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

IN RE: *PLAN PRIORITARIO PARA LA ESTABILIZACIÓN DE LA RED ELÉCTRICA*	**CASE NO**.: NEPR-MI-2024-0005

MOTION REQUESTING EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND ORDER OF AUGUST 28, 2025

TO THE HONORABLE ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority (hereinafter, PREPA) through its undersigned legal representation and, very respectfully, informs and requests as follows:

1. On August 28, 2025, the Energy Bureau issued a Resolution and Order ("August 28-Resolution") in the above-captioned proceeding. The Resolution and Order follows the March 28, 2025, approval of the Electric System Priority Stabilization Plan (PSP"), which established urgent activities to reduce load shedding and stabilize the grid within two (2) years, including Activity #14 (installation of 4x 25 MW Utility-Scale Battery Energy Storage Systems).

2. The August 28-Resolution requires both LUMA and PREPA to file verified compliance reports within ten (10) calendar days. With respect to PREPA, the Order directs it to:

a. Re-file in this docket the Consolidated Project Plan list that it submitted in Case No. NEPR-MI-2020-0012, and submitted to FEMA on August 8, 2025, with all supporting workbooks;

b. Identify where/when the Energy Bureau granted prior approval for each project (i.e., docket, order date, page, and item reference); and

c. Justify the proposed hydro/dam rehabilitation funding of approximately $1.3 billion by filing a quantitative analysis demonstrating efficiency relative to near-term capacity measures, including comparisons of capacity impacts, loss-of-load events, and cost-effectiveness.

3. PREPA has diligently undertaken efforts to comply with the August 28-Resolution. Specifically, PREPA is currently editing the table submitted with the Consolidated Project Plan to incorporate the detailed information requested by the Energy Bureau. Additionally, PREPA is in the process of gathering the remaining data and documentation necessary to complete the required justification regarding hydro/dam rehabilitation funding.

4. Despite these efforts, additional time is required to finalize the information and ensure that PREPA's submission is complete and accurate. Accordingly, PREPA respectfully requests an extension of ten (10) calendar days from the current deadline to comply with the August 28-Resolution.

5. This request is made in the utmost good faith and solely to ensure that the Energy Bureau receives the information it requested completely and accurately by PREPA.

WHEREFORE, PREPA respectfully requests that the Energy Bureau: (a) take **NOTICE** of the present Motion, and (b) **GRANT** the extension requested.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on September 8th, 2025.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at https://radicacion.energia.pr.gov/login, and courtesy copies were sent via e-mail to LUMA Energy, LLC through its counsels of record at margarita.mercado@us.dlapiper.com, laura.rozas@dlapiper.com, yahaira.delarosa@us.dlapiper.com, and to Genera PR, LLC through its counsels of record at jfr@sbgblaw.com.

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