

**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
Responses to Requests of Information
NPFGC-of-LUMA-LOAD_FOR-23, PC-of-
LUMA-NONPHYS_OPS-97 and PC-OF-
LUMA-NONPHYS_OPS-106**

**REQUEST FOR CONFIDENTIAL TREATMENT OF PORTIONS OF RESPONSES TO
REQUESTS OF INFORMATION NPFGC-of-LUMA-LOAD_FOR-23, PC-of-LUMA-
NONPHYS_OPS-97 AND PC-OF-LUMA-NONPHYS_OPS-106**

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 Honorable Energy Bureau of the Puerto Rico Public Service Regulatory Board (“Energy Bureau”) determine that certain portions of LUMA’s responses to discovery requests NPFGC-of-LUMA-LOAD_FOR-23, PC-of-LUMA-NONPHYS_OPS-97 and PC-OF-LUMA-NONPHYS_OPS-106 contain: numerous and varied personal identifiers which must be protected from public disclosure, pursuant to the widely recognized right to privacy; trade secret information; and third-party proprietary information. As set forth below, applicable legal authority compels the relief requested herein.

II. Procedural Background

On June 30, 2024, this 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 various technical conferences and requests for information – aimed at receiving participants’ respective insights and concerns with regard 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 Puerto Rico Electric Power Authority (‘PREPA’).” *See* February 12th Order, p. 1.¹

In what is pertinent to the present request, 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”², 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. 57-2014³, 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

¹ Although not relevant to the present request, LUMA notes that the filing requirements issued by this Energy Bureau through its February 12th Order were later modified by way of various orders.

³ Known as the “Puerto Rico Energy Transformation and RELIEF Act” (hereinafter, “Act 57-2014”).

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.⁴

Id.

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.

In what is pertinent here, on November 18, 2025, LUMA submitted a response to a request for information (“ROI”) identified as NPFGC-of-LUMA-LOAD_FOR-23. The supporting files to the response, identified as *NPFGC-of-LUMA-LOAD_FOR-23-Attachment_4*, and *NPFGC-of-LUMA-LOAD_FOR-23-Attachment_5* involve documents designated as confidential as part of LUMA’s October 17, 2025 submittal of the Integrated Resource Plan, in Case No. NEPR-AP-2023-0004.⁵ Portions of these attachments contain third-party proprietary information, whose disclosure will cause competitive harm, and is therefore exempt from said public disclosure.

Furthermore, on November 25, 2025, LUMA submitted a response to a ROI identified as PC-of-LUMA-NONPHYS_OPS-97. The response to PC-of-LUMA-FIN-89 included two (2) redacted attachments: *PC-of-LUMA-NONPHYS_OPS-97_Attachment_1*, and *PC-of-LUMA-*

⁴ Lastly, the February 12th Order states that the “Energy Bureau’s staff having access to Confidential Information will follow the *Puerto Rico Energy Bureau’s Internal Guidelines for the Treatment of Confidential Information*.” See February 12th Order, p. 10.

⁵ See <https://energia.pr.gov/wp-content/uploads/sites/7/2025/10/20251017-AP20230004-Motion-IRP-and-Conf-Request-1-2.pdf>, and <https://energia.pr.gov/wp-content/uploads/sites/7/2025/10/20251029-AP20230004-Memo-of-Law-in-Supp-of-Req-of-Conf-Treatment-Rev-2025-IRP.pdf>, for related memorandum in support of request for confidentiality.

NONPHYS_OPS-97_Attachment 2. These two (2) attachments encompass contracts subscribed by LUMA and external counsel, Perkins Coie, for legal services provided to LUMA's Regulatory Department. Portions of these attachments contain protected personal identifiers of representatives of LUMA and Perkins Coie, as well as a supplemental service proposal protected from disclosure by trade secret law.

