

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

**NEPR**

**Received:**

**Mar 6, 2026**

**12:12 PM**

**IN RE: PUERTO RICO  
ELECTRIC POWER  
AUTHORITY RATE REVIEW**

**CASE NUM. NEPR-AP-2023-0003**

**Subject:**

**SUN-SESA Brief on Legal and Policy  
Issues**

**JOINT SUN-SESA BRIEF ON LEGAL AND POLICY ISSUES**

**TABLE OF CONTENTS**

I. AFFORDABILITY AND PRACTICABILITY.....4-6

II. LEGACY AND UNSECURED DEBT .....6-7

III. PENSION RIDER RATE DESIGN ..... 7-9

IV. DECOUPLING ADJUSTMENTS.....10-12

V. CONCLUSION .....12-13

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMIT..... .14

CERTIFICATION ..... 14-15

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

**IN RE: PUERTO RICO  
ELECTRIC POWER  
AUTHORITY RATE REVIEW**

**CASE NUM. NEPR-AP-2023-0003**

**Subject:**

**SUN-SESA Brief on Legal and Policy  
Issues**

**JOINT SESA-SUN BRIEF ON LEGAL AND POLICY ISSUES**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

Comes now SOLAR UNITED NEIGHBORS and the SOLAR AND ENERGY STORAGE ASSOCIATION OF PUERTO RICO, represented by the undersigned attorneys, and very respectfully STATE, ALLEGE and PRAY:

1. SOLAR UNITED NEIGHBORS (“SUN”) is a nonprofit corporation dedicated to creating a clean, equitable, resilient energy system that benefits everyone. It helps people go solar, join, and fight for their energy rights. SUN’s vision is a clean, equitable energy system that directs control and benefits back to local communities, with solar on every roof and money in every pocket.

2. The SOLAR AND ENERGY STORAGE ASSOCIATION OF PUERTO RICO (“SESA”) is a nonprofit association that represents Puerto Rico's solar and energy storage industries. SESA advocates for solar and storage technologies as a central solution to

Puerto Rico's energy needs, promoting public policy that will benefit the growth of these industries.

3. As per the *Hearing Examiner's Order on Exhibits, Miscellaneous Post-Hearing Matters, and Legal Issues* issued on December 22<sup>nd</sup>, 2025, SESA and SUN file this Brief on Legal and Policy Topics jointly.

4. SUN and SESA will only address topics 3 (Affordability and practicability), 4 (Legacy debt and unsecured debt), 6 (Pension rider rate design) and 9 (Decoupling adjustments) as set out in the cited *Hearing Examiner's Order on Exhibits, Miscellaneous Post-Hearing Matters, and Legal Issues*.

#### I. AFFORDABILITY AND PRACTICABILITY

5. On the captioned topic, the Hearing Examiner asks parties to address the following questions:

Under the statutes, what is the extent of the Energy Bureau's duty, and the extent of its discretion, to use affordability as a criterion in determining (a) the revenue requirement, (b) revenue allocation, and (c) rate design? What, if anything, do the statutes tell us about the distinction between, and the relationship between, affordability (the amount that customers are able to pay) and practicability (whether they will pay what is necessary to produce the revenues required by the approved revenue requirement)?

6. The proposed rate changes under consideration by the Puerto Rico Energy Bureau (PREB) present significant issues regarding "affordability", which is a central tenet of Puerto Rico's net metering statute. As we have stated in prior briefs, including thorough evidentiary, factual and legal discussion in our *Joint Brief on Rate Design* "raising the fixed charge imposes disproportionate burdens on low net consumption

customers (which include net metering customers and low income customers)".<sup>1</sup> The proposed increases in fixed and non-bypassable charges violate the statutory definition of net metering and would further breach that statute by having the effect of discouraging new customers from adopting solar energy.

7. The net metering statute was enacted to facilitate the adoption of solar energy in Puerto Rico. It explicitly mandates that the rates approved by the Bureau shall not "discourage entering into net metering agreements." Section 4(c) of Act 114-2007 (22 L.P.R.A. § 1014). In this sense, the PREB has a legal obligation to ensure that any rates set do not create economic barriers for potential net metering customers. This duty encompasses a careful consideration of "affordability" as a criterion in rate setting because changing the economics that make it possible -affordable- for Puerto Rican customers to solar via net metering agreements.

