

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

2019 JUN 27 PM 3: 23

IN RE: THE PUERTO RICO ELECTRIC  
POWER AUTHORITY

INITIAL RATE REVIEW

NO. CEPR-AP-2015-0001

**SUBJECT:** PREPA's Motion to Make  
Confidentiality Designations *Nunc Pro Tunc*  
for June 19 and 21 Filings  
Supporting Documents

**PREPA'S MOTION TO MAKE CONFIDENTIALITY  
DESIGNATIONS *NUNC PRO TUNC* FOR  
JUNE 19 AND 21 FILINGS SUPPORTING DOCUMENTS**

The Puerto Rico Electric Power Authority ("PREPA") hereby respectfully submits to the Puerto Rico Energy Bureau (the "Energy Bureau") this Motion to make Confidentiality Designations *Nunc Pro Tunc* for June 19 and 21 Filings Supporting Documents.

1. The two supporting documents filed with PREPA's June 19, 2019 compliance filing, and the twelve supporting documents filed with PREPA's June 21, 2019, quarterly and annual riders factors and reconciliations filing, due to an internal misunderstanding at PREPA, mistakenly were not designated as confidential when filed.

2. The documents should be designated as confidential as they include formulas, calculations and procedures deemed proprietary information (e.g. technical information, intellectual property) from PREPA that could be used by third parties and should not be made public as filed. Puerto Rico law protects trade secrets, including proprietary information, as previously have been briefed in this docket.

3. The "non-designation" of the fourteen documents was inadvertent. The PREPA employee who previously prepared attachments for PREPA filings of this nature relatively recently retired. The PREPA employees who assembled the supporting

documents for the June 19 and 21 filings understood that the supporting documents would be supplied to the Energy Bureau but did not understand that the documents would be posted on the Bureau's web site "as is" or treated as public. This misunderstanding first was identified on the afternoon of June 25, 2019, as mentioned in the June 26, 2019, Technical Conference Call, along with the intention to submit this Motion.

4. PREPA apologizes for the internal misunderstanding and respectfully requests that the Energy Bureau allow PREPA to make these designations *nunc pro tunc* and that the Energy Bureau remove the fourteen documents (all in Excel format and listed below) from its web site pages for this docket and treat them as confidential.

a. June 19, 2019 Compliance Filing material

- i. Exhibit 1 – RecCompFiling-Prov-CELI-Subs-Fuel-PP(HurrPeriod)-20190619 (1)
- ii. Reconciliations Supporting File 1-20190619

b. June 21, 2019 Compliance Filing material

- i. Supporting Data – Calculo costo del CELI 2020 (21062019)
- ii. Supporting Data – clientes mensuales 2020
- iii. Supporting Data – Despacho Combustible
- iv. Supporting Data -Distribución mensual 2020 (FOMB MACRO)
- v. Supporting Data -Ingresos mensuales 2020 (21062019)
- vi. Supporting Data – Public lighting 2020 (21062019)
- vii. Supporting Data – Subsidies Rider Cost Budget Forecast (21062019)

- viii. Supporting Data – Subsidios 2020 (21062019)
- ix. Riders Scenarios – DRAFT-PROPOSED Factores Ajuste 2019 July Filing 20190620 – ESC1
- x. Riders Scenarios – DRAFT-PROPOSED Factores Ajuste 2019 July Filing 20190620 – ESC2
- xi. NEPR Filing – Filing 06192019 -Exhibit 1 – RecCompFiling-Prov-CELI-Subs-Fuel-PP(HurrPeriod)-20190619
- xii. NEPR Filing – Filing 06192019 -Reconciliations Supporting File 1-20190619

5. Included on a USB drive submitted with this Motion, PREPA provides replacement documents showing values (all in Excel format and listed below), but with the confidential components removed, in order for the Energy Bureau to upload these versions on its web site for public review.

