

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

2019 AUG 22 AM 10: 49

IN RE:

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

CASE NO.:

CEPR-AP-2018-0001

SUBJECT:

Notice of Appearance on Behalf of the Puerto
Rico Electric Power Authority

REQUEST FOR EXTENSION OF TIME TO FILE
RESPONSES TO REQUEST FOR INFORMATION THE
BUREAU'S 4TH AND 5TH REQUIREMENT OF INFORMATION

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority through the undersigned legal representation and respectfully sets forth and pray:

1. On August 1st and 8th of 2019, the Puerto Rico Energy Bureau (the "Bureau") served the Puerto Rico Electric Power Authority (PREPA) with: Part A of the 4th Requirement of Information to PREPA; Part B of the 4th Requirement of Information to PREPA and 5th Requirement of Information to PREPA (the aforementioned requirements for information are hereinafter referred to as "Bureau's ROIs"),
2. Pursuant to the applicable deadlines as provided in Article VII of Regulation 8543, *Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Proceedings*, the deadline for PREPA to submit responses to Bureau's ROIs is August 23rd and 26th, respectively.
3. PREPA has been diligently working to respond to Bureau's ROIs. However, PREPA will not be prepared to submit the responses to Bureau's ROIs on or before the applicable deadlines.

4. As the Bureau is aware, on September 13, 2019, PREPA and its main Integrated Resources Plan's consultant, Siemens, appeared at a technical hearing before the Bureau.

5. In order to be able to provide an adequate presentation of PREPA's proposed Integrated Resource Plan, Siemens expended considerable time in preparation for the hearing. These preparations forced PREPA and Siemens to focus on the hearing, while simultaneously working with other requirements for information and the preparation of the AES study. PREPA and Siemens did continue working on the response to Bureau's ROIs but the main efforts were directed towards the hearing. For this reason, PREPA will not be able to respond to all of Bureau's ROIs on or before the applicable deadlines.

6. However, there are some responses and supporting documents that will be submitted within the applicable deadline.

7. For all the remaining responses and supporting documents, PREPA requests the Bureau to grant an extension to be able to fully comply with the submittal. PREPA plans on producing the responses and supporting documents on a rolling basis, and not waiting until the last day to present all the pending responses.

8. PREPA understands that an extension of time to respond to the Bureau's ROIs until August 30, 2019, will suffice for PREPA to complete the rolling production in response to the Bureau's ROIs.

9. The request for extension of time is made in good faith after diligent efforts to comply with the Bureau's orders and will not prejudice the rights of other parties.

WHEREFORE, PREPA requests the Bureau to grant an extension of time until August 30, 2019 to submit the responses, together with the supporting documents, to the Bureau's ROIs.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of August, 2019.

/s/ Katuska Bolaños

Katuska Bolaños
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CERTIFICATE OF SERVICE

We hereby certify that, on this same date we have filed the above motion at the office of the Clerk of the Puerto Rico Energy Bureau; and a courtesy copy of the filing was sent via e-mail to the Puerto Rico Energy Bureau Clerk and internal legal counsel to: secretaria@energia.pr.gov; wccordero@energia.pr.gov; legal@energia.pr.gov; and sugarte@energia.pr.gov.

In addition, the foregoing filing was sent via e-mail to the approved or pending intervenors (Arctas, Caribe GE, League of Cooperatives and AMANESER 2025, OIPC, EcoEléctrica, 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 e-mail addresses:

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<gmaldonado@energia.pr.gov>; <viacaron@energia.pr.gov>.

In San Juan, Puerto Rico, this 22nd day of August, 2019.

/s Katuska Bolaños
Katuska Bolaños