

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

NEPR Received: Sep 6, 2019 5:16 PM

IN RE:

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

CASE NO.:

CEPR-AP-2018-0001

SUBJECT:

PREPA's Response to the Energy Bureau's
August 27, 2019 Order

**MOTION IN COMPLIANCE WITH ORDER DATED AUGUST 27, 2019 AND IN
FURTHER SUPPORT TO REQUEST FOR CONFIDENTIALITY DESIGNATIONS**

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:

I. Introduction

On June 3, 2019, the Puerto Rico Energy Bureau (the "Energy Bureau") granted certain Puerto Rico Electric Power Authority (PREPA)'s request for confidential designation of items specified in the June 21 Motion¹. On August 27, 2019, the Energy Bureau issued a Resolution and Order (the "August 27 Order") amending the confidentiality treatment and designations for the items specified in the June 21 Motion. In summary, in the August 27 Order the Energy Bureau determined to amend the confidentiality designation and treatment for the items specified in the June 21 Motion and, in summary, ordered that certain documents were going to be designated as confidential², certain documents were not going to be designated as confidential information³, directed PREPA to provide further explanation or justify why the information included in Table 3

¹ Terms not defined herein shall be interpreted pursuant to the definition provided in the Energy Bureau's Resolution and Order dated August 27, 2019.

² Table 1 of the August 27 Order.

³ Table 2 of the August 27 Order.

of the August 27 Order should not be public and also, directed PREPA to provide a summary of certain resource side workpapers⁴. In addition, the Resolution and Order also ordered PREPA to provide the files that appear to be Aurora modeling files, in a format readable to the THE ENERGY BUREAU.

PREPA's responses to each of the August 27 Order's requirements follow.

II. Documents that shall not be designated as confidential information by the Energy Bureau

Table 2 of the August 27 Order lists several documents that PREPA requested the Energy Bureau to designate as confidential. The Energy Bureau denied said request. In its August 27 Order, the Energy Bureau states that

[i]n accordance with the provisions of the August 31, 2016 Resolution in Case Number CEPR-MI-2016-0009, the Energy Bureau will disclose the information contained in Table 2 within thirty (30) days from the notification date of this Resolution and Order, unless PREPA requests reconsideration, judicial review, or any other remedy it deems appropriate, which will interrupt the referenced thirty –day term.

The Energy Bureau gave PREPA twenty (20) days from the date of filing of the August 27 Order to move for reconsideration.

PREPA, after additional review of the documents listed in Table 2 of the August 27 Order, requests that the Energy Bureau to reconsider its decision to not designate the file *Existing Units Parameters_12292018_V6.1.xlsx* as confidential. The *Existing Units Parameters_12292018_V6.1.xlsx* contains sensitive information on PREPA's generation units and on AES and EcoEléctrica generating units that can be justified as Trade Secret Information.

⁴ Table 4 of the August 27 Order.

III. Documents for which further justification is required by the Energy Bureau

Table 3 of the August 27 Order identifies the documents for which the Energy Bureau has requested further justification to be designated as confidential. The justification as to why the identified documents should be considered confidential follow

- a. File Distribution_Sub_Feeder_v1.1.xlsx – This file contains Critical Energy Infrastructure Information (CEII), including information on transmission infrastructure prioritization. It also includes prioritization of PREPA’s distribution substations and distribution feeders according to critical load served and the amount of priority and critical load served and also, identifies priority and critical loads. The aforementioned file also identifies the location of the priority infrastructure and critical loads, and could be used to compromise the integrity of Puerto Rico’s electric system and disrupt critical or priority loads. Therefore, PREPA requests the Energy Bureau to designate the Distribution_Sub_Feeder_v1.1.xlsx as confidential.

- b. File Mini Grids CapEx Summary 1.22.2029.xlsx – This file contains CEII, including information on transmission infrastructure prioritization. It also includes prioritization of PREPA’s distribution substations and distribution feeders according to critical load served and the amount of priority and critical load served and identifies priority and critical loads. The file identifies the location of such priority infrastructure and critical loads and could be used to compromise the integrity of Puerto Rico’s electric system and disrupt critical or priority loads. Therefore, PREPA requests the Energy Bureau to designate the Mini Grids CapEx Summary 1.22.2029.xlsx as confidential.

- c. File IRP_19_Substation_LoadProcessing_Final.xlsx – This file contains Critical Energy Infrastructure Information including information on critical loads, including a list of private substations identified as critical loads. It also includes prioritization of PREPA’s distribution substations and distribution feeders according to critical load served and the amount of priority and critical load served and identifies priority and critical loads. The file identifies the location of such priority infrastructure and critical loads and could be used to compromise the integrity of Puerto Rico’s electric system and disrupt critical or priority loads. Therefore, PREPA requests the Energy Bureau to designate the Mini Grids CapEx Summary 1.22.2029.xlsx as confidential.
- d. File Minigrid VOLL_final.xlsx – This file contains Critical Energy Infrastructure Information including information on PREPA transmission system busses with priority and critical loads. The could be used to compromise the integrity of Puerto Rico’s electric system and disrupt critical or priority loads. Therefore, PREPA requests the Energy Bureau to designate the Mini Grids Minigrid VOLL_final.xlsx as confidential.
- e. File MiniGrids CapEx Summary_wPriority_Final.xlsx – This file contains Critical Energy Infrastructure Information, including information on transmission infrastructure prioritization, identifying priority and critical loads served by transmission infrastructure. The file could be used to compromise the integrity of Puerto Rico’s electric system and disrupt critical or priority loads. Therefore, PREPA requests the Energy Bureau to designate the MiniGrids CapEx Summary_wPriority_Final.xlsx as confidential.
- f. File Contingency_Analysis_Output_Final.xlsx – This File presents the results of running contingency analysis on PREPA’s transmission infrastructure, including the impacts of

