

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

NEPR

Received:

Sep 10, 2025

1:44 PM

IN RE: REQUEST FOR CERTIFICATION
Green Power Technologies Puerto Rico LLC

Case No. NEPR-CT-2024-0004

SUBJECT: Filing of Personal Information
Form. Filing of Gross Revenue Report.
Order to Show Cause pending. Order to file
Operational Report.

REDACTED MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER ISSUED
ON AUGUST 29, 2025

TO THE HONORABLE ENERGY BUREAU:

COMES NOW Green Power Technologies Puerto Rico LLC (“GPTPR” or “Company”),
represented by the undersigned counsel, who respectfully informs and requests the following:

Background

1. On June 11, 2024, the Company filed its initial Request for Certification with the Puerto Rico Energy Bureau (“Energy Bureau”), along with various supporting documents, including its Personal Information Form (NEPR-B01), Operational Report (NEPR-B03), a CPA certification of financial capacity, and a request for confidential treatment under Section 1.15 of Regulation 8701.
2. Subsequently, the Energy Board issued several orders requesting clarification and additional information, which the Company has complied.
3. The Energy Bureau served notice on July 15, 2025, of a Resolution and Order (“July 15 Order”), whereby it ordered GPTPR to file its yearly Operational Report with its corresponding fees, as well as the FY24 Financial Statements.
4. On July 29, 2025 the undersigned filed on behalf of GPTPR
 - a. Motion In Compliance With Resolution And Order Issued on July 15, 2025 ("July 29 Motion") including:
 - i. Exhibit A. Operational Report Electric Power Companies (Form NEPR-B03).
 - ii. Exhibit B. Information on the professional and academic background (resume) of Green Power Chief Executive Officer.
 - iii. Exhibit C. Green Power's Corporation Income Tax Returns for FY2024 (Puerto Rico Department of Treasury Form 480.20).
 - iv. Exhibit D. Green Power's Income Statement.


- b. Motion to File Under Seal to Protect Confidential Information Pursuant to Section 1.15 of Regulation 8701 and Section 6.15 of Act 52-2014 ("July 29 Motion to File Under Seal"); requesting that the July 29 Motion and its exhibits be declared privileged and confidential.
- 5. On August 29, 2025 the Energy Board Determined that GPTPR:
 - a. COMPLIED with Section 2.02(A)(1) of Regulation 8701 by submitting the Operational Report Electric Power Companies (Form NEPR-B03), as required in the July 15 Resolution.
 - b. COMPLIED with Section 2.03(B) of Regulation 8701; and WAIVES the filing fee for the Operational Report Electric Power Companies (Form NEPR-B03).
 - c. Is Waived from presenting the 2024 Financial Statements due to the financial reasons presented and supported by the Tax Returns (Exhibit C) and Income Statement (Exhibit D).
 - d. Was Granted confidential treatment of the July 29 Montion and ordered GPTPR to submit a redacted version of the July 29 Montion within 20 days from the notification (i.e. August 29, 2025).

THEREFORE, GPTPR presents the redacted version of the July 29 Motion attached hereto and it respectfully requests that this Honorable Energy Bureau take notice of the foregoing and, most respectfully, that this Honorable Energy Bureau declare the Company has complied with its obligations.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this day I notified this Motion to the Energy Board via the online filing system.

In San Juan, Puerto Rico, today, September 10, 2025.



By: Ana C. Izquierdo Henn, Esq.
RUA 19573
Izquierdo Law LLC
P.O. BOX 361547 San Juan PR 00936
787-236-8894
ana@izquierdolawllc.com

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

IN RE: REQUEST FOR CERTIFICATION
Green Power Technologies Puerto Rico LLC

Case No. NEPR-CT-2024-0004

SUBJECT: Filing of Personal Information
Form. Filing of Gross Revenue Report.
Order to Show Cause pending. Order to file
Operational Report.

