

GOVERNMENT OF PUERTO RICO  
PUERTO RICO ENERGY BUREAU

2019 JUN 14 PM 12:10

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

No. CEPR-AP-2018-0001

**SUBJECT:** PREPA's Cover Filing,  
Updated List of Documents Filed or  
Submitted, and Motions

**PREPA's Cover Filing, Updated List  
of Documents Filed or Submitted, and Motions**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and respectfully submits to the Puerto Rico Energy Bureau (the "Energy Bureau")<sup>1</sup> PREPA's Cover Filing, Updated List of Documents Filed or Submitted, and Motion. This Cover Filing (1) addresses the integrated resource plan ("IRP")-related materials filed or submitted today; (2) provides an updated list of the IRP-related materials filed or submitted between June 7, 2019, and today; and (3) presents a motion.

**I. MATERIALS FILED OR SUBMITTED TODAY**

**A. DIRECT TESTIMONY**

The Direct Testimony relates to the Integrated Resource Plan ("IRP") that PREPA filed with the Energy Bureau on June 7, 2019. PREPA is required to submit Direct Testimony under the Energy Bureau's Integrated Resource Plan ("IRP") regulation, Reg. No. 9021, § 3.06, and Bureau orders, including the Bureau's June 5, 2019, Resolution and Order setting the testimony due date as June 14, 2019. In addition, PREPA is required to provide a chart of the witnesses and of which portions of the IRP they address / support. Reg. No. 9021, § 3.06(A).

<sup>1</sup> References in this Petition to the Energy Bureau include the former Puerto Rico Energy Commission.

The following chart lists the witnesses providing Direct Testimony explaining and in support of the IRP, and the chart also identifies the portions of the IRP that their testimony addresses / supports.

<b>PREPA Ex. Nos.</b>	<b>Witness</b>	<b>Title</b>	<b>Subjects of Testimony</b>	<b>Portions of IRP Explained and Supported</b>
Exs. 3.0, 3.01, 3.02	José F. Ortiz Vazquez	Executive Director and Chief Executive Officer, PREPA	Executive Director and CEO Mr. Ortiz (an electrical engineer) formally submits the IRP filing; briefly discusses the context of the IRP; presents the PREPA Governing Board's Resolution from February 2019 relating to the IRP; identifies the other PREPA witnesses and their subjects; and, requests Energy Bureau approval of the IRP, including the Action Plan	See cell to the left. The substance of the Action Plan is discussed in the IRP main Report primarily in Parts 8 and 10.
Exs. 4.0, 4.01	Todd W. Filsinger	Chief Financial Advisor, PREPA (Filsinger Energy Partners)	CFA Mr. Filsinger explains, at a high level, the IRP, including the Action Plan, and the reasons PREPA proposes the Action Plan.	See cells to the left and above.
Exs. 5.0, 5.01	Matthew Lee	Managing Consultant, Filsinger Energy Partners	Mr. Lee supports in more detail the Action Plan, describes its relationship to the other Scenarios considered in the IRP, and explains the manner in which it incorporates elements of those Scenarios. He also supports the Action Plan and its compliance with Reg. No. 9021, including § 2.03(H)(2)(d).	See cells to the left and above.

<b>PREPA Ex. Nos.</b>	<b>Witness</b>	<b>Title</b>	<b>Subjects of Testimony</b>	<b>Portions of IRP Explained and Supported</b>
Exs. 6.0, 6.01	Dr. Nelson Bacalao	Senior Consulting Manager, Siemens Power Technologies International	<p>Dr. Bacalao is the lead outside Siemens consultant in the preparation of the IRP. His testimony supports the development of the IRP (including the advance extensive stakeholder processes) and the contents of the IRP, subject to the additional support provided by the other witnesses.</p> <p>Please note that Dr. Bacalao is testifying on behalf of the Siemens team that worked on the IRP.</p>	<p>The entire IRP, subject to the support provided by the other witnesses.</p> <p>Please note that, if specific issues are raised with respect to the IRP, then PREPA may identify additional witnesses to provide rebuttal and/or technical hearing testimony.</p>



PREPA Ex. Nos.	Witness	Title	Subjects of Testimony	Portions of IRP Explained and Supported
Exs. 7.0, 7.01	Efran Paredes Maisonet	Director, Planning and Environmental Protection Division, PREPA	<p>Engineer Mr. Paredes briefly discusses the "RFP" process used to select Siemens as the IRP consultant. He also supports data inputs provided by PREPA to Siemens that were used in the IRP. He also generally addresses PREPA's compliance with applicable Energy Bureau requirements, including PREPA's posting the public version of the IRP on its web site.</p> <p>Please note that Engineer Mr. Paredes is testifying on behalf of the PREPA personnel involved in working with Siemens on the IRP.</p>	<p>See cell to the left. In brief, Engineer Mr. Paredes is supporting PREPA data inputs to the IRP.</p> <p>See also note above regarding potential additional witnesses at later stages of the docket.</p>

## B. OTHER MATERIALS

PREPA also is filing or submitting today:

- (1) PREPA Ex. 1.01C -- a public document regarding the "MiniGrids" proposal in PREPA's June 1, 2019, IRP filing, that is based on IRP Appendix 1, Section 2.3 (and its subsections);
- (2) the chart required by the Energy Bureau's March 14, 2019, order that cross-references the Appendix to the March 14<sup>th</sup> order and the IRP filing; and
- (3) the information required by the March 14<sup>th</sup> order in relation to Section VIII.C.3 of the Energy Bureau's September 23, 2016, final Order in the 2015 IRP case, no. CEPR-AP-2015-0002, provided that PREPA will provide some of this voluminous information as soon as possible, as discussed later in this filing.

