

COMMONWEALTH OF PUERTO RICO  
PUERTO RICO ENERGY BUREAU

SRSP - SECRETARIA  
NEGOCIADO DE ENERGIA  
DE PUERTO RICO

2019 JUL 29 PM 3:48

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

NO. CEPR-AP-2018-0001

**SUBJECT:** PREPA's Motions for (1)  
Extension of Time for Responses to the  
Energy Bureau's 2<sup>nd</sup> Set of ROIs and  
(2) Clarification or Modification of  
ROI 02-04(c)

**PREPA'S MOTIONS FOR (1) EXTENSION OF TIME FOR  
RESPONSES TO THE ENERGY BUREAU'S 2<sup>nd</sup> SET OF ROIs AND  
(2) CLARIFICATION OR MODIFICATION OF ROI 02-04(C)**

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 Motions for (1) Extension of Time for Responses to the Energy Bureau's 2<sup>nd</sup> Set of ROIs and (2) Clarification or Modification of ROI 02-04(c). The first part of the instant Motion relates to the August 5, 2019, deadline for responses to the Energy Bureau's July 18, 2019, "2<sup>nd</sup> Requirement of Information ("ROIs") to PREPA" and "2<sup>nd</sup> Requirement of Information to PREPA (Supplemental)". The second part of the instant Motion relates to the scope of ROI PREB-PREPA-02-04(c).

**Request for an Extension of Time**

1. On July 16, 2019, PREPA filed its Motion for Extension of Time Due to Status of Proposed Contract Amendment. PREPA's July 16<sup>th</sup> Motion related to two sets of items: (a) the Energy Bureau directives for additional modeling runs and data related to the AES conversion assessment and (b) the Energy Bureau's 1<sup>st</sup> set of ROIs, issued on July 11, 2019.

①

2. In brief, PREPA's July 16<sup>th</sup> Motion was based mainly on three points: (a) the timeline and then-pending status of PREPA's request for approval in full of a proposed Siemens contract amendment, to allow Siemens, PREPA's independent experts in this docket, to work on those two sets of items and other tasks; (b) the volume of work required by the AES-related items; and (c) the volume of work required by the 1<sup>st</sup> set of ROIs, which includes 56 ROIs, most of which have multiple subparts, and the unusually short amount of time, just 11 calendar days, set for responses to those ROIs. The Motion pointed out, among other things, that the Energy Bureau's September 24, 2015, 1<sup>st</sup> set of ROIs in the 2015 IRP case had only 29 ROIs plus subparts, but had a deadline for responses of 21 calendar days.<sup>1</sup> PREPA incorporates, without repeating, the relevant additional information in the July 16<sup>th</sup> Motion.

3. Later in the day, on July 16, 2019, the Energy Bureau issued its Resolution and Order approving the Siemens contract amendment, subject to certain conditions / ongoing requirements.

4. On July 18, 2019, the Energy Bureau issued its 2<sup>nd</sup> set of ROIs. The 2<sup>nd</sup> set of ROIs involves 27 ROIs, most of which with multiple subparts (one ROI alone has 17 subparts, some of which have their own additional subparts). The 2<sup>nd</sup> set of ROIs set a deadline for responses of 17 calendar days.

5. On July 23, 2019, the Energy Bureau issued its Resolution and Order that (a) set a new deadline of August 7 for the AES-related items (and imposing a fine on PREPA), as to which PREPA had received previous extensions of time; and (b) set a

---

<sup>1</sup> The Energy Bureau's December 23, 2015, 2<sup>nd</sup> set of ROIs in the 2015 IRP case had 3 ROIs plus subparts and a deadline of 20 calendar days; its February 10, 2016, 3<sup>rd</sup> set of ROIs had 7 ROIs plus subparts with a deadline of 20 calendar days; and its February 29, 2016, 4<sup>th</sup> set of ROIs also had 7 ROIs plus subparts with a deadline of 20 calendar days.

new deadline of August 2, at 12:00 pm, for PREPA's responses to the Energy Bureau's 1<sup>st</sup> set of ROIs, as to which PREPA had not received any prior extension of time. PREPA had requested longer extensions of item for those two sets of items, i.e., formulated as 21 days from approval and execution of the Siemens contract amendment. However, the order found a lack of merit in PREPA's grounds for its request as to the AES-related items although it did find merit in PREPA's grounds for its request as to the 1<sup>st</sup> set of ROIs although the order granted a shorter extension of time. The order did not address the new circumstance of the Energy Bureau's 2<sup>nd</sup> set of ROIs.

