

**COMMONWEALTH OF PUERTO RICO  
PUBLIC SERVICE REGULATORY BOARD  
PUERTO RICO ENERGY BUREAU**

SECRETARIA  
COMISION DE ENERGIA DE  
PUERTO RICO

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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  
LIMITED WAIVERS OF FILING  
REQUIREMENTS UNDER  
REGULATION NO. 9021

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FILING REQUIREMENTS UNDER REGULATION NO. 9021**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully submits to the honorable Puerto Rico Energy Bureau (the "Energy Bureau") this Motion for Limited Waivers of Filing Requirements Under Regulation No. 9021 (Reg. No.9021).

PREPA and its integrated resources plan ("IRP") consultants, Siemens Power Technologies International, have worked very diligently to prepare and submit an IRP filing that complies fully with the applicable statutory provisions, Reg. No. 9021, and the Energy Bureau's applicable orders in the instant docket.

PREPA and Siemens have identified the following limited items as to which PREPA needs to seek waivers or partial waivers of filing requirements in Reg. No. 9021.

Section of Reg. No. 9021	Item	Reasons for Waiver
2.02(D)	Appendix 2 – Prior Action Plan Implementation Status	Sec. 2.02(D) requires a technical Appendix 2 attached to the IRP titled "Prior Action Plan Implementation Status."

		<p>PREPA seeks a waiver of this item because of the inherently severely limited, qualified, and not informative discussion that otherwise would occur in Appendix 2. First, as the Energy Bureau is aware, the Modified IRP that became effective in March 2017 was incomplete in certain respects, e.g., the Modified IRP did not resolve PREPA's then-AOGP proposal and what actions to take at the Aguirre site, it provided for further discussions regarding what to build at Palo Seco, and it provided for further steps to be determined on some other subjects, such as energy efficiency and demand response programs. Second, the September 2017 Hurricanes Irma and Maria obviously had devastating effects on Puerto Rico and on PREPA's assets, systems, services, and functions. Finally, as the Energy Bureau is aware, PREPA has been submitting compliance reports under the Modified IRP to the Bureau at the end of every quarter beginning with December 2016 through and including December 2018, except that certain reports were excused or postponed due to the Hurricanes and their effects. Under these circumstances, PREPA does not see any practical or useful manner in which to prepare Appendix 2.</p>
2.02(F)(2)	Computer Modeling and Software	<p>Sec. 2.02(F)(2) contains provisions relating to Energy Bureau and, potentially, intervenor access to computer models and software.</p> <p>PREPA proposes the following approach to this subject. PREPA does not consider this to be a waiver request, but, PREPA has included this subject in the event that the Energy Bureau wishes to address it in that context.</p> <p>By way of background, please note that Siemens used the licensed AURORAxmp model to conduct its long-term capacity expansion plan and nodal analysis. The model is confidential and proprietary to the vendor.</p> <p>With respect to the Energy Bureau, PREPA proposes that: (i) PREPA makes available to the Energy Bureau the databases used to</p>



		<p>conduct PREPA's (Siemens') analysis; and then (ii) the Energy Bureau either (a) provides to PREPA the modifications to the databases that it wishes to analyze and permits PREPA (Siemens) to use the software to run the data and return the results to the Energy Bureau, or (b) provides to PREPA a list of changes, and permits PREPA (Siemens) to modify the database, use the software to run the modified data, and return the results to the Energy Bureau. Please note all input files contain Confidential Critical Energy Infrastructure ("CEII") data, and must be treated as such. Please also note that the results also may contain information that is CEII or otherwise is confidential.</p> <p>With respect to intervenors, without waiving any objections to discovery, PREPA currently making a similar proposal, subject to further review of the nature, form, and extent of intervenor discovery and possible concerns or objections; and, provided further, that intervenors should not be allowed access to CEII, at least not without the Energy Bureau conducting further processes addressing the stated reasons for access requests and assessment of the concerns and necessary and reasonable limits and protections.</p>
2.03(C)(1)(e)	Prior Load Forecast Evaluation	<p>Sec. 2.03(C)(1)(e) requires an evaluation of the annual accuracy of the load forecasts provided in the prior IRP, an explanation of any significant deviations, and an explanation of the impact that demand-side resources had on the prior forecast.</p> <p>PREPA seeks a waiver because Hurricanes Irma and Maria rendered prior forecasts of load not relevant and not useful for this sort of backward-looking analysis.</p>
2.03(D)(c)(viii)	Existing Supply-Side Resource Supplemental Data	<p>Sec. 2.03(D)(c)(viii) requires a description of how each existing supply-side resource in Appendix 5 contributes to meeting the requirement of "high efficiency" generation, as defined by the Energy Bureau in accordance</p>

		<p>with Section 6.29(a) of Act 57-2014.</p> <p>PREPA seeks a waiver because the Energy Bureau has not yet defined "high efficiency" generation. See Docket No. CEPR-MI-2016-0001.</p>
2.03(F)(4)(b)	New Storage Resource Identification	<p>Sec. 2.03(F)(4)(b) requires a valuation framework for energy storage options that includes the value of ancillary services, load-shaping services, and locational benefits.</p> <p>PREPA seeks a limited waiver because the IRP evaluates and contemplates that battery energy storage systems will provide: (i) reserves, including locational benefits for MiniGrid reserve requirements; (ii) generation shifting/load shaping by taking the excess solar PV generation during the day and delivering it at night; and (iii) loss reduction because the systems are located near load centers.</p>
2.03(J)(1)(a)(ii) and (iii)	Existing Transmission Facilities Description	<p>Sec. 2.03(J)(1)(a)(ii) requires a discussion of whether the transmission system constrains the transfer of electricity from existing projects, potential new projects, or projects under development, including a description of the ability to interconnect intermittent renewable generation projects and microgrids.</p> <p>Sec. 2.03(J)(1)(a)(iii) requires a map of the subtransmission network showing transfer limits.</p> <p>PREPA seeks a limited waiver because the loadflow analysis indicates that there are no important constraints imposed by the transmission system on generation dispatch, although many transmission investments are needed for a number of identified purposes. The only constraint identified referred to the need for synchronous condensers.</p>
2.03(J)(1)(b)(i)	Existing Distribution Facilities Description	<p>Sec. 2.03(J)(1)(b)(i) requires a description of PREPA's existing distribution system that includes load flow by voltage class and considers any thermal overloading of distribution circuits, and any voltage variations on distribution circuits that do not comply with</p>



