

COMMONWEALTH OF PUERTO RICO`
Public Service Regulatory Board
Energy Bureau
WORLD PLAZA BUILDING
268 MUÑOZ RIVERA AVE,
SAN JUAN, PR. 00918

NEPR
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Jan 27, 2020
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IN RE: Puerto Rico Electric Power Authority's
Integrated Resource Plan

Case Number: CEPR-AP-2018-0001

Subject: PREPA's Request for Clarification

Opposition to PREPA's Request for Clarification

COMES NOW, PV Properties, Inc., Coto Laurel Solar Farm, Inc. and Windmar Renewable Energy, Inc. (collectively, "WindMar"), through the undersigned legal counsel, respectfully state and pray:

1. On January 26, PREPA filed a Motion "Request for Clarification" regarding the IRP hearing guidelines previously issued by the Energy Bureau. Specifically, PREPA requested the Energy Bureau to establish five (5) minutes as the maximum time for a party to question a witness.
2. WindMar understands the hearings must adhere strictly to the time allocated to each panel but extending such rigidness to the questioning of a party is not reasonable. A witness could take their time to answer a question and therefore limit a party's turn at questioning.
3. The Energy Bureau's guidelines on Witness Examination, included in its January 17, 2020 Resolution, are clear and do not require clarification. Each party has at least five (5) minutes and at the Energy Bureau's discretion additional time may be extended within the panel's schedule.

4. The amount of parties and questions certainly represent a challenge for the Energy Bureau and its strict schedule. Nevertheless, other mechanisms for saving time should be considered for example avoiding repetitive questions and procedural measures.
5. WindMar respectfully requests the Energy Bureau to **not** limit questioning to five (5) minutes as requested in PREPA's request.

Respectfully submitted in San Juan, Puerto Rico, on January 27, 2020.

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CERTIFICATE OF SERVICE

We hereby certify to have notified copy of this document to the following people:

The Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov> and through wcordero@energia.pr.gov, secretaria@energia.pr.gov; legal@energia.pr.gov; sugarte@energia.pr.gov and viacaron@energia.pr.gov, and to the Puerto Rico Electric Power Authority through the following email addresses: Katuska Bolaños (kbolanos@diazvaz.law); Nitza D. Vázquez Rodríguez (n-vazquez@aeepr.com); Carlos M. Aquino Ramos (caquino@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 document to: rtorbert@rmi.org; 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;

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In San Juan, Puerto Rico, on January 27, 2020.