

COMISIÓN DE ENERGÍA DE PUERTO RICO	
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IN RE: PETITION FOR APPROVAL OF TRANSITION
ORDER FILED BY THE PREPA REVITALIZATION
CORPORATION

CASE NO: CEPR-AP-2016-0001

Final Brief of Intervenor WindMar Group

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:

On May 24th through the 27th, 2016 WindMar Group participated in the Technical Conference held regarding the Petition for Approval of Transition Order Filed by the PREPA Revitalization Corporation ("the Petition"). WindMar Group's hopes are that its testimony given at the aforementioned Conference and the information and that provided in this brief assist the Commission's final decision regarding the Transition Charge.

Analysis of the Revitalization Act's Dispositions Regarding Behind The Meter Generation

Puerto Rico's Act No. 4-2016 known as the Electric Power Authority Revitalization Act ("Revitalization Act"), among other dispositions, provides legal framework for the Transition Charge and details how it shall be petitioned and evaluated.

Comisión de Historia y Monumentos
Resolución No. _____
Fecha: _____

En la ciudad de Bogotá, D.C., a los _____ días del mes de _____ del año 19____.

El suscrito, _____, en su calidad de _____, por el presente hace saber a usted que _____.

En consecuencia, se le recomienda _____.

Atentamente,

Section 20 of the Revitalization Act amends Section 6.25A of Act No. 57-2014 requiring, in its subsection 6.25A(b), the Corporation to submit a Petition to the Commission requesting it to issue a Restructuring Order and the details of the information to be included in the Petition and the Restructuring Order.

With respect to behind the meter generation, Section 6.25A as amended states that the clauses of the Restructuring Resolution, including the calculation methodology for the Transition Charges and the Adjustment Mechanism, be consistent with the criteria provided in Subsection 6.25A(d) of the same Section.

Subsection 6.25A(d) enumerates the “criteria to allocate the Financing Costs among the Customer classes and to calculate and adjust the Transition Charge” and in its fourth numbered criteria states;

*“(4) When calculating Customer’s energy usage under paragraphs (1) and (2) of this subsection (d), the Corporation **may choose** to include the estimated load served by net metering or distributed generation (‘behind the meter’), **if the methodology for such an inclusion is practical to administer, and would ensure the full and timely payment of the Restructuring Bonds in accordance with the terms thereof and other Ongoing Financing Cost.**”*

This disposition concedes the Corporation the authority to choose whether to include the estimated load of either net metering or distributed generation. This distinction between; 1) net metering or 2) other distributed generation is important because net metering is an optional program offered exclusively to renewable energy sources under Act 114-2007 and the law treats all other distributed generation, whether from a renewable energy source or not, separately. This distinction is necessary to understand the amendments made to Article 4 of Act 114-2007 that we will discuss further within this brief.

Next, the Section states that the authorization provided for the Corporation to “choose” is not absolute and its methodology must meet two criteria. The first being that it be “practical to administer” and the second that it “would ensure the full and timely payment of the Restructuring bonds...”.

Subsection 6.25A(e) which details that the Corporation’s request must include a Restructuring Resolution and lists the information to be included among which in Subsection (vi) states;

*(vi) the Corporation's determination of **whether it shall include the estimated load served by net metering or estimated distributed generation ('behind the meter')** in determining energy usage in accordance with subparagraphs (i), (ii), and (iii) of this subsection (e)(1) and in the Adjustment Mechanism. If the Corporation determines to include the estimated net metering or estimated distributed generation in determining energy usage in accordance with subparagraphs (i), (ii), and (iii) of this subsection (e)(1), **an explanation of the reasons and the determination (with its corresponding justification) stating that the administration of the resulting Transition Charge shall be practicable and that the resulting Transition Charge shall ensure full and timely payment of the Restructuring Bonds in accordance with the terms thereof and other Ongoing Financing Costs, during the effective term of the Restructuring Bonds;***

Clearly a justification is required by this disposition. It is our opinion that this subsection, as well as the previous one mentioned, detail the conditions and require justification not simply as a procedural requirement, but rather as substantive prerequisite to be evaluated and justified before this Honorable Commission.

