COMMONEALTH OF PUERTO RICO
PUERTO RICO ENERGY COMMISSION

IN RE: PUERTO RICO ELECTRIC POWER AUTHORITY RATE REVIEW	**CASE NO.:** CEPR-AP-2015-0001 **SUBJECT:** Discovery confidentiality requests.

RESOLUTION AND ORDER

As part of its responses to the information requests of the Puerto Rico Energy Commission ("Commission"), the Puerto Rico Electric Power Authority ("PREPA") filed certain information and documents for which it requested confidentiality treatment. Pursuant to the requirements established by the Commission to such effect, PREPA filed the corresponding memorandums of law where it stated the arguments and legal grounds in support of its request for confidentiality.[1]

The information and documents for which PREPA requested confidentiality, as well as the grounds in support of its request and the Commission's decision on each claim, are detailed below.

A. Trade Secrets

Act 80-2011[2] requires PREPA to demonstrate that the information it deems a trade secret has a real or potential independent economic value, or that the information provides a competitive advantage since such information is not readily accessible to the public. Through the discovery process PREPA requested confidentiality treatment to certain documents and information based on trade secrets claims.

1. 4th Requirement of Information[3]

PREPA requested confidentiality treatment for the answers to questions **CEPR-PC-01-16, CEPR-SGH-02-08, CEPR-SGH-02-05 and CEPR-PC-01-47.** In specific, in its answer to question **CEPR-PC-01-16**[4]**,** PREPA filed a document which it argues has confidential information related to the power purchase agreements between PREPA and several energy generation companies, including the prices paid for fuel during several fiscal years. PREPA claims that the information included has an independent commercial value, since it identifies

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[1] Section 1.15 of Regulation No. 8720, New Regulation on Rate Filing Requirements or the Puerto Rico Electric Authority's First Rate Case.
[2] Industrial and Trade Secret Protection Act of Puerto Rico, as amended.
[3] 4th Requirement of Information sent to PREPA on July 15, 2016.
[4] PREPA Response to EC Staff CEPR-PC-01-16_Attach 01.xlsx

the trends and changes in the energy market, and provides PREPA with historical references, which could help them in future negotiations. PREPA stated that the publication of such information compromises their ability to secure reasonable prices, since the competitors could artificially raise their fees, to the point of not being economically viable for PREPA.

Also, PREPA expressed that the answer to question **CEPR-SGH-02-08**[5], and its attachment, have confidential information related to PREPA's subsidiaries. Specifically, PREPA expressed that such information includes trade secrets with independent value, since it details sensitive information related to such companies, which is not public knowledge and may be used against it to reduce or eliminate their competitive advantage in the market. PREPA adds that the documents contain information of financial nature, which it argues, it's not publicly available, and therefore requests for it not to be published.

Furthermore, with regards to question **CEPR-SGH-02-05**[6]**,** PREPA supports its confidentiality claim by stating that such answer includes information with regards to PREPA's obligations with its bondholders and other financial forecasts. PREPA claims that the document includes models that are intellectual property of its creators, which has an independent economic value since they use such model to differentiate their services.

Finally, PREPA requests confidentiality treatment for the information provided for question **CEPR-PC-01-47**[7]**.** Nevertheless, PREPA did not file any legal arguments or basis to support its request.

2. 5th Requirement of Information[8]

PREPA requested confidentiality treatment for the document presented in response to questions **CEPR-PC-02-20**[9] and **CEPR-PC-02-21**[10]**.** PREPA argues that such document includes trade secrets, since it includes data with regards to the hourly load and specific information about its clients. PREPA also argues that such information is not easily accessible to the public. It adds that it includes information about several of its clients, which are under specific rates and its publication may put at risk their privacy and the business relationship between PREPA and these clients.

