

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

NEPR

Received:

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IN RE:

INTEGRATED RESOURCE PLAN FOR THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO.: CEPR-AP-2018-0001

SUBJECT: PETITION OF PROGRESSION
ENERGY TO INTERVENE

**PROGRESSION ENERGY'S MOTION TO COMPEL FULL AND COMPLETE
ANSWERS TO INTERROGATORY**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW Progression Energy ("PE"), through the undersigned counsels, and respectfully moves to compel the Puerto Rico Electric Power Authority ("PREPA") to adequately answer seventeen of the twenty one interrogatories they have refused to answer.

1. On September 9, 2019, PE served PREPA with its "First Set of Interrogatories and Request for Production of Documents and Information" which contained twenty one questions.

(Exhibit 1)

2. All PE's interrogatories referred to the analysis and data used by PREPA to exclude offshore wind technology from the Integrated Resource Plan ("IRP"). This determination was based on a single 2015 study¹, which preliminarily assessed the cost of Offshore Wind Energy in Puerto Rico.

3. On September 19, 2019, PREPA filed its answer. **(Exhibit 2)**

¹ Rodríguez, Carbajal and Romero, *Preliminary Cost Assessment for Offshore Wind Energy in Puerto Rico*, Univ. Turabo de Puerto Rico (2015), hereinafter referred as "2015 study".

4. However, PREPA failed to provide full and complete substantive responses to PE's interrogatories.

5. In particular, PREPA refused to answer seventeen of the twenty one interrogatories on the following grounds: "The information requested is not available at this moment. It will be provided as soon as it becomes available." (**Exhibit 2**)

6. PE exposes, with the highest respect and formality that it is inconceivable that, at this time, PREPA doesn't have available the information from which decided to exclude offshore wind technology from the IRP.

7. On the other hand, the answers to the seventeen remaining interrogatories should have been provided in time in order for PE to incorporate the information into their Written Testimony. Specially, since the deadline for Intervenors' Written Testimony is due on October 23, 2019.

8. The Puerto Rico Energy Bureau ("Energy Bureau") property provided the parties with specific time to compel discovery. However, that schedule does not, nor should it, allow time for PREPA to be dilatory in meeting its discovery obligations.

9. Moreover, as PE cannot have the discovery information in time to prepare its Written Testimony, respectfully request the Energy Bureau to consider extending the deadline to Intervenor's Written Testimony.

10. For the reasons set forth above, PE request the Energy Bureau grants its motion to compel and order PREPA to provide substantive answers to interrogatories.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 30 DAY OF SEPTEMBER 2019.

CERTIFICATION OF FILING AND SERVICE

I hereby CERTIFY that on **September 30 2019**, I have sent the above Motion to Compel Full and Complete answers to interrogatories to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov>; and to secretaria@energia.pr.gov and wcordero@energia.pr.gov; the Bureau's Office of Legal Affairs to legal@energia.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez n-vazquez@aeopr.com; Astrid I. Rodríguez Cruz astrid.rodriguez@prepa.com; and to Jorge R. Ruíz Pabón Jorge.ruiz@prepa.com. And to: acarbo@edf.org; javier.ruajovet@sunrun.com; pedrosaade5@gmail.com; rmurthy@earthjustice.org; carlos.reyes@ecoelectrica.com; ccf@tmrslaw.com; victorluisgonzalez@yahoo.com; mgrpcorp@gmail.com; hrivera@oipc.pr.gov; jrivera@cnslpr.com; manuelgabrielfernandez@gmail.com; acasellas@amgprlaw.com; corey.brady@weil.com; paul.demoudt@shell.com; agraitfe@agraitlawpr.com; castrodieppalaw@gmail.com; voxpathulix@gmail.com; cfl@mevpr.com; sierra@arctas.com; tonytorres2366@gmail.com; info@liga.coop; amaneser2020@gmail.com; escott@ferraiuoli.com; sproctor@huntonak.com