Analysis of the Petition Regarding Behind the Meter Generation

On April 7, 2016 the Puerto Rico Electric Power Authority Revitalization Corporation (the “Corporation”) filed its Verified Petition for Restructuring Order (the “Petition”). Such

Petition explicitly details its application of each Criterion of Article 6.25A(d). In relation to Subsection 6.25(d)(ii)(4) and behind the meter generation, beginning on page 29 Sections 38 through 43 and later Sections 59 through 62 on pages 37 through 39, the Petition states the Corporation's determination with respect to behind the meter generation and attempts to prove it meets the Revitalization Act's requirements detailed above.

Following we include a verbatim copy of those Sections of the Petition that should be reviewed by the Commission prior to making a determination regarding behind the meter generation.

"38. The Calculation Methodology reflects the Corporation's determination that net-metering Customers and Customers using behind the meter generation should not be allowed to bypass Transition Charges to the extent their net load is less than their gross load and that, therefore behind the meter generation should not be an opportunity to bypass or avoid the applicability of Transition Charges. Therefore, the Calculation Methodology (Appendix 2 to Attachment 1.00) defines "Actual kWh Billed," for this purpose, "without regard to any offset for net-metering and adjusted for estimated distributed generation usage." Initially, that amount will be measured without any subtraction for the amount of electricity generated "behind the meter" and exported to the grid, and will reflect electricity flowing to the customer on PREPA facilities. As it becomes practicable, and as meter data measuring the output of the distributed generation itself becomes available, the load of such customers for these purposes will include the gross output of the distributed generation plus the net deliveries from PREPA. If the estimated load served by net metering and distributed "behind the meter" generation were not included, a Customer could reduce its responsibility to pay Transition Charges, and the responsibility for those avoided charges would be transferred inequitably to other Customers. Further explanation and support for this determination is provided by Corporation witness Ralph Zarumba (Corporation Ex. 6.00)."

*" 42. Finally, the Corporation has determined that Customer usage for the purpose of calculating Transition Charges should reflect gross usage (without regard to net metered credits) and "behind the meter" usage, **insofar as practical**, and the Corporation proposes that Transition Charges be calculated and adjusted based on usage (kWh) measured in that manner. The Corporation has further determined that this approach will not render the resulting Transition Charges impracticable to administer and that the resulting Transition Charges will ensure the full and timely payment of the Bonds in accordance with their terms and all other Ongoing Financing Costs. PREPA can practically determine total load, including estimated load served by net metering and distributed generation, in the*

calculation of Transition Charges, as described above. Including such estimated load in the distribution of costs among Customer classes and the calculation of individual Customers' Transition Charges will not impair the collection of Transition Charges or the full and timely payment of the Bonds in accordance with their terms and all other Ongoing Financing Costs during the term of the Bonds."

*"59. ... If the Corporation determines to include estimated net metering or estimated distributed generation in determining energy usage in clauses (ii), (iii) and (iv) of paragraph (e)(1), **an explanation of the reasons and a determination (with its corresponding explanation) that this will not render the resulting Transition Charges impracticable to administer and that the resulting Transition Charges will ensure the full and timely payment of the Restructuring Bonds in accordance with their terms and all other Ongoing Financing Costs during the term of the Restructuring Bonds;***

The Restructuring Resolution meets this criterion."

We request the Commission determine that the part of the Petition regarding behind the meter generation and net metering is incomplete, falling short of meeting the legislature's intentions expressed in Section 20 of the Revitalization Act.

The language is clear. The Corporation must comply with the requirements to provide the analysis and the data it used to support its reasons for including behind the meter generation in the Transition Charge. Neither an acceptable explanation has been provided nor were any studies undertaken to support the Corporations determination.

The Corporation's only support for its determination to include private behind the meter generation in the Transition Charge is the "fairness" argument that *"...If the estimated load served by net metering and distributed "behind the meter" generation were not included, a Customer could reduce its responsibility to pay Transition Charges, and the responsibility for those avoided charges would be transferred inequitably to other Customers."*

The Corporation's argument that not charging Customers on behind the meter generation would transfer those charges "inequitably" to other Customers is irrelevant because public policy has determined to encourage renewable energy integration through incentives ranging from net-metering to cash rebates and renewable energy certificates, all of which represent a cost to one sector and an incentive to renewables.

