

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

NEPR

Received:

Nov 1, 2019

1:16 PM

IN RE:

No.: CEPR-AP-2018-0001

REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

SUBJECT: *AES-PR's and PREPA's Joint
Motion in Compliance with Order*

JOINT MOTION IN COMPLIANCE WITH ORDER

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

AES Puerto Rico, L.P. (“AES-PR”) and the Puerto Rico Electric Power Authority (“PREPA”) respectfully submit this motion regarding AES-PR’s *Requirement of Information* (“AES’ ROI”) and the *Resolution and Order* dated October 29, 2019.

1. On October 29, 2019, the Puerto Rico Energy Bureau (“PREB”) ordered AES-PR and PREPA to file, by 3:00 p.m. on November 1, 2019, a Joint Motion specifying the scenario runs for AES’ ROI that PREPA will be able to complete within the November 27, 2019 deadline, in conjunction with ROI 9.

2. In compliance with the such Order, PREPA and AES-PR hereby inform PREB that PREPA will produce the following model runs within the completion dates set forth:

1. AES-PR retirement analysis – all assume AES-PR stops burning coal at the end of 2020.
 - a. Re-run case S4S2B with the AES-PR gas-fired 2x1 CC forced in beginning in 2023 with 15-year PPOA (2023-2037), allowing retirement of the AES-PR gas-fired plant after the end of 2037 but not before, allowing delayed retirements of existing units to fill the 2021-2022 gap as in 1.b, and no incremental solar/battery over and above what was in the S4S2B case (to be completed by 11/8);
 - b. Re-run case S4S2B with no AES-PR gas conversion allowed, no incremental solar/battery over and above what was in the S4S2B case (to be completed by 11/8);

- c. Same as (a), except using the new S4S2B Low Energy Efficiency case specified in yesterday's PREB ROI 09-01 (to be completed by 11/27);
 - d. Same as (b), except using the new S4S2B Low Energy Efficiency case (to be completed by 11/27).
2. AES PPOA extension – run cases 2.a and 2.b assuming AES-PR burns coal through Nov 2027, force in AES-PR gas-fired 2x1 CC beginning December 2027 with 15-year PPOA (12/2027-11/2042), and do not allow retirement of the AES-PR gas-fired plant. PREPA/Siemens will make best efforts to provide these results on or before 12/4; delays or non-performance will not constitute grounds for a motion to compel or another similar request for remedy on AES-PR's part to amend the Procedural Calendar.
 - a. Case S4S2B
 - b. Case new S4S2B Low Energy Efficiency (to be completed by 12/4)
3. The cases listed in this motion, which PREPA will run, replace the cases in AES-PR's original ROI and therefore, are not additive to them.

Accordingly, AES-PR and PREPA respectfully request PREB to take notice of this joint motion in compliance with the Resolution and Order dated October 29, 2019.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE

We certify that this joint motion in compliance with order was submitted to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov>, sent via email to wcordero@energia.pr.gov, secretaria@energia.pr.gov; legal@energia.pr.gov; sugarte@energia.pr.gov and viacaron@energia.pr.gov, and sent to the Puerto Rico Electric Power Authority through the following email addresses: Katiuska Bolaños (kbolanos@diazvaz.law); Nitza D. Vázquez Rodríguez (n-vazquez@aeepr.com); Carlos M. Aquino Ramos (c-aquino@prepa.com); Astrid I. Rodríguez Cruz (astrid.rodriguez@prepa.com); Jorge R. Ruíz Pabón (jorge.ruiz@prepa.com), and Maralíz Vázquez (mvazquez@diazvaz.law). We also certify that on this date we sent a copy of this joint motion to: rtorbert@rmi.org; victorluisgonzalez@yahoo.com; corey.brady@weil.com; presidente@ciapr.org; secretaria@energia.pr.gov; csanchez@energia.pr.gov; ireyes@energia.pr.gov; asanz@energia.pr.gov; bmulero@energia.pr.gov; nnunez@energia.pr.gov; gmaldonado@energia.pr.gov; sierra@arctas.com; tonytorres2366@gmail.com; cfl@mcvpr.com; gnr@mcv.com; info@liga.coop; amaneser2020@gmail.com; hrivera@oipc.pr.gov;

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In San Juan, Puerto Rico, on November 1, 2019.

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