

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

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

Petitioner.

No.: CEPR-AP-2015-0001

SUBJECT: PREPA'S MOTION TO
AMEND INDEX AND TO SUPPLY
ADDITIONAL WORK PAPER AND
CORRECTED SCHEDULE D-2

**PREPA'S MOTION TO AMEND INDEX AND
TO SUPPLY ADDITIONAL WORK PAPER
AND CORRECTED SCHEDULE D-2**

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 Amend Index and to Supply Additional Work Paper and Corrected Schedule D-2. This Motion is supported by an Affidavit. In support of its Motion, PREPA states as follows:

1. On May 27, 2016, PREPA filed its rate Petition. The rate filing included an Index as well as the Petition and its other attachments.
2. PREPA inadvertently omitted a Work Paper, PREPA Ex. 4.0, WP 2, from the Index and from the materials included in Attachment D to the Petition.
3. PREPA is supplying the Work Paper today, but it is attached to the confidentiality motion that PREPA also is filing today, and PREPA did not want to submit the same document attached to two different motions on the same day. So, the Work Paper is provided there and is not repeated here.

smv
KJ

4. Please note that said Work Paper is too large to print in hard copy or in .pdf in a reasonable manner, as addressed in a third separate (supplemental) motion that PREPA also is filing today.

5. With this Motion, PREPA is providing to the Commission a corrected Schedule D-2, which the electronic file is being renamed as *Sch. A through F (Except for E-9, F-4) CORR.* (Note that a correction is being made in cell A1 of Schedule D-2b.) This item is being provided in Excel format only because its size makes its not practically printable. PREPA also is supplying an attached .pdf slip sheet to note the electronic submission.

6. In addition, the Index should be updated to reflect PREPA's confidentiality designations of Schedules G-1, G-2, G-4, G-5, G-6, I-3, M-1, M-2, M-3, N-1, and Work Papers PREPA Ex. 4.0, WP 2; PREPA Ex. 5.0, WP 1 and WP 2; PREPA Ex. 6.0, WP 5; and PREPA Ex. 9.0, WP 1.

7. In addition, the Index also contains names for some of the Exhibits attached to PREPA Ex. 5.0 that should be corrected (PREPA Exs. 5.04 through 5.16).

8. In consideration of the aforementioned, PREPA seeks leave to substitute the updated and corrected Index, which is attached hereto.

9. Granting the instant Motion would be fair and reasonable and would not unfairly prejudice any person or entity.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Commission allow PREPA to substitute the attached corrected and updated Index and to submit Work Paper PREPA EX. 4.0, WP 2, and corrected Schedule D-2 in its renamed form.

Dated: June 3, 2016

Respectfully submitted,

THE PUERTO RICO ELECTRIC
POWER AUTHORITY



Nelida Ayala Jimenez

TSPR No. 10896

General Counsel

Puerto Rico Electric Power Authority

P.O. Box 363928

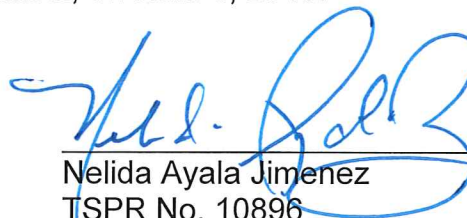
San Juan, Puerto Rico 00936-3928

Tel. 787-521-4431; 787-521-4433

Email: n-ayala@aepr.com

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 3, 2016.



Nelida Ayala Jimenez
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General Counsel
Puerto Rico Electric Power Authority
P.O. Box 363928
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Email: n-ayala@aepr.com

VERIFICATION

I, Sonia Miranda Vega, of legal age, engineer, married, and resident of Vega Alta, Puerto Rico, in my capacity of Director, Director of Planning and Environmental Protection, of the Puerto Rico Electric Power Authority ("PREPA"), under oath declare as follows:

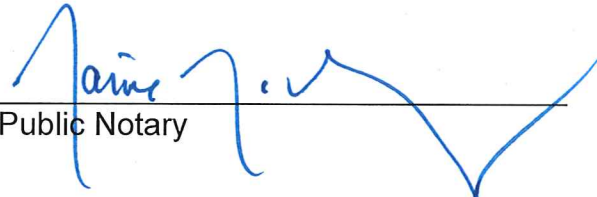
1. My name and personal circumstances are those stated above.
2. I have reviewed PREPA's above Motion.
3. In my capacity as Director, Director of Planning and Environmental Protection of PREPA, I have been duly authorized to provide this Verification in support of the Motion.
4. The information included in the Motion is true on the basis of my personal knowledge or on the basis of the information supplied to me by employees of PREPA and, with respect to legal points, by counsel for PREPA.

In San Juan, Puerto Rico, this 3rd day of June, 2016.


Sonia Miranda Vega

Affidavit: 3,590

Sworn and subscribed before me by Sonia Miranda Vega, of the personal circumstances above mentioned, whom I personally know, in San Juan, Puerto Rico, this 3rd day of June, 2016.


Public Notary



EXENTO PAGO ARANCEL
LEY 47
4 DE JUNIO DE 1982