

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

NEPR

Received:

Sep 25, 2026

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IN RE: PUERTO RICO ELECTRIC POWER
AUTHORITY'S PERMANENT RATE

Case No.: NEPR-MI-2020-0001

Motion in Compliance with Resolution and
Order of September 23, 2026, and Supplementing
Responses to Requests for Information of
September 21, 2026

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER OF SEPTEMBER 23,
2026 AND SUPPLEMENTING RESPONSES TO REQUESTS FOR INFORMATION OF
SEPTEMBER 21, 2026**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW, GENERA PR, LLC (“Genera”), through its undersigned counsel and, very respectfully, STATES and PRAYS as follows:

1. On September 23, 2026, the Puerto Rico Energy Bureau (“Energy Bureau”) issued a *Resolution and Order* in the present proceeding (“September 23 Resolution”) concerning the quarterly fuel and purchased power factors proposed by LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”) for the October through December 2026 period.

2. Through the *September 23 Resolution*, the Energy Bureau ordered LUMA and Genera to respond to a Third Request for Information (“Third RFI”), attached as Attachment A to the Resolution, and directed each entity to provide its respective answers on or before Friday, September 25, 2026, at 12:00 p.m.

3. Upon review of the Third RFI, the requests set forth in RFIs 3.1(a) through (c), 3.2, 3.3, and 3.4 concern LUMA matters, including LUMA’s sales forecasts, billing determinants, calculation of the quarterly factors, treatment of uncollectibles, customer billing and collection information, and related reconciliation methodologies.

4. The *September 23 Resolution* directs RFIs 3.1(d) and 3.1(e) to both LUMA and Genera. Specifically, RFI 3.1(d) seeks information concerning the quantities of generation and purchased power projected for October through December 2026 to serve the additional 4,082,119 kWh of projected sales, while RFI 3.1(e) requests the corresponding projected fuel and purchased power costs.

5. Upon review and consideration of the particular information sought through these RFIs, Genera respectfully submits that LUMA, as Transmission and Distribution operator, is better positioned to respond to these questions and, accordingly, will defer to the responses LUMA provides in connection with them.

6. Because the remaining requests contained in the Third RFI are directed to LUMA, and seek information concerning matters within LUMA's functions and responsibilities, Genera respectfully submits that no further response from Genera is required as to those requests.

7. Finally, Genera submitted its responses to the RFI of September 21, 2026 yesterday morning. Upon review of the submission, Genera became aware that, inadvertently, the responses to RFIs 2.1(d) & (e) went unanswered.

8. Through this submission, Genera respectfully responds to both questions:

2.1 (d): Does PREPA or Genera have a BESS in service? If so, please identify each such BESS, when it was placed into service, and its storage and generation capabilities. If not, explain why not.

RESPONSE: No; BESS projects are still ongoing as detailed in monthly reports submitted in docket NEPR-MI-2021-0002.

2.1 (e): Does PREPA or Genera expect to have any BESS in service during the period October through December 2026? If so, please identify each such BESS, when it expected

to be placed into service, and its storage and generation capabilities. If not, explain why not.

RESPONSE: No; Commercial Operation Dates for BESS are detailed in monthly reports submitted in docket NEPR-MI-2021-0002.

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the foregoing and deem Genera in compliance with the *September 23 Resolution* and the *September 21 Resolution*.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of September 2026.

It is hereby certified that this Motion was filed using the electronic filing system of this Energy Bureau, and that electronic copies of this Motion will be notified to the following attorneys who have filed a notice of appearance in this case: RegulatoryPREBOrders@lumapr.com; yahaira.delarosa@us.dlapiper.com; margarita.mercado@us.dlapiper.com; katiuska.bolanos-lugo@us.dlapiper.com; kmercado@jrsp.pr.gov; wvera@jrsp.pr.gov; legal@genera-pr.com; regulatory@genera-pr.com; elias.sostre@aes.com; jesus.bolinaga@aes.com; nzayas@gmlex.net; rcruzfranqui@gmlex.net; mvalle@gmlex.net; Alexis.rivera@prepa.pr.gov; carlos.reyes@ecoelectrica.com, ccf@tcm.law; leslie.hufstetler@infinigenrenewables.com; notices@infinigenrenewables.com; he@infinigenrenewables.com; regulatory@patternenergy.com; apc@mcvpr.com.

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