

**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 LUMA Ex. 1080**

**REQUEST FOR CONFIDENTIAL TREATMENT OF LUMA EX. 1080
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

1. 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 Ex. 1080 contain Critical Energy Infrastructure Information that garners protection from public disclosure in accordance with applicable federal statutes and regulations. As set forth below, applicable legal authority compels the relief requested herein.

II. Procedural Background

2. 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.

3. 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”, 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”).

4. Furthermore, the February 12th Order states that the Energy Bureau will decide each confidentiality claim expeditiously and will, in accordance with Article 6.15 of Act No. 57-2014, 22 LPRA § 1054n (2025), proceed if it deems 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.

5. In what is pertinent to this memorandum, the evidentiary hearings for this captioned proceeding were held from November 12, 2025, through December 19, 2025. Throughout said

hearings, the Energy Bureau’s Commissioners, the Honorable Hearing Examiner, and the Energy Bureau’s Consultants issued a series of requests for information that would later take the form of bench orders. Per the Hearing Examiner’s guidance, compliance with these bench orders would come by way of *late-filed exhibits* filed by the respective parties. Following the conclusion of the evidentiary hearings, on December 22, 2025, the Hearing Examiner issued an Order on Exhibits, Miscellaneous Post-Hearing Matters, and Legal Issues (“December 22nd Order”), identifying all pending bench orders and setting January 5, 2025 as the deadline for parties to comply with the same.

6. On January 5, 2026, LUMA submitted its response to a bench order issued by Energy Bureau Consultant, Jorge Camacho,¹ by way of the LUMA Ex. 1080 filed through the Accion Evidentiary Platform. The referenced response includes confidential Critical Energy Infrastructure that 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 Puerto Rico’s electric system.

7. 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 attachment mentioned above. These actions have been taken to protect the information considered confidential. LUMA is hereby submitting this memorandum of law that outlines and explains the legal basis for the confidential treatment of LUMA Ex. 1080.

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

¹ Specifically, the bench order captured in the 7th Row of the 2nd page of the Appendix to December 22nd Order, <https://energia.pr.gov/wp-content/uploads/sites/7/2025/12/20251222-AP20230003-Hearing-Examiners-Order-on-Exhibits-Miscellaneous.pdf>. (“Provide information on when the last tests for penetration of the telecom network were done and when they will next be performed (this is deferred in the constrained budget)”).

8. 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).

9. 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).

10. 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).

11. 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 identifying the confidential information, a summary of the legal basis for the confidential designation, and a summary of the reasons each claim or designation meets the applicable legal basis for confidentiality. *Id.*, paragraph 3. The party that seeks confidential treatment of information filed with the Energy Bureau must also file both a "redacted" or "public version" and an "unredacted" or "confidential" version of the document that contains confidential information. *Id.*, paragraph 6.

12. The Energy Bureau's Policy on Confidential Information also states the following with regards to access to trade secret information once determined to be Validated Confidential Information:

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).

13. 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

14. Under Act No. 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.” PR Laws Ann. Tit. 3 § 10124(p) (2025), 3 LPRC § 10124(p) (2025).² 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 (2025), state that:

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

² With regards to Act 40-2024’s applicability to LUMA, as Operator of the T&D System, said statute provides the following:

The provisions of this chapter shall apply to the Executive Branch including all departments, boards, instrumentalities, commissions, bureaus, offices, agencies, administrations or bodies, political subdivisions, public corporations, and municipalities. **It shall likewise apply to every natural or juridical person doing business or having contracts with the Government including, but not limited to, private persons performing public services and duties**, but only with respect to the public services and duties being performed; any public or private administration exercise in which public resources or funds were committed or invested (directly or indirectly), or in which any public servant exercised his authority with regards to the data collected as a result of such activities.

Section 2 of Act 40-2024, PR Laws Ann. Tit. 3 § 10122, 3 LPRC § 10122 (2025) (emphasis ours).

- (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.

