

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

**NEPR**

**Received:**

**Jul 15, 2025**

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

**CASE NO. NEPR-MI-2020-0001**

**SUBJECT: Submission of FCA and PPCA  
Accelerated Reconciliation for June 2025 and  
Recalculated Factors for August and  
September 2025**

**MOTION SUBMITTING FCA AND PPCA ACCELERATED RECONCILIATION FOR  
JUNE 2025 AND RECALCULATED FACTORS FOR AUGUST AND SEPTEMBER 2025**

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

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

**I. Introduction**

As Operator of the Puerto Rico Electric Power Authority’s (“PREPA”) Transmission and Distribution System (“T&D System”), and in furtherance of its duties as agent of PREPA regarding system regulatory matters under Section 5.6 of the *Puerto Rico Transmission and Distribution Operation and Maintenance Agreement* (“T&D OMA”),<sup>1</sup> supplemented by the Puerto Rico Transmission and Distribution System Supplemental Terms Agreement, LUMA prepares quarterly reconciliations and proposed calculated factors for the Fuel Charge Adjustment (“FCA”), the Purchased Power Charge Adjustment (“PPCA”), and the Fuel Oil Subsidy (“FOS”) riders.

The FCA and PPCA Riders included in the Puerto Rico Electric Power Authority’s (“PREPA”) Tariff Book contemplate an accelerated adjustment clause if, after the completion of

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<sup>1</sup> PREPA, Puerto Rico Public-Private Partnerships Authority (“P3 Authority”) and LUMA, the *Puerto Rico Transmission and Distribution Operation and Maintenance Agreement* (June 22, 2020).

a monthly billing cycle, it is determined that the actual costs of purchase power and fuel costs deviate from the forecasted costs by more than \$20 million. In such cases, and if ordered by the Puerto Rico Energy Bureau (“Energy Bureau”), the factors of the FCA and PPCA clauses may be recalculated for the remainder of the quarterly period. If so, LUMA is required to recalculate the FCA and PPCA factors. This recalibration is performed to ensure that the adjustment factors are set at levels that will result in an expected net recovery of zero for the relevant quarterly period, thereby minimizing the risk of significant over- or under-recovery from customers.

The Final Rate Order of 2017, issued on January 10, 2017, Case CEPR-AP-2015-0001, as amended (“Final Rate Order”) and PREPA’s tariff book, require the calculation of the FCA and PPCA riders reconciliation to ensure that the costs the power purchased from private generators and of fuel used for generation by PREPA —now the responsibility of Genera PR, LLC (“Genera”)— are passed through to customers without any markup, profit or additional charges that would benefit PREPA. The reconciliation for the FCA and PPCA riders that are submitted herewith for June 2025 is consistent with the approved and currently existing PREPA Tariff Book and the Final Rate Order.

LUMA does not own or operate generation facilities, does not purchase any fuel for generation, and does not determine the impact that fuel costs have on customer rates. LUMA’s operational costs are not included in the FCA, PPCA, and FOS riders. LUMA is responsible for calculating the factors based on the information provided by Genera and other private generators every quarter, or earlier if the accelerated adjustment threshold is met. LUMA does not benefit financially from any change in fuel generation costs. Likewise, LUMA has no control over the price of fuel used for generation or how this fuel is used.

LUMA's submission also includes Excel spreadsheets filed publicly via email in a file entitled *Values* submitted with this Motion. With this motion, LUMA is submitting via email confidential Excel spreadsheets with formulae intact, submitted in a file entitled *Confidential*. As explained in Section IX *infra*, it is hereby respectfully requested that this Energy Bureau accept and maintain the files and spreadsheets submitted in the file, *Confidential*, under the seal of confidentiality.

## **II. Procedural Background**

Pursuant to orders entered in cases nos. CEPR-AP-2015-0001, NEPR-AP-2018-0003, and NEPR-MI-2020-001, the honorable Energy Bureau approves and revises the factors associated with several riders, including the FCA, PPCA, and FOS. These riders are reconciled and set quarterly.

