

**COMMONWEALTH OF PUERTO RICO  
PUERTO RICO ENERGY COMMISSION**

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

NO. CEPR-AP-2015-0001

SUBJECT: VERIFIED COMBINED  
MOTION FOR CLARIFICATION,  
FOR LEAVE TO SUBMIT TABLE,  
AND FOR CONFIDENTIALITY  
DESIGNATION

**PREPA'S VERIFIED COMBINED MOTION FOR  
CLARIFICATION, FOR LEAVE TO SUBMIT TABLE,  
AND FOR CONFIDENTIALITY DESIGNATION**

TO THE HONORABLE PUERTO RICO ENERGY COMMISSION:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and requests that the Puerto Rico Energy Commission's (the "Commission"), with respect to its June 13, 2016, Resolution and Order on Determination of Filing Completeness ("June 13<sup>th</sup> Order"); (1) for clarification on the subjects of Schedule D-1 and the draft Public Notice; (2) for leave to submit an informative Table; and (3) for approval of a confidentiality designation and redactions. This Motion is supported by a Verification. In support of its Motion, PREPA states as follows:

1. On May 27, 2016, PREPA filed its rate Petition.
  2. On June 13, 2016, the Commission issued the above-referenced order.
  3. PREPA seeks clarification of the June 13<sup>th</sup> Order as to the item relating to Schedule D-1. There appear to be some words missing in the order on this subject. The order states in part: "This should be presented in a summary format with the test year information, including cost rates." The phrase "including cost rates" appears to be missing some words or, in any event, its meaning is not clear to PREPA. PREPA respectfully requests clarification of this item.
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4. PREPA also seeks clarification of the June 13<sup>th</sup> Order as to draft Public Notice. PREPA respectfully submits that the order is in error in finding a deficiency on this item. The order states in part: "Attachment E does not specify how the public may participate in the rate review proceeding." The final three paragraphs of Attachment E set forth how the public may participate, using the language directed by the Commission's Regulation No. 8720, Section 2.18(C), (D), and (E). PREPA respectfully asks the Commission to clarify its order by indicating that there is not a deficiency on this item.

5. The June 13<sup>th</sup> Order states in part: "Schedules do not contain dates of preparation/filing." Each Schedule was filed on May 27, 2016, and the Schedules generally were finalized on May 26 or May 27, 2016. Finalization of the Schedules included finalizing the content as well as the form of the Schedules (such as adding /revising headers and adding Bates numbers as well as creating .pdf versions when possible and dealing with Excel versions). PREPA seeks leave to file an informative Table that shows, as to each Schedule, the date on which the preparation of the Schedule was completed, and the filing date of May 27, 2016. PREPA respectfully proposes the Table as a substitute to preparing and filing a new version of each Schedule, which also, presumably, would involve the labor of re-posting all of the Schedules. Providing a Table would be more efficient and would avoid potential confusion about postings. Alternatively, because the dates nearly all will be May 26 or May 27, 2016, PREPA asks that the Commission waive this item.

6. The June 13<sup>th</sup> Order, with respect to agreements with bondholders, states in part that "redacted pages were included". None of the body of any agreement was redacted. Certain signature block information was redacted because it included confidential information about the



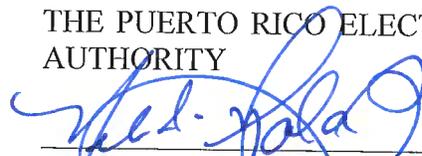
holdings of the particular signatories that PREPA is contractually required to treat as confidential. This information also is inherently confidential financial information. Further, the individual financial information is not relevant to this case. PREPA respectfully requests that the Commission approve the use of these redactions.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Commission grant this Motion, clarify the requirement as to Schedule D-1, clarify that there is not a deficiency as to the draft Public Notice, authorize use of a Table as discussed above, and approve the redactions of confidential financial information.

Dated: June 17, 2016

Respectfully submitted,

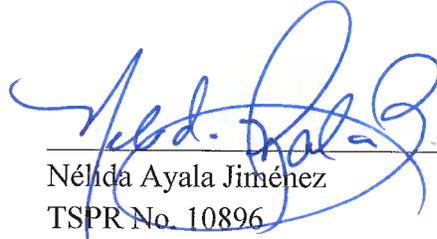
THE PUERTO RICO ELECTRIC POWER  
AUTHORITY



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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 June 17, 2016.



Néida Ayala Jiménez

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