

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

'18 JUL 20 P2:44

IN RE: REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY  
FY19 RATES

NO. CEPR-AP-2018-0002

**SUBJECT: PREPA'S COMPLIANCE  
FILING FOR ITEMS DUE JULY 13, 2018**

**PREPA'S COMPLIANCE FILING FOR  
ITEMS DUE JULY 13, 2018**

TO THE HONORABLE PUERTO RICO ENERGY COMMISSION:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully submits to the honorable Puerto Rico Energy Commission (the "Commission") PREPA's Compliance Filing for items due July 13, 2018.<sup>1</sup> This Compliance Filing consists of information provided in the body of this document and incorporated by reference herein.

PLEASE NOTE. This filing is being submitted by PREPA on an informal basis on July 13, 2018. PREPA anticipates that the filing will be submitted on a formal basis the week of July 16, 2018. There are two reasons for this process. First, the majority of the compliance filing is being submitted by means of providing a "sharepoint" link to allow the download of voluminous materials. The sharepoint link contains links to 9 sets of work papers, a Word document (the Word document's contents are included in Section III of this cover filing), and a very large multi-tab Excel spreadsheet. PREPA wishes to discuss with the Commission's staff and/or legal counsel how to reflect the submission of the sharepoint link in a formal manner. Second, setting aside the foregoing point, PREPA does not have personnel available


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<sup>1</sup> This Compliance Filing is submitted: (1) under the Commission's May 22, 2018 Resolution and Order in this Proceeding to Determine PREPA's Rates for FY2019 (herein after referred to as "this Proceeding"); as clarified and/or modified by: (2) the Commission's Resolution and Order Clarifying Commission Order of May 22, 2018, issued in this Proceeding on June 22, 2018; and (3) the Commission's Resolution and Order Establishing Calendar for Submission of Information, issued in this Proceeding on June 22, 2018.

today who are in a position to submit this compliance filing on a formal basis. Accordingly, this cover filing and the sharepoint link will be submitted informally today by email to the Commission's Interim Clerk with a "cc" to the email address for the office of the Commission's internal counsel.

## **I. BACKGROUND**

1. On May 4, 2018, the Commission issued its Resolution and Order Regarding Rates for Fiscal Year 2019 ("FY2019") (the "May 4 Resolution and Order"), initiating this proceeding. The May 4 Resolution and Order included the Commission's Appendix A, which set forth certain information requirements for PREPA.

2. On May 22, 2018, the Commission issued its Resolution and Order Following Technical Conference (the "May 22 Resolution and Order"). In the May 22 Resolution and Order, the Commission ordered PREPA to submit, no later than May 25, 2018, an annotated version of Appendix A to the May 4 Resolution and Order. The Commission directed that PREPA's annotated Appendix A should explain: "(a) whether the information is or can be made available, and in what form; (b) for information that is or can be made available, an estimated time of submission that information to the Commission; and (c) for information that cannot be made available, a brief explanation." The Commission also directed that for each item, PREPA should indicate the person responsible for providing the answer. 

3. On May 25, 2018, PREPA filed its Response to the May 22 Resolution and Order. As part of its response, PREPA identified certain information requirements for which it was unable to comply and explained why.

4. On June 22, 2018, the Commission issued its Resolution and Order Establishing Calendar for Submission of Information (the "June 22 Resolution and Order Establishing



Calendar”). The June 22 Resolution and Order Establishing Calendar in part addressed PREPA’s May 25<sup>th</sup> Response, and directed PREPA to provide additional information consistent with Appendix A to the May 4 Resolution and Order. The June 22 Resolution and Order Establishing Calendar also included an Appendix A that set forth certain information requirements and established deadlines for PREPA.

## **II. GENERAL POINTS**

5. PREPA wishes to note that the Commission’s directives have not fully taken into account the points made in PREPA’s prior filing about what information does or does not exist or is or is not available with reasonable and practical efforts.

## **III. COMPLIANCE ITEMS**

6. Here is a list of the responses, plus additional information or concerns about some items.

Item B.1	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab B (2017) and Tab B (2018)
Item B.2	See B.1
Item C.1	Please see response in the May 25, 2018 response to the May 4, 2018 order. Available billing data is in item B.1.
Item C.2	Please see response in the May 25, 2018 response to the May 4, 2018 order.
Item C.3	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab C3 and Tab C3 Reconciliation
Item D.1.a	Please see AP-2018-0002-20180713-Compliance-D.xlsx.
Item D.1.b	Please see response in the May 25, 2018 response to the May 4, 2018 order.
Item D.2	Please see response in the May 25, 2018 response to the May 4, 2018 order.
Item D.3	Please see response in the May 25, 2018 response to the May 4, 2018 order.
Item F.1	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab F1 C3
Item F.2	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab F2 F3
Item F.3	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab F2 F3
Item F.4	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab F4 and Tab F5
Item F.5	Please see AP-2018-0002-20180713-Compliance.xlsx, Tab F4 and Tab F5

Item F.6 PREPA is unable to answer the question as this time, as it is a matter of legal discussions between PREPA and the suppliers.

Item G.1 Please see AP-2018-0002-20180713-Compliance.xlsx, Tab G1, G2 y G3 (2017) and Tab G1, G2 y G3 (2018)

Item G.2 See Item G.1

Item G.3.a See Item G.1

Item G.3.b Information not available. For billed customers see Item G.1

Item G.3.c Detail information currently not available.

Item G.3.d Detail information currently not available.

Item G.3.e For energy billed, see Item G.1.

Item G.3.f See Item G.1.

Item G.3.g Detail information currently not available.

Item G.3.h Detail information currently not available.

Item G.3.i Request is not clear, for billed data, see item G.1

Item G.3.j See item G.1

Item G.4.a For final billed data for FY 2017, see Tab B (2017)

Item G.4.b Detail information currently not available.

Item G.4.c Detail information currently not available.

Item G.5.a Information currently under revision by FOMB.

Item G.5.b Detail information currently not available.

Item G.5.c Detail information currently not available.

Item G.6 Information currently under revision by FOMB.

Item H.1 Information currently not available.

Item H.2 PREPA respectfully objects to this item, which would require legal analysis and the functional equivalent of legal briefing to answer in light of the prevailing circumstances, and because some of the subject matter has been stayed or is on judicial review. Item H.2 references a 230 page January 2017 order and a 51 page March 2017 reconsideration order, both of which have been affected by stays issued by the Commission plus there are pending judicial reviews sought by PREPA and an intervenor that were removed to the federal "Title 3" court.

Item H.3 See files under directory *Fuel Factors Workpapers since Jan 17*

Item H.4 See file *2017-09 - Documentos Factores de Ajuste Septiembre 2017.pdf*

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Honorable Puerto Rico Energy Commission accept this Compliance Filing.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 13TH DAY OF JULY, 2018

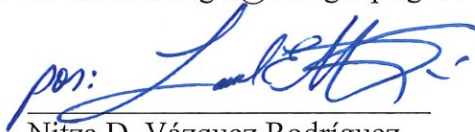
**PUERTO RICO ELECTRIC POWER AUTHORITY**



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**CERTIFICATION OF INFORMAL SUBMISSION**

I hereby certify that on July 13, 2018, I have sent the above Compliance Filing and the referenced sharepoint link informally to the Puerto Rico Energy Commission through (1) its Interim Clerk via emails to [bmulero@energia.pr.gov](mailto:bmulero@energia.pr.gov) and [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov) (2) the office of the Commission's internal legal counsel via email to [legal@energia.pr.gov](mailto:legal@energia.pr.gov).

per: 

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