8. Under rates in force today, the value proposition that allows Puerto Rican customers to install solar and batteries has a central aspect: the benefit to customers of lowering their monthly bills down to \$4 via net metering, thus freeing the cashflow they used to pay their monthly utility bill, and use it to pay their monthly lease or loan payment. The proposed rates include substantial increases in fixed fees (from the current \$4 residential minimum bill to over \$40.29).<sup>2</sup> The charges, as proposed, would be paid by customers regardless of their energy usage or renewable generation, fundamentally altering the economic equation for prospective solar adopters, deterring potential

---

<sup>1</sup> See *Joint SUN-SESA Brief on Rate Design* (17/02/2026), <https://energia.pr.gov/wp-content/uploads/sites/7/2026/02/20260217-AP20230003-Joint-Sun-SESA-Brief-on-Rate-Design-Feb-17.pdf>.

<sup>2</sup> See *LUMA's Revised Motion in Compliance with July 31st Order Regarding Revision of Pension Rider* (26/11/2025), (referencing \$10.89/month charge for the GRS class), <https://energia.pr.gov/wp-content/uploads/sites/7/2025/11/20251125-AP20230003-LUMAs-Revised-Motion.pdf>.

customers from entering into net metering agreements. The financial burden imposed by higher fixed charges would contradict the net metering statute by creating a significant affordability barrier to solar adoption.

9. In sum, PREB must carefully consider these implications to fulfill its statutory obligations and ensure that the rates set do not discourage new net metering agreements. Upholding the principle of affordability is essential for the continued growth and success of solar energy initiatives in Puerto Rico.

## II. LEGACY AND UNSECURED DEBT

10. On this topic, the Hearing Examiner asks parties to address the following questions:

Does PROMESA preempt the Energy Bureau from creating a placeholder rider with a zero amount? Does the answer differ depending on whether the debt is bondholder debt or unsecured debt?

11. On whether PROMESA preempts the Energy Bureau from creating a placeholder rider, our understanding is that PROMESA is silent on the specific topic of rate design by the Bureau. PROMESA sec. 503(F)(iv) only makes a tangentially related general statement to “support the Energy Commission of Puerto Rico in achievement of its goal of reducing energy costs and ensuring affordable energy rates for consumers and business.” 48 U.S.C. 2213.

12. More significant is that, as proposed by LUMA (see, LUMA EX.362.5), the zero dollar Legacy Debt Rider (LDR) placeholder would be illegal as a “non-bypassable” charge. Section 4(c) of Act 114-2007 (22 L.P.R.A. § 1014) **prohibits** (1) charges applicable to net-metering customers that modify the export credit formula or net-consumption structure (2) direct or indirect charges on renewable generation, (3)

discriminatory charges, (4) and as mentioned in the prior discussion, any charge that discourages entering into net metering agreements. Structuring the LDR as “non-bypassable”, literally means forcing net metering clients to pay said charge regardless of their net consumption, a violation of Act 114. And as discussed in the prior section, similar to raised fixed fees, this LDR charge, as it would not be based on net consumption, alters the economics necessary for solar adoption thus discouraging potential customers from entering into net metering agreements. Finally, the proposed LDR would also be illegally discriminatory under Act 114, as its design targets or affects a specific customer class: net metering clients.

### III. PENSION RIDER RATE DESIGN

13. On this topic, the Hearing Examiner the following questions:

The provisional-rate order established the pension rider amount as a per-kWh charge, but required LUMA to convert that charge to a fixed per-customer charge as soon as possible. Is a fixed per-customer charge lawful, given Section 4 of Act 114-2007? If the pension costs were included in base rates, rather than recovered through a rider, would that same statutory provision then require the pension to be recovered via a kWh charge? If the answer to that question is yes, why would the answer be different for a rider?

14. As discussed in the prior sections, LUMA’s request to restructure its rate design by shifting revenue recovery away from volumetric charges and toward higher fixed and non-bypassable monthly charges is illegal under Section 4 of Act 114. Act 114 requires that net-metering export credits and charges and values be based on “net consumption.” By shifting recovery from a per-kWh charge to a fixed monthly fee, said rate design shift effectively dissociates part of a customer’s bill from consumption entirely, thereby diminishing the economic value of net metering for customers, customers that offset important portions of their load with their solar generation.

