

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

NEPR

Received:

Dec 10, 2025

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IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW

CASE NO.: NEPR-AP-2023-0003

SUBJECT: Brief Extension of Time to
file LFEs related to PREPA Irrigation

MOTION FOR EXTENSION OF TIME TO COMPLY WITH THE DECEMBER 10TH ORDER
REQUIRING INFORMATION ON PREPA IRRIGATION

TO THE HEARING EXAMINER,

COMES NOW, the Puerto Rico Electric Power Authority, through its undersigned legal counsel and, very respectfully, states and prays as follows:

1. Today, December 10, 2025, the Hearing Examiner issued an Order ("December 10th Order") directing PREPA to provide information ("RFIs") related to irrigation matters and costs associated with negligence liability, with responses to the irrigation RFIs due by the end of business tomorrow, December 11, 2025. PREPA is required to respond to nine (9) RFIs under this December 10th Order.

2. Also today, PREPA received an email from Ms. Kate Bailey of the Accion Group providing procedural guidance regarding the placement of responses to the required information and instructing PREPA to file such responses as Late-Filed Exhibits ("LFEs").

3. PREPA informs that the personnel and resources necessary to compile the requested information are currently engaged in the ongoing above-

captioned rate review proceeding, including witnesses participating in the Pensions Panel that commenced today, December 10 and continue tomorrow, December 11. In addition, preparing the responses requires coordination with multiple PREPA departments, review of internal records, and consultation with external advisors. These steps are essential to ensure that PREPA submits accurate, verifiable, and well-supported information that will assist the Energy Bureau's analysis and preserve the integrity of the evidentiary record.

4. Further, PREPA notes that the substantial workload imposed by the ongoing evidentiary hearings, combined with PREPA's significantly limited staffing, renders the 24-hour deadline impracticable.

5. However, the brief extension requested is essential to allow PREPA to develop accurate and complete responses to ensure the Energy Bureau has a complete record limited to issues properly within the scope of this rate case.

6. Accordingly, PREPA respectfully requests a brief four-day extension, **until December 17, 2025**, to submit complete and accurate responses to the December 10th Order. PREPA understands the importance of adhering to the procedural schedule and remains committed to advancing this case without unnecessary delay. However, this short extension is necessary to ensure that the Energy Bureau receives a reliable and comprehensive evidentiary record limited to matters properly within the scope of this rate review proceeding.

WHEREFORE, PREPA respectfully requests an extension of time until December 17, 2025, to submit the required responses as LFEs in compliance with the December 10th Order.

RESPECTFULLY SUBMITTED.

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

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 other: LUMA Energy, LLC and LUMA Energy ServCo, LLC; Margarita Mercado margarita.mercado@us.dlapiper.com; Jan Albino, Jan.AlbinoLopez@us.dlapiper.com; Andrea Chambers, andrea.chambers@us.dlapiper.com; Carlyn Clarkin, carolyn.clarkin@us.dlapiper.com; Katiushka Bolanos, katiushka.bolanos-lugo@us.dlapiper.com; Yahaira De La Rosa, Yahaira.delarosa@us.dlapiper.com; Genera PR, LLC, through: Jorge Fernández-Reboredo, jfr@sbgbllaw.com; Gabriela Castrodad, gcastrudad@sbgbllaw.com; José J. Díaz Alonso, jdiaz@sbgbllaw.com; Stephen Romero Valle, sromero@sbgbllaw.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; Oficina Independiente de Protección al Consumidor, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; Instituto de Competitividad y Sustentabilidad Económica, jpouroman@outlook.com; agraitfe@agraitlawpr.com; 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; 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; 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; Syncora Guarantee, Inc., escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; 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

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