On March 28, 2025, the Energy Bureau issued a Resolution and Order by which it resolved that it was necessary to create a reserve of \$110 million through the FCA to withhold the portion of the payment associated with the proposed amendment to the LGA OMA<sup>2</sup> for the relevant period. The reserve was established at \$40 million, corresponding to the period from March through June 2025, at a rate of \$10 million per month. The Energy Bureau expressly warned that these funds may not be disbursed until the Bureau has completed its evaluation of the proposed amendment, issued an amended certificate of compliance with Puerto Rico's public energy policy, among other conditions.

The total amount to be collected in connection with the proposed amendment is \$110 million, leaving a balance of \$70 million to be recovered through the FCA Clause in subsequent quarterly reconciliations. Accordingly, the Energy Bureau ordered LUMA to include in its

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<sup>2</sup> PREPA, Puerto Rico Public-Private Partnerships and Genera PR LLC, the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (Jan. 24, 2023).

forthcoming proposals for adjustment factors the corresponding reserve item associated with the amendment, at a rate of \$10 million per month, until the remaining \$70 million is fully recovered.

On May 31, 2025, LUMA filed a document titled Motion Submitting *CILTA, SUBA-HH, AND SUBA-NHH Reconciliations and Calculated Factors, EE Program Costs and Proposed Factors, and Request for Confidential Treatment of Excel Spreadsheets* (“May 31 Motion”). Through the May 31 Motion, LUMA presented its reconciliation and proposed factors for the annual adjustment clauses.

On June 16, 2025, LUMA filed a brief entitled *Motion Submitting FCA and PPCA Reconciliations for March Through May 2025 and Updated Annual Reconciliation and Submission of PCA, PPCA, and FOS and Annual Calculated Factors and Request for Confidential Treatment* (“June 16 Motion”). Through the June 16 Motion, LUMA presented its proposal for FCA, PPCA, and FOS factors to be implemented as of July 1, 2025, and the corresponding reconciliations. LUMA also submitted a revised version of the proposed annual factors submitted with the May 31 Motion. In the June 16 Motion, in compliance with the March 28 Order, LUMA submitted the costs and reconciliation associated with the LGA OMA amendment.

On June 20, 2025, the Energy Bureau summoned LUMA to a Virtual Technical Conference (“Conference”) to clarify issues related to the annual and quarterly factor proposals. On June 24, 2025, the Conference was held. The Energy Bureau issued several bench orders requiring LUMA to provide certain information and to clarify certain aspects related to its proposal for annual factors. On June 24, 2025, LUMA filed a brief titled *Motion in Compliance with Bench Orders of June 24, 2025*, submitting all the responses to the requests made during the Conference.

On June 30, 2025, the Energy Bureau issued a comprehensive *Resolution and Order* addressing the annual and quarterly adjustment clauses (“June 30 Order”). On what is relevant to

this motion, in the June 30 Order, the Energy Bureau approved the reconciliation of the FCA and PPCA for the period of March 1, 2025, through May 31, 2025, after a detailed review of actual fuel costs, prior period adjustments, and supporting documentation submitted by LUMA. The Energy Bureau determined that the methodology and calculations presented were reasonable, following regulatory requirements, and it authorized the implementation of an adjustment reflecting a credit to customers for the relevant period. The FCA, PPCA, and FOS factors established from July 1 to September 30, 2025, are:

<b>Adjustment Clause</b>	<b>Factor (\$/kWh)</b>	<b>Effective Dates</b>
FCA	\$0.119003	July 1, 2025, to September 30, 2025
PPCA	\$0.051953	July 1, 2025, to September 30, 2025
FOS	\$0.021137	July 1, 2025, to September 30, 2025

Furthermore, in the June 30 Order, the Energy Bureau notes that, during the previous quarterly reconciliation, a reserve was created to cover the payment associated with the proposed amendment to the LGA OMA. Specifically, for March, April, and May 2025, an amount of \$30 million (\$10 million per month) was set aside as part of the fuel cost calculations, anticipating the approval of the LGA OMA amendment. This reserve was included in the calculation of the total fuel cost for that period.<sup>3</sup> The June 30 Order required LUMA to continue collecting this reserve for July, August, and September 2025, again at \$10 million per month, for a total of \$30 million, as part of the FCA for that quarter.