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER ISSUED ON
JULY 15, 2025**

TO THE HONORABLE ENERGY BUREAU:

COMES NOW Green Power Technologies Puerto Rico LLC (“GPTPR” or “Company”),
represented by the undersigned counsel, who respectfully informs and requests the following:

Background

1. On June 11, 2024, the Company filed its initial Request for Certification with the Puerto Rico Energy Bureau (“Energy Bureau”), along with various supporting documents, including its Personal Information Form (NEPR-B01), Operational Report (NEPR-B03), a CPA certification of financial capacity, and a request for confidential treatment under Section 1.15 of Regulation 8701.
2. Subsequently, the Energy Board issued several orders requesting clarification and additional information, which the Company has complied.
3. Most recently, the Energy Bureau served notice on July 15, 2025, of a Resolution and Order (“July 15 Order”), whereby it ordered GPTPR to file its yearly Operational Report with its corresponding fees, as well as the FY24 Financial Statements.

Operating Report, Tax Returns, and Yearly Fee

4. In compliance with said order, GPTPR hereby submits the Operational Report, FORM NEPR-B03, attached as **Exhibit A**.
5. As a supplement to the Operational Report and in compliance with Section 2.02 (A)(1)(a-d) of Regulation 8701, we advise that:

- a. **Projection of the percent of total demand to be met (A)(1)(a):** By FY 2030, GPTPR expects to own/operate [REDACTED] of hydropower production, generating [REDACTED] [REDACTED] [REDACTED] Puerto Rico’s annual power

consumption. Based on GPTPR’s technology, this projection is based on the aggregate of hydroelectric units producing between 350kw and 500kw at 8,400 hours (350 days) in a calendar year.

b. Charges, rates, and customer-orientation efforts (A)(1)(b):

i. If successful, GPTPR expects to sell energy via 20 and 25-yr power purchase agreements (“PPA”) to three types of clients.

1. Puerto Rico Electric Power Authority (“PREPA”) through a Public-Private Partnership and with the approval of this Energy Bureau.
2. Puerto Rico Aqueduct and Sewer Authority (“PRASA”);
3. Directly to customers with water resources available; and/or to electric cooperatives for resale to end users.

ii. PPA rates will reflect agreed upon rates between GPTPR and its customers, as well as approved rate by the Energy Bureau, as the case may be. In all instances, the rate will reflect a discount compared to the standard electrical power rate and the savings will increase over the life of the contract. Initial estimates project rates will be between [REDACTED] per kilowatt-hour of electricity produced.

iii. Efforts to orient clients include detailed projections of savings both in terms of operational costs and in resilience benefits.

c. Capital-investment projection for next year (A)(1)(c). GPTPR projects it will invest [REDACTED] in capital expenditures over the next year, segmented as follows.

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

6. Contact information and credentials (A)(1)(d). The Company’s Chief Executive Officer

is M. Josh Collins and his contact information is [REDACTED] [REDACTED] and

josh@VFHTurbine.com. His resume is attached hereto as **Exhibit B**.

7. Additionally, GPTPR has yet to produce electricity and therefore revenue. In fact, it reported a **Net Loss of [REDACTED] in 2024**, as evidenced by the Company's tax returns for 2024, attached as **Exhibit C**.

8. Section 2.02(C) of Regulation 8701 requires that companies intending to operate in Puerto Rico must submit the Operational Report along with the Request for Certification.

9. However, Section 2.03(B) of Regulation 8701 states that:

In cases where, pursuant to the provisions of Subsection (D) of Section 2.02 of this Regulation, the Commission orders an electric service company to submit information to the Commission and said company believes that the payment of the amount corresponding to the fee for the submission of the Operational Report would be onerous, the company in question may request that the Commission waive the requirement to pay the fee for the submission of the Operational Report. In such cases, the company must file, together with the information required by the Commission, a motion wherein it sets forth the facts and explains the legal basis that justifies said waiver of payment.