With regards to the information provided in response to question **CEPR-RS-02-11**[11], PREPA included two presentations and requested that certain personal information about its clients, negotiations or discussions with certain individuals and entities, analysis and implementation of several vulnerability areas, be redacted. The basis for its request is that the publication of such information may compromise its relations with its clients and affect

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[5] PREPA Response to EC Staff CEPR-SGH-02-08_Attach 01 (CONFIDENTIAL).pdf
[6] PREPA Response to EC Staff CEPR-SGH-02-05_Attach 01 (CONFIDENTIAL).xlsx
[7] PREPA Response ROI DRR CEPR-PC-01-47_Attach 02 (CONFIDENTIAL).xlsx
[8] 5th Requirement of Information sent to PREPA on July 21, 2016.
[9] PREPA Response ROI DRR CEPR-PC-02-020_Attach 01 (CONFIDENTIAL).xlsx
[10] *Id.*
[11] 160316 RA Presentation_Redacted.pdf; 160609 RA Presentation_Redacted.pdf

negotiations. Also, PREPA argues that the information with regards to its operational vulnerabilities may be exploited to its detriment and that of its customers. PREPA also requested the confidentiality for the information included in its response to question **CEPR-RS-02-01**[12], which incorporates copies of different customer's bills, for which PREPA redacted the personal information of each client.

Finally, PREPA requested confidentiality of certain names in their response to question **CEPR-PC-02-32**[13]**.** However, PREPA did not file a legal argument to support its request.

3. 6th Requirement of Information [14]

In its 6th Requirement of Information, PREPA requested confidentiality of certain documents and information filed in response to questions **CEPR-PC-04-45**[15]**, CEPR-JF-01-11**[16]**, CEPR-JF-01-14**[17]**, CEPR-JF-01-16**[18]**, CEPR-JF-01-23**[19] and **CEPR-PC-04-21**[20]**.** PREPA argues that such information should be considered trade secrets since it includes specific information about its clients, about its operational and sales processes, fuel forecasts and system outages, among others. PREPA also expressed that it contains specific information with regards to its generation facilities, including fuel prices, forecast for the improvement plans in fuel and energy procurement, and information concerning load and fuel purchase agreements.

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[12] PREPA Response ROI DRR CEPR-RS-02-01_Attach01-7of7.pdf; PREPA Response ROI DRR CEPR-RS-02-01_Attach02-7of7.pdf; PREPA Response ROI DRR CEPR-RS-02-01_Attach03-7of7.pdf PREPA Response ROI DRR CEPR-RS-02-01_Attach04-7of7.pdf; PREPA Response ROI DRR CEPR-RS-02-01_Attach05-7of7.pdf; PREPA Response ROI DRR CEPR-RS-02-01_Attach06-7of7.pdf; PREPA Response ROI DRR CEPR-RS-02-01_Attach07-7of7.pdf

[13] 160819 PREPA Responses to 5th ROI (CONFIDENTIAL).pdf

[14] 6th Requirement of Information sent to PREPA on July 29, 2016.

[15] PREPA Response ROI DRR CEPR-PC-04-45_Attach 01 (CONFIDENTIAL).xlsx

[16] PREPA Response ROI DRR CEPR-JF-01-11_Attach 01 (CONFIDENTIAL).pptx

[17] PREPA Response ROI DRR CEPR-JF-01-14_Attach 14 (CONFIDENTIAL).pptx

[18] PREPA Response ROI DRR CEPR-JF-01-16_Attach 01 (CONFIDENTIAL).pdf

[19] PREPA Response ROI DRR CEPR-JF-01-23_Attach 02 (CONFIDENTIAL).pptx

[20] PREPA Response ROI DRR CEPR-PC-04-21_Attach 01 (CONFIDENTIAL).xlsx

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4. 7th Requirement of Information[21]

Finally, PREPA requested confidentiality of the answers to questions **CEPR-AH-03-01**[22], **CEPR-AH-03-07**[23] and **CEPR-AH-03-08**[24] which include fuel and energy adjustment formulas, reports with information about generation and service proposals for construction and future consultant services.

