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

IN RE: REVIEW OF LUMA'S INITIAL BUDGETS	**CASE NO.:** NEPR-MI-2021-0004 **SUBJECT**: LUMA's Motion Regarding Genera's *Motion to Inform Lack of Funding of the Genera Contingency Reserve Account and Request for Order Directing Immediate Funding*

MOTION REGARDING THE ELECTRIC SYSTEM CASH POSITION AND LIQUIDITY SITUATION

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and **LUMA Energy ServCo, LLC** (jointly referred to as "LUMA") and respectfully state and request the following:

I. Introduction

1. LUMA files this Motion in connection with Genera's Motion to Inform Lack of Funding of the Genera Contingency Reserve Account and Request for Order Directing Immediate Funding filed by Genera PR, LLC ("Genera") on September 11, 2026 (the "Genera Motion"). LUMA respectfully submits that any request for funding of Genera's Contingency Reserve Account must be evaluated in the context of the significant funding deficiencies currently affecting the entire Electric System. As detailed herein and in LUMA's August 18 Informative Report, the System's cash position is materially constrained, and any additional allocation of funds to a single account would further erode the liquidity available to support the System's operations as a whole.

II. Background

2. On September 11, 2026, the Genera Motion requested that the Puerto Rico Energy Bureau (the "Energy Bureau") order the Puerto Rico Electric Power Authority ("PREPA") to

immediately fund the $30.0 million Genera Contingency Reserve Account established pursuant to the Energy Bureau's Resolution and Order of June 15, 2026 (the "June 15 Order"). In the Genera Motion, Genera alleges that the account remains unfunded and that the lack of funding impairs its ability to respond to emergencies, outages, and infrastructure failures.

3. On August 18, 2026, LUMA filed a *Motion to Submit Informative Report Regarding CBES, PPCA, FCA, and Cash Situation* (the "August 18 Motion"). *See* LUMA's *Motion to Submit Informative Report Regarding CBES, PPCA, FCA, and Cash Situation, In Re: Puerto Rico Electric Power Authority Permanent Rate,* Case No. NEPR-MI-2020-0001 (P.R. Energy Bureau Aug. 18, 2026). As part of the August 18 Motion, LUMA submitted Exhibit 2, which detailed the System's cash position and highlighted the significant funding pressures affecting the Energy System's liquidity (the "August 18 Informative Report"). *See* Exhibit 2, August 18 Motion.

4. As detailed in the August 18 Informative Report, as of the day before the August replenishment cycle, the Electric System's accounts remained collectively underfunded by approximately $37.5 million. *See* Exhibit 2, p. 3. This shortfall was distributed across the operating accounts as follows: the LUMA operating accounts were underfunded by approximately $30.5 million, the Genera operating account by approximately $6.2 million, and the PREPA operating account by approximately $0.8 million. *Id*. at 3-4.

5. The August 18 Informative Report further demonstrated that fuel costs have significantly exceeded Fuel Charge Adjustment ("FCA") revenues. From May through June 2026, the FCA revenue shortfall accumulated to approximately $108 million. *Id*. at 5. The reconciliation for June and July 2026 indicated that FCA revenues were insufficient to cover the cost of fuel consumed, resulting in a further shortfall of $75.9 million to be recovered through future billing

cycles. *Id.* at 7. These conditions reflect a System-wide liquidity constraint that extends beyond any single operator's accounts.

6. Based on LUMA's review of the funding data corresponding to August 2026, the funding deficiency for the System has continued. Specifically, LUMA has identified an approximate deficiency of $83.224 million for LUMA, $16.800 million for Genera, and $1.535 million for PREPA, for a total System-wide funding deficiency of approximately $101.559 million. This includes the underfunding carried forward from the prior month, as reported in the August 18 Informative Report.

7. The following table summarizes the System's funding position based on LUMA's review of the August 2026 funding data:

Collections	$340,028,560		
	Actual Funding	Funding Deficiency	Excess Funding
LUMA Operating Accounts	$38,624,000	$83,224,000	$0
Genera Operating Account	$7,800,000	$16,800,000	$0
PREPA Operating Account	$1,536,000	$1,535,092	$0
Purchased Power	$71,105,000	$0	$0
Energy Efficiency	$1,104,000	$0	$0
Pensions	$22,500,000	$0	$0
Fuel	$170,348,000	$0	$132,500,000

III. LUMA's Position

8. LUMA does not dispute that the June 15 Order authorized the establishment of Contingency Reserve Accounts for LUMA, Genera, and PREPA, or that such accounts serve an

important operational purpose. LUMA recognizes, as the Energy Bureau has determined, that maintaining readily available contingency funding enhances system preparedness, operational resilience, and the ability to respond expeditiously to events that "threaten the continuity, reliability, and safety of electric service." See June 15 Order, p. 2.

9. However, LUMA submits that any request for funding of Genera's Contingency Reserve Account, or any other specific reserve account, must be evaluated in the broader context of the Electric System's current liquidity position. As documented in the August 18 Informative Report and updated herein, the System is currently facing a substantial funding deficiency affecting all three operators. In this context, directing PREPA to transfer $30.0 million to fund Genera's Contingency Reserve Account would have the effect of further eroding the liquidity available for the System's essential operations.

10. LUMA respectfully urges the Energy Bureau to consider the funding deficiencies and liquidity constraints affecting the System as a whole when evaluating Genera's request. Any determination regarding the funding of reserve accounts should account for the System's overall cash position, the existing funding shortfalls across all operating accounts, and the practical constraints on PREPA's ability to fund such accounts without exacerbating the underfunding of other essential System operations.

WHEREFORE, LUMA respectfully requests that the Energy Bureau (i) **TAKE NOTICE** of the current funding deficiencies affecting the Electric System as detailed herein and in LUMA's August 18 Informative Report, including the total System-wide funding deficiency of approximately $101.559 million; (ii) **EVALUATE** Genera's request for funding of the Genera Contingency Reserve Account in the context of the System's overall liquidity position and existing funding shortfalls; (iii) **CONSIDER** the impact that any order directing PREPA to fund a specific reserve account would have on the System's available liquidity and on the funding of other essential operating accounts; and (iv) **GRANT** such other and further relief as the Energy Bureau deems just and proper.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 29th day of September 2026.

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th 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:

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In Guaynabo, Puerto Rico, on the 29th day of September 2026.

/s/ Katiuska Bolaños Lugo
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