

COMMONWEALTH OF PUERTO RICO PUERTO RICO ENERGY BUREAU

2019 JUN 28 PM 3: 22

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY INTEGRATED RESOURCE PLAN NO. CEPR-AP-2018-0001

SUBJECT: PREPA'S COMPLIANCE FILING RE JUNE 27, 2019, ORDER

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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") PREPA's Compliance Filing pursuant to the Energy Bureau's Resolution and Order of June 27, 2019, relating to PREPA's request for approval of the proposed Siemens PTI Contract amendment.

1. The Energy Bureau's June 27th order, in brief, requires PREPA to file on June 28, 2019, by 5:00 p.m. AT: (a) "a copy of the Siemens proposal in which the consultant includes a breakdown of the expected work (i.e., additional or remaining work) and the amount / costs associated to each task and all information ordinarily included in a proposal for a client to evaluate the reasonability of the costs of the services that would be received from the consultant (i.e., rates, estimated / expected amount of hours per task, etc.)"; (b) "true and correct copies of all invoices submitted by Siemens to PREPA under the existing contract"; and (c) "true and correct copies of ... documentation evidencing of all the payments made by PREPA to Siemens under the existing contract".

- 2. PREPA has attached hereto: (a) a copy of Siemens CR-8 proposal, which is the latest proposal; (b) copies of the invoices received to date; and (c) documentation of the payments to date.
- 3. PREPA appreciates that the Energy Bureau's June 27th order recognizes that this is an urgent item in order for PREPA and Siemens to be able to meet due dates set by the Energy Bureau, including the compliance filing due on July 17, 2019. PREPA respectfully urges the Energy Bureau to approve the proposed Contract amendment as soon as is reasonably possible.
- 4. PREPA notes again that, while the vast majority of the work under the Contract and the proposed Contract amendment are for this 2018 IRP case, some of the work is related work to support PREPA Planning needs.
- 5. Finally, PREPA again respectfully urges the Energy Bureau to factor into its consideration of this subject the high degree of difficulty of identifying in advance all of the work that will be required in this 2018 IRP case. The scope and depth of future work are not in PREPA's or Siemen's control or ability to forecast in many respects, such as the positions and discovery requests of intervenors, and further directives or requests from the Energy Bureau and its staff.

WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Honorable Puerto Rico Energy Bureau accept this Compliance Filing, approve the proposed Siemens Contract amendment as soon as reasonably practical, and enter any other relief as is warranted.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 28th DAY OF JUNE, 2019

PUERTO RICO ELECTRIC POWER AUTHORITY

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CERTIFICATION OF FILING AND SERVICE

I hereby certify that on June 28, 2019, I have filed the above Compliance Filing with the referenced attachments with the Puerto Rico Energy Bureau at the office of the Clerk of the Puerto Rico Energy Bureau; and, further, at approximately the same time, that courtesy copies of the Motion were sent via email without the attachment to the Puerto Rico Energy Bureau via email to secretaria@energia.pr.gov and wcordero@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.

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