GOVERNMENT OF PUERTO RICO
PUERTO RICO ENERGY COMMISSION

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY FY19 RATES	**CASE NO.:** CEPR-AP-2018-0002 **SUBJECT:** Proceeding to Determine PREPA's Rates for FY2019, and to Modify the January 2017 Rate Order.

RESOLUTION AND ORDER REGARDING RATES FOR FISCAL YEAR 2019

I. Introduction

This Resolution initiates a proceeding to ensure that the Puerto Rico Electric Power Authority's ("PREPA") rates for FY2019 are just and reasonable and not unduly discriminatory, as required by Article 6.25 of Act 57-2014.[1]

On January 10, 2017, the Puerto Rico Energy Commission ("Commission") issued a Final Resolution and Order ("2017 Rate Order").[2] For the first time in PREPA's 77-year history, PREPA's rates were set by an objective, professional regulator based on evidence and testimony produced under oath. Those rates were scheduled to enter into effect on FY2017. The 2017 Rate Order also established procedures for determining rates applicable to FY2018, as well as procedures for subsequent "three-year rate cases" and "one-year budget examinations."[3]

The 2017 hurricanes have drastically affected PREPA's costs, revenues and expectations of future sales, making it unlikely that the rates in effect today satisfy the statutory "just and reasonable" standard. The Commission therefore initiates this proceeding to set new rates for the period July 1, 2018 through June 30, 2019 ("FY2019 Rates"). These new rates must:

1. Recover the reasonable cost of providing service during FY2019.

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[1] The Puerto Rico Energy Transformation and RELIEF Act, as amended.

[2] *See* Final Resolution and Order, Case No. CEPR-AP-2015-0001 (January 10, 2017) and Final Resolution on Reconsideration, Case No. CEPR-AP-2015-0001 (March 8, 2017) (together, the "2017 Rate Order"). Prior to the 2017 Rate Order, the Commission had set "provisional rates". *See* Order Establishing Provisional Rates, Case No. CEPR-AP-2015-0001 (June 27, 2016). As of the date of this Resolution and Order, the rates currently in effect are those authorized by the June 27, 2016 Order Establishing Provisional Rates.

[3] *See* January 2017 Rate Order at ¶¶ 438-457.

2. Begin recovery of costs that were approved for recovery by the 2017 Rate Order and incurred by PREPA, but have not yet been recovered from PREPA's customers.

3. Reflect reasonable expectations for federal funding to support hurricane recovery efforts.

4. Reflect all feasible efforts to reduce costs, consistent with the long-term objective of reliable, high-quality service.

5. Address the unique challenges regarding debt service.

6. Be based on a revenue requirement that complies with any overall expenditure cap established by the Federal Oversight and Management Board ("FOMB").

This Order describes (a) the substantive steps the Commission will take to set the FY2019 Rates, (b) the information PREPA must submit to support those steps and (c) the procedures and schedule the Commission will use to reach a decision on or about July 31, 2018. Because the bills reflecting FY2019 Rates will not be issued by PREPA until after the date on which FY2019 begins (*i.e.*, July 1, 2018), PREPA will need to adjust its future bills to address any over- or under-collection from the beginning of FY2019 until the date on which the new FY2019 Rates are reflected in actual bills.

Effect on the 2017 Rate Order: For purposes of FY2019, this Resolution and Order substitutes for the procedures established in ¶¶ 438-457 in Part Four of our 2017 Rate Order. This single-year procedure for FY2019 established by this Resolution and Order is necessary because of the unique effects of the 2017 hurricanes on PREPA's operations, costs and revenues. As for future years, the Commission will determine rate-setting procedures, in consultation with intervenors, before the end of FY2019. Until further notice, therefore, ¶¶ 438-457 of the 2017 Rate Order will not apply, with these two exceptions: "PREPA shall have no expectation of readily spending more than its approved revenue requirement, then simply charging ratepayers for the excess" (¶ 442); and "[o]nly in extraordinary situations, where PREPA proves it had no control of a cost increase (such proof to include testimony from those individuals responsible for the areas that experienced the cost increase), will the Commission permit after-the-fact recovery of costs not pre-approved by the Commission" (¶ 443). Of course, ¶ 448 (explaining why imprudent costs must be prevented before they are incurred) also remains applicable.

