

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

**NEPR**

**Received:**

**Jul 10, 2026**

**11:35 AM**

**IN RE:**

REQUEST FOR APPROVAL OF THE  
YABUCOA DECOMMISSIONING PLAN

**CASE NO.:** NEPR-MI-2026-0006

**SUBJECT:** Memorandum of Law in Support of  
Confidential Treatment of Proposed Yabucoa  
Decommissioning Plan

**MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF  
PROPOSED YABUCOA DECOMMISSIONING PLAN**

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

**COMES NOW** GENERA PR LLC (“Genera”), as agent of the Puerto Rico Electric Power Authority (“PREPA”),<sup>1</sup> through its counsels of record, and respectfully submits and prays as follows:

**I. INTRODUCTION**

1. On January 24, 2023, the Puerto Rico Electric Power Authority ("PREPA"), the Puerto Rico Public-Private Partnerships Authority ("P3A"), and Genera PR LLC ("Genera PR") entered into the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement ("LGA OMA").

2. Pursuant to the LGA OMA, Genera has the obligation to decommission or retire units that (i) are no longer operational, (ii) cannot be safely operated or maintained, or (iii) are to be replaced by newer or more efficient units.

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<sup>1</sup> Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (“LGA OMA”), dated January 24, 2023, executed by and among PREPA, the Puerto Rico Public-Private Partnerships Authority and Genera, Genera is the sole operator and administrator of the Legacy Generation Assets (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. Article 16 of the LGA OMA establishes the procedures governing the decommissioning of Legacy Generation Assets. Among other things, Article 16 authorizes P3A, as Administrator acting on behalf of PREPA as Owner, to issue a Decommissioning Notice to Genera to commence Decommissioning Services for one or more Legacy Generation Assets. Article 16 further requires Genera to prepare and submit a Decommissioning Plan to P3A and the Puerto Rico Energy Bureau ("PREB" or "Energy Bureau"), with copy to PREPA and LUMA Energy, LLC together with LUMA Energy ServCo, LLC ("LUMA"), as the T&D Operator..

4. On June 2, 2026, P3A, as Administrator acting on behalf of PREPA as Owner, issued a Decommissioning Notice to Genera pursuant to Article 16, Section 16.1(a) of the LGA OMA, for the retirement of two Legacy Generation Assets, particularly the two Frame 5 units at the Yabucoa Power Plant (the "Yabucoa Units"), and the commencement of Decommissioning Services at the Yabucoa Units.

5. Accordingly, on July 1, 2026, Genera filed its *Motion to Submit Yabucoa Decommissioning Plan Pursuant to Article 16 of the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* (the "July 1 Motion"), through which it submitted its Proposed Yabucoa Decommissioning Plan as Exhibit B to said Motion. In the same Motion, Genera requested that Exhibit B be maintained as confidential and informed the Energy Bureau that it would submit the corresponding Memorandum of Law in support of its request for confidential treatment pursuant to the Energy Bureau's Policy on Management of Confidential Information.

6. Genera hereby submits this Memorandum of Law in support of the confidential treatment of its Proposed Yabucoa Decommissioning Plan and respectfully requests that the

Energy Bureau designate the Proposed Yabucoa Decommissioning Plan as confidential and maintain it under seal for the sole purpose of its review and evaluation.

## II. IDENTIFICATION OF CONFIDENTIAL INFORMATION

| Document Name and File Date                                                                                                                                                                                                                        | Pages in which Confidential Information is Found, if applicable | Summary of Legal Basis for Confidential Designation, if applicable                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Summary of why each claim or designation conforms to the applicable legal basis for confidentiality                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Exhibit B to the <i>Motion to Submit Yabucoa Decommissioning Plan Pursuant to Article 16 of the Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement</i> filed on July 1, 2026 (“Proposed Yabucoa Decommissioning Plan”). | Whole document                                                  | <p>(1) Sensitive commercial information and trade secrets under Act 80-2011, present during an ongoing competitive procurement process, that have not yet been finalized and remain subject to revision.</p> <p>(2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, contained substantially throughout the Proposed Yabucoa Decommissioning Plan; Critical Energy Infrastructure Information under 18 C.F.R. § 388.113(c)(2), contained substantially throughout the Proposed Yabucoa Decommissioning Plan.</p> | <p>The Proposed Yabucoa Decommissioning Plan contains information that is not yet finalized and remains subject to significant revisions. The need for further modification primarily justifies the confidential treatment of the Plan. Moreover, it includes sensitive commercial information and trade secrets as defined under Act No. 80-2011, and it is part of an ongoing competitive procurement process. Protecting this information from premature disclosure is necessary, given its dependence on feedback from the Energy Bureau.</p> <p>The importance of maintaining the confidentiality of sensitive infrastructure information is to prevent its exploitation or misuse by individuals with harmful intentions, thereby protecting critical energy infrastructure and the orderly implementation of the</p> |

