

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

<b>NEPR</b>  <b>Received:</b>  <b>Jun 9, 2026</b>  <b>6:44 PM</b>
---

**IN RE:**

**LUMA INITIAL BUDGETS AND  
RELATED TERMS OF SERVICE**

**CASE NO.: NEPR-MI-2021-0004**

**Subject:** Genera PR LLC’s Urgent Motion for Clarification and Protective Treatment Regarding FY2026 Budget-To-Actual Reconciliation and Good-Faith Expenditures Incurred under PREB-Approved Temporary and Provisional Budget Authority

**GENERA PR LLC’S URGENT MOTION FOR CLARIFICATION AND PROTECTIVE  
TREATMENT REGARDING FY2026 BUDGET-TO-ACTUAL RECONCILIATION  
AND GOOD-FAITH EXPENDITURES INCURRED UNDER PREB-APPROVED  
TEMPORARY AND PROVISIONAL BUDGET AUTHORITY**

**TO THE HONORABLE ENERGY BUREAU:**

**COMES NOW, Genera PR LLC** (“Genera”), as operator of the Legacy Generation Assets under the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement (“LGA OMA”) and as agent of the Puerto Rico Electric Power Authority (“PREPA”), through undersigned counsel, and respectfully **STATES** and **PRAYS**:

**I. Introduction**

Genera respectfully appears before the Puerto Rico Energy Bureau (“PREB” or the “Bureau”) in this Budget Docket to obtain clarification and protective guidance regarding the manner in which the *Final Resolution and Order on Electricity Rates* issued on **April 15, 2026**, in **Case No. NEPR-AP-2023-0003** (the “*Final Order*”) will be implemented for FY2026 budget-to-actual (“B2A”) and reconciliation purposes. This Motion does not seek reconsideration of the *Final Order*; those matters remain pending in the Rate Case. The relief requested here is limited to ensuring the orderly and lawful implementation of the *Final Order* within this docket, without prejudice of all the rights and prerogatives established in the LGA OMA, and with appropriate

safeguards so that FY2026 B2A variances are not treated as a basis for fines, penalties, clawbacks, adverse inferences, disallowances, or findings of imprudence or noncompliance unless the Bureau first affords Genera notice, an opportunity to explain, and makes a separate record-supported determination directed to the specific expenditure at issue.

Genera operated the Legacy Generation Assets throughout FY2026 under budget authority established by the Bureau itself, first through the Temporary Default Budget effective July 1, 2025, and later through provisional authority recognized pending resolution of the Rate Case. In reliance on that framework, Genera continued operations, awarded and amended contracts, procured materials and spare parts, mobilized vendors, performed maintenance, responded to outages, and incurred the obligations necessary to maintain system reliability. The *Final Order*, issued after roughly ten months of FY2026 had elapsed, retroactively adopted a materially reduced and restructured budget.

An order issued near the close of the fiscal year should not be administered in a manner that retroactively converts obligations authorized and incurred in good faith under the Bureau's own temporary and provisional framework into expenditures later characterized as unauthorized, imprudent, negligent, sanctionable, or subject to clawback, absent notice, an opportunity to explain, and a separate record-supported determination directed to the specific expenditure at issue. Accordingly, Genera requests confirmation that: (i) the FY2026 B2A process is explanatory and reconciliatory in nature; (ii) good-faith expenditures incurred under temporary and provisional budget authority will be evaluated under the authority, information, and operational circumstances existing when they were incurred; (iii) the *Final Order* will not be implemented retroactively to reclassify already-incurred FY2026 obligations solely because it later adopted a reduced or different budget structure; (iv) Genera may submit a detailed B2A narrative package with

supporting schedules; and (v) nothing in the B2A process waives LGA OMA dispositions, rights and prerogatives, nor impairs Genera’s pending reconsideration rights or right to judicial review.

