

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

NEPR
Received:
Oct 23, 2025
6:34 PM

IN RE:

PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: Joint Motion to Correct October 21st
Joint Motion on Solar Issues**

**JOINT MOTION TO CORRECT OCTOBER 21ST JOINT MOTION ON SOLAR ISSUES
TO THE HONORABLE PURERTO RICO ENERGY BUREAU AND ITS HEARING
EXAMINER:**

COME NOW, Solar and Energy Storage Association of Puerto Rico (“SESA”), Solar United Neighbors (“SUN”), LUMA Energy, LLC (“ManagementCo”), and LUMA Energy ServCo, LLC (“ServCo;” collectively with ManagementCo, “LUMA”) (SESA, SUN, and LUMA, hereafter and jointly, the “Parties”) respectfully move to modify the expert testimonies and request as follows:

1. On October 21, 2025, the Parties filed a *Joint Motion on Agreements to Revise Testimonies on Solar Issues* (“October 21st Joint Motion”). Therein, the Parties informed the Energy Bureau of the outcome of discussions held with the aim of reaching agreements on modifications to respective testimonies regarding solar issues.

2. The Parties respectfully submit this corrective filing to address a clerical error identified in the October 21st Joint Motion.

3. Specifically, paragraph 7(c) of the October 21st Joint Motion, which concerns modifications to the direct testimony of SESA witness E. Kyle Datta, inadvertently included the phrase “line 14 through line 27.” To avoid any ambiguity as to the scope of the agreed withdrawal, the Parties request that paragraph 7(c) be corrected to read as follows:

- “Withdraw page 8, line 14 through ‘ratepayers’, as well as the associated footnote.”

4. In light of the above, the Parties jointly and respectfully request that the Energy Bureau accept this correction *nunc pro tunc* to the date of the original filing, deem paragraph 7(c) of the October 21st Joint Motion amended as set forth above, and confirm that no other changes to the October 21st Joint Motion are intended or effected by this filing. The Parties further note that the redlined testimonies to be submitted are, and will remain, consistent with this correction. Granting this limited corrective relief will ensure the record accurately reflects the Parties’ agreements to revise testimonies on solar issues.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23rd day of October, 2025.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Notice will be notified to Hearing Examiner, Scott Hempling, shempling@scotthemplinglaw.com; and to the attorneys of the parties of record. To wit, to the **Puerto Rico Electric Power Authority**, through: Mirelis Valle-Cancel, mvalle@gmlex.net; Juan González, jgonzalez@gmlex.net; Alexis G. Rivera Medina, arivera@gmlex.net; Juan Martínez, jmartinez@gmlex.net; and Natalia Zayas Godoy, nzayas@gmlex.net; and to **Genera PR, LLC**, through: Jorge Fernández-Reboredo, jfr@sbgbllaw.com; Giuliano Vilanova-Feliberti, gvilanova@vvlawpr.com; Maraliz Vázquez-Marrero, mvazquez@vvlawpr.com; ratecase@genera-pr.com; regulatory@genera-pr.com; and legal@genera-pr.com; **Co-counsel for Oficina Independiente de Protección al Consumidor**, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; **Co-counsel for Instituto de Competitividad y Sustentabilidad Económica**, jpouroman@outlook.com; agraitfe@agraitlawpr.com; **Co-counsel for National Public Finance Guarantee Corporation**, 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; alexis.ramsey@weil.com; **Co-counsel for GoldenTree Asset Management LP**, lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; iglassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; **Co-counsel for Assured Guaranty, Inc.**, hburgos@cabprlaw.com; dperez@cabprlaw.com; mmcgill@gibsondunn.com; lshelfer@gibsondunn.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; **Co-counsel for Syncora Guarantee, Inc.**, escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com;

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