On that same day, November 25, 2025, LUMA submitted a response to a ROI identified as PC-of-LUMA-NONPHYS_OPS-97. The response to PC-of-LUMA-NONPHYS_OPS-97 contained seven (7) redacted attachments⁶, which encompassed various contracts subscribed between LUMA and its external legal counsels. Portions of these attachments contain protected personal identifiers of representatives of LUMA and the respective legal counsel.

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.

On December 22, 2025, the Hearing Examiner issued an *Order on Exhibits, Miscellaneous Post-Hearing Matters, and Legal Issues*, whereby he signaled responses to requests for information that had been filed confidentially, but were missing the corresponding memorandum of law. In light of this, LUMA is hereby submitting this memorandum of law that outlines and explains the legal basis for the confidential treatment of the attachments to the responses to ROIs NPFGC-of-LUMA-LOAD_FOR-23, PC-of-LUMA-NONPHYS_OPS-97 and PC-OF-LUMA-NONPHYS_OPS-106.

⁶ To note, while LUMA's response to *PC-of-LUMA-NONPHYS_OPS-97*, and its original five (5) attachments, were submitted on November 25, 2025, two additional documents (attachments) were submitted on December 7, 2025, in compliance with a bench order issued by Energy Bureau consultant, Guy Mazza, during the December 2, 2025 evidentiary hearing.

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 17-2019⁷ 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 need 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).

⁷ Known as the “Puerto Rico Energy Public Policy Act” (hereinafter, “Act 17-2019”).

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 regards to access 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.

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. Right to Privacy

Portions of *PC-of-LUMA-NONPHYS_OPS-106_Attachment_1*, *PC-of-LUMA-NONPHYS_OPS-106_Attachment_2*, *PC-of-LUMA-NONPHYS_OPS-97_Attachment_1*, *PC-of-LUMA-NONPHYS_OPS-97_Attachment_2*, *PC-of-LUMA-NONPHYS_OPS-97_Attachment_3*, *PC-of-LUMA-NONPHYS_OPS-97_Attachment_4*, *PC-of-LUMA-NONPHYS_OPS-97_Attachment_5*, *PC-of-LUMA-NONPHYS_OPS-97_DLA PR Engagement (Federal Funds).pdf*, and *PC-of-LUMA-NONPHYS_OPS-97_Engagement Letter LUMA-Puerto Rico (PR law matters).pdf*, as identified in Section V of this memorandum, include personal identifiers such as LUMA personnels’ names, addresses and signatures, third-party names, signatures, addresses, employer identification numbers, and sensitive financial information. LUMA respectfully requests that this protected information be maintained confidentially, given that disclosure raises the risk of misuse. LUMA also requests that the bank account numbers found in these attachments be maintained confidentially, as they constitute sensitive financial information. The confidential treatment of this personal and sensitive 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”).

On balance, the public interest in protecting privacy weighs in favor of providing confidential treatment. It is respectfully concluded that the redaction of the aforementioned information does not affect the public’s or the Energy Bureau’s review of LUMA’s responses to *PC-of-LUMA-NONPHYS_OPS-106* and *PC-of-LUMA-NONPHYS_OPS-97*, nor interfere with processes before this Energy Bureau. Therefore, on balance, the public interest in protecting privacy weighs in favor of protecting the relevant portions. Accordingly, LUMA requests that such treatment be granted.

2. Trade Secret / Third-Party Proprietary Information

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 Sections 4 (ix) and (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 and (2) trade secrets protected by a contract, statute, or judicial decision).

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 Gonzalez*, 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 Perkins Coie's services proposal contained in *PC-of-LUMA-NONPHYS OPS-97 Attachment 1*. The referenced service proposal constitutes a trade secret under Section 3 of Act 80-2011, as they possess independent economic value and provide a business advantage by not being generally known or readily accessible to competitors or the public. Disclosure of this information would risk causing competitive harm to LUMA's external counsel and undermining the public policy favoring

the protection of commercially valuable confidential information. Accordingly, LUMA requests that the Energy Bureau grant confidential treatment to *PC-of-LUMA-NONPHYS_OPS-97_Attachment 1*, to safeguard the integrity of trade secrets and ensure compliance with the statutory protections afforded under Puerto Rico law.