## **II. Procedural Background**

As background, the Bureau had previously directed that the Fiscal Year 2025 budget, as amended, roll over as the “Temporary Default Budget” for the commencement of FY2026 until new rates were approved, and noted that permanent budget adjustments would be addressed through the rate-revision petition to be filed in Case No. NEPR-AP-2023-0003. **Resolution and Order of June 20, 2025, Establishing FY2026 Temporary Default Budgets (“Temporary Default Budget Order”)** at p. 1. Thereafter, in that same order, the Bureau set a system-wide FY2026 Temporary Default Budget of \$1,244,553,000 for Non-Federally-Funded Transmission, Distribution, and Generation expenditures, to take effect on July 1, 2025, and to “remain in force until superseded by provisional or final budgets resulting from the ongoing comprehensive rate review proceeding in Docket No. NEPR-AP-2023-0003.” ***Temporary Default Budget Order*** at p. 2.

Within that framework, the Bureau established a GenCo operating budget of \$280,393 million for FY2026, which expressly included dedicated allocations for Labor Operating Expenses, Necessary Maintenance Expenses (“NME”), a Generation Maintenance Reserve, and Shared Services. ***Temporary Default Budget Order, Attachment C***. The Temporary Default Budget Order further provided that “any deviation from the approved temporary budgets SHALL require approval from the Energy Bureau,” and clarified that the order did not constitute a permanent modification of previously approved budgets or rates and was not a predetermination regarding final rate-case outcomes. ***Temporary Default Budget Order*** at p. 2–3.

The Bureau expressly adopted these temporary measures “precisely to maintain operational continuity pending the completion of the critical Rate Review proceeding.” *Temporary Default Budget Order* at p. 2. FY2026 commenced on July 1, 2025, and Genera thereafter operated the Legacy Generation Assets under the Temporary Default Budget and, subsequently, under the provisional budget authority recognized by the Bureau pending the Rate Case. The *Final Order* itself reflects that provisional budget authority was in effect during FY2026. *See Final Order, Chapter Four* (describing the Provisional Budget approved by the Bureau).

On **April 15, 2026**, after approximately ten months of FY2026 had elapsed, the Bureau issued the *Final Order* in **NEPR-AP-2023-0003**, establishing the approved rate structure and the permanent FY2026 budget treatment, together with projected FY2027 and FY2028 treatment. On **April 29, 2026**, Genera timely moved for reconsideration of the *Final Order*. On **May 18, 2026**, the Bureau issued a Resolution and Order in **NEPR-AP-2023-0003** stating that, “[a]fter an initial review, the Energy Bureau TAKES UNDER ADVISEMENT the Motions for Reconsideration,” and directing that no additional filings be received in connection with the motions for reconsideration unless otherwise authorized by the Bureau. *Resolution and Order dated May 18, 2026, at p. 2.*

The substantive merits of the *Final Order* are therefore presently pending before the Bureau. The practical consequence of the foregoing sequence is that Genera operated FY2026 under one budgetary framework and now confronts a different, reduced framework adopted near the close of the fiscal year, giving rise to the implementation questions presented in this Motion.

### **III. Purpose of the Motion: Implementation Clarification**

Genera respectfully submits that the issue presented here is not whether the *Final Order* should be reconsidered. That issue remains pending in the Rate Case, **NEPR-AP-2023-0003**, and

Genera does not seek to relitigate it in this docket. The issue presented here is how FY2026 expenditures, commitments, and variances should be treated for B2A and budget-implementation purposes, where those expenditures and commitments were incurred in good faith under PREB-approved temporary or provisional budget authority before the *Final Order* was issued. The Budget Docket is the appropriate forum for that implementation question, just as the Rate Case remains the forum for substantive challenges to the *Final Order*.

This distinction is consequential and is reinforced by the Bureau's own procedural posture. Because the Bureau has taken the motions for reconsideration under advisement and has directed that no further filings be made in the Rate Case absent authorization, ***Resolution and Order dated May 18, 2026, at p. 2***, the appropriate and orderly course is to address FY2026 budget-implementation and reconciliation mechanics in this Budget Docket. Genera therefore does not, and does not intend to, reargue the merits of the *Final Order* here. It seeks only to prevent the implementation of the *Final Order* in a manner that would unfairly or retroactively penalize operational and financial decisions that Genera was required to make, and did make, before the *Final Order* was issued.

