

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

NEPR

Received:

Jul 30, 2026

5:21 PM

IN RE:

THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER AUTHORITY

CASE NO.: NEPR-MI-2019-0007

Subject: Memorandum of Law in Support of
Confidential Treatment of Exhibits 2B, 2D, 2I,
2J, 2K, 2L, and 2M to Genera's July 20, 2026
Motion

**MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF
EXHIBITS 2B, 2D, 2I, 2J, 2K, 2L, AND 2M TO GENERA'S JULY 20, 2026 MOTION**

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 counsels of record, and respectfully submits and prays as follows:

I. INTRODUCTION

1. On March 16, 2026, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued a Resolution and Order ("March 16th Resolution") in which it determined, *inter alia*, that, beginning with the FY2026 Q3 Report, Genera must submit its own quarterly performance metric submission separately from LUMA.²

2. 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 26 Motion"), to comply with the directives set forth in the March 16th Resolution.

¹ 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.

² LUMA Energy, LLC and LUMA Energy ServCo, LLC (jointly referred to as "LUMA").

3. On April 2, 2026, the Energy Bureau issued a Resolution and Order ("April 2 Resolution") whereby, among others, it issued a new Generation quarterly data reporting template for Genera, attached thereto as Attachment B, to be used beginning with the FY2026 Q3 submission due on or before April 20, 2026, and for all future quarterly report submissions. In its *April 2nd Resolution*, the Energy Bureau stated its intention to use this docket to collect additional information on areas of Genera's performance that have a direct impact on the incentives that Genera will receive per its LGA OMA. To that end, the Resolution's stated purposes include: (i) aligning the definition of the metrics Genera currently reports with the performance incentive metrics in the LGA OMA; (ii) adding Genera performance incentive metrics not currently being reported to the reporting template, and ordering Genera to report data for those metrics from when it took over operations until the present; and (iii) requiring Genera to submit its quarterly performance metric submission separately from LUMA for all subsequent quarterly reports, consistent with the Energy Bureau's prior determination in the *March 16th Resolution* that, beginning with the FY2026 Q3 Report, Genera must submit its own data, workpapers, and motion separately from LUMA.

4. Accordingly, and in compliance with the March 16th Resolution and the April 2nd Resolution, on July 20, 2026, Genera filed its *Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and April 2, 2026* ("July 20 Motion"). Through the July 20 Motion, Genera submitted its Q4 FY2026 Quarterly Performance Metrics Report as Exhibit 1, together with Exhibits 2A through 2M, consisting of the underlying data and supporting workpapers required by the Energy Bureau.

5. In the July 20 Motion, Genera filed Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M under seal pursuant to the Energy Bureau's Policy on Management of Confidential Information, CEPR-

MI-2016-0009, as amended ("Energy Bureau's Policy on Management of Confidential Information"), and informed the Energy Bureau that it would submit a Memorandum of Law in support of their confidential treatment.

6. Accordingly, Genera hereby submits this Memorandum of Law in support of the confidential treatment of Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M of the July 20 Motion and respectfully requests that the Energy Bureau designate said exhibits as confidential and maintain them under seal for 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 2B ("Cost of Generation Q4 FY2026") to the Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.	Whole document	(Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure.	Exhibit 2B contains proprietary cost of generation information, including plant-specific operating costs, fuel costs, internal calculations, and financial analyses that are not publicly available. Disclosure of this information would reveal confidential commercial information concerning Genera's operations and would diminish the commercial advantage derived from maintaining such information confidential.
Exhibit 2D ("Q4 Fuel Consumption, Generation, and Heat Rates") to the Motion Submitting Quarterly Report and to Comply with	Whole document	(1) Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage	Exhibit 2D contains detailed operational information regarding fuel consumption, generation output, heat rates, and unit performance for Genera's generating facilities. The information reflects

Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.		because such information is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure. (2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, and 18 C.F.R. § 388.113(c)(2), contained substantially throughout the exhibit.	proprietary operational analyses and technical performance data that are not publicly available. Public disclosure could reveal sensitive operational characteristics of Puerto Rico's thermal generation facilities and compromise information relating to critical energy infrastructure.
Exhibit 2I ("Decommissioning Cost Efficiency Data") to the Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.	Whole document	Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure.	Exhibit 2I contains proprietary decommissioning cost analyses, budget information, project tracking data, internal work descriptions, employee and supplier billing information, hourly rates, cost allocations, and other non-public business records. Disclosure of this information would reveal confidential commercial and operational information that provides Genera with a commercial advantage by remaining confidential.
Exhibit 2J ("Fuel Consumption and Emissions Calculations – April 2026") to the Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and	Whole document	(1) Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information is not common knowledge or accessible by proper means by persons who could obtain an economic	Exhibit 2J contains detailed fuel consumption, emissions calculations, generation data, operational formulas, and supporting technical analyses relating to specific generating units. The information reflects proprietary operational methodologies and technical data concerning Puerto Rico's thermal generation facilities.