Moreover, the portions of Attachments 4 and 5 to LUMA's response to NPFGC-of-LUMA-LOAD_FOR-23, identified in Section V of the present memorandum, involve documents containing third-party proprietary information that were filed as part of LUMA's October 17, 2025 submittal of the Integrated Resource Plan, in Case No. NEPR-AP-2023-0004. Portions of the information contained therein constitute commercial or financial information within Section 4(x) of Act 122-2019, as they possess independent economic value and provide a business advantage by virtue of not being generally known or readily accessible to competitors or the public. Reasonable measures have been taken to maintain the confidentiality of this information, consistent with statutory requirements. Disclosure would risk causing competitive harm to the third party and undermining the public policy favoring the protection of commercially valuable confidential information. Therefore, LUMA requests that the Energy Bureau grant confidential treatment to *NPFGC-of-LUMA-LOAD_FOR-23_Attachment 4* and *NPFGC-of-LUMA-LOAD_FOR-23_Attachment 5*, to ensure compliance with the statutory protections afforded under Puerto Rico law.

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
<i>NPFGC-of-LUMA-LOAD_FOR-23 Attachment_4</i>	<i>IRP Forecast with Load Modifiers.xlsx</i> Whole document	Third-Party Proprietary Information and arguments in Memorandum of Law presented in case no. NEPR-AP-2023-0004 on October 29, 2025, that are incorporated by reference	November 18, 2025
<i>NPFGC-of-LUMA-LOAD_FOR-23 Attachment_5</i>	<i>“Generation Fleet Overview”</i> Tab Row 4, Columns J & K	Third-Party Proprietary Information and arguments in Memorandum of Law presented in case no. NEPR-AP-2023-0004 on October 29, 2025, that are incorporated by reference	November 18, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97 Attachment_1</i>	Names and signatures Pages 1, 10, 12	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97 Attachment_2</i>	Names and signatures Pages 1, 4	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97 Attachment_3</i>	Names, signatures, registration numbers Pages 1, 10, 11, 12, 13, 14, 20, 28, 29	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 2025

Document	Confidential Portions	Legal Basis for Confidentiality	Date Filed
<i>PC-of-LUMA-NONPHYS_OPS-97</i> <i>Attachment_4</i>	Names, signatures, registration numbers Pages 1, 2	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97</i> <i>Attachment_5</i>	Names, signatures, registration numbers Pages 1, 10, 11, 13, 23, 40, 41	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97</i> <i>DLA PR Engagement (Federal Funds).pdf</i>	Names and signatures Pages 1, 4	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	December 7, 2025
<i>PC-of-LUMA-NONPHYS_OPS-97</i> <i>Engagement Letter LUMA-Puerto Rico (PR law matters).pdf</i>	Names and signatures Pages 1, 4, 5	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	December 7, 2025
<i>PC-of-LUMA-NONPHYS_OPS-106</i> <i>Attachment_1</i>	Names, addresses, EINs, signatures Pages 10, 12, 42 Service Proposal Pages 14-19	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10) Trade Secret, Act 80-2011, 10 LPRA §§ 4131-4144	November 25, 2025

Document	Confidential Portions	Legal Basis for Confidentiality	Date Filed
<i>PC-of-LUMA-NONPHYS_OPS-106</i> <i>Attachment_2</i>	Names, addresses, EINs, signatures Pages 3, 8, 9, 10, 11, 12,	Right to privacy (<i>see e.g.</i> , Const. ELA, Art. II, Sections 8 and 10)	November 25, 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 NPFGC-of-LUMA-LOAD_FOR-23, PC-of-LUMA-NONPHYS_OPS-97 and PC-OF-LUMA-NONPHYS_OPS-106 under seal of confidentiality.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of December, 2025.

WE HEREBY CERTIFY that this Memorandum was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Memorandum 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;

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