#### **IV. Genera's Good-Faith Reliance on PREB-Approved Temporary and Provisional Budget Authority**

Genera is the operator of the Legacy Generation Assets and is contractually obligated under the LGA OMA to maintain continuity of generation operations. The Bureau adopted the Temporary Default Budget for the express purpose of maintaining operational continuity while the Rate Case remained pending, and it directed that the budget remain in force until superseded by provisional or final budgets. **Temporary Default Budget Order at p. 2**. The temporary and provisional budget framework was not advisory; it constituted the operative spending authority

under which Genera was required to operate the fleet, and it expressly contemplated that deviations would require Bureau approval. **Temporary Default Budget Order at 2.**

Operating under that authority, Genera necessarily made real-world decisions throughout FY2026. It awarded and amended contracts, issued purchase orders, procured materials and spare parts, scheduled and executed maintenance, mobilized vendors, supported forced-outage and emergency response, and continued work necessary to preserve reliability of an aging fleet operating under conditions the Bureau itself has characterized as a generation emergency. Those decisions were made in reliance on the budgetary framework then in effect, and they cannot fairly be evaluated as though Genera had known, when it acted in July 2025 and in the months thereafter, the budget structure the Bureau would ultimately adopt in April 2026.

The reasonableness of those actions must be assessed by reference to the authority and information available when they were taken, not by hindsight reference to a later determination. Genera's Finance team is preparing a Budget-to-Actual calculation comparing FY2026 actuals against both the budget approved in June 2025 and the FY2026 budget approved in April 2026. That comparison will provide the appropriate factual basis for evaluating the resulting variances by category, timing, and context before any adverse regulatory consequence is considered.

Genera's conduct during this period reflects diligence and good faith, not disregard of the Bureau's directives. Genera has acted promptly and responsibly to develop the factual record necessary for an orderly reconciliation: it has reconciled approximately ninety-six percent (96%) of the federal funded projects for the FY2026 budget-to-actual data within the applicable sixty-day (60) period, and it has begun executing priority projects using a Working Capital Advance, without drawing on ratepayer funds, so that reliability-critical work could proceed while federal and other non-ratepayer funding pathways are pursued. This record of timely reconciliation and

ratepayer-protective execution confirms that FY2026 variances, where they exist, are the product of a transitional budget environment, operational necessity, and the timing of the *Final Order*, not of imprudence or noncompliance by Genera.

**V. The *Final Order* Was Issued After Most of FY2026 Had Elapsed and Cannot Practically Be Implemented Retroactively Without Regulatory Harm**

By **April 15, 2026**, approximately ten months of FY2026 had elapsed a *Final Order* was issued. As a practical matter, operational and financial commitments for the fiscal year had already been made: expenses had been incurred, paid, or contractually committed; purchase orders had been issued and materials ordered or received; vendors had mobilized; and maintenance work had been completed or was underway. A determination that retroactively reclassifies those Bureau-authorized expenditures as unauthorized or imprudent would create regulatory uncertainty, potential vendor and supplier disputes, operational disruption, and unfairness, all without any corresponding benefit to ratepayers or to system reliability. Indeed, retroactive defunding of obligations already incurred could force Genera to suspend or terminate ongoing work and contractual commitments, exposing Genera and PREPA to claims by vendors and suppliers, the very consequence that orderly, prospective implementation is designed to avoid.