The Law requires that "the resulting Transition Charge shall ensure full and timely payment of the Restructuring Bonds"; it does not address whether the charges are inequitable. Not including charges to net-metering and behind the meter customers doesn't impair the full and timely payment of the Restructuring Bonds, neither does the fact that some customers will not pay their bills; because other customers who do pay their bills will now see their bill increase by the Adjusting Mechanism to take care of any shortfall in the amount of funds required. Similarly, customers who install energy saving appliances or customers who go off-grid or disconnect transfer their Transition Charges to other customers. **Charging net-metering and behind the meter customers the Transition Charge upon their private generation is not relevant to ensuring the full and timely payment of the Restructuring Bonds.**

We must bring to this Honorable Commission's attention that the Corporation's explanation on how this charge will be administered is not feasible or practical and fails to meet the Revitalization Act's mandate of law. On this topic the Corporation states that *"Initially, that amount will be measured without any subtraction for the amount of electricity generated "behind the meter" and exported to the grid..."* which is not possible for any behind the meter generation except those participating in the net metering program. This because other behind the meter generating customers are not required to install meters

with bidirectional capacity. Additionally the Petition completely ignores the distinction between distributed generation and distributed generation with net-metering. Then the Petition states *“As it becomes practicable, and as meter data measuring the output of the distributed generation itself becomes available...”* openly accepting it is not *“practical to administer”* now as required by the Revitalization Act Section 6.25A(d)(4) and 6.25A(e)(vi). It is our understanding the legal mandate requires it to be *“practical to administer”* at the moment of the Restructuring Order and not be pending on a suspensive condition to occur at an undetermined and uncertain time in the future as proposed by the Corporation.

As far as the last sentence of Section 38 of the Petition, cited above, referring to Mr. Zarumba’s testimony as one that supports the Corporation’s determination, we must differ. Mr. Zarumba’s testimony during the Technical Hearing stated that he understood he was required to include behind the meter generation. His testimony does not pursue to justify a determination made by the Corporation.

Following are Sections 60 and 61 of the Petition, which are relevant to the fact the Corporation’s statements regarding renewables and behind the meter generation are incomplete and fail to meet the letter of the law;

60. The Corporation’s determination that the Transition Charges should be based on load including that served by net metering or estimated distributed generation (“behind the meter”), its determination that including estimated load served by net metering or estimated distributed generation will not render the resulting Transition Charges impracticable to administer, and its determination that the resulting Transition Charges will ensure the full and timely payment of the Bonds in accordance with their terms and all other Ongoing Financing Costs are confirmed by the testimony of Corporation witness Gerard Gil-Olazábal (Corporation Ex. 3.00). The proposed means of implementing that determination and the rationale for it are described in Section II.C, above. Corporation witness Ralph Zarumba (Corporation Ex. 6.00):

(1) confirms that the Calculation Methodology includes an estimate of load served by net metering or estimated distributed generation ("behind the meter") in determining energy usage in the calculations; (2) explains and supports the method for calculating Transition Charges for Customers with net metering or distributed generation, as included in the Restructuring Resolution; and (3) confirms that determination and the method of estimating the load served will not render the resulting Transition Charges impracticable to administer or interfere with the full and timely payment of the Bonds and all other Ongoing Financing Costs during the term of the Bonds.

Neither witness's Ralph Zarumba nor Gerard Gil-Olazabal have provided evidence of expertise on the subject of renewable energy distributed generation nor have they supported their testimonies by any substantive data, statistics or professional studies. Additionally, as previously stated, Mr. Zarumba clearly stated during his testimony at the Technical Hearing that he understood he was required to include distributed generation in his methodology.

62. Corporation witness Gerard Gil-Olazábal (Corporation Ex. 3.00) confirms the Corporation's determination that the Calculation Methodology is practicable to administer and ensures the full and timely payment of the Bonds in accordance with their terms and all other Ongoing Financing Costs during the term of the Bonds. Corporation witness Ralph Zarumba (Corporation Ex. 6.00) explains and supports this determination, testifying that: (1) the Calculation Methodology and the manner in which Ongoing Financing Costs are distributed among classes is practicable to administer, and (2) ensures the full and timely payment of the Bonds in accordance with their terms and other Ongoing Financing Costs.

