

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

NEPR

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IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: Request for Confidential
Treatment of Portions of LUMA's
Response to Requests of Information PC-
of-LUMA-ACCTPAY-5.2, PC-of-LUMA-
TRS-20 and PC-of-LUMA-ACCTPAY-31**

**REQUEST FOR CONFIDENTIAL TREATMENT OF PORTIONS
OF RESPONSES TO REQUESTS OF INFORMATION
PC-OF-LUMA-ACCTPAY-5.2, PC-OF-LUMA-TRS-20,
AND PC-OF-LUMA-ACCTPAY-31**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

I. Introduction

LUMA respectfully submits this Motion requesting that the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") determine that certain portions of LUMA's responses to discovery requests PC-of-LUMA-ACCTPAY-5.2, PC-of-LUMA-TRS-20, and PC-of-LUMA-ACCTPAY-31 contain Critical Energy Infrastructure Information ("CEII"), trade secret and personal information protected by the right to privacy that must be protected from public disclosure. As set forth below, applicable legal authority compels the relief requested herein.

II. Procedural Background

On June 30, 2024, this Honorable Energy Bureau issued a Resolution and Order “to initiate [this] adjudicative process to review PREPA’s rates” (the “June 30th Order”) and opened this instant proceeding. *See* June 30th Order, p. 2.

Following a series of informal procedural events – including technical conferences and requests for information – aimed at receiving participants’ respective insights and concerns with regards to the upcoming rate review petition, on February 12, 2025, this Energy Bureau issued a Resolution and Order (“February 12th Order”), whereby it established “the filing requirements and procedures for the rate review of the [PREPA].” *See* February 12th Order, p. 1.

In what is pertinent to the present memorandum, the February 12th Order established confidentiality “procedures to balance the public’s right to access information about utility rates with the legitimate need to protect certain sensitive business information.” *See* February 12th Order, p. 10. These mandate that, if in compliance with the February 12th Order, “a person has the duty to disclose to the Energy Bureau information that the person considers privileged under the Rules of Evidence, the person shall identify the information, request the Energy Bureau to protect the information, and provide written arguments to support its claim for protection,” all as required by the Energy Bureau’s Policy on Management of Confidential Information, CEPR-MI-2016-0009, issued on August 31, 2016, as amended on September 21, 2016 (“Policy on Confidential Information”).

Furthermore, the February 12th Order states that the Energy Bureau will decide each confidentiality claim expeditiously and will proceed, in accordance with Article 6.15 of Act No. 57-2014, PR Laws Ann. Tit. 22 § 1054n (2025), 22 LPRA § 1054n (2025), if it deems that the protected material merits protection. *See* February 12th Order, p. 10. In its decision, “the Energy

Bureau will state (i) which information and documents are confidential or privileged; and (ii) the rules that shall be observed to duly safeguard the information.” *Id.* On the other hand, the February 12th Order provides the following:

If the Energy Bureau denies a confidentiality claim, the Energy Bureau will also state the period after which the document or information will be available to the public. Such period will give the submitter sufficient time to seek reconsideration or any other legal recourse to prevent disclosure if PREPA disagrees with the Energy Bureau’s decision.

Id.

More recently, on August 19, 2025, the Hearing Examiner, Mr. Scott Hempling, issued an *Order on Confidentiality Matters* (“August 19th Order”), with the aim of clarifying the terminology and treatment of confidential documents filed during discovery, in a manner consistent with the Energy Bureau’s Policy on Confidential Information. Specifically, per the August 19th Order, information filed as CEII will be available to participants who have a signed Non-Disclosure Agreement. On the other hand, information filed as a confidential trade secret will only be available to the Energy Bureau and its consultants.

As is widely known, on July 3, 2025, LUMA filed its *Motion Submitting Rate Review Petition* (“Rate Review Petition”) with this Honorable Puerto Rico Energy Bureau (“Energy Bureau”), pursuant to the filing requirements outlined by the Energy Bureau, as modified by the Hearing Examiner.

