

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

<b>NEPR</b>  <b>Received:</b>  <b>Jan 29, 2020</b>  <b>7:02 PM</b>
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**IN RE:**

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

**CASE NO.:**

CEPR-AP-2018-0001

**SUBJECT:**

Evidentiary Hearing Witnesses

**REQUEST TO INCLUDE ADDITIONAL WITNESSES  
FOR EVIDENCIARY HEARING PANELS**

TO THE 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 Energy Bureau of the Puerto Rico Service Regulatory Board (the “Energy Bureau”) will hold an Evidentiary Hearing during the week of February 3 to February 7, 2020, to further evaluate the draft Integrated Resource Plan (IRP).
2. On January 17, 2020, the Energy Bureau issued a Resolution outlining the Evidentiary Hearing format and guidelines (the “Hearing Guidelines”). As per the Hearing Guidelines, the Evidentiary Hearing areas of examination are divided in panels. The Energy Bureau selected and designated the witnesses for each panel. The intervenors may cross-examine these witnesses. All the witnesses must be able to address the list of issues that the Energy Bureau listed as the issues that are going to be discussed during each of the panels’ sessions.
3. The Puerto Rico Electric Power Authority (PREPA) has reviewed the each of the panels’ issues listed as subjects for discussion and also, the witnesses that the Energy Bureau included to answer questions related to said subjects in each panel. After a careful evaluation of the issues listed and the PREPA officers and consultants that have been summoned, PREPA understands that

there is a true need to add certain PREPA officers and consultants as witnesses to address some of the panels' listed issues.

4. There are several PREPA officers that must be included in the panels to address specific issues. Also, all of the panels include PREPA's expert, Dr. Nelson Bacalao, as witness. However, all the consulting work that Siemens does for PREPA is not made by Dr. Bacalao only. Dr. Bacalao worked side by side with Dr. Marcelo Saenz in the preparation of the draft IRP, preparing model runs and providing responses to the discovery requests. The Energy Bureau is aware of this because Dr. Saenz has already appeared before the Energy Bureau and has provided testimony for the draft IRP under consideration and also in the past, during the process to consider the operative IRP. PREPA also notes it is necessary that the Energy Bureau allows attorney James Bowe to appear in additional panels since he is the ideal witness to address some of the issues listed. Like Dr. Saenz, Atty. Bowe appeared at the Technical Hearing, provided testimony and also, answered several discovery requests. Both, Dr. Saenz and Atty. Bacalao are key to address important issues listed to be discussed during the Evidentiary Hearing.

5. The appearance of additional PREPA officers and consultants is necessary to correctly and responsibly address the list of issues to be discussed and for which PREPA's testimony will be elicited. The addition of these witnesses will assist PREPA to better inform and educate the Energy Bureau to achieve the ultimate purpose of the Evidentiary Hearing, put the Energy Bureau in a position to make a determination on the matter at hand. *See* Guideline Resolution, pag. 1. Therefore, PREPA respectfully requests the Energy Bureau to allow and include the above-listed PREPA officers and consultants as PREPA's witnesses for the Evidentiary Hearing.

6. The following charts list the witnesses that PREPA wishes that the Energy Bureau adds to each of the panels, their title and the issues they are prepared to address during the Evidentiary Hearing.

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel A: January 2020 Earthquakes' Effect on Existing Resources and Core IRP Elements	Eng. Daniel Hernández Morales	Director of Generation, PREPA	Issues nos. 1-5
	Eng. José Sepúlveda	Director of Transmission and Generation (T&D), PREPA	Issue no. 6
	Dr. Marcelo Saenz	Engagement Manager, Siemens	All

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel B: Existing PREPA and Contract Resources and Related Issues	Atty. James F. Bowe	Attorney, King & Spalding LLP	All
	Dr. Marcelo Saenz:	Engagement Manager, Siemens	All
	Mr. Fernando M. Padilla	Director of Project Management Office (PMO) PREPA	Issue no. 2
	Eng. Daniel Hernández Morales	Director of Generation, PREPA	Issue nos. 1, 4, 5
	Eng. Jose Sepúlveda	Director of Transmission and Generation (T&D), PREPA	Issues nos. 6 & 7
	Eng. Luisette RíosCastañer	Head Environmental Protection and Quality Assurance Division, PREPA	Issue no. 5

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel C: Fuel Prices and Fuel Infrastructure and New Gas Resources	Eng. José Vázquez	Technical Advisor for Generation, PREPA	All
	Eng. Edwin Barbosa	Fuel Office Administrator, PREPA	Issues nos. 2 & 3

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel D: Load Forecast, Energy Efficiency (EE) and Demand Response (DR) as Resources	Dr. Marcelo Saenz	Engagement Manager, Siemens	All

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel E: Solar PV and Energy Storage Resources - Utility scale and Distributed Generation (DG) scale	Dr. Marcelo Saenz	Engagement Manager, Siemens	All

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel F: Transmission and Distribution System Documentation, Planning and Analysis - Including Minigrids / MicroGrids	Atty. Arturo Deliz	Director of Disaster Funds Management Office (DFMO) PREPA	Issue no. 1
	Dr. Marcelo Saenz	Engagement Manager, Siemens	All

<b>Panel</b>	<b>Witness</b>	<b>Title</b>	<b>Issues Addressed by Witness</b>
Panel G: Other New Resources: onshore wind, offshore wind, hydro	Dr. Marcelo Saenz	Engagement Manager, Siemens	All

**WHEREFORE**, the Puerto Rico Electric Power Authority requests the Energy Bureau to allow the PREPA officers and consultants listed above to appear as PREPA's witnesses in the Evidentiary Hearing.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 29<sup>th</sup> day of January 2020.

*/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; jluebkekmann@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; castrodierralaw@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](mailto:mpietrantonio@mpmlawpr.com).

In San Juan, Puerto Rico, this 29<sup>th</sup> day of January 2020.

s/ Katuska Bolaños  
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