II. Substantive Approach

In this unique context of FY2019, the necessary substantive approach to creating a lawful revenue requirement for PREPA has five major steps: (a) establish the FY2019 revenue requirement, (b) establish FY2019 rates by allocating the revenue requirement among customer classes and then within customer classes, (c) create a procedure for addressing in advance any unexpected costs incurred during FY2019, (d) establish a procedure for addressing in FY2020 rates any over-collections or under-collections occurring during FY2019, and (e) prepare for rate changes in FY2020 and beyond. Each step is discussed next.

A. Establish the FY2019 Revenue Requirement

To build a new revenue requirement based on credible evidence in a short amount of time, the Commission must work with existing information by taking the following steps: First, we must update the revenue requirement adopted in the 2017 Rate Order (not including the debt service costs) to reflect likely changes to the costs reflected in the 2017 Rate Order. Second, we must create two adjustable riders for two categories of costs not covered by the 2017 Rate Order: (a) a rider for restoration costs caused by the 2017 hurricanes, and (b) a rider for revenues anticipated by the 2017 Rate Order but not received due to the reduction in customer payments caused by the 2017 hurricanes and their aftermath. Third, we address the unique challenges regarding debt service. Finally, the revenue requirement produced by the sum of these preceding steps must be capped to reflect any expenditure limit imposed by the FOMB. We discuss each step next.

1. Create FY2019 baseline revenue requirement by updating the FY2017 baseline revenue requirement (not including debt service) to reflect inflation

In this expedited proceeding, the Commission must work with information that is immediately available. The starting point will be the revenue requirement approved in the 2017 Rate Order. We must update that FY2017 revenue requirement to reflect FY2019 cost levels. The update will reflect inflation in the items that made up the FY2017 revenue requirement, as well as new items not included in the FY2017 revenue requirement. The updated FY2019 cost level must then be reduced by any cost savings that have occurred while existing rates have been in effect, relative to the cost levels anticipated by the FY2017 revenue requirement. These baseline (FY2017) and updated (FY2019) numbers should not include debt service costs, which we address in Part II.A.4 below.

If there are new cost components not covered in the FY2019 baseline revenue requirement or in the two riders discussed below, PREPA shall identify these costs separately and justify their reasonableness.

2. Create rider for amortized recovery of restoration costs arising from the 2017 hurricanes, reduced by federal grants provided to defray those costs.

(a) Because the 2017 Rate Order did not reflect the costs associated with the 2017 hurricanes, those costs must be added to the FY2019 baseline revenue requirement. The cost level proposed by PREPA shall distinguish between restoration costs already incurred prior to FY2019, and hurricane restoration costs PREPA anticipates incurring during FY2019. For the reasons explained in Part Four of the 2017 Rate Order, the Commission will review for prudence all prospective costs before they are incurred. PREPA shall include in its projected restoration costs only those projects which it will undertake at its cost (as distinct from projects undertaken by other entities that will incur their own costs).

(b) The 2017 hurricane costs shall be offset by federal grants made to PREPA to cover those costs. The initial offset shall be the amount for which PREPA has received actual commitment by the federal agencies.

(c) Because neither PREPA nor the Commission knows the level of restoration costs or the amount of federal assistance with reasonable certainty, a rider is the appropriate way to reconcile projected with actual levels. PREPA therefore shall propose language for such a 2017 hurricane cost rider. Within the rider, the restoration costs referenced in (a) above, and the federal grant offsets referenced in (b) above, shall be adjusted prospectively. PREPA shall notify the Commission of any anticipated increase or decrease in the storm restoration costs relative to the initial values. PREPA shall not incur any increase in those costs without a Commission finding of prudence, under a procedure to be designed that satisfies both PREPA's need for expedition and the Commission's duty to ensure that rates are just and reasonable. PREPA shall also notify the Commission of any increase or decrease in anticipated grants from federal agencies.

(d) The 2017 hurricane cost rider will not include duplicate costs otherwise included in the 2019 revenue requirement.

(e) The net costs in the rider shall be amortized over some appropriate period of years, to be determined by the Commission in its final order in this proceeding, and subject to revision as the actual amount of net hurricane costs becomes clearer. PREPA shall propose and justify an amortization period.

3. Create rider for amortized recovery of revenues not collected due to 2017 hurricane under-collections

Because of the 2017 hurricanes, it is likely PREPA experienced under-collections above the normal level of under-collections anticipated in the 2017 Rate Order. There are at least four likely reasons: (i) some customers stopped consuming electricity due to failure of the PREPA delivery system or damages sustained by their homes and businesses; (ii) for a period of time, PREPA stopped issuing invoices; (iii) some customers stopped paying their bills (due to lack of income and other factors); and (iv) some customers who did pay their invoices consumed much less than normal. Each of these factors would have reduced PREPA's revenues below the level necessary to recover the costs associated with its FY2017 revenue requirement. PREPA shall calculate this under-collection amount.

