

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

NEPR

Received:

Apr 6, 2026

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IN RE:

THE PERFORMANCE OF THE PUERTO RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

SUBJECT: Motion to Request Additional Time to Submit Heat-Rate Related Supporting Data and Response to ROI No. 1, in Compliance with Resolution and Order Dated March 16, 2026.

MOTION TO REQUEST ADDITIONAL TIME TO SUBMIT HEAT RATE-RELATED SUPPORTING DATA AND RESPONSE TO ROI NO. 1, IN COMPLIANCE WITH RESOLUTION AND ORDER DATED MARCH 16, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera"), as agent of the Puerto Rico Electric Power Authority ("PREPA"),¹ through its counsel of record, and respectfully submits and prays as follows:

1. On March 16, 2026, the Energy Bureau issued a Resolution and Order titled *Genera's compliance with the December 19 R&O and January 27 Submission* ("March 16th Order").
2. Relevant to the instant Motion, the March 16th Order directed Genera to, among other things, submit responses to the Requirements of Information (ROIs) included in Attachment A of the March 16th Order, as well as directives to address Genera's heat rate-related metrics for certain generation units.

¹ Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* ("LGA OMA"), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority ("P3 Authority"), Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before the Energy Bureau with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

3. On March 26, 2026, Genera filed a “Motion in Compliance with Resolution and Order of March 16, 2026, and Request for Limited Extension as to Remaining Heat Rate Support” (March 26th Motion), to comply with the directives set forth in the referenced Resolution and, additionally, requested a brief extension of seven (7) days to submit (i) the remaining heat rate support necessary to address the portions of the March 16, 2026 Resolution and Order requiring the fuel consumed (in MMBtu) and generation produced (in kWh) used to calculate the heat rate metric for both the San Juan Steam and San Juan Ciclo Combinado subgroups, and (ii) to submit Genera’s Response to ROI No.1.

4. Genera has been diligently compiling all necessary data, in consultation with key operations personnel, to validate and provide the Energy Bureau with complete information regarding the remaining heat rate-related data for the San Juan Steam and San Juan Combined Cycle subgroups, as well as its comprehensive response to ROI No. 1 of Attachment A to the March 16 Resolution.

5. Notwithstanding the foregoing, Genera requires additional time to ensure that the relevant data and its response to ROI No. 1 are fully validated and clearly presented, consistent with the Energy Bureau’s expectations for accuracy and completeness. Accordingly, **Genera respectfully requests an extension to submit the remaining heat rate-related supporting data and its response to ROI No. 1 as part of its upcoming Quarterly Report for the Third Quarter of Fiscal Year 2026 (Q3 FY2026), due April 20, 2026.**

6. This request is made in good faith to support a thorough, orderly, and integrated evaluation by the Energy Bureau, particularly in light of the new Quarterly Data Template issued through the April 2, 2025 Resolution and Order, to be implemented starting with the Q3 FY2026

report. Genera reiterates its commitment to timely, accurate, and quality reporting and seeks this extension to ensure the completeness and reliability of the information provided.

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the foregoing and **grant** an extension **until April 20, 2026**, to submit, as part of Genera's Q3 FY2026 Report due on that same date: (i) all relevant supporting data concerning the San Juan Steam and San Juan Combined Cycle subgroups; and (ii) its Response to ROI No. 1 of Attachment A to the Resolution and Order dated March 16, 2026.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of April of 2026.

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CERTIFICATE OF SERVICE

I hereby certify that I filed this Motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this Motion to margarita.mercado@us.dlapiper.com; yahaira.delarosa@us.dlapiper.com; mvalle@gmlex.net; alexis.rivera@prepa.pr.gov; hrivera@jrsp.pr.gov; nzayas@gmlex.net; rcruzfranqui@gmlex.net; katiuska.bolanos-lugo@us.dlapiper.com; legal@genera-pr.com ; regulatory@genera-pr.com.

In San Juan, Puerto Rico, this 6th day of April of 2026.

/s/ Jorge Fernández-Reboredo
Jorge Fernández-Reboredo

/s/ Stephen David Romero Valle
Stephen David Romero Valle

/s/ José Javier Díaz Alonso
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