

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

NEPR

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IN RE:

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

CASE NO.:

CEPR-AP-2018-0001

SUBJECT:

INTERVENORS GRID MOD PLAN
MOTIONS.

MOTION TO STRIKE WRITTEN TESTIMONIES

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. The deadlines for intervenors to submit supplemental written testimonies was December 11, 2019. *See Resolution and Order* dated October 29, 2019, Sec. I; *see also Resolution and Order* dated December 13, 2019, Sec. II. After said deadlines, the parties had until December 20, 2019 to file testimonies to rebut the intervenors' written testimonies. *See Id.*

2. The following intervenors filed untimely written testimonies:

- a. Not-for-Profit Intervenors filed the *Motion Submitting Response of Dr. Eric C. Woychk* and the *Motion Submitting Supplemental Testimony [of Dr. Eric Ackerman]*, both filed on December 23, 2019 (the "NFP Testimony").
- b. PV Properties, Inc., Coto Laurel Solar Farm, Inc. and Windmar Renewable Energy, Inc. filed *Windmar's Motion to Request a Clarification and File Surrebuttal Testimony of Victor Gonzalez in Refutation of the Rebuttal Testimony of Nelson Bacalao* dated December 24, 2019 (the "PV Properties Testimony").

3. The NFP Testimonies challenge several responses that PREPA has provided in response to requests for information and thus, should be considered as intervenor's supplemental written testimony. The deadline for the filing of intervenors' supplemental written testimonies was December 11, 2019, and thus, it had elapsed more than a week before the NFP Testimonies were filed. Therefore, the NFP Testimonies should be stricken from the record.

4. Also, the procedural calendar does not allow for the filing of surrebuttal testimonies and therefore, the PV Properties Testimony should be disallowed and stricken from the record.

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to strike the *Windmar's Motion to Request a Clarification and File Surrebutal Testimony of Victor Gonzalez in Refutation of the Rebuttal Testimony of Nelson Bacalao*, the *Motion Submitting Response of Dr. Eric C. Woychk*; and the *Motion Submitting Supplemental Testimony [of Dr. Eric Ackerman]* from the record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 26th day of December 2019.

/s Katuska Bolaños
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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 26th day of December, 2019.

s/ Katuska Bolaños
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