

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</p> <p>Debtors.<sup>1</sup></p>	<p>PROMESA Title III</p> <p>No. 17 BK 3283-LTS (Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor.</p>	<p>PROMESA Title III</p> <p>No. 17 BK 4780-LTS (Jointly Administered)</p> <p><b>Re: ECF No. 5477, 5480</b></p>

**AAFAF’S INFORMATIVE MOTION REGARDING MEDIATION TEAM’S REQUEST  
TO EXTEND LITIGATION STAY AND MEDIATION TERMINATION DATE**

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474), (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747), and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801).

**To the Honorable United States District Judge Laura Taylor Swain:**

The Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) respectfully joins the Mediation Team’s request, as set forth in the *Mediation Team’s Eighteenth Notice and Report* (the “Mediation Report”) [ECF. No 5477],<sup>2</sup> for entry of an order extending the Litigation Stay, as already granted by the Court [ECF No. 28767] through and including March 24, 2025, and the Mediation Termination Date through and including April 30, 2025 (as already granted by the Court). In support hereof, AAFAF states as follows:

1. On November 6, 2024, the people of Puerto Rico elected the Hon. Jenniffer González-Colón as Governor of Puerto Rico (the “Governor”). During her campaign, the Governor emphasized the need to comprehensively address and resolve all PREPA-related matters (including its pending Title III case) to ensure PREPA’s long term viability as a stable power utility that is capable of providing Puerto Rico’s citizens with essential services and the quality of life they deserve—including a reliable, efficient, and resilient electric service.

2. Upon assuming office, the Governor took swift action aimed at addressing Puerto Rico’s energy crisis. The Governor established the “Puerto Rico Energy Transformation Task Force” to provide expert guidance on achieving a robust, efficient, and affordable energy system. Additionally, the Governor appointed an “Energy Czar” to oversee and coordinate the Government of Puerto Rico’s public energy policy. The Energy Czar’s responsibilities include managing resources, aligning objectives, eliminating redundancies, fostering collaboration and communication across government entities, and ensuring a prompt and effective response to Puerto Rico’s energy challenges.

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<sup>2</sup> Capitalized terms used but not defined herein have the meaning set forth in the Mediation Report.

3. Concurrently, the Governor designated Francisco J. Domenech, Esq. as AAFAF's new Executive Director (the "Executive Director") with a mandate to take a proactive role in PREPA's Title III proceeding.

4. The Executive Director and the AAFAF team have been diligently working to gain a comprehensive understanding of the operational challenges faced by PREPA, the ongoing mediation process, and the intricacies of the Title III case and related litigation matters. As part of its proactive strategy, AAFAF is in the process of engaging the investment banking firm Houlihan Lokey, to provide new perspectives on potential approaches to resolve PREPA's Title III Case.

5. AAFAF intends, with Houlihan Lokey's assistance, to engage with key stakeholders in mediation in a consensus-building effort to achieve a confirmed PREPA plan of adjustment that aligns with Puerto Rico's need for a resilient electric utility that provides affordable and sustainable rates.

6. AAFAF strongly believes that the Court's ordered extensions are warranted and in the best interest of Puerto Rico and the Mediation Parties—providing the best path forward for this case's ultimate resolution.

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Dated: January 30, 2025  
San Juan, Puerto Rico

Respectfully submitted,

**O'MELVENY & MYERS LLP**

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