The under-collection shall be offset by any reduction in PREPA's operating costs arising from the 2017 hurricanes, such as reduced meter reading, reduced head-count for non-recovery activities, and deferred maintenance, among others. PREPA shall identify all such cost reductions and subtract them from the gross under-collection of revenue. The resulting net amount will go into the rider, to be amortized over a number of years to be determined by the Commission in the final order in this matter. In addition to providing the necessary information, PREPA shall propose rider language and an amortization period.

4. Determine appropriate treatment of debt service costs

The 2017 Rate Order addressed PREPA's debt service costs in two ways: First, the Order stated a projected amount of debt associated with the Restructuring Services Agreement (RSA). That debt would be recovered through a "Transition Charge" whose formula and legal structure the Commission approved in its Transition Charge Order of June 2016.[4] This amount was not included in the FY2017 revenue requirement because it was to be recovered through the Transition Charge. Second, the 2017 Rate Order did include in the revenue requirement a line item for "legacy debt," defined as debt not participating in the RSA and therefore not included in the anticipated Transition Charge.[5]

The RSA has expired, and PREPA has filed for PROMESA Title III restructuring (leading to a stay on PREPA's payments for debt service). Furthermore, PREPA recently executed, with the Commonwealth of Puerto Rico as lender, an agreement for a revolving loan to help pay operating expenses.[6] Consequently, the Commission has no evidentiary basis for including in the FY2019 revenue requirement an amount reflecting PREPA's obligatory debt service payments for that year. Indeed, PREPA might have no obligatory debt service in FY2019, depending on when the federal court decides the myriad debt questions.

It is necessary, however, that ratepayers be aware that the absence of clear information on debt service today does not mean they will be exempt from making payments toward that debt service in the future. PREPA's debt has helped finance the very assets and operations that produce the electricity that today's ratepayers use. Under typical circumstances and under traditional regulatory treatment, the exclusion of all debt service from FY2019 rates could have two negative consequences: It could reduce the bondholder confidence necessary to attract new capital to Puerto Rico, and it could shift to future ratepayers, debt costs that are properly attributable to services received by current ratepayers. Yet, these are not typical circumstances. There are additional governmental entities that have authority over the Title III proceeding, hence the amount of debt service

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4 Restructuring Order, Case No. CEPR-AP-2016-0001 (June 21, 2016). The Commission's jurisdiction was limited to approving the form of the Transition Charge mechanism and the mathematical accuracy of its calculation, but not the actual amount.

5 *See* 2017 Rate Order at ¶ 262 and n.206; and Attachment 1 to the 2017 Rate Order at lines 20-22 and 37-39.

6 *See* the U.S. District Court's "Order (a) Authorizing Debtor Puerto Rico Electric Power Authority to Obtain Postpetition Financing, (b) Providing Superpriority Administrative Expense Claims, and (c) Granting Related Relief," Case 17-04870-LTS, Doc #744 (Feb. 19, 2018).

legally required. The Commission therefore cannot, at this time, responsibly establish a specific debt service level to include within the FY2019 revenue requirement.

Under Act 57-2014, PREPA has the legal burden of proving that its rates are just and reasonable. PREPA therefore shall submit to the Commission, along with its application for new rates, its position on whether the FY2019 revenue requirement should include a quantity for debt service; and if so, what that quantity should be. In forming this position and in choosing a quantity (if any), PREPA shall consult with its bondholders, the FOMB, the Puerto Rico Fiscal Agency & Financial Advisory Authority (and even the federal court, if desirable and feasible). PREPA shall support its position with evidence. On this subject of whether the FY2019 revenue requirement should include debt service, and what the quantity should be, the Commission welcomes evidence from the aforementioned entities and others, at any time after issuance of this Resolution up to a deadline the Commission will establish after receiving PREPA's evidence. Parties to this proceeding will also have an opportunity to comment on PREPA's position.

