

**COMMONWEALTH OF PUERTO RICO  
PUERTO RICO ENERGY BUREAU**

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

**CASE NO.:** NEPR-AP-2023-0003

**SUBJECT:** PREPA Bondholders' Opposition  
to ICSE's Intent to Reply to Dr. Tierney

**NEPR**

**Received:**

**Sep 10, 2025**

**9:17 AM**

**PREPA BONDHOLDERS' OPPOSITION TO ICSE'S  
INTENT TO REPLY TO DR. TIERNEY**

**TO THE PUERTO RICO ENERGY BUREAU:**

Petitioners National Public Finance Guarantee Corporation, GoldenTree Asset Management LP, Syncora Guarantee, Inc., Assured Guaranty Inc., and the PREPA Ad Hoc Group<sup>1</sup> (collectively, the "Bondholders"), by and through the undersigned counsel, hereby submit this opposition to the Institute of Competitiveness and Economic Sustainability's ("ICSE") stated intent to reply to the *Answering Testimony of Susan Tierney, Ph.D.*<sup>2</sup> ICSE's stated intent to reply to Dr. Tierney's testimony violates the operative schedule in this proceeding as well as the Hearing Examiner's clear, repeated instructions, and therefore ICSE should be directed that it may not file such a reply. To the extent ICSE's stated intent is construed as a motion to amend the schedule so as to allow for such a reply, it should be denied.

On May 2, 2025, the Hearing Examiner set a procedural schedule whereby intervenors' answering testimony regarding the rate petition would be due on September 1, 2025.<sup>3</sup> The

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<sup>1</sup> The members of the PREPA Ad Hoc Group are listed in the *Ninth Verified Statement of the PREPA Ad Hoc Group pursuant to Bankruptcy Rule 2019*, ECF No. 5797, filed in *In re Fin. Oversight & Mgmt. Bd. for Puerto Rico*, Case No. 17-BK-04780-LTS (D.P.R. Aug. 28, 2025).

<sup>2</sup> A Spanish summary of this filing is attached hereto as Appendix A, pursuant to the orders of May 9th and June 4th.

<sup>3</sup> *Hearing Examiner's Order on Procedure and Rate Design Conference*, NEPR-AP-2023-0003, at p.4 (May 2, 2025). This deadline was later amended to September 2, 2025.

schedule does not contemplate any written rebuttal/reply to intervenor answering testimony by other intervenors.

On August 21, 2025, the Hearing Examiner modified the procedural schedule on a limited basis to allow for certain intervenor answering testimony to be submitted by September 8, 2025.<sup>4</sup> That order mandated, “[N]o party submitting testimony on September 8 may, in that document, address matters addressed by another party on September 2.”<sup>5</sup>

On August 29, 2025, counsel for the Official Committee of Unsecured Creditors of PREPA (the “UCC”), an intervenor, stated an intent to “fil[e] a reservation of rights on September 1,” after which the UCC said it would address other parties’ submissions “in the upcoming rebuttal submissions, which we understand are scheduled to be filed on October 17.”<sup>6</sup>

Counsel for National objected to the UCC’s stated intent to file a rebuttal(s) to other intervenors’ testimony on October 17th.<sup>7</sup> Counsel for National explained that the governing schedule does not contemplate “rebuttals as to any party other than the PREB consultants” on that date, and that such a rebuttal/response by the UCC “would not be appropriate.”<sup>8</sup>

That same day, the Hearing Examiner confirmed this fact in an e-mail to all rate case participants (including counsel for ICSE).<sup>9</sup> As relevant here, Mr. Hempling stated, “There is no opportunity in the schedule for pre-filed comments by intervenors on other intervenors’

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<sup>4</sup> See *Hearing Examiner’s Order Extending Time for Answering Testimony*, NEPR-AP-2023-0003 (Aug. 21, 2025).

<sup>5</sup> *Id.* at p.1.

<sup>6</sup> Aug. 29, 2025 12:58pm E-mail from J. Nieves-Gonzalez to rate case participants, at p.6 (attached hereto as Exhibit A).

<sup>7</sup> Exhibit A at p.4.

