

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

NEPR

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

Case No.: NEPR-MI-2020-0001

Motion for Extension of Time to Comply with
Resolution and Order of September 25, 2026, and
to Respond to Fourth Request for Information

**MOTION FOR EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND
ORDER OF SEPTEMBER 25,
2026 AND TO RESPOND TO FOURTH REQUEST FOR INFORMATION**

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 25, 2026, the Puerto Rico Energy Bureau (“Energy Bureau” or “PREB”) issued a *Resolution and Order* in the present proceeding (“September 25 Resolution”), through which it issued a Fourth Request for Information (“Fourth RFI”).

2. Through the *September 25 Resolution*, the Energy Bureau ordered Genera PR LLC (“Genera”), LUMA Energy, LLC and LUMA Energy ServCo, LLC (collectively, “LUMA”), and the Puerto Rico Electric Power Authority (“PREPA”) to submit their complete written responses to the Fourth RFI on or before tomorrow, Tuesday, September 29, 2026. The Energy Bureau further directed the parties to supplement their responses thereafter as additional information became available.

3. Attachment A to the *September 25 Resolution* divides the Fourth RFI by respondent. Part A is specifically directed to Genera and encompasses sixteen (16) principal RFIs, numbered 4.1 through 4.16. **Counting each numbered RFI and each of its lettered subparts,**

Part A contains sixty-seven (67) separately enumerated numbered and lettered items for Genera to address. Moreover, several of those items themselves call for numerous separate calculations, reconciliations, and supporting documents.

4. Despite its best efforts, Genera will not be able to complete its responses to the Fourth RFI by the September 29 deadline. The requested extension is not the product of delay or intentional disregard. Rather, it results from the extraordinary volume of regulatory work assigned to Genera during the past month, the unusually compressed period allowed for the *Fourth RFI*, and the fact that the same limited group of Genera officials and employees with the knowledge necessary to prepare the responses has simultaneously been required to address several other Energy Bureau directives and operational responsibilities.

5. The Fourth RFI represents the **fourth request for information issued in this proceeding within approximately one week**. On September 18, 2026, the Energy Bureau issued its First Request for Information (“First RFI”), requiring Genera and LUMA to provide responses by September 22, 2026, and directing Genera to obtain and submit certain responses from PREPA. The First RFI consisted of forty-six (46) numbered requests, many containing multiple subparts, addressing (i) fuel supply and delivery, (ii) generating unit outages, (iii) natural gas nominations, (iv) liquid fuel use and costs, and (v) numerous other matters related to the June through August 2026 reconciliation period and the proposed October through December 2026 factors.

6. Genera filed its initial responses to the First RFI on September 22, 2026. Because certain responses required additional technical information and coordination, Genera requested a limited two-day extension as to those remaining matters and continued working on them.

7. In the interim, on September 21, 2026, the Energy Bureau issued a Second Request for Information (“Second RFI”), requiring responses by September 24, 2026. The Second RFI sought further detailed information regarding, among other things, natural gas availability and

usage at San Juan Combined Cycle Units 5 and 6 and Costa Sur. Genera thereafter filed, on September 24, 2026, its remaining responses to the First RFI together with its responses to the Second RFI and the responsive information obtained from PREPA.

8. On September 23, 2026, while Genera was still preparing the foregoing responses, the Energy Bureau issued a Third Request for Information (“Third RFI”), with responses due on September 25, 2026. Genera reviewed the Third RFI, determined the requests therein requiring information from Genera, and timely prepared and submitted its responses.

9. On September 25, 2026, shortly after submitting its responses to the Third RFI, Genera received a Fourth RFI from the Energy Bureau. It required answers to the aforementioned sixty-seven (67) items by the following Tuesday, September 29, 2026. The intervening weekend was immediately followed by the September 28 Virtual Technical Conference. As a practical matter, Genera was afforded approximately only a working day and a half in which to investigate and prepare responses to dozens of highly detailed requests for technical, operational, contractual, and financial information.

10. Moreover, the September 25 Resolution itself required Genera to have at today’s Technical Conference the personnel of its Fuels Department. Those are precisely the officials and employees whose knowledge and participation are indispensable to preparing the Fourth RFI responses. Accordingly, those Genera officials and employees spent substantial time preparing for the Technical Conference and appeared before the Energy Bureau today, September 28, 2026. The Technical Conference began at 10:00 a.m. and continued until approximately 4:09 p.m. During that time, those employees were required to address questions from the Energy Bureau, its staff, and consultants concerning many of the same operational matters contained in the Fourth RFI.

11. This workload cannot be considered in isolation from Genera’s immediate operational responsibilities. The same personnel are presently engaged in efforts to identify and

secure additional sources and suppliers of natural gas to address Puerto Rico's generation needs. Those efforts are ongoing and time-sensitive and require the attention of many of the same individuals from whom the information necessary to answer the Fourth RFI must be obtained.

12. In parallel form, on August 31, 2026, in *In re: Electric System Priority Stabilization Plan*, Case No. NEPR-MI-2024-0005, the Energy Bureau issued a separate *Resolution and Order* containing an extensive Requirement of Information concerning the temporary generation fleet located at San Juan and Palo Seco. Genera submitted substantial responses to that Requirement of Information on September 9, 2026. Because several of those requests required additional highly technical and detailed information, sixteen (16) items or subparts remained pending—ROIs 5(j), 6(a), 6(b), 7(e), 7(f), 7(g), 8(c), 11, 12, 13, 14, 15, 16, 21, 22 and 26. Genera thereafter appeared before the Energy Bureau at the Technical Conference held in that proceeding on September 15, 2026. **At that Technical Conference, the Energy Bureau directed Genera to submit the remaining responses by September 30, 2026.**

13. The responses due on September, 2026 are presently being prepared and, once again, require the participation of substantially the same Genera personnel who participated in the responses to the First, Second and Third RFIs, and who attended and testified at today's Technical Conference. They are also the ones who must compile and verify the extensive information responsive to the Fourth RFI.

14. Viewed collectively, these circumstances not only establish good cause of the extension requested, but clearly show that Genera has continuously and diligently complied with the Energy Bureau's directives throughout the past month. Genera has undertaken these efforts in good faith and has consistently cooperated with the Energy Bureau.

15. Genera remains committed to continuing that cooperation. However, given the extraordinary volume and detail of the Fourth RFI, its notification shortly after noon on September

25, today's Technical Conference, the September 30 deadline in Case No. NEPR-MI-2024-0005, and Genera's concurrent operational responsibilities, we cannot reasonably finalize and submit complete and accurate responses by tomorrow's deadline.

16. Accordingly, Genera respectfully requests a brief extension of seven (7) days, until October 6, 2026, to submit its responses to the Fourth RFI. Genera submits that this request is reasonable and is sought in good faith, and will not unduly delay these proceedings.¹

WHEREFORE, Genera respectfully requests that the Energy Bureau take notice of the foregoing and grant Genera an extension of seven (7) days, until **October 6, 2026**, to submit its responses to the Fourth Request for Information, and grant such other relief as the Energy Bureau may deem just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of June 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; hrivera@jrsp.pr.gov; legal@genera-pr.com; regulatory@genera-pr.com.

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¹ It is important to underscore that the *September 25 Resolution* itself recognizes that the Fourth RFI is of a continuing nature and requires the parties to supplement their responses as relevant information develops. Also, various of the matters object of the Fourth RFI were discussed in today's Technical Conference.