After examining PREPA's arguments in support of its requests, the Commission **GRANTS** the confidentiality claims for the answers to the following questions: *CEPR-PC-01-16; CEPR-SGH-02-05; CEPR-PC-02-20; CEPR-PC-02-21; CEPR-RS-02-01; CEPR-SGH-02-08; CEPR-PC-04-45, CEPR-JF-01-11, CEPR-JF-01-14, CEPR-JF-01-16, CEPR-JF-01-23; CEPR-PC-04-21; CEPR-AH-03-01, CEPR-AH-03-07 and CEPR-AH-03-08.*

With regards to the presentations filed as an answer to question **CEPR-RS-02-11**, the Commission **GRANTS** the redactions as requested for document *160609 RA Presentation_Redacted.pdf.* Nevertheless, the Commission **DENNIES** the redactions requested in document 160316 *RA_Presentation_Redacted.pdf*, and **APPROVES** a modified version. Such modified version will be shared initially with PREPA, and afterwards it will be published in a period of thirty (30) days after the notification date of this Resolution and Order, pursuant to the dispositions of the August 31, 2016 Resolution in Case No. CEPR-MI-2016-0009.

The Commission **DENIES** the confidentiality requests for the responses to questions **CEPR-PC-01-47** and **CEPR-PC-02-32** since PREPA did not file a memorandum expressing the legal arguments that support its request. The mere identification of a document as confidential does not automatically grant a protection or privilege with regards to such document and/or information. It is PREPA's responsibility to present to the Commission the basis for its claim, which it didn't do.

B. CEII

PREPA argued that certain information and/or documents filed as part of their responses should be considered as Critical Energy Infrastructure Information ("CEII"). PREPA based its claims in the Critical Infrastructure Protection Act of 2001,[25] the definition

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[21] 7th Requirement of Information sent to PREPA on August 12, 2016.

[22] PREPA Response ROI DRR CEPR-AH-03-01 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-AH-03-01_Attach 02 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-AH-03-01_Attach 03 (CONFIDENTIAL).pdf

[23] PREPA Response ROI DRR CEPR-AH-03-07_Attach 02 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-AH-03-07_Attach 03 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-AH-03-07_Attach 04 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-AH-03-07_Attach 05 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-AH-03-07_Attach 06 (CONFIDENTIAL).xlsx

[24] PREPA Response ROI DRR CEPR-AH-03-08_Attach 13 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-AH-03-08_Attach 14 (CONFIDENTIAL).pdf

[25] Title X, Section 1016, P.L. 107-59.

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of "security" of the Presidential Policy 21 and the definition of "critical infrastructure" of the Department of Homeland Security ("DHS") adopted by the Commission on April 5, 2016.[26] Based on this, PREPA argued that the information included in those documents was the type of information that ordinarily would be considered CEII since it refers to security, stability and reliability of the electric system. Specifically, PREPA requested confidentiality treatment to the information provided for the following responses.

1. 5th Requirement of Information[27]

PREPA requested confidentiality for the responses to questions **CEPR-PC-02-25**[28], **CEPR-PC-02-26**[29] and **CEPR-PC-02-27**[30], since those documents referred to PREPA's transmission system throughout Puerto Rico. PREPA also requested confidentiality for the information provided in response to the question **CEPR-PC-02-28**[31] which includes information about certain electrical components interconnected to Puerto Rico's electric system. In addition, PREPA requested confidentiality treatment for certain information provided as response of questions **CEPR-PC-02-30**[32], **CEPR-PC-02-39**[33] and **CEPR-PC-02-40**[34], which include information about the distribution system and PREPA's feeders.

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[26] *See Resolution and Order, PREPA's Confidentiality Claims*, CEPR-AP-2015-0002, at page 7, April 5, 2016, where the Commission adopted as policy the definition of "security" as defined in 42 U.S.C.A. § 5195(e) and the definition of "critical infrastructure information" as defined in 6 U.S.C.A. § 131(3).

[27] *Id.*

[28] PREPA Response ROI DRR CEPR-PC-02-025_Attach 01.pdf

[29] PREPA Responses to EC Staff 5th ROI.pdf

[30] PREPA Response ROI DRR CEPR-PC-02-027_Attach 01 (CONFIDENTIAL).xlsx.

