

COMMONWEALTH OF PUERTO RICO  
PUERTO RICO ENERGY COMMISSION

COMISIÓN DE ENERGÍA DE PUERTO RICO	
Recibido por:	<i>Deisy Tullinch</i>
Fecha:	<i>5/27/16</i>
Hora:	<i>3:00</i>

IN RE: REVIEW OF RATES OF  
THE PUERTO RICO ELECTRIC  
POWER AUTHORITY,

Petitioner.

No.: CEPR-AP-2015-0001

SUBJECT: PREPA'S MOTION  
REGARDING FORM OF FILING  
OF OVERSIZE DOCUMENTS

**PREPA'S MOTION TO ALLOW COMPLIANCE WITH RATE  
FILING REQUIREMENTS BY SUBMISSION IN NATIVE  
ELECTRONIC FORMAT (ONLY) OF OVERSIZE DOCUMENTS  
THAT CAN NOT PRACTICALLY BE PRINTED**

**TO THE HONORABLE PUERTO RICO ENERGY COMMISSION:**

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") pursuant to Articles 6.3 and 6.25 of Act 57-2014, as amended, known as the Puerto Rico Energy Transformation and RELIEF Act ("Act 57"), and the Puerto Rico Energy Commission's (the "Commission") Regulations Nos. 8543 and 8720, and submits this Motion to Allow Compliance with Rate Filing Requirements by Submission in Native Electronic Format (Only) of Oversize Documents that Cannot Practically Be Printed. This Motion is supported by an Affidavit. In support of its Motion, PREPA states as follows:

1. Pursuant to Act 57, Regulation 8720, and other applicable laws and regulations, PREPA has filed today a petition (application) for new electric service rates along with required and appropriate supporting materials.

2. Section 3.01(F) of Regulation 8720 ("Section 3.01(F)") states that "[a]t the date of filing, a minimum of ten (10) complete sets of the applicant's schedules and exhibits shall be provided to the Commission, in addition to an electronic copy of the complete set."

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3. Several of the Schedules that are required by Section 3.01(F) to be filed in connection with PREPA's rate petition, including Schedules D-2, G-1, G-2, G-4, G-5, G-6, M-1, M-2, M-3, and N-1, are Excel spreadsheets that are so large in height and/or breadth, due to the number of columns and rows of data contained therein, that the Schedules cannot practically or usefully be condensed to a single page or combination of pages (by insertion of page breaks) for purposes of printing electronic ".pdf" versions or for hard copy printing purposes. By way of example, Schedule M-1 contains fifty (50) tabs, each with multiple columns and rows. If Schedule M-1 were to be submitted in printed form, the result would be 445 pages in length per copy, for a total of 4,450 pages (445 multiplied by 10), in order to be compliant with Section 3.01(F), and, as a practical matter, it would not be readable in any reasonable manner.

4. In filing its first rate petition, PREPA seeks to comply fully with all applicable laws and regulations. Additionally, PREPA seeks to provide the Commission with all required information in a manner that is environmentally sound, efficient, cost-effective, and practical, including readable.

5. To that end, PREPA requests that the Commission excuse PREPA from providing the required ten (10) printed hard copies (and .pdf copies) of D-2, G-1, G-2, G-4, G-5, G-6, M-1, M-2, M-3, and N-1; and, allow PREPA to provide said Schedules to the Commission in native Excel format only.



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6. Granting PREPA's request would in no way jeopardize the integrity of PREPA's rate petition or prejudice the Commission's review process or the rights of any other person or entity. To the contrary, allowing PREPA's request facilitates an efficient, streamlined, and environmentally conscious filing.

**WHEREFORE**, the Puerto Rico Electric Power Authority respectfully requests that the Commission excuse PREPA from providing the required ten (10) printed hard copies (and .pdf copies) of D-2, G-1, G-2, G-4, G-5, G-6, M-1, M-2, M-3, and N-1; allow PREPA to provide said Schedules to the Commission in native Excel format only; and extend such permission to any other items that also prove to be not practically printable, provided that PREPA promptly files an informative motion listing any such additional items.

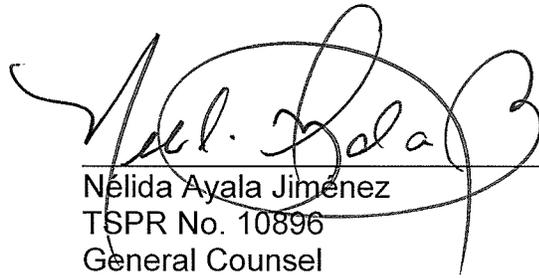
Respectfully submitted, on May 27, 2016.

A handwritten signature in black ink, appearing to be the initials 'JMF' or similar, located at the bottom left of the page.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have sent the above Motion to the Puerto Rico Energy  
Commission, through its General Legal Counsel, on May 27, 2016.

A handwritten signature in black ink, appearing to read "Néilda Ayala Jiménez", is written over a horizontal line. The signature is stylized and cursive.

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