The filing of LUMA’s Rate Review Petition paved the way for the initiation of a discovery process in the captioned proceeding through which LUMA has received numerous requests for information from participants, intervenors, and consultants for the Energy Bureau.

In what is here pertinent, on October 22, 2025, LUMA submitted a response to a second follow-up request for information (“ROI”) identified as PC-of-LUMA-ACCTPAY-5 (follow-up

ROI to be referred to as “PC-of-LUMA-ACCTPAY-5.2”). The response to PC-of-LUMA-ACCTPAY-5.2 included four redacted attachments: PC-of-LUMA-ACCTPAY-5.2_Attachment 1, PC-of-LUMA-ACCTPAY-5.2_Attachment 2, PC-of-LUMA-ACCTPAY-5.2_Attachment 3, and PC-of-LUMA-ACCTPAY-5.2_Attachment 5. Portions of these attachments contain LUMA employee names; contractor employee names, signatures, emails and phone numbers; ABA routing numbers; bank account numbers and EINs.

Furthermore, on October 27, 2025, LUMA submitted a response to a ROI identified as PC-of-LUMA-TRS-20. The response to PC-of-LUMA-TRS-20 included four redacted attachments: PC-of-LUMA-TRS-20_Attachment 1, PC-of-LUMA-TRS-20_Attachment 2, PC-of-LUMA-TRS-20_Attachment 3, PC-of-LUMA-TRS-20_Attachment 4. Portions of these attachments contain CEII information such as line IDs, pole/structure/span FIDs, barcode scans of vegetation-related work tickets, GPS coordinates, Geographic Information System (GIS) data extracts related to T&D assets identification markers and LUMA Circuit and post-assessment maps. Portions of PC-of-LUMA-TRS-20_Attachment 1 also include the names of vendor/contractor employees.

On that same day, LUMA also submitted a response to an ROI identified as PC-of-LUMA-ACCTPAY-31. The response to PC-of-LUMA-ACCTPAY-31 included two redacted attachments: PC-of-LUMA-ACCTPAY-31_Attachment 1 and PC-of-LUMA-ACCTPAY-31_Attachment 2. Portions of these attachments contain trade secret/commercially sensitive information, as they contain the hourly rate, fringe benefit rate and total hourly rate for different job positions that LUMA intends to acquire for federally funded work.

In accordance with the Energy Bureau’s Policy on Confidential Information, LUMA submitted both an "unredacted" (confidential) version and a "redacted" (public) version of the

attachments mentioned above. These actions have been taken to protect the information considered confidential.

Furthermore, LUMA is submitting a memorandum of law that outlines and explains the legal basis for the confidential treatment of the attachments to PC-of-LUMA-ACCTPAY-5.2, PC-of-LUMA-TRS-20, and PC-of-LUMA-ACCTPAY-31.

III. Applicable Laws and Regulations for submitting information confidentially before the Energy Bureau

Section 6.15 of Act 57-2014 regulates the management of confidential information filed before this Energy Bureau. It provides, in pertinent part, that: “[i]f any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the Commission to treat such information as such” 22 LPRA § 1054n (2025). If the Energy Bureau determines, after appropriate evaluation, that the information should be protected, “it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.*, Section 6.15(a).

In connection with the duties of electric power service companies, Section 1.10(i) of Act 17-2019 further provides that electric power service companies shall submit information requested by customers, except for: (i) confidential information in accordance with the Rules of Evidence of Puerto Rico. 22 LPRA § 1141i (2025).

Access to the confidential information shall be provided “only to the lawyers and external consultants involved in the administrative process after the execution of a confidentiality agreement.” Section 6.15(b) of Act 57-2014, 22 LPRA § 1054n (2025). Finally, Act 57-2014

provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who needs to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct that a non-confidential copy be furnished for public review”. *Id.*, Section 6.15(c).

