

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

IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY INTEGRATED RESOURCE PLAN	CASE NO. CEPR-AP-2018-0001 SUBJECT: Discovery Process
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2019 OCT -4 PM 1:38

SECRETARIA
NEGOCIADO DE ENERGIA
DE PUERTO RICO

MOCION INFORMATIVA

Al Negociado:

Comparecen CENTRO UNIDO DE DETALLISTAS (CUD); CAMARA DE MERCADEO, INDUSTRIA Y DISTRIBUCION DE ALIMENTOS (MIDA); PUERTO RICO MANUFACTURES ASSOCIATION (PRMA); UNIDOS POR UTUADO (UPU), Y EL INSTITUTO DE COMPETITIVIDAD Y SOSTENIBILIDAD ECONOMICA DE PUERTO RICO (ICSE-PR) por conducto del abogado que suscribe y muy respetuosamente expone, alega y solicita:

1. Que en día de hoy se radicó Moción Informativa y En Cumplimiento de Orden.
2. Que en la misma señala que no se había radicado un Segundo ROI de los "not for profit" y que se había hecho una aclaración a la representación legal de la AEE.
3. Se acompaña copia de la "aclaración" sometida a la AEE.

POR TODO LO CUAL, se solicita muy respetuosamente de este Negociado tome conocimiento de lo antes expresado.

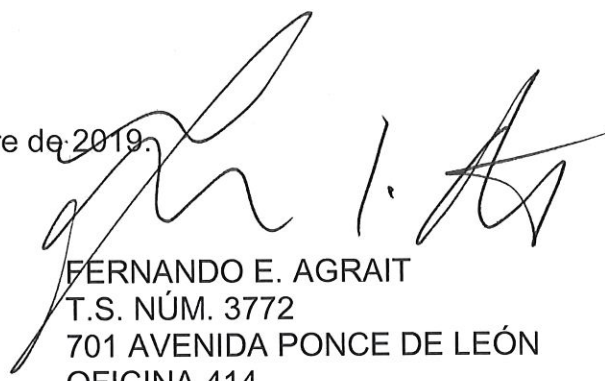
CERITIFICO: Haber enviado copia de este escrito a n-vazquez@aeep.com; Javier Rúa-Jovet <javier.ruajovet@sunrun.com>; pedrosaade5@gmail.com; Raghu Murthy <rmurthy@earthjustice.org>; rstgo2@gmail.com; carlos.reyes@ecoelectrica.com; ccf@tcmrslaw.com; victorluisgonzalez@yahoo.com; mgrpcorp@gmail.com; hriviera@oipc.pr.gov; jriviera@cnslpr.com; manuelgabrielfernandez@gmail.com; acasellas@amgprlaw.com; corey.brady@weil.com; maortiz@lvprlaw.com; rnegron@dnlawpr.com; paul.demoudt@shell.com; escott@ferraiuoli.com; castrodieppalaw@gmail.com; voxpopulix@gmail.com; cfl@mcvpr.com; info@liga.coop; amaneser2020@gmail.com;

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Puerto Rico Electric Power Authority
Nitza D. Vázquez Rodríguez
PO Box 363928
San Juan, Puerto Rico 00936-4267

RESPETUOSAMENTE SOMETIDO.

En San Juan, Puerto Rico, a 4 de octubre de 2019.

A handwritten signature in black ink, appearing to read 'F. Agrait', is written over the typed name and address.

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MEMO

TO : KATIUSKA BOLAÑOS-PREPA
FROM : FERNANDO E. AGRAIT
RE : NOT FOR PROFIT INTERVENORS 1ST REQUEST
INFORMATION
DATE : September 5, 2019

A. NPI-PREPA-01-05 What are the different rate impact of the different scenarios and strategies? Present a table summarizing this information.

PREPA comment: It was presented for the ESM and S4S2, it will require some work to do it for all. Please indicate what would be the priority S1S2, S3S2, S5S1?

Not For Profit Intervenor Comment

An Exhibit that summarizes **ALL rate impact components is not provided on the IRP documents**. Section 8.2.13 Rate Impact, Exhibit 8-37, Section 8.3-10 Rate Impact and Exhibit 8-59 provide some information in regards of Rate Impact, but **an Exhibit that includes all components for rate impact that projects the electricity rates after the implementation of the IRP** is not provided. Neither there is an Exhibit that provides Rates Impacts for all scenarios, as Exhibit 8-3 in Page 8-8 do for NPV and other important metrics. Therefore, PREPA should provide an Exhibit that summarizes rate impacts and provided projected rates after IRP implementation for ALL scenarios.

B. NPI-PREPA-01-06 What is the net present value of total operation costs of each scenario and strategy? Present this information in a table form, summing the information.

PREPA comment: Please provide clarification. Is it only operating and maintenance and fuel? No capital expenditures?

Not For Profit Intervenor Comment

Please confirm that the NPV in column 1 in Exhibit 8-3 in Page 8-8 (NPV @ 9% 2019-2038 k\$) includes operating, maintenance and fuel costs. If that information cannot

be confirmed, please provide an NPV that includes operating, maintenance and fuel costs.

In terms of Capital Costs - as addressed in Question 01-04 of the Energy Non Profits First ROI dated August 21, 2019 - the Capital Costs presented in Exhibit 8-3 (IRP Errata) are not in accordance with values in Exhibits 10-6, 10-7, 10-9, 10-11 and 10-19. Therefore, PREPA must provide an Exhibit that included **ALL capital cost for all scenarios. Capital costs shall include Generation Costs (including fuel based generation, renewables, battery storage, ancillary equipment and fuel infrastructure), Modifications to Transmission System including 230 KV, 115 KV and 38 KV lines; hardening for Transmission System; plus hardening and any modification for the Distribution System.**