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|  |  |  | <p>proposed decommissioning activities.</p> <p>Maintaining the confidentiality of sensitive Critical Energy Infrastructure Information is necessary for the orderly, effective, and timely implementation of the decommissioning activities and for the protection of Puerto Rico's critical energy infrastructure.</p> |
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### III. MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF GENERA'S PROPOSED YABUCOA DECOMMISSIONING PLAN

#### A. Applicable Law

The governing statute for the management of classified information submitted to the Energy Bureau is Section 6.15 of Act No. 57-2014, also known as the “Puerto Rico Energy Transformation and RELIEF Act.” This section stipulates that “[i]f any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted carries a confidentiality privilege, such person may request the [Bureau] to treat such information as confidential...” 22 L.P.R.A. § 1054n. If, after conducting a meticulous evaluation, the Energy Bureau determines that the information warrants protection, it is required to “grant such protection in a manner that **minimally** affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the allegedly confidential document is submitted.” *Id.* at Section 6.15(a).

Consequently, such information must be withheld from the public domain by the Energy Bureau and “must be duly safeguarded and provided exclusively to the personnel of the Energy [Bureau] who need to know such information under nondisclosure agreements.” *Id.* at Section 6.15(c). Access to the confidential information shall be provided “only to the lawyers and external

consultants involved in the administrative process after the execution of a confidentiality agreement.” *Id.* Section 6.15(b), 22 LPRA § 1054n. Therefore, “[t]he Energy [Bureau] must swiftly act on any privilege and confidentiality claim made by a person under its jurisdiction through a resolution for such purposes before any potentially confidential information is disclosed.” *Id.* at Section 6.15(d). Act 57-2014 provides that this Energy Bureau “shall keep the documents submitted for its consideration out of public reach only in exceptional cases. In these cases, the information shall be duly safeguarded and delivered exclusively to the personnel of the [Energy Bureau] who need to know such information under nondisclosure agreements. However, the [Energy Bureau] shall direct a non-confidential copy be furnished for public review.” *Id.* Section 6.15(c).

Additionally, the Energy Bureau’s Policy on Management of Confidential Information details the procedures a party should follow to request confidential treatment for a document or a portion of it. Said Policy requires identifying confidential information and filing a memorandum of law explaining the legal basis and support for a request to file information confidentially. See Section A of the Energy Bureau’s Policy on Management of Confidential Information. The memorandum should also include a table that identifies the confidential information, a summary of the legal basis for the confidential designation, and an explanation of why each claim or designation conforms to the applicable legal basis for confidentiality. *Id.* The party seeking confidential treatment of information filed with the Energy Bureau must also file both a "redacted" (or "public") version and an "unredacted" (or "confidential") version of the document that contains the confidential information. *Id.* With respect to access to validated Critical Energy Infrastructure Information (the “CEII”), the Policy further provides that the information designated by the Energy Bureau as Validated Confidential Information on the grounds of being CEII may be accessed by

the parties' authorized representatives only after they have executed and delivered the Non-Disclosure Agreement. Those authorized representatives who have signed the Non-Disclosure Agreement may only review the documents validated as CEII at the Energy Bureau or the Producing Party's offices. During said review, the authorized representatives may not copy or disseminate the reviewed information and may not bring any recording device to the viewing room. *Id.*, Section D(2).

In conjunction with the aforementioned, Energy Bureau Regulation 8815, also known as the *Joint Regulation for the Procurement, Evaluation, Selection, Negotiation, and Award of Contracts for the Purchase of Energy and for the Procurement, Evaluation, Selection, Negotiation, and Award Process for the Modernization of the Generation Fleet and other Resources* ("Regulation 8815"), provides clear and explicit safeguards for confidential information during competitive bidding procedures, as delineated in Article 4.2.

In its pertinent part, Article 4.2 of Regulation 8815 mandates that "[p]rior to launching any public procurement process, and after receiving the approval of the Board [from PREPA] to proceed with the proposed Project and procurement process, the Executive Director [of PREPA] will notify in writing to the Energy [Bureau] the recommendation of the Project Committee with respect to: (i) the proposed Project, including all associated documents that explain the Project; (ii) the proposed parameters to determine such profit margin and price escalators; (iii) consistency with the IRP approved by the Energy [Bureau]; and (iv) compliance with this Regulation, the Acts, and other laws and regulations related to procurement processes." Importantly, Article 4.2 further provides that the communications and processes should remain confidential while the administrative competitive procurement process is ongoing.