<sup>8</sup> *Id.*

<sup>9</sup> See Exhibit A at p.1.

submissions.”<sup>10</sup> What’s more, the Hearing Examiner sent another e-mail that day to rate case participants (including counsel for ICSE), once again instructing that, “The Oct. 17 opportunity is only for responses to the PREB experts’ reports .... I will strike any Oct. 17 submission that is not a rebuttal to those expert reports.”<sup>11</sup>

On September 2, 2025, the Bondholders timely filed the *Answering Testimony of Susan Tierney, Ph.D.*<sup>12</sup> Among other things, Dr. Tierney’s testimony addresses the issue of “affordability,” opining at a high level that: (i) “I agree with the steps taken by the Energy Bureau to date to address affordability issues”; and (ii) “[E]xplicit analysis of ‘affordability’ more typically enters into utility ratemaking only in the cost-allocation and rate design phases, and not when determining the amount of revenues a utility needs to cover expenses (including its financing costs) in the revenue requirement phase.”<sup>13</sup>

On September 8, 2025—after not submitting any answering testimony on September 2nd—ICSE filed its own testimony.<sup>14</sup> The ICSE Testimony purported to address matters raised by Dr. Tierney on September 2nd, in direct violation of the Hearing Examiner’s August 21st order,<sup>15</sup> and ICSE stated that “it intends to further reply to Dr. Susan Tierney’s testimony ... and to answer its substance.”<sup>16</sup>

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<sup>10</sup> *Id.*

<sup>11</sup> Aug. 29, 2025 3:34pm E-mail from S. Hempling to rate case participants (attached hereto as Exhibit B).

<sup>12</sup> The Bondholders and Wal-Mart were the only intervenors to submit any answering testimony on September 2nd.

<sup>13</sup> *Answering Testimony of Susan Tierney, Ph.D.*, NEPR-AP-2023-0003, at p.7 (Sept. 2, 2025) (the “Dr. Tierney Testimony”).

<sup>14</sup> See ICSE’s *Motion Submitting Expert Witness Report & Presenting the Context in which It Is Filed*, NEPR-AP-2023-0003 (Sept. 8, 2025) (the “ICSE Testimony”). The Bondholders note it is far from clear that ICSE had a good-faith basis to take the extension, given that the content of its testimony does not appear to relate to delayed information.

<sup>15</sup> *Hearing Examiner’s Order Extending Time for Answering Testimony*, NEPR-AP-2023-0003, at p.1 (Aug. 21, 2025).

<sup>16</sup> ICSE Testimony at p.3.

ICSE’s statement that it will further respond to the Dr. Tierney Testimony is clearly prohibited. Even if the governing schedule were not clear on this point (it is), the Hearing Examiner already clarified to all case participants, on two separate occasions, that intervenors cannot file responses to other intervenors’ testimony—precisely what ICSE now says it will do. ICSE should not be allowed to flout the governing schedule and the Hearing Examiner’s orders.

To the extent that ICSE’s statement of intending to further reply is construed as a motion to modify the schedule so as to allow intervenors to file responses to other intervenors’ testimony, such a motion should be denied. ICSE offers no basis to modify the schedule, except to spuriously claim—without any support—that Dr. Tierney somehow “mischaracteriz[es] ICSE previous filings [*sic*].”<sup>17</sup> That baseless accusation is false. Nor does ICSE even attempt to explain how the schedule could accommodate an additional round of testimony by intervenors responding to other intervenors, particularly when the Hearing Examiner has stressed the importance of not compressing “any of the remaining steps” in the schedule.<sup>18</sup>

**WHEREFORE**, for the reasons stated above, the Bondholders respectfully request that the Energy Bureau (i) direct ICSE that it may not file a further reply to the Dr. Tierney Testimony under the controlling schedule and orders; and (ii) grant such other and further relief as deemed proper in light of ICSE’s non-compliance with case procedures and orders.

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<sup>17</sup> *Id.* at p.3.

<sup>18</sup> *Hearing Examiner’s Order Extending Time for Answering Testimony*, NEPR-AP-2023-0003, at p.1 (Aug. 21, 2025). If the Hearing Examiner nonetheless grants ICSE an opportunity to respond to the Dr. Tierney Testimony, the Bondholders submit that such an opportunity would need to be reciprocal, so that Dr. Tierney would also have an equal opportunity to respond to the ICSE Testimony.