15. Section 4(c) states unequivocally: “No direct or indirect charge shall be imposed on the generation of renewable energy by prosumers.” Section 4(c) of Act 114-2007, 22 L.P.R.A. § 1014. As such, customers with low net consumption—a usage pattern associated with net-metering participants (as well as others, such as low income customers and highly efficient customers), are penalized by dramatic bill increases created by fixed rates, as that design shifts cost responsibility from volumetric recovery (which aligns with consumption) to fixed fees (which do not). Because solar customers reduce their net consumption by producing renewable energy, a fixed pension charge penalizes their low net consumption and is functionally equivalent to imposing a charge on the renewable generation itself, certainly a proscribed indirect charge.

16. Furthermore, Section 4(c) also provides that: “the rate approved by the Bureau for net metering customers shall not be discriminatory or discourage entering into net metering agreements.” By dramatically increasing the bills of customers who generate much of their own energy, fixed fees materially alter the payback period and economic value of distributed solar, naturally discouraging adoption. As mentioned, customers with low net consumption are penalized and by dramatic bill increases created by fixed rates. Conversely, high energy consumers are not penalized when volumetric charges are transferred to fixed fees, which also violates Act 114’s ban on “discriminatory” charges. High energy consumers - comprised of the wealthiest of society - would be financially rewarded if any existing or proposed volumetric charges were to be converted to fixed charges, with those financial rewards being paid to them by the lowest-consumption customers. If charges are volumetric and based on net consumption, they would be both in accordance with Puerto Rico law, and also have the fair cost allocation impact of higher

consumption "energy hog" customers paying more, and those who are poorer - and those who have invested in energy efficiency and/or solar production to lower their net consumption - paying less. A charge that overwhelmingly increases costs for those who self-generate renewable energy is structurally "discriminatory" and "discouraging" by design, and thus illegal under Act 114.

17. PREB thus has a legal obligation to ensure that any rates set -or charges created- do not create economic barriers for potential net metering customers. As mentioned, the value proposition that allows Puerto Rican customers to install solar and batteries has its core policy, that customers have the possibility of lowering their monthly bills down to \$4 via net metering. But a fixed pension charge must be paid by customers regardless of their energy usage or renewable generation, illegally altering the economic equation for current and also prospective solar adopters.

18. As Act 114 Section 4(c) prohibits the Energy Bureau from approving any charge that is discriminatory, indirectly charges renewable generation, or discourages participation in net metering, the Bureau should maintain the current \$4.00 minimum bill, to avoid Act 114-2007 breaches. The net metering statute was enacted to incentivize and facilitate the adoption of solar energy in Puerto Rico and it is being successful.<sup>3</sup>

19. To fully answer the Hearing Examiner's question: if the pension charge were to be structured as a purely volumetric rider based on a customer's net consumption, that

---

<sup>3</sup> As periodically informed by LUMA in docket NEPR-MI-2019-0016 (*In Re: Informes de Progreso de Interconexión de la Autoridad de Energía Eléctrica de Puerto Rico*), close to 200,000 ratepayers have net-metered solar in Puerto Rico. Note that total residential customer energy consumption (and billing) has increased -not decreased- alongside NEM growth. See, Estrada Rivera, Joseline N. Direct Testimony, LUMA Exhibit 72.0, <https://energia.pr.gov/wp-content/uploads/sites/7/2025/07/LUMA-Exhibit-72.0-Direct-Testimony-of-Joseline-Estrada-Rivera.pdf>; Ming, Zachary, Expert Report on Billing Determinants, Cost Allocation, Revenue Allocation, and Rate Design (PC Exhibit 61.0), Table 3 (Comparison to FY2017 Rate Case Forecast), <https://energia.pr.gov/wp-content/uploads/sites/7/2025/10/20251006-AP20230003-HE-ORder-Expert-Reports-1.pdf>.

design would not violate Act 114. Similarly, the proposed LDR is illegal because although it is volumetric (tied to consumption), it is also non-bypassable (based on gross consumption, not net consumption). Therefore, a pension charge that is truly volumetric and based on net consumption would pose no Act 114 problem and would be fully legal. This is the way the pension charge is operating today, and it poses no legal problems.

