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

Received:

Aug 22, 2025

9:40 AM

IN RE: CLARO'S REQUEST FOR CERTIFICATION AS HIGHLY EFFICIENT GENERATION FOR THE PURPOSE OF ACT 60-2019 **CASE NO.:** NEPR-CT-2024-0002

SUBJECT: Request an extension to comply with July 24, 2025, Resolution and Order and to notify appearance of legal representation.

MOTION TO REQUEST AN EXTENSION TO COMPLY WITH THE JULY 24, 2025, RESOLUTION AND ORDER AND TO NOTIFY APPEARANCE OF LEGAL REPRESENTATION

To the Honorable Puerto Rico Energy Bureau:

COMES NOW Puerto Rico Telephone Company, Inc. D/B/A CLARO, through the undersigning counsel, and respectfully states and request the following:

I. Introduction and discussion.

- 1. On July 24, 2025, the Honorable Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("July 24 R&O") through which it granted the Puerto Rico Telephone Company, Inc. d/b/a Claro ("Claro") thirty days to submit the information described therein that is related to Claro's June 10, 2024, Motion to Request Certification as Highly Efficient Generation, to Request Designation as a Personal Microgrid under Regulation No. 9028 and to Request a Determination Regarding the Applicability of Regulation 8701, and to Request Confidential Treatment ("June 10 Motion").
 - 2. The referenced thirty-day term expires on August 25, 2025.¹

¹ The thirty-day term expires on August 23, 2025. However, that day is a Saturday and, as such, it is extended to the next business day, Monday, August 25, 2025, pursuant to the provisions of Section 1.09 of Regulation No. 8543, Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigations (December 18, 2014).

3. Through the July 24 R&O, the Energy Bureau also authorized members of its staff and

consultants to hold informal technical meetings with Claro's representatives and consultants

for the purpose of clarifying the requirements set forth therein.

4. Today, the undersigning legal counsel assumed Claro's representation in the instant

case. Therefore, Claro hereby respectfully request the Energy Bureau to grant and additional

thirty-day term to have an opportunity to meet with the Energy Bureau Staff and

representatives to clarify certain aspects of the request for information in order to be able to

fully comply with the July 24 R&O.

5. Claro respectfully argues that such extension is reasonable and certifies it is made in

good faith and without the intention to unduly delay the proceedings.

II. Notice of Appearance and Request for Notice

1. As stated in Part I of this Motion, the undersigning legal counsel assumed Claro's

representation in the instant case. As such he hereby enters a formal appearance as legal

counsel of record on behalf of Claro.

2. Claro respectfully requests that all future notices resolutions, orders, and any other

document entered in the instance case be also served to:

120 Chardon Ave. Apt. 019 San Juan, P.R. 00918

Ph.: (787) 470-4863

Ángel R. Rivera de la Cruz: arrivera@nuenergypr.com

III. Conclusion.

For all the above, CLARO respectfully request the Honorable Energy Bureau to:

(1) Grant an additional thirty-day extension to comply with the July 24 R&O;

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- (2) Take notice of the notification of appearance of the undersigned legal counsel and add him to all future notifications, resolutions, orders, and any other document entered in the instance case; and
- (3) Issue any other determination that is appropriate under the law.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 22, 2025.

Nu Energy Consulting Group, LLC 120 Chardon Ave. Apt. 019 San Juan, P.R. 00918 Ph. 787-470-4863

> /s/ Angel R. Rivera de la Cruz Angel R. Rivera de la Cruz RUA No. 19,647 arrivera@nuenergypr.com