RESPECTFULLY SUBMITTED,

THIS 10th DAY OF SEPTEMBER 2025

**CERTIFICATE OF SERVICE:** We hereby certify that the foregoing petition was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System, and courtesy copies were sent via electronic means to mvalle@gmlex.net; arivera@gmlex.net; jmartinez@gmlex.net; jgonzalez@gmlex.net; katiuska.bolanos-lugo@us.dlapiper.com; Yahaira.delarosa@us.dlapiper.com; margarita.mercado@us.dlapiper.com; carolyn.clarkin@us.dlapiper.com; andrea.chambers@us.dlapiper.com; sromero@sbgblaw.com; gcastrodad@sbgblaw.com; jennalvarez@sbgblaw.com; jfr@sbgblaw.com; regulatory@genera-pr.com; legal@genera-pr.com; hriviera@jrsp.pr.gov; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com; Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidehouse.com; Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; kara.smith@weil.com; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; jan.albinolopez@us.dlapiper.com; Rachel.Albanese@us.dlapiper.com; varoon.sachdev@whitecase.com; jdiaz@sbgblaw.com; javrua@sesapr.org; Brett.ingerman@us.dlapiper.com; agraitfe@agraitlawpr.com; jpouroman@outlook.com; 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; lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; isaac.glassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; hburgos@cabprlaw.com; dperez@cabprlaw.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; escalera@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; David.herman@dechert.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; juan@londoneconomics.com; mestrada@gibsondunn.com; LShelfer@gibsondunn.com; jnieves@cstlawpr.com; arrivera@nuenergypr.com; apc@mcvpr.com; shempling@scotthemplinglaw.com; rsmithla@aol.com; guy@maxetaenergy.com; jorge@maxetaenergy.com; rafael@maxetaenergy.com; dawn.bisdorf@gmail.com; msdady@gmail.com; mcranston29@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com; carl.pechman@keylogic.com; bernard.neenan@keylogic.com; tara.hamilton@ethree.com; aryeh.goldparker@ethree.com; roger@maxetaenergy.com; Shadi@acciongroup.com.

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# **Appendix A**

## **RESUMEN DE: OPOSICIÓN DE LOS BONISTAS DE PREPA A LA INTENCIÓN DE ICSE DE RESPONDER AL DR. TIERNEY**

La intención declarada de ICSE de responder al testimonio del Dr. Tierney viola el calendario operativo en este procedimiento, así como las claras y repetidas instrucciones del Oficial Examinador. El Oficial Examinador ya aclaró a todos los participantes del caso, en dos ocasiones distintas, que los intervinientes no pueden presentar respuestas al testimonio de otros intervinientes—precisamente lo que ICSE ahora dice que hará. No se debería permitir que ICSE ignore el calendario establecido y las órdenes del Oficial Examinador.

En la medida en que la declaración de ICSE de que tiene la intención de responder más adelante se interprete como una moción para modificar el calendario con el fin de permitir que los intervinientes presenten respuestas al testimonio de otros intervinientes, dicha moción debe ser denegada. ICSE no ofrece ninguna base para modificar el calendario, salvo alegar de manera espuria —sin ningún respaldo— que la Dra. Tierney de alguna manera 'tergiversa los escritos previos de ICSE'. Esa acusación infundada es falsa. ICSE tampoco intenta explicar cómo podría el calendario acomodar una ronda adicional de testimonios por parte de intervinientes respondiendo a otros intervinientes, especialmente cuando el Oficial Examinador ha recalcado la importancia de no comprimir 'ninguno de los pasos restantes' en el calendario."

Los bonistas respetuosamente solicitan que el Negociado de Energía (i) instruya a ICSE que no puede presentar una respuesta adicional al testimonio de la Dra. Tierney conforme al calendario y las órdenes vigentes; y (ii) conceda cualquier otro remedio adicional que se considere apropiado a la luz del incumplimiento de ICSE con los procedimientos y órdenes del caso.