10. As discussed herein, and acknowledged by the Energy Bureau, the Company reported a Net Loss of [REDACTED]. Also, this pre-revenue Company is projected to invest \$4.88 million in capital expenditures over the next year. [REDACTED]. Furthermore, due to the nature of PPAs, 14 months after executing a deal could elapse before the subsequent revenue generation. **Every dollar counts and additional payments are undue hardship on the Company.**

11. Therefore, considering the Company's lack of revenue and its planned investment of substantial amounts of money, as well as pursuant to Section 2.03(B) of Regulation 8701, GPTPR hereby **submits the Operational Report and humbly requests that \$800 filing fee be waived, as it would be unduly onerous.**

FY2024 Financial Statements

12. Section 4.02 of Regulation 8701 states:

Where the gross revenue of an electric service company for a given fiscal year is equal to or less than three million dollars (\$3,000,000.00), the gross revenue report must be signed by an authorized representative of the electric service company. The signature of the authorized representative shall constitute a sworn certification, under penalty of perjury, that said information is correct and complete. Furthermore, the electric service company must file before the Commission its financial statements as compiled by a Certified Public Accountant (CPA) authorized to practice said profession in Puerto Rico.

13. In the July 15 Resolution and Order, the Energy Bureau determined that GPTPR complied with filing Form NEPR B05, however required it file the FY2024 Financial Statements.

14. As indicated by the Income Tax Returns, GTPR's prior counsel also acted as its accounting firm. [REDACTED]

[REDACTED] **Therefore, given the complexities and ethical nuance of that situation, the Company cannot request prior counsel to prepare the CPA certification for the FY2024 Financial Statements.**

15. As such, GTPR would have to retain a new CPA firm to review work that was already done and create from scratch the compiled Financial Statements, vis-à-vis the prior CPA compiling the Financial Statements from information he had on hand and used to prepare the tax returns. The least expensive quotes obtained so far are close to [REDACTED] to certify an operating loss, which would be unduly onerous to the company at this critical stage in its development.

16. Therefore, the Company has prepared an Income Statement, which is attached as **Exhibit D.**

17. This statement contains all the pertinent information that would be found in the CPA certified FY2024 Financial Statements.

18. Therefore, we respectfully request that this Honorable Energy Board waive the requirement to present a CPA certified compilation of the Financial Statements and that this information be taken as satisfying the FY24 Financial Statements requirement of the July 15 Order.

19. Alternatively, should the Energy Board deem it necessary to present the information certified by a CPA, we request an additional term of thirty (30) days to engage a new CPA firm to complete the work.

Confidentiality

20. Pursuant to Section 1.15 of Regulation 8701 and Section 6.15 of Act 57-2014, the appearing party respectfully requests that this Honorable Energy Bureau GRANT confidential treatment to the Motion and its Exhibits. Specifically, the undersigned requests that all financial statements, tax returns, revenue reports, and supporting schedules be designated as privileged and confidential, and not disclosed to the public or any third party without prior consent or court order. The information for which confidentiality is requested contains sensitive and proprietary financial data, the public disclosure of which could cause competitive harm or constitute an undue invasion of business privacy. This request is made in good faith and in accordance with the applicable regulations governing the treatment of confidential information before the Honorable Energy

Bureau.

21. Accordingly, the petitioner submits a separate motion in support of this request to enclose the relevant documents in a sealed envelope (or electronically labeled as “Confidential”).

Counsel Access to the Electronic Filing System and the Deadline

22. The July 15 Resolution granted a term of ten (10) days to comply. The ten (10) day mark is July 25, 2025.

23. Section 1.09 of Regulation 8701 establishes that whenever a due date for an order is due on a legal holiday, the term is extended to the next workday. We note that pursuant to Act No. 26-2017, as amended, July 25 (Friday) and 27 (Sunday) are each designated a legal holiday. Pursuant to the OATRH’s Special Memorandum No. 23-2024 and Article 387 of the Political Code of 1902, as amended, since the July 27 holiday falls on a Sunday it shall be celebrated on Monday, July 28.