April 2, 2026, filed on July 20, 2026.		benefit from its use or disclosure. (2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, and 18 C.F.R. § 388.113(c)(2), contained substantially throughout the exhibit.	Disclosure could reveal sensitive operational characteristics of critical energy infrastructure while also compromising commercially valuable operational information.
Exhibit 2K ("Fuel Consumption and Emissions Calculations – May 2026") to the Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.	Whole document	(1) Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure. (2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, and 18 C.F.R. § 388.113(c)(2), contained substantially throughout the exhibit.	Exhibit 2K contains the same categories of proprietary operational information, emissions calculations, fuel consumption data, and technical analyses for May 2026. Public disclosure would reveal confidential operational information regarding Genera's generating fleet and sensitive information relating to critical energy infrastructure.
Exhibit 2L ("Fuel Consumption and Emissions Calculations – June 2026") to the Motion Submitting Quarterly Report and to Comply with	Whole document	(1) Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information	Exhibit 2L contains the same categories of proprietary operational information, emissions calculations, fuel consumption data, and technical analyses for June 2026. Disclosure could reveal confidential operational

Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.		is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure. (2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, and 18 C.F.R. § 388.113(c)(2), contained substantially throughout the exhibit.	information and technical characteristics relating to Puerto Rico's critical energy infrastructure.
Exhibit 2M ("Fuel Consumption and Emissions Calculations Q4 FY2026 Summary") to the Motion Submitting Quarterly Report and to Comply with Resolution and Orders Issued on March 16, 2026, and April 2, 2026, filed on July 20, 2026.	Whole document	(1) Sensitive commercial information and trade secrets under Act No. 80-2011 that derive independent economic value and provide a commercial advantage because such information is not common knowledge or accessible by proper means by persons who could obtain an economic benefit from its use or disclosure. (2) Critical Energy Infrastructure Information under Section D(2) of the Policy on Management of Confidential Information, CEPR-MI-2016-0009, as amended, and 18 C.F.R. § 388.113(c)(2), contained substantially throughout the exhibit.	Exhibit 2M consolidates detailed fuel consumption, generation, heat rate, emissions, and operational performance information for Genera's generating facilities. The exhibit contains proprietary technical analyses and operational information whose disclosure would reveal sensitive operational characteristics of Puerto Rico's critical energy infrastructure while also diminishing the commercial value derived from maintaining such information confidential.

III. MEMORANDUM OF LAW IN SUPPORT OF CONFIDENTIAL TREATMENT OF EXHIBITS 2B, 2D, 2I, 2J, 2K, 2L, AND 2M TO GENERA'S JULY 20, 2026 MOTION

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 addition to the aforementioned, it is worth noting that Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M to the July 20 Motion contain confidential commercial information and trade secrets. Under Act No. 80-2011, also known as the Industrial and Trade Secret Protection Act of Puerto Rico ("Act No. 80-2011"), such information may be granted protection as trade secrets. 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.

For purposes 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).

Moreover, Exhibits 2D, 2J, 2K, 2L, and 2M to the July 20 Motion also contain Critical Energy Infrastructure Information ("CEII"). Federal regulations 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”)³, which is defined by statute as “information not customarily in

³ Regarding protection of voluntary disclosures of critical infrastructure information, the CII Act states, 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.

the public domain and related to the security of critical infrastructure or protected systems.” *See*, 6 U.S.C. § 650 (4)⁴. With respect 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, 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

⁴ 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.

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. Grounds for Confidentiality

The information contained in **Exhibits 2B (Cost of Generation Q4 FY2026), 2D (Q4 Fuel Consumption, Generation & Heat Rates), 2I (Decommissioning Cost Efficiency Data), 2J (Fuel Consumption and Emissions Calculations – April 2026), 2K (Fuel Consumption and Emissions Calculations – May 2026), 2L (Fuel Consumption and Emissions Calculations – June 2026), and 2M (Fuel Consumption and Emissions Calculations Q4 FY2026 Summary)** to the July 20 Motion constitutes trade secrets within the meaning of Act No. 80-2011.

These exhibits contain proprietary commercial and operational information developed by Genera in the ordinary course of operating the Legacy Generation Assets, including generation costs, fuel consumption, heat rates, operational efficiency, emissions calculations, and internal cost analyses. Such information derives independent economic value from not being generally known or readily ascertainable through proper means and is the subject of efforts to maintain its confidentiality. Disclosure would diminish the commercial advantage derived from maintaining such information confidential. Accordingly, **Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M** qualify for trade secret protection under Act No. 80-2011.

Moreover, Exhibits **2D, 2J, 2K, 2L, and 2M** contain Critical Energy Infrastructure Information ("CEII") and Critical Infrastructure Information ("CII"). These exhibits include detailed operational information concerning the generation of electric energy, including fuel consumption, heat rates, generation performance, and emissions calculations associated with the

Legacy Generation Assets. Because this information relates directly to the operation of critical energy infrastructure, it constitutes CEII and CII.

Additionally, 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. Because **Exhibits 2D, 2J, 2K, 2L, and 2M** relate directly to the operation and performance of the Legacy Generation Assets, the information contained therein is also entitled to the protections afforded by Act No. 40-2024.

In light of the foregoing, Genera respectfully requests that the Energy Bureau maintain the confidentiality of **Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M**. This measure is essential not only as a legal necessity but also as a practical means of protecting Genera's proprietary commercial information and safeguarding sensitive information concerning the operation of the Legacy Generation Assets.

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the above for all purposes; **grant confidential treatment to Exhibits 2B, 2D, 2I, 2J, 2K, 2L, and 2M** to the July 20 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 30th day of July 2026.

[Signature page follows]

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

RUA Núm. 9,669

/s/ José Javier Díaz Alonso

José Javier Díaz Alonso

jdiaz@ecija.com

RUA Núm. 21,718

/s/ Ernesto Raúl Ramos Maldonado

Ernesto Raúl Ramos Maldonado

eramos@ecija.com

RUA Núm. 23,882

CERTIFICATE OF SERVICE

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

In San Juan, Puerto Rico, this 30th 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