

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

**NEPR**

**Received:**

**Jun 9, 2025**

**7:46 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:** Motion to Inform the Filing of  
Motion to Show Cause Why Sanctions  
Should Not Be Imposed in Compliance with  
the May 30th Order and Request for  
Reconsideration, in Case No. NEPR-MI-  
2024-0004.

**MOTION TO INFORM THE FILING OF MOTION TO SHOW CAUSE WHY  
SANCTIONS SHOULD NOT BE IMPOSED IN COMPLIANCE WITH THE MAY  
30TH ORDER AND REQUEST FOR RECONSIDERATION, IN CASE NO. NEPR-  
MI-2024-0004**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW GENERA PR LLC** (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsels of record, and respectfully state and request the following:

1. On May 28, 2025, Genera filed a *Motion to Inform Commencement of Activities Pursuant to United States Department of Energy Order No. 202-25-1 for Fuel Swapping Conversion* (May 28<sup>th</sup> Motion), in the present docket, Case No. NEPR-MI-2021-0002, informing of the need to rehabilitate San Juan Units 8 and 10, Cambalache Unit 1, and to convert certain generating units to alternative fuel sources, in order to maintain grid

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<sup>1</sup> 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, 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 PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

reliability, comply with federal and state orders, and advance the energy public policy of both the federal and local governments.

2. Notwithstanding the above, on May 30, 2025, the Energy Bureau issued an *Order to Cease and Desist and to Show Cause* (“May 30<sup>th</sup> Order”), **in a different docket, Case No. NEPR-MI-2024-0004**, ordering Genera to show cause, within ten (10) days from the date of notification of said Order, as to why it should not be fined under Section 6.36 of Act 57-2014, known as the Puerto Rico Energy Transformation and RELIEF Act, as amended (“Act 57-2014”), for attempting to proceed with “unauthorized” fuel conversion activities and for misinterpreting the scope of the DOE Order to circumvent regulatory requirements.

3. In compliance with the May 30th Order, Genera hereby informs the Energy Bureau that on this date, June 9, 2025, it filed a Motion to Show Cause Why Sanctions Should Not Be Imposed in Compliance with the May 30th Order and Request for Reconsideration in Case No. NEPR-MI-2024-0004.

4. Genera files the present motion solely for informational purposes in the docket where the May 28th Motion was originally submitted, to ensure that the Energy Bureau is fully informed of the responsive filings made in Case No. NEPR-MI-2024-0004.

**WHEREFORE**, Genera respectfully requests that the Energy Bureau take notice of the foregoing for all relevant purposes and acknowledge the filing of the *Motion to Show Cause Why Sanctions Should Not Be Imposed in Compliance with the May 30th Order and Request for Reconsideration* in Case No. NEPR-MI-2024-0004.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 9<sup>th</sup> day of June 2025.

**ECIJA SBGB**  
PO Box 363068

San Juan, Puerto Rico 00920  
Tel. (787) 300-3200  
Fax (787) 300-3208

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo  
[jfr@sbgblaw.com](mailto:jfr@sbgblaw.com)  
TSPR 9,669

/s/ Jenisse M. Alvarez  
Jenisse M. Alvarez  
[jennalvarez@sbgblaw.com](mailto:jennalvarez@sbgblaw.com)  
TSPR 23,435

/s/ José Javier Díaz Alonso  
José Javier Díaz Alonso  
[jdiaz@sbgblaw.com](mailto:jdiaz@sbgblaw.com)  
TSPR 21,718

## 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 [arivera@gmlex.net](mailto:arivera@gmlex.net); [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [RegulatoryPREBOrders@lumapr.com](mailto:RegulatoryPREBOrders@lumapr.com); [laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [Yahaira.delarosa@us.dlapiper.com](mailto:Yahaira.delarosa@us.dlapiper.com); [julian.angladapagan@us.dlapiper.com](mailto:julian.angladapagan@us.dlapiper.com); [lionel.santa@prepa.pr.gov](mailto:lionel.santa@prepa.pr.gov); [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov); [javrua@sesapr.org](mailto:javrua@sesapr.org); [mrios@arroyorioslaw.com](mailto:mrios@arroyorioslaw.com); [jordgraham@tesla.com](mailto:jordgraham@tesla.com); [forest@cleanenergy.org](mailto:forest@cleanenergy.org); [customerservice@sunnova.com](mailto:customerservice@sunnova.com); [pjcleanenergy@gmail.com](mailto:pjcleanenergy@gmail.com); [agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com); [info@sesapr.org](mailto:info@sesapr.org); [cfl@mcvpr.com](mailto:cfl@mcvpr.com); and [mqs@mcvpr.com](mailto:mqs@mcvpr.com).

In San Juan, Puerto Rico, this 9<sup>th</sup> day of June 2025.

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo

/s/Jenisse M. Alvarez  
Jenisse M. Alvarez

/s/ José Javier Díaz Alonso  
José Javier Díaz Alonso