# **EXHIBIT A**

## Brady, Corey

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**From:** Scott Hempling <shempling@scotthemplinglaw.com>  
**Sent:** Friday, August 29, 2025 15:23  
**To:** Carlos Fernandez Lugo; Brady, Corey; Juan Nieves-Gonzalez; Mercado, Margarita; A. Casellas; A. Hopkins; A. Rivera; A. Rivera; Agrait; Anu Sen; André J Palerm Colón; Arizmendis; Bill Natbony; Brian; Casey Servais; Clane; Columbres; Contratistas; D. Perez; Dady; David Herman; Dawn Bisdorf; Dora Monserrate; Ellen Smith; Emmanuelli; EPO; Eric Brunstad; Erickay; Escalera; F. Gierbolini; G. Castrodad; G. Kurtz; Morgan, Gabriel; Gill; Green; Guy; H. Burgos; H. Judd; H. Rivera; Howard Hawkins; I. Glassman; Islam, Intisarul; J. Avrua; Juan J. Casillas Ayala; J. Cunningham; J. Gonzalez; J. Martinez; J. Rincon; Jenna Alvarez; JFR; Jorge Maxetaenergy; Trachtenberg, Josef; Josh Llamas; Juan; Julia; K. Bailey; Smith, Kara; L. Oliver; L. Shelfer; Legal Genera; Luke; M. Cranston; mshepherd@whitecase.com; Mark Ellenberg; Barr, Matt; Michael Doluisio; Mirelis Valle; P. Vazquez; PREB Consultants; R. Schell; R. Smith; Rafael Mazetaenergy; Rafael Ortiz ; Ramos; Regulatory; Rivera; Berezin, Robert; Rolando Emmanuelli; Romero; Stephen Zide; Stuart Steinberg; Susheelkirkpalani; tlauria@whitecase.com; T. MacWright; Thomas Curtin; Varoon Sachdev; Victor Luis Gonzalez; Zachary Ming  
**Cc:** Azize, Ingrid; Clarkin, Carolyn; Sonia Seda; Legal; Secretaria; Porro Gonzalez, Emmanuel; Sonia Seda; Secretaria; Solberg, Brett  
**Subject:** RE: [EXTERNAL]RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

Counsel,

It looks like everyone can sure use a three-day break. I hope you get some time to relax.

Mr. Fernandez Lugo is correct, re what is due Sept. 2 and what is due on Sept. 8. Everyone use good faith, no one please object. The order quoted below is, I hope, clear.

Mr. Brady is also correct. The Oct. 17 opportunity is for intervenors to comment on the expert reports provided by the PREB consultants. There is no opportunity in the schedule for prefiled comments by intervenors on other intervenors' submissions. Certainly at the hearing I, or other PREB consultants, might question panelists about the views of other panelists. And certainly those who cross-examine can cross-examine on anything that others have submitted (though no friendly cross). Remember please that the purpose of the hearing is to help the Commissioners and their advisors learn all that they can so that the Commissioners can make the best possible decision. Let us remember, please, that though the format is partly adversarial, the purpose is educational.

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**From:** Carlos Fernandez Lugo <Cfl@mcvpr.com>  
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**Subject:** Re: [EXTERNAL]RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

Point of clarification (given the reference to September 1 in the below email), per the Hearing Examiner's order of August 21, my understanding is that intervenor answering testimony that is unaffected by the delay in the production of confidential information is due September 2. Conversely, if affected, intervenor testimony would be due on September 8. If this is not correct, I would appreciate Mr. Hempling's clarification.

Thank you

# Hearing Examiner's Order Extending

Subject to the next paragraph, all intervenor testimony due September 1, 2025, will be due September 8, 2025. This extension applies to PREPA, LUMA, or Genera responding to one or both of the following questions:

This extension is available only to those cases where the intervenor's testimony is Meaning: The party may take the extension only if the testimony is necessitated by the lag in receiving information from the other party. If there are subjects unaffected by the lag, and if the party can submit the testimony separately without causing confusion, the party must submit the testimony by September 2, 2025. For parties in that situation, the deadline for Answering Testimony and the September 8 submission deadline for Testimony.



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**Subject:** [EXTERNAL]RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

The October 17<sup>th</sup> deadline to which Mr. Nieves-Gonzalez refers is for “Intervenors' **rebuttal to PREB consultants'** expert reports on revenue requirement and rate design.” See May 2<sup>nd</sup> procedural schedule. Yet Mr. Nieves-Gonzalez contemplates evaluating and responding to “other parties’ submissions” by such date. I did not understand the October 17<sup>th</sup> deadline to permit rebuttals as to any party other than the PREB consultants. Assuming that understanding is correct, I submit that it would not be appropriate for the UCC to respond to parties other than the PREB consultants.

