

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

NEPR

Received:

Dec 19, 2019

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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 Supplement AES Coal
Plant Conversion Assessment

**NOTICE OF INTENT TO FILE OPPOSITION TO
LEOS' DECEMBER 17, 2019 MOTION**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority through the undersigned legal representation and hereby informs its intent to file an opposition to the *Local Environmental Organizations' Motion Requesting that the Puerto Rico Energy Board Take Judicial Notice of the Grid Modernization Plan* filed on December 17, 2019¹. The opposition will be filed on or before tomorrow, December 20, 2019.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19th day of December, 2019.

/s/ Katuska Bolaños

Katuska Bolaños

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¹ The motion is not only a request to take notice as the title reads, it's a motion requesting an extension of the deadlines to serve and respond to discovery requests.

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; jluebke@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; castrodiappalaw@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; mpietrantonio@mpmlawpr.com.

In San Juan, Puerto Rico, this 19th day of December, 2019.

s/ Katuska Bolaños
Katuska Bolaños