

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

NEPR Received: Jan 31, 2020 2:57 PM
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IN RE:

INTEGRATED RESOURCE PLAN
FOR THE PUERTO RICO
ELECTRIC POWER AUTHORITY

NO. CEPR-AP-2018-0001

SUBJECT: REQUEST OF ADDITIONAL
EVIDENCE FROM PREPA

URGENT MOTION REQUESTING PREPA TO SUBMIT ADDITIONAL EVIDENCE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Environmental Defense Fund (EDF) and respectfully states and request the following:

1. On January 30, 2020, the Puerto Rico Energy Bureau (PREB) held a technical conference as part of an investigation proceeding related to the impacts of recent seismic events on the Puerto Rico Electric and Power Authority's (PREPA) infrastructure. See Case NEPR-MI-2020-0003
2. Related to the above-mentioned Technical Conference, on January 24, 2020 PREPA filed with the PREB an Informative and Compliance with Order Motion referencing a document titled *Earthquake Damages at Costa Sur – Inspection Summary* and included as Exhibit III. See PREPA's Jan. 24, 2020 Motion. However, PREPA is seeking confidential treatment of such document.
3. Notwithstanding the above, on January 17, 2020 the PREB issued a Resolution on Evidentiary Hearing Format and Guidelines. See PREB's January 17, 2020 Resolution. The hearings scheduled for Monday, January 7, 2020 will include a Panel on January 2020 Earthquakes' Effects on Existing Resources and Core IRP Elements.

4. Furthermore, on January 31, 2020 the PREB issued a Resolution granting PREPA's request for additional witnesses to testify on the hearing, particularly expert witnesses on the Panel referenced in Paragraph 3 of this Motion.
5. Considering that the document titled *Earthquake Damages at Costa Sur – Inspection Summary* presented to the PREB as part of their investigation on the earthquakes' effects on PREPA infrastructure is directly relevant to the IRP proceeding under your consideration, we respectfully request that it be submitted and admitted into evidence as part of the IRP proceeding under your consideration.
6. Therefore, in light that the Panel discussing the referenced matters is scheduled for Monday, February 7, 2020, EDF respectfully requests that if this Motion is granted that the PREB orders the referenced *Inspection Summary*, and any other document it deems related, to be filed and shared with all parties of this case on or before 6:00 pm on Sunday, February 6, 2020 so we can prepare for cross examination.

WHEREFORE, EDF respectfully requests that the Bureau take notice on the above-mentioned MOTION and GRANT our urgent request.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 31st DAY OF JANUARY, 2020.

ENVIRONMENTAL DEFENSE FUND

/s/Agustín F. Carbó Lugo
Agustín F. Carbó Lugo
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New York, New York 10010
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IT IS HEREBY CERTIFIED that the foregoing was sent to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov> and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez (n-vazquez@aepr.com); Astrid I. Rodríguez Cruz (astrid.rodriguez@prepa.com); Jorge R. Ruíz Pabón (jorge.ruiz@prepa.com), Katuska Bolaños (kbolanos@diazvaz.law), and Maralíz Vázquez (mvazquez@diazvaz.law).

IN SAN JUAN, PUERTO RICO, THIS 31st DAY OF JANUARY, 2020.

ENVIRONMENTAL DEFENSE FUND

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CERTIFICATION OF FILING AND SERVICE

I hereby certify that on January 23, 2020, I have sent the above Motion to the following intervenors: Javier Rúa-Jovet, Sunrun (javier.ruajovet@sunrun.com); Pedro Saadé-Lloréns, Ruth Santiago and Raghu Murthy, Local Environmental Organizations (pedrosaade5@gmail.com, rstgo2@gmail.com and rmurthy@earthjustice.org); Carlos A. Reyes and Carlos E. Colón-Franceschi, EcoEléctrica (carlos.reyes@ecoelectrica.com and ccf@tcmrslaw.com); Roy Torbert, Rocky Mountain Institute (rtorbert@rmi.org); Víctor L. González and Marc G. Roumain-Prieto, Grupo Windmar (victorluisgonzalez@yahoo.com, mgrpcorp@gmail.com); Hannia B. Rivera-Díaz and Jessica Rivera-Pacheco, Oficina Independiente de Protección al Consumidor (hrivera@oipc.pr.gov, jrivera@cnslpr.com); Manuel Fernández-Mejías, Empire Gas Company (manuelgabrielfernandez@gmail.com); Axel E. Colón-Pérez, AES Puerto Rico (axel.colon@aes.com, sboxerman@sidley.com and bmundel@sidley.com); Alexandra Casellas-Cabrera and Corey Brady, National Public Finance Guarantee (acasellas@amgprlaw.com and corey.brady@weil.com); Mariana Ortíz-Colon and Raúl Negrón-Casanovas, Progression Energy (maortiz@lvprlaw.com and rnegron@dnlawpr.com); Paul De Moudt, Shell (paul.demoudt@shell.com); Eugene Scott-Amy, Wartsila North America (escott@ferraiuoli.com and sproctor@huntonak.com); Jérampfel Lozada-Ramírez, ACONER (aconer.pr@gmail.com); Fernando E. Agrait, Non Profit Intervenors (agraitfe@agraitlawpr.com); Pablo Vázquez-Ruíz, CIAPR (presidente@ciapr.org); Arctas Capital Group (sierra@arctas.com, tonytorres2366@gmail.com); SESA-PR & Caribe GE (cfl@mcvpr.com); League of Cooperatives of Puerto Rico and AMANESER 2025 (info@liga.coop, amaneser2020@gmail.com).

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