

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

NEPR

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IN RE: PLAN PRIORITARIO PARA LA
ESTABILIZACIÓN DE LA RED ELÉCTRICA

CASE NO.: NEPR-MI-2024-0005

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO COMPLY WITH AUGUST 12, 2026,
RESOLUTION AND ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW the Puerto Rico Electric Power Authority ("PREPA"), LUMA Energy, LLC and LUMA Energy ServCo, LLC ("ServCo") (jointly referred to as "LUMA"), and Genera PR LLC ("Genera"), through their respective undersigned counsel, and respectfully state and request the following:

I. Relevant Procedural Background

1. On March 28, 2025, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau") issued a Resolution and Order (the "March 28th Resolution") in which it ordered that, starting on April 27, 2025, LUMA, Genera and PREPA provide a monthly status report of the activities established in the Electrical System Priority Stabilization Plan approved by the Energy Bureau therein ("PSP"). The Energy Bureau further directed that LUMA file these status reports as one collaborative report, which should include, but not be limited to, a detailed discussion of each activity's progress and any potential implementation issues and proactive solutions to the same (the "Collaborative Report").

2. On August 12, 2026, the Energy Bureau issued a Resolution and Order ("August 12th Resolution") in which it acknowledged that the Collaborative Report

filed on July 28, 2026, reflects material progress in several areas but that certain PSP activities remain incomplete, dependent upon other projects, subject to procurement or regulatory approvals or without a firm completion date. The Energy Bureau then raised the need for PREPA, Genera and LUMA (jointly, the "PSP Parties") to prepare a consolidated and definite critical-path schedule for the remaining PSP work activities, rather than separate project descriptions that cannot readily be reconciled into a system-wide implementation deadline, so that the Energy Bureau can readily determine whether the activities are on track, which dependencies control the completion date or what corrective actions are being taken when approved or previously reported milestones are missing.

3. Accordingly, the Energy Bureau ordered the PSP Parties to file a "joint verified Priority Stabilization Plan Status and Critical-Path Report" ("Joint Report") within fifteen (15) calendar days from notification of the August 12th Resolution, that is, by August 27, 2026. Per the August 12th Resolution, the Joint Report was required to include: (1) a consolidated table with the information specified in the August 12th Resolution (including the activity and responsible entity, original milestone or completion date, current percentage or measurable level of completion, remaining material actions or approvals, responsible party for each prerequisite, current status, firm target completion date, schedule variance and reason, corrective action being taken, and whether Energy Bureau action is required); (2) a system-wide critical-path schedule showing dependencies among remaining PSP activities and firm target completion dates for each critical activity; and (3) specifically address several high-priority matters identified therein. The identified high-priority matters were: the 800 MW

temporary emergency base generation procurement; the 244 MW flexible generation program; Genera's 430 MW utility-scale BESS program; the remaining short-term generation repairs and critical-component work affecting available capacity at Aguirre, San Juan, Costa Sur, Palo Seco, and any other unit included in the PSP; the ASAP Standard Offer 1 BESS program; the four 25 MW BESS projects on the LUMA 38 kV system; the remaining transmission hardening, protection and control, RTU replacement, substation rehabilitation, and other transmission activities under the PSP; and the Comprehensive Transmission Plan. The Energy Bureau further directed that, if the PSP Parties could not agree on any part of the report, the joint filing must identify each disputed issue and state each entity's position separately.

4. Finally, the Energy Bureau further directed the PSP Parties to incorporate the new milestone and critical-path information into future Monthly Collaborative Reports, starting with the next report, while clarifying that all prior reporting and implementation obligations remain in full force and effect, except to the extent clarified or modified in the August 12th Resolution.

II. Second Request for Extension

5. On August 21, 2026, the PSP Parties filed a *Joint Motion for Extension of Time to Comply with August 12, 2026, Resolution and Order*, requesting that the Energy Bureau extend the deadline to submit the Joint Report until September 27, 2026.

6. The PSP Parties have continued working toward completion of the Joint Report.

7. LUMA informs that it had the information necessary to submit its portion of the Joint Report and Monthly Collaborative Report today. However, recognizing the need for the Joint Report to include the information necessary from all PSP Parties and to be submitted as a coordinated joint filing, LUMA has agreed to the requested forty-eight (48) hour extension to allow PREPA to submit its portion of the Joint Report and the Monthly Collaborative Report.

8. PREPA requires a brief additional period to complete and finalize the portions of the Joint Report for which it is responsible. Specifically, the attorney responsible for coordinating and preparing the Joint Report on PREPA's behalf, Blanche González, recently resigned from her position. As a result of this unexpected personnel change, responsibility for completing PREPA's portions of the Joint Report had to be reassigned, requiring an expedited transition and review of the information and materials necessary to complete PREPA's contribution to the Joint Report.

9. PREPA therefore requires an additional forty-eight (48) hours to complete its portions of the Joint Report and provide them for incorporation into the joint filing. This limited additional period will allow the newly assigned personnel to complete the necessary review and ensure that PREPA's information is accurately and fully reflected in the Joint Report.

10. The PSP Parties also respectfully request that the same forty-eight (48) hour extension be granted for the filing of the Monthly Collaborative Report otherwise due today, September 28, 2026. As explained above, the March 28th Resolution requires the PSP Parties to provide monthly status reports concerning the activities established in the PSP, which LUMA files as a single Collaborative Report on behalf of

the PSP Parties. Moreover, the August 12th Resolution expressly directed the PSP Parties, beginning with the next Monthly Collaborative Report, to incorporate the milestone and critical-path information established in response to that Resolution and Order.

11. As previously explained, PREPA's unexpected personnel transition affected not only its ability to finalize its contribution to the Joint Report, but also its ability to compile and timely provide the information required for incorporation into the Monthly Collaborative Report. Because the Monthly Collaborative Report must now incorporate the milestone and critical-path information developed in response to the August 12th Resolution, the additional forty-eight (48) hours requested herein will allow PREPA to complete the necessary review and provide the information required for both filings in a complete, accurate, and coordinated manner. Accordingly, the PSP Parties respectfully request that the Energy Bureau grant an additional forty-eight (48) hours, until September 30, 2026, to submit both the Joint Report and the Monthly Collaborative Report.

12. The requested extension is limited in duration and is necessitated by the unexpected personnel transition described above. The PSP Parties submit this request in good faith, without intending to cause undue delay, and for purposes of ensuring that the information submitted to the Energy Bureau in both the Joint Report and the Monthly Collaborative Report is complete, accurate, and properly coordinated among the PSP Parties.

WHEREFORE, PREPA, LUMA and Genera very respectfully request that the Energy Bureau **TAKE NOTICE** of the foregoing, **GRANT** this Second Joint Motion for Extension

of Time to Comply with the August 12, 2026 Resolution and Order and to File Monthly Collaborative Report, and **EXTEND** until September 30, 2026, the deadlines to file (i) the joint verified Priority Stabilization Plan Status and Critical-Path Report required by the August 12, 2026 Resolution and Order, and (ii) the Monthly Collaborative Report required pursuant to the March 28, 2025 Resolution and Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th 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>.

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