24. Therefore, the deadline to comply with the July 15 Order is automatically extended to July 29, 2025.

25. The undersigned counsel promptly requested docket access under the Electronic Filing System from the Clerk of the Energy Board. However, we have not heard back and still can’t access the same to file this motion before the deadline.

26. Therefore, we submit this Motion, its exhibits and the Motion to File Under Seal via email to secretaria@energia.pr.gov and via certified mail to World Plaza Building 268 Muñoz Rivera Ave, San Juan, PR. 00918. Once we are granted access to the Electronic Filing System, we will also file the documents therein.

WHEREFORE, it is respectfully requested that this Honorable Energy Bureau take notice of the foregoing and, most respectfully, that this Honorable Energy Bureau:

- a. Declare the Company has complied with its obligations to submit its Operating Report;
- b. Waive the \$800 filing fee for the Company’s Operating Report;
- c. Accept the Income Statement and Tax Returns in lieu of the CPA certified FY2024 Financial Statements; and
- d. Grant confidential treatment to the Motion and its Exhibits.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this day I notified this Motion to the Energy Board via email to its Clerk to the following e-mail address: secretaria@energia.pr.gov.

In San Juan, Puerto Rico, today, July 25, 2025.


By: Ana C. Izquierdo Henn, Esq.
RUA 19573
Izquierdo Law LLC
P.O. BOX 361547 San Juan PR 00936
787-236-8894
ana@izquierdolawllc.com



GOVERNMENT OF PUERTO RICO

Public Service Regulatory Board
Puerto Rico Energy Bureau

FORM

OPERATIONAL REPORT
ELECTRIC POWER COMPANIES☒ New Report☐ Report Update

Instructions:

- When filling out this form, examine the provisions of Section 2.02 of Regulation No. 8701 and be sure to provide all the required information.
- Indicate N/A where the information is not applicable.
- Use Complementary Sheet (NEPR-Z01) if additional space is required.
- Include the required documents according to the Regulation No. 8701, enumerated in the Annexes section.
- Present a copy of the payment evidence when submitting this Form.

A. Electric Power Company General Information

1. Company Name: Green Power Technologies Puerto Rico LLC

☒ Fossil fuel or renewable energy generation with aggregated capacity of one hundred (100) MW or less☐ Fossil fuel or renewable energy generation with aggregated capacity of more than one hundred (100) MW

2. Type of Electric Service:

☐ Distributed Generators with aggregated capacity of one (1) MW or more☐ Energy Storage☐ Energy Resale☐ Electric Power Billing☐ Wheeling

B. Operational Report General Information

☐ This report ***has been referred to*** the Energy Public Policy Program of the Department of Economic Development and Commerce for review and comments prior to its filing before the Energy Bureau.☒ This report ***has not been referred to*** the Energy Public Policy Program of the Department of Economic Development and Commerce for review and comments prior to its filing before the Energy Bureau. (Explain the reasons for not referring the report to the EPPP.)

This report has not been referred to the EPPP because operations have not yet fully commenced and Green Power Technologies Puerto Rico LLC is still pre-revenue and in the business development phase.



Edificio World Plaza, 268 Ave. Muñoz Rivera, Suite 202 (Nivel Plaza), Hato Rey P.R. 00918

Tel. 787.523.6262 • www.energia.pr.gov

Annexes: (Mark the documents included with the Operational Report Form)

- Distributed Generators with aggregated capacity of one (1) MW or more, and fossil fuel or renewable energy generation with aggregated capacity of one hundred (100) MW or less:
 - ☐ Projection of the percent of the total demand that it intends to meet in Puerto Rico (Section 2.02 (A)(1)(a)).
 - ☐ Information regarding charges and rates, and the company efforts to orient clients and promote efficient electric energy consumption (Section 2.02 (A)(1)(b)).
 - ☐ Projection of capital investments for the next year after the submission of the Report (Section 2.02 (A)(1)(c)).
 - ☐ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(1)(d)).