[31] PREPA Response ROI DRR CEPR-PC-02-028_Attach 01 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 02 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 03 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 04 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 05 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 06 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 07 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 08 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 09 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 10 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 11 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 12 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 13 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-PC-02-028_Attach 14 (CONFIDENTIAL).pdf.

[32] PREPA Response ROI DRR CEPR-PC-02-030_Attach 01 (CONFIDENTIAL).xlsx; PREPA Response ROI DRR CEPR-PC-02-030_Attach 02 (CONFIDENTIAL).pdf; 160819 PREPA Responses to 5th ROI (CONFIDENTIAL).pdf.

[33] GIS System Information

[34] *Id.*

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2. 6th Requirement of Information[35]

PREPA requested confidentiality for certain documents and information provided in response to questions **CEPR-AH-02-05**[36] and **CEPR-JF-01-13**[37]. In its memorandum of law PREPA argued that such documents contain information about PREPA's distribution projects and generation stations. For both claims, PREPA asserted that such information is critical infrastructure information which, if published, may compromise the security of Puerto Rico's electrical system.

After examining the arguments presented by PREPA, the Commission **GRANTS** the confidentiality requests for the responses to the following questions: *CEPR-PC-02-25; CEPR-PC-02-26; CEPR-PC-02-27; CEPR-PC-02-28; CEPR-PC-02-30; CEPR-PC-02-39; CEPR-PC-02-40; CEPR-AH-02-05 and CEPR-JF-01-13.*

3. 7th Requirement of Information[38]

As part of PREPA's response to question **CEPR-JF-02-03**[39], it filed certain documents that were also filed before the Commission in the Integrated Resources Plan ("IRP") process[40]. In its memorandum of law PREPA requested the Commission to grant the same treatment to such documents in this proceeding, as the one granted in the IRP process. PREPA restated its argument that such documents include information about reliability studies, which are considered critical infrastructure information. Therefore, PREPA requests that the same directives issued by the Commission in the IRP be applied in this case:

> every authorized representative that request information that the Commission has classified as "critical infrastructure information" shall: (1) certify that it has signed the Non-Disclosure Agreement and that it is an authorized representative of an intervenor; (ii) review the documents at PREPA's offices; and (iii) agree not to bring any recording device to the room where the documents are to be reviewed. Authorized representatives [that] review these documents may take notes, nevertheless they may not photocopy, trace, record by electronical mediums or otherwise reproduce part or all of the same.[41]

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[35] 6th Requirement of Information sent to PREPA on July 29, 2016.
[36] PREPA Response ROI DRR CEPR-AH-02-05 SUPP_Attach 02 (CONFIDENTIAL).xlsx
[37] PREPA Response ROI DRR CEPR-JF-01-13_Attach 01 (CONFIDENTIAL).accdb; PREPA Response ROI DRR CEPR-JF-01-13_Attach 02 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-JF-01-13_Attach 03 (CONFIDENTIAL).xlsx
[38] 7th Requirement of Information sent to PREPA on August 12, 2016.
[39] PREPA Response ROI DRR CEPR-JF-02-03_Attach 01 (CONFIDENTIAL).pdf; PREPA Response ROI DRR CEPR-JF-02-03_Attach 01 (CONFIDENTIAL).pdf
[40] CEPR-AP-2015-0002.
[41] April 21, 2016 Resolution and Order Case No. CEPR-AP-2015-0002.

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After reviewing PREPA's arguments, the Commission **GRANTS** its petition as requested. Intervenors will have access to such information in the Commission's Clerk's Office[42] and/or at PREPA's offices, by prior appointment, and pursuant to the dispositions of Resolution CEPR-MI-2016-0009.

Any intervenor that wishes to access the documents designated as confidential under the trade secrets or CEII doctrines, shall sign and return to the Commission the Non-Disclosure Agreement provided by the Commission through Resolution CEPR-MI-2016-0009. The access to such documents and confidential information will be granted according to the processes established in such resolution.