Genera does not ask the Bureau to revisit, modify, or stay the *Final Order* in this docket as those matters remain pending in the Rate Case. It asks the Bureau to implement it in a manner that respects timing, reliance, and operational reality, and that preserves the established distinction between prospective budget control, an appropriate and expected feature of ratemaking, and the retroactive reclassification of good-faith obligations incurred under prior Bureau-approved authority. The latter is neither sound regulatory practice nor consistent with the reliance invited by the Bureau's own temporary and provisional framework. To the extent the *Final Order* adopts reduced funding levels for FY2026 and beyond, those reductions can and should be implemented

prospectively, with due regard for obligations already incurred under prior Bureau-approved authority and should not be used retroactively to reclassify those obligations solely because the *Final Order* later adopted a reduced or different budget structure.

**VI. The FY2026 B2A Process Should Reconcile Actuals Against the Authority and Circumstances Existing When Obligations Were Incurred**

Genera supports a transparent B2A process and will account for FY2026 expenditures through the appropriate reconciliation mechanism. The B2A process should serve to identify, document, explain, and reconcile variances between approved budget authority and actual results. In doing so, the Bureau should confirm that a variance, standing alone, does not determine whether an expenditure was imprudent, unauthorized, disallowable, or inconsistent with a Bureau order. That determination, if ever required, must be made in context and based on the authority, information, operational circumstances, and timing that existed when the obligation was incurred.

FY2026 variances may reflect any number of legitimate causes, including the timing of the *Final Order* itself, reliance on prior Bureau-approved authority, contractual commitments, operational necessity, forced-outage and emergency response, procurement and vendor timing, federal-funding timing, or obligations arising under the LGA OMA. The Bureau should evaluate such variances by category and context and should afford Genera notice and an opportunity to explain through the B2A narrative package and supporting schedules before any adverse regulatory conclusion is drawn from the existence of a variance.

This approach is consistent with the Bureau's own recognition that the FY2026 budget environment was constrained and transitional, and that the temporary framework was adopted to preserve operational continuity pending the Rate Case. *Temporary Default Budget Order* at p. 2. It is also consistent with the *Final Order*'s provisions protecting ratepayers against double recovery: if any project included in the approved base-rate revenue requirement subsequently

receives federal reimbursement or grant funding, the full amount of that federal funding must be credited to customers on a dollar-for-dollar basis. *See Final Order, Chapter Four, at p. 58.* A B2A process that documents, explains, and reconciles variances before attaching regulatory significance to them best serves the shared interests of transparency, ratepayer protection against double recovery, and continued system reliability. Genera also preserves its rights under the LGA OMA and the right to seek any prospective relief otherwise available under Act 57-2014, including temporary relief under Section 6.25(d), 22 L.P.R.A. § 1054x(d), should funding timing create operational, contractual, or reliability risks.

#### **VII. Good-Faith Expenditures Should Not Be Treated as Unauthorized, Imprudent, Negligent, or Sanctionable Solely Because of Later Final Budget Treatment**

As established above, Genera incurred FY2026 obligations in compliance with, and in reasonable reliance on, the Bureau's temporary and provisional budget authority. A later budget determination should not retroactively redefine that prior good-faith conduct as noncompliance, imprudence, or negligence, and should not serve as the basis for fines, penalties, adverse inferences, claw backs, or findings of noncompliance. Genera respectfully requests that the Bureau confirm that any review of FY2026 actuals will consider the timing of the *Final Order*, the prior Bureau approvals in effect when obligations were incurred, Genera's reliance, operational necessity, and the existence of unavoidable contractual commitments.

Several FY2026 categories warrant particular attention in this regard, because they were funded under the Temporary Default Budget and are contractual or reliability-critical in nature, including the Generation Maintenance Reserve, Auxiliary Equipment, and NME funded under the Temporary Default Budget, *Temporary Default Budget Order, Attachment C*, as well as the LGA OMA Reserve Account, BESS operations-and-maintenance and long-term service agreement obligations, the communications budget, and forced-outage and emergency-response work.

To the extent the *Final Order* adjusts the funding of such categories on a going-forward basis, the Bureau should recognize that obligations already incurred under those categories during FY2026 could not simply be suspended retroactively without consequences to reliability and contractual compliance and should confirm that prior good-faith reliance will not be treated as a violation. Genera makes this observation solely to frame the B2A and implementation analysis; it does not seek, in this docket, any merits determination on the funding levels for those categories, which remain the subject of Genera's pending reconsideration under the Rate Case.