15. 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.*

16. The Critical Infrastructure Information Act of 2002, 6 U.S.C. §§ 671-674 (2025), part of the Homeland Security Act of 2002, protects critical infrastructure information (“CII”).³

³ Regarding protection of voluntary disclosures of critical infrastructure information, 6 U.S.C. § 673, provides in pertinent part, that CII:

- (A) shall be exempt from disclosure under the Freedom of Information Act;
- (B) shall not be subject to any agency rules or judicial doctrine regarding ex parte communications with a decision making official;
- (C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
- (D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
 - (i) in furtherance of an investigation or the prosecution of a criminal act; or
 - (ii) when disclosure of the information would be—
 - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
 - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office;
- (E) shall not, be provided to a State or local government or government agency; of information or records;
 - (i) be made available pursuant to any State or local law requiring disclosure of information or records;
 - (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or

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. § 650 (4) (2025); 6 U.S.C. § 671 (3).⁴

17. LUMA Ex. 1080 contains detailed information regarding information regarding the Telecom Network’s OT security architecture, controls, and testing approach, including the IT/OT distinction, the exclusion of active penetration testing due to operational risk and a prior RTU shutdown incident, passive-monitoring tool recommendations, specific segmentation and NERC CIP-aligned protections, and the testing history and schedule. Public disclosure of this detailed information would provide malicious actors with a roadmap to potential vulnerabilities in LUMA’s organizational defenses. This could increase the risk of targeted cyberattacks, social engineering, or other security breaches aimed at exploiting perceived gaps.

18. Granting confidential treatment to the identified portions of LUMA Ex. 1080 is not only consistent with hallmark legal standards concerning CEII but is also fully consistent with, and in fact advances, Puerto Rico’s public policy objectives as established by Act 40-2024. Section 3 of Act 40-2024⁵ expressly mandates the protection and maintenance of the confidentiality,

(iii) be used other than for the purpose of protecting critical Infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act.

(F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

⁴ CII includes the following types of information:

(A) actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;

(B) the ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or

(C) any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, construction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

6 U.S.C. § 650 (4).

⁵ Section 3 of Act 40-2024 reads as follows:

It is hereby established as the public policy of Puerto Rico:

(1) To establish minimum cybersecurity standards and principles based on the “zero trust architecture” concept in order to enable the Government to incorporate cybernetic and electronic technologies into Government operations so as to transform and streamline intragovernmental relations, and government relations with the general public, as well as with local and foreign businesses, thus making the Government more accessible, effective, and transparent, in a secure and reliable manner.

(2) To establish as policy that all covered agencies, or natural or juridical persons, as well as their agents, insurers, or guarantors are prohibited from making any ransom payments in response to a ransomware attack and that they shall collaborate with the Cybersecurity and Infrastructure Security Agency of the Department of Homeland Security, as provided in the State and Local Government Cybersecurity Act of 2021. As an exception, and on a case-by-case basis, a Ransom Payment may be considered in the case of:

(a) Critical infrastructure; or

(b) Imminent risk of death;

If a ransom payment is made due to any of the aforementioned reasons, upon consultation with the Office, it shall not be deemed a violation of this section.

(3) To protect and maintain the confidentiality, integrity, and availability of the data stored and/or maintained by the Government’s Information Resources and the related infrastructure assets, whether the data is at rest (stored), in-transit (being sent or received), or being created or transformed (processed).

(4) To increase efforts to coordinate and improve the security of government networks and critical infrastructure as well as protect the data contained therein.

(5) To enhance the capabilities and efforts to block, detect, prevent, protect from, and respond to threats against information resources and Government data.

(6) To ensure a stable and secure Information Technology (IT) environment through the implementation of measures as are appropriate to mitigate cybersecurity risks by preventing, reducing, and limiting data loss or the degradation of the Government’s information resources, and by implementing corrective measures and protocols that ensure that any imminent attack shall be addressed and resolved swiftly.

(7) To protect the right to privacy of citizens without limiting their right to peaceful coexistence online.

(8) To stop and punish persons misusing any type of information technology to commit criminal acts.

