

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

NEPR Received: Dec 18, 2019 5:00 PM
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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 and PREPA's Joint
Motion in Compliance with Order*

JOINT RESPONSE TO DECEMBER 17, 2019 RESOLUTION AND ORDER

COME NOW, Intervenors AES Puerto Rico LP (“AES-PR”) and Local Environmental Organizations (“LEOs”) to file this Joint Response to the December 17, 2019 Resolution and Order (“12.17 Order”) of this Puerto Rico Energy Bureau (“PREB”) granting a December 13, 2019 Motion from Local Environmental Organizations to Compel AES Puerto Rico L.P. to Respond to Discovery Requests (“12.13 Motion”) ordering AES-PR to serve a response to the Local Environmental Organizations (“LEOs”) First Request of Information to AES Puerto Rico L.P. (“ROI”).

1. Counsel for AES-PR and the LEOs have conferred and agree to ask PREB to withdraw the 12.17 Order and extend the time for AES-PR to respond to the ROI until January 10, 2020.

2. The PREB should grant the extension sought because AES-PR and the LEOs agree and the LEOs acknowledge that the LEOs did not serve AES-PR directly or through counsel with the ROI or the 12.13 Motion and that AES-PR did not receive a copy of the ROI or the 12.13 Motion from the LEOs until today. Moreover, the ROI does not appear on the PREB’s electronic docket. The 12.13 Motion was uploaded to the PREB’s electronic docket on December 18, 2019.

3. The ROI includes 60 questions, plus subparts. In view of the above Due Process considerations, the scope of the ROI and the impending holidays, AES-PR and the LEOs agree

that the time to respond to the ROI should be extended to January 10, 2020, with AES-PR reserving all rights in its responses, including any objections.

WHEREFORE, AES-PR and the LEOs request that the PREB grant an extension to AES-PR to respond to the LEOs' ROI until January 10, 2020.

RESPECTFULLY SUBMITTED.

CERTIFICATE OF SERVICE

We certify that this joint response to December 17, 2019 Resolution and Order 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, 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: Katuska Bolaños (kbolanos@diazvaz.law); Nitza D. Vázquez Rodríguez (n-vazquez@aepr.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; jrivera@cnslpr.com; carlos.reyes@ecoelectrica.com; ccf@tcmrslaw.com; manuelgabrielfernandez@gmail.com; acarbo@edf.org; rstgo2@gmail.com; larroyo@earthjustice.org; jluebemann@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; voxpathulix@gmail.com; paul.demoudt@shell.com; sproctor@huntonak.com; giacribbs@huntonak.com; javier.ruajovet@sunrun.com; escott@ferraiuoli.com; mgrpcorp@gmail.com, and aconer.pr@gmail.com.

In San Juan, Puerto Rico, on December 18, 2019.

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