Several of these categories warrant particular emphasis because they are not discretionary add-ons. First, the LGA OMA Reserve Account is a contractually required liquidity mechanism. Section 7.6(d) of the LGA OMA establishes a Reserve Account funded at US\$30 million and available for costs connected with Forced Outages, Force Majeure Events, Owner Fault, approved Capital Spare Parts, and certain funding shortfalls. Genera has also explained in its pending reconsideration motion that failure to fund or replenish Service Accounts, including the Reserve Account, may trigger significant contractual consequences under the LGA OMA. The requested US\$30 million replenishment is therefore not merely a discretionary reserve or accounting preference; it is the contractually contemplated liquidity mechanism needed to ensure that Genera can respond promptly to system-level forced outages, emergency conditions, and other reliability-critical contingencies. Absent prompt replenishment of the Reserve Account and adequate funding, Puerto Rico's energy system faces a material and unacceptable reliability risk. As a direct consequence of the determinations made in the Rate Case, Genera lacks the necessary funds to respond to forced outages—particularly at the onset of the high-demand season—thereby jeopardizing timely operational response and system stability.

The Generation Maintenance Reserve likewise serves a reliability-critical function. It supports plant-maintenance services, emergency corrective repairs, availability support, and other work necessary to sustain unit availability and reduce forced-outage duration. Without adequate funding of the Generation Maintenance Reserve, Genera lacks the necessary budgetary authority to perform essential, day-to-day operational functions, including ordinary waste management, pest control, vegetation management, elevators repairs and routine cleaning of restrooms and administrative areas. The absence of these basic allocations directly impairs Genera's ability to maintain safe, compliant, and reliable generation-facility conditions.

The communications function also is not duplicative of LUMA's separate transmission-and-distribution communications role. Genera's communications responsibilities, established and required under Annex IV, Section III (B) & (C) of the LGA OMA, are tied to its role as operator of the Legacy Generation Assets and to the operational, regulatory, emergency-response, and public-facing communications required in connection with generation operations.

The reliability stakes associated with Rate Case determinations over these categories are not abstract. Absent an adequately funded Reserve Account and maintenance-reserve liquidity, Genera lacks the rapid-response funding necessary to address forced outages on an aging thermal fleet operating under emergency conditions, materially increasing the risk of extended forced outages, load shedding, and broader system-wide reliability events. Genera incurred FY2026 obligations within these categories in reliance on the Temporary Default Budget, which expressly funded the Generation Maintenance Reserve and NME. *See Temporary Default Budget Order, Attachment C.*

#### **VIII. Federal-Funding Eligibility Does Not Retroactively Supply Cash, Liquidity, or Executable Budget Authority**

For B2A and implementation purposes, the Bureau should not treat potential federal-funding pathways as though they retroactively supplied cash, obligated funding, procurement authority, or executable liquidity during FY2026. The relevant question for B2A purposes is not merely whether an expenditure may theoretically fall within a federal-funding pathway, but whether non-ratepayer funds were actually obligated, available, liquid, and usable at the time Genera was required to act.

The *Final Order* itself recognizes this practical reality in adjacent respects. In its “Protection against double recovery” discussion, the Bureau provides that if any project included in the approved base-rate revenue requirement subsequently receives federal reimbursement or grant funding, the full amount of that federal funding shall be credited to customers, and ratepayers are entitled to a dollar-for-dollar credit. ***Final Order, Chapter Four, at p. 58.*** The *Final Order* also recognizes, in its discussion of possible rate adjustments for excluded projects, that execution of projects excluded from base rates under Categories One and Two may require working capital before federal funds arrive. ***Final Order, Chapter Four, at p. 58.***

The availability of a federal-funding pathway is not the same as the availability of usable funds, and the Bureau should not treat the two as equivalent for B2A purposes. Federal funds are not unrestricted. As a threshold matter, ordinary maintenance and operating activities—the recurring O&M work necessary to keep the Legacy Generation Assets available and running—are generally not eligible for FEMA funding, which is directed principally at eligible disaster-related repair and capital work rather than routine operation and maintenance. Treating such ordinary maintenance and operating costs as though a federal pathway covered them would leave reliability-critical work unfunded in practice and put the energy system at risk.