If PREPA takes the position that the FY2019 revenue requirement should include a debt service component, it shall include in its application for FY2019 rates, language for a temporary debt service rider and an associated escrow arrangement. When the federal court ultimately determines PREPA's debt, the Commission will adjust the rider level to produce the appropriate annual debt service amount. This combination of rider and escrow will preserve the amounts collected from ratepayers, which are attributable to debt service for payment to bondholders after the federal court and others (such as the Legislature, which might again decide that a securitized revenue path is desirable) determine the amount to be paid to bondholders, as well as the timing and mechanics by which the payments will occur.

5. Adjust the above-calculated amounts as necessary to comply with any ceiling on total expenditures imposed by the Federal Oversight and Management Board.

The sum of the foregoing four steps, along with PREPA's existing pass-through clauses, will yield a total revenue requirement. If FOMB has subjected PREPA to a cap on total expenditures, and if the revenue requirement calculated by the foregoing steps exceeds that FOMB-imposed ceiling, PREPA shall propose to the Commission, on a schedule determined by the Commission, specific actions necessary to reduce the total to the FOMB's requirement. The Commission then will approve or modify PREPA's proposal, as necessary.

B. Adjust existing rates to reflect the new revenue requirement

The Commission will adjust existing rates, either up or down, to reflect the new FY2019 revenue requirement. The adjustment will be on either a percentage basis or a cents/kWh basis, or possibly a combination of those approaches. PREPA should provide information on the advantages and disadvantages of each approach, given the need to put just and reasonable rates in place as soon as possible. To determine the rate and revenue increases by class under these options, the Commission will need from PREPA demand and sales projections for each customer class.

C. Address unexpected costs during FY2019

If during FY2019 PREPA anticipates expenditures (other than restoration costs, which were addressed in Part II.A.2 above) exceeding those approved in this proceeding, PREPA must obtain Commission approval prior to making or committing to such expenditures, through a procedure to be designed by the Commission to satisfy both PREPA's need for expedition and the Commission's duty to ensure that rates are just and reasonable. Without this procedure, there is no way to protect ratepayers from imprudent costs, because (as explained in the 2017 Rate Order at ¶ 428) once PREPA incurs those imprudent costs there are no private shareholders to absorb them.

D. Provide for post-FY2019 adjustment for over- or under-collection

Actual revenues inevitably deviate from projections. Toward the end of FY2019, under a Commission-established schedule, PREPA shall compute the deviation and propose an adjustment for FY2020 rates that recovers any FY2019 shortfall (or refunds of any FY2019 over-recovery) over the 12 months of FY2020. This process reconciles only revenues. It does not reconcile costs. There will be no reconciliation of costs for FY2019, with two exceptions: if actual costs were below projected costs; or if, during FY2019, the Commission approved cost increases under the procedure described in the immediately preceding paragraph. Otherwise, the Commission would be, in effect, accepting the "blank check" proposal made by PREPA's witness Dr. Hemphill where PREPA recovers, after the fact, any expenditures that exceed those approved by the Commission, regardless of their prudence.[7] Customers will be protected from imprudent costs because PREPA is prohibited from incurring costs above the levels approved by the Commission.

E. Prepare for future rate changes

Because FY2019 is likely to be a transition year to a new market structure, and because PREPA will likely experience organizational changes that will affect its entire cost structure, the Commission during FY2019 will hold a proceeding to establish new filing requirements and new procedures for the establishment of multi-year rate cases and single-year reconciliations. These procedures will need to prevent imprudent costs before they are incurred. It also will be necessary to align PREPA's revenue requirement calculations with its budget procedures, so that we do not repeat the experience of the FY2017 rate case, in which the former bore no visible relationship to the latter.[8]

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[7] *See* January 2017 Rate Order at ¶¶ 431-437, 442, 450 and n.313.

[8] *See* January 2017 Rate Order (at ¶ 448).

III. Procedures

Completion of this proceeding on or about July 31, 2018 requires a constrained schedule. The Commission **ORDERS** PREPA to, no later than seven days from the date this Resolution and Order is notified, propose to the Commission dates for each of the steps described below. The final Procedural Calendar will be established and approved by the Commission through a separate Resolution and/or Order.