(9) To comply with the basic cybersecurity guidelines established by the President of the United States, the Hon. Joe Biden, through the Executive Order issued on May 12, 2021, and with any subsequent orders related to cybersecurity.

integrity, and availability of government data and related infrastructure assets, including those pertaining to critical infrastructure such as Puerto Rico’s electric transmission and distribution system. Public disclosure of this detailed cybersecurity information would directly undermine these statutory objectives. Furthermore, Act 40-2024 emphasizes the need to implement minimum cybersecurity standards, coordinate security efforts, and ensure a stable and secure IT environment – goals that are only achievable if sensitive information is shielded from public exposure. Therefore, granting confidential treatment to this information is not only prudent but is also a legal imperative that aligns with the legislative intent to safeguard critical infrastructure, protect public safety, and comply with both local and federal cybersecurity requirements.

19. Disclosure of such information to the public would expose the electric grid to heightened risks of sabotage, cyberattacks, and other malicious acts, as it could be used by bad actors to plan and execute attacks on the system. Moreover, public disclosure of this information would undermine LUMA’s ability to protect its assets, employees, and the public, and would contravene prudent utility practice as well as regulatory and contractual obligations under the *Transmission and Distribution System Operation and Maintenance Agreement (T&D OMA)*.

20. The Energy Bureau has previously recognized the need to protect such information. Particularly, in proceedings related to Data Security⁶ this Energy Bureau, *motu proprio*, has conducted proceedings – pertaining to subject matter closely aligned with the content of the information provided by way of LUMA Exhibit 1080 – confidentially, thereby recognizing the need to protect the above outlined CEII from public disclosure. In addition, it bears emphasis that discussions involving cybersecurity matters have been conducted in confidential session during the corresponding evidentiary hearings, reflecting the Energy Bureau and its Hearing Examiner’s

⁶ Case No. NEPR-MI-2020-0017, *In re Review of the Puerto Rico Electric Power Authority Data Security Plan*.

recognition that such content warrants non-public handling to safeguard critical infrastructure and public safety. Consistent with that practice and the underlying rationale, this response addresses a bench order issued in a confidential session and pertains to the same category of sensitive cybersecurity subject matter. Accordingly, LUMA respectfully requests that this response be likewise received under seal and maintained as confidential throughout these proceedings.

21. The requested confidential treatment is essential to prevent the exposure of critical infrastructure to unnecessary risks and to comply with both federal and Puerto Rico law, as well as established regulatory policy, and should, thus, be granted accordingly.

V. Identification of Confidential Information within LUMA Ex. 1080

20. 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.

<i>Document</i>	Confidential Portions	Legal Basis for Confidentiality	Date Filed
<i>LUMA Ex. 1080</i> Late Filed Exhibit, Bench Order of December 2, 2025	Pages 1 and 2: Redacted portions of Ms. Crystal Allen's response to Mr. Jorge Camacho's Bench Order of December 2, 2025	Critical Energy Infrastructure Information 18 C.F.R. §388.113; 6 U.S.C. §§ 671-674.	January 5, 2026

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 Ex. 1080 under seal of confidentiality.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of January, 2026.

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; 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; javrui@sesapr.org; mrios@arroyorioslaw.com; ccordero@arroyorioslaw.com; **Wal-Mart Puerto Rico, Inc.**, Cfl@mcvpr.com; apc@mcvpr.com; **Solar United Neighbors**, ramonluisnieves@rlnlegal.com; **Mr. Victor González**, victorluisgonzalez@yahoo.com; and **the Energy Bureau's Consultants**, Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; jorge@maxetaenergy.com; rafael@maxetaenergy.com; RSmithLA@aol.com; msdady@gmail.com; mcranston29@gmail.com; dawn.bisdorf@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; guy@maxetaenergy.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com; carl.pechman@keylogic.com; bernard.neenan@keylogic.com; tara.hamilton@ethree.com; aryeh.goldparker@ethree.com; roger@maxetaenergy.com; Shadi@acciongroup.com; Gerard.Gil@ankura.com;

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