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

IN RE:

INTEGRATED RESOURCE PLAN FOR THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO.: CEPR-AP-2018-0001**SUBJECT:** DISCOVERY

**FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS AND INFORMATION**

TO: PUERTO RICO ELECTRIC POWER AUTHORITY

Through its Attorneys of record: Maralíz Vázquez mvazquez@diazvaz.law; Katiushka Bolaños kbolanos@diazvaz.law; Astrid Rodríguez Cruz astrid.rodriguez@prepa.com; Jorge Ruiz Pabón jorge.ruiz@prepa.com; Nitza Vázquez Rodríguez n-vazquez@aepr.com; and Carlos Aquino Ramos c-aquino@prepa.com

Pursuant to Article VIII of the *Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Proceedings*, Regulation No. 8543, issue on December 18, 2014, and the Puerto Rico Energy Bureau July 3, 2019, Resolution and Order setting forth discovery procedures in this case, Progression Energy (“PE”) hereby submits its First Set of Interrogatories and Request for Production of Documents and Information to the Puerto Rico Electric Power Authority (“PREPA”).

PREPA shall submit, on or before **September 19, 2019**, the answers, information, data or documents required herein in digital format. PREPA shall submit it in accordance with the following definitions and instructions:

INSTRUCTIONS AND DEFINITIONS

1. Responses to questions must be made in writing, separately. Questions should be answered by supplying any information which PREPA has knowledge of or information obtained by

their representatives, employees, contractors or agents, or as a result of any investigation conducted. Each response shall state the person responsible for that response.

2. Responses to discovery are not required to be physically signed and verified before notary public. Accordingly, responses shall be notified via email to PE in *searchable portable document format* (i.e., PDF). Any analysis prepared using an electronic program similar to *Microsoft Excel* must be provided in native format with formulas and references intact. Under no circumstances may a printed document, scanned and converted to an image PDF/JPEG format, be presented if there is already a version in Word, searchable PDF, or Excel. Any document submitted in violation of the foregoing shall be deemed not to have been submitted. The presentation of PDF images will only be allowed for those documents that do not exist in a digital version, or for which PREPA does not have a digital version.

3. Responses must clearly identify the person providing the answer and must include a certification regarding that all answers provided therein are true and no false or misleading information has been provided. Furthermore, all answers may only be notified by the responding party's authorized representative.

4. When production of a document is required, the response should identify the document produced, the format or formats in which the document was produced, and the method and date it was delivered to PE and all other necessary participants. When submitting a document in response to a question, the document shall be identified with the specific Requirement number and attachment sequence. For example: PREPA-01-01 Attachment 1.

5. The term "document" shall mean and include, without limiting the generality of its meaning, originals or copies of them (if originals are unavailable) of all writings (whether handwritten, types, printed, photocopied or otherwise reproduced in any matter), papers or graphic

matters including, but not limited to e-mails, letters, correspondence, memoranda, minutes, notes, films, transcripts, contracts, agreements, memoranda of telephone conversations or face-to face conversations, microfilm of telephone conversations or releases, newspapers, magazines, advertisements, periodicals, bulletins, circulars, pamphlets, sketches, drawings, statements, notices, reports, partnership agreements and amendments, articles of association, by-laws, rules, regulations, directives, teletype messages, minutes of meetings, inter-office and intra-office communications, balance sheets, invoices, income and loss statements, inventories, operating budgets, accounting work sheets, financial statements, stock transfer books, ledgers, journals, books of accounts, bills, vouchers, checks, bank checks, proposals, prospectuses, offers, orders, receipts, working papers, desk calendars, appointment books, diaries, time sheets, logs, telephone messages, notebooks, postcards, evaluations, recommendations, annual reports, confirmations, leases, analyses, feasibility or market studies, disbursement requests or orders, charts, graphs, indices, projections, forms, data sheets, data processing discs or readable computer-produced interpretations of such discs, booklets, articles, manuals, speeches, stenographic notes, maps, studies, tests, surveys, cables, tape and disc recordings, Photostats, photographs, blueprints, slides, audit reports, personal interviews, summaries or paraphrases of any of the foregoing, wherever located or material similar to the foregoing, however determined by the parties.