Even where federal funding is potentially available, obtaining an actual obligation or award is a protracted process. In many cases, securing the obligation or award of federal funds takes between six (6) and twelve (12) months, and that timeframe assumes that the funds are in fact available. Until funds are obligated and disbursed, they cannot be treated as cash, liquidity, or executable budget authority for work that must be performed in the interim.

These timing realities may be further aggravated by federal-level budget and staffing constraints affecting FEMA's processing capacity. For B2A and implementation purposes, the Bureau should account for these eligibility, liquidity, and timing realities, and should not treat the theoretical existence of a federal-funding pathway as if it supplied obligated, liquid, and executable funds during FY2026. Moreover, in many instances, work already completed, or even work previously contracted, will not qualify for federal funding eligibility.

#### **IX. Request for Authorization to Submit a Detailed B2A Narrative Package**

To facilitate a transparent and orderly reconciliation, Genera respectfully requests authorization to submit a detailed B2A narrative package and supporting schedules. The package will compare, by major category and line item, the FY2026 Temporary Default Budget, the provisional budget authority in effect during FY2026, and the FY2026 budget treatment adopted in the *Final Order*, against actual expenditures, committed obligations, and incurred-but-unpaid obligations.

For each material variance, the package will identify the original approved or provisional amount, the *Final Order* amount, actual paid amounts, incurred-but-unpaid amounts, and committed-but-unpaid amounts, together with a narrative explanation of the cause of the variance and an indication whether the item was avoidable or unavoidable after April 15, 2026, and whether it was tied to the LGA OMA, emergency or forced-outage response, maintenance, procurement or

vendor timing, federal-funding timing, or service-account or liquidity considerations. Where appropriate, Genera will support the package with declarations from Finance and Operations. Genera respectfully requests that the Bureau evaluate these explanations, and permit reasonable follow-up information requests, before making any adverse finding or imposing any compliance consequence with respect to FY2026 actuals.

#### **X. Preservation of Rights**

Nothing in this Motion, and nothing in the FY2026 budget-to-actual process, waives, limits, or impairs any of Genera's rights or of the LGA OMA dispositions. Genera does not waive the arguments raised in its Motion for Reconsideration dated **April 29, 2026**, which remains pending before the Bureau in NEPR-AP-2023-0003. *See Resolution and Order dated May 18, 2026, at p. 2.* Genera does not waive any of its rights under the LGA OMA, nor does it waive its right to seek judicial review of the Final Order. Genera does not concede that any reduction adopted in the *Final Order* was lawful, supported by substantial evidence, or correctly applied, and does not concede that any FY2026 variance is unauthorized, imprudent, negligent, or disallowable.

Genera submits this Motion to place before the Bureau, in this Budget Docket, the FY2026 budget-to-actual, liquidity, federal-funding, contractual, and reliability-related implementation issues described herein. These matters arise from good-faith FY2026 expenditures and commitments incurred under prior Bureau-approved temporary or provisional budget authority, and from the practical consequences of implementing the **April 15, 2026 Final Order** after most of FY2026 had elapsed. Genera submits these matters as part of the record and as a measure to preserve its rights regarding FY2026 budget-to-actual reconciliation, implementation of the Final Order, and any future regulatory treatment of FY2026 expenditures, commitments, variances,

service-account issues, liquidity constraints, federal-funding timing, and reliability-critical obligations.

This filing is not intended to constitute a request for reconsideration of the *Final Order* in this Budget Docket. Genera reserves all rights under the LGA OMA, applicable law, and the Bureau's regulations, including the right to seek additional or prospective relief, such as a budget amendment or reconciliation adjustment, should implementation of the *Final Order* create operational, contractual, liquidity, or reliability risks.

