

**GOVERNMENT OF PUERTO RICO
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 FOR FINAL BRIEF EXTENSION OF TIME

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

1. On April 15, 2026, the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") issued *Final Resolution and Order on Electricity Rates* ("Final Resolution") requiring PREPA, among other things, to:

[F]ile 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...

(hereinafter, "Scope Delineation Memoranda")

2. On June 16, 2026, PREPA filed *Motion Requesting Extension of Time* ("June 16 Motion"), requesting a forty-five (45)-day extension to submit the Scope Delineation Memoranda. PREPA explained that significant operational and resource constraints had materially impaired its ability to complete the required memoranda within the prescribed timeframe. Specifically, PREPA explained that the authorized funding under its professional services contract with González & Martínez Law Offices, P.S.C. ("G&M") for Fiscal Year 2026 had been exhausted in May 2026, preventing

G&M from continuing to provide legal services to PREPA in regulatory matters pending before the Energy Bureau, as well as in cases pending before other administrative and judicial forums. Consequently, PREPA's Legal Affairs Directorate, which consists of only three attorneys, was required to assume responsibility for all regulatory filings before the Energy Bureau while simultaneously handling numerous other legal, regulatory, contractual, and operational matters on PREPA's behalf.

3. After obtaining the required approvals from the applicable fiscal and regulatory entities, the contract of the undersigned law firm for Fiscal Year 2027 was registered with the Office of the Comptroller of Puerto Rico on August 10, 2026. Only then was the firm able to resume handling the matters pending before the Energy Bureau, including the above-captioned matter.

4. PREPA recently identified that, amid the exceptional circumstances and transition described above, the Scope Delineation Memoranda were inadvertently not filed by the extended deadline. This omission was neither willful nor intended to disregard the Energy Bureau's directives. Rather, it resulted from the extraordinary operational constraints affecting PREPA's limited legal personnel and the interruption and subsequent resumption of the undersigned firm's professional services.

5. Upon identifying the omission, PREPA promptly took steps to address it. PREPA respectfully apologizes to the Energy Bureau for this inadvertent oversight and requests a final extension of seven (7) days to complete and file the Scope Delineation Memoranda.

6. The requested extension is brief, is sought in good faith, and will allow PREPA to submit complete and accurate Scope Delineation Memoranda in compliance with the Final Resolution.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take notice of the foregoing and grant PREPA a final extension of seven (7) days to file the Scope Delineation Memoranda required by the April 15, 2026 Final Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 8th day of September 2026.

CERTIFICATE OF FILING AND SERVICE: It is hereby certified that this document was filed with the Office of the Clerk of the Energy Bureau through its electronic filing system, available at <https://radicacion.energia.pr.gov/login>. It is further certified that a file-stamped copy of the foregoing document was served upon the parties in the above-captioned proceeding at the following email addresses: LUMA Energy, LLC and LUMA Energy ServCo, LLC, through Margarita Mercado, margarita.mercado@us.dlapiper.com; Yahaira de la Rosa, Yahaira.delarosa@us.dlapiper.com; Jan Albino Lopez, jan.albinolopez@us.dlapiper.com; Katiuska Bolanos Lugo, katiuska.bolanos-lugo@us.dlapiper.com; RegulatoryPREBOrders@lumapr.com; Genera PR LLC through: Ricardo Pallens, ricardo.pallens@genera-pr.com; Jorge Fernández Reboredo, jfr@sbgblaw.com and jfernandez@ecija.com; Ernesto Ramos Maldonado, emaldonado@sbgblaw.com and eramos@ecija.com;

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