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

Sep 24, 2025

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IN RE:

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY PERMANENT RATE

CASE NO. NEPR-MI-2020-0001

SUBJECT: LUMA's Submission of Responses to Request for Information in Compliance with Order Entered on September 19, 2025 and Request for Extension of Time to Supplement

SUBMISSION OF RESPONSES TO REQUEST FOR INFORMATION IN COMPLIANCE WITH ORDER ENTERED ON SEPTEMBER 19, 2025 AND REQUEST FOR EXTENSION OF TIME TO SUPPLEMENT

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and LUMA Energy Servco, LLC (jointly referred to as the "LUMA"), through the undersigned counsel, and respectfully state and request the following:

- 1. On September 15, 2025, filed before the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") a document titled *Motion Submitting FCA and PPCA Reconciliations for July and August 2025, FCA, PPCA, and FOS Calculated Factors and Memorandum of Law in Support of Confidential Treatment* ("September 15 Motion"), through which it submitted its proposed reconciliation of the Fuel Charge Adjustment ("FCA") and the Purchased Power Charge Adjustment ("PPCA") costs for July and August 2025 and the proposed FCA, PPCA and the Fuel Oil Subsidy factors to be implemented starting October 1, 2025.
- 2. On September 19, 2025, the Energy Bureau issued a Resolution and Order ("September 19 Order") directing LUMA and Genera PR LLC ("Genera") to respond to various Requests for Information ("RFIs") included as Attachment A to said Order.
- 3. Promptly upon receipt of the September 19 Order, LUMA initiated coordination efforts with Genera to ensure the RFIs would be addressed in an organized and timely manner.

- 4. Pursuant to the parties' agreement, LUMA will submit responses to RFIs numbered 1.1 through 1.2 and 1.6 through 1.16. Genera will submit responses to RFIs numbered 1.3 through 1.5.
- 5. With respect to RFIs 1.1 and 1.2, LUMA is providing preliminary data at this time, subject to further analysis and revision. Given the complexity and level of detail of the information requested, the data must be thoroughly verified and confirmed before LUMA can affirm that it is final and complete.
- 6. For RFI 1.12, LUMA is presenting a table identifying invoice numbers and associated costs. LUMA is actively gathering all relevant invoices to provide a comprehensive response. However, due to the short time frame provided to comply with the September 19 Order, LUMA has not yet been able to complete the compilation and review of all responsive materials.
- 7. LUMA respectfully requests until Friday at 5:00 p.m. to supplement its responses to RFIs 1.1, 1.2, and 1.12 as described herein. The limited time afforded by the September 19 Order has not allowed LUMA to complete the extensive data verification and the necessary document compilation to ensure the accuracy and completeness of its responses. LUMA is making every effort to comply as expeditiously as possible, but the scope and detail of the information required, particularly for technical and financial data, necessitate additional time to minimize the risk of inadvertent errors or omissions.
- 8. LUMA respectfully submits that granting this brief extension is essential to ensure that the Energy Bureau receives accurate, reliable, and fully substantiated information, consistent with the intent of the Order and the interests of all parties.

WHEREFORE, LUMA respectfully requests that the Energy Bureau find that LUMA has partially complied with the September 19 Order and grants until Friday, September 26 at 5:00 pm to supplement responses to 1.1, 1.2 and 1.12.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 24th day of September 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; Alexis Rivera, arivera@gmlex.net; Juan M. Martínez Nevárez, jmartinez@gmlex.net; and Juan R. González Galarza, jgonzalez@gmlex.net; to Genera PR, LLC through: Luis Roman Negrón, lrn@roman-negron.com; legal@genera-pr.com; and to the Independent Consumer Protection Office, through Director Hannia Rivera, hrivera@jrsp.pr.gov.



DLA Piper (Puerto Rico) LLC 500 Calle de la Tanca, Suite 401 San Juan, PR 00901-1969 Tel. 787-945-9107 Fax 939-697-6147

/s/ Margarita Mercado Echegaray Margarita Mercado Echegaray RUA NÚM. 16,266 margarita.mercado@us.dlapiper.com

Attachment A