In addition to the aforementioned, it is worth noting that under Act No. 80-2011, also known as the Industrial and Trade Secret Protection Act of Puerto Rico ("Act No. 80-2011"), certain information may be granted protection as a trade secret. Specifically, Act No. 80-2011 provides that industrial or trade secrets are deemed to be any information:

- a. That has a present or potential independent financial value or that provides a business advantage, insofar as such information is not common knowledge or readily accessible through proper means by persons who could make a monetary profit from the use or disclosure of such information, and
- b. For which reasonable security measures have been taken, as circumstances dictate, to maintain its confidentiality.

Moreover, in the context of Act No. 80-2011, information refers to knowledge that amplifies or clarifies existing understanding, including but not limited to formulas, compilations, methods, techniques, processes, recipes, designs, treatments, models, or patterns. See Article 3 of Act No. 80-2011. In addition, Puerto Rico's Supreme Court has delineated a trade secret as any process of manufacturing, treating, or preserving materials, a formula or recipe, a blueprint or pattern for the development of machinery, or even a list of specialized customers that constitute a distinct market, thereby bestowing a competitive advantage upon its owner. See *Ponce Adv. Med. v. Santiago González*, 197 DPR 891, 903-904 (2007).

Relatedly, Energy Bureau Regulation 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation proceedings*, includes a provision for filing confidential information in adjudicatory proceedings before this honorable Energy Bureau. To wit, Section 1.15 provides that, "a person has the duty to disclose information to the [Energy Bureau] considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the [Energy Bureau] the protection and said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The [Energy Bureau] shall evaluate the petition, and if it understands [that] the material merits

protection, proceed according to what is set forth in Article 6.15 of Act No. 57-2014, as amended.”

Section 1.15, Confidential Information, Energy Bureau Regulation 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review, and Investigation proceedings*.

In addition to the above, Genera's Proposed Yabucoa Decommissioning Plan encompasses Critical Energy Infrastructure Information (“CEII”). Federal statutes define CEII as:

[S]pecific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act (“FOIA”), 5 U.S.C. 552; and (iv) does not simply reveal the general location of the critical infrastructure.”

18 CFR 388.113(c)(2).

Furthermore, “critical electric infrastructure” is defined as “a system or asset of the bulk-power system, whether physical or virtual, the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or any combination of those matters.” *Id.* §388.11(c)(4). As indicated, CEII is exempt from FOIA disclosure and must not be “made available by any Federal, State, political subdivision, or tribal authority under any Federal, State, political subdivision, or tribal law mandating public disclosure of information or records.” *Id.* §388.113(c)(1). The FOIA exemption most directly applicable to CEII is Exemption 3, which protects information withheld pursuant to a statute that establishes particular criteria for withholding. Both the Critical Infrastructure Information Act of 2002 and FERC's CEII regulations under 18 CFR § 388.113 constitute such statutes, independently establishing the criteria under which this category of information must be withheld from public disclosure.

The *Critical Infrastructure Information Act of 2002*, 6 U.S.C. §§ 671-674 (“CII Act”), a component of the Homeland Security Act of 2002, provides additional protection to critical

infrastructure information (“CII”)<sup>2</sup>, which is defined by statute as “information not customarily in the public domain and related to the security of critical infrastructure or protected systems.” *See*, 6 U.S.C. § 650 (4)<sup>3</sup>. With regards to the disclosure of such information, the Act specifies: “Notwithstanding any other provision of law, critical infrastructure information (including the identity of the submitting person or entity) voluntarily submitted to a covered federal agency for its use regarding the security of critical infrastructure and protected systems [...] (A) shall be exempt from disclosure under ... the Freedom of Information Act[ ]” and “(E) shall not, if provided to a state or local government or government agency, ... [ ] ... be made available pursuant to any state or local law requiring disclosure of information or records[.]” *Id.*, § 673(a)(1)(A) & (E).

