

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

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

NO. CEPR-AP-2018-0001

SUBJECT: PREPA's Compliance re
August 13 Presentation Documents
and Confidentiality Designations

**PREPA'S COMPLIANCE RE AUGUST 13 PRESENTATION
DOCUMENTS AND CONFIDENTIALITY DESIGNATIONS**

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 Compliance re August 13 Presentation Documents and Confidentiality Designations. PREPA, in this Compliance filing, is providing its three Presentation Documents for the August 13, 2019, Initial Technical Hearing, Part I, in compliance with the Energy Bureau's Resolution of July 26, 2019. One of the three Presentation Documents has three versions: Public, Confidential, and Confidential with CEII (Critical Energy Infrastructure Information). PREPA seeks approval of the confidentiality designations.

The First Presentation Document

The first document, with the file name 01 PREPA_IRP_ActionPlan_PREB_Summary_and_Long_Form_20190809.pdf, is an introductory presentation document. The first document focuses on elements of the proposed Integrated Resource Plan's ("IRP") Action Plan. The document is intended to

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be presented by PREPA Executive Director and Chief Executive Officer Mr. Jose F. Ortiz Vazquez.

The Second Presentation Document

The second document, with the file name 02 PREPA 2018 IRP_Part_I_v1 jfb cmts 8-9-19.pdf, is the main presentation document. The second document is an overview, but at a fairly detailed level in many respects, of the methodology and subjects of the proposed IRP. This document is intended to serve as the primary presentation document that is required by the Energy Bureau's July 26th Resolution. The document is intended to be presented primarily by Siemens PTI PREPA IRP team leader Dr. Nelson Bacalao.

Please note that that second document, in order to be more informative, is very lengthy. The document might contain minor errors such as typographical errors. Siemens, if it identifies any such errors before August 13th, intends to prepare and provide a corrected version unless the corrections are negligible.

Please also note that Siemens also is reviewing whether there might be additional information that it might be useful to add in order to supplement the second document. Siemens, if it identifies any such supplementation before August 13th, intends to prepare and provide a supplemented version.

PREPA will promptly file and serve any such corrected and/or supplemented version of the second document.

The Third Presentation Document

The third document, in three versions with the file names 03 PREPA IRP 2019 - MiniGrid_and_Transmission_Draft.pdf, 04 Confidential - PREPA IRP 2019 -

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MiniGrid_and_Transmission_Draft.pdf, and 05 Confidential and CEII - PREPA IRP 2019 - MiniGrid_and_Transmission_Draft.pdf, respectively, is a major supplement to the main presentation document (the second document). The third document also is highly detailed and addresses PREPA's IRP's MiniGrids proposal, the transmission system and proposed transmission investments, and supply / demand balance and load and loss of load information. The document is intended to be presented primarily by Yan Du.

There are three versions because the document contains confidential (trade secrets) and CEII information. The public version has none of the confidential information. The confidential version has the confidential information but not the CEII information. The confidential and CEII version has both.

PREPA seeks approval of the confidentiality designations. The designations basically parallel designations that PREPA made and supported via motion with respect to Appendix 1 of the IRP main Report filed on June 7, 2019. The Energy Bureau approved those designations in its Resolution and Order of July 3, 2019.

PREPA at this time will serve only the public version of the third document on intervenors. PREPA is aware that at least one intervenor (OIPC) has filed a non-disclosure agreement document for the purposes of obtaining access to confidential information, but PREPA is not yet aware whether the Energy Bureau has approved that request, and whether the Energy Bureau intends that form of document to cover not only trade secrets but also CEII or intends to impose additional protections for CEII. In the 2015 IRP case, the Energy Bureau, after discussion, imposed additional restrictions to protect CEII.

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WHEREFORE, the Puerto Rico Electric Power Authority respectfully requests that the Puerto Rico Energy Bureau accept this Compliance filing and order such relief, if any, as is warranted.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 9th DAY OF AUGUST, 2019

PUERTO RICO ELECTRIC POWER AUTHORITY



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CERTIFICATION OF FILING AND SERVICE

I hereby certify that on August 9, 2019, I have filed the above Compliance filing (including its three attachments) with the Puerto Rico Energy Bureau's Clerk via email to secretaria@energia.pr.gov, and further that courtesy copies were sent via email to the Bureau's staff at wcordero@energia.pr.gov, legal@energia.pr.gov, sugarte@energia.pr.gov and viacaron@energia.pr.gov.

In addition, the foregoing filing (including its attachments) was, on August 9, 2019, sent via email to the approved or pending intervenors (Arctas, Caribe GE, League of Cooperatives and AMANESER 2025, OIPC, EcoElectrica, Empire Gas, Environmental Defense Fund, Local Environmental Organizations, National, "Non Profits", Progression, SESA-PR, Renew, Shell, Sunrun, Wartsila, Windmar Group) and amicus (ACONER, AES-PR, RMI) at the following email addresses: sierra@arctas.com, tonytorres2366@gmail.com, cfl@mcvpr.com, gnr@mcvpr.com, info@liga.coop, amaneser2020@gmail.com, hrivera@oipc.pr.gov, jrivera@cnslpr.com, carlos.reyes@ecoelectrica.com, ccf@tcmrslaw.com, manuelgabrielfernandez@gmail.com, acarbo@edf.org, pedrosaade5@gmail.com, rmurthy@earthjustice.org, corey.brady@weil.com, acasellas@amgprlaw.com, jperez@amgprlaw.com, agraitfe@agraitlawpr.com, maortiz@lvprlaw.com, rnegron@dnlawpr.com, cfl@mcvpr.com, castrodieppalaw@gmail.com, voxpathulix@gmail.com, paul.demoud@shell.com, javier.ruajovet@sunrun.com, escott@ferraiuoli.com, mgrpcorp@gmail.com, aconer.pr@gmail.com, axel.colon@aes.com, rtorbert@rmi.org.

PREPA does not yet know what email address to use for intervenor CIAPR.

Please advise PREPA of any needed corrections or changes to the above email address list.



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