

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

<p>NEPR</p> <p>Received:</p> <p>Jan 15, 2020</p> <p>3:37 PM</p>

IN RE: REQUEST FOR APPROVAL OF AMENDED AND RESTATED POWER PURCHASE AND OPERATING AGREEMENT WITH ECOELÉCTRICA AND NATURAL GAS SALE AND PURCHASE AGREEMENT WITH NATURGY

CASE NO.:
NEPR-AP-2019-0001

SUBJECT:
Request for Technical Conference

**SECOND REQUEST FOR TECHNICAL CONFERENCE
TO DISCUSS MOTION FOR RECONSIDERATION**

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:

On November 5, 2019, PREPA¹ requested PREB to review and approve the EcoEléctrica and Naturgy Agreements. On November 27, 2019, PREB denied without prejudice PREPA’s request and entered the *Resolution and Order* granting PREPA leave to refile its Petition *after* PREB issues a Final Resolution regarding the proposed IRP that is pending approval. Thereafter, on December 9, 2019, PREPA filed *Request for Reconsideration of Resolution and Order on Denial Without Prejudice of Approval of Amended and Restated Power Purchas and Operating Agreement with EcoElectrica and Natural Gas Sale and Purchase Agreement with Naturgy* (the “Request for Reconsideration”).

¹ Capitalized terms not defined herein shall have the same meaning provided in the *Motion Informing Approval by FOMB of the Puerto Rico Electric Power Authority’s Amended and Restated Power Purchase and Operating Agreement with EcoElectrica and Natural Gas Sale and Purchase Agreement with Naturgy and Request for Technical Conference to Discuss Motion for Reconsideration* (the “Motion for Technical Conference”)

In response to PREPA's Request for Reconsideration, on December 18, 2019, PREB entered a Resolution whereby it notified that "it will consider the Request for Reconsideration filed by PREPA". *See* Resolution at p. 2.

On December 26, 2020, PREPA filed a Motion for Technical Conference in which PREPA requested PREB to schedule a technical conference to adequately discuss the merits of PREPA's Request for Reconsideration and the merits of the Agreements. A technical conference will allow PREPA to answer in detail to PREB any questions it has regarding the Agreements, the benefits of the same and their importance for a comprehensive transition to renewables. As of today, PREB has not ruled on this request.

PREPA hereby reasserts and incorporates the arguments made in the Motion for Technical Conference and reasserts the request for PREB to schedule a technical conference to be held **as soon as possible**.

WHEREFORE, PREPA requests PREB to **SCHEDULE** a technical conference to address PREPA's Request for Reconsideration and the negotiated Agreements.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th 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: ccf@tcm.law.

In San Juan, Puerto Rico, this 15th day of January 2020.

/s Katuska Bolaños
Katuska Bolaños