

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

NEPR Received: Jan 30, 2020 9:59 PM
--

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 ENG. GARY F. SOTO FERNÁNDEZ
AS WITNESS IN PANEL A OF EVIDENCIARY HEARING**

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”).
3. As per the Hearing Guidelines, the witnesses summoned to testify in Panel A will be required to provide testimony in regards to the January 2020 Earthquakes' Effect on Existing Resources and Core IRP Elements. There is no pre-filed testimony or responses to discovery regarding this topic.
4. Today, January 30, 2020, the Energy Bureau held a Technical Hearing in case NEPR-MI-2020-003, *In Re: Impacto de los Recientes Eventos Sísmicos en el Sistema Eléctrico de Puerto Rico*. The Puerto Rico Electric Power Authority (PREPA) was represented by several directors and department heads during the Technical Hearing. Eng. Gary F. Soto Fernández, Head of the

Electric System Operations Division of PREPA, was instrumental in providing information and discussing and detailing the technical reasons that led to the January 6 load shed and the January 7 total blackout, the effects of the recent seismic events on PREPA's generation assets and operations and also, the steps taken towards the restoration of the service. Eng. Gary Soto proved to be an essential PREPA officer for the discussion of the recent seismic events and their effect on PREPA's operations.

5. For the reasons stated above, PREPA requests the Energy Bureau to allow Eng. Soto to appear as witness in Panel A of the Evidentiary Hearings. As it is evident after today's Technical Hearing, Eng. Soto is prepared to answer questions related to the issues listed for discussion in Panel A. The addition of Eng. Soto as witness in Panel A will allow 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.

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to allow Eng. Gary F. Soto Fernández to appear as PREPA's witnesses in Panel A of the Evidentiary Hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of January 2020.

/s Katuska Bolaños
Katuska Bolaños
kbolanos@diazvaz.law
TSPR 18,888

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.
290 Jesús T. Piñero Ave.
Scotiabank Tower, Suite 11-E
San Juan, PR 00918
PO Box 11689
San Juan, PR 00922-1689
Tel. (787) 395-7133
Fax. (787) 497-9664

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@agrailawpr.com; maortiz@lvprlaw.com; rnegron@dnlawpr.com; castrodiappalaw@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.

In San Juan, Puerto Rico, this 30th day of January 2020.

s/ Katuska Bolaños
Katuska Bolaños