[INSERT DATE XX]	Anyone wishing to intervene in this proceeding shall submit a request, in accordance with Regulation No. 8543.[9] The Independent Consumer Protection Office ("ICPO") and the Commonwealth Energy Public Policy Office ("CEPPO") are hereby made a party to this proceeding and need not submit requests to intervene.
[INSERT DATE XX]	PREPA shall respond to the attached information requirements (Appendix A).
[INSERT DATE XX]	To the extent not already submitted, PREPA shall submit the information described in Part II.A of this Resolution and Order, along with narrative explanations. The narrative explanations shall be signed under oath by those PREPA employees or representatives responsible for establishing and overseeing the cost or revenue projections. These narrative explanations may, but need not be, presented in the form of question-and-answer testimony, provided the explanations can be attributed to specific individuals who will stand for examination by the Commission.
[INSERT DATES XX]	The Commission will hold a technical hearing at which it will admit submissions into evidence and question technical witnesses. There will be limited time for parties to question each other's witnesses.
[INSERT DATE XX]	The Commission will hold a public hearing at which members of the public may offer comments.
[INSERT DATE XX]	Parties will submit post-hearing briefs, if they wish.
[July 31, 2018]	Expected date for Commission issuing order determining FY2019 rates.

[9] Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Procedures.

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IV. Technical Conference

The Commission will hold a technical telephone conference on **May 18, 2018 at 10:00 a.m.** to answer any questions about this Resolution and Order and to determine if any modifications are necessary due to practical considerations.

Parties seeking to participate in the technical telephone conference shall submit a request to the Commission via e-mail (secretaria@energia.pr.gov) detailing the party's contact information and the name of the person(s) whom shall participate on behalf of the requesting party. This request shall be submitted **no later than May 11, 2018**. The Commission will then provide each party with the dial in information, instructions for participating of the technical telephone conference and any other relevant information.

Be it notified and published.

Ángel R. Rivera de la Cruz
Associate Commissioner

José H. Román Morales
Associate Commissioner
Interim Chairman

CERTIFICATION

I hereby certify that the majority of the members of the Puerto Rico Energy Commission has so agreed on May 4, 2018. I also certify that on this date a copy of this Resolution and Order regarding the Case No. CEPR-AP-2018-0002 was notified by electronic mail to the following: n-vazquez@aeepr.com, c-aquino@aeepr.com, n-ayala@aeepr.com, codiot@oipc.pr.gov, jperez@oipc.pr.gov, wilma.lopez@aae.pr.gov, francisco.rullan@aae.pr.gov. I certify that today, May 4, 2018, I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Commission and I have sent a true and exact copy to the following:

Autoridad de Energía Eléctrica de Puerto Rico
Attn.: Nitza D. Vázquez Rodríguez
Nélida Ayala Jiménez
Carlos M. Aquino Ramos
PO Box 364267
Correo General
San Juan, PR 00936-4267

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

Oficina Estatal de Política Pública Energética
p/c Ing. Francisco Rullán Caparrós
Lcda. Wilma I. López Mora
P.O. Box 413314
San Juan, Puerto Rico 00940

For the record, I sign this in San Juan, Puerto Rico, today May 4, 2018.

María del Mar Cintrón Alvarado
Clerk

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Appendix A
Information Requirements for PREPA

A. Changes in costs

1. Identify and justify an appropriate escalation factor for each category of costs addressed in the January 2017 Rate Order. Likely categories are operating expenses (*e.g.,* generation, transmission, distribution, billing, and administrative and general, fuel and purchased power costs), and for capital expenditures.

B. Provisional rate

1. Distinguishing between the provisional rates approved by the Commission's order of June 27, 2016 and the permanent rates approved in the January 2017 Rate Order, explain which rates PREPA has charged during which months.
2. For each month since July 1, 2016, provide a detailed breakdown of the revenue collected from each element of the rate from each customer class, in an Excel-compatible electronic format, unlocked, with formulae intact.

C. Billing of customers during and after the 2017 hurricanes

1. Identify the precise period of time during which PREPA did not bill customers. Identify any differences in dates applicable to different customer categories.
2. Explain how PREPA has handled, or proposes to handle, billing customers for consumption and demand recorded during the period when PREPA did not bill customers. If there is an absence of recorded data, describe and explain.
3. (To the extent not already answered) As a result of Hurricanes Irma and Maria and the associated recovery process, did PREPA incur fuel and purchased power costs that have not been recovered from PREPA customers? If so, provide a monthly quantification of the costs incurred and not recovered, including the costs by fuel type (for PREPA's generators) and by provider (for purchased power).

D. Capital Projects

1. (a) Regarding capital projects whose costs were reflected in the January 2017 Rate Order, which have been completed? (b) For each project not completed, what is the percentage of completion?
2. What other capital projects, not addressed in the immediately preceding question and not related to hurricane recovery, has PREPA begun? Provide a detailed breakdown of the projected costs, the percentage of completion and the completion schedule.
3. What capital projects, not identified in the immediately preceding two questions, does PREPA anticipate starting during FY2019? For each project, provide the project budget (identifying total planned expenditure by item or category as appropriate for the project) and the expected expenditure and completion schedule.

