

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

**NEPR**

**Received:**

**May 15, 2025**

**11:12 AM**

**IN RE:** REQUEST FOR CERTIFICATION  
BY LIGUETO OPERATING PR SA LLC

**CASE NO.:** NEPR-CT-2024-0012

**SUBJECT:** Financial Statements

**MOTION TO REQUEST CONFIDENTIAL TREATMENT  
OF FY2024 FINANCIAL STATEMENTS**

**TO THE HONORABLE ENERGY BUREAU:**

**COMES NOW**, Ligueto Operating PR SA LLC ("Ligueto"), represented by the undersigned legal counsel, and respectfully submits the following:

1. Section 4.02(E) of the *Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico, Regulation 8701 of the 17th of February 2016*, as amended ("Regulation 8701"), requires electrical service companies whose gross revenue for a given fiscal are below three million dollars (\$3,000,000.00) to submit compiled financial statements within 120 days of the end of the company's fiscal year.
2. Ligueto hereby respectfully submits its compiled financial statements for fiscal year 2024 ("FY2024").
3. Ligueto requests that confidential treatment be afforded to this motion and its corresponding attachment. Section 6.15 of Act No. 57 of May 17, 2014, as amended, 22 LPRA § 1054n, provides:

If any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Bureau] to treat such information as such, subject to the following:

(a) If the Energy [Bureau], after the appropriate evaluation, believes such information should be protected, it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.

(b) To such purposes, the Energy [Bureau] shall provide access to the document or the privileged portion of the document only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.

(c) The Energy [Bureau] shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the Energy [Bureau] who needs to know such information under nondisclosure agreements. However, the Energy [Bureau] shall direct that a non-confidential copy be furnished for public review.

(d) The Energy [Bureau] shall swiftly act on any privilege and confidentiality claim made by a person subject to its jurisdiction by means of a resolution to such purposes before any allegedly confidential information is disclosed.

4. Ligueto respectfully requests that all the information contained in this motion and attached hereto be kept confidential in accordance with Section 1.15 of Regulation 8701. In compliance with the process to designate confidential information, Ligueto hereby includes redacted versions of the documents for which confidential treatment is sought (**Attachment 1**). These documents have sensitive information, otherwise not available to

the public, which Ligueto prefers not to disclose and that could place Ligueto at a competitive disadvantage. Moreover, Table 1 below contains a list of all the documents including information for which confidential treatment is requested.

**Table 1**

Document Name	Page	Date	Legal Basis	Discussion
<b>Independent Accountant's Compilation Report and Financial Statements (Attachment 1)</b>	Page 4-6	5/15/25	<ul style="list-style-type: none"><li>• Act No. 57-2014, § 6.15</li><li>• Regulation 8701, § 1.15</li></ul>	This document contains sensitive information which should not be available to the public. The disclosure of this information would place Ligueto at a competitive disadvantage with respect to other market participants and cause it economic harm.

5. Ligueto respectfully requests that this Honorable Energy Bureau only grant access to said information to internal Energy Bureau personnel, counsel, and consultants subject to the execution of a confidentiality agreement.

WHEREFORE, Ligueto Operating PR SA LLC respectfully requests that this Honorable Energy Bureau respectfully requests that the Honorable Energy Bureau take notice of its compiled financial statements for fiscal year 2024 and that confidential treatment be afforded to this motion and its corresponding attachments.

Respectfully submitted, on May 15, 2025, in San Juan, Puerto Rico.

**McCONNELL VALDÉS LLC**

Ligueto Operating PR SA LLC  
NEPR-CT-2024-0012  
Motion To Request Confidential Treatment  
of FY2024 Financial Statements  
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# **ATTACHMENT 1**

**LIGUETO OPERATING PR SA LLC**  
**INDEPENDENT ACCOUNTANTS' COMPILATION REPORT**  
**AND FINANCIAL STATEMENTS**

**DECEMBER 31, 2024**



# LIGUETO OPERATING PR SA LLC

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**VALDES, GARCIA, MARIN & MARTINEZ, LLP**  
CERTIFIED PUBLIC ACCOUNTANTS AND CONSULTANTS

**INDEPENDENT ACCOUNTANTS' COMPILATION REPORT**

To the Board of Directors of  
Ligueto Operating PR SA LLC

Management is responsible for the accompanying financial statements of Ligueto Operating PR SA LLC. (the Company), which comprise the balance sheet as of December 31, 2024 and the statement of operations and member's equity and cash flows for the year then ended, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP). We did not audit or review the financial statement nor were we required to perform any procedures to verify the accuracy or completeness of the information provided by management. We do not express an opinion, a conclusion, or provide any assurance on these financial statements.

Management has elected to omit substantially all disclosures required by U.S. GAAP. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the Company's financial position, results of operations, and cash flows. Accordingly, these financial statements are not designed for those who are not informed about such matters.

San Juan, Puerto Rico  
April 25, 2025

*Valdes, Garcia, Marin & Martinez, LLP*



[REDACTED]  
LIGUETO OPERATING PR SA LLC