On July 7, 2025, the Energy Bureau issued a Resolution and Order (“July 7 Order”) addressing the procedural status of the proposed amendment to LGA OMA. After a procedural summary of matters that led to the absence of a finalized amendment, the Energy Bureau

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<sup>3</sup> Additionally, the Order established the factors for the FCA, PPCA and FOS riders for the quarter beginning July 1, 2025, through September 30, 2025. The Bureau also approved the annual factors for the contribution in lieu of taxes, help to human subsidies, non-help to human subsidies and energy efficiency rider for the period July 1, 2025, through June 30, 2026. The Order provided detailed methodologies for the calculation of each rider, required LUMA to implement the approved factors, and set forth deadlines for future filings and reconciliations.

determined that it could not proceed with its evaluation or approval process. Importantly, the Bureau ordered that the \$40 million previously collected from consumers through the FCA, which had been reserved in anticipation of the LGA OMA amendment, must be returned to consumers. The Energy Bureau also rescinded its prior directive requiring LUMA to collect an additional \$30 million related to the proposed amendment for July through September 2025. However, the Bureau instructed LUMA to retain \$6,081,703.50 as an eligible incentive reserve for Genera's 2024 contract year, pending further regulatory review. The July 7 Order directed LUMA to implement an accelerated adjustment to ensure the prompt return of the reserved funds to consumers and to submit the actual fuel costs for June as soon as they became available to evaluate the accelerated adjustment.

Exercising its role and duties over system regulatory matters pursuant to Section 5.6 of the T&D OMA, LUMA's role is to perform the reconciliations and calculate the proposed factors for the FCA and PPCA, to be reviewed, modified, and approved by this Energy Bureau.

The foregoing motion is being submitted in compliance with the July 7 Order and in compliance with the Accelerated Clause provisions of the Tariff Book.

### **III. Energy Bureau Authority**

This submission of the reconciliation of actual fuel and power purchase costs and proposed factors for riders involve the Energy Bureau's authority under Act 57-2104, as amended by Act 17-2019, to "review and approve and, if applicable, modify the rates or fees charged by electric power service companies in Puerto Rico or the contractor of the transmission and distribution system of Puerto Rico in connection with any matter directly or indirectly related to the provision of electric power services." *See* Act 17-2014, Section 6.3 (n), 22 LPRA §1054(n) (Spanish language) (2024). Also relevant is the Energy Bureau's authority to "formulate and implement

strategies to achieve the objectives of this Act including, but not limited to, attaining the goal of reducing and stabilizing energy costs....” *See Id.* at Section 6.3 (f).

#### **IV. Regulatory Formulas for Calculated FCA, PPCA, and FOS Factors**

##### **1. FCA**

The FCA is a reconciling tariff mechanism that recovers the costs of fuel consumed in PREPA’s generating units every quarter. *See* PREPA Tariff Book page 49. The FCA applies to all the PREPA tariffs, except for the RHR tariff (RFR by its Spanish acronym) applicable to residents of public complexes owned by the Public Housing Administration. The formula for calculating the FCA factor is:

$$\frac{\text{FCA} = \text{Total Cost of Fuel} + \text{Prior Period Reconciliation}}{\text{Total Applicable Net Retail kWh Sales}}$$

*Id.*

The total cost of fuel is the cost of fuel purchased for all PREPA’s generation facilities for the three forecasted months in the quarterly period. *Id.* The prior period reconciliations are the under- or over-recovered funds for the first two months of the current quarter and the last month of the preceding quarter. *Id.* LUMA, on behalf of PREPA, shall provide the estimates of the reconciling balance with each proposed quarterly filing of the FCA. *Id.* Finally, the applicable net retail kWh sales include the sale of energy to all customer classes, including the net metering clients. *Id.*

The quarterly filing of reconciliations and calculated factors is due the second week of the third month of each quarter, and the computed factors, approved by this Energy Bureau, go into effect the first month of the following quarter. The quarterly reconciliations also include, when

applicable and as ordered by the Energy Bureau, any unreconciled amounts from the previous quarter if the factors were not adjusted during that period.

