

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

NEPR
Received:
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IN RE: REVIEW OF LUMA'S INITIAL BUDGETS | **CASE NO.: NEPR-MI-2021-0004**

MOTION REQUESTING EXTENSION OF TIME

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its counsel, and respectfully submits and prays as follows:

1. On April 15, 2026, the Puerto Rico Energy Bureau ("Energy Bureau") issued a Resolution and Order requiring, among other things, that:

PREPA shall file scope delineation memoranda for all engagements exceeding \$200,000 within 60 days of this order, identifying the specific matters handled, the rates charged by attorney, and the basis for any rates exceeding \$400 per hour. Each memorandum shall demonstrate that the engagement does not duplicate legal functions performed by LUMA Energy or Genera PR...

2. PREPA recognizes the importance of the information requested by the Energy Bureau and remains committed to complying fully with the Order. However, PREPA currently faces significant operational and resource constraints that have materially affected its ability to complete the required memoranda within the prescribed timeframe.

3. Specifically, the Legal Affairs Directorate presently consists of only three attorneys who are responsible for handling PREPA's regulatory matters before the Energy Bureau, as well as numerous additional legal, regulatory, contractual, and operational matters involving PREPA.

4. Furthermore, the professional services contract with the law firm González & Martínez Law Offices, P.S.C. ("G&M"), exhausted its available funding during May 2026. As a result, PREPA is not currently receiving legal support services from said firm.

5. This circumstance is particularly significant because G&M serves as PREPA's principal outside legal counsel and provides legal services in multiple regulatory, litigation, transactional, and administrative matters before federal and Commonwealth forums.

6. Consequently, since the exhaustion of those funds, the attorneys within PREPA's Legal Affairs Directorate have been required to assume responsibilities previously handled by outside counsel, resulting in a substantial increase in their workload while continuing to address PREPA's ongoing regulatory obligations before the Energy Bureau and other critical legal matters.

7. While PREPA has made every effort to prioritize compliance with the Energy Bureau's directives, the preparation of the requested scope delineation memoranda requires the collection, review, and organization of substantial information concerning legal engagements, billing rates, and the scope of services performed. Given the current staffing limitations and budgetary constraints, PREPA respectfully submits that it is not reasonably feasible to complete this undertaking within the existing deadline while simultaneously attending to PREPA's ongoing regulatory, contractual, litigation, and other legal obligations.

8. Accordingly, PREPA respectfully requests an additional forty-five (45) days to comply with the Energy Bureau's directive. The requested extension is reasonable in light of PREPA's current staffing and budgetary constraints and will allow PREPA sufficient time to prepare complete and accurate submissions responsive to the Energy Bureau's Order. PREPA further submits that this request is made in good faith, is not intended to cause delay, and will not prejudice any party.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take NOTICE of this filing and grant a forty-five (45)-day extension to file the scope delineation memoranda required by the Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the 16th day of June 2026.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login> and notified via email to the attorneys of the parties of record: jfr@sbgblaw.com, emaldonado@sbgblaw.com; gcastrodad@sbgblaw.com; jan.albinolopez@us.dlapiper.com; margarita.mercado@us.dlapiper.com; Yahaira.delarosa@us.dlapiper.com; jfernandez@ecija.com; eramos@ecija.com; and hrivera@jrsp.pr.gov.

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