Likewise, Act No. 40-2024, better known as the *Commonwealth of Puerto Rico Cybersecurity Act*, defines “Critical Infrastructure” (“Act 40-2024”) as those “services, systems,

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<sup>2</sup> Regarding protection of voluntary disclosures of critical infrastructure information, the CII Act state, in its pertinent part, that CII:

- (A) shall be exempt from disclosure under section 552 of title 5 (commonly referred to as the Freedom of Information Act);
- (B) shall not be subject to any agency rules or judicial doctrine regarding *ex parte* communications with a decision making official;
- (C) shall not, without the written consent of the person or entity submitting such information, be used directly by such agency, any other Federal, State, or local authority, or any third party, in any civil action arising under Federal or State law if such information is submitted in good faith;
- (D) shall not, without the written consent of the person or entity submitting such information, be used or disclosed by any officer or employee of the United States for purposes other than the purposes of this part, except—
  - (i) in furtherance of an investigation or the prosecution of a criminal act; or
  - (ii) when disclosure of the information would be—
    - (I) to either House of Congress, or to the extent of matter within its jurisdiction, any committee or subcommittee thereof, any joint committee thereof or subcommittee of any such joint committee; or
    - (II) to the Comptroller General, or any authorized representative of the Comptroller General, in the course of the performance of the duties of the Government Accountability Office.
- (E) shall not, if provided to a State or local government or government agency—
  - (i) be made available pursuant to any State or local law requiring disclosure of information or records;
  - (ii) otherwise be disclosed or distributed to any party by said State or local government or government agency without the written consent of the person or entity submitting such information; or
  - (iii) be used other than for the purpose of protecting critical infrastructure or protected systems, or in furtherance of an investigation or the prosecution of a criminal act; and
- (F) does not constitute a waiver of any applicable privilege or protection provided under law, such as trade secret protection.

<sup>3</sup> The term “critical infrastructure information” means information not customarily in the public domain and related to the security of critical infrastructure or protected systems—

- (A) Actual, potential, or threatened interference with, attack on, compromise of, or incapacitation of critical infrastructure or protected systems by either physical or computer-based attack or other similar conduct (including the misuse of or unauthorized access to all types of communications and data transmission systems) that violates Federal, State, or local law, harms interstate commerce of the United States, or threatens public health or safety;
- (B) The ability of any critical infrastructure or protected system to resist such interference, compromise, or incapacitation, including any planned or past assessment, projection, or estimate of the vulnerability of critical infrastructure or a protected system, including security testing, risk evaluation thereto, risk management planning, or risk audit; or
- (C) Any planned or past operational problem or solution regarding critical infrastructure or protected systems, including repair, recovery, reconstruction, insurance, or continuity, to the extent it is related to such interference, compromise, or incapacitation.

resources, and essential assets, whether physical or virtual, the incapacity or destruction of which would have a debilitating impact on Puerto Rico's cybersecurity, health, economy, or any combination thereof." 3 LPRA § 10124p. With regards to Act 40-2024's applicability to Genera, as Operator of the O&M Services for the Legacy Generation Assets, said statute provides the following:

The provision of this chapter shall apply to the Executive Branch including all departments, boards, instrumentalities, commissions, bureaus, offices, agencies, administrations or bodies, political subdivisions public corporations, and municipalities. It shall likewise apply to every natural or juridical person, doing business or having contracts with the government including, but not limited to, private persons performing public services and duties, but only with respect to the public services and duties being performed; any public or private administration exercise in which public resources or funds were committed or invested (directly or indirectly), or in which any public servant exercised his authority with regards to the data collected as a result of such activities.

3 LPRA § 10122

## **B. Ground for Confidentiality**

The Proposed Yabucoa Decommissioning Plan, submitted as Exhibit B to the July 1 Motion, contains sensitive information that is inherently dynamic and provisional. The information detailed within the Proposed Yabucoa Decommissioning Plan is not yet final and remains subject to comprehensive review and possible alteration by the Energy Bureau. As a work in progress, the Proposed Yabucoa Decommissioning Plan reflects current strategies and plans that are contingent upon further evaluation and modification by the Energy Bureau. Such changes could significantly alter its content and directives. Public disclosure at this stage could lead to misunderstandings and misrepresentations about the proposed decommissioning strategy, underscoring the need for confidentiality.

Further compounding the need for confidentiality, the Proposed Yabucoa Decommissioning Plan includes details that are critical to the development of an ongoing public

procurement process still under consideration by the Energy Bureau. Such fluidity necessitates that the Proposed Yabucoa Decommissioning Plan remain confidential in accordance with Article 4.2 of Regulation 8815. Disclosing the information contained in the Proposed Yabucoa Decommissioning Plan at this juncture would not only contravene Regulation 8815 but also threaten the transparency and integrity of the ongoing procurement process, thereby undermining Genera's position as the issuing authority.

