

COMISIÓN DE ENERGÍA DE PUERTO RICO  
#500 Calle Roberto H. Todd  
Parada 18 Santurce, PR

COMISIÓN DE ENERGÍA DE PUERTO RICO	
Recibido por:	<i>Aracely Torres</i>
Fecha:	<i>19/3/16</i>
Hora:	<i>1:15 PM</i>

**IN RE: PETITION FOR APPROVAL OF TRANSITION  
ORDER FILED BY THE PREPA REVITALIZATION  
CORPORATION**

CASE NO: CEPR-AP-2016-0001

**MOTION IN COMPLIANCE WITH RESOLUTION AND ORDER**

COME NOW, PVP Properties, Inc., Coto Laurel Solar Farm, Inc., Windmar PV Energy, Inc., and Windmar Renewable Energy, Inc. (collectively, "WindMar Group") , through the undersigned legal counsel, respectfully state and pray:

Pursuant to the Puerto Rico Energy Commission's Resolution and Order issued May 17, 2016, WindMar Group confirms its participation in both the Pre-Hearing Conference and the Technical Hearing for the evaluation of the Petition for Approval of Transition Order Filed by the PREPA Revitalization Corporation ("Petition"). Furthermore the Commission ordered intervenors to; (1) express any objections or questions related to the procedures, (2) identify the witnesses to whom they anticipate to ask questions, (3) confirm who will be their witnesses for panel eight, (4) identify who will be their legal representatives during Panel nine, and (5) the topics and issues to be addressed as well as who will be in charge for questioning witnesses during all other panels.

WindMar Group confirms its participation and has no objections or questions about the procedures. During the Hearing, it expects to ask the PREPA Revitalization Corporation "Corporation", and if possible this Honorable Commission, questions.

WindMar Group has chosen their President, Victor Luis Gonzalez, as their witness for panel eight (8) and Marc Roumain as their legal representative for panel nine (9).

The topics and issues to be addressed on behalf of WindMar Group are expected to be; the proposed criteria for distributing financing costs among customer classes, why the Corporation proposes to penalize low-consumption clients, the reasons for not proposing a consumption based rate where those with larger consumption contribute a larger payment, reasons for penalizing clients that have decided to produce their own energy from renewable sources, cost causation with respect to renewables benefits to the grid, and information relevant to customer consumption in order to structure an acceptable payment structure. Victor Luis Gonzalez will be in charge of questioning witnesses.

I hereby certify that this Motion was notified on this date via email to the following:

**Corporación para la Revitalización de la Autoridad de Energía Eléctrica**

Quiñones & Arbona, PSC  
Edwin Quiñones  
Víctor D. Candelario-Vega  
Giselle M. Martinez-Velazquez  
Richard Hemphill Cabrera  
PO Box 10906  
San Juan, PR 00922  
[equinones@qalawpr.com](mailto:equinones@qalawpr.com)

**Dr. Guillermo M. Riera, P.R.**  
Urb. Estancias Reales  
C/ Príncipe Guillermo 14 7  
Guaynabo, PR 00969  
[guillermo.m.riera@gmail.com](mailto:guillermo.m.riera@gmail.com)

**Rooney Rippie & Ratnaswamy, LLP**

E. Glenn Rippie  
Michael Guerra  
Mario E. Dominguez  
Kingsbury Center, Suite 600  
350 West Hubbard Street  
Chicago, Illinois 60654  
[glenn.rippie@r3law.com](mailto:glenn.rippie@r3law.com)

**Instituto de Competitividad y Sostenibilidad  
Económica de Puerto Rico**

p/c Lcdo. Fernando E. Agrait  
701 Avenida Ponce de Leon, Oficina 414  
San Juan, PR 00907  
[agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com)

**Oficina Estatal de Política Publica Energética**

Lcdo. Edwin J. Quiñones Porrata  
P.O. Box 41314  
San Juan, PR 00940  
[edwin.quinones@aae.pr.gov](mailto:edwin.quinones@aae.pr.gov)

**Decentricity, Inc.**

Fiddler, Gonzalez & Rodriguez, PSC  
Lcda. Alicia P. Perez Caballero  
PO Box 363507  
San Juan, PR 00936  
[aperez@fgrlaw.com](mailto:aperez@fgrlaw.com)

**Gas Natural Puerto Rico, Inc.**


Fiddler, Gonzalez & Rodriguez, PSC  
Lcda. Melissa Hernandez Carrasquillo  
PO Box 363507  
San Juan, PR 00936  
[mhernandez@fgrlaw.com](mailto:mhernandez@fgrlaw.com)

**Oficina Independiente de Protección al Consumidor**

Lcda. Coral M. Odio Rivera  
268 Hato Rey Center

Suite 504  
San Juan, PR 00918  
[codiot@oipc.pr.gov](mailto:codiot@oipc.pr.gov)

Respectfully submitted this 19<sup>th</sup> day of May, 2016.

Por:   
\_\_\_\_\_  
Marc G. Roumain Prieto  
NUM RUA: 16,816

Roumain & Associates, P.S.C.  
#1702 Avenida Ponce De Leon  
2ndo Piso  
San Juan, Puerto Rico 00909  
787-349-9242  
Email: mgrpcorp@gmail.com