

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

IN RE: REQUEST FOR CERTIFICATION
AES Ilumina, LLC

CASE NO.: CEPR-CT-2016-0010

SUBJECT: Credentials of Contracted
Company Request.

NEPR

Received:

Sep 25, 2025

4:59 PM

MOTION SUBMITTING RESPONSES TO THE ORDER OF AUGUST 7TH

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, AES Ilumina, LLC ("AES Ilumina" or the "Company"), represented by the undersigned attorneys, and very respectfully states and prays as follows:

1. On August 7, 2025, the Puerto Rico Energy Bureau ("Energy Bureau") entered and issued a Resolution and Order (the "August 7th Order") in Case No. CEPR-CT-2016-0010, requiring AES Ilumina to submit the credentials of the entity contracted to operate its system, in accordance with Section 2.02(A)(1)(d) of Regulation 8701¹ (the "Request").

2. On August 22, 2025, AES Ilumina filed a *Motion for Extension of Time to Respond to the Request for Certification*, seeking additional time to submit its response to the Request.

3. On August 29, 2025, the Energy Bureau issued a Resolution and Order granting AES Ilumina until September 5, 2025, to comply with the August 7th Order.

4. On September 4, 2025, the Company filed a *Motion for Additional Extension of Time to Submit Response to the Request for Certification*.

5. On September 10, 2025, the Energy Bureau issued a Resolution and Order granting AES Ilumina until September 25, 2025, to comply with the August 7th Order.

6. AES Ilumina hereby, within the time allowed, submits its response to the Request. The response to each specific question listed in the Request is provided in the document labeled as **Exhibit 1** – attached hereto.

7. Additionally, AES Ilumina respectfully requests confidential treatment for specific portions of its responses because they contain personally identifiable employee information and competitively sensitive business information. The confidential materials include,

¹ Amendment to Regulation No. 8618, on Certifications, Annual Feed and Operational Plans of Electric Service Providers in Puerto Rico, February 17, 2016 ("Regulation 8701").

without limitation: employee names, job titles, résumés, professional licenses, and experience summaries for the Plant Manager and supporting personnel. Public disclosure would invade personal privacy, compromise employee security, and cause substantial competitive harm by undermining AES Ilumina's bargaining position and exposing internal business methods, without advancing any cognizable public interest.

8. In accordance with Section 6.15 of Act No. 57-2014 and the Energy Bureau's Policy on Management of Confidential Information (CEPR-MI-2016-0009), AES Ilumina submits public (redacted) and confidential (unredacted) versions of its responses and respectfully requests that access to unredacted materials be strictly limited to authorized representatives subject to appropriate nondisclosure protections, as permitted by applicable law.

9. Furthermore, AES Ilumina requests this Energy Bureau to preserve the confidentiality of **Exhibit 1** both during the evaluation and after its conclusion or determination, consistent with Act No. 57-2014 and the Energy Bureau's *Policy on Management of Confidential Information in Procedures Before the Commission*, issued on August 31, 2016, and amended on September 21, 2016.

10. Finally, AES Ilumina informs the Energy Bureau that within the next ten (10) days, it will submit the corresponding Memorandum of Law in support of its request for confidential treatment of specific portions of **Exhibit 1**.

WHEREFORE, AES Ilumina respectfully requests the Honorable Energy Bureau to take notice of the above and, consequently: (i) accept the responses submitted herein as compliant with the August 7th Order; ii) grant confidential treatment to the designated portions of the response in **Exhibit 1**, in accordance with applicable laws and regulations; (iii) grant such other and additional relief as the Energy Bureau deems just and proper; and (iv) **that the Energy Bureau provide notice of any communications, notices, or orders in this proceeding to the undersigned attorneys of record.**

RESPECTFULLY SUBMITTED.

We hereby certify we filed this Motion using the electronic filing system of this Energy Bureau.

In San Juan, Puerto Rico, on September 25, 2025.

[SIGNATURES IN THE NEXT PAGE]

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