

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

NEPR

Received:

Sep 24, 2026

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IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE

CASE NO.: NEPR-MI-2020-0001

SUBJECT: LUMA's Submission of Responses to
Requests for Information in Compliance with
Resolution and Order of September 18, 2026 and
Resolution and Order of September 21, 2026

**SUBMISSION OF RESPONSES TO REQUESTS FOR INFORMATION IN
COMPLIANCE WITH ORDERS OF SEPTEMBER 18, 2026 AND SEPTEMBER 21, 2026
TO THE HONORABLE PUERTO RICO ENERGY BUREAU:**

COMES NOW LUMA Energy Servco, LLC ("LUMA"), through the undersigned counsel, and respectfully states and requests the following:

I. Procedural Background

1. On September 15, 2026, LUMA filed a *Motion Submitting FCA and PPCA Reconciliations for June-August 2026 and Calculated FCA, PPCA and FOS Factors for October-December 2026, and Memorandum of Law in Support of Confidential Treatment* (the "September 15 Motion").

2. On September 18, 2026, this Honorable Energy Bureau issued a *Resolution and Order* (the "September 18 Order") directing LUMA and Genera PR, LLC to appear at a Virtual Technical Conference scheduled for September 28, 2026, at 10:00 a.m., to clarify matters related to the proposed quarterly factors filed in the September 15 Motion. The September 18 Order also required LUMA and Genera to respond to a comprehensive Request for Information ("First RFI") contained in Attachment A thereto.

3. On September 19, 2026, LUMA filed an *Urgent Request for Brief Extension of Time to Respond to Request for Information*, requesting an extension until September 24, 2026, to respond

to the First RFI due to the breadth and complexity of the forty-six (46) detailed interrogatories contained therein.

4. On September 21, 2026, this Honorable Energy Bureau issued a *Resolution and Order* (the “September 21 Order”) granting LUMA’s request for an extension of time and ordering LUMA to submit its responses to the First RFI on or before Thursday, September 24, 2026, at 12:00 p.m. The September 21 Order also directed LUMA and Genera to respond to a Second Request for Information (“Second RFI”) attached thereto as Attachment A, also on or before Thursday, September 24, 2026, at 12:00 p.m.

5. This Motion is submitted in compliance with the September 18 Order and the September 21 Order.

II. Submission of Responses to Requests for Information

6. In compliance with the September 18 Order and the September 21 Order, LUMA hereby submits as Exhibit 1 its responses to the First and Second RFI set forth in Attachment A to the September 18 Order and September 21 Order, respectively. The revised reconciliation and calculated factors included in these responses, as further explained in attention to the first question, is included as Exhibit 2.¹

III. Request for Confidential Treatment

7. Certain information contained in Exhibit 1 and Exhibit 2 to this submission includes confidential information. This confidential information is the same information submitted with the September 15 Motion, and is protected from public disclosure as trade secrets under the Industrial and Trade Secret Protection Act of Puerto Rico, Act 80-2011, P.R. Laws Ann. Tit. 10 §§4131-4144. Accordingly, LUMA hereby reiterates and restates the arguments set forth in the

¹ On September 23, 2026, LUMA received a third set of RFIs which LUMA intends to address in a subsequent filing prior to the ordered deadline.

Memorandum of Law in Support of Confidential Treatment submitted with the September 15 Motion, and respectfully requests that the Energy Bureau grant confidential treatment to the corresponding information contained in Exhibit 1 and Exhibit 2 to this submission.

IV. Conclusion

WHEREFORE, LUMA respectfully requests that this Honorable Energy Bureau **TAKE NOTICE** of the aforementioned; **DEEM** LUMA in compliance with the September 18 Order and the September 21 Order; and **GRANT** the request to keep under seal the confidential information contained in Exhibit 1 and Exhibit 2 that is submitted with this Motion.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 24th day of September 2026.



DLA Piper (Puerto Rico) LLC

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/s/ Katuska Bolaños Lugo

Katuska Bolaños Lugo

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of September 2026, I filed the foregoing motion with the Clerk of the Puerto Rico Energy Bureau through the Energy Bureau's electronic filing system. I further certify that on the same date I served a true and correct copy of the foregoing filing upon all parties of record in this proceeding via the Energy Bureau's electronic filing system, in accordance with the applicable rules and regulations, including:

The Puerto Rico Electric Power Authority, through
alexis.rivera@prepa.pr.gov,
nzayas@gmlex.net,
rcruzfranqui@gmlex.net,
mvalle@gmlex.net,

Genera PR LLC, through
lrn@roman-negron.com,
legal@genera-pr.com,
regulatory@genera-pr.com,

The Independent Consumer Protection Office, through
hrivera@jrsp.pr.gov.

In Guaynabo, Puerto Rico, on the 24th day of September 2026.

/s/ Katiuska Bolaños Lugo
Katiuska Bolaños Lugo

Exhibit 1
LUMA's Responses to RFIs

Exhibit 2
Revised FY2026 Q1 Reconciliation & Q2 Factors
(To be submitted via email)