

**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: Urgent Motion for Extension of
Time to Comply with March 5th Order

**URGENT MOTION FOR EXTENSION OF TIME TO COMPLY WITH MARCH 5TH
ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU, AND ITS HEARING EXAMINER, MR. SCOTT HEMPLING:

COME NOW LUMA Energy, LLC and LUMA Energy ServCo, LLC, (jointly referred to as “LUMA”), and respectfully state and request the following:

1. On March 5, 2026, the Honorable Hearing Examiner, Mr. Scott Hempling, issued an *Order Requiring Confirmation of Annual Revenue Requirement and Submittal or Correction of Supporting Exhibits* (“March 5th Order”). Therein, the Hearing Examiner required LUMA to confirm or correct the proposed Annual Revenue Requirement (“ARR”) and to update and refile revised revenue requirement schedules by March 9, 2026.

2. The March 5th Order arose from concerns that Exhibit 1106 did not fully incorporate Genera PR LLC (“Genera”)’s final revenue requirement (as reflected in Annex 3 to LUMA’s January 9th *Motion Submitting Revised Revenue Requirement*) and did not reflect the Puerto Rico Electric Power Authority (“PREPA”)’s February 23, 2026 filing.¹ The Hearing Examiner’s stated goals were to ensure an accurate presentation of the ARR that the Puerto Rico

¹ See PREPA’s *Motion in Compliance with February 12, 2026 Hearing Examiner Order*, filed on February 23, 2026.

Energy Bureau (“Energy Bureau”) is legally bound to adjudicate in its final order, and to complete the evidentiary record with the documentary sources supporting that number.

3. As to the Hearing Examiner’s first request – that LUMA confirm that the Energy Bureau’s consultants’ spreadsheet presentation is correct or provide a substitute document explaining any differences – LUMA respectfully informs the Energy Bureau and its Hearing Examiner that it cannot confirm the accuracy of the spreadsheet as presented.

4. Upon review, LUMA has identified several concerns with the spreadsheet that preclude such confirmation. First, the Energy Bureau’s consultants’ spreadsheet does not capture LUMA’s updates and adjustments to the revenue requirement, as filed on August 28, 2025, November 11, 2025, and January 8, 2026. Second, the spreadsheet unbundles all system-level costs in a manner that results in misallocations; for example, bad debt expense incorrectly appears under the GridCo column. Third, LUMA has concerns regarding how the spreadsheet displays the revenue requirement to be funded from the base rate, as it appears to include Energy Efficiency and Demand Response program costs that are funded through separate riders rather than base rates.

5. Given these discrepancies, LUMA must provide a substitute document rather than confirm the existing spreadsheet. The process of preparing such a substitute document is time-intensive, as it requires LUMA to reconcile the relevant schedules and ensure an accurate presentation of the ARR. LUMA has been working diligently toward this end. However, the process of reviewing the Energy Bureau’s consultants’ spreadsheet, understanding its methodology, and identifying the necessary corrections has taken considerably more time than initially anticipated. Accordingly, LUMA respectfully requests an extension of time to complete this task and submit the corrected documentation.

6. As to the remaining directives set forth in the March 5th Order, LUMA confirms it is working to update and refile the Revenue Requirement Schedules to incorporate PREPA's February 23, 2026 filing, as well as Genera's final revenue requirement. Additionally, LUMA will confirm the total base rate revenue requirement stated in *LUMA's Revenue Requirement Brief* and, if necessary, file an amendment to the relevant portions of the brief where the system-wide revenue requirement is discussed.

7. In light of the foregoing, LUMA respectfully requests that the Energy Bureau, by way of its Hearing Examiner, grant LUMA an extension of two (2) business days – up and until, Wednesday, March 11, 2026 – to comply with the requirement to confirm or provide a substitute document regarding the Energy Bureau's consultants' spreadsheet. LUMA remains committed to ensuring that the evidentiary record contains an accurate and complete presentation of the ARR for adjudication.

8. LUMA respectfully submits that this request for extension is made in good faith, is the minimum necessary to complete this effort, and is not aimed at causing unnecessary delay.

WHEREFORE, LUMA respectfully requests that the Energy Bureau **take notice** of the aforementioned; and **grant** LUMA's request for an extension of time to comply with the March 5th Order, up and until Wednesday, March 11, 2026.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of March, 2026.

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 served onto the following mailing list: mvalle@gmlex.net; alexis.rivera@prepa.pr.gov; jmartinez@gmlex.net; jgonzalez@gmlex.net; nzayas@gmlex.net; Gerard.Gil@ankura.com; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; mdiconza@omm.com; golivera@omm.com; pfriedman@omm.com; msyassin@omm.com; regulatory@genera-pr.com; legal@genera-pr.com; mvazquez@vvlawpr.com; gvilanova@vvlawpr.com; dbilloch@vvlawpr.com; ratecase@genera-pr.com; jfr@sbglaw.com; hrivera@jrsp.pr.gov;

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