#### IV. DECOUPLING ADJUSTMENTS

20. On decoupling, the Hearing Examiner asks the following questions:

Concerning decoupling-related surcharges and surcredits necessitated by actual revenue differing from the state revenue requirement: Do the statutes allow an annual adjustment outside of a rider and outside of a new rate case—that is, an adjustment to the existing per-kWh rate? As long as a description of, and explanation for, this treatment appears in the order creating the decoupling measure, is there any statutory problem including but not limited to the prohibition against retroactive ratemaking?

21. Yes, the Puerto Rico statutes—namely Act 57-2014 and Act 17-2019, appear to provide authority for the PREB to implement annual revenue-decoupling adjustments to existing per-kWh rates outside of a rider and outside of a new rate case. Moreover, so long as the decoupling mechanism—including its formula, triggers, reconciliation process, and adjustment methodology—is fully described and explained in the rate order that creates it, such adjustments do not constitute retroactive ratemaking. They are prospective, formula-driven, and pre-authorized, placing them within the category of lawful ratemaking mechanisms.

22. Section 6.25B of Act 57-2014, as amended, provides that the Bureau "may consider using, but not limited to [...] i. Decoupling mechanisms [...] vi. Formula Ratemaking and rate review mechanism; [and] vii. Reconciliation Mechanisms." The simultaneous listing of "decoupling mechanisms," "formula ratemaking and rate review

mechanism," and "reconciliation mechanisms" seem to demonstrate that the Legislature understood these to be distinct regulatory tools that could be deployed independently or in combination. A revenue-decoupling mechanism inherently requires a reconciliation step—comparing actual revenues to the allowed revenue requirement and applying a formulaic surcharge or surcredit—and the statute appears to authorize all three components.

23. Additionally, Section 1.10(m) of Act 17-2019, as amended, although in the context of “Duties and Responsibilities of Electric Power Service Companies”, mentions that electric power companies may not claim or charge certain retroactive charges yet that that shall “not be applicable to periodic charges or adjustments provided in the rate approved by the Bureau”, statutory language which expressly mentions Bureau powers to periodically adjust its approved rates.

24. It is also our view that a pre-authorized decoupling mechanism does not violate the retroactive ratemaking prohibition. After an appropriate administrative proceeding, the mechanism could be established, to apply prospectively, in a final order. The order that creates the decoupling mechanism would define, in advance, the pertinent formula, the baseline revenue requirement, the reconciliation period, the adjustment method, etc. All parties would have had notice and opportunity to contest the mechanism during said proceeding. Once established, the mechanism would operate going forward. This is fundamentally different from a regulator unilaterally deciding, after the fact, to change rates that were already in effect. In the current rate case, it would be impossible to establish any decoupling mechanism, as LUMA has not proposed any details of how the

decoupling would be calculated, and stakeholders have not been afforded the opportunity to comment on how they would want the actual decoupling to be calculated and occur.

25. Note that Puerto Rico already employs analogous pre-authorized adjustment mechanisms of uncontested legality and no one considers retroactive ratemaking, for example, the Fuel Adjustment Clause (FCA) and Purchased Power Cost Adjustment (PPCA) clause, which adjust quarterly based on actual fuel/purchased power costs vs. baseline amounts embedded in base rates. Both operate on the same principle: a pre-authorized formula adjusts future charges based on observed deviations from projected baselines. If the FCA and transition charge mechanisms are lawful, then a decoupling mechanism applying the identical logic to non-fuel revenue is equally lawful.

26. Apart from the legal discussion above, SESA and SUN support revenue decoupling mechanisms that, if properly designed and implemented, can promote renewable adoption and reduce utility resistance to renewable growth by guaranteeing utility revenues. These mechanisms also incentivize demand-side management and help safeguard affordability for low-usage residential consumers. Well-structured decoupling arrangements can advance core energy policy objectives—including energy efficiency and clean energy expansion—while maintaining the financial stability of utilities.

27. Accordingly, we respectfully urge the Honorable Bureau to initiate a formal, professionally moderated stakeholder engagement process—whether integrated into the instant docket (NEPR-AP-2023-0003) or established as a discrete proceeding—with a clearly prescribed timeline that will culminate in the submission of a draft revenue decoupling proposal for the Bureau's formal review and deliberation.