Furthermore, the FCA is re-estimated monthly, comparing the re-estimated recovery of fuel purchased and purchased power for the quarterly period. If the re-estimated fuel purchase and purchased power expenses deviate from the estimates by more than \$20 million, LUMA re-estimates the FCA factor to provide an expected value of zero for the quarterly time.

## **2. PPCA**

The PPCA is a reconciling tariff mechanism that recovers the costs of purchased power from private generators. *Id.* at page 51. The PPCA applies to all the PREPA tariffs, except for the RHR tariff (RFR by its Spanish language acronym) (applicable to residents of public complexes owned by the Public Housing Administration). The formula for calculating the PPCA factor is:

$$\text{PPCA} = \text{Total Costs Purchased Power} + \text{Prior Period Reconciliation}$$

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$$\text{Total Applicable Net Retail kWh Sales}$$

*Id.*

The total cost of purchased power is the cost of the energy and capacity resources purchased from private generators for the three forecasted months in the quarterly period. *Id.* The prior period reconciliations are the under- or over-recovered funds for the first two months of the current quarter and the last month of the preceding quarter. *Id.* LUMA shall provide the estimated reconciling balance with each proposed quarterly filing of the PPCA. *Id.* Finally, the applicable net retail kWh sales include the sale of energy to all customer classes, including the net metering clients. *Id.*

Furthermore, the PPCA is re-estimated every month, comparing the re-estimated recovery of fuel purchased and purchased power for the quarterly period. If the re-estimated fuel purchase



and purchased power expenses deviate from the estimates by more than \$20 million, LUMA re-estimates the PPCA factor to provide an expected value of zero for the quarterly period.

## **V. FCA and PPCA Reconciliation**

For June 2025, the total fuel costs, inclusive of prior period adjustments under the FCA mechanism, amounted to \$172,656,038.76, while revenues collected for the same period totaled \$173,504,186.42. This resulted in an excess revenue of \$848,147.66 to be credited to customers in accordance with the applicable reconciliation procedures.

With respect to purchased power costs, including prior period adjustments under the PPCA clause, the total expenses incurred were \$71,997,602.60, against revenues of \$69,817,947.47, resulting in a revenue shortfall of \$2,179,655.13 to be recovered in subsequent periods pursuant to the approved tariff methodology.

In compliance with the July 7 Order of the Energy Bureau, LUMA has recalculated the applicable adjustment factors in strict adherence to the methodologies outlined in the Tariff Book. Accordingly, LUMA is submitting for the Energy Bureau's consideration an Accelerated Adjustment Clause calculation, which incorporates the recalculated factors and is supported by all required work papers and documentation.

The table below summarizes the proposed adjustment factors for implementation during the months of August and September 2025:

<b>Adjustment Clause</b>	<b>Factor (\$/kWh)</b>	<b>Effective Dates</b>
FCA	\$0.102718	August 1, 2025, to September 30, 2025
PPCA	\$0.047325	August 1, 2025, to September 30, 2025
FOS	\$0.021137	August 1, 2025, to September 30, 2025

## **VI. FCA and PPCA Calculated Factors**

As detailed in the accompanying spreadsheet, "August\_Sept 2025 Proposed Factors.xlsx," LUMA is effectuating the return of \$40 million previously collected from customers between

March and June 2025 in connection with the reserve established for the proposed amendment to the LGA OMA. In addition, LUMA is refunding the projected \$20 million that would have been collected for the months of August and September 2025 for the same purpose. For the Energy Bureau's awareness, due to the timing and mechanics of the projection, collection, reconciliation and implementation of the June 30 Order processes, \$10 million associated with the LGA OMA reserve is already being recovered in the month of July 2025. This amount will be refunded to customers through the adjustment factors to be proposed in September 2025, consistent with the Bureau's directives.

Furthermore, LUMA has included the amount of \$6,081,703.50 as the eligible incentive for fuel savings attributable to Genera PR, LLC for the 2024 contract year, as previously identified and authorized by the Energy Bureau.