- Fossil fuel or renewable energy generation with aggregated capacity of more than one hundred (100) MW:
 - ☐ Information required in Section 2.02 (A)(2)(a).
 - ☐ Operational budget for the current fiscal year (Section 2.02 (A)(2)(b)).
 - ☐ Reports of the changes the company foresees, plans for, or envisages in its operational budget for the following three (3) years (Section 2.02 (A)(2)(c)).
 - ☐ Studies regarding the cost of electric services the company provides (Section 2.02 (A)(2)(d)).
 - ☐ Studies and reports about the average frequency (hertz) of the electric power system during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(e)).
 - ☐ Reports regarding operation and maintenance during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(f)).
 - ☐ Reports about the electric power outages that have occurred during the three (3) fiscal years prior to the submission of the Report (Section 2.02 (A)(2)(g)).
 - ☐ Reports regarding requests for wheeling (Section 2.02 (A)(2)(h)).
 - ☐ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(2)(i)).

- Energy Storage:
 - ☐ Projection of capital investments for the next three (3) years after the submission of the Report (Section 2.02 (A)(3)(a)).
 - ☐ Reports regarding improvements on the electric power system behavior (Section 2.02 (A)(3)(b)).

- Electric Power Billing or Resale:
 - ☐ Description of the service and an estimate of the quantity of clients to which the service will be provided (Section 2.02 (A)(4)(a)).
 - ☐ Information regarding charges and rates of the company (Section 2.02 (A)(4)(b)).
 - ☐ Contact information and credentials of the entity to be hired in case that the system operation is contracted (Section 2.02 (A)(4)(c)).

- Wheeling:
 - ☐ Projection of the percent of the total demand that it intends to meet in Puerto Rico (Section 2.02 (A)(5)(a)).
 - ☐ Projection of capital investments for the next three (3) years after the submission of the Report (Section 2.02 (A)(5)(b)).
 - ☐ Reports regarding requests for energy transmission or wheeling (Section 2.02 (A)(5)(c)).
 - ☐ Complementary Sheet (NEPR-Z01).
 - ☐ Other: _____

I certify that the presented information on this form is correct and complete.

Ana Izquierdo Henn, Esq.

Authorized Representative

Ana C Izquierdo Henn

7/25/25

Name of Designated Contact

Position

Signature

Date

Contact

www.linkedin.com/in/michael-josh-collins-1b7837b (LinkedIn)

Top Skills

Commissioning
Project Planning
Process Improvement

Michael (Josh) Collins

Chief Executive Officer, Green Power Technologies Puerto Rico LLC
Athens, Georgia, United States

Summary

Twenty plus years of experience in Environmental Health & Safety, Power Plant O&M, Construction Staffing, Business Development, Sales and Project Management.

Experience

Green Power Technologies Puerto Rico LLC

Chief Executive Officer

June 2022 - Present (3 years 2 months)

Green Power Technologies Puerto Rico LLC

Our mission is to provide affordable and reliable clean energy technology to emerging markets and remote regions where alternative energy solutions are expensive or undesirable. We accomplish this mission through installation projects of The VFH Turbine™, a decentralized hydroelectric turbine that allows facilities and establishments to own, generate, and use renewable energy.

Our team of experts and industry partners have distinguished careers as leaders in environmental applications worldwide. Our team consists of established suppliers of parts and services in Canada, Central and South America, and the United States. Clientele includes dozens of major power companies, US Army Corps, US Department of Defense, GSA, numerous municipalities, various manufacturing facilities, and individually owned and operated hydropower generating stations. From manufacturing to design, our highly trained professionals have been handpicked from among the best in the industry. We are ready to supply you with the solutions you need – as well as the quality you deserve.