Again both Gerard Gil-Olazabal and Ralph Zarumba's testimonies lack expertise to support the referred conclusions. During the Technical Hearing we all heard Dr. Quintana's intent to explain how behind the meter load could be read by the Authority. Even he, the Authority's Executive Director, struggled to provide an adequate answer. Therefore **we can only conclude that the Corporation is far from meeting the requirement of the law and determining that applying the Transition Charge is**

“practicable to administer” or demonstrate it will do anything to “ensure” the full and timely payment of the Bonds.

Analysis of Article 4 of Act 114-2007

The Petition briefly mentions article 29 of the Revitalization Act which amends Article 4 of Act 114-2007 only briefly in an attempt to avoid the subject. Following are Sections 40 and 41 of the Petition to illustrate this point;

“40. Article 29 of the Revitalization Act amends Section 4 of Act 114-2007 to provide that the Commission shall “... evaluate and determine which rates will be applied to the net metering customers, the Contribution in lieu of Taxes, Grants, Securitization, and Subsidies.” This provision must be interpreted and applied in the context of, and in harmony, with Article 6.25A and Article 35(i) of the Revitalization Act.”

We agree the provision “must be interpreted and applied in the context of, and in harmony, with Article 6.25A and Article 35(i) of the Revitalization Act”. Additionally, the provision should be read in the context of Act 114-2007 as a whole and Act 57-2014 as well.

“41. ... The Corporation believes that the resulting Transition Charges “will be just and ... will cover operational and administrative costs of network services that the consumer received with the Net Metering Agreement” and that the Transition Charge will “never will be excessive or established in such a way that it becomes an obstacle to the deployment of renewable energy projects.” Id....”

Section 41 simply copies the statute without sustaining the statement with any facts.

Section 29 of the Revitalization Act amends Article 4 of Act 114-2007 that establishes net metering for renewable energy. Act 114-2007 clearly excludes energy generation from any other source which is not renewable and is further limited to those renewable energy

sources which either are currently participating in the Authority's net metering program or those that file to participate in the net metering program.

Article 4 of Act 114-2007, prior to the above-mentioned amendment, restricted the Authority from limiting Customers access to net-metering by not allowing any further requirements be added "by regulation or any other means". The Article also prohibited the Authority to "charge an additional fee or increase the monthly rate for electric energy use" to any Customer who had chosen to interconnect a renewable energy source to the Authority. Certainly, this restraint would not allow the Authority to charge these Customers the Transition Charge or any other charge or fee.

Following is the prior Article from Act 114-2007;

Section 4.- Prohibition.-

The Electric Power Authority may not establish by regulation or by any other means, additional requirements to those provided in Section 2 of this Act. Neither may it charge an additional fee nor increase the monthly rate for electric energy use to the customer who chooses to connect his or her solar electric equipment or windmill or other source of renewable energy to the transmission and distribution system of this public corporation.

The amended article reads as follows;

"Section 4.- Allowed Charges.-

The Electric Power Authority may propose, as part of its rates, just and reasonable charges to its net metering customers. The Energy Commission shall evaluate said charges as part of the rate proposal of the Authority.

The Energy Commission shall evaluate and determine which charges shall apply to net metering customers, such as the Contribution In Lieu of Taxes, Securitization, Subsidies, and Grants. Both the Authority and the Commission shall take into account the following criteria when proposing and evaluating the net metering customer charges:

- i. **The charge to be billed shall be just and shall have the purpose of covering the operating and administrative expenses of the grid services that receives any customer that entered into a Net Metering Agreement. The grid services received by a net metering customer shall***

be clearly differentiated from the services that the Authority bills on a regular basis to all of its customers. .

ii. The charge shall never be excessive or established in such a manner as to constitute an obstacle to the implementation of renewable energy projects.

