

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

**NEPR**

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

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

**MOTION TO DISQUALIFY COUNSEL**

**TO THE HONORABLE ENERGY BUREAU,**

**COMES NOW**, the Puerto Rico Electric Power Authority, through its undersigned legal counsel and, very respectfully, states and prays as follows:

**I. Introduction**

1.1. For several years, up until October 2023, PREPA's primary legal advisor and counsel was the law firm of Díaz & Vázquez Law Offices, P.S.C. ("Díaz & Vázquez"). Among the primary attorneys from Díaz & Vázquez that represented PREPA were Maraliz Vázquez-Marrero, a named partner of the firm, and Giuliano Vilanova-Feliberti.

1.2. Ms. Vázquez-Marrero was counsel of record for PREPA in multiple cases before the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau"). See *for example* NEPR-MI-2019-0007; NEPR-MI-2022-0005; NEPR-MI-2020-0019. Additionally, Ms. Vázquez-Marrero provided legal advice to PREPA in connection with extrajudicial controversies between PREPA and Genera PR, LLC ("Genera") involving the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement dated as of January 24, 2023.

1.3. Mr. Vilanova-Feliberti also represented PREPA in multiple cases

before the Energy Bureau. See for example NEPR-RV-2020-0049; NEPR-RV-2019-0125; NEPR-QR-2019-0149.

1.4. While serving as counsel for PREPA, Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti obtained access to privileged and confidential information concerning PREPA's legal strategies, regulatory positions, and sensitive administrative records, including materials directly related to cases and matters involving Genera.

1.5. Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti's involvement was not limited to the cases in which they formally appeared on behalf of PREPA. Both worked hand-in-hand with PREPA's Department of Legal Affairs across many, if not all, of PREPA's legal matters. In doing so, they gained extensive access to PREPA's confidential information which are directly implicated in the above-captioned case.

1.6. After October 2023, Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti founded a new firm called Vázquez & Vilanova Law Firm LLC ("Vázquez & Vilanova").

1.7. On July 16, 2025, before filing their *Notice of Appearance and Request for Notice*, Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti, acting on behalf of Genera, participated in and led the required meet-and-confer with PREPA's counsel regarding Genera's objections to PREPA's ROI #PREPA-of-GENERA-PROV-9, which concerned the provisional rate increase requested by Genera.

1.8. On July 23, 2025, Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti, under their new firm of Vázquez & Vilanova, filed a *Notice of Appearance and Request for Notice* in the above-captioned case, on behalf of Genera.

1.9. Although it was not notified to PREPA,<sup>1</sup> PREPA recently learned that on August 21, 2025, Genera, represented by Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti, filed a document titled “Motion to Compel the Puerto Rico Electric Power Authority to file responsive answers to ROI GENERA-of-PREPA-FIN-1 regarding the \$683 Million Energy Sector Reserve” (“*Motion to Compel*”).

1.10. In the *Motion to Compel*, Genera, through its counsels Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti, alleges that PREPA's response to ROI GENERA-of-PREPA-FIN-1 “is intentionally evasive”, further asserting that PREPA's response is “difficult to believe”.

1.11. During the September 4, 2025 technical hearing in this case, Ms. Vázquez-Marrero cross-examined PREPA's Comptroller, Juan Carlos Adrover, a witness who she had previously met and strategized with as counsel for PREPA, regarding his response to ROI GENERA-of-PREPA-FIN-1. In doing so, she pressed the point that PREPA's professed lack of knowledge about the Energy Sector Reserve at issue in that ROI was difficult to believe.

1.12. PREPA respectfully moves the Energy Bureau to disqualify Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti from representing Genera in the above-captioned Rate Case for the reasons stated herein.

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<sup>1</sup> The lack of notification to PREPA of the *Motion to Compel*, either directly by Genera or the Accion platform, was addressed in a separate motion filed by PREPA on September 4, 2025.

## II. Applicable law

### a. Canon 21 of the Puerto Rico Code of Professional Ethics

2.1. Canon 21 of the Code of Professional Ethics, 4 L.P.R.A. App. IX, categorically provides that “[t]he lawyer has the obligation to represent his client with **complete loyalty**.” P.R. Fuels, Inc. v. Empire Gas Co., 133 D.P.R. 112 (1993); In re Belén Trujillo, 126 D.P.R. 743 [26 P.R. Offic. Trans. \_\_\_\_] (1990). The obligation to represent with loyalty includes not disclosing secrets or confidences and taking adequate measures to prevent such disclosure.