Classic City Ventures, LLC

Owner

December 2014 - Present (10 years 8 months)

1290 Greensboro Hwy, Watkinsville, GA 30677

Holding company of restaurant, staffing and retail assets including Classic City Eats of Oconee County / Watkinsville, GA.

Decca Energy, Inc.
Business Owner / Business Development Consultant
February 2013 - January 2018 (5 years)
Southeast

Decca Energy is a staff augmentation company specializing in commercial to utility scale project management and construction support for power & oil projects. This relationship began as a profitable Remedy Intelligent Staffing Franchise owned from 2013 to 2016. Fossil generation, oil & renewable placements merged under Decca in early 2016.

Express Integrated Technologies
Vice President, Sales & Marketing
February 2014 - December 2014 (11 months)
Tulsa, Oklahoma Area

Position focused on improving the Domestic Sales Force for all of EIT's product offerings (engineering, design and fabrication of heat transfer, industrial equipment and environmental compliance technologies for Steam Generation, Emissions Reduction for Combustion Turbines and various Waste Heat Recovery applications). Canadian OTSG market significantly weakened during this year and the company dissolved in 2017

Babcock Power
Regional Sales Director, Southern Region
January 2009 - January 2013 (4 years 1 month)
Chattanooga, Tennessee Area

Responsible for domestic corporate sales of all Babcock Power Inc. (BPI) Business Units for the South Region (12 states from NC to TX). Promoted from District Sales Manager to Regional Director in less than two years. Territory boasted annual sales over \$250 million. Region booked over 150% of goal in 2012, 130% in 2011. Directly responsible for first major foreign fabrication project sold through Babcock Power Services (contract value of > \$30 million). Developed multiple alliances with key utility clients. Led the evolution of a single corporate sales team replacing multiple business unit sales forces.

Tennessee Valley Authority
Project Manager
January 2004 - January 2009 (5 years 1 month)
Chattanooga, Tennessee Area

Commissioned the Paradise Unit 3 FGD in 2006 with closeout Project Manager Role in January 2007 for the entire Paradise FGD Project (completed

on schedule and within budget ~\$272 million). Responsible for contract oversight of FGD installations through the study, design, construction and commissioning phases. Managed the construction of the largest temporary cooling tower installation in America at Cumberland Fossil Plant.

Progress Energy

Shift Supervisor / Sr. Environmental Analyst

August 1999 - January 2004 (4 years 6 months)

Florida / North Carolina

Supervised O&M shifts comprised of bargaining unit employees operating two 750 MW coal-fired steam units. Developed site Key Performance Indicators and contributed to the project planning and execution of Bailey DCS control upgrades. Managed significant improvements of 20% increase in Commercial Availability and 8% decrease in Emergency Forced Outage Rate over a three-year span with zero environmental violations and achievement of all corporate incentive goals during that time.

Sr. Analyst, Environmental, Crystal River, FL- July 2001 to January 2002

Directed environmental regulatory compliance programs and managed several environmental enhancement projects after identifying risks for a mega coal fired facility.

Sr. Analyst, Environmental, Asheville, NC - December 1999 to July 2001

Directed environmental regulatory compliance programs and executed risk communication efforts to community, political, regulatory and activist leaders.

Analyst, Environmental, Raleigh, NC- August 1999 to December 1999

Supported the C.E.M.S. Team and Environmental Audit Department. Directed the environmental & safety support during the H.F. Lee Plant flood recovery in 1999.

University of Georgia

Graduate Assistant

September 1997 - August 1999 (2 years)

Analyzed community exposure to PM, PAHs and VOCs released during the remediation and in-situ treatment of contaminants at the site of a former manufactured gas plant.

Georgia Power Company

Industrial Hygienist

June 1997 - September 1997 (4 months)

Conducted hazard evaluations, exposure assessments and safety training.