#### **VIII. List of Documents Filed in Support of the Accelerated Reconciliation and Calculated FCA and PPCA**

##### **A. Confidential Folder**

- FAC-PPAC Reconciliation June 2025.xlsx
- FAC-PPAC Reconciliation Mar-Apr-May 2025.xlsx
- August\_Sept 2025 Proposed Factors.xlsx

##### **B. Public Folder**

- FAC-PPAC Reconciliation June 2025\_Values.xlsx
- FAC-PPAC Reconciliation Mar-Apr-May 2025\_Values.xlsx
- August\_Sept 2025 Potential Factors Values.xlsx

The files are attached to this motion as Exhibit 1.

#### **IX. Request for Confidential Treatment of Excel Files and Supporting Memorandum of Law**

The confidential Excel files mentioned in the preceding section of this Motion *supra*, submitted with this Motion, include Excel spreadsheets submitted in native format (.xls) and with

formulae intact. They contain formulae and original calculations by LUMA personnel that reveal confidential procedures. They also include sensitive commercial information belonging to LUMA and/or PREPA that is thus protected by law from disclosure, and that should not be disclosed in native form.

**A. Applicable Laws and Regulations to submit information confidentially to the Bureau**

The bedrock provision on the management of confidential information filed before the Energy Bureau is Section 6.15 of Act 57-2014, known as the “Puerto Rico Energy Transformation and Relief Act.” It provides, in pertinent part, that: “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 Commission to treat such information as such ....” 22 LPRA §1054n. If the Energy Bureau determines, after appropriate evaluation, that the 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.” *Id.* at Section 6.15 (a).

Relatedly, in connection with the duties of electric power service companies, Section 1.10 (i) of Act 17-2019 provides that an electric power service company shall provide information requested by customers, except for confidential information under the Rules of Evidence of Puerto Rico.”

Access to the confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.*, Section 6.15(b). Finally, Act 57-2014 provides that this 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 [Bureau] who need to know such information under nondisclosure agreements. However, the [Bureau] shall direct that a non-confidential copy be furnished for public review”. *Id.*, Section 6.15 (c).

The Energy Bureau’s Policy on Confidential Information details the procedures a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the referenced Policy requires the identification of the confidential information and the filing of a memorandum of law explaining the legal basis and support for a request to file information confidentially. *See* CEPR-MI-2016-0009, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and the reasons why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.* at paragraph 3. The party that seeks confidential treatment of information filed with the Bureau must also file both a “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.* at paragraph 6.

The aforementioned Energy Bureau policy on the management of confidential information in procedures states the following concerning access to validated Trade Secret Information:

1. Trade Secret Information

Any document designated by the [Energy Bureau] as Validated Confidential Information, because it is a trade secret under Act 80-2011 may only be accessed by the Producing Party and the [Bureau], unless otherwise set forth by the [Bureau] or any competent court.

*Id.* at Section D (on Access to Validated Confidential Information).

Relatedly, Energy Bureau Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, includes a provision for filing confidential information in adjudicatory proceedings before this honorable Bureau. To wit, Section

1.15 provides that “a person has the duty to disclose information to the [Bureau] considered to be privileged information, request the [Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to ... Article 6.15 of Act No. 57-2015, as amended. *See also* Bureau Regulation No. 9137 on *Performance Incentive Mechanism*, Section 1.13 (addressing disclosure before the Bureau of Confidential Information and directing compliance with Resolution CEPR-MI-2016-0009.

### **B. Grounds for Confidentiality**

Under the Industrial and Trade Secret Protection Act of Puerto Rico, Act 80-2011, 10 LPRA §§4131-4144, industrial or trade secrets are deemed to be any information:

- (a) That has a present or a potential independent financial value or that provides a business advantage, insofar as such information is not common knowledge or readily accessible through proper means by persons who could make a monetary profit from the use or disclosure of such information, and
- (b) for which reasonable security measures have been taken, as circumstances dictate, to maintain its confidentiality.