6. PREPA's responses to the 2<sup>nd</sup> set of ROIs, like the AES-related items and the responses to the 1<sup>st</sup> set of ROIs, will require extensive work. The August 5<sup>th</sup> deadline for responses to the 2<sup>nd</sup> set of ROIs, 17 calendar days, viewed in isolation, is short for the work required, and the responses to the 2<sup>nd</sup> set of ROIs now are due 2.5 days after the AES-related items and 2 days before the responses to the 1<sup>st</sup> set of ROIs.

7. Setting a new due date for the 2<sup>nd</sup> set of ROIs is warranted because of the amount of work required as such and in order to avoid "stacking" all three sets of items such that they are due in a 4.5 day period, which creates very significant practical problems, as indicated above.

8. PREPA accordingly respectfully requests that the due date for responses to the 2<sup>nd</sup> set of ROIs be extended to August 16, 2019.

**Request for Clarification or Modification of ROI 02-04(c)**

9. ROI PREB-PREPA-02-04-(b) asks: "Does PREPA measure hourly loads at the sub-island level in any locations? At what level of sub-island load does PREPA



measure hourly load? For example, does PREPA measure any hourly loads at the substation, region, district, or minigrid level?"

10. The answer to that ROI subpart is yes, PREPA measures the distribution substation load using electronic meters. Furthermore, PREPA, through its SCADA system, also measures the current for one of the three phases for most of its over 1,000 feeders and also demand for most of its substations, data of which can be obtained at different resolutions (time). It must be clarified, however, that data for time periods after Hurricane María will be misleading as a lot of reconfiguration to feeders occurred as part of the restoration effort and many feeders/substations are still carrying load (or not) which may show a behavior that is not representative of the final (and Pre-María) loading.

11. However, item PREB-PREPA-02-04-(c) then goes on to ask: "For any such hourly data available at the sub-island level provide such data in electronic format for the most recent 12-month period for which data are available."

12. That subpart (c) might be interpreted to require PREPA to provide data for over 300 substations and over 1000 feeders. In practical terms, that would be too much data to handle for this ROI, as it is data not readily available.

13. The subpart (c), however, does use the term "for which data are available".

14. PREPA accordingly respectfully seeks clarification, or modification, of that subpart (c) to allow PREPA to present representative data rather than to expend the inordinate effort to provide data for all substations and feeders.

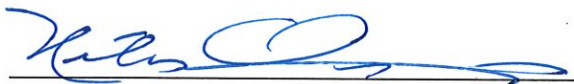
WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Honorable Puerto Rico Energy Bureau grant this Motion, extend the due date for responses to the 2nd set of ROIs to August 16, 2019, clarify or modify ROI 02-04(c) to allow the submission of representative data, and enter any other relief as is warranted.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 29th DAY OF JULY, 2019

PUERTO RICO ELECTRIC POWER AUTHORITY

I hereby certify that on this day, I have filed the above Motion with the Puerto Rico Energy Bureau in hard copy at the office of the Clerk of the Puerto Rico Energy Bureau; and, that courtesy copies of Motion were sent via email to the Puerto Rico Energy Bureau staff at [viacaron@energia.pr.gov](mailto:viacaron@energia.pr.gov); [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov); and to [legal@energia.pr.gov](mailto:legal@energia.pr.gov).



Nitza D. Vázquez Rodríguez  
TSPR No. 9311  
Senior Attorney  
Puerto Rico Electric Power Authority  
P.O. Box 363928  
San Juan, Puerto Rico 00936-3928  
Tel. 787-521-4499  
Email: [n-vazquez@aepr.com](mailto:n-vazquez@aepr.com)