

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

**NEPR**

**Received:**

**Sep 27, 2019**

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**IN RE:**

**REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY  
INTEGRATED RESOURCE PLAN**

**CASE NO.:**

**CEPR-AP-2018-0001**

**SUBJECT:**

**Request for Extension of Time to Respond  
to LEO and Watsila's RoIs.**

**MOTION FOR EXTENSION OF TIME TO RESPOND TO  
LEO AND WATSILA'S ROIS**

TO THE HONORABLE 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 September 19, 2019, the Puerto Rico Electric Power Authority (PREPA) filed a document titled *The Puerto Rico Electric Power Authority Urgent Omnibus Motion for Reconsideration and/or Request for Extension of Time to Comply with Orders* (the "Omnibus Motion"). Through the Omnibus Motion, PREPA requested the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") to grant an extension of time to respond to several requirements of information that the Energy Bureau and several intervenors had served on PREPA.

2. On September 23, 2019, the Energy Bureau entered a Resolution and Order granting PREPA different extensions of times to respond to the pending requirements for information (the "Order"). The deadlines established in the Order are divided in several groups. Pursuant to the Order, the last due date for PREPA to submit responses to the requirements for information for which an extension was sought is October 16, 2019.

3. One day *after* the Omnibus Motion was filed, on September 20, 2019, the Local Environmental Organizations (“LEO”) served PREPA with its third requirement for information. The day *after* the Energy Bureau entered the Order, on September 24, 2019, Watsila North America (“Watsila”) served PREPA with its second requirement for information (both requirements for information hereinafter referred to as “Leo and Watsila RoIs”).

4. Pursuant to the Resolution and Order dated July 3, 2019, as amended, PREPA has ten (10) days to respond to requirements for information submitted either by the Energy Bureau or by the intervenors. Therefore, the deadline to respond to LEO and Watsila’s RoIs is September 30 and October 4, 2019, respectively.

5. As the Energy Bureau already knows, and recognized in its Order, the IRP review is complex and the requirements for information submitted by the intervenors are comprehensive. *See* Order, pág. 5, ¶ B. LEO and Watsila’s RoIs are no different to other comprehensive requirements that have been served on PREPA and gathering and producing the information necessary to adequately respond is going to take more time than the allowed by the procedural calendar.

6. Combined, LEO and Watsila’s RoIs have ninety-six (96) interrogatories or requirements for production of documents. The afore-mentioned number doesn’t consider the subparts included in Watsila’s requirement.

7. PREPA is diligently working to meet the deadlines included in the Order. The Order’s deadlines are pressing and do not give PREPA wiggle room to make time to answer more requirement for information. PREPA is not able to meet the mandated ten (10) day deadline to respond to LEO and Watsila’s RoIs.

8. Taking in consideration that the last deadline included in the Order is October 16<sup>th</sup>, 2019, PREPA requests the Energy Bureau to grant until October 28<sup>th</sup>, 2019, to respond to LEO and Watsila's RoIs.

**WHEREFORE**, the Puerto Rico Electric Power Authority requests that the Honorable Puerto Rico Energy Bureau grant this motion and provide until October 28<sup>th</sup>, 2019 to respond to LEO and Watsila's RoIs.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 27<sup>th</sup> day of September 2019.

*/s/ Katuska Bolaños*  
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## CERTIFICATE OF SERVICE

It is hereby certified that, on this same date I have filed the above motion using the Energy Bureau's Electronic Filing System, at the following address: <http://radicacion.energia.pr.gov> and that a courtesy copy of the filing was sent via e-mail to: sierra@arctas.com; tonytorres2366@gmail.com; cfl@mcvpr.com; gnr@mcvpr.com; info@liga.coop; amaneser2020@gmail.com; hriviera@oipc.pr.gov; jriviera@cnslpr.com; carlos.reyes@ecoelectrica.com; ccf@tcmrslaw.com; manuelgabrielfernandez@gmail.com; acarbo@edf.org; pedrosaade5@gmail.com; rmurthy@earthjustice.org; rstgo2@gmail.com; larroyo@earthjustice.org; jluebkekmann@earthjustice.org; acasellas@amgprlaw.com; loliver@amgprlaw.com; epo@amgprlaw.com; robert.berezin@weil.com; marcia.goldstein@weil.com; jonathan.polkes@weil.com; gregory.silbert@weil.com; agraitfe@agraitlawpr.com; maortiz@lvprlaw.com; rnegron@dnlawpr.com; castrodiappalaw@gmail.com; voxpopulix@gmail.com; paul.demoudt@shell.com; javier.ruajovet@sunrun.com; escott@ferraiuoli.com; SProctor@huntonak.com; GiaCribbs@huntonak.com; mgrpcorp@gmail.com; aconer.pr@gmail.com; axel.colon@aes.com; rtorbert@rmi.org; apagan@mpmlawpr.com; [mpietrantoni@mpmlawpr.com](mailto:mpietrantoni@mpmlawpr.com).

In San Juan, Puerto Rico, this 27<sup>th</sup> day of September 2019.

*s/ Katuska Bolaños*  
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