E. Hurricane Costs

1. Provide in an Excel compatible electronic format a chart or spreadsheet identifying each reimbursement request made to any federal agency for hurricane recovery costs, showing the date of each request, the agency to which the request was made, the amount of the request, the types of expenses covered by the request, whether the request has been granted, and the funds received. In the alternative, provide (1) a copy of each reimbursement request made to any federal agency providing hurricane recovery assistance, and (2) a copy of each notification of reimbursement received from any federal agencies.
2. Provide a detailed breakdown of restoration expenses by month in an Excel-compatible electronic format, unlocked with formulae intact, for the Hurricanes Irma and Maria recovery efforts. The breakdown should include capital expenditures by type (distribution, transmission, generation, etc.), PREPA labor costs (including, in particular, overtime costs), third party (contractor) costs, supplies and other operating costs (e.g. vehicle fuel or rental), and any other category of costs which is appropriate.
3. Provide a copy of all reports and/or analyses conducted or commissioned by PREPA pertaining to restoration costs associated with Hurricanes Irma and Maria.
4. Provide a projection of recovery costs detailed by capital and expenses anticipated for FY2019 and, to the extent available, for subsequent years.

F. Fuel Costs

1. Provide monthly fuel consumption for each of PREPA's generating units from January 2017 to the most recent data available. Provide the monthly fuel consumption data in an Excel compatible electronic format with all formulae intact.
2. Provide monthly fuel prices for each of PREPA's generating units from January 2017 to the most recent data available. Provide the monthly fuel price data in an Excel compatible electronic format with all formulae intact.
3. Provide monthly fuel costs for each of PREPA's generating units from January 2017 to the most recent data available. Provide the monthly fuel cost data in an Excel compatible electronic format with all formulae intact. PREPA may combine its response to these first three fuel cost questions in a single spreadsheet if desirable.
4. Provide monthly delivered energy for each of PREPA's power purchase agreements from January 2017 to the most recent data available. Provide the monthly energy data in an Excel compatible electronic format with all formulae intact.
5. Provide monthly purchased power costs for each of PREPA's power purchase agreements from January 2017 to the most recent data available. Provide the monthly purchased power cost data in an Excel compatible electronic format with all formulae intact.

6. Did either hurricane trigger *force majeure* clauses in any of PREPA's fuel or purchased power contracts? If so, provide a description of the clause and its impact on current contracts.

G. Revenue Allocation and Rate Design

1. Provide PREPA's total booked base revenue by month, from January 2017 to the most recent month available.
2. Provide PREPA's booked base revenue by tariff by month, from January 2017 to the most recent month available.
3. For each tariff code (or if data is not available by tariff code, by tariff), provide the following data by month, from January 2017 to the most recent month available.
    a. Number of customers
    b. Number of customers with PREPA power supply
    c. Number of meters read
    d. Number of meters read with non-zero energy use
    e. Total energy on meters read
    f. Total energy revenue
    g. Total billing demand on meters read (for classes with demand billing)
    h. Total demand revenue
    i. Bills rendered by month
    j. Revenue billed by month
4. Provide the final version of monthly projections for FY2017 that PREPA presented in Case No. CEPR-AP-2015-0001, by tariff or tariff code, for each of these billing determinants:
    a. Customer number
    b. Energy (by block, if applicable)
    c. Billing demand
5. Provide PREPA's current projections for FY2019, by tariff or tariff code, for these billing determinants:
    a. Customer number
    b. Energy (by block, if applicable)
    c. Billing demand

6. Provide the base revenues in FY 2019, by tariff or tariff code, that would result from the projected billing determinants and the current rates.

H. Miscellaneous

1. Please provide any available information about PREPA's levels of bad debt (monthly or quarterly) from January 2017 to the present.

2. List all Directives issued by the Commission in the January 2017 and March 2017 Orders in Docket No. CEPR-AP-2015-0001 with which PREPA has not complied.

3. Provide PREPA's workpapers supporting the value of each rider (Fuel, Purchased Power, and CILT) for each rider revision that PREPA has conducted since January 2017.

4. For each rider (Fuel, Purchased Power, and CILT), provide PREPA's projection of the value that will be in effect in July 1, 2018.