

GOVERNMENT OF PUERTO RICO
PUERTO RICO ENERGY BUREAU

19 FEB 11 P4:10

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

No. CEPR-AP-2018-0001

SUBJECT: PREPA's Motion for a 3-
Day Extension of Time

**THE PUERTO RICO ELECTRIC POWER AUTHORITY'S
MOTION FOR A 3-DAY EXTENSION OF TIME**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully moves that the Puerto Rico Energy Bureau (the "Energy Bureau")¹, extend, for three days, until February 15, 2019, the due date for PREPA's submission of its Integrated Resource Plan ("IRP") filing. In support of its Motion, PREPA states as follows:

1. On January 23, 2019, PREPA filed drafts of most of the required IRP main Report and of most of its Appendices. However, the filing did not include IRP main Report Part Nine and Caveats and Limitations and Part Ten on PREPA's proposed Action Plan. The Action Plan, in particular, is a vital component of the IRP, but the Action Plan was not yet finalized in some respects, and, as a result, had not yet received PREPA management (Executive Director / Chief Executive Officer and Governing Board) approval. The filing did not include other supporting documents and Direct Testimony. The supporting documents are a very time-consuming matter to compile. The Direct Testimony could not be finalized until the full IRP, in particular, the Action Plan, was finalized.

¹ References herein to the Energy Bureau include the former Puerto Rico Energy Commission.

2. On January 23, 2019, PREPA filed a Motion for an extension of time for the IRP filing to February 12, 2019. PREPA's Motion indicated, among other things, that the February 12th date was selected after careful consideration of the remaining tasks, and with the intention of avoiding any further motion for an extension of time.

3. On January 25, 2019, the Energy Bureau, on PREPA's Motion, issued a Resolution that extended the IRP filing due date to February 12, 2019. The Resolution, among other things, noted PREPA's Motion's above statement.

4. Based on subsequent developments, and in order to ensure the provision of a sound evidentiary record at the filing stage, however, PREPA now respectfully requests an extension of three more days, to February 15, 2019. PREPA acknowledges that it did not anticipate this circumstance, but PREPA also believes that a three-day extension is in the best interests of this docket and, more importantly, the best interests of the people of Puerto Rico.

5. In particular, PREPA is very mindful of the importance of its Action Plan to this docket and to arriving at a resource plan that is in the best interests of the people of Puerto Rico. PREPA's Governing Board currently is engaged in careful consideration of the IRP and the Action Plan, but PREPA now anticipates that final Governing Board action on this subject will not take place until February 13, 2019, at the latest. Until there is final Board action, PREPA Executive Director and Chief Executive Officer José Ortiz Vázquez is not able to discuss the Board's action in his planned Direct Testimony, nor is PREPA able to provide a copy of the Board's resolution. PREPA believes strongly that the evidence submitted at the stage of the IRP filing should include the Board's action and

testimony of Mr. Ortiz that reflects the Board's action, so that the Energy Bureau and other stakeholders will have the benefit of that information.

6. In addition, Mr. Ortiz was called for official government business outside of Puerto Rico, and will not be arriving back at the office until February 14, 2018.

7. Conversely, if PREPA were to file the IRP filing by February 12, 2019, PREPA could do so, in a sense, but the filing necessarily would be subject to the PREPA Governing Board's final action and the filing, therefore, would need to include some significant qualifying language. Then, later in the week, PREPA would have to file a motion to supplement and update and possibly otherwise revise the filing to reflect the Governing Board's action and to update Mr. Ortiz's testimony.

8. Accordingly, PREPA, in this motion, now respectfully requests that the Energy Bureau extend for three days, until February 15, 2019, the due date for the IRP filing.

WHEREFORE, for the reasons stated above, the Puerto Rico Electric Power Authority respectfully requests that the honorable Puerto Rico Energy Bureau extend the deadline for PREPA's Integrated Resource Plan filing to February 15, 2019.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 11th DAY OF FEBRUARY, 2019

PUERTO RICO ELECTRIC POWER AUTHORITY



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: nitza.vazquez@prepa.com

CERTIFICATION OF FILING AND SERVICE

I HEREBY CERTIFY that, on February , 2019, I have filed the foregoing Motion with the Puerto Rico Energy Bureau in hard copy format at the office of the Clerk of the Puerto Rico Energy Bureau, at the Seaborne Building Plaza (old World Plaza Building), 268 Munoz Rivera Avenue, Plaza Level, Suite 202, San Juan, Puerto Rico, 00918; and, further, at approximately the same time, that the Motion was sent to the Puerto Rico Energy Bureau via email to secretaria@energia.pr.gov and mcintron@energia.pr.gov, 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: nitza.vazquez@prepa.com