Moreover, the Energy Bureau’s Policy on Confidential Information details the procedures that a party should follow to request that a document or portion thereof be afforded confidential treatment. In essence, the Energy Bureau’s Policy on Confidential Information requires identification of the confidential information and the filing of a memorandum of law, “no later than ten (10) days after filing of the Confidential Information”, explaining the legal basis and support for a request to file information confidentially. *See* Policy on Confidential Information, Section A, as amended by the Resolution of September 16, 2016, CEPR-MI-2016-0009. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation and a summary of the reasons why each claim or designation conforms to the applicable legal basis of confidentiality. *Id.*, paragraph 3. The party who seeks confidential treatment of information filed with the Energy Bureau must also file both “redacted” or “public version” and an “unredacted” or “confidential” version of the document that contains confidential information. *Id.*, paragraph 6.

The Energy Bureau’s Policy on Confidential Information also states the following with regard to access to Trade Secret Information and CEII once determined Validated Confidential Information:

1. Trade Secret Information

Any document designated by the [Energy Bureau] as Validated Confidential Information on the grounds that it is a trade secret pursuant to Act 80-2011 may

only be accessed by the Producing Party and the [Energy Bureau], unless otherwise set forth by the [Energy Bureau] or any competent court.

2. Critical Energy Infrastructure Information (“CEII”)

The information designated by the [Energy Bureau] as Validated Confidential Information on the ground of being CEII may be accessed by the parties’ authorized representatives only after they have executed and delivered the Non-Disclosure Agreement.

Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the [Energy Bureau] or the Producing Party’s offices. During the review, the authorized representatives may not copy or disseminate the reviewed information and may bring no recording device to the viewing room.

Id., Section D (on Access to Validated Confidential Information).

Relatedly, Energy Bureau Regulation No. 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation Proceedings*, includes a provision for filing confidential information in adjudicatory proceedings before this honorable Energy Bureau. To wit, Section 1.15 provides that, “a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition and, if it understands [that] the material merits protection, proceed accordingly to . . . Article 6.15 of Act No. 57-2015, as amended.”

IV. Legal Basis and Arguments in Support of Confidentiality

1. CEII

Act 40-2024, better known as the *Commonwealth of Puerto Rico Cybersecurity Act*, defines “Critical Infrastructure” as those “services, systems, resources, and essential assets, whether physical or virtual, the incapacity or destruction of which would have a debilitating impact on Puerto Rico’s

cybersecurity, health, economy, or any combination thereof.” 3 LPRA § 10124(p) (2024). Generally, CEII or critical infrastructure information is exempt from public disclosure because it involves assets and information that pose public security, economic, health, and safety risks. Federal Regulations on CEII, particularly, 18 C.F.R. § 388.113, state that:

Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;
- (ii) Could be useful to a person in planning an attack on critical infrastructure;
- (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and
- (iv) Does not simply give the general location of the critical infrastructure.

Id.

Additionally, “[c]ritical electric infrastructure means a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of such matters.”

Id. Finally, “[c]ritical infrastructure means existing and proposed systems and assets, whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.” *Id.*

The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2020), part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”). CII is defined as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems....” 6 U.S.C. § 671 (3).

Portions of PC-of-LUMA-TRS-20_Attachment_1, PC-of-LUMA-TRS-20_Attachment_2, PC-of-LUMA-TRS-20_Attachment_3, and PC-of-LUMA-TRS-20_Attachment_4, as identified in

Section V of this Motion, contain CEII, as they contain T&D assets identification markers, GPS coordinates to energy infrastructure, and LUMA's circuit maps, all of which amount to CEII. T&D asset identification markers, GPS coordinates and circuit maps provide a level of detail that could potentially be helpful to a person planning an attack on energy infrastructure facilities interconnected with or served by this equipment. The information identified as confidential in this paragraph is not common knowledge, is not made publicly available, and if disclosed to the public, will expose key assets to security vulnerabilities or attacks by people seeking to cause harm to the systems. Therefore, it is in the public interest to keep the information confidential. Confidential designation is a reasonable and necessary measure to protect critical infrastructure from attacks and to enable LUMA to leverage information without external threats, *see e.g.*, 6 U.S.C §§ 671-674; 18 C.F.R. §388.113 (2020), and the Energy Bureau's Policy on Confidential Information.