such contingencies. The file could be used to compromise the integrity of Puerto Rico's electric system. Therefore, PREPA requests the Energy Bureau to designate the Contingency_Analysis_Output_Final.xlsx as confidential.

- g. Maps Folder in Appendix 1 Folder – This folder contains 5 files. Two of these files contain maps that show the location of PREPA's transmission and distribution infrastructure, particularly transmission line routes and distribution substation locations (files ITEM 46_Mapas Maestro PRGrid64.pdf and ITEM 46_Mapas PR_40_Grid_2). One file (ITEM 46_202904 Diagrama Monolineal) presents a single line diagram of PREPA's transmission system, identifying transmission and subtransmission lines, distribution substation, main protection equipment (fuses, breakers), generating units, among others. The two final files (ITEM 46_PREPA 115 kV TRANSMISSION LINES CAPACITY and ITEM 46_PREPA 115 kV TRANSMISSION LINES CAPACITY) list the capacity of transmission line segments. These files could be used to compromise the integrity of Puerto Rico's electric system. As such, PREPA maintains its position that the files should remain confidential. Therefore, PREPA requests the Energy Bureau to designate the ITEM 46_Mapas Maestro PRGrid64.pdf and ITEM 46_Mapas PR_40_Grid_2 as confidential.

After review and discussion with Siemens, PREPA understands that the following documents listed in Table 3 can be designated as not confidential:

- a. PREPA Fossil New Resources 10-9 208_v6.2.xlsx
- b. PREPA IRP Solar Wind Storage Costs-Updated CF-Wind-final.xlsm
- c. PREPA Fuel Forecast 06032019_FINAL_with_formulas.xlsx
- d. PREPA Fuel Price Designation (Conversion Cost details) v2.xlsx

e. PREPA Fuel Forecast 10232018_Client.xlsx

IV. Confidential documents for which a summary version is required

Table 4 of the August 27 Order identifies the documents for which the Energy Bureau has requested a summary version that may be designated as nonconfidential. PREPA will not pursue the request for confidentiality designation for the items listed in Table 4.

V. Aurora Modeling Files

The August 27 Order direct PREPA to submit what appear to be Aurora modeling files in a format readable to the Energy Bureau within ten (10) days from the notification date of the Resolution and Order.

PREPA discussed the Energy Bureau's request with Siemens, its main IRP consultant. PREPA suggests that the Energy Bureau can obtain the license for Aurora with the developer of the model, Energy Exemplar <https://energyexemplar.com/>. It is also recommended to have a user with some level of expertise in Aurora or another production cost model.

PREPA's consultant, Siemens, could provide the Energy Bureau copy of the input tables in MS-excel. However, it will be of limited use to a non-model expert or even an expert user given the construct of the model. The limited use stems from two reasons. The first reason is that all input tables in the model are interconnected, many inputs are not explicit in a single table but link to other tables. PREPA deems that it will be difficult to tell what external table is referenced without knowing the model. Second, many functionalities in Aurora are not included in the input tables but in the project set up tab, simulation options tab and/or change sets. A snapshot of those settings could be provided but will not be of much use without the model and knowing its purpose.

A copy of the Aurora model with all scenarios were provided to the Bureau in the first filing, in February of 2019. An updated copy could be provided with the latest inputs for the second filing from June 2019. The model will be submitted as confidential, considering that some of the data pertains to detailed operational specifications of the generating units and transmission interconnections. Siemen's experts could also, either on site or via web-based conference call, provide the Energy Bureau a walk through the model, the input assumptions or answer particular questions.

WHEREFORE, it is respectfully requested that the Energy Bureau notes PREPA's compliance with the August 27 Order and grants confidentiality designation to the files that PREPA has requested reconsideration of the August 27 Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of September 2019.

/s/ Katuska Bolaños
Katuska Bolaños
kbolanos@diazvaz.law
TSPR 18888

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.
644 Ave. Fernández Juncos
District View Plaza, Suite 301
San Juan, PR 00907-3122
Tel. (787) 679-7132
Fax. (787) 919-7319

CERTIFICATE OF SERVICE

It is hereby certified that, on this same date I have electronically filed this document with the Puerto Rico Energy Bureau via <https://radicacion.energia.pr.gov/>; and a courtesy copy of the filing was sent via e-mail to: secretaria@energia.pr.gov; wcordova@energia.pr.gov; legal@energia.pr.gov; sugarte@energia.pr.gov; 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, murthy@earthjustice.org, rstgo2@gmail.com, larroyo@earthjustice.org, jluebkemann@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.

In San Juan, Puerto Rico, this 6th day of September 2019.

/s Katuska Bolaños
Katuska Bolaños