

COMMONWEALTH OF PUERTO RICO
PUERTO RICO ENERGY BUREAU

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IN RE: REVIEW OF THE PUERTO
RICO ELECTRIC POWER
AUTHORITY INTEGRATED
RESOURCE PLAN

NO. CEPR-AP-2018-0001

SUBJECT: PREPA'S MOTION FOR
AN EXPEDITED TECHNICAL
CONFERENCE

PREPA'S MOTON FOR AN EXPEDITED TECHNICAL CONFERENCE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully submits its Motion for an Expedited Technical Conference. In brief, PREPA seeks an expedited technical conference in order to discuss with the Energy Bureau (1) preliminary results of the Integrated Resource Plan ("IRP") work performed to date; and (2) refinements of the IRP study that, based on those preliminary results, PREPA believes should be made, in particular a revised definition of "Scenario 3".

1. PREPA and its IRP consultants Siemens PTI, to date, have performed many significant components of the IRP work, although, as discussed in PREPA's October 15, 2018, compliance filing in this docket, PREPA anticipates that the final IRP report and filing will not be ready to be filed until January 21, 2019.

2. On October 24, 2018, during the Energy Systems Modernization Summit, PREPA shared a report on the preliminary results of the IRP work to date with the Puerto Rico Central Office of Recovery, Reconstruction and Resilience (COR3), Department of Energy, Financial Oversight and Management Board (FOMB), among others. The October 24th presentation and report were intended to provide preliminary information on

where certain IRP results are heading and to help guide further refinements of the IRP work for the remainder of the study.

3. The October 24th presentation was not intended to provide final results or an action plan. The IRP study has not been completed, as noted above.

4. Based on the IRP preliminary results, PREPA and Siemens are concerned that the Long Term Capacity Expansion plan is probably yielding certain potentially impractical results.

5. However, PREPA and Siemens also believe that a revised definition of "Scenario 3" could produce information that is more probable and realistic and that could give insight into other possible, more economic alternatives.

6. PREPA and Siemens believe it would be in the best interests of all concerned, including the people of Puerto Rico, to discuss the IRP preliminary results and the possible IRP revision at an expedited technical conference and to confirm, after a suitable briefing, that the Energy Bureau does not object to the revision.

7. That expedited process would help keep the IRP on the revised timeline; enable discussion of the relevant points now in an efficient and constructive manner, rather than delaying that discussion until later this year or, even worse, early 2019, which could cause delays in PREPA's transformation process per the FOMB Certified Fiscal Plan; and avoid costly, unnecessary and unproductive potential disputes.

8. PREPA accordingly respectfully requests that the Energy Bureau schedule an expedited technical conference by phone on a date between October 29, 2018, and November 2, 2018.

9. In order to enable the Energy Bureau to make a more fully informed decision on this Motion, and to prepare for the possible expedited technical conference, PREPA has attached hereto a copy of the redacted version of the October 24th report. By redacted, PREPA means that confidential information, in particular, maps with Critical Energy Infrastructure Information that requires special treatment under applicable federal and Puerto Rico law and prior decisions of the Energy Bureau, has been excluded. PREPA also will separately provide, on an "eyes only" basis to the Energy Bureau and its staff, the unredacted version of the report.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the honorable Puerto Rico Energy Bureau grant this Motion and schedule an expedited technical conference on a date between October 29, 2018, and November 2, 2018.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 26th DAY OF OCTOBER, 2018

PUERTO RICO ELECTRIC POWER AUTHORITY



Nitza D. Vázquez Rodríguez
TSPR No. 9311
Executive Advisor
Puerto Rico Electric Power Authority
P.O. Box 363928
San Juan, Puerto Rico 00936-3928
Tel. 787-521-4436; 787-521-4433
Email: n-vazquez@aeep.com

CERTIFICATION OF FILING AND SERVICE

I hereby certify that on October 26, 2018, I have sent the above Motion (including its attachment) to the Puerto Rico Energy Bureau through its Clerk via email to secretaria@energia.pr.gov; and to the office of the Energy Bureau's internal legal counsel via email to legal@energia.pr.gov and sugarte@energia.pr.gov.



Nitza D. Vázquez Rodríguez

TSPR No. 9311

Senior Attorney

Puerto Rico Electric Power Authority

P.O. Box 363928

San Juan, Puerto Rico 00936-3928

Tel. 787-521-4499

Email: n-vazquez@aeep.com