		<p>applicable standards.</p> <p>PREPA seeks a waiver because this description requires extensive effort and highly-detailed studies that were not possible to prepare for submission with the IRP, including a Distribution Master Plan, which would require an effort similar to the full IRP presented.</p>
2.03(J)(1)(c)	Existing Advance Grid Technologies Description	<p>Sec. 2.03(J)(1)(c) requires identification of areas within the service territory where advanced meters and other advanced grid technologies have been installed, plans to expand integration of any such technologies, and a brief description of the technologies.</p> <p>PREPA seeks a waiver because, to date, only pilot projects exist. There are no full-fledged installations.</p>
2.03(J)(1)(d)(ix) and (x)	Planned Transmission Facilities Description	<p>Sec. 2.03(J)(1)(d)(ix) requires a high-level analysis of the ability of PREPA's transmission system to permit power interchange with microgrids and independent power producers, including examples of interconnection studies from recent renewable integration projects.</p> <p>Sec. 2.03(J)(1)(d)(x) requires a diagram showing PREPA's import and export transfer capabilities and identifying limiting elements during each season of the next ten years, as well as a list of transmission loading relief procedures called during the last two seasons for which data is available.</p> <p>PREPA seeks a limited waiver because the IRP includes a loadflow analysis of the MiniGrid configuration under two conditions: (i) the microgrids are radially connected to the MiniGrid and are supplied by it; and (ii) the MiniGrid is operating alone without any microgrids connected to it.</p>
2.03(J)(1)(e)(i)	Planned Distribution Facilities Description	<p>Sec. 2.03(J)(1)(e)(i) requires that PREPA's distribution development plan include load flow analysis by voltage class of the electric utility's distribution system performance that considers thermal overloading of distribution circuits and equipment, and voltage variations on</p>

		<p>distribution circuits that do not comply with applicable standards.</p> <p>PREPA seeks a limited waiver because description requires extensive effort and highly-detailed studies that were not possible to prepare for submission with the IRP, including a Distribution Master Plan, which would require an effort similar to the full IRP presented. However, the IRP does include a screening study which identifies feeders that could have issues in integrating distributed generation.</p>
2.03(J)(2)(a)	Transmission and Distribution System Analysis	<p>Sec. 2.03(J)(2)(a) requires an identification of PREPA's transmission standards and confirmation that the standards are in compliance with the North American Electric Reliability Corporation; if any standards are not in compliance, it requires an explanation of the inconsistency.</p> <p>PREPA seeks a limited waiver because this information is addressed in the Transmission Report, where the lines are assumed not to be in compliance, and projects are included to bring the most critical lines into compliance, in works being coordinated with FEMA and COR3.</p>
2.03(J)(2)(c)	Transmission and Distribution System Analysis	<p>Sec. 2.03(J)(2)(c) requires identification of thermal and voltage reliability issues in PREPA's transmission and distribution systems.</p> <p>PREPA seeks a limited waiver with respect to the requirement to identify thermal and voltage reliability issues in the distribution system. This identification process would require a significant, long-term study, which has not been conducted in preparation for the IRP. The IRP includes the required information with respect to the transmission system.</p>
2.03(N)	Demand-Side Resources Status Update	<p>Sec. 2.03(N) requires an assessment of new and contracted demand-side energy and capacity projects, including energy efficiency, demand response, distributed generation, and</p>

		load control programs. PREPA seeks a waiver because there is no active demand-side program. The Modified IRP provided for further steps regarding energy efficiency and demand response programs that were not in PREPA's control.
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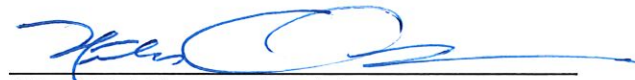
Accordingly, PREPA respectfully submits that the Energy Bureau should grant the above limited waivers of filing requirements in Regulation No. 9021.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Honorable Puerto Rico Energy Bureau grant the above limited waivers of Regulation No. 9021.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 13<sup>th</sup> DAY OF FEBRUARY, 2019

**PUERTO RICO ELECTRIC POWER AUTHORITY**




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**CERTIFICATION OF FILING AND SERVICE**

I hereby certify that on February 13, 2019, I have filed the above Motion with the Puerto Rico Energy Commission at the office of the Clerk of the Puerto Rico Energy Bureau, at the Seaborne Building Plaza (old World Plaza Building), 268 Muñoz Rivera Avenue, Plaza Level, Suite 202, San Juan, Puerto Rico, 00918; and, further, at approximately the same time, that courtesy copies of the Motion were sent via to the Energy Bureau via email to [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov) and [mcintron@energia.pr.gov](mailto:mcintron@energia.pr.gov), and to the office of the Energy Bureau's internal legal counsel via email to [legal@energia.pr.gov](mailto:legal@energia.pr.gov) and [sugarte@energia.pr.gov](mailto:sugarte@energia.pr.gov).



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