2. Commercially Sensitive Confidential Information

The Puerto Rico legal system recognizes and protects the confidentiality of certain information considered to be privileged. In part, privileged materials are exclusively referred to as the privileges codified in the Rules of Evidence. *E.L.A v. Casta*, 162 DPR 1, 10 (2004). One of these recognized privileges is a company's Trade Secrets:

The owner of a trade secret has a privilege, which may be claimed by such person or by his or her agent or employee, to refuse to disclose and to prevent another from disclosing it, if the allowance of the privilege will not tend to conceal fraud or otherwise work injustice. If disclosure is directed, the court shall take such protective measures as the interest of the owner of a trade secret and of the parties and the interests of justice require.

See R. Evid. 513, 32 LPRA Ap. IV, R. 513 (2024).

In essence, this privilege “protects confidential commercial information” and is “based on public policy considerations aimed at promoting innovation, commercial production and business

operation improvement, which in turn contributes to economic and technological development”. (translation provided). *Colón Rivera v. Triple-S Salud, Inc.*, 2020 WL 8458051, page. *7 (Puerto Rico Court of Appeals, December 22, 2020).

Under the *Industrial and Trade Secret Protection Act of Puerto Rico*, Act 80-2011, 10 LPRA §§ 4131-4144, industrial or trade secrets are deemed to be any information:

- (a) That has a present or a potential independent financial value or ***that provides a business advantage***, insofar as such information is not common knowledge or readily accessible through proper means by persons who could make a monetary profit from the use or disclosure of such information, and
- (b) for which reasonable security measures have been taken, as circumstances dictate, to maintain its confidentiality.

Id. § 4132, Section 3 of Act 80-2011. (Emphasis added).

Trade secrets include, but are not limited to, processes, methods, and mechanisms, manufacturing processes, formulas, projects, or patterns to develop machinery, and lists of specialized clients that may afford an advantage to a competitor. *See* Statement of Motives, Act 80-2011. As explained in the Statement of Motives of Act 80-2011, protected trade secrets include any information bearing commercial or industrial value that the owner reasonably protects from disclosure. *Id. see also* Section 4(x) of the *Puerto Rico Open Government Data Act*, Act 122-2019, 3 LPRA § 9894 (exempting the following from public disclosure: (1) commercial or financial information whose disclosure will cause competitive harm).

The Puerto Rico Supreme Court has explained that the trade secrets privilege protects free enterprise and extends to commercial information that is confidential in nature. *Ponce Adv. Med v. Santiago González*, 197 DPR 891, 901-02 (2017); *see also Next Step Medical Co. v. MCS Advantage Inc.*, KLCE201601116, 2016 WL 6520173 (P.R. Court of Appeals, September 13, 2016) (holding that in Puerto Rico, what constitutes trade secrets is evaluated applying a broad definition). A trade secret includes ***any and all information*** (i) from which a real or potential value

or economic advantage may be derived; (ii) that is not common knowledge or accessible through other means; and (iii) as to which reasonable security measures have been adopted to keep the information confidential. *Ponce Adv. Medical*, 197 DPR, at p. 906.

Pursuant to Act 80-2011 and the applicable legal standards governing the protection of trade secrets and proprietary information, LUMA respectfully requests confidential treatment of those portions of Attachment 1 and 2 to LUMA's Response to PC-of-LUMA-ACCTPAY-31 that identify the hourly rates for all roles planned for federally funded work. These hourly rates constitute trade secrets within Section 3 of Act 80-2011, as they provide a business advantage by virtue of not being generally known or readily accessible to competitors or the public. Moreover, reasonable measures have been taken to maintain the confidentiality of this information, consistent with statutory requirements.

