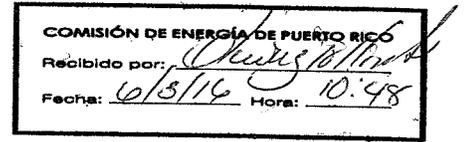


COMMONWEALTH OF PUERTO RICO  
PUERTO RICO ENERGY COMMISSION



IN RE:

PUERTO RICO ELECTRIC POWER  
AUTHORITY REVITALIZATION  
CORPORATION

Petitioner.

NO. CEPR-AP-2016-0001

**SUBJECT:** Motion to Extend Filing  
Date of Initial Briefs

**THE PREPA REVITALIZATION CORPORATION'S  
MOTION TO EXTEND THE FILING DATE FOR  
LEGAL BRIEFS TO INCORPORATE EVIDENCE TO BE  
PRESENTED AT THE JUNE 9<sup>TH</sup> TECHNICAL CONFERENCE**

Comes now the Petitioner Puerto Rico Electric Power Authority Revitalization Corporation (the "Corporation") and moves the honorable Puerto Rico Energy Commission (the "Commission") to consider extending the filing date for the Legal Briefs in this matter to the day after the technical conference that will be held on June 9, 2016 to address certain rate design issues. In support of this Motion, the Corporation states:

1. The current schedule in this proceeding, set pursuant to the Commission's *Nunc Pro Tunc* Resolution dated April 25, 2016, calls for Corporation and Intervenor Legal Briefs to be filed on June 6, 2016.

2. During the technical hearings held between May 24<sup>th</sup> and May 27<sup>th</sup>, the Commission, its advisors, and Intervenors asked the Corporation's witnesses various questions and shared certain suggested modified approaches regarding the proposed Transition Charge rate design included in the Petition and testimony. The Commission posed certain questions and requested additional information related to these modified approaches and questions in its

Resolution and Order dated May 31, 2016. The Corporation's responses are due no later than June 6, 2016.

3. In response to the inquiries and suggestions of the Commission and Intervenors, the Corporation currently is considering such suggested modified approaches to the Transition Charge rate design and will provide a timely response to the Commission request outlining an alternative rate design proposal.

4. The Commission will hold an additional technical conference to address rate design issues on June 9, 2016. Given the strong likelihood that the record will be supplemented and the issues before the Commission may be narrowed, the Corporation respectfully requests the due date for Legal Briefs to be extended to June 10, 2016 -- the day after the technical conference. This will allow the Corporation and Intervenors to more accurately address the issues and proposals before the Commission at that time.

5. The Corporation, therefore, respectfully suggests that the Commission revise the schedule in this proceeding to allow the submission of Legal Briefs by the Corporation and Intervenors on June 10, 2016.

**WE HEREBY CERTIFY** that the foregoing was sent via email to: José Pérez-Velez, Esq., (jperez@oipc.pr.gov); Coral M. Odio-Rivera, Esq., (codiot@oipc.pr.gov); Marc G. Roumain Prieto, Esq., (mgrprcorp@gmail.com); Fernando Agrait, Esq., (agraitfe@agraitlawpr.com); Edwin J. Quiñones Porrata, Esq., (edwin.quinones@aee.pr.gov); José G. Maeso Gonzalez, Esq. (jose.maeso@aee.pr.gov); Victor Luis Gonzalez, Esq., (victorluisgonzalez@yahoo.com); Alicia P. Perez Caballero, Esq., (aperez@fgrlaw.com); and Melissa Hernandez Carrasquillo, Esq. (mehernandez@fgrlaw.com); and Dr. Guillermo M. Riera, PE (guillermo.m.riera@gmail.com).

RESPECTFULLY SUBMITTED,

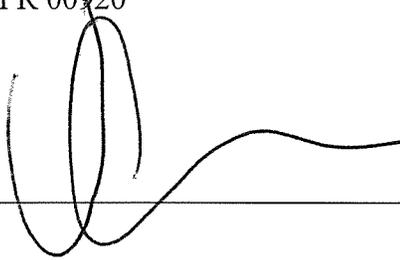
IN SAN JUAN, PUERTO RICO, THIS 3<sup>rd</sup> DAY OF JUNE, 2016

**PUERTO RICO ELECTRIC POWER  
AUTHORITY REVITALIZATION CORPORATION**

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Admisión por Cortesía (pending)

By: \_\_\_\_\_



By: \_\_\_\_\_

