

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

NEPR

Received:

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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 PREPA
Testimony and Legal Discussion on
Pensions

**MOTION FOR EXTENSION OF TIME TO FILE PREPA TESTIMONY AND LEGAL DISCUSSION
ON PENSIONS**

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 27th, 2025, the Hearing Examiner, Mr. Scott Hempling, issued an order titled *Hearing Examiner's Order Requiring PREPA Testimony and Legal Discussion on Pensions* ("October 27 Order"). The Hearing Examiner ordered PREPA, and invited other parties, to submit prefiled testimony and legal explanations on the pension-related questions attached to its October 27 Order. The deadline for those submissions is November 14, 2025, at 5:00 pm (AST).

2. PREPA informs that it is currently preparing its testimony and legal briefing, which requires internal PREPA coordination and consultation with the pension system and external advisors. The process also involves verifying information in PREPA's records or received from the pension system. 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, will prevent the completion of the testimony within the current deadline.

4. Accordingly, PREPA respectfully requests a brief extension of time of five (5) days, until November 19, 2025, to ensure that its testimony is accurate and fully responsive to the October 27 Order. 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, will promote the orderly development of the evidentiary record in this rate proceeding and will still allow the Energy Bureau sufficient time to review PREPA's submission in advance of the Pension panel, currently scheduled for December 10.

WHEREFORE, PREPA respectfully requests an extension of time until Wednesday, November 19, 2025, to comply with the October 27 Order.

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 12th 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@guidehouse.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; flauria@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; mmcgrill@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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