

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

NEPR

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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
Wärtsilä and AES-PR requirements for
information

**CONSENTED TO MOTION FOR EXTENSION OF TIME TO RESPOND TO
SEVERAL REQUIREMENTS OF INFORMATION**

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 time to respond to several outstanding 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. The day *after* the Energy Bureau entered the Order, on September 24, 2019, Wärtsilä North America (“Wärtsilä”) served PREPA with the 2nd *Requirement of Information to PREPA*. Afterwards, on October 2, 2019, AES-Puerto Rico (“AES-PR”) served PREPA with its first *Requirement of Information*.

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, PREPA would have had until October 4th and 14th, respectively, to respond to Wärtsilä and AES-PR requirements for information.

5. As PREPA has reiterated several times and the Energy Bureau acknowledges in its Order, the Integrated Resource Plan review is complex and the requirements for information submitted by the intervenors are comprehensive. *See* Order, pág. 5, ¶ B.

6. PREPA has meet and confer with Wärtsilä and AES-PR and both intervenors expressed that they do not oppose to the Energy Bureau allowing PREPA to submit the responses to their requirements for information on or before October 16, 2019.

7. Good cause exists for the requested extension because PREPA, has been diligently working to meet the Order’s deadlines and also to meet the deadlines for all the other discovery requests that were served after PREPA requested the remedies provided in the Order. Moreover, pursuant to the Order, the discovery cut-off date is October 16, 2019 and thus, the extension of time herein sought will not cause any delay to the discovery proceedings in the case of caption.

WHEREFORE, PREPA requests that the Energy Bureau grant this motion and provide until October 16th, 2019 to respond to Wärtsilä and AES-PR requirements for information.

RESPECTFULLY SUBMITTED.

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

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

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.
290 Jesús T. Piñero Ave.
Scotiabank Tower, Suite 11-E
San Juan, PR 00918
PO Box 11689
San Juan, PR 00922-1689
Cel. (787) 458-8276

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; jluebkmann@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.

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

s/ Katuska Bolaños
Katuska Bolaños