- a. June 19, 2019 Compliance Filing material
  - i. Filing 06192019 -Exhibit 1 - RecCompFiling-Prov-CELI-Subs-Fuel-PP(HurrPeriod)-Values
  - ii. Filing 06192019 -Reconciliations Supporting File 1-Values
- b. June 21, 2019 Compliance Filing material
  - i. Calculo costo del CELI 2020 (21062019) - values
  - ii. clientes mensuales 2020 - values
  - iii. Despacho Combustible - values
  - iv. distribucion mensual 2020 (FOMB MACRO) - values
  - v. Ingresos mensuales 2020 (21062019) - values

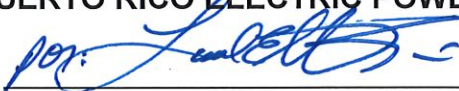
- vi. Public lighting 2020 (21062019) - values
- vii. Subsidies Rider Cost Budget Forecast (21062019) - values
- viii. Subsidios 2020 (21062019) - values
- ix. DRAFT-PROPOSED Factores Ajuste 2019 July Filing 20190620 -  
ESC1 - values
- x. DRAFT-PROPOSED Factores Ajuste 2019 July Filing 20190620 -  
ESC2 - values
- xi. Filing 06192019 -Exhibit 1 - RecCompFiling-Prov-CELI-Subs-Fuel-  
PP(HurrPeriod)-Values
- xii. Filing 06192019 -Reconciliations Supporting File 1-Values

**WHEREFORE**, the Puerto Rico Electric Power Authority respectfully requests that the Puerto Rico Energy Bureau grant this motion, treat the fourteen supporting documents as confidential, remove the fourteen supporting documents from the Bureau's public web site, post the replacement documents, and, enter such other orders, if any, as are warranted.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 27<sup>th</sup> DAY OF JUNE, 2019

**PUERTO RICO ELECTRIC POWER AUTHORITY**



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## FILING AND SERVICE

I **HEREBY CERTIFY** that the foregoing Motion was, on June 27, 2019, filed in person with a USB drive with copies of the replacement documents at the office of the Clerk of the Puerto Rico Energy Bureau; and, further, that the Motion at approximately the same time was sent via email without the attachments to the Puerto Rico Energy Bureau through email to [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov) and [wcordero@energia.pr.gov](mailto:wcordero@energia.pr.gov); 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); and to parties of record at the following email addresses: [codiot@oipc.pr.gov](mailto:codiot@oipc.pr.gov); [jperez@oipc.pr.gov](mailto:jperez@oipc.pr.gov); [cfl@mcvpr.com](mailto:cfl@mcvpr.com); [ivc@mcvpr.com](mailto:ivc@mcvpr.com); [pnieves@vnblegal.com](mailto:pnieves@vnblegal.com); [mmuntanerlaw@gmail.com](mailto:mmuntanerlaw@gmail.com); [maribel.cruz@acueductospr.com](mailto:maribel.cruz@acueductospr.com); [jfeliciano@constructorespr.net](mailto:jfeliciano@constructorespr.net); [abogados@fuerteslaw.com](mailto:abogados@fuerteslaw.com); [eirizarry@ccdlawpr.com](mailto:eirizarry@ccdlawpr.com); [jose.maeso@aae.pr.gov](mailto:jose.maeso@aae.pr.gov); [edwin.quinones@aae.pr.gov](mailto:edwin.quinones@aae.pr.gov); [nydinmarie.watlington@cemex.com](mailto:nydinmarie.watlington@cemex.com); [aconer.pr@gmail.com](mailto:aconer.pr@gmail.com); [epenergypr@gmail.com](mailto:epenergypr@gmail.com); [jorgehernandez@escopr.net](mailto:jorgehernandez@escopr.net); [ecandelaria@camarapr.net](mailto:ecandelaria@camarapr.net); [pga@caribe.net](mailto:pga@caribe.net); [manualgabrielfernandez@gmail.com](mailto:manualgabrielfernandez@gmail.com); [mreyes@midapr.com](mailto:mreyes@midapr.com); [agraitefe@agraitlawpr.com](mailto:agraitefe@agraitlawpr.com); [mgrpcorp@gmail.com](mailto:mgrpcorp@gmail.com); [attystgo@yahoo.com](mailto:attystgo@yahoo.com).



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