

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

NEPR

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IN RE: PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED
ELÉCTRICA

CASE NO. NEPR-MI-2024-0005

**SUBJECT: Joint Motion for Extension of Time to
Comply with August 12, 2026, Resolution and Order**

**JOINT MOTION FOR EXTENSION OF TIME TO COMPLY WITH AUGUST 12, 2026,
RESOLUTION AND ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and LUMA Energy Servco, LLC (“ServCo”) (jointly referred to as “LUMA”), **Genera PR LLC** (“Genera”) and the **Puerto Rico Electric Power Authority** (“PREPA”), through their respective undersigned counsel, and respectfully state and request the following:

I. Relevant Procedural Background

1. On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) issued a *Resolution and Order* (the “March 28th Resolution”) in which it ordered that, starting on April 27, 2025, LUMA, Genera and PREPA provide a monthly status report of the activities established in the Electrical System Priority Stabilization Plan approved by the Energy Bureau therein (“PSP”). *See* March 28th Resolution, p. 11. The Energy Bureau further directed that LUMA file these status reports as one collaborative report, which should include, but not be limited to, a detailed discussion of each activity’s progress

and any potential implementation issues and proactive solutions to the same (the “Collaborative Report”). *Id.*¹

2. On August 12, 2026, the Energy Bureau issued a *Resolution and Order* (“August 12th Resolution”) in which it acknowledged that the Collaborative Report filed on July 28, 2026, reflects material progress in several areas but that certain PSP activities remain incomplete, dependent upon other projects, subject to procurement or regulatory approvals or without a firm completion date. *See* August 12th Resolution, p.1. The Energy Bureau then raised the need for PREPA, Genera and LUMA (the “PSP Parties”) to prepare a consolidated and definite critical-path schedule for the remaining PSP work activities, rather than separate project descriptions that cannot readily be reconciled into a system-wide implementation deadline, so that the Energy Bureau can readily determine whether the activities are on track, which dependencies control the completion date or what corrective actions are being taken when approved or previously reported milestones are missing. *See id.* pp. 1-2.

3. Accordingly, the Energy Bureau ordered the PSP Parties to file a “joint verified Priority Stabilization Plan Status and Critical-Path Report” (“Joint Report”) within fifteen (15) calendar days from notification of the August 12th Resolution, that is, by August 27, 2026. *See id.*, p. 3. The Joint Report must include: (1) A consolidated table with the information specified in the August 12th Resolution (including the activity and responsible entity, original milestone or completion date, current percentage or measurable level of completion, remaining material actions or approvals, responsible party for each prerequisite, current status, firm target completion date, schedule variance and reason, corrective action being taken, and whether Energy Bureau action is required); (2) a system-wide critical-path schedule showing dependencies among remaining PSP

¹ The Energy Bureau has established additional reporting requirements through its *July 16, 2026, Resolution and Order*, and its *February 18, 2026, Resolution and Order* issued in the present docket.

activities and firm target completion dates for each critical activity; and (3) specifically address several high-priority matters identified in the August 12th Resolution. *See id.*, pp. 3-4. The identified high-priority matters are: The 800 MW temporary emergency base generation procurement; the 244 MW flexible generation program; Genera's 430 MW utility-scale BESS program; the remaining short-term generation repairs and critical-component work affecting available capacity at Aguirre, San Juan, Costa Sur, Palo Seco, and any other unit included in the PSP; the ASAP Standard Offer 1 BESS program; the four 25 MW BESS projects on the LUMA 38 kV system; the remaining transmission hardening, protection and control, RTU replacement, substation rehabilitation, and other transmission activities under the PSP; and the Comprehensive Transmission Plan. *Id.* pp. 3-4. The Energy Bureau further directed that, if the PSP Parties cannot agree on any part of the report, the joint filing must identify each disputed issue and state each entity's position separately. *See id.*, 2-3.

4. Finally, in the August 12th Resolution, the Energy Bureau further directs the PSP Parties to incorporate the new milestone and critical-path information into future Monthly Collaborative Reports, starting with the next report, while clarifying that all prior reporting and implementation obligations remain in full force and effect, except to the extent clarified or modified in the August 12th Resolution. *Id.*, p. 4.

II. Request for Extension

5. The PSP Parties respectfully submit that the 15-day period provided to prepare the Joint Report is insufficient given the breadth and complexity of the information that must be compiled, discussed, verified, and coordinated. Preparing the Joint Report will require substantial internal coordination within each PSP Party across multiple departments and subject-matter teams

responsible for the relevant PSP activities. It will also require coordination among the PSP Parties to agree on the contents of the Joint Report.

6. The PSP Parties anticipate that these internal and external coordination efforts will require scheduling and holding several meetings among the PSP Parties and their respective technical, operational, and regulatory teams. Given the number of stakeholders involved and the PSP Parties' varying schedules, successfully completing that process within the 15-day period established in the August 12th Resolution would be extremely difficult. In addition, because the Joint Report must identify any disputed issues if agreement cannot be reached, the PSP Parties will need sufficient time not only to develop the new report format and compile the required information, but also to confer regarding the contents of the filing and attempt to resolve any differences.

7. The requested extension is also warranted because the PSP Parties are simultaneously working on the upcoming August Collaborative Report, which is due on the same date as the Joint Report. Preparing both filings at the same time would require the PSP Parties to address overlapping but distinct reporting obligations within the same compressed timeframe.

8. Finally, the PSP Parties will also need time to seek clarification from the Energy Bureau regarding the requirements of the August 12th Resolution. Given that this report will be the template used for future reports, the PSP Parties want to ensure it successfully addresses the Energy Bureau's requirements and expectations. For these purposes, the PSP Parties are also respectfully requesting the Energy Bureau the opportunity to discuss those questions with the Energy Bureau and/or its consultants.

9. For all the reasons stated above, the PSP Parties respectfully request the Energy Bureau to grant an extension of thirty (30) days- that is, until September 27, 2026- to submit the

Joint Report. The PSP Parties submit this request in good faith, without intending to cause undue delay, and for purposes of treating each filing before the Energy Bureau with the time and attention it deserves.

WHEREFORE, LUMA, Genera and PREPA respectfully request that the Energy Bureau **take notice** of the foregoing, **grant** this *Joint Motion for Extension of Time to Comply with the August 12, 2026, Resolution and Order*, and, accordingly, (a) **find** that the PSP Parties may meet with the Energy Bureau and/or its consultants to seek guidance and clarification on the requirements of the Priority Stabilization Plan Status and Critical-Path Report and (b) **extend** the deadline to file the Priority Stabilization Plan Status and Critical-Path Report until September 27, 2026.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, this 21st day of August 2026.

We hereby certify that we filed this Motion using the electronic filing system of this Energy Bureau.

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