#### IV. CONCLUSION

In sum, SUN and SESA respectfully submit that it is the Bureau's statutory duty—particularly under Act 114-2007, as amended—to deny proposed increases in fixed charges and charges not based on net consumption, including a Legacy Debt Rider and a fixed pension rider, that would both constitute indirect charges on renewable generation, discriminate against low net-consumption customers, and discourage entry into net metering agreements. Conversely, a properly structured, volumetric approach to cost recovery, based on net consumption, would comply with statutory mandates. With respect to decoupling, SUN and SESA conclude that Puerto Rico law authorizes a prospective, formula-based mechanism established in a final order, provided it is fully defined in advance and applied transparently.

Accordingly, we urge the Bureau to reject unlawful fixed charge rate designs, as well as charges not based on net consumption; preserve the current minimum bill structure; and initiate a formal stakeholder process to develop a legally sound decoupling framework that advances affordability, renewable growth, and regulatory stability.

**WHEREFORE**, SOLAR UNITED NEIGHBORS and SOLAR AND ENERGY STORAGE ASSOCIATION OF PUERTO RICO respectfully submit the instant Legal Issues Brief and request that this Honorable Bureau consider and adopt our rationales and recommendations.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6<sup>th</sup> day of March 2026.

**FOR SOLAR UNITED NEIGHBORS:**

**RL LEGAL & CONSULTING  
SERVICES, LLC**  
381 Ave. Felisa Rincon de

**FOR SOLAR AND ENERGY STORAGE  
ASSOCIATION OF PUERTO RICO:**

**McCONNELL VALDÉS LLC**  
PO Box 364225  
San Juan, Puerto Rico 00936-4225

Apt. 209  
San Juan, Puerto Rico, 00926

270 Muñoz Rivera Avenue  
San Juan, Puerto Rico 00918

**s/Ramón Luis Nieves**  
RUA 13526  
ramonluisnieves@rlnlegal.com  
Tel. (787) 607-7093

**s/Carlos J. Fernández Lugo**  
PR Supreme Court ID No.11033  
Carlos J. Fernández Lugo  
cfl@mcvpr.com  
(787) 250-5669

**s/André J. Palerm Colón**  
apc@mcvpr.com  
André J. Palerm Colón  
PR Supreme Court ID No. 21196  
(787) 250-5636

**s/Javier Rúa-Jovet**  
javrua@sesapr.org  
Javier Rúa-Jovet  
Chief Policy Officer, SESA  
PR Supreme Court ID no. 12602  
(787) 396-6511

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMIT

**SOLAR UNITED NEIGHBORS** and **SOLAR AND ENERGY STORAGE ASSOCIATION OF PUERTO RICO CERTIFY** that this document has 2823 words, excluding the caption, table of contents, signature blocks, and service information.

***s/Javier Rúa-Jovet***  
***s/Ramón Luis Nieves***  
***s/Carlos J. Fernández Lugo***  
***s/André J. Palerm Colón***

CERTIFICATION

WE HEREBY CERTIFY that this document was filed using the electronic filing system of this Energy Bureau and that electronic copies of this document 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@gmlExhibitnet; Juan González, jgonzalez@gmlExhibitnet; Alexis G. Rivera Medina, arivera@gmlExhibitnet; Juan Martínez, jmartinez@gmlExhibitnet; and Natalia ZayasGodoy, nzayas@gmlExhibitnet; 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; javrua@sesapr.org; mrios@arroyorioslaw.com; ccordero@arroyorioslaw.com; Wal-Mart Puerto Rico, Inc., Cfl@mcvpr.com; apc@mcvpr.com; Solar United Neighbors, ramonluisnieves@rnlegal.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; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; gerardo\_cosme@solartekpr.net; jrinconlopez@guidehouse.com; kara.smith@weil.com; varoon.sachdev@whitecase.com; zack.schrieber@cwt.com; Isaac.Stevens@dechert.com; James.Moser@dechert.com; Kayla.Yoon@dechert.com; juan@londoneconomics.com; arrivera@nuenergypr.com; ahopkins@synapse-energy.com.