**Weil**

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**Subject:** RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

Examiner Hempling,

Thank you for your email of earlier today. As we indicated in our response, the Official Committee of Unsecured Creditors of PREPA, as Intervenor, intends to participate in the status conference scheduled for Thursday, September 4. In the interim, as you know, the schedule currently provides for Intervenors to file initial submissions on Monday, September 1. Given the number of issues that have arisen in PREPA's Title III case, including the recent termination of 6 of the Oversight Board's 7 members, we will be filing a reservation of rights on September 1. This will ensure our opportunity to evaluate developments and other parties' submissions to better assess what issues, if any, we may need to address in the upcoming rebuttal submissions, which we understand are scheduled to be filed on October 17. To that end, we wanted to confirm that nothing other than a Reservation of Rights would be necessary at this point.

Kind regards,

**Juan Nieves-Gonzalez** | Attorney At Law

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**From:** Scott Hempling <[shempling@scotthemplinglaw.com](mailto:shempling@scotthemplinglaw.com)>

**Sent:** Friday, August 29, 2025 10:59 AM

**To:** Juan Nieves-Gonzalez <[jnieves@cstlawpr.com](mailto:jnieves@cstlawpr.com)>; Mercado, Margarita <[Margarita.Mercado@us.dlapiper.com](mailto:Margarita.Mercado@us.dlapiper.com)>; A. Casellas <[acasellas@amgprlaw.com](mailto:acasellas@amgprlaw.com)>; A. Hopkins <[ahopkins@synapse-energy.com](mailto:ahopkins@synapse-energy.com)>; A. Rivera <[arivera@gmlex.net](mailto:arivera@gmlex.net)>; A. Rivera <[arivera@nuenergypr.com](mailto:arivera@nuenergypr.com)>; Agrait <[agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com)>; Anu Sen <[Anu.Sen@fticonsulting.com](mailto:Anu.Sen@fticonsulting.com)>; APC <[apc@mcvpr.com](mailto:apc@mcvpr.com)>; Arizmendis <[arizmendis@reichardescalera.com](mailto:arizmendis@reichardescalera.com)>; Bill Natbony <[bill.natbony@cwt.com](mailto:bill.natbony@cwt.com)>; Brian <[Brian@londoneconomics.com](mailto:Brian@londoneconomics.com)>; Casey Servais <[casey.servais@cwt.com](mailto:casey.servais@cwt.com)>; CFL <[Cfl@mcvpr.com](mailto:Cfl@mcvpr.com)>; Clane <[clane@synapse-energy.com](mailto:clane@synapse-energy.com)>; Columbres <[ccolumbres@whitecase.com](mailto:ccolumbres@whitecase.com)>; Contratistas <[contratistas@jrsp.pr.gov](mailto:contratistas@jrsp.pr.gov)>; Corey Brady <[Corey.Brady@weil.com](mailto:Corey.Brady@weil.com)>; D. Perez <[dperez@cabprlaw.com](mailto:dperez@cabprlaw.com)>; Dady <[msdady@gmail.com](mailto:msdady@gmail.com)>; David Herman <[david.herman@dechert.com](mailto:david.herman@dechert.com)>; Dawn Bisdorf <[dawn.bisdorf@gmail.com](mailto:dawn.bisdorf@gmail.com)>; Dora Monserrate

# **EXHIBIT B**

## Brady, Corey

---

**From:** Scott Hempling <shempling@scotthemplinglaw.com>  
**Sent:** Friday, August 29, 2025 15:34  
**To:** Juan Nieves-Gonzalez; Mercado, Margarita; A. Casellas; A. Hopkins; A. Rivera; A. Rivera; Agrait; Anu Sen; APC; Arizmendis; Bill Natbony; Brian; Casey Servais; CFL; Clane; Columbres; Contratistas; Brady, Corey; D. Perez; Dady; David Herman; Dawn Bisdorf; Dora Monserrate; Ellen Smith; Emmanuelli; EPO; Eric Brunstad; Erickay; Escalera; F. Gierbolini; G. Castrodad; G. Kurtz; Morgan, Gabriel; Gill; Green; Guy; H. Burgos; H. Judd; H. Rivera; Howard Hawkins; I. Glassman; Islam, Intisarul; J. Avrua; Juan J. Casillas Ayala; J. Cunningham; J. Gonzalez; J. Martinez; J. Rincon; Jenna Alvarez; JFR; Jorge Maxetaenergy; Trachtenberg, Josef; Josh Llamas; Juan; Julia; K. Bailey; Smith, Kara; L. Oliver; L. Shelfer; Legal Genera; Luke; M. Cranston; mshepherd@whitecase.com; Mark Ellenberg; Barr, Matt; Michael Doluisio; Mirelis Valle; P. Vazquez; PREB Consultants; R. Schell; R. Smith; Rafael Mazetaenergy; Rafael Ortiz ; Ramos; Regulatory; Rivera; Berezin, Robert; Rolando Emmanuelli; Romero; Stephen Zide; Stuart Steinberg; Susheelkirpalani; tlauria@whitecase.com; T. MacWright; Thomas Curtin; Varoon Sachdev; Victor Luis Gonzalez; Zachary Ming  
**Cc:** Azize, Ingrid; Clarkin, Carolyn; Sonia Seda; Legal; Secretaria; Porro Gonzalez, Emmanuel; Sonia Seda; Secretaria; Solberg, Brett  
**Subject:** RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