2.2. **Consequently, representation of a client in matters adversely affecting an interest of a former client cannot be accepted, even if both clients consent thereto.** P.R. Fuels, Inc. v. Empire Gas Co., 133 D.P.R. 112 (1993). Thus, there is no doubt that Canon 21 prohibits both simultaneous and successive representation, as long as there is in the latter representation a “**substantial relation**” between the former matter and the latter matter that **implies adverse interests**. Id. According to this formula with regard to successive representation, the client need only show that the legal issue of the case where the lawyer appears against him was **substantially related** to the cause of action in which the attorney formerly represented him. Id. **The client need not show an actual violation of the confidentiality principle. Id. It suffices that a former attorney-client relationship exists and that the same be adverse and substantially related to the previous cause of action.** Id.; In re Carreras Rovira y Suárez Zayas, 115 D.P.R. 778, 791-792 [15 P.R. Offic. Trans. 1027, 1044] (1984).

2.3. In short, Canon 21 bans representation **if there exists a possibility of conflict of interest.** P.R. Fuels, Inc. v. Empire Gas Co., 133 D.P.R. 112 (1993); In re Belén Trujillo, 126 D.P.R. 743 [26 P.R. Offic. Trans. \_\_\_\_] (1990); In re Carreras Rovira y Suárez Zayas, 115 D.P.R. 778 [[15 P.R. Offic. Trans. 1027] (1984). The test to detect this involves a determination of whether by representing the interests of a client in a case, a lawyer's subsequent representation of another client in one substantially related to the first, may be understood as a switch in sides. P.R. Fuels, Inc. v. Empire Gas Co., 133 D.P.R. 112 (1993).

***b. Motion for disqualification of counsel***

2.4. The Puerto Rico Supreme Court has held that motions for disqualification do not in themselves constitute disciplinary actions, but rather preventive measures to avoid possible violations of the canons of professional ethics. K-Mart Corp. v. Walgreens of P.R., Inc., 121 D.P.R. 633, 637 (1988).

2.5. Since motions for disqualification constitute preventive measures, **it is not necessary to provide proof of an ethical violation for them to proceed.** Liquilux Gas Corp. v. Berríos Zaragoza, 138 D.P.R. at 864-66.

2.6. In these cases, **“the appearance of impropriety will be used to resolve any doubts that arise about a possible conflict of interest, in favor of disqualification.”** Liquilux Gas Corp. v. Berríos Zaragoza, 138 D.P.R. at 864-66; In re Carreras Rovira y Suárez Zayas, *supra*, p. 792.

2.7. When evaluating a motion for disqualification, the courts, and by analogy administrative agencies, have the duty to weigh the conflicting interests.

In that process, elements must be considered such as: (a) whether the party requesting disqualification has standing to invoke it; (b) the seriousness of the conflict of interest involved; (c) the complexity of the law or facts pertinent to the controversy, and the expertise of the attorneys involved; (d) the stage of the proceedings when the controversy over disqualification arises and its possible effect on the fair, prompt, and economical resolution of the case, and the purpose behind disqualification; that is, whether the motion for disqualification is being used as a procedural mechanism to delay the proceedings. Liquilux Gas Corp. v. Berríos Zaragoza, 138 D.P.R. at 864-66. See also: Ramos de Szendrey, supra, and Fed. Pesc. Playa Picúas v. U.S. Inds., Inc., 135 D.P.R. 303, 327 (1994), concurring in part and dissenting in part opinion issued by Associate Justice.

### **III. Discussion**

3.1. As explained in the preceding paragraphs, while serving as counsel for PREPA in multiple cases before this Energy Bureau—and working hand-in-hand with PREPA's Department of Legal Affairs on most, if not all, of PREPA's legal matters—Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti obtained extensive access to privileged and confidential information, including PREPA's legal strategies, regulatory positions, and sensitive administrative records across a wide range of matters, which include issues directly involving Genera.

3.2. The Motion to Compel and the cross-examination—particularly the assertion by PREPA's former counsel that PREPA's response is "intentionally evasive" and their suggestion that PREPA is being dishonest—demonstrates

beyond doubt that Genera's interests in this proceeding are directly adverse to those of PREPA, rendering the ethical conflict of these attorneys both evident and unavoidable.

3.3. By permitting Genera's counsel to cross-examine PREPA during the technical hearing, the Hearing Examiner necessarily acknowledged that Genera's interests in this case are adverse to PREPA's, as the Hearing Examiner has previously characterized cross-examination as "inherently adversarial." See *Hearing Examiner's Order Clarifying PREPA's Role in the Rate Case Evidentiary Hearing* issued on July 21, 2025, in the above-captioned case.