Any customer that has entered into a net metering agreement as of the approval of this Act or that is in the process of evaluating or developing a renewable energy project which shall be interconnected to the system of the Authority shall have a grace period of twenty (20) days, counted as of the approval of this Act, during which the charges approved by the Commission shall not be billed. Such grace period shall not apply to customers that increase the renewable energy system's capacity by up to a maximum of twenty percent (20%); however, this shall not apply to customers that exceed this increase, who shall begin to pay the charges approved by the Commission from the time the increase of the system's capacity is completed. For projects submitted from the period after the date of approval of this Act to the time the final charge for net metering projects is determined and published by the Commission, petitioners shall submit to the Authority, when filing the interconnection evaluation, a deposit in an amount equal to five cents (\$0.05) per watt of proposed AC capacity or two thousand dollars (\$2,000) for industrial customers, one thousand dollars (\$1,000) for commercial customers, and two hundred fifty dollars (\$250) for residential customers, whichever is less. Said deposit shall be reimbursed by the Authority within a period not to exceed thirty (30) days after the Interconnection Agreement has been entered into or after the Authority notifies an unfavorable evaluation for a project. In the event of a favorable evaluation, the petitioner shall have a term of two hundred seventy (270) days, counted from the receipt of the notice of the favorable evaluation, to complete the construction of the project and certify the facility. In the event that the project is not completed within the term provided, the petitioner shall lose the deposit. The money collected by the Authority on account of these deposits shall be covered into a special account to defray future expenses related to the evaluation of applications for interconnection. In the event that the project is completed within the established term, the twenty (20)-day grace period previously established shall apply to such agreements, and such period shall only be suspended in the event of an increase in the system's capacity. The money collected by the Authority on account of the payment of deposits shall not accrue interest.

The Authority may not bill additional charges or increase the monthly energy usage rate to any customer that chooses to connect a solar energy system, windmill, or other renewable energy source to the transmission and distribution system of this public corporation."

The amendment changes the absolute prohibition of applying new charges to net metering customers by allowing new charges and fees *if* they are "just and reasonable charges" and placing the responsibility of such judgement upon this Commission. Thus the legislature's intention to allow charges to net metering customers under certain

circumstances is evident. Still, it is just as unmistakable that the intention was not open to allow any charges be applied to net-metering customers nor was it to allow charges that could affect the integration of renewables. The mandate clearly states the Commission shall evaluate such charges under certain listed criteria to be taken into account by the Commission. The Criteria being the following:

First, the charge is required to be “just” and cover “the operating and administrative expenses” of the grid services that a customer that entered into a “Net Metering Agreement” receives. Surely, the Transition Charge covering “Legacy Debt” does not meet this criteria for it does not cover the “operating and administrative expenses of the grid services” received by these Customers. Legacy Debt can in no way be classified as being incurred for a grid service provided to net-metering clients covering operating and administrative expenses. Additionally, net-metering customers have been exempt from paying any charges on the energy they generate since 2007, a period throughout which the Authority has been accumulating debt, losing income and failing to meet its obligations.

Second, the letter of the law states “The charge shall never be excessive or established in such a manner as to constitute an obstacle to the implementation of renewable energy projects.” This limitation to any charge proposed upon a customer with net -metering is crystal clear; no charges that are “excessive” or “constitute an obstacle to the implementation of renewable energy projects” meet the criteria. Such criteria, dictated by our legislature, imposes an obligation on the Commission to take into account the potential effects of proposed charges upon future net-metering customers and the effects on implementation of distributed generation renewable energy projects in general. **There**

is no evidence on the Commission's record to support a determination that the Transition Charge does not "...constitute an obstacle to the implementation of renewable energy projects".

The Corporation was responsible for providing information to support their Petition and failed to do so. When proposing to apply the charge to behind the meter generation and net-metering customers, the Corporation had to provide evidence that the charge would not represent an obstacle to the implementation of renewable energy projects. On page 45 of the Corporation's brief, they admit their failure of providing evidence when stating "Currently, the administrative record of the instant case lacks any substantial evidence that could make this honorable Commission determine that that the Transition Charge could be an obstacle to the implementation of renewable energy projects". Their mistake being the absence of recognizing it was their responsibility to provide such evidence and trying to confuse the Commission into believing it was an Intervenor's responsibility.

The burden of proof undoubtedly lies upon the Petitioner. If WindMar Group had not intervened in this process, would the Corporation be exempt of complying with Article 29? Of course not. Now, one can only conclude that **given the fact that the burden of proof lies upon the Petitioner and the admission of absence of substantial evidence on the administrative record, as stated by the Corporation, signing the proposed Restructuring Order would be contrary to law.**

Additionally, WindMar Group, as an intervenor at the Technical Conference, and Victor Gonzalez, at the public hearing, provided information and presented evidence relevant to current photovoltaic costs and the impacts of approving the Transition Charge on net-metering. The Transition Charge represents a 20% on the cost of renewable energy. This

pushes a photovoltaic system over \$0.18 per kWh and the current rate is below that. Therefore making renewables more expensive than the utility. This is on record.