In addition to undermining public policy favoring the protection of valuable confidential information, disclosure of these hourly rates would risk causing harm to LUMA by stifling the hiring process and potentially increasing costs of labor since competitors will have the benefit of seeing hourly rates per job position and adjusting their own rates to compete with LUMA. Accordingly, LUMA requests that the Energy Bureau grant confidential treatment to these portions of Attachment 1 and 2 of LUMA's response to PC-of-LUMA-ACCTPAY-31 to safeguard the integrity of trade secrets, ensure compliance with the statutory protections afforded under Puerto Rico law, and secure the orderly conduct of future hiring negotiations between LUMA and potential employees.

3. Rights to Privacy

Portions of PC-of-LUMA-ACCTPAY-5.2_Attachment_1, PC-of-LUMA-ACCTPAY-5.2_Attachment_2, PC-of-LUMA-ACCTPAY-5.2_Attachment_3, PC-of-LUMA-ACCTPAY-

5.2_Attachment_5, and PC-of-LUMA-TRS-20_Attachment_1, as identified in Section V of this Motion, include LUMA employees' names; contractor employee names, signatures, emails and phone numbers; ABA routing numbers; bank account numbers and EINs. LUMA respectfully requests this personal and sensitive information be maintained confidentially. The confidential treatment of this information is in the public interest and aligned with Puerto Rico's legal framework on privacy which protects from the disclosure of personal information. *See e.g.*, Const. ELA, Art. II, Sections 8 and 10, which protect the right to control personal information and distinctive traits, which applies *ex proprio vigore* and against private parties. *See also e.g. Vigoreaux v. Quiznos*, 173 DPR 254, 262 (2008); *Bonilla Medina v. P.N.P.*, 140 DPR 294, 310-11 (1996), *Pueblo v. Torres Albertorio*, 115 DPR 128, 133-34 (1984). *See also*, Article 4(vi) of the "Puerto Rico Open Government Data Act," Act No. 122-2019, 3 LPRA § 9894 (2025) (listing as an exception to the rule on public disclosure, "[i]nformation that, if disclosed, could constitute an invasion of privacy of a third party, or impair the fundamental rights of said third party").

In sum, it is respectfully submitted that the protection of all of the confidential information discussed above does not affect the public's or the Energy Bureau's review of the present filing nor interfere with processes before this Energy Bureau. Therefore, on balance, the public interest to protect CEII, trade secret information, and the right to privacy weighs in favor of protecting the relevant portions of LUMA's responses to PC-of-LUMA-ACCTPAY-5.2, PC-of-LUMA-TRS-20 and PC-of-LUMA-ACCTPAY-31 from disclosure.

V. Identification of Confidential Information within LUMA's Rate Review Petition

In compliance with the Energy Bureau's Policy on Confidential Information, CEPR-MI-2016-0009, a table summarizing the hallmarks of this request for confidential treatment is hereby included.

Document	Confidential Portions	Legal Basis for Confidentiality	Date Filed
PC-of-LUMA-ACCTPAY-5.2_Attachment_1	EIN Pages 4, 7, 10, 13	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	October 22, 2025
PC-of-LUMA-ACCTPAY-5.2_Attachment_2	LUMA employee name Pages 1, 4, 7, 10, 13, 16, 19 Contractor employee names Pages 1-21 Contractor phone numbers Pages 1-21 Contractor employee signatures Pages 1, 4, 7, 10, 13, 16, 19 Contractor emails Pages 2, 5, 8, 11, 14, 17, 20 ABA Routing Number Pages 2, 5, 8, 11, 14, 17, 20 Bank Account Number Pages 2, 5, 8, 11, 14, 17, 20	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	October 22, 2025
PC-of-LUMA-ACCTPAY-5.2_Attachment_3	EIN Page 17	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	October 22, 2025
PC-of-LUMA-ACCTPAY-5.2_Attachment_5	LUMA employee name Pages 1, 5, 8, 11, 14, 17, 20 Contractor employee names Pages 1-22	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	October 22, 2025
PC-of-LUMA-TRS-20_Attachment_1	Line IDs Pages 1-27	Critical Energy Infrastructure Information 18	October 27, 2025

