

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

NEPR

Received:

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IN RE:

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

CASE NO.:

CEPR-AP-2018-0001

SUBJECT:

Notice of Intent to File Opposition

**NOTICE OF INTENT TO FILE OPPOSITION TO THE LEOs MOTION AND
REQUEST FOR LEAVE TO FILE ON OR BEFORE DECEMBER 6, 2019**

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 20, 2019, Local Environmental Organizations (the “LEOs”) filed with the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) a *Petition Requesting Amendment to Non-Disclosure Agreement (NDA)* (the “Petition”).

2. Even though the Motion is only three (3) pages long, it presents several consequential factual and legal arguments that, if granted, could have implications on the draft IRP consideration, other matters pending before the Energy Bureau and PREPA’s confidential critical energy infrastructure information. Some of the LEOs arguments are based on the constitutions of the United States and Puerto Rico, while other challenge final and unappealable rules and orders of the Energy Bureau. Moreover, the issue becomes with the 17-pages-long purported “exhibit” that is really an extension of the arguments made in the short Motion. At the outset, the Energy

Bureau must note that the “exhibit” is really a memorandum in support of the Motion that had been *previously* presented to the Energy Bureau on June 27, 2019, that is five (5) months ago¹.

3. PREPA understands there is cause for the Energy Bureau to grant an extension of time to file an opposition to the Motion.

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to grant until December 6, 2019, to file an opposition to the Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of November 2019.

/s Katuska Bolaños
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¹ At the moment of the filing of the instant motion PREPA understands that this document was not served on PREPA and other parties or intervenors. However, PREPA will confirm with the LEOs if the parties included in the notice certification are the only parties that received copy of the document.

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.

In San Juan, Puerto Rico, this 22nd day of November 2019.

s/ Katuska Bolaños
Katuska Bolaños