PREPA also is submitting today the final required electronic work papers on a USB drive. The final electronic work papers that are being submitted today together with the electronic work papers submitted earlier this week collectively constitute PREPA Ex. 2.0. Please note that certain of the electronic work papers are confidential, as indicated in the file names, and they should be treated as confidential.

Please note that if any of the other material cannot practically be printed out in hard copy form, then it will be provided in electronic form on the USB drive.

## II. UPDATED LIST OF FILINGS / SUBMISSIONS AS OF TODAY

The June 7, 2019, filing, as supplemented through today, consists of:

- (1) The June 7, 2019, Cover Filing (subject to the updates and corrections made by the instant Cover Filing).
- (2) PREPA Ex. 1.0: The IRP main Report and Attachment A<sup>2</sup>
- (3) PREPA Exs. 1.01A through 1.01C
  - a. 1.01A Appendix 1 (Confidential version)
  - b. 1.01B Appendix 1 (public fully redacted version)
  - c. 1.01C public MiniGrids document based on IRP Appendix 1, Section 2.3 (and its subsections) (filed today)
- (4) PREPA Exs. 1.02A through 1.02 D – Appendix 3 split into four documents<sup>3</sup>
- (5) PREPA Ex. 1.03 – Appendix 4
- (6) PREPA Ex. 1.04 – Appendix 5
- (7) PREPA Ex. 2.0 – the electronic work papers (filed this week through today)
- (8) The instant June 14, 2019, cover filing (filed today)

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<sup>2</sup> There is no Attachment B.

<sup>3</sup> There is no Appendix 2, in accordance with the waiver granted by the March 14<sup>th</sup> order.

- (9) PREPA Exs. 3.0, 3.01, 3.02, 4.0, 4.01, 5.0, 5.01, 6.0, 6.01, 7.0, and 7.01 – the Direct Testimony (including attachments) (filed today)
- (10) The chart and the additional information referenced above (filed or submitted today, subject to the proviso that some of the information will not be submitted today, as discussed later in this filing)

### III. MOTIONS

#### A. March 14<sup>th</sup> Order and IRP Regulation Section 2.03(H)

The March 14<sup>th</sup> Order indicates that, with respect to PREPA's February 13<sup>th</sup> IRPO filing and the Energy System Modernization ("ESM") Plan Scenario as presented in the February 13<sup>th</sup> IRP, PREPA should have sought a waiver of IRP Regulation No. 9021, § 2.03(H)(2)(a).

The IRP main Report filed on June 7, 2019, and the Direct Testimony of Dr. Nelson Bacalao being filed today, show and discuss how the ESM was the subject of Long-Term Capacity Expansion ("LTCE") model runs like the other Scenarios, including the very similar, in most respects, "S4S2" Plan.

The new IRP main Report and today's testimony of Dr. Bacalao and other witnesses, including Managing Consultant Matthew Lee, discuss the differences and commonalities between the ESM Plan and the S4S2 Plan and, with respect to PREPA's proposed Action Plan / Preferred Resource Plan, collectively are intended to provide the information required by Reg. No. 9021, Section 2.02(H), including but not limited to subsection 2.02(H)(2)(d)(iii).

The relevant facts on those subjects are described in great detail in the IRP main Report and the applicable testimony. PREPA will not repeat all of that material here.

PREPA respectfully submits that the circumstances of the new IRP differ significantly from the circumstances discussed in the relevant part of the March 14<sup>th</sup> order



(on p. 11). PREPA respectfully believes that the IRP main Report and the applicable testimony show how the LTCE models were run in relation to the ESM and other Scenarios, that the model approaches were proper and reasonable and did not incorrectly interfere with the IRP analysis, and that PREPA has complied with the applicable regulatory requirements relating to the ESM and the other Scenarios.

However, in the alternative, if the Energy Bureau concludes that PREPA also must or should seek a waiver of Section 2.03(H)(2)(a), then PREPA respectfully requests such a waiver. PREPA respectfully submits that such a waiver, if needed, is entirely warranted for the detailed reasons relating to how the ESM was analyzed reflected in the IRP main Report and the applicable testimony.

**B. Additional Information**

As PREPA has stated earlier in this filing, PREPA will not be able to submit today some of the voluminous information required by the March 14<sup>th</sup> order in relation to Section VIII.C.3 of the Energy Bureau's September 23, 2016, final Order in the 2015 IRP case. PREPA apologizes for this situation. PREPA respectfully asks for permission to file the remainder of this information as soon as possible.

WHEREFORE, for the reasons stated above, and based on the IRP filing and the Direct Testimony and other associated materials, the Puerto Rico Electric Power Authority respectfully requests that the honorable Puerto Rico Energy Bureau accept the Direct Testimony and the associated materials filed or submitted from June 7, 2019, through today; approve PREPA's Integrated Resource Plan, including the Action Plan; grant PREPA's motions; and make such other findings, conclusions, and orders as are needed for purposes of this IRP docket and are supported by the record of this case and the applicable law.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 14<sup>th</sup> DAY OF JUNE, 2019

**PUERTO RICO ELECTRIC POWER AUTHORITY**



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