

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

NEPR

Received:

Oct 5, 2026

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IN RE: Priority Plan for Electric Grid
Stabilization

CASE NO.: NEPR-MI-2024-0005

**PREPA'S RENEWED MOTION FOR A BRIEF TWO-DAY EXTENSION OF TIME TO COMPLY
WITH THE SEPTEMBER 14, 2026 RESOLUTION AND ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA"), through its undersigned legal representation, and respectfully **STATES AND PRAYS** as follows:

1. On September 14, 2026, the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") issued a *Resolution and Order* (the "September 14 Resolution") ordering PREPA to supplement, on or before September 30, 2026, its responses to Requests of Information ("ROIs") 30, 32, and 33 of the Energy Bureau's August 30, 2026 *Resolution and Order* with: (i) all correspondence and agreements requested therein, including the May 13, 2025 correspondence from NFE Power PR LLC; (ii) the correspondence relating to the award and cancellation of RFP 2024-0607; and (iii) the results of PREPA's inquiry to the Puerto Rico Public-Private Partnerships Authority ("P3A").

2. On September 30, 2026, PREPA moved for an extension until October 5, 2026, to submit that supplemental production, and until October 9, 2026, to file the joint PREPA-Genera statement also required by the September 14 Resolution or, if no stipulation could be reached between the parties, a separate statement by PREPA.

3. On October 1, 2026, the Energy Bureau granted both requests ("October 1 Resolution"). Accordingly, PREPA's supplemental production is presently due today, October 5, 2026.

4. Since the issuance of the September 14 Resolution, PREPA has undertaken an extensive review of its historical records and electronic communications to identify the documents responsive to the Energy Bureau's directives. PREPA has completed a substantial part of that review and continues working to complete the remaining portion as expeditiously as possible.

5. As part of this effort, PREPA's Information Technology Department conducted an internal compilation of potentially responsive electronic communications, which identified approximately thirteen gigabytes (13 GB) of data for review. The compilation was necessarily broad to ensure that potentially responsive communications were captured for review. Upon examining the resulting collection, however, PREPA determined that a substantial portion of the materials is either non-responsive to the Energy Bureau's directives or duplicative of other communications contained within the collection.

6. The volume and composition of the materials collected have made the review more time-consuming than PREPA reasonably anticipated. In particular, PREPA has had to review the collected communications to identify and segregate those that are responsive and non-duplicative before completing its production. This circumstance constitutes an unanticipated setback in PREPA's review process and has delayed completion of the supplemental production notwithstanding PREPA's diligent efforts to comply with the Energy Bureau's directives.

7. In addition, to complete its response to item (iii) of the September 14 Resolution, PREPA requested from P3A documents relating to the temporary generation units that are the subject of the ROIs ("TM Units"). This afternoon, October 5, 2026, P3A produced to PREPA an electronic file containing documents, letters, and e-mail communications related to the TM Units.

8. PREPA is presently reviewing the materials received from P3A to determine their responsiveness to the September 14 Resolution and to incorporate the responsive documents into its supplemental production. Because PREPA received these materials only this afternoon, it could not reasonably have completed their review and incorporation into its production before today's deadline.

9. PREPA is therefore simultaneously completing its review of the approximately 13 GB internal collection and reviewing the additional materials received from P3A today. PREPA continues to work diligently to complete these efforts and to submit responsive documentation that will provide the Energy Bureau with a complete and useful record in furtherance of the objectives of this proceeding.

10. Under these circumstances, PREPA respectfully requests a brief extension of **two (2) days**, until Wednesday, October 7, 2026, to complete its review and submit the supplemental production required by the September 14 Resolution with respect to ROIs 30, 32, and 33, including the responsive materials identified through PREPA's internal review and the results of its inquiry to P3A.

11. The requested extension is limited in duration and is necessitated by circumstances that PREPA could not reasonably have anticipated when it requested

the prior extension. The additional two business days will allow PREPA to complete its review and submit a consolidated supplemental production, rather than making piecemeal submissions that would require subsequent supplementation and make the Energy Bureau's review of the responsive materials less efficient.

12. PREPA has continued its review efforts throughout the applicable period and will continue working diligently to complete its production as soon as practicable. This request is made in good faith and not for purposes of delay, and the requested brief extension will allow PREPA to provide the Energy Bureau with a more complete, accurate, and useful production without materially prejudicing any party to this proceeding.

WHEREFORE, PREPA respectfully requests that the Energy Bureau take notice of the foregoing and **GRANT** PREPA an extension of two (2) business days, until **October 7, 2026**, to complete its review and submit the supplemental production required by the September 14 Resolution and Order with respect to PREPA's responses to ROIs 30, 32, and 33.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of October 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>. It is further certified that a file-stamped copy of the foregoing document was served upon the parties in the above-captioned proceeding at the following email addresses: LUMA Energy, LLC and LUMA Energy ServCo, LLC, through Margarita Mercado,

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