



NEPR

Received:

Jul 30, 2019

2:47 PM

RE: Review of the Puerto Rico Electric Power Authority Integrated Resource Plan  
Case No.: CEPR-AP-2018-0001  
Subject: Petition of Rocky Mountain Institute to participate as Amicus Curiae  
By: Rocky Mountain Institute  
Date: August 1, 2019

Rocky Mountain Institute (RMI) respectfully submits the following petition to participate as Amicus Curiae.

Rocky Mountain Institute – an independent nonprofit founded in 1982 – transforms global energy use to create a clean, prosperous, and secure low-carbon future. It engages businesses, communities, institutions, and entrepreneurs to accelerate the adoption of market-based solutions that cost-effectively shift from fossil fuels to efficiency and renewables. RMI has offices in Basalt and Boulder, Colorado; New York City; Washington, D.C.; Oakland, California, and Beijing.

Since 2012, RMI's Islands Energy program has been accelerating the transition of island economies from a heavy dependence on fossil fuels to a diverse platform of clean energy and energy efficiency while establishing a blueprint for other island economies. Since Hurricanes Irma and Maria struck in 2017, RMI has been supporting the energy transition in Puerto Rico by: (1) convening and facilitating collaborative workshops to enable stakeholders to contribute to the transformation of energy policy and infrastructure; (2) providing direct, independent, expert input to technical advisory groups, including those convened by the Puerto Rico Senate, the Resilient Puerto Rico Advisory Commission, and the Southern States Energy Board; and (3) managing philanthropically backed solar and storage project deployment.

RMI will act as an independent expert contributor to the PREPA IRP proceeding. We will conduct thorough review and analysis of the proposed IRP and identify both its strengths in supporting the goals of Puerto Rico's energy public policy, and the opportunities to improve how it delivers on these goals. Our input to this process will build on extensive engagement in utility and energy sector transformation across both the United States and the Caribbean region. Through our participation in the 2018 Public Collaborative for Puerto Rico's Energy Transformation, several technical advisory groups described above, and in the Puerto Rico renewable energy market supporting philanthropic projects, we have a thorough understanding of the challenges and opportunities facing the island's energy system.

The Puerto Rico Energy Public Policy Act (17-2019) states "The electric power system should be reliable and accessible, promote industrial, commercial, and community development, improve the quality of life at just and reasonable cost, and promote the economic development of the Island." The law further declares as the public policy of the Government



of Puerto Rico “to promote the necessary changes in order to transform the Electric Power System into one that satisfies the energy needs of the 21<sup>st</sup> century Puerto Rico.”

Rocky Mountain Institute is well suited to provide independent expert input in support of this policy vision. In recent years we have served as direct advisors to energy regulators pursuing their own energy system transformations – including advising the Hawaii Public Utilities Commission on implementation of demand response and performance-based regulation, and aiding the New York Public Service Commission’s Reforming the Energy Vision process – and to leading U.S. utilities such as Green Mountain Power and Consolidated Edison in their own energy innovation programs. RMI has supported utilities and governments (in Saint Lucia, Saint Vincent and the Grenadines, Belize, the Turks and Caicos Islands, and other island grids) to develop integrated resource plans by providing analytical support, project management, and advisory input. RMI led integrated resource planning in Malawi, with coordination among the generation and supply utilities, government, and key development partners. RMI believes strongly in the importance of analytically rigorous, participatory, and properly overseen integrated resource plans that consider all available options to pursue ratepayer benefit.

RMI respectfully requests that the Bureau grant this petition to participate as Amicus Curiae.

*Richenda Van Leeuwen*

Richenda Van Leeuwen  
Managing Director  
Rocky Mountain Institute