

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

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Received:
Sep 13, 2019
11:07 PM

IN RE:

**PUERTO RICO ELECTRIC POWER
AUTHORITY RATE REVIEW**

CASE NO.:

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

SUBJECT:

PREPA's Request for Extension of Time to
Submit Reconciliations

**REQUEST FOR CONFIDENTIAL DESIGNATION OF ATTACHMENTS
TO THE MOTION TO SUBMIT PROPOSED FACTORS FOR THE PERIOD OF
OCTOBER TO DECEMBER 2019 AND PUBLIC LIGHTING REPORT**

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. Today, the Puerto Rico Electric Power Authority (PREPA) has filed a *Motion to Submit Proposed Factors for the Period of October to December 2019 and Public Lighting Report* (the "Submittal"). The Submittal includes as attachments several excel spreadsheets with (1) formulas, calculations and procedures that are proprietary information of PREPA, (2) should not be made public as filed, and (iii) are protected under Puerto Rico law.

2. The files were made public without the formulas, calculations and procedures and now PREPA moves the Puerto Rico Energy Bureau (the "Energy Bureau") to grant confidential treatment to the excel spreadsheets in their native form with the original formulas, calculations and procedures. The files for which PREPA moves the Energy Bureau to designate as confidential are:

- a. Ingresos mensuales 2020 (21062019)
- b. OCT-DEC 2019 FACTORS
- c. Public Lighting adjustment

d. Summary of Adjustment Clauses May-June-July 2019 REV

3. The same remedy that PREPA requests in this motion was granted on July 12, 2019, when PREPA requested the Energy Bureau to grant confidential designations on several files that contain the same formulas and calculations that PREPA once again moves the Energy Bureau to keep confidential.

WHEREFORE, PREPA respectfully requests the Energy Bureau to grant confidential designations to the files listed in paragraph 2 of this motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of September 2019.

/s/ 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; wcordero@energia.pr.gov; legal@energia.pr.gov; and sugarte@energia.pr.gov.

In addition, the foregoing filing was sent via e-mail to: jorge.ruiz@prepa.com; nitza.vazquez@prepa.com; n-ayala@prepa.com; c-aquino@prepa.com; j-morales@prepa.com; hrivera@oipc.pr.gov; abogados@fuerteslaw.com; francisco.rullan@aae.pr.gov; mgrpcorp@gmail.com; licenciadamasferrer@gmail.com; wilma.lopez@aae.pr.gov; cfl@mcvpr.com; ivc@mcvpr.com; pnieves@vnblegal.com; mmuntanerlaw@gmail.com; maribel.cruz@acueductospr.com; jfeliciano@constructorespr.net; abogados@fuerteslaw.com; eirizarry@ccdlawpr.com; edwin.quinones@aae.pr.gov; nydinmarie.watlington@cemex.com; aconer.pr@gmail.com; epenergypr@gmail.com; jorgehernandez@escopr.net; ecandelaria@camarapr.net; pga@caribe.net; manuelgabrielfernandez@gmail.com; mreyes@midapr.com; agraitfe@agraitlawpr.com; attystgo@yahoo.com;

In San Juan, Puerto Rico, this 13th day of September 2019.

/s/ Katuska Bolaños
Katuska Bolaños