

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

NEPR Received: Jan 23, 2020 3:59 PM
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IN RE:

INTEGRATED RESOURCE PLAN
FOR THE PUERTO RICO
ELECTRIC POWER AUTHORITY

NO. CEPR-AP-2018-0001

SUBJECT: EVIDENTIARY HEARING
APPEARANCE SCHEDULING

MOTION FOR EVIDENTIARY HEARING APPEARANCE SCHEDULING

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On October 23, 2019, EDF filed with the Puerto Rico Energy Bureau (PREB) an Expert Witness Testimony from Dr. Elizabeth A. Stanton, of the Applied Economic Clinic.
2. That on October 29, 2019, the PREB modified the procedural calendar for this case and set the Evidentiary Hearings to the week of January 13-17, 2020. Oct. 29, 2019 Resolution and Order. Subsequently, on December 13, 2019 the PREB modified again the Procedural Calendar and set the Evidentiary Hearings to the week of February 3-7, 2020 (hereinafter, “Modified Evidentiary Hearing”). Dec. 13, 2019 Resolution and Order.
3. On January 17, 2020, the PREB issued a Resolution establishing the Hearing Format and Schedule, and instructed the parties to present a timely motion in case of a witness unavailability.
4. That Dr. Elizabeth A. Stanton has prior professional commitments on the last days of the Modified Evidentiary Hearing and can only be available for appearance and cross-examination on February 4-6, 2020.

5. Therefore, considering that the mentioned commitments of Dr. Stanton were scheduled prior to the Modified Evidentiary Hearing and Scheduling Resolutions, EDF respectfully requests the PREB consider her undue hardship to appear at such hearings on February 7, 2020 and waive her from appearing on the last day of its programmed schedule for the required cross-examination of witnesses. Dr. Stanton can be available for cross-examination the second, third, and fourth day of the hearings.

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

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 23rd DAY OF JANUARY, 2020.

ENVIRONMENTAL DEFENSE FUND

/s/Agustín F. Carbó Lugo
Agustín F. Carbó Lugo
TSPR-RUA No. 13,801
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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@aeepr.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 23rd DAY OF JANUARY, 2020.

ENVIRONMENTAL DEFENSE FUND

/s/Agustín F. Carbó Lugo
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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, mpietrantoni@mpmlawpr.com and apagan@mpmlawpr.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); Jéramfel 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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