### **XI. Relief Requested**

WHEREFORE, **Genera PR LLC** respectfully requests that the Puerto Rico Energy Bureau:

1. Clarify, for FY2026 budget-to-actual reconciliation and implementation purposes, that the existence of a variance between FY2026 actual expenditures or commitments and the budget levels adopted in the April 15, 2026 *Final Order* shall not, standing alone, constitute a basis for fines, penalties, clawbacks, adverse inferences, findings of imprudence or negligence, or findings of noncompliance, and that Genera shall be afforded notice and an opportunity to explain the authority, timing, operational circumstances, federal-funding status, liquidity constraints, and reliability considerations applicable to any material variance before any adverse regulatory consequence is imposed;

2. Grant Genera a reasonable term, fifteen (15) days, or such other period as the Bureau deems appropriate, to submit the detailed FY2026 budget-to-actual narrative package and supporting schedules being prepared by Genera's Finance team;

3. Permit Genera to supplement the record, as appropriate, with declarations from Finance, Operations, or other knowledgeable personnel addressing the factual and operational basis for the

FY2026 budget-to-actual reconciliation, including the timing of commitments, the availability or non-availability of federal funds, the use of Working Capital Advance mechanisms, and reliability-critical obligations;

4. Determine, after reviewing Genera's forthcoming FY2026 budget-to-actual narrative package and supporting schedules, whether any further procedural step is necessary or appropriate, including a technical conference, status conference, hearing, or further order; and

4. Grant such other procedural or implementation relief as the Bureau deems just and proper to ensure an orderly FY2026 budget-to-actual reconciliation, preserve Genera's rights, avoid prejudice to the pending reconsideration process, and protect system reliability pending further Bureau action.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 9<sup>th</sup> day of June, 2026.

**ECIJA SBGB**  
PO Box 363068  
San Juan, Puerto Rico 00920  
Tel. (787) 300-3200  
Fax (787) 300-3208

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo  
[jfernandez@ecija.com](mailto:jfernandez@ecija.com)  
TSPR 9,669

/s/ Ernesto R. Ramos Maldonado  
Ernesto R. Ramos Maldonado  
[eramos@ecija.com](mailto:eramos@ecija.com)  
TSPR 23,882

/s/ Gabriela Alejandra Castrodad García  
Gabriela Alejandra Castrodad García  
[gcastrodad@ecija.com](mailto:gcastrodad@ecija.com)  
TSPR 23,584

## CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System and that we will send an electronic copy of this motion to [mvalle@gmlex.net](mailto:mvalle@gmlex.net); [nzayas@gmlex.net](mailto:nzayas@gmlex.net); [rcruzfranqui@gmlex.net](mailto:rcruzfranqui@gmlex.net); [hrivera@jrsp.pr.gov](mailto:hrivera@jrsp.pr.gov); [yahaira.delarosa@us.dlapiper.com](mailto:yahaira.delarosa@us.dlapiper.com); [alexis.rivera@prepa.pr.gov](mailto:alexis.rivera@prepa.pr.gov); [alejandro.figueroara@lumapr.com](mailto:alejandro.figueroara@lumapr.com); [regulatorypreborders@lumapr.com](mailto:regulatorypreborders@lumapr.com); [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com); [jan.albinolopez@us.dlapiper.com](mailto:jan.albinolopez@us.dlapiper.com); [katiuska.bolanos-lugo@us.dlapiper.com](mailto:katiuska.bolanos-lugo@us.dlapiper.com); and [rrosas@spalawpr.com](mailto:rrosas@spalawpr.com).

In San Juan, Puerto Rico, this 9<sup>th</sup> day of June, 2026.

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo

/s/ Ernesto R. Ramos Maldonado  
Ernesto R. Ramos Maldonado

/s/ Gabriela Alejandra Castrodad García  
Gabriela Alejandra Castrodad García