3.4. Moreover, the unfounded allegations advanced by PREPA's former counsels against PREPA itself create a profound appearance of impropriety which shall "**be used to resolve any doubts that arise about a possible conflict of interest, in favor of disqualification.**" Liquilux Gas Corp. v. Berríos Zaragoza, 138 D.P.R. at 864-66; In re Carreras Rovira y Suárez Zayas, *supra*, p. 792.

3.5. PREPA, as the party directly affected by the conflicted representation of its former counsel, unquestionably has standing to request disqualification. The attorneys in question—Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti—represented and advised PREPA in most, if not all, legal matters, including cases before the Energy Bureau, until as recently as October 2023. They now appear in the same forum with direct attacks against PREPA, representing their new client, Genera. PREPA has both a legal and institutional

interest in protecting its confidential information, litigation strategies, and regulatory posture from being used against it.

3.6. Moreover, PREPA not only has standing to move for disqualification to safeguard its confidential and privileged information, but also to shield itself from the very real appearance of impropriety that arises when its former attorneys now take the position of publicly challenging PREPA's veracity in this proceeding. The risk is not abstract; it strikes directly at the integrity of the adjudicative process and threatens to erode confidence in PREPA's ability to defend its interests on a level playing field.

3.7. When PREPA's former attorneys take the position of publicly contesting the truth of PREPA's assertions in this proceeding, the result is not only a profound appearance of impropriety but also a direct threat to PREPA's integrity as a litigant and ability to defend itself.

3.8. Moreover, these highly improper allegations do not remain confined within the four corners of the litigation record; they inevitably spill over into the broader public sphere, where PREPA's credibility as a public corporation is constantly under scrutiny. By suggesting that PREPA is intentionally hiding information in this case –an allegation that PREPA categorically and unequivocally denies–, its former counsels compromise not only the fairness of this adjudicative process but also PREPA's standing in the eyes of regulators, creditors, and the public it serves.<sup>2</sup> PREPA thus has every right to seek

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<sup>2</sup> See for example the following excerpt from the news article published by El Nuevo Día on September 5, 2025, titled “AEE dice no saber nada sobre reserva de \$683 millones que se asignaría



disqualification, both to protect its confidential and privileged information and to guard against the irreparable reputational harm that it has suffered as a result of its former counsels divided loyalties.

3.9. The foregoing makes it clear that the conflict of interest here is both direct and severe. Additionally, there can be no serious dispute that both attorneys possess intimate knowledge of PREPA's confidential legal posture, knowledge that could readily be wielded to Genera's advantage and to PREPA's prejudice in this proceeding.

3.10. Genera will not be harmed by the disqualification. As the record shows, Genera is already represented in this proceeding by additional counsel, Jorge Fernández Reboredo, an experienced practitioner who is fully capable of continuing to represent Genera without any conflict of interest. Accordingly, the disqualification of Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti will not unduly prejudice Genera's ability to be represented effectively, and is necessary to preserve the fairness and integrity of the process.

3.11. The conflict arose at an early stage of the proceeding, such that disqualification will neither unfairly prejudice Genera - already represented by other counsel in this case - nor unduly delay resolution of the Rate Case. By

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para pagar deuda y pensiones" (<https://www.elnuevodia.com/noticias/locales/notas/aee-dice-no-saber-nada-sobre-reserva-de-683-millones-que-se-asignaria-para-pagar-deuda-y-pensiones/>) which quotes Ms. Vázquez-Marrero and describes her statement against PREPA as follows: " '**Es increíble** que, de una cuenta de esta naturaleza, que posiblemente pueda usarse para pensiones, emergencias y otros asuntos del sector de energía, la AEE no tenga conocimiento alguno', cuestionó la abogada de Genera PR Maraliz Vázquez Marrero, durante la vista tarifaria del jueves".) (emphasis added).

contrast, denying disqualification would compel PREPA to defend itself against its own former attorneys, thereby tainting the record, undermining the fairness of the process, and placing PREPA at an unjust and unwarranted disadvantage.

3.12. This motion is not a tactical maneuver designed to delay these proceedings. Rather, it is a necessary and compelled response to the actions of PREPA's former attorneys, who have openly challenged PREPA's credibility and, in doing so, have tainted its reputation and public image. PREPA is left with no alternative but to seek disqualification to protect its privileged information, preserve the integrity of this adjudicative process, and vindicate the ethical standards imposed by Canon 21 and the jurisprudence of the Puerto Rico Supreme Court, which require from Ms. Vázquez-Marrero and Mr. Vilanova-Feliberti nothing less than "complete loyalty" to PREPA.

