

COMMONWEALTH OF PUERTO RICO
PUERTO RICO ENERGY BUREAU

18 OCT -5 AID: 108

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY INTEGRATED RESOURCE PLAN	CASE NO. CEPR-AP-2018-0001 SUBJECT: PREPA'S (1) COMPLIANCE WITH THE ENERGY BUREAU'S SEPTEMBER 5 TH AND 18 TH ORDERS AND (2) INFORMATIVE MOTION REGARDING IRP TIMELINE
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MOTION COMMETING PREPA'S INFORMATIVE MOTION REGARDING IRP
TIMELINE

TO THE ENERGY BUREAU:

NOW COMES INSTITUTO DE COMPETITIVIDAD Y SOSTENIBILIDAD
ECONOMICA DE PUERTO RICO (ICSE) REPRESENTED BY APPEARING COUNSEL
AND RESPECTFULLY STATES AND PRAYED:

1. On September 26 PREPA submitted a motion titled: PREPA'S (1) COMPLIANCE WITH THE ENERGY BUREAU'S SEPTEMBER 5TH AND 18TH ORDERS AND (2) INFORMATIVE MOTION REGARDING IRP TIMELINE
2. On September 28 the PR Energy Bureau (Bureau) ordered PREPA to, on or before fifteen (15) days from the notification of such order, provide, for the Bureau's consideration, a final timeline for the submission of the IRP.
3. ICSE recognizes that PREPA might need additional time, if for no other reason, the frequent recent changes in leadership and governance.
4. ICSE is worried however that by postponing the compliance with the Energy Bureau orders concerning the IRP, PREPA might make decisions and/or enter into contracts and other actions which might be irreversible. Those contracts and actions might in fact severely limit the effectiveness of the IRP, and much more limit the capacity of the Energy Bureau to perform its responsibilities.
5. Also it appears that PREPA is considering options which, we understand, were already rejected by the Energy Bureau (from PREC), like the AGOP and others.

WHEREFORE ICSE respectfully request that the PREB, if it exercises its discretion to grant additional time to file the IRP do so in such a manner which does not become an instrument of PREPA to by-pass existing IRP and reopen substantive prior

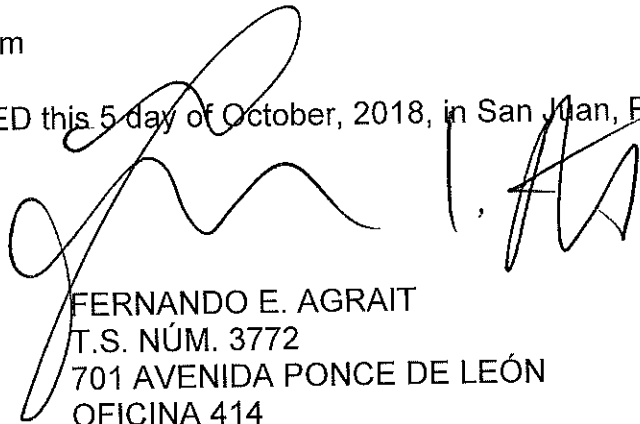
determinations of the Bureau or include options that are arbitrary, without base or without proper studies, data or analyses.

CERTIFY OF FILING AND SERVICE

I hereby certify that on October 5, 2018, I have sent the above filing to the Puerto Rico Energy Bureau through its Clerk via email to secretaria@energia.pr.gov and mcintron@energia.pr.gov; and to the office of the Bureau's internal legal counsel via email to legal@energia.pr.gov and sugarte@energia.pr.gov.

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RESPECTFULLY SUBMITTED this 5 day of October, 2018, in San Juan, Puerto Rico.



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