6. The term "information" includes data and documents.

7. The term "communication" shall mean any oral or written communication for which you have knowledge, information or belief.

8. The term "PREPA" shall mean the Puerto Rico Electric Power Authority, its agents, representatives, contractors and/or employees.

9. The term "Bureau" shall mean the Puerto Rico Energy Bureau.

10. The term “IRP” shall mean the Revised Integrated Resource Plan submitted by PREPA to the Bureau on June 7, 2019, as subsequently supplemented.

11. The term “person” or “persons” shall mean and include individuals, corporations, partnerships, associations, trusts, joint ventures and all other legal entities (including governmental bodies and agencies).

12. If PREPA cannot answer any interrogatory or request for production of documents and information in full, it should respond to the extent possible and explain why it is unable to respond further.

13. If information, data, or documents required for any Requirement do not exist, the person to whom this request for information is directed shall so specify in his or her reply to that request.

14. If PREPA refuses to respond to any interrogatory, in whole or in part, on the basis that such interrogatory is unduly burdensome or impractical to answer, state in the objection what makes such interrogatory unduly burdensome or impractical, what information may be reasonably disclosed and provide that information.

15. If any request calls for the production of documents as to which a claim of privilege is asserted:

- (a) identify the document and any attachment thereto pursuant to the instructions below;
- (b) provide sufficient information concerning the identity, nature of, and subject matter of the document so that the propriety of the claim of privilege may be presented for determination by the Bureau;
- (c) the portion of the document as to which the stated privilege is alleged to apply;

- (d) the factual basis for asserting the claim of privilege and the substantive ground on which the stated privilege is alleged to apply; and
- (e) the last known custodian of the document and the present location of the document.

16. PREPA shall have a continuing duty to update, correct or amend its answers and notify PE of any additional information obtained after a response to any Requirement provided herein is given.

**INTERROGATORIES AND REQUEST FOR PRODUCTION
OF DOCUMENTS AND INFORMATION**

- PREPA-01-01 Describe the analysis performed by either PREPA or its consultants regarding PREPA’S IRP, “Section 6.8 – Considerations for Offshore Wind”, to conclude that “Offshore Wind was considered but [its] not included since it is expected to have cost[s] higher than the equivalent Solar PV project.”
- PREPA-01-02 Explain and provide copies of all sources consulted to exclude offshore wind from the IRP.
- PREPA-01-03 Provide the cost data that was used to complete this analysis.
- PREPA-01-04 Explain the basis of characterizing the data as unreliable (“lack of reliable data”).
- PREPA-01-05 Describe how much analysis of the Rodríguez, Carbajal and Romero, *Preliminary Cost Assessment for Offshore Wind Energy in Puerto Rico*, Univ. Turabo de Puerto Rico (2015), hereinafter referred as “2015 study”, was made to arrive at the determination to exclude offshore wind power.
- PREPA-01-06 Admit that numerous solar projects have been executed by PREPA and many will not be constructed either due to economic reasons on the part of the developer or due to land constraints for siting of the solar plants.
- PREPA-01-07 How does PREPA plan to meet the renewable energy mandate if offshore wind is excluded from the IRP knowing that some of those solar plants for which PPAs have been executed might not be constructed?
- PREPA-01-08 Describe what would be the expensive and time-consuming analysis, mentioned on IRP Section 6.8, required to study offshore wind.

