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

IN RE: GENERA PR LLC FUEL OPTIMIZATION PLAN	**CASE NO.:** NEPR-MI-2023-0004 **SUBJECT:** Urgent Request for Extension of Time to Submit Responses to the Requirements of Information in Compliance with Resolution and Order dated October 23, 2026

URGENT REQUEST FOR EXTENSION OF TIME TO SUBMIT RESPONSES TO THE REQUIREMENTS OF INFORMATION IN COMPLIANCE WITH RESOLUTION AND ORDER DATED OCTOBER 23, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW GENERA PR LLC ("Genera"), as agent of the Puerto Rico Electric Power Authority ("PREPA"),[1] through its counsel of record, and respectfully states and requests the following:

1. On July 18, 2023, the Puerto Rico Energy Bureau of the Public Service Regulatory Board ("Energy Bureau") initiated the instant proceeding to evaluate Genera's Fuel Optimization Plan ("FOP") pursuant to Section 4.2(t) of the LGA OMA. Between July 2023 and April 2024, the parties engaged in an extensive exchange of information, filings and regulatory directives.

2. Said process resulted in the final version of the FOP ("Final 2024 FOP"), which Genera filed on April 29, 2024. Subsequently, through a Resolution and Order issued on May 9, 2024, the Energy Bureau determined to evaluate Genera's proposed fuel swap in a separate proceeding, Case No. NEPR-MI-2024-0004. On May 23, 2024, a Technical Conference was held in the instant proceeding.

[1] Pursuant to the *Puerto Rico Thermal Generation Facilities Operation and Maintenance Agreement* ("LGA OMA"), dated January 24, 2023, executed by and among PREPA, Genera, and the Puerto Rico Public-Private Partnerships Authority, Genera is the sole operator and administrator of the Legacy Generation Assets (as defined in the LGA OMA) and the sole entity authorized to represent PREPA before PREB with respect to any matter related to the performance of any of the O&M Services provided by Genera under the LGA OMA.

3. On November 22, 2024, the Energy Bureau issued a Resolution and Order ("November 22 Resolution") approving Initiatives #1, #2 and #4 of the Final 2024 FOP, and rejecting without prejudice Initiatives #3, #5, #6, #7 and #8. Accordingly, Genera filed a *Motion to Reconsider* the November 22 Resolution, which the Energy Bureau denied through a Resolution issued on May 23, 2025.

4. On August 27, 2026, Genera filed a *Motion Requesting Approval of Updated Fuel Optimization Plan*, through which it submitted the Updated Fuel Optimization Plan ("Updated FOP") pursuant to Section 4.2(t) of the LGA OMA. The Updated FOP proposes five (5) Fuel Cost Savings Initiatives and their savings-calculation methodologies and was submitted solely for methodological approval.

5. On October 23, 2026, the Energy Bureau issued a Resolution and Order ("October 23 Order") ordering Genera, *inter alia*, to respond within ten (10) days to the requirements of information included as Annex 1 thereto ("Annex 1 ROIs").

6. Since the issuance of the October 23 Order, Genera has been working diligently to gather the information and prepare complete and accurate responses to the Annex 1 ROIs. The Annex 1 ROIs consist of seventeen (17) requirements, most of them with multiple subparts, which call for detailed technical analyses, workpapers, engineering studies and supporting documentation.

7. However, during the past weeks, Genera has received and attended to multiple additional requirements of information from the Energy Bureau in multiple proceedings. In addition, on the afternoon of Friday, October 30, 2026, Genera received an urgent requirement of information, which had to be answered by today, November 2, 2026. Genera fully complied with said expedited requirement and filed its responses this afternoon.

8. Consequently, despite the diligent and continuous efforts of Genera's personnel, specifically its fuel and operations teams, Genera is unable to submit complete and accurate responses to the Annex 1 ROIs within the term granted in the October 23 Order.

9. Accordingly, Genera respectfully requests an extension of ten (10) business days from the filing of this motion to submit its responses to the Annex 1 ROIs. Genera wishes to emphasize that this request is made in good faith and arises from circumstances beyond its control. It is not intended to interfere with the Energy Bureau's regulatory oversight, nor to evade or delay any regulatory obligation, but rather to ensure that the Energy Bureau receives complete, accurate and reliable responses to the Annex 1 ROIs.

WHEREFORE, Genera respectfully requests that the Energy Bureau **take notice** of the above for all purposes and **grant** Genera an extension of ten (10) business days from the filing of this motion to comply with the October 23 Order and submit its responses to the Annex 1 ROIs.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of November 2026.

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CERTIFICATE OF SERVICE

We hereby certify that a true and accurate copy of this motion was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System.

In San Juan, Puerto Rico, this 2nd day of November 2026.

/s/ Jorge A. Fernández Reboredo
Jorge A. Fernández Reboredo

/s/ José Javier Díaz Alonso
José Javier Díaz Alonso

/s/ Ernesto Raúl Ramos Maldonado
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