

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

<del>NEPR</del>  <b>Received:</b>  Sep 26, 2019  1:09 PM
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**IN RE:**

**PUERTO RICO ELECTRIC POWER  
AUTHORITY RATE REVIEW**

CASE NO.:

CEPR-AP-2015-0001; NEPR-AP-2018-0003

SUBJECT:

Resolution and Order dated  
September 25, 2019

**MOTION TO SUBMIT ADDITIONAL INFORMATION FOR THE DETERMINATION  
OF FACTORS FOR THE PERIOD OF OCTOBER TO DECEMBER 2019  
IN COMPLIANCE WITH ORDER DATED SEPTEMBER 25, 2019**

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 September 13<sup>th</sup> and 20<sup>th</sup>, 2019, the Puerto Rico Electric Power Authority (PREPA) filed a *Motion to Submit Proposed Factors for the Period of October to December 2019 and the Public Lighting Report* and a *Motion to Submit Additional Reconciliations (August 2019) for the Determination of Factors for the Period of October to December 2019* (the “Submittal of Reconciliations”), respectively. The Submittal of Reconciliations were accompanied by several exhibits in Excel format to support the review of the factors associated with the fuel adjustment, purchased power, fuel oil subsidy, and also, a public lighting report. *See* Submittal of Reconciliations.

2. On September 25, 2019, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) entered a *Resolution and Order* (the “Order”) notifying PREPA, among other things, that some of the cells of the Excel files were blacked out and unredacted versions of such files were required. Also, the Energy Bureau set forth that PREPA had not

complied with the requirement of submitting supporting data or documents and reference sources for some of the information included in the exhibits and, that some files did not include the information of certain months. The Energy Bureau ordered PREPA to file certain specific files and information to cover the above-mentioned deficiencies in the Submittal of Reconciliations and its exhibits on or before today at 2:00 pm.

3. Pursuant to the Order, PREPA herein submits additional information for the following:

**1) Summary of Adjustment Clauses May-June-July- August 2019. xlsx**

PREPA submits supporting information on a USB drive in a folder named *Summary of Adjustment Clauses - supporting documents - Confidential Version* with the following files:

- 1(a) - Unredacted Reconciliation Files
- 1(b) - Support for fuel data provided - May through Aug 2019
- 1(c)(d)(f) - Basis for computation of Prior Period Adjustments Jul-Aug 2019
- 1(e) - Purchased Power Invoices
- 1(g) - Data Points Explanation

**2) Public Lighting Adjustment.xlsx**

PREPA submits supporting information on a USB drive in a folder named *Public Lighting Adjustment-Confidential Version* with the following files:

- ESTIMADO LUMINARIAS AFECTADAS POR MUNICIPIO 5 DE AGOSTO DE 2019 - OPERACIONES TÉCNICAS – TD
- ESTIMADO LUMINARIAS AFECTADAS POR MUNICIPIO 9 DE JULIO 2019 - OPERACIONES TÉCNICAS – TD

- ESTIMADO LUMINARIAS AFECTADAS POR MUNICIPIO 19 DE AGOSTO DE 2019 - OPERACIONES TÉCNICAS – TD
- Public Lighting adjustment including August 2019

Regarding the Cells D4 to D5 and D11 to D12, PREPA clarifies that the 01-036 and 050-056 nomenclature refers to the Rate Codes for General Public Lighting.

**3) Ingresos Mensuales 2020 (21062019).xlsx**

This file was previously submitted to the PREB for the determination of July to September factors that were evaluated and approved.<sup>1</sup>

4. The above-listed files are supplemental to the Submittal of Reconciliations.

**WHEREFORE**, PREPA respectfully requests the Energy Bureau to note PREPA's compliance with the Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 26<sup>th</sup> day of September 2019.

*/s Katuska Bolaños*  
 Katuska Bolaños  
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<sup>1</sup> The attached Excel files contain over one-hundred (100) worksheets. PREPA will present a memorandum for confidential treatment of said worksheets' formulas and related information, with attached redacted versions (only values), on or before October 2, 2019.

**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 [hrivera@oipc.pr.gov](mailto:hrivera@oipc.pr.gov); [abogados@fuerteslaw.com](mailto:abogados@fuerteslaw.com); [francisco.rullan@aae.pr.gov](mailto:francisco.rullan@aae.pr.gov); [mgrpcorp@gmail.com](mailto:mgrpcorp@gmail.com); [licenciadamasferrer@gmail.com](mailto:licenciadamasferrer@gmail.com); [wilma.lopez@aae.pr.gov](mailto:wilma.lopez@aae.pr.gov) [cfl@mcvpr.com](mailto:cfl@mcvpr.com); [ive@mcvpr.com](mailto:ive@mcvpr.com); [pnieves@vnblegal.com](mailto:pnieves@vnblegal.com); [mmuntanerlaw@gmail.com](mailto:mmuntanerlaw@gmail.com); [maribel.cruz@acueductospr.com](mailto:maribel.cruz@acueductospr.com); [jfeliciano@constructorespr.net](mailto:jfeliciano@constructorespr.net); [abogados@fuerteslaw.com](mailto:abogados@fuerteslaw.com); [eirizarry@ccdlawpr.com](mailto:eirizarry@ccdlawpr.com); [edwin.quinones@aae.pr.gov](mailto:edwin.quinones@aae.pr.gov); [nydinmarie.watlington@cemex.com](mailto:nydinmarie.watlington@cemex.com); [aconer.pr@gmail.com](mailto:aconer.pr@gmail.com); [epenergypr@gmail.com](mailto:epenergypr@gmail.com); [jorgehernandez@escopr.net](mailto:jorgehernandez@escopr.net); [ecandelaria@camarapr.net](mailto:ecandelaria@camarapr.net); [pga@caribe.net](mailto:pga@caribe.net); [manuelgabrielfernandez@gmail.com](mailto:manuelgabrielfernandez@gmail.com); [mreyes@midapr.com](mailto:mreyes@midapr.com); [agraitfe@agraitlawpr.com](mailto:agraitfe@agraitlawpr.com); [attystgo@yahoo.com](mailto:attystgo@yahoo.com).

In San Juan, Puerto Rico, this 26<sup>th</sup> day of September 2019.

*/s/ Katuska Bolaños*  
Katuska Bolaños

**Exhibit A**

[ATTACHMENTS PRODUCED TODAY IN NATIVE FORMAT TO ALL PARTIES

VIA EMAIL AND TO THE ENERGY BUREAU IN A FLASH DRIVE]