

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

NEPR

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IN RE:

NO. CEPR-AP-2018-0001

INTEGRATED RESOURCE PLAN
FOR THE PUERTO RICO
ELECTRIC POWER AUTHORITY

SUBJECT: PETITION OF
SHELL NA LNG LLC
TO INTERVENE

PETITION OF SHELL NA LNG LLC

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW Shell NA LNG LLC (“SNALNG”) and respectfully submits the following Petition of Shell NA LNG LLC to Intervene, pursuant to Section 3.03 of Regulation No. 9021, known as the Regulation on Integrated Resource Plan (“IRP”) for the Puerto Rico Electric Power Authority (“PREPA”), and Section 5.05 of Regulation 8543, known as the Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Procedures.

Section 3.03 of Regulation No. 9021 references Section 3.5 of Act 38-2017, which evaluates a petition to intervene on the following points:

- 1) Whether the petitioner’s interests may be adversely affected by the proceeding;
- 2) Whether there are no other means in law for the petitioner to adequately protect its interest;
- 3) Whether the petitioner’s interest is already adequately represented by the parties to the proceeding;
- 4) Whether the petitioner’s participation can reasonably assist in preparing a more complete record of the procedure;
- 5) Whether the petitioner’s participation may extend or excessively delay the procedure;

- 6) Whether the petitioner represents or is a spokesperson for other groups or entities of the community; and,
- 7) Whether the petitioner may provide information, expertise, or technical advice that would not otherwise be available in the proceeding.

I. Whether the Petitioner's Interest may be Adversely Affected by the Proceeding and Whether There are No Other Means in Law for the Petitioner to Adequately Protect its Interest

SNALNG, a wholly-owned indirect subsidiary of Royal Dutch Shell PLC ("Shell"), is a supplier of liquified natural gas ("LNG"). The IRP approved in this proceeding is likely to include gas-fired generation, including gas-fired distributed generation, it will require LNG to be imported into Puerto Rico. To the extent that there is opposition to natural gas being part of PREPA's fuel mix or unreasonable constraints on the use of natural gas are proposed, SNALNG must be able to demonstrate the importance of natural gas in providing a resilient and economical supply portfolio. SNALNG would be adversely affected if the final IRP includes obstacles to the import and consumption of LNG or if it somehow discriminated against SNALNG in favor of competitors. Participation in this proceeding is the only way SNALNG can protect its interests.

II. Whether the Petitioner's Interest is Already Adequately Represented by the Parties to the Proceeding and Whether the Petitioner Represents or is a Spokesperson for Other Groups or Entities

SNALNG's interests are not represented by any other party to this proceeding. SNALNG does not represent or speak for any other groups or entities, except to the extent that other Shell subsidiaries have information or expertise that is relevant and can be presented by SNALNG to aid the Bureau in building the record and making a decision in this matter. To the extent that other fuel suppliers become parties, they will likely be competitors to SNALNG, and it is unlikely that they or their affiliates have a range and depth of interests

that is similar to that of SNALNG and other Shell companies. In short, no other entity can effectively represent SNALNG's interests.

III. Whether The Petitioner's Participation Can Reasonably Assist in Preparing a More Complete Record and/or Provide Information, Expertise, or Technical Advice that Would Not Otherwise be Available in the Proceeding

SNALNG and its affiliates are equipped to address several aspects of PREPA's IRP. Shell is among the largest transporters and sellers of LNG in the world. While SNALNG's interests in this proceeding are primarily those of an LNG importer, certain of SNALNG's affiliates are involved in lines of business that are also directly relevant to power generation and management. Shell Energy North America, SNALNG's affiliate, is among the five largest power marketers (by volume) in the United States. It controls over 5,000 MW of gas-fired generation capacity and supplies natural gas to numerous utilities and competitive generators. Shell Energy and its subsidiary MP2 serve large retail power customers in several states. Shell New Energies is involved in numerous aspects of the global power industry, including renewable generation, battery storage, micro grids and retail power sales. This background gives SNALNG the expertise to contribute to record in several regards.

IV. Whether the Petitioner's Participation May Extend or Excessively Delay the Proceeding

Granting SNALNG's intervention will not prolong or delay this proceeding. PREPA filed its revised IRP on June 7, 2019. SNALNG filed this petition to intervene in a timely manner. The Bureau's review of the IRP is at its early stages. SNALNG will present its comments on PREPA's IRP within the scheduled timeline for this proceeding.

Based on the above, SNALNG respectfully requests that the Bureau grant this petition to intervene.

RESPECTFULLY SUBMITTED,

SHELL NA LNG LLC

A handwritten signature in black ink, appearing to be 'Paul De Moudt', written over a horizontal line.

Paul De Moudt
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CERTIFICATION OF FILING AND SERVICE

I hereby certify that on August 2, 2019, I have sent the above Petition to Intervene to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov>. A copy of this Petition was also notified by electronic e-mail to the Puerto Rico Energy Bureau's Clerk to secretaria@energia.pr.gov and wordero@energia.pr.gov; the Bureau's Office of Legal Affairs to legal@energy.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vazquez Rodriguez (n-vazquez@aepr.com); Astrid I. Rodriguez Cruz (astrid.rodriguez@prepa.com); and Jorge R. Ruiz Pabon (Jorge.ruiz@prepa.com).



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