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

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY PERMANENT RATE	**CASE NO.:** NEPR-MI-2020-0001 **SUBJECT:** LUMA's Urgent Motion for Brief Extension of Time to Comply with Order Issued on November 6, 2026

URGENT MOTION FOR BRIEF EXTENSION OF TIME TO COMPLY WITH RESOLUTION AND ORDER OF NOVEMBER 6, 2026

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC and **LUMA Energy ServCo, LLC** (jointly, "LUMA"), through the undersigned counsel, and respectfully state and request the following:

I. Introduction

1. On Friday, November 6, 2026, this Honorable Puerto Rico Energy Bureau ("Energy Bureau") issued a *Resolution and Order* ("November 6th Order"), invoking Articles 6.3(s) and 6.4(b)(1) of Act No. 57-2014, and ordering LUMA and the Puerto Rico Electric Power Authority ("PREPA"), as applicable, to submit, with the greatest possible precision, information on the energy consumption and billing of persons and entities falling within the definition of micro, small, and medium-sized businesses (commonly known as "PYMES," the Spanish acronym for pequeñas y medianas empresas) under Article 2 of Act No. 62-2014, for the months of September and October 2026, and/or under any other classification developed by PREPA and LUMA. The November 6th Order was notified via electronic mail at 4:34 p.m.

2. Specifically, the November 6th Order directed that the information include the following account details: (i) the account holder; (ii) the Employer Identification Number (EIN); (iii) the amount of energy consumed in September and in October, separately; (iv) the amount billed in September and in October, separately; and (v) any other information deemed relevant.

The Energy Bureau ordered that the information be filed in electronic Excel format on or before 12:00 noon on Tuesday, November 10, 2026.

3. As explained below, LUMA has been working diligently to comply with the November 6th Order and respectfully requests a brief extension, until November 11, 2026, to do so. Compliance has required LUMA, first, to analyze and determine how best to respond to the November 6th Order, because LUMA does not classify its customers as PYMES. LUMA does not collect or manage data on the criteria that the law uses to define PYMES, and those criteria are not relevant to the establishment of customer classes, rates or any other service that LUMA provides. Specifically, LUMA has no means to identify, through its systems, the persons and entities that fall within the definitions of *Microempresa*, *Pequeños comerciantes*, and *Medianos comerciantes* under Article 2 of Act No. 62-2014. Thus, LUMA's customer databases contain no field that would allow LUMA to filter accounts according to the thresholds set forth in Act 62-2014.

4. The Energy Bureau anticipated this possibility, as the November 6th Order directs the production of information for PYMES "and/or under any other classification developed by PREPA and LUMA." November 6th Order at 1. Consistent with that directive, and after analyzing its available customer classifications, LUMA determined that the information closest to what the Energy Bureau requested is that of the Small Commercial Customer rate class under the General Service at Secondary Distribution Voltage ("GSS") rate. LUMA notes, however, that it cannot certify that every customer in the GSS rate class qualifies as a PYME under Act 62-2014, or that no PYMES are served under other rate classes.

5. Having made that determination, LUMA is now in the process of extracting the information requested in the November 6th Order for each account in the GSS rate class, which comprises approximately 6,000 customers. For each of those accounts, LUMA must extract the

specific data fields the Energy Bureau requested, including the energy consumption and amounts billed for September and October 2026, stated separately. Once extracted, accounting for a non-standard reporting method, the information must go through LUMA's data quality process to confirm that the information delivered to the Energy Bureau is complete, accurate, and correctly matched to each account. LUMA anticipates that the data quality process will be completed before November 11, 2026.

II. Request for Brief Extension of Time

6. LUMA respectfully requests that the Energy Bureau extend the deadline to comply with the November 6th Order until November 11, 2026. This request is made in **good faith**, **before the expiration of the compliance term**, and **not for purposes of delay**. LUMA is mindful of its duty, as an electric power service company, to fully comply with the orders and requirements of the Energy Bureau and to refrain from conduct that impedes, delays, or obstructs its proceedings. LUMA does not seek to avoid or narrow its obligations under the November 6th Order. To the contrary, LUMA seeks only the time necessary to discharge those obligations as closely as possible to what the Energy Bureau requested.

7. The need for additional time arises from the nature of the November 6th Order, not from any lack of diligence. The November 6th Order was notified to LUMA via electronic mail at 4:34 p.m. on Friday, November 6, 2026, late in the business day, and set a compliance deadline of 12:00 noon on Tuesday, November 10, 2026. LUMA was thus afforded, in effect, one full business day and a single morning to comply. Within that window, LUMA could not simply retrieve an existing report. It first had to analyze and determine how best to respond to a request framed in terms of a classification that LUMA does not use, and then, once it determined the appropriate customer class, extract account-level data for approximately 6,000 customers and subject that data

to its data quality process. That work cannot responsibly be compressed further without compromising the accuracy of the information.

8. The impediment is concrete and specific. LUMA maintains the account-level consumption and billing records at issue, and the obligation to comply rests on LUMA as an entity. Additional time is needed, rather, because of the nature of the request itself. The November 6th Order calls for information organized by reference to a classification that LUMA does not use, which required LUMA first to determine the appropriate response, and then to extract and validate the data for a substantial number of accounts.

9. LUMA asks for the time it needs, and no more. The requested extension is limited to a single day beyond the current deadline. LUMA has narrowly tailored its request to the actual status of its work, as the extraction of the information is ongoing and LUMA anticipates that its data quality process will be completed before the requested deadline. LUMA does not request an open-ended extension, nor one conditioned on future contingencies, but a short and definite date by which it expects to be in full compliance.

10. The brief extension will serve, rather than hinder, the Energy Bureau's objectives. The November 6th Order calls for information submitted with the greatest possible precision. A short period to complete the data quality process ensures that the information the Energy Bureau receives is accurate and reliable, and avoids the need for later corrections or supplemental filings that would burden the Energy Bureau and the parties alike.

11. Finally, it is LUMA's understanding that the requested extension will not cause undue prejudice to the Energy Bureau or to any party to this proceeding. The extension is for a single day, and, to LUMA's understanding, it does not disrupt any other procedural deadline or affect the rights of any party. Any marginal delay is amply outweighed by the benefit of receiving

complete and verified information. LUMA will continue to work diligently and will submit, as soon as its data quality process concludes, and in any event on or before November 11, 2026, the complete information requested, organized in electronic Excel format with each of the data fields enumerated in the November 6th Order, without relying on references to prior filings.

WHEREFORE, LUMA respectfully requests that this Honorable Energy Bureau: (i) **take notice** of the foregoing; (ii) **grant** LUMA a brief extension of time, until 5:00 p.m. on November 11, 2026, to comply with the November 6th Order; and (iii) **grant** any other relief it deems just and proper.

RESPECTFULLY SUBMITTED.

In Guaynabo, Puerto Rico, on the 9th day of November 2026.

DLA Piper (Puerto Rico) LLC
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of November 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 this motion upon all parties of record in this proceeding via electronic mail, in accordance with the applicable rules and regulations, including:

The Puerto Rico Electric Power Authority, through
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The Independent Consumer Protection Office, through
kmercado@jrsp.pr.gov.

In Guaynabo, Puerto Rico, on the 9th day of November 2026.

/s/ Katiuska Bolaños Lugo
Katiuska Bolaños Lugo