- PREPA-01-09 Admit that in the 2015 study of the benefits of offshore wind were acknowledged but due to cost concerns the benefits were dismissed.
- PREPA-01-10 Admit that the 2015 study estimated the cost of offshore wind energy to reach a cost of \$0.10/kWh by the year 2020.
- PREPA-01-11 Has that 2015 study been updated to include the levelized cost of energy (“LCOE”) of some of the more recent offshore wind projects in Europe which have a LCOE as low as \$0.0540/kWh?
- PREPA-01-12 What additional analysis is being done after 2015 study? If not, explain why. If so, provide a copy of such analysis or sources.
- PREPA-01-13 If PREPA is presented with data showing that offshore wind is at or below the levelized cost of solar projects or other renewable energy projects, would PREPA consider including it in the IRP?
- PREPA-01-14 Is PREPA aware that the cost curve of offshore wind is expected to continue its downward trajectory with technology advancements similar to the decline in the cost curves of onshore wind and solar. If not, explain whether this data affects the analysis in the IRP? If the analysis is not affected by this data, explain why not?
- PREPA-01-15 Describe what are the time requirements mentioned on the IRP Section 6.8 that would play the technology out of reach. Define what “out of reach” is.
- PREPA-01-16 In the IRP it is mentioned on numerous occasions how dates would be postponed. Define what the hardline time requirements of the IRP are.
- PREPA-01-17 Describe the conditions and study analysis where offshore wind was included in the results.
- PREPA-01-18 Provide copies of all sources used by PREPA for offshore wind energy evaluation.
- PREPA-01-19 On the September 4th, 2019 technical hearing, it was suggested to questions by SESA, that storage could be installed in the Palo Seco plant. However, charging the batteries with PV would be challenging at that location. Would an offshore wind plant be useful to charge the batteries in Palo Seco? If not, why not?

PREPA-01-20

Was offshore wind considered instead of thermal units in the north? If not, why not?

PREPA-01-21

On the third part of the initial technical hearing, Dr. Bacalao stated that the IRP does not prescribe either the number of units or a specific technology. He stated that the IRP prescribes the capacity level required with certain efficiency and flexibility. With this being the case, any technology provider (thermal, PV, wind, etc...) should be able to participate on future RFPs for generation in the North of Puerto Rico as the prescribed requirements of the area are met. Would PREPA agree with this statement? If not, why not?

CERTIFICATION OF FILING AND SERVICE

I hereby CERTIFY that on **September 9, 2019**, I have sent the above First Set of Interrogatories and Request for Production of Documents and Information to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov>; and to secretaria@energia.pr.gov and wcordero@energia.pr.gov; the Bureau's Office of Legal Affairs to legal@energia.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez n-vazquez@aepr.com; Astrid I. Rodríguez Cruz astrid.rodriguez@prepa.com; and to Jorge R. Ruíz Pabón Jorge.ruiz@prepa.com. And to: acarbo@edf.org; javier.ruajovet@sunrun.com; pedrosaade5@gmail.com; rmurthy@earthjustice.org; carlos.reyes@ecoelectrica.com; ccf@tmrslaw.com; victorluisgonzalez@yahoo.com; mgrpcorp@gmail.com; hrivera@oipc.pr.gov; jrivera@cnslpr.com; manuelgabrielfernandez@gmail.com; acasellas@amgprlaw.com; corey.brady@weil.com; paul.demoudt@shell.com; agraitfe@agraitlawpr.com; castrodiieppalaw@gmail.com; voxpathulix@gmail.com; cfl@mcvpr.com; sierra@arctas.com; tonytorres2366@gmail.com; info@liga.coop; amaneser2020@gmail.com; escott@ferraiuoli.com.

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

IN RE:

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

NO. CEPR-AP-2018-0001

SUBJECT:
INTERVENORS REQUIREMENTS
OF INFORMATION

**THE PUERTO RICO ELECTRIC POWER AUTHORITY RESPONSES TO
PROGRESSION ENERGY FIRST SET OF REQUIREMENTS OF INFORMATION**

TO ALL PARTIES:

COMES NOW the Puerto Rico Electric Power Authority (PREPA) and hereby submits its responses to Progression Energy (PE) *First Set of Requirements of Information* dated September 9, 2019 (the “Request”). The responses are submitted pursuant to the provisions of Article VIII of Regulation No. 8543, Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Proceedings.

