

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

**NEPR**

**Received:**

**Nov 18, 2019**

**1:40 PM**

**IN RE:**

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

**CASE NO.:**

**CEPR-AP-2018-0001**

**SUBJECT:**

**Discovery Served on Intervenors**

**INFORMATIVE MOTION REGARDING DISCOVERY  
REQUESTS SERVED ON INTERVENORS**

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 November 13, 2019, the Puerto Rico Electric Power Authority (PREPA), in compliance with the procedural calendar of the case of caption, served discovery requests on the intervenors regarding the intervenors' written testimonies.

2. Specifically, PREPA served discoveries on the following intervenors:

- a. Environmental Defense Fund
- b. Local Environmental Organizations
- c. Empire Gas Company Inc.
- d. Progression Energy
- e. Wärtsilä North America Inc.
- f. Puerto Rico Solar Energy Industries Association Corp. *dba* Solar & Energy Storage Association of Puerto Rico
- g. Not-for-Profit Intervenors
- h. PV Properties, Inc. and Windmar Renewable Energy, Inc.

**WHEREFORE**, the Puerto Rico Electric Power Authority requests the Energy Bureau of the Puerto Rico Public Service Regulatory Board to note the above-mentioned.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 18<sup>th</sup> day of November 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) 395-7133

## 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; jluebkekmann@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 18<sup>th</sup> day of November 2019.

*s/ Katuska Bolaños*  
Katuska Bolaños