Additionally, the Proposed Yabucoa Decommissioning Plan is derived from an in-depth proprietary analysis that incorporates a comprehensive understanding of the proposed decommissioning activities and leverages insights from past experiences. This analysis encompasses methodologies that are not commonly accessible to the public or competitors in the energy sector. Given the considerable financial value of this proprietary information, it is eligible for trade secret protection under Act No. 80-2011. As such, the information within the Proposed Yabucoa Decommissioning Plan justifies classification as a trade secret and warrants the fullest extent of legal protection afforded by both Act No. 80-2011 and the regulations of the Energy Bureau.

Moreover, the Proposed Yabucoa Decommissioning Plan contains Critical Energy Infrastructure Information ("CEII") and Critical Infrastructure Information ("CII") throughout. Generally, CEII and CII are exempt from public disclosure because they involve assets and information that pose public security, economic, health, and safety risks.

Genera, as the sole operator of the Legacy Generation Assets under the LGA OMA, constitutes a private entity performing public services and duties pursuant to a contract with the Government of Puerto Rico within the meaning of 3 L.P.R.A. § 10122. The Proposed Yabucoa Decommissioning Plan, which details engineering analyses, demolition methodologies,

infrastructure assessments, and operational planning relating to the decommissioning of the Yabucoa Units, falls squarely within the critical infrastructure protection purposes of Act No. 40-2024. Accordingly, the information contained therein is entitled to the protection afforded by Act No. 40-2024 to the same extent as information held by the public entities with which Genera coordinates the decommissioning of the Legacy Generation Assets.

In light of the above explained applicable law, Genera respectfully submits that the Proposed Yabucoa Decommissioning Plan, submitted as Exhibit B to the July 1 Motion, is protected from disclosure due to containing CII and CEII throughout, both of which warrant confidential designation and treatment.

In essence, the Proposed Yabucoa Decommissioning Plan contains CII and CEII, the confidentiality of which is crucial to ensuring both critical infrastructure security and public safety. While recognizing the Energy Bureau's commitment to transparency and the public interest, Genera respectfully urges the Energy Bureau to consider the delicate balance between those commitments and the need for confidentiality in matters pertaining to critical infrastructure, all of which are cross-referenced, elaborated, and discussed substantially throughout the Proposed Yabucoa Decommissioning Plan submitted herein. Disclosing the classified information contained in the Proposed Yabucoa Decommissioning Plan would not only expose sensitive infrastructure details but also compromise the integrity of Puerto Rico's critical energy infrastructure.

Additionally, there is a significant risk that individuals with malicious intent could access this sensitive infrastructure information, potentially exploiting or circumventing the technical information and methodologies contained in the Proposed Yabucoa Decommissioning Plan. Such inappropriate disclosures could compromise future procurement activities, undermine the orderly implementation of the proposed decommissioning project, and create unnecessary risks to Puerto

Rico's critical energy infrastructure. Therefore, maintaining confidentiality is not only essential but wholly justified in the interests of public safety and the protection of critical infrastructure.

This honorable Energy Bureau has previously granted confidential treatment to information submitted by Genera under this same Policy framework, recognizing the legitimacy of Genera's confidentiality claims and the importance of protecting sensitive operational information from public disclosure. Consistent with that precedent, and in light of the compelling legal basis set forth herein, Genera respectfully submits that the Proposed Yabucoa Decommissioning Plan warrants the same treatment.

In light of these considerations, Genera respectfully requests that the Energy Bureau maintain the confidentiality of the Proposed Yabucoa Decommissioning Plan. This measure is essential not only as a legal necessity but also as a practical strategy to safeguard the security and effectiveness of Puerto Rico's energy infrastructure planning and operations. Maintaining the confidentiality of this document ensures that all stakeholders, including the public and potential bidders in future projects, engage with accurate and finalized information once all considerations have been duly evaluated and confirmed.

**WHEREFORE**, Genera respectfully requests that the Energy Bureau **take notice** of the above for all purposes; **grant confidential treatment** to Genera's Proposed Yabucoa Decommissioning Plan submitted as Exhibit B to the July 1 Motion pursuant to the Energy Bureau's *Policy on Management of Confidential Information*, CEPR-MI-2016-0009; and **grant** any and all other relief that the Energy Bureau deems just and proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 10<sup>th</sup> day of July of 2026.

*[Signature page follows.]*

**ECIJA SBGB**

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### **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.

In San Juan, Puerto Rico, this 10<sup>th</sup> day of July of 2026.

/s/ Jorge Fernández-Reboredo  
Jorge Fernández-Reboredo

/s/ José Javier Díaz Alonso  
José Javier Díaz Alonso

/s/ Ernesto Raúl Ramos Maldonado  
Ernesto Raúl Ramos Maldonado