

**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 SUBMIT SUBSTITUTE DIRECT TESTIMONY

TO THE HEARING EXAMINER,

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

1.1. On July 3, 2025, LUMA Energy LLC and LUMA Energy ServCo, LLC (jointly, "LUMA") filed a *Motion Submitting Rate Review Petition* whereby they submitted before the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") the 2025 Rate Review Petition, along with all supporting documentation, including PREPA's direct testimonies, exhibits, and other documents in support of its rate review request (collectively, the "Rate Application").

1.2. Among the documents included in the Rate Application is PREPA Exhibit 33, consisting of the Direct Testimony of PREPA's former Chief Financial Officer, Mr. Oscar X. Ocasio González.

1.3. After the Rate Application was filed, Mr. Ocasio González ceased working at PREPA. Accordingly, he will not appear or testify at the evidentiary hearing in this proceeding.

1.4. PREPA has designated its current Comptroller, Mr. Juan Carlos Adrover Ramírez, to appear and testify at the evidentiary hearing in substitution of Mr. Ocasio González.

1.5. As authorized by the Hearing Examiner, Mr. Scott Hempling, PREPA hereby submits as **Annex A** the Direct Testimony of Mr. Adrover Ramírez, which shall substitute Mr. Ocasio González's Direct Testimony as PREPA Exhibit 33 for the permanent rate phase of this proceeding.¹ Mr. Adrover Ramírez sponsors and adopts all of PREPA's previously submitted exhibits that had been sponsored by Mr. Ocasio González. Mr. Adrover Ramírez also sponsors and adopts PREPA Exhibit 45 – 07.17.25 PREPA Employee Retirement System, Forecast of Proposed Cash Transfers, July 31, 2025 through June 30, 2026, which was submitted as part of *PREPA's Responses to the Hearing Examiner's Request for Information in the Agenda for the July 11, 2025 Conference and to Supplement Rate Case Application*, filed on July 17, 2025, to supplement PREPA's request under the Rate Application.

1.6. In light of the foregoing, PREPA respectfully requests that the Hearing Examiner accept and deem filed the Direct Testimony of Mr. Juan Carlos Adrover Ramírez as the substitute testimony for PREPA Exhibit 33, and that the record be updated accordingly to reflect this substitution.

¹ On July 31, 2025, the Energy Bureau issued a *Resolution and Order* establishing both a provisional rate and budget for Fiscal Year 2026. PREPA's request for provisional rates was duly supported by the direct testimony of Mr. Oscar X. Ocasio González, then PREPA's Chief Financial Officer, and Eng. Mary C. Zapata, PREPA's Chief Executive Officer, who also submitted written testimony in support of PREPA's portion of the Rate Application. Since the provisional rate has already been approved, the direct testimony of Mr. Juan Carlos Adrover Ramírez focuses exclusively on PREPA's request for permanent rates. To the extent that the Energy Bureau and/or the Hearing Examiner deem that Mr. Ocasio González's testimony regarding the provisional rates should remain part of the record, PREPA respectfully requests that Mr. Ocasio González's direct testimony be re-labeled as PREPA Exhibit 33A and Mr. Adrover Ramírez's direct testimony be designated as PREPA Exhibit 33B. It is important to note that the exhibits submitted by PREPA in support of its request for a provisional rate to cover pension obligations are the same exhibits that support its request for a permanent rate to fund those obligations.

WHEREFORE, PREPA respectfully requests that the Hearing Examiner accept and deem filed the Direct Testimony of Mr. Juan Carlos Adrover Ramírez (Annex A of this motion) as the substitute testimony for PREPA Exhibit 33, and that the record be updated accordingly to reflect this substitution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 24th 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; and to the attorneys of the parties of record, attorneys of the intervenors of record, and other: katuska.bolanos-lugo@us.dlapiper.com; Yahaira.delarosa@us.dlapiper.com; margarita.mercado@us.dlapiper.com; carolyn.clarkin@us.dlapiper.com; andrea.chambers@us.dlapiper.com; regulatory@genera-pr.com; legal@genera-pr.com; mvazquez@vvlawpr.com; gvilanova@vvlawpr.com; ratecase@genera-pr.com; jfr@sbgblaw.com; hrivera@jrsp.pr.gov; gerardo.cosme@solartekpr.net; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com; Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidhouse.com; Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; alexis.ramsey@weil.com; kara.smith@weil.com; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; lgnq2021@gmail.com; jan.albinolopez@us.dlapiper.com; Rachel.Albanese@us.dlapiper.com; varoon.sachdev@whitecase.com; javrua@sesapr.org; Brett.ingerman@us.dlapiper.com; brett.solberg@us.dlapiper.com; agraitfe@agraitlawpr.com; jpouroman@outlook.com; epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; Robert.berezin@weil.com; Gabriel.morgan@weil.com; corey.brady@weil.com; lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; isaac.glassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; hburgos@cabprlaw.com; dperez@cabprlaw.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; zack.schrieber@cwt.com; thomas.curtin@cwt.com; escalera@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; David.herman@dechert.com; Isaac.Stevens@dechert.com; James.Moser@dechert.com;

michael.doluisio@dechert.com;
Julia@londoneconomics.com;
luke@londoneconomics.com;
mmcgill@gibsondunn.com; LShelfer@gibsondunn.com; icasillas@cstlawpr.com;
jnieves@cstlawpr.com; pedrojimenez@paulhastings.com;
ericstolze@paulhastings.com; arrivera@nuenergypr.com; apc@mcvpr.com;
ramonluisnieves@rlnlegal.com;rsmithla@aol.com; guy@maxetaenergy.com;
jorge@maxetaenergy.com; rafael@maxetaenergy.com;
dawn.bisdorf@gmail.com; msdady@gmail.com; mcranston29@gmail.com;
ahopkins@synapse-energy.com; clane@synapse-energy.com;
kbailey@acciongroup.com; zachary.ming@ethree.com;
PREBconsultants@acciongroup.com; carl.pechman@keylogic.com;
bernard.neenan@keylogic.com; tara.hamilton@ethree.com;
aryeh.goldparker@ethree.com; roger@maxetaenergy.com;
Shadi@acciongroup.com; MWhited@synapse-energy.com;
Gerard.Gil@ankura.com; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com;
mdiconza@omm.com; golivera@omm.com; pfriedman@omm.com;
msyassin@omm.com; msyassin@omm.com.

GONZÁLEZ & MARTÍNEZ

1509 López Landrón, Bldg.
Seventh Floor
San Juan, PR 00911-1933
Tel.: (787) 274-7404

s/ Mirelis Valle Cancel

RUA No.: 21115
Email: mvalle@gmlex.net