

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

NEPR

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**IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW**

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: Request for Short Extension of
Time to Spanish Language Summary of
LUMA's Motion Submitting Rate Review
Petition and Request for Confidential
Treatment of Portions of LUMA's Rate
Review Petition**

**REQUEST FOR SHORT EXTENSION OF TIME TO FILE SPANISH-LANGUAGE
SUMMARIES OF TWO PROCEDURAL MOTIONS**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On April 11, 2025, the Office of the Independent Consumer Protection Office (“OIPC”) filed a document titled *Solicitud de Accesibilidad a los Procesos a los Fines de Garantizar la Participación Ciudadana*, requesting that the Puerto Rico Energy Bureau (“Energy Bureau”) adopt a formal, comprehensive protocol to ensure that consumers whose dominant language is Spanish can fully understand and participate in the proceeding.

2. On May 9, 2025, the Honorable Energy Bureau of Puerto Rico (“Energy Bureau”) issued a *Resolution and Order* addressing the OIPC’s request (“May 9th Order”), whereby it detailed the bilingual measures already in place, including the provision of live, simultaneous interpretation services between Spanish and English at all public hearings, the ability for participants to file documents and speak in either language without disadvantage, and the requirement that all public notices be issued in both Spanish and English.

3. Moreover, in response to the OIPC's request for greater accessibility, the Energy Bureau established a new requirement: all parties submitting documents containing substantive content in English must include a concise summary in Spanish *as part of the same filing*. See May 9th Order at p. 2, Section II(B).

4. On May 21, 2025, LUMA filed a *Request for Partial Reconsideration of the May 9th Order* ("May 21st Request"). Therein, LUMA expressed support for the goal of enhancing public participation but requested that the Energy Bureau amend its order to require full Spanish translations of substantive filings, rather than concise summaries. LUMA argued that full translations would provide greater clarity and avoid the risk of omitting critical information. Additionally, LUMA requested a five-business-day period for submitting translations following the original English filing.

5. On June 4, 2025, the Energy Bureau issued a Resolution and Order addressing LUMA's May 21st Request ("June 4th Order"). Through its June 4th Order, the Energy Bureau denied LUMA's request to replace the requirement for concise Spanish summaries with mandatory full translations of substantive English filings. The Energy Bureau clarified that while full translations may be submitted voluntarily within five business days of the original filing, concise Spanish summaries remain mandatory and must be filed concurrently with the English document.

6. Today, July 2nd, 2025, LUMA filed its *Motion Submitting Rate Review Petition*. In accordance with the Energy Bureau's May 9th Order, as modified by the June 4th Order, LUMA submitted Spanish summaries of i) its pre-filed testimonies, *see LUMA Ex. 1.0 through 20.0*; and ii) its Executive Summary, *see LUMA Exhibit 1.04*, all associated with its portion of the rate review application.

7. Notwithstanding LUMA's ongoing efforts to fully comply with the Energy Bureau's bilingual filing requirements, LUMA respectfully requests an extension of at least three (3) additional business days to file the Spanish summary of its procedural *Motion Submitting Rate Review Petition* ("Rate Review Petition"), *LUMA's Request for Confidential Treatment of Portions of LUMA's Rate Review Petition*, and *Request for Confidential Treatment of Portions of LUMA's Response to Requests of Information issued on March 24, 2025* ("Requests for Confidential Treatment"). The complexity and length of the *Rate Review Petition* filing package, render it impossible to file today summaries in Spanish of these procedural motions. Additional time is required to ensure that the Spanish summaries accurately and clearly convey the main points, conclusions, and specific requests of the aforementioned filings.

8. LUMA is committed to upholding the spirit and letter of the Energy Bureau's orders and to facilitating meaningful public participation by all stakeholders. The requested short extension will allow LUMA to prepare a high-quality Spanish summary that meets the Energy Bureau's standards and serves the interests of all parties involved

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **grant** LUMA's request for an extension of three (3) business days – to wit, on or before July 9, 2025 – to file the Spanish summaries of the *Rate Review Petition* and *Requests for Confidential Treatment*, in compliance with the Energy Bureau's May 9th Order, as modified by the June 4th Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of July, 2025.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to Hearing Examiner, Scott Hempling, shempling@scotthemplinglaw.com; and to the attorneys of the parties of record. To wit, to the **Puerto Rico Electric Power Authority**, through: Mirelis Valle-Cancel, mvalle@gmlex.net; Juan González, jgonzalez@gmlex.net; Alexis G. Rivera Medina, arivera@gmlex.net; and Juan Martínez,

jmartinez@gmlex.net; and to **Genera PR, LLC**, through: Jorge Fernández-Reboredo, jfr@sbgblaw.com; Gabriela Castrodad, gcastrodad@sbgblaw.com; Jennise Alvarez, jennalvarez@sbgblaw.com; regulatory@genera-pr.com; and legal@genera-pr.com; **Co-counsel for Oficina Independiente de Protección al Consumidor**, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; **Co-counsel for Instituto de Competitividad y Sustentabilidad Económica**, victorluisgonzalez@yahoo.com; agraitfe@agraitlawpr.com; **Co-counsel for National Public Finance Guarantee Corporation**, epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; robert.berezin@weil.com; Gabriel.morgan@weil.com; Corey.Brady@weil.com; **Co-counsel for GoldenTree Asset Management LP**, lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; iglassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; **Co-counsel for Assured Guaranty, Inc.**, hburgos@cabprlaw.com; dperez@cabprlaw.com; mmcgill@gibsondunn.com; lshelfer@gibsondunn.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; **Co-counsel for Syncora Guarantee, Inc.**, escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; **Co-Counsel for the PREPA Ad Hoc Group**, dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; david.herman@dechert.com; michael.doluisio@dechert.com; stuart.steinberg@dechert.com; **Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica**, nancy@emmanuelli.law; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; **Official Committee of Unsecured Creditors of PREPA**, jcasillas@cstlawpr.com; jnieves@cstlawpr.com; **Solar and Energy Storage Association of Puerto Rico**, Cfl@mcvpr.com; apc@mcvpr.com; javrua@sesapr.org; and **the Energy Bureau's Consultants**, jrinconlopez@guidehouse.com; Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; jorge@maxetaenergy.com; rafael@maxetaenergy.com; RSmithLA@aol.com; msdady@gmail.com; mcranston29@gmail.com; dawn.bisdorf@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; guy@maxetaenergy.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com.



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