*Id.* at §4131, Section 3 Act. 80-2011.<sup>4</sup> Trade secrets include, but are not limited to, processes, methods, mechanisms, manufacturing processes, formulas, projects, or patterns to develop machinery and lists of specialized clients that may afford an advantage to a competitor. *See* Statement of Motives, Act 80-2011. As explained in the Statement of Motives of Act 80-2011, protected trade secrets include any information bearing commercial or industrial value that the

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<sup>4</sup> Relatedly, Rule 513 of the Rules of Evidence of Puerto Rico provides that the owner of a trade secret may invoke the privilege to refuse to disclose, and to prevent another person, from disclosing trade secrets, provide that these actions do not tend to conceal fraudulent actions or lead to an injustice. 32 P.R. Laws Annot. Ap. VI, R 513. If a court of law mandates disclosure of a trade secret, precautionary measures should be adopted to protect the interests of the owner of the trade secret. *Id.*

owner reasonably protects from disclosure. *Id.*; see also Article 4 of Puerto Rico's Open Data Law, Act 122-2019 (exempting the following from public disclosure: (1) commercial or financial information whose disclosure will cause competitive harm; (2) trade secrets protected by a contract, statute or judicial decision (3) private information of third parties). See Act 122-2019, Articles 4 (ix) and (x) and (xi).

The Puerto Rico Supreme Court has explained that the trade secrets privilege protects free enterprise and extends to commercial information that is confidential in nature. *Ponce Adv. Med. v. Santiago Gonzalez*, 197 DPR 891, 901-02 (2017) (citation omitted).

The Excel spreadsheets submitted today in native form and with formulae intact in the file entitled *Confidential* are protected as trade secrets. They have commercial value to LUMA and PREPA as they reveal confidential processes and analysis to produce calculations in support of the public filings of the proposed rider factors. LUMA and PREPA keep and maintain these native files confidential and do not disclose them to the public or unauthorized third parties.

LUMA appreciates the importance of placing the Energy Bureau in the position of reviewing the reconciliations and fixing the annual factors. However, to avoid future competitive harms that could ensue if original format spreadsheets with formulae and calculations are publicly disclosed, LUMA respectfully requests that the Excel files submitted today in the file entitled *Confidential* be received, kept, and maintained confidentially by this Energy Bureau.

The confidential spreadsheets included in the file entitled *Confidential* are: (1) documents with commercial and financial value, and (2) involve data that is not common knowledge or readily accessible by third parties who may seek profit from the data or gain commercial advantages. The spreadsheets are business documents showing processes, methods, and mechanisms that garner protection under Act 80-2011. They are original documents that have not been disclosed to third

parties and whose disclosure would reveal sensitive and private commercial processes employed by LUMA and PREPA. The disclosure of this sensitive commercial information would place LUMA and PREPA in vulnerable and disadvantageous commercial positions that could affect LUMA customers and impact rates. Reasonable measures have been taken to protect the files from disclosure and avoid unauthorized access by third parties that could seek to gain commercial advantages. It is respectfully submitted that the spreadsheets included in the file entitled *Confidential* are trade secrets protected from public disclosure by Act 80-2011.

**WHEREFORE**, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned, **accept** the filing of the accelerated reconciliation for fuel and purchase power costs for June 2025 and recalculated FCA and PPCA factors to apply starting on August 1, 2025; and **grant** the request to keep confidentially the spreadsheets that have been filed in excel format and with formulae in the file entitled *Confidential* that is submitted with this Motion.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 15<sup>th</sup> day of July 2025.

I hereby certify that this Motion was filed using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to the Puerto Rico Electric Power Authority, through: Lionel Santa [lionel.santa@prepa.com](mailto:lionel.santa@prepa.com); Alexis Rivera, [arivera@gmlex.net](mailto:arivera@gmlex.net); Juan M. Martínez Nevárez, [jmartinez@gmlex.net](mailto:jmartinez@gmlex.net); and Juan R. González Galarza, [jgonzalez@gmlex.net](mailto:jgonzalez@gmlex.net); to Genera PR, LLC through: Luis Roman Negrón, [lrn@roman-negron.com](mailto:lrn@roman-negron.com); [legal@genera-pr.com](mailto:legal@genera-pr.com); and [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); and to the Independent Consumer Protection Office, through Director Hannia Rivera, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov).



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*/s/ Margarita Mercado Echegaray*

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*Exhibit 1*

*Supporting files to be submitted via email*