

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

Junta Reglamentadora  
de Servicio Público

SEP 26 2025

Secretaría  
Negociado de Energía

**IN RE:** LUMA'S ACCELERATED  
STORAGE ADDITION PROGRAM  
("ASAP")

**CASE NO.:** NEPR-MI-2024-0002

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**SUBJECT:** Motion regarding Order to Show  
Cause for Failure to Execute Phase 1  
Standard Offer Agreements, dated September  
19, 2025.

**MOTION FOR EXTENSION OF TIME**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

**COMES NOW, San Fermín Solar Farm, LLC** ("San Fermín"), through its legal representation, and respectfully states, alleges and prays as follows:

1. On September 19, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Bureau") issued an *Order to Show Cause* (the "Order") in the above captioned case.
2. Although San Fermín has previously responded to an order issued by the Bureau requesting information in this case, San Fermín is not a party or intervenor in it.
3. The Order was notified to LUMA and other entities on September 19, 2025, but it was not notified to San Fermín.
4. On September 25, 2025, the Order was notified via email by the Bureau to the legal representatives of San Fermín.
5. The Order requires a response from San Fermín within three (3) business days from the date of notification. Based on the date in which the Order was notified to San Fermín's legal representatives, the due date for a response would be Tuesday, September 30<sup>th</sup>.
6. San Fermín and its representatives are acting diligently and have promptly initiated the necessary actions and taken the procedural steps to provide a prompt and accurate response.
7. Nevertheless, due to the working schedules amongst the persons handling the matter, San Fermín anticipates that additional time will be required to provide an adequate response to the Order.

8. Therefore, San Fermín respectfully requests an extension of ten (10) additional days counted from Tuesday, September 30<sup>th</sup>, to file its response to the Order. This is until Friday, October 10, 2025.

9. This request is made in good faith to ensure and solely for the purpose of ensuring an accurate and timely response from San Fermín.

**WHEREFORE, San Fermín Solar Farm, LLC**, respectfully requests that the Bureau to take notice of the foregoing and grant San Fermín a ten (10) day extension, until October 10, 2025, to comply with the Order.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, this September 26<sup>th</sup>, 2025.

**O'NEILL & BORGES LLC**  
***SAN FERMÍN SOLAR FARM, LLC,***

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