Last, the article provides a “grandfathering” of net-metering agreements existing prior to approval of the charge. Up to this date, the Authority has failed to provide a mechanism for making the deposit required by Section 29. Nor, is there any regulation or process in place for its implementation. Furthermore **there is no guarantee that the Restructuring Bonds will be issued. Their issuance depends on market conditions and debtors confidence. Restricting net-metering to continue once the Order is signed without knowing if the Transition Charge will occur is an unjustified burden that will constitute an obstacle to the implementation of distributed generation renewable energy.**

Even though this mandate is straight forward its application requires expertise on renewables, specifically on the Puerto Rico market. If the Commission evaluates the proposed charge and its effects on the implementation of distributed generation renewable energy, as required by Section 29, it can only conclude to reject the proposal made in the Petition and included in the Restructuring Order being considered. Not one of the Corporation’s witnesses whose testimonies were referred to as supporting the determination of including net metering customers, provided any reference to Article 4 nor did they provide any evidence of how the charges were neither “excessive or an obstacle to renewable energy projects”.

The Transition Charge does not meet Article 29’s criteria. The Corporation has provided no expert opinion to support that the charges are not excessive or that they are not obstacles to renewable energy projects. On the record we have Mr. Zarumba’s testimony.

He stated that he believed it was a mandatory charge. Also on the record are both WindMar Group and the Puerto Rico State Office of Energy Policy whom have assured and documented to the Commission that the Transition Charge on net-metering customers will be an obstacle to distributed generation renewable energy projects.

Notwithstanding the foregoing statements, net-metering customers are charged for the net kWhs they consume (meaning Gross kWhs imported from the grid less exported kWhs from their distributed generation). We have no opposition to net metering customers paying Transition Charges upon that net portion of kWhs. They have always paid all charges associated with the net kWh consumed.

Conclusion and Final Request

Article 20 of the Revitalization Act requires the Corporation to determine if the Transition Charge should apply to behind the meter generation by providing an explanation and demonstrating it “being practical to administer” and “would ensure the full and timely payment of the Restructuring bonds...”. The Petition has failed to demonstrate that it has a practical process to apply transition charges to net-metering or behind the meter customers. Furthermore, the Petition showed that the adjusting mechanism will make up for any revenue shortfall by increasing the contribution of those paying the charges. Including net-metering or behind the meter customers does not ensure full and timely payment, it is the Adjusting Mechanism that assures the full and timely payment.

Article 29 of the Revitalization Act requires the Commission apply certain criteria when evaluating if the Transition Charge should apply to net-metering Customers. The first

criteria requiring that the charge be “just” to net-metering customers and that it covers *“the operating and administrative expenses of the grid services that any customer that entered into a Net Metering Agreement receives”*. By definition the Legacy Debt, to be repaid by the proposed Transition Charge, has no relationship to the operating expenses of grid services received by a net-metering customer. Consequently, the determination to include Transition Charges when billing net-metering customers does not meet the aforementioned criteria.

The second criteria of Article 29 states that for the Commission to permit the Transition Charge upon net-metering customers it cannot be *“excessive or established in such a manner as to constitute an obstacle to the implementation of renewable energy projects.”*

The Commission’s record lacks any evidence to demonstrate applying the Transition Charge to net-metering Customers would not be *“excessive or established in such a manner as to constitute an obstacle to the implementation of renewable energy projects.”*

The only information on record regarding this subject advises all the opposite. Both the WindMar Group and the Puerto Rico State Office of Energy Policy have clearly stated and documented on record that approving the Transition Charge upon behind the meter generation would be detrimental to renewable energy distributed generation.

Approving the Transition Charge for net-metering customers and behind the meter generation would be unlawful.

We respectfully request this honorable Commission’s final decision upon the Transition Charge to not include any additional charges to net metering customers or behind the meter generation given that the proposed charges would bring renewable energy integration to an immediate halt and would be contrary to law.

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

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Respectfully submitted, by email as requested by this Honorable Commission, this 16th
day of June, 2016.

Por:



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