PREPA shall have a continuing obligation to update any information it deems confidential to eliminate any claim applicable to information which, due to the passing of time or because of its voluntary disclosure, no longer warrants confidential treatment. As such, PREPA is **ORDERED** to, from time to time, update its document logs and disclose any information which it deems no longer warrants confidential treatment.

Any party adversely affected by this Resolution and Order may file a motion for reconsideration before the Commission, pursuant to Section 11.01 of Regulation 8543 and the applicable provisions of Act No. 170 of August 12, 1988, as amended, known as the Uniform Administrative Procedure Act (UAPA). Said motion must be filed within twenty (20) days from the date in which copy of the notice of this Resolution and Order has been filed. Said motion must be filed at the Commission Clerk's Office. Copy of the motion as filed must be sent by email to all the parties notified of this Resolution and Order within the timeframe established herein.

The Commission shall have fifteen (15) days from the date in which said motion is filed to consider it. If the Commission rejects it forthright or fails to act upon it within said period of fifteen (15) days, the term to seek judicial review shall begin on the date in which the Commission notifies such denial or the date in which said fifteen (15) day expires, whichever occurs first. If the Commission considers the motion, the term to seek judicial review shall commence from the date a copy of the notice of the Commission's resolution definitively resolving the motion for reconsideration is filed. Such resolution shall be issued and filed within ninety (90) days after the motion for reconsideration has been filed. If the Commission's considers the motion for reconsideration but fails to take any action with respect to such motion within ninety (90) days of its filing, it shall lose jurisdiction to consider it and the term to seek judicial review shall commence upon the expiration of said ninety (90)-day term, unless the Commission, for just cause and within those ninety (90) days, extends the term to resolve for a period that shall not exceed thirty (30) days.

In the alternative, any affected party may file a petition for review before the Court of Appeals within a term of thirty (30) days from the date a copy of the notice of this Resolution and Order was filed in the record of the Commission. This in accordance with Section 11.03

[42] The Commission's Clerk's Office is located at 268 Ave. Muñoz Rivera, Plaza Level Suite 202, San Juan, PR 00918.

of Regulation No. 8543, the applicable dispositions of UAPA and the rules and regulations of the Court of Appeals.

For the benefit of all the parties involved, the Commission issues this Resolution and Order in both Spanish and English languages. Should any conflict between each version arise, the English version shall prevail.

Be it notified and published.

Agustín F. Carbó Lugo
Chairman

Ángel R. Rivera de la Cruz
Associate Commissioner

José H. Román Morales
Associate Commissioner

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Commission has so agreed on October 5, 2016. I also certify that on this date a copy of this Resolution and Order was notified by electronic mail to the following: n-ayala@aeepr.com, c-aquino@aeepr.com, glenn.rippie@r3law.com, michael.guerra@r3law.com, john.ratnaswamy@r3Law.com, codiot@opic.pr.gov, jperez@oipc.pr.gov, cfl@mcvpr.com, ivc@mcvpr.com, mmuntanerlaw@gmail.com, jfeliciano@constructorespr.net, abogados@fuerteslaw.com, jose.maeso@aae.pr.gov, edwin.quinones@aae.pr.gov, nydinmarie.watlington@cemex.com, aconer.pr@gmail.com, epenergypr@gmail.com, jorgehernandez@escopr.net, ecandelaria@camarapr.net, pga@caribe.net, manuelgabrielfernandez@gmail.com, mreyes@midapr.com, agraitfe@agraitlawpr.com, mgrpcorp@gmail.com, attystgo@yahoo.com, maribel.cruz@acueductospr.com and eirizarry@ccdlawpr.com.