In San Juan, Puerto Rico, this 19th day of September 2019.

/s/ Katuska Bolaños
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**COMMONWEALTH OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

IN RE:

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

NO. CEPR-AP-2018-0001

**SUBJECT:
INTERVENORS REQUIREMENTS
OF INFORMATION**

**THE PUERTO RICO ELECTRIC POWER AUTHORITY RESPONSES TO
PROGRESSION ENERGY FIRST SET OF REQUIREMENTS OF INFORMATION**

TO: PROGRESSION ENERGY

Through:
maortiz@lvprlaw.com
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FROM: PUERTO RICO ELECTRIC POWER AUTHORITY

Through its Counsel of record

PREPA objects to any Requirement of Information (“ROI”) that calls for information or documents that are not in the possession, custody, or control of PREPA.

For ease of reference, the questions and requirements as set forth in the Request are herein transcribed and shown in bold previous to each answer.

PREPA-01-01 **Describe the analysis performed by either PREPA or its consultants regarding PREPA’s IRP, “Section 6.8 – Considerations for Offshore Wind”, to conclude that “Offshore Wind was considered but [its] not included since it is expected to have cost[s] higher than the equivalent Solar PV project.”**

Response: PREPA-01-01 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-02 **Explain and provide copies of all sources consulted to exclude offshore wind from the IRP.**

Response: PREPA-01-02 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-03 **Provide the cost data that was used to complete this analysis.**

Response: PREPA-01-03 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-04 **Explain the basis of characterizing the data as unreliable (“lack of reliable data”).**

Response: PREPA-01-04 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-05 **Describe how much analysis of the Rodríguez, Carbajal and Romero, *Preliminary Cost Assessment for Offshore Wind Energy in Puerto Rico*, Univ. Turabo de Puerto Rico (2015), hereinafter referred as “2015 study”, was made to arrive at the determination to exclude offshore wind power.**

Response: PREPA-01-05 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-06 **Admit that numerous solar projects have been executed by PREPA and many will not be constructed either due to economic reasons on the part of the developer or due to constraints for siting of the solar plants.**

The following response was provided by Efran Paredes Maisonet, Director of Planning and Environmental Protection, PREPA. Efran Paredes Maisonet certifies that, to the best of his information and belief, all answers provided by him herein are true and no false or misleading information has been provided.

Response: PREPA-01-06 As of today, PREPA has 58 Power Purchase and Operating Agreements (PPOAs) in effect for the purchase of renewable energy, totaling 1480.6 MW. Of these, 11 have already been built, and 10 are operational (an 11th project, Punta Lima Wind Farm, entered service in late 2012 but was severely affected by Hurricane María in 2017 and is currently not operational). Although the development of some of these projects has been affected by the companies not being able to secure permits, the main reason that these PPOAs have not moved forward to the construction phase is due to the

current status of the Government of Puerto Rico and of PREPA in particular, which entered into Forbearance Agreements in 2014 and filed for Title III protection under PROMESA in 2017. PREPA is currently renegotiating with a group of the companies that have PPOAs and is confident that once these renegotiations take place, the projects will move forward.

PREPA-01-07 **How does PREPA plan to meet the renewable energy mandate if offshore wind is excluded from the IRP knowing that some of those solar plants for which PPAs have been executed might not be constructed?**

The following response was provided by Efran Paredes Maisonet, Director of Planning and Environmental Protection, PREPA. Efran Paredes Maisonet certifies that, to the best of his information and belief, all answers provided by him herein are true and no false or misleading information has been provided.

Response: PREPA-01-07 Even if some of the PPOAs currently in effect are not constructed, PREPA will still have options to secure additional renewable energy capacity in order to meet the RPS, which may include carrying out requests for proposals for new renewable energy projects.