Education

The University of Georgia

Master of Science - MS, Environmental Health Sciences · (1997 - 1999)

The University of Georgia

Bachelor of Science, Environmental Health Sciences · (1995 - 1997)

Georgia Southern University

Undergrad, Industrial Operations · (1993 - 1995)

Exhibit C. GREEN POWER TECHNOLOGIES PUERTO RICO LLC

2024 Income Tax Return

This file is under Seal pursuant to Article 6.15 of Act 57-2014 and Section 1.15 of Regulation 8701 and In Re: Policy on Management of Confidential Information in Procedures Before the Commission, CEPR-MI-2016-0009, August 31, 2016, Resolution.

Exhibit D. GREEN POWER TECHNOLOGIES PUERTO RICO LLC

2024 Income Statement

This file is under Seal pursuant to Article 6.15 of Act 57-2014 and Section 1.15 of Regulation 8701 and In Re: Policy on Management of Confidential Information in Procedures Before the Commission, CEPR-MI-2016-0009, August 31, 2016, Resolution.

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

IN RE: REQUEST FOR CLARIFICATION
Green Power Technologies Puerto Rico LLC

Case No. NEPR-CT-2024-0004

SUBJECT: Filing of Personal Information
Form. Filing of Gross Revenue Report.
Order to Show Cause pending. Order to file
Operational Report.

MOTION TO FILE UNDER SEAL TO PROTECT CONFIDENTIAL INFORMATION
PURSUANT TO SECTION 1.15 OF REGULATION 8701 AND SECTION 6.15 OF ACT
57-2014

TO THE HONORABLE ENERGY BUREAU:

COMES NOW Green Power Technologies Puerto Rico LLC (“GPTPR” or “Company”),
represented by the undersigned counsel, who respectfully informs and requests the following:

- On this date, the Company has filed a *Motion in Compliance* with the July 15, 2025,
Resolution and Order from the Honorable Energy Bureau (“Motion”).
- By its very nature, said Motion and its Exhibits contain sensitive, confidential and
private information of the Company such as financial and tax information regarding its operations,
business dealings and intellectual property.
- Pursuant to Section 1.15 of Regulation 8701, the Honorable Energy Bureau is
required and mandated to treat such information as confidential and that any filing containing such
information can be marked as “privileged or confidential” by filing a motion detailing the legal
and factual basis. Additionally, Section 6.15 of Act No. 57-2014, as amended, instructs that the
Honorable Energy Bureau to treat financial and proprietary business information as confidential
if, upon review, it determines disclosure would harm the submitter’s legitimate interests.
- The information for which confidentiality is requested contains sensitive and
proprietary financial data, the public disclosure of which could cause competitive harm or
constitute an undue invasion of business privacy.
- The undersigned requests that the Motion and its Exhibits, be designated as
privileged and confidential, and not disclosed to the public or any third party without prior consent
or order.
- This request is made in good faith and in accordance with the applicable regulations
governing the treatment of confidential information before the Honorable Energy Bureau.

7. The undersigned respectfully requests that the Honorable Energy Bureau evaluate and resolve this request prior to any public disclosure, in accordance with the procedure established in Regulation 8701, Section 1.15(B).

WHEREFORE, it is respectfully requested that this Honorable Energy Bureau take notice of the foregoing and, most respectfully, that this Honorable Energy Bureau **GRANT** this motion, declaring the contents of the *Motion in Compliance* filed today, as well as its exhibits, as “privileged and confidential”.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on this day I notified this Motion to the Energy Board via email to its Clerk to the following e-mail address: secretaria@energia.pr.gov.

In San Juan, Puerto Rico, today, July 25, 2025.



By: Ana C. Izquierdo Henn, Esq.
RUA 19573
Izquierdo Law LLC
P.O. BOX 361547 San Juan PR 00936
787-236-8894
ana@izquierdolawllc.com