

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

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IN RE:

No.: CEPR-AP-2018-0001

REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY  
INTEGRATED RESOURCE PLAN

**SUBJECT:** *AES-PR's Response to PREPA's  
Informative Motion and Request To Strike AES  
ROI.*

**AES-PR's Response to PREPA's Informative Motion and  
Request To Strike AES ROI**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

AES Puerto Rico, L.P. ("AES-PR") respectfully submits this response to the motion by the Puerto Rico Electric Power Authority (PREPA) regarding AES-PR's ROI.

1. On October 2, 2019, AES-PR served three requests for information (ROIs) to PREPA. These ROIs asked PREPA to conduct eight case runs. There is no dispute that these case runs are legitimate and relevant. They would provide critical information, that is not otherwise available, to allow the Energy Bureau to analyze the tradeoffs and risks in the IRP's assumptions.

2. Since serving these ROIs, AES-PR has had constructive conversations with PREPA about them. Specifically, AES-PR has explained the specific information it seeks and narrowed the number of case runs to six, to relieve some of the burden on PREPA. AES-PR believes that these six cases can be run by PREPA without requiring any delay in the procedural schedule and, moreover, continues to stand ready to narrow the scope of its requests still further to the extent necessary. When PREPA expressed concern about completing the runs on time, AES-PR and PREPA discussed the priority of the three requests and PREPA proposed alternative production dates that would still permit the information to be analyzed by AES-PR in its supplemental testimony. AES-PR informed PREPA that, while it would not oppose PREPA's request for

additional time to complete the runs, it could not consent to an enlargement of the period to respond to the ROI set by the Energy Bureau.

3. AES-PR understands the importance of adhering to the hearing schedule set by the Energy Bureau and has no intention to seek to modify that schedule. But the information AES-PR has requested is crucial data to enable a full and fair hearing on the IRP. In light of these considerations, AES-PR believes that through further clarification and narrowing, PREPA can complete the case runs in time for them to be presented at the Hearing under the current schedule set by the Energy Bureau. AES-PR plans to have further dialogues with PREPA about these ROIs immediately. Accordingly, AES-PR respectfully asks the Energy Bureau to hold PREPA's current motion in abeyance until November 1, 2019, so that the parties can continue to discuss the ROIs. If these efforts are not successful, AES-PR will immediately inform the Bureau by close of business on that date.

RESPECTFULLY SUBMITTED.

#### CERTIFICATE OF SERVICE

We certify that this response to PREPA's Informative Motion and Request to Strike AES ROI was submitted to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov>, sent via email to [wcordova@energia.pr.gov](mailto:wcordova@energia.pr.gov), [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov); [legal@energia.pr.gov](mailto:legal@energia.pr.gov); [sugarte@energia.pr.gov](mailto:sugarte@energia.pr.gov) and [viacaron@energia.pr.gov](mailto:viacaron@energia.pr.gov), and sent to the Puerto Rico Electric Power Authority through the following email addresses: Katuska Bolaños ([kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law)); Nitza D. Vázquez Rodríguez ([n-vazquez@aepr.com](mailto:n-vazquez@aepr.com)); Carlos M. Aquino Ramos ([c-aquino@prepa.com](mailto:c-aquino@prepa.com)); Astrid I. Rodríguez Cruz ([astrid.rodriguez@prepa.com](mailto:astrid.rodriguez@prepa.com)); Jorge R. Ruíz Pabón ([jorge.ruiz@prepa.com](mailto:jorge.ruiz@prepa.com)), and Maralíz Vázquez ([mvazquez@diazvaz.law](mailto:mvazquez@diazvaz.law)). We also certify that on this date we sent a copy of this Requirement of Information to: [rtorbert@rmi.org](mailto:rtorbert@rmi.org); [victorluisgonzalez@yahoo.com](mailto:victorluisgonzalez@yahoo.com); [corey.brady@weil.com](mailto:corey.brady@weil.com); [presidente@ciapr.org](mailto:presidente@ciapr.org); [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov); [csanchez@energia.pr.gov](mailto:csanchez@energia.pr.gov); [ireyes@energia.pr.gov](mailto:ireyes@energia.pr.gov); [asanz@energia.pr.gov](mailto:asanz@energia.pr.gov); [bmulero@energia.pr.gov](mailto:bmulero@energia.pr.gov); [nnunez@energia.pr.gov](mailto:nnunez@energia.pr.gov); [gmaldonado@energia.pr.gov](mailto:gmaldonado@energia.pr.gov); [sierra@arctas.com](mailto:sierra@arctas.com); [tonytorres2366@gmail.com](mailto:tonytorres2366@gmail.com); [cfl@mcvpr.com](mailto:cfl@mcvpr.com); [gnr@mcv.com](mailto:gnr@mcv.com); [info@liga.coop](mailto:info@liga.coop); [amaneser2020@gmail.com](mailto:amaneser2020@gmail.com); [hrivera@oipc.pr.gov](mailto:hrivera@oipc.pr.gov); [jrivera@cnslpr.com](mailto:jrivera@cnslpr.com); [carlos.reyes@ecoelectrica.com](mailto:carlos.reyes@ecoelectrica.com); [ccf@tcmrslaw.com](mailto:ccf@tcmrslaw.com); [manuelgabrielfernandez@gmail.com](mailto:manuelgabrielfernandez@gmail.com); [acarbo@edf.org](mailto:acarbo@edf.org); [pedrosaade5@gmail.com](mailto:pedrosaade5@gmail.com); [rmurthy@earthjustice.org](mailto:rmurthy@earthjustice.org); [rstgo2@gmail.com](mailto:rstgo2@gmail.com); [larroyo@earthjustice.org](mailto:larroyo@earthjustice.org); [jluebke@earthjustice.org](mailto:jluebke@earthjustice.org); [acasellas@amgprlaw.com](mailto:acasellas@amgprlaw.com);

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In San Juan, Puerto Rico, on October 28, 2019.

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