

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

NEPR

Received:

Jan 31, 2020

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IN RE:

INTEGRATED RESOURCE PLAN FOR THE
PUERTO RICO ELECTRIC POWER
AUTHORITY

CASE NO.: CEPR-AP-2018-0001

SUBJECT: PETITION OF PROGRESSION
ENERGY TO INTERVENE

**URGENT MOTION FOR EXPERT WITNESS TO APPEAR
VIA VIDEO CONFERENCE OR TELEPHONE**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW Progression Energy (“PE”), through the undersigned counsels, and respectfully states, alleges and claims as follows:

1. On December 13, 2019, the Puerto Rico Energy Bureau (“PREB”) issue a Resolution and Order modifying the procedural calendar and scheduling the Evidentiary Hearings for February 3, 2020 until February 7, 2020.
2. On January 17, 2020, the PREB issue a Resolution establishing the Evidentiary Hearing Format and scheduling PE’s expert witness testimony, Mr. Kevin Banister, for February 5, 2020 at 4:00 p.m.
3. Due to unforeseen events on the life of Mr. Banister, it is nearly impossible for him to be present to testify next week.
4. Therefore, PE humbly requests the PREB to allow Mr. Banister to testify via an alternate method available at the Bureau, such as telephone or video conference.

5. PE's request is done in good faith and by the understanding that it will not affect the effectiveness and efficiency of the Evidentiary Hearing.

RESPECTFULLY SUBMITTED,

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

CERTIFICATION OF FILING AND SERVICE

I hereby CERTIFY that on **January 31 2020**, I have sent the above Urgent Motion for Expert Witness to appear via video conference or telephone to the Puerto Rico Energy Bureau through its electronic filling tool at <https://radicacion.energia.pr.gov>; and to secretaria@energia.pr.gov and wcordero@energia.pr.gov; the Bureau's Office of Legal Affairs to legal@energia.pr.gov and sugarte@energia.pr.gov and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez n-vazquez@aeep.com; Astrid I. Rodríguez Cruz astrid.rodriguez@prepa.com; Katuska Bolaños kbolanos@diazvaz.law and to Jorge R. Ruíz Pabón Jorge.ruiz@prepa.com. And to: acarbo@edf.org; javier.ruajovet@sunrun.com; pedrosaade5@gmail.com; rmurthy@earthjustice.org; carlos.reyes@ecoelectrica.com; ccf@tcmsrlaw.com; victorluisgonzalez@yahoo.com; mgrpcorp@gmail.com; hrivera@oipc.pr.gov; jrivera@cnspr.com; manuelgabrielfernandez@gmail.com; acasellas@amgprlaw.com; corey.brady@weil.com; paul.demoudt@shell.com; agraitfe@agraitlawpr.com; castrodiéppalaw@gmail.com; voxpathulix@gmail.com; cfl@mcvpr.com; sierra@arctas.com; tonytorres2366@gmail.com; info@liga.coop; amaneser2020@gmail.com; escott@ferraiuoli.com; sproctor@huntonak.com; mpietrantoni@mpmlawpr.com; apagan@mpmlawpr.com; sboxerman@sidley.com; bmundel@sidley.com;

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