#### **IV. Conclusion**

4.1 Taken together, these factors make disqualification not merely appropriate but unavoidable. The conflict is profound, inescapable, and fatally undermines PREPA's ability to defend its interests fairly in the Rate Case. PREPA's former attorneys now seek to represent Genera, employing antagonistic and adverse tactics against their former client.

4.2 Allowing such representation would jeopardize the integrity of this proceeding, create an intolerable appearance of impropriety, and erode public trust in the impartiality of the Energy Bureau's adjudication. More broadly, it would strike at the heart of confidence in the legal profession itself, as the public rightly

expects attorneys to honor their duty of loyalty and confidentiality even after representation ends.

4.3 To permit attorneys to pivot from defending a client to attacking it in the same regulatory forum –or any other– would foster distrust in the legal profession, weaken the foundational principle that clients can speak candidly with counsel, and ultimately erode the rule of law.

**WHEREFORE**, PREPA respectfully requests that the Energy Bureau take **NOTICE** of the foregoing and **DISQUALIFY** Maraliz Vázquez-Marrero and Giuliano Vilanova-Feliberti as counsels of Genera PR, LLC.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico this 10<sup>th</sup> day of September 2025.

**CERTIFICATE OF SERVICE:** We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and notified via e-mail to the Hearing Examiner, Scott Hempling, [shempling@scotthemplinglaw.com](mailto:shempling@scotthemplinglaw.com); and to the attorneys of the parties of record, attorneys of the intervenors of record, and other: *Puerto Rico Electric Power Authority*, through: Mirelis Valle-Cancel, [mvalle@gmlex.net](mailto:mvalle@gmlex.net); Juan González, [jgonzalez@gmlex.net](mailto:jgonzalez@gmlex.net); Alexis G. Rivera Medina, [arivera@gmlex.net](mailto:arivera@gmlex.net); Juan Martínez, [jmartinez@gmlex.net](mailto:jmartinez@gmlex.net); and Natalia Zayas Godoy, [nzayas@gmlex.net](mailto:nzayas@gmlex.net); and to Genera PR, LLC, through: Jorge Fernández-Reboredo, [jfr@sbgblaw.com](mailto:jfr@sbgblaw.com); Gabriela Castrodad, [gcastrodad@sbgblaw.com](mailto:gcastrodad@sbgblaw.com); José J. Díaz Alonso, [jdiaz@sbgblaw.com](mailto:jdiaz@sbgblaw.com); Stephen Romero Valle, [sromero@sbgblaw.com](mailto:sromero@sbgblaw.com); Giuliano Vilanova-Feliberti, [gvilanova@vvlawpr.com](mailto:gvilanova@vvlawpr.com); Maraliz Vázquez-Marrero, [mvazquez@vvlawpr.com](mailto:mvazquez@vvlawpr.com); [ratecase@genera-pr.com](mailto:ratecase@genera-pr.com); [regulatory@genera-pr.com](mailto:regulatory@genera-pr.com); and [legal@genera-pr.com](mailto:legal@genera-pr.com); Co-counsel for *Oficina Independiente de Protección al Consumidor*, [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov); [contratistas@jrsp.pr.gov](mailto:contratistas@jrsp.pr.gov); [p vazquez.oipc@avlawpr.com](mailto:p vazquez.oipc@avlawpr.com); Co-counsel for *Instituto de Competitividad y Sustentabilidad Económica*, [jpouroman@outlook.com](mailto:jpouroman@outlook.com); [agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com); Co-counsel for *National Public Finance Guarantee Corporation*, [epo@amgprlaw.com](mailto:epo@amgprlaw.com); [loliver@amgprlaw.com](mailto:loliver@amgprlaw.com); [acasellas@amgprlaw.com](mailto:acasellas@amgprlaw.com); [matt.barr@weil.com](mailto:matt.barr@weil.com); [robert.berezin@weil.com](mailto:robert.berezin@weil.com); [Gabriel.morgan@weil.com](mailto:Gabriel.morgan@weil.com); [Corey.Brady@weil.com](mailto:Corey.Brady@weil.com); Co-counsel for *GoldenTree Asset Management LP*, [lramos@ramoscruzlegal.com](mailto:lramos@ramoscruzlegal.com);

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