María del Mar Cintrón Alvarado
Clerk

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I certify that this is a true and exact copy of the Resolution and Order issued by the Puerto Rico Energy Commission. I further certify that today, October ___, 2016, I have proceeded with the filing of the Resolution and Order and I have sent a copy thereof to:

Puerto Rico Electric Power Authority
Attn.: Nélida Ayala Jiménez
Carlos M. Aquino Ramos
P.O. Box 363928
Correo General
San Juan, PR 00936-4267

Rooney Rippie & Ratnaswamy LLP
E. Glenn Rippie
John P. Ratnaswamy
Michael Guerra
350 W. Hubbard St., Suite 600
Chicago Illinois 60654

Oficina Independiente de Protección al Consumidor
p/c Lcdo. José A. Pérez Vélez
Lcda. Coral M. Odiot Rivera
268 Hato Rey Center
Suite 524
San Juan, Puerto Rico 00918

Sunnova Energy Corporation
p/c McConnell Valdés, LLC
Lcdo. Carlos J. Fernández Lugo
Lcdo. Ignacio J. Vidal Cerra
PO Box 364225
San Juan, Puerto Rico 00936-4225

Autoridad de Acueductos y Alcantarillados de Puerto Rico
p/c Lcda. Maribel Cruz De León
PO Box 7066
San Juan, Puerto Rico 00916

Autoridad Acueductos y Alcantarillados de Puerto Rico
Lcdo. Pedro Santiago Rivera
305 Calle Villamil, 1508
San Juan, Puerto Rico 00907

Asociación de Constructores de Puerto Rico
p/c Lcdo. José Alberto Feliciano
PO Box 192396
San Juan, Puerto Rico 00919-2396

Centro Unido de Detallistas, Inc.
Lcdo. Héctor Fuertes Romeu
PMB 191 – PO Box 194000
San Juan, Puerto Rico 00919-4000

CEMEX de Puerto Rico, Inc.
Lcdo. Edwin A. Irizarry Lugo
CCD Law Group, P.S.C.
712 Ave. Ponce de León
San Juan, Puerto Rico 00918

CEMEX de Puerto Rico, Inc.
p/c Enrique A. García
Lcda. Nydin M. Watlington
PO Box 364487
San Juan, Puerto Rico 00936-4487

Asociación de Consultores y Contratistas de Energía Renovable de Puerto Rico
p/c Edward Previdi
PO Box 16714
San Juan, Puerto Rico 00908-6714

Energy & Environmental Consulting Services Corp.
Jorge Hernández, PE, CEM, BEP
560 C/ Aldebarán, Urb. Altamira
San Juan, Puerto Rico 00920

Cámara de Comercio de Puerto Rico
p/c Eunice S. Candelaria De Jesús
PO Box 9024033
San Juan, Puerto Rico 00902-4033

Asociación de Industriales de Puerto Rico
p/c Manuel Fernández Mejías
2000 Carr. 8177, Suite 26-246
Guaynabo, Puerto Rico 00966

Cámara de Mercadeo, Industria y Distribución de Alimentos
p/c Lcdo. Manuel R. Reyes Alfonso
#90 Carr. 165, Suite 401
Guaynabo, Puerto Rico 00968-8054

Instituto de Competitividad y sostenibilidad Económica de Puerto Rico
p/c Lcdo. Fernando E. Agrait
701 Ave. Ponce de León
Edif. Centro de Seguros, Suite 401
San Juan, Puerto Rico 00907

Oficina Estatal de Política Pública Energética
p/c Ing. José G. Maeso González
Lcdo. Edwin J. Quiñones Porrata
P.O. Box 41314
San Juan, Puerto Rico 00940

Asociación de Hospitales de Puerto Rico
p/c Lcda. Marie Carmen Muntaner Rodríguez
470 Ave. Cesar González
San Juan, Puerto Rico 00918-2627

Grupo Windmar
p/c Lcdo. Marc. G. Roumain Prieto
1702 Ave. Ponce de León, 2do Piso
San Juan, Puerto Rico 000909

For the record, I sign this in San Juan, Puerto Rico, today, October ___, 2016.

_____
Jessica Fuster Rivera
Clerk of the Puerto Rico
Telecommunications Regulatory Board