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

NEPR

Received:

May 26, 2025

10:03 AM

IN RE:

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Urgent Request for Extension of Time to Submit Revised Response to Request of Information Dated January 17, 2025.

URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT REVISED RESPONSE TO REQUEST OF INFORMATION DATED JANUARY 17, 2025

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera"), as agent of the Puerto Rico Electric

Power Authority ("PREPA"),¹ through its counsels of record, and respectfully submits and prays as follows:

1. On February 3, 2025, in compliance with the Energy Bureau of the Puerto Rico Public Service Regulatory Board's Resolution and Order dated January 17, 2025 ("January 17th Resolution"), Genera submitted a *Motion to Submit Response to Request of Information dated January 17, 2025.* With this motion, Genera submitted its responses to the Requests for Information ("ROIs") issued in the January 17th Resolution, along with an updated Quarterly Report for the second quarter of Fiscal Year 2025.

2. On May 16, 2025, the Energy Bureau issued a Resolution and Order ("May 16th Resolution") determinating that, upon reviewing Genera's initial submissions in response to the

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* ("LGA OMA"), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority ("P3 Authority"), Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

January 17th Resolution, revised responses were necessary. Consequently, and in relevant part to this Motion, the Energy Bureau ordered Genera to file revised responses to certain ROIs identified in the January 17th Resolution within ten (10) calendar days from notification of the May 16th Resolution.

3. In compliance with the May 16th Resolution, and in light of the comprehensive nature of the information required and the need to ensure accuracy and completeness in its response, Genera respectfully requests an extension of ten (10) additional days from the original due date of May 26, 2025—that is, until June 5, 2025—to submit its response to the January 17th Resolution ROIs, including the additional ROI's set forth in Attachment A of the May 16th Resolution, which are also due on June 5, 2025.

4. This request for an extension is made in good faith, reflecting Genera's commitment to thoroughness and compliance with regulatory expectations. Genera acknowledges the importance of timely and accurate reporting and seeks this extension as a necessary measure to ensure the quality and completeness of the information provided, especially in light of the recent emergency conditions.

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the above for all pertinent purposes and **grant** Genera's request for an extension of time until June 5th, 2025, to submit its revised response to the Request for Information dated January 17th, 2025, in compliance with the May 16tth Resolution.

RESPECTFULLY SUBMITTED.

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

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<u>/s/ Jorge Fernández-Reboredo</u> Jorge Fernández-Reboredo jfr@sbgblaw.com TSPR 9,669

CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to <u>margarita.mercado@us.dlapiper.com</u>, <u>Yahaira.delarosa@us.dlapiper.com</u>; <u>mvalle@gmlex.net</u>; <u>arivera@gmlex.net</u>, and <u>hrivera@jrsp.pr.gov</u>, and I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau.

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

<u>/s/ Jorge Fernández-Reboredo</u> Jorge Fernández-Reboredo