SOWs submitted in the November 4th Motion, excluding the SOWs for Mayagüez and San Juan. The Energy Bureau expressed concerns about a missing SOW for a repair activity at San Juan Plant (LTSA Units 5 & 6), which Genera had previously identified as federally funded, and requested clarification on the status of this activity, along with confirmation whether it remains federally funded project and a timeline for submission of the relevant SOW.

4. Consequently, in the January 14th Resolution, the Energy Bureau (i) ordered Genera to clarify the status of project No. 7 of the September 23rd Motion; (ii) ordered Genera to clarify the funding status for NME projects No. 23 and No. 43, as approved by the Energy Bureau in the October 28th Resolution; (iii) denied the SOWs included in Attachment B of the January 14th Resolution for absence of information required for an approval request, which is a cost estimate of the SOW and (iv) ordered Genera to submit, within ten (10) days of the notification of the January 14th Resolution, an estimated cost distribution.¹

1. Since receiving the January 14th Resolution, Genera has worked diligently to compile and verify the requisite information for each of the identified projects. However, the ten-

¹ See January 14th Resolution, p. 3.

day deadline set by the Energy Bureau, along with the intricate nature of these resource-intensive undertakings, warrants additional time to coordinate and finalize cost estimates. A brief extension will enable Genera to complete ongoing data validations, incorporate feedback from relevant project managers and contractors, and avoid piecemeal or preliminary filings. This will help ensure a comprehensive and reliable submission, thereby assisting the Energy Bureau in its review and oversight responsibilities.

2. In light of the above, Genera respectfully requests a ten (10) day extension, until February 3, 2025, to finalize all required responses, clarifications, and cost estimates. Allowing this additional time will not prejudice any party or unnecessarily delay these proceedings; on the contrary, it will assist in ensuring that the Energy Bureau has all pertinent information necessary to evaluate the funding status, cost distribution, and technical merits of the relevant NME projects.

WHEREFORE, Genera respectfully requests that this Energy Bureau **take notice** of the above for all purposes and **grant** Genera an extension of time of ten (10) days, until February 3, 2025, to provide its response to the January 14th Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24th day of January of 2025.

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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 the PREPA's counsel, Mirelis Valle Cancel, at mvalle@gmlex.net, and Alexis Rivera, at arivera@gmlex.net; and to LUMA's counsel, Margarita Mercado, at margarita.mercado@us.dlapiper.com, and Yahaira De La Rosa, at yahaira.delarosa@us.dlapiper.com.

In San Juan, Puerto Rico, this 24th day of January 2025.

/s/ Alejandro López-Rodríguez
Alejandro López-Rodríguez

