

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

NEPR

Received:

Oct 31, 2025

6:14 PM

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

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: LUMA's Omnibus Request
for Extension of Deadlines
(Surrebuttals, Object to Exhibits
Marked for ID, Comment on Panel
Agenda and adding Witnesses for
Emergency Response Panel)**

OMNIBUS REQUEST FOR EXTENSION OF DEADLINES

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU, AND ITS HEARING
EXAMINER, SCOTT HEMPLING:**

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly,
“LUMA”), and respectfully requests short extensions of the following deadlines:

Task	Current Due Date	Requested Extended Due Date
File rebuttal/sur-rebuttals to Guímel-Cortés Report and Hurley Rebuttal.	November 3, 2025	November 10, 2025
Identify the witnesses who will participate in the Emergency Reserve Account and Emergency Response Plan panel.	November 3, 2025	November 5, 2025
Submit comments on proposed panels.	November 3, 2025	November 5, 2025
File objections to Exhibits marked for ID by October 27	October 31, 2025	November 3, 2025

1. On October 10, 2025, the Puerto Rico Energy Bureau (“Energy Bureau”) notified the parties of the Expert Report of Guímel Cortés, PC Exhibit 65.0, on the Matter of Federal Funding (“Guímel-Cortés Report”). That same day, the Hearing Examiner entered an order titled “Hearing

Examiner's Order Submitting Expert Report of Energy Bureau Consultants" ("October 10 Order"), formally designating the Guímel-Cortés Report as PREB Consultants Exhibit 65.

2. The Guímel-Cortés Report discusses federal disaster recovery funding, the reimbursement processes, liquidity gaps and submits a proposal to create a Restricted Federally Funded Capital Account to bridge cash-flow gaps and safeguard customers from unwarranted rate increases.

3. On October 27, 2025, the Rebuttal Testimony of Anthony Hurley, submitted on behalf of National Public Finance Guarantee Corporation, GoldenTree Asset Management LP, Syncora Guarantee, Inc., Assured Guaranty Inc., and the PREPA Ad Hoc Group, was filed with the Energy Bureau ("Hurley Rebuttal"). Among other matters, the Hurley Rebuttal specifically addresses and responds to the findings and recommendations of the Guímel-Cortés Report.

4. Pursuant to the Hearing Examiner's Order on Various Prehearing Matters, dated October 29, 2025 ("October 29 Order"), Applicants' surrebuttals on debt, rate design, and decoupling were due on October 30, 2025, and Applicants' remaining surrebuttals, except those related to generation, are due on November 3, 2025. Accordingly, LUMA's surrebuttal in response to the Guímel-Cortés Report is due on November 3, 2025.

5. After careful review of the Guímel-Cortés Report, and in particular the novel proposals it introduces, LUMA respectfully submits that additional time is required to thoroughly evaluate the report, determine whether surrebuttal is warranted, and, if so, to prepare and submit such surrebuttal. This evaluation must also take into account the Hurley Rebuttal, which was filed only five days ago. LUMA therefore respectfully requests that the Energy Bureau grant an extension until November 10, 2025, which will allow sufficient time to complete a thorough evaluation of both the Guímel-Cortés Report and the Hurley Rebuttal, and, if warranted, to prepare and submit an informed surrebuttal.

6. The October 29 Order further included a draft panel agenda and expanded the scope of the Emergency Reserve Account Panel to address the Emergency Response Plan. Parties were directed to comment on the draft panel agenda and submit the names of the persons that will be added to the roster to address the Emergency Response Plan topic by November 3, 2025, at 5:00 p.m. AST.

7. LUMA requires additional time to submit its comments on the agenda and to identify the witnesses who will participate in the Emergency Reserve Account and Emergency Response Plan panel. LUMA respectfully requests an extension until November 5, 2025, to submit its comments on the proposed panel agendas and to notify the parties of the individuals who will be added to the panel now addressing the Emergency Response Plan.

8. LUMA also respectfully requests an extension of the deadline to file objections to Exhibits marked for identification by October 27, which, per the October 29 Order, are currently due October 31, 2025, until November 3, 2025. The reasons supporting this request are the same as those set forth above: the volume of recent filings, the need to coordinate among multiple teams, and to ensure a thorough and accurate review of the exhibits at issue.

9. LUMA respectfully submits that the extensions requested herein are necessary and justified. Since July 3, 2025, LUMA has responded to over five hundred requests for information, prepared more than thirteen surrebuttal testimonies due between October 30 and November 3, evaluated potential exhibits and objections to other parties' documents, and prepared for cross-examination and redirect testimony, all while maintaining good faith and without intent to delay these proceedings. To LUMA's understanding, the requested extensions will not prejudice any party or disrupt the orderly conduct of this proceeding.

WHEREFORE, LUMA respectfully requests that the Energy Bureau and its Hearing Examiner take notice of the foregoing procedural history and the issues raised by the Guímel-

Cortés Report and related filings; grant an extension until **November 10, 2025**, for LUMA to determine whether a surrebuttal to the Guímel-Cortés Report is warranted and, if so, to prepare and submit such surrebuttal; and extend the deadline until **November 5, 2025**, for LUMA to submit comments on the draft panel agendas and to notify the parties of the individuals who will be added to the panel addressing the Emergency Response Plan topics, as directed in the October 29 Order; and extend the deadline until **November 3, 2025**, for LUMA to file objections to Exhibits marked for identification by October 27, 2025.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st 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@sbgblaw.com; Giuliano Vilanova-Feliberti, gvilanova@vvlawpr.com; Maraliz Vázquez-Marrero, m vazquez@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; erickay@quinnemanuel.com; ***Co-Counsel for the PREPA Ad Hoc Group***, dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; david.herman@dechert.com;

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