Mr. Nieves-Gonzalez,

Re your note below, I hope all the prior orders are clear. The time to present testimony on your positions affirmatively is Sept. 2 or Sept. 8. The Oct. 17 opportunity is only for responses to the PREB experts' reports—about which neither I nor any of those experts is making any promise about issue coverage. I will strike any Oct. 17 submission that is not rebuttal to those expert reports. I am not suggesting that you don't understand that point.

As to a "reservation of rights": I've never filed one myself, on the assumption that if I have a right, via statute or rule or order or Constitution, I have it, so I don't have to reserve it. I'm not telling you what to file or not file; only hinting that the fewer documents I receive that don't add to my knowledge, the better.

---

**From:** Juan Nieves-Gonzalez <jnieves@cstlawpr.com>  
**Sent:** Friday, August 29, 2025 12:58 PM  
**To:** Scott Hempling <shempling@scotthemplinglaw.com>; Mercado, Margarita <Margarita.Mercado@us.dlapiper.com>; A. Casellas <acasellas@amgprlaw.com>; A. Hopkins <ahopkins@synapse-energy.com>; A. Rivera <arivera@gmlex.net>; A. Rivera <arivera@nuenergypr.com>; Agrait <agraitfe@agraitlawpr.com>; Anu Sen <Anu.Sen@fticonsulting.com>; APC <apc@mcvpr.com>; Arizmendis <arizmendis@reichardescalera.com>; Bill Natbony <bill.natbony@cwt.com>; Brian <Brian@londoneconomics.com>; Casey Servais <casey.servais@cwt.com>; CFL <Cfl@mcvpr.com>; Clane <clane@synapse-energy.com>; Columbres <ccolumbres@whitecase.com>; Contratistas <contratistas@jrsp.pr.gov>; Corey Brady <Corey.Brady@weil.com>; D. Perez <dperez@cabprlaw.com>; Dady <msdady@gmail.com>; David Herman <david.herman@dechert.com>; Dawn Bisdorf <dawn.bisdorf@gmail.com>; Dora Monserrate <dmonserrate@msglawpr.com>; Ellen Smith <Ellen.Smith@fticonsulting.com>; Emmanuelli <nancy@emmanuelli.law>; EPO <epo@amgprlaw.com>; Eric Brunstad <eric.brunstad@dechert.com>; Erickay <erickay@quinnemanuel.com>; Escalera <escalera@reichardescalera.com>; F. Gierbolini <fgierbolini@msglawpr.com>; G. Castrodad <gcastrodad@sbgblaw.com>; G. Kurtz <gkurtz@whitecase.com>; Gabriel Morgan <Gabriel.morgan@weil.com>; Gill <mmcggill@gibsondunn.com>; Green <jgreen@whitecase.com>; Guy <guy@maxetaenergy.com>; H. Burgos

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**Cc:** Azize, Ingrid <Ingrid.Azize@us.dlapiper.com>; Clarkin, Carolyn <Carolyn.Clarkin@us.dlapiper.com>; Sonia Seda <sseda@jrsp.pr.gov>; Legal <legal@jrsp.pr.gov>; Secretaria <secretaria@jrsp.pr.gov>; Porro Gonzalez, Emmanuel <Emmanuel.PorroGonzalez@us.dlapiper.com>; Sonia Seda <sseda@jrsp.pr.gov>; Secretaria <secretaria@jrsp.pr.gov>; Solberg, Brett <Brett.Solberg@us.dlapiper.com>

**Subject:** RE: Rate case: Tentative conference Thurs Sept. 4 at 1.30p Atlantic

Examiner Hempling,

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Kind regards,

**Juan Nieves-Gonzalez** | Attorney At Law

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