Document	Confidential Portions	Legal Basis for Confidentiality	Date Filed
	Pole/Structure/Span FIDs Pages 2-27 Barcode scans of vegetation-related work tickets Pages 2-27 GPS coordinates Pages 4-7, 10, 13, 16, 18-27	C.F.R. § 388.113; 6 U.S.C. §§ 650, 671-674	
PC-of-LUMA-TRS-20_Attachment_1	Contractor employee names Pages 2-27	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	October 27, 2025
PC-of-LUMA-TRS-20_Attachment_2	LUMA Circuit Map from the Vegetation Ops Map Entire Page	Critical Energy Infrastructure Information 18 C.F.R. § 388.113; 6 U.S.C. §§ 650, 671-674	October 27, 2025
PC-of-LUMA-TRS-20_Attachment_3	GIS data extract “objectid” and “globalid” Columns A-B, Rows 2-214 “lat”, “long”, “survey_date”, and “unique_id” Columns L-O, Rows 2-214 “line_number” Column Q, Rows 2-214 “structure_fid”, “span_length”, “voltages_KV” Columns T-V, Rows 2-214	Critical Energy Infrastructure Information 18 C.F.R. § 388.113; 6 U.S.C. §§ 650, 671-674	October 27, 2025

Document	Confidential Portions	Legal Basis for Confidentiality	Date Filed
PC-of-LUMA-TRS-20_Attachment_4	LUMA post-work assessment map Entire Page	Critical Energy Infrastructure Information 18 C.F.R. § 388.113; 6 U.S.C. §§ 650, 671-674	October 27, 2025
PC-of-LUMA-ACCTPAY-31_Attachment 1	Table listing position title, rate and estimated labor costs of internal employees “Hourly Rate”, “Fringe Benefit Rate” and “Total Hourly Rate” 3 rd , 4 th and 5 th Columns of the table	Sensitive Commercial Information and Trade Secrets under Act 80-2011.	October 27, 2025
PC-of-LUMA-ACCTPAY-31_Attachment 2	Table listing position title, rate and estimated labor costs of contracted employees “Hourly Rate”, “Fringe Benefit Rate”, “Total Hourly Rate + Fringe”, “GSA Calc Avg. Rate/Hour Validation” Columns D-G, Rows 6-77 “Rate/Hr.” and “Cost Difference” Columns J-K, Rows 6-77 “Rate/Hr.” and “Cost Difference” Columns N-O, Rows 6-77 “Rate/Hr.”, “Cost Difference” and “Differential Ratio %” Columns R-T, Rows 6-77	Sensitive Commercial Information and Trade Secrets under Act 80-2011.	October 27, 2025

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **grant** LUMA's request to keep the above-identified portions of LUMA's responses to **PC-OF-LUMA-ACCTPAY-5.2, PC-OF-LUMA-TRS-20, and PC-OF-LUMA-ACCTPAY-31** under seal of confidentiality.

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, 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; 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; michael.doluisio@dechert.com; stuart.steinberg@dechert.com; *Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica*, nancy@emmanuelli.law; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; lgnq2021@gmail.com; *Official Committee of Unsecured Creditors of PREPA*, jcasillas@cstlawpr.com; jnieves@cstlawpr.com; *Solar and Energy Storage Association of Puerto Rico*, Cfl@mcvpr.com; apc@mcvpr.com; javrua@sesapr.org;

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