

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

NEPR

Received:

Nov 10, 2025

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IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: Extension of Time to file
Surrebuttal Testimony on Generation
Expert Report

**MOTION FOR EXTENSION OF TIME TO FILE SURREBUTTAL ON
GENERATION EXPERT REPORT**

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. On October 16th, 2025, the Hearing Examiner, Mr. Scott Hempling, issued an order titled *Hearing Examiner's Order Setting Agenda for Conference of October 16, 2025*. The Hearing Examiner ordered the parties to submit surrebuttals related to the Generation Expert Report of Justo González, PE ("Expert Report") by November 10, 2025.

2. PREPA informs that it is currently preparing its surrebuttal testimony to the Expert Report, which requires coordination among multiple internal technical departments and consultation with external advisors. The process also involves verifying PREPA's records, including FEMA-funded project documentation and system stabilization plans. These steps are essential to ensure a reliable, well-supported evidentiary response that will aid the Energy Bureau's analysis and preserve the integrity of the record.

3. Moreover, as PREPA prepares for the evidentiary hearings in this case, it

is simultaneously drafting responses to dozens of ROIs from various stakeholders and reviewing the numerous filings and orders issued daily. This substantial workload, combined with PREPA's limited personnel, has prevented the completion of the surrebuttal testimony within the current deadline. The need to interview and coordinate with multiple subject-matter experts and coordinate across several internal divisions has further made it impossible to finalize a the surrebuttal testimony within the allotted time.

4. It is worth noting that the surrebuttal testimony is essential to explain and develop the extent of Mr. González's opinion relating to PREPA's hydroelectric facilities. Specifically, the surrebuttal testimony will shed light on the detrimental effect Mr. González's opinion will have over federal funds (and potential future loss thereof), as well as indirect yet significant increases in expenses and mitigation costs that would ultimately burden rate payers.

5. Accordingly, PREPA respectfully requests a brief extension of time of three (3) days, until November 13, 2025, to ensure that its surrebuttal testimony is accurate and fully responsive to the issues raised in the Expert Report regarding hydroelectric assets. PREPA recognizes that time is of the essence in this proceeding and remains committed to moving the case forward without unnecessary delay. However, the brief extension requested is essential and will promote the orderly development of the evidentiary record in this rate revision proceeding.

WHEREFORE, PREPA respectfully requests an extension of time until Thursday, November 13, 2025, to submit its surrebuttal to the Expert Report.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 10th of November, 2025.

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CERTIFICATE OF SERVICE

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 others: katiuska.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; hriviera@jrsp.pr.gov; gerardo_cosme@solartekpr.net; contratistas@jrsp.pr.gov; victorluisgonzalez@yahoo.com; Cfl@mcvpr.com; nancy@emmanuelli.law; jrinconlopez@guidedhouse.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; Kayla.Yoon@dechert.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; juan@londoneconomics.com; mmcgill@gibsondunn.com; LShelfer@gibsondunn.com; jcasillas@cstlawpr.com; jnieves@cstlawpr.com; pedrojimenez@paulhastings.com; ericstolze@paulhastings.com; arrivera@nuenergypr.com; apc@mcvpr.com; ramonluisnieves@rlnlegal.com; kbailey@acciongroup.com .

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