The main challenges to meeting the RPS requirements were technical in nature. Recent technological developments, mainly in the field of energy storage, help address these challenges and will facilitate compliance with the RPS targets.

PREPA-01-08 **Describe what would be the expensive and time-consuming analysis, mentioned on IRP Section 6.8, required to study offshore wind.**

Response: PREPA-01-08 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-09 **Admit that in the 2015 study of the benefits of offshore wind were acknowledged but due to cost concerns the benefits were dismissed.**

Response: PREPA-01-09 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-10 **Admit that the 2015 study estimated the cost of offshore wind energy to reach a cost of \$0.10/kWh by the year 2020.**

Response: PREPA-01-10 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-11 **Has that 2015 study been updated to include the levelized cost of energy (“LCOE”) of some of the more recent offshore wind projects in Europe which have a LCOE as low as \$0.0540/kWh?**

Response: PREPA-01-11 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-12 **What analysis is being done after 2015 study? If not, explain why. If so, provide a copy of such analysis or sources.**

Response: PREPA-01-12 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-13 **If PREPA is presented with data showing that offshore wind is at or below the levelized cost of solar projects or other renewable energy projects, would PREPA consider including it in the IRP?**

The following response was provided by Efran Paredes Maisonet, Director of Planning and Environmental Protection, PREPA. Efran Paredes Maisonet certifies that, to the best of his information and belief, all answers provided by him herein are true and no false or misleading information has been provided.

Response: PREPA-01-13 As stated in section 6.8 of the IRP report: “If offshore wind were to become practical and cost-competitive with solar PV installations, then we would expect some of the solar PV installations to be replaced by offshore wind. As previously noted, the cost and availability of the solar PV versus wind must show that wind is a lower cost alternative to justify its inclusion over solar PV.”

PREPA-01-14 **Is PREPA aware that the cost curve of offshore wind is expected to continue its downwards trajectory with technology advancements similar to the decline in the cost curves of onshore wind and solar. If not, explain whether this data affects the analysis of the IRP? If the analysis is not affected by this data, explain why not?**

Response: PREPA-01-14 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-15 **Describe what are the time requirements mentioned on the IRP Section 6.8 that would play the technology out of reach. Define what “out of reach” is.**

Response: PREPA-01-15 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-16 **In the IRP it is mentioned on numerous occasions how dates would be postponed. Define what the hardline time requirements of the IRP are.**

Response: PREPA-01-16 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-17 **Describe the conditions and study analysis where offshore wind was included in the results.**

Response: PREPA-01-17 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-18 **Provide copies of all sources used by PREPA for offshore wind evaluation.**

Response: PREPA-01-18 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-19 **On the September 4th, 2019 technical hearing, it was suggested to questions by SESA, that storage could be installed in the Palo Seco Plant. However, charging the batteries with PV would be challenging at that location. Would an offshore wind plant be useful to charge the batteries in Palo Seco? If not, why not?**

Response: PREPA-01-19 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-20 **Was offshore wind considered instead of thermal units in the north? If not, why not?**

Response: PREPA-01-20 The information requested is not available at this moment. It will be provided as soon as it becomes available.

PREPA-01-21 **On the third part of the initial technical hearing, Dr. Bacalao stated that the IRP does not prescribe either the number of units or a specific technology. He stated that the IRP prescribes the capacity level required with certain efficiency and flexibility. With this being the case, any technology provider (thermal, PV, wind, etc...) should be able to participate on future RFPs for generation in the North of Puerto Rico as the prescribed requirements of the area are met. Would PREPA agree with this statement? If not, why not?**

The following response was provided by Efran Paredes Maisonet, Director of Planning and Environmental Protection, PREPA. Efran Paredes Maisonet certifies that, to the best of his information and belief, all answers provided by him herein are true and no false or misleading information has been provided.

Response: PREPA-01-16 PREPA understands that any technology should be able to participate in a future RFP as long as it meets prescribed technical and economic requirements and the applicable energy policies.