

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

2019 AUG - 1 PM 2:54

PROF. SECRETARIA
NEGOCIADO DE ENERGIA
DE PUERTO RICO

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| IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY INTEGRATED RESOURCE PLAN | CASE NO. CEPR-AP-2018-0001 SUBJECT: REQUEST TO APPEAR AS AMICUS CURIAE |
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MOTION IN COMPLIANCE WITH ORDER

TO THE PUERTO RICO ENERGY BUREAU:

NOW COME CENTRO UNIDO DE DETALLISTAS (CUD); CAMARA DE MERCADEO, INDUSTRIA Y DISTRIBUCION DE ALIMENTOS (MIDA); PUERTO RICO MANUFACTURES ASSOCIATION (PRMA); COOPERATIVA DE SEGUROS MULTIPLES DE PUERTO RICO (CSMPR), UNIDOS POR UTUADO (UPA), Y EL INSTITUTO DE COMPETITIVIDAD Y SOSTENIBILIDAD ECONOMICA DE PUERTO RICO (ICSE-PR) (hereinafter the not profit intervenors) through its undersigned attorney and respectfully allege and pray:

1. On July 30, 2019 appearing parties filed a motion, wrongly titled, "Request for Intervention as Amicus Curiae".
2. On July 31, 2019 the Bureau ordered:

"Therefore, the Energy Bureau GRANTS the Non Profit Interventions until 12:00 p.m. on August 2, 2019, to (i) clarify its intent of participation in the instant case; (ii) modify its Request accordingly; and (iii) comply with the provisions of Section 5.05 and 7.01 of Regulation 8543".
3. The appearing parties understand that they are legitimate parties to the IRP proceedings.
4. As a varied group of major players in the energy filed, the appearing parties represent not only direct economic interests related to the approval and the

implementation of the IRP, but also bring particular experts and direct participation on whether the proposal IRP is consistent with Law 17 of 2019.

The appearing parties actively participated in the conceptualization and approval of Law 17. The approval the implementation of the IRP directly impacts the capacity of these parties to benefit economically from the IRP if it is in full compliance of Law 17.

5. Section 5.05 of Regulation 8543 state in Spanish:

“Sección 5.05.- Solicitudes de Intervención
Cualquier persona que tenga un interés legítimo en un caso ante la Comisión podrá presentar una petición debidamente fundamentada para que se le permita intervenir o participar en dicho caso.
La Comisión evaluará y atenderá la petición conforme a los criterios establecidos en la Ley Núm. 170 de 12 de agosto de 1988, según enmendada, conocida como la Ley de Procedimiento Administrativo Uniforme, y su jurisprudencia interpretativa.”

6. Appearing parties clearly have a legitimate interest due to the direct economic impact the IRP has in their operation and in their options of distributed energy available.

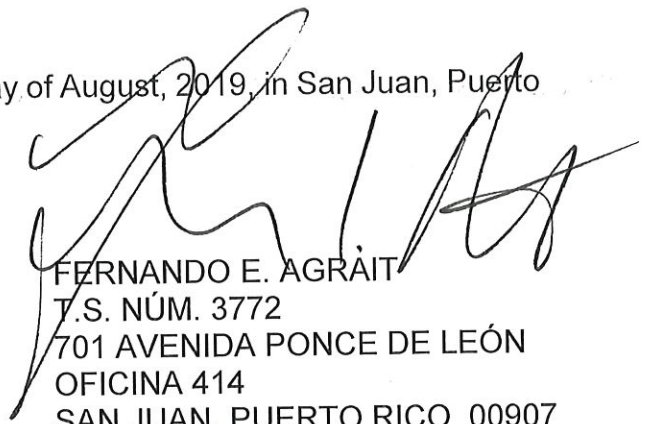
WHEREFORE the appearing parties respectfully request to be accepted as intervenors.

CERTIFICATION

I also certify that on this date a copy of this motion regarding the Case No. CEPR-AP-2018-0001 was notified by electronic mail to the following: n-vazquez@aeepr.com.

Puerto Rico Electric Power Authority
Nitza D. Vázquez Rodríguez
PO Box 363928
San Juan, Puerto Rico 00936-4267

RESPECTFULLY SUBMITTED this 1st day of August, 2019, in San Juan, Puerto Rico.



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