

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

NEPR

Received:

Oct 27, 2025

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IN RE: REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

CASE NO.: NEPR-AP-2023-0004

SUBJECT: Request for Extension to Submit
Memorandum of Law in Support of
Confidential Treatment of Exhibits 1 and 2
Filed on October 17, 2025

**REQUEST FOR EXTENSION TO SUBMIT MEMORANDUM OF LAW IN SUPPORT
OF CONFIDENTIAL TREATMENT OF EXHIBITS 1 AND 2 FILED ON OCTOBER 17,
2025**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC (“ManagementCo”), and **LUMA Energy ServCo, LLC** (“ServCo”), (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On October 17, 2025, LUMA Filed a *Motion Submitting 2025 IRP and Request for Confidential Treatment* (“October 17th Motion”) in which it submitted to the Energy Bureau the 2025 Integrated Resource Plan (“IRP”), marked as Exhibit 1, and the workpapers and models relied upon in the development of the 2025 IRP, marked as Exhibit 2 (the “October 17th Exhibits”). The 2025 IRP on October 17th consisted of Exhibit 1, a document of approximately 666 pages, and Exhibit 2, various Excel spreadsheets and documents.

2. In the October 17th Motion, LUMA requested that certain portions of the October 17th Exhibits be designated as confidential material protected from disclosure, as containing trade secrets, *see, e.g.*, Act 80-2011, PR Laws Ann. Tit. 10, §§ 4131-4144 (2023), as well as Critical Energy Infrastructure Information (“CEII”), *see e.g.*, 6 U.S.C. §§ 671-674; 18 C.F.R. § 388.113 (2020), and pursuant to the Energy Bureau’s Policy on Management of Confidential Information,

CEPR-MI-2016-0009 issued on August 31, 2016, as amended by the Resolution dated September 16, 2016. LUMA also informed that, pursuant to Section A.2 of the Energy Bureau's Policy on Management of Confidential Information, LUMA would be submitting a Memorandum of Law in support of this request within the next ten (10) days.

3. LUMA respectfully informs that LUMA's counsel is in the process of preparing the mentioned Memorandum of Law. LUMA notes that the size (in terms of pages) of the October 17th Exhibits is substantial, and that these documents contain complex, technical information that requires careful, thorough analysis to ensure accuracy and completeness in the evaluation of the confidential portions and the legal basis thereof. This accurate and thorough assessment is needed, given the heightened importance of protecting CEII and Trade Secret information. Therefore, and despite counsel's best efforts, additional time is needed to complete the Memorandum of Law in support of the confidential treatment of the relevant portions of these exhibits. Accordingly, LUMA respectfully requests an extension of two (2) days to complete this effort. Considering the brevity of this extension, it is respectfully submitted that it should not cause undue delay and, on the contrary, will promote a more accurate and complete record.

WHEREFORE, LUMA respectfully requests the Energy Bureau to **take notice** of the foregoing and **grant** an extension of two (2) days to file the Memorandum of Law in support of the request for confidential treatment of Exhibits 1 and 2 to the *Motion Submitting 2025 IRP and Request for Confidential Treatment* filed on October 17, 2025.

WE HEREBY CERTIFY that this Motion was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Motion will be notified to the Puerto Rico Electric Power Authority: lionel.santa@prepa.pr.gov and through its attorneys of record Mirelis

Valle-Cancel, mvalle@gmlex.net; and Alexis G. Rivera Medina, arivera@gmlex.net; and Genera PR, LLC, through its attorney of record Luis R. Román Negrón, lrn@roman-negrom.com.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on October 27th, 2025.



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