

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

<b>NEPR</b>  <b>Received:</b>  Oct 25, 2019  6:39 PM
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**IN RE:**

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

CASE NO.:  
CEPR-AP-2018-0001

SUBJECT:  
Informative Motion Regarding AES-PR ROI

**INFORMATIVE MOTION AND REQUEST TO STRIKE AES ROI**

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 October 15, 2019, the Puerto Rico Electric Power Authority (PREPA) filed a document titled *Urgent Motion to Amend Procedural Calendar* (the “Urgent Motion”). Through the Urgent 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 and, to amend the case of caption’s procedural calendar.

2. One of the requests for extension of time included was an extension to respond to the AES-Puerto Rico (AES-PR) first requirement for information (the “AES ROI”) which was received on October 2, 2019. AEs ROI was due on October 16, 2019. Said requirement contained four (4) technical questions that called for PREPA to perform new models.

3. In the Urgent Motion, PREPA requested the Energy Bureau to grant until October 31, 2019, to respond to the AES ROI. As explained in Urgent Motion, PREPA must run additional simulations to answer AES ROI.

4. On October 16, 2019, the Energy Bureau entered a *Resolution and Order* granting PREPA, among other requests, until October 31, 2019, to respond to AES ROI, conditioned to PREPA being able to produce the technical responses by such deadline (the “October 16 Order”). Taking in consideration that it was likely that PREPA was not going to be able to meet the October 31, 2019, deadline, and also, taking into consideration AES-PR’s late intervention in the case of caption, the Energy Bureau reminded AES-PR that it had been “forewarned that the procedural calendar [was] not to be altered or modified due to said late intervention.” *See* October 16 Order, ¶ II, p. 3. As such, the Energy Bureau warned AES-PR that it would not extend the October 31, 2019, deadline for submissions of the answers for the AES ROI. *Id.* [Emphasis provided]. PREPA was directed to “inform the Energy Bureau if it [was] unable to submit its answers to AES-PR’s ROI by the October 31, 2019 deadline”. *Id.*

5. PREPA herein confirms that, due to the complexity of the AES ROI, combined with PREPA’s current schedule to respond to other intervenor’s ROIs and also, the efforts toward complying with the current procedural calendar, it will not be able to produce the response to the AES ROI.

6. The Energy Bureau must also note that, AES ROI requests a total of 3 cases with 86 simulations in total. For each of the three cases and 86 sensitivities, Aurora runs using Long-Term Capacity Expansion (LTC) simulations are needed. Doing LTCE simulations require a significant amount of time, including simulation time (10-16 hours), review time and reruns to fine tune results to have sensible numbers.

7. Therefore, for all of the reasons explained above, PREPA moves to strike the AES ROI.

**WHEREFORE**, PREPA requests that the Energy Bureau note that it will not be able to submit the responses to AES ROI and moves the Energy Bureau to strike the AES ROI.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 25<sup>th</sup> day of October 2019.

*/s Katuska Bolaños*  
Katuska Bolaños  
[kbolanos@diazvaz.law](mailto: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  
Tel. (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; castrodieppalaw@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 25<sup>th</sup> day of October 2019.

*s/ Katuska Bolaños*  
Katuska Bolaños