

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

IN RE: REVIEW OF LUMA'S INITIAL
BUDGETS

CASE NO.: NEPR-MI-2021-0004

NEPR

Received:

Sep 16, 2026

8:08 PM

**MOTION TO SUBMIT SCOPE DELINEATION MEMORANDUM IN COMPLIANCE WITH THE
FINAL RESOLUTION AND ORDER ON ELECTRIC RATES DATED APRIL 15, 2026**

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 Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued *Final Resolution and Order on Electricity Rates* ("Final Resolution") in the above-captioned proceeding.

2. In Chapter Five of the Final Resolution, while addressing PREPA's Legal Services expense, the Energy Bureau required PREPA to submit scope-delineation memoranda for its legal-services engagements exceeding \$200,000. Specifically, the Energy Bureau directed PREPA 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.

Final Resolution, Ch. Five, at 22.

3. The Final Resolution further required the memorandum to demonstrate that each legal engagement does not duplicate legal functions performed by LUMA

Energy, LLC, LUMA Energy ServCo, LLC (collectively, "LUMA"), or Genera PR LLC ("Genera") under their respective operation and maintenance agreements. Id.

4. In compliance with the foregoing directive, PREPA hereby submits, as Exhibit A, the Scope Delineation Memorandum pertaining to its legal-services engagement with the following law firms:

- a. O'Melveny & Myers LLP
- b. ERA Advisory Group LLC
- c. González & Martínez Law Offices, P.S.C.
- d. Morales Law, P.S.C.
- e. Pietrantoní Méndez & Álvarez, LLC

5. The Scope Delineation Memorandum describes the nature and scope of the legal engagement, identifies the matters and legal services assigned to the firm, sets forth the applicable attorney billing rates, and explains the basis for any rates exceeding \$400 per hour, if applicable.

6. The Scope Delineation Memorandum further explains that the services provided under the engagement concern PREPA's retained responsibilities, legal obligations, and institutional interests and do not duplicate the legal functions performed by LUMA or Genera under their respective operation and maintenance agreements.

7. Accordingly, PREPA respectfully submits that the Scope Delineation Memorandum provides the information required by the Final Resolution with respect to the legal-services engagement addressed therein.

WHEREFORE, PREPA respectfully requests that the Energy Bureau **TAKE NOTICE** of the Scope Delineation Memorandum for the legal-services engagement submitted as **Exhibit A** and **DEEM PREPA IN COMPLIANCE**, with the scope-delineation requirement established in Chapter Five of the April 15, 2026 Final Resolution.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th 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; Katuska Bolanos Lugo, katuska.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; legal@genera-pr.com; regulatory@genera-pr.com; and the Independent Consumer Protection Office through Hannia Rivera, hrivera@jrsp.pr.gov.

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