

COMMONWEALTH OF PUERTO RICO`  
Public Service Regulatory Board  
Energy Bureau  
WORLD PLAZA BUILDING  
268 MUÑOZ RIVERA AVE,  
SAN JUAN, PR. 00918

NEPR  
Received:  
Dec 24, 2019  
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IN RE: Puerto Rico Electric Power Authority's  
Integrated Resource Plan

Case Number: CEPR-AP-2018-0001

Subject: Written Surrebuttal Testimony of  
Victor Gonzalez in refutation of Nelson  
Bacalao's Rebuttal Testimony

**WINDMAR'S MOTION TO REQUEST A CLARIFICATION AND FILE  
SURREBUTTAL TESTIMONY OF VICTOR GONZALEZ IN REFUTATION  
OF THE REBUTTAL TESTIMONY OF NELSON BACALAO**

COMES NOW, PVP Properties, Inc., Coto Laurel Solar Farm, Inc. and Windmar Renewable Energy, Inc. (collectively, "WindMar"), through the undersigned legal counsel, requests a clarification and hereby submits the Written Rebuttal Testimony of Victor Gonzalez in refutation of Nelson Bacalao's Rebuttal Testimony.

The clarification we respectfully request is in relation to Dr. Bacalao's Rebuttal Testimony filed on December 20, 2019. Specifically, Dr. Bacalao's answer beginning on page 16 of 22 appears to be incomplete. Our request is for the following to be clarified:

**Is Dr. Bacalao's answer beginning on page 16 of 22 complete? Lines 295 (starts with a "Q." rather than A.) onward, particularly line 302, are difficult to understand. It seems some lines are missing and does not make sense as written.**

Respectfully submitted in San Juan, Puerto Rico, on December 24, 2019.



Por: \_\_\_\_\_  
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## CERTIFICATE OF SERVICE

We hereby certify to have notified copy of this document to the following people:

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In San Juan, Puerto Rico, on December 24, 2019.

1

2       **I.       INTRODUCTION**

3

4       **Q.       Please state your name and business address.**

5

6       A. My name is Victor Luis Gonzalez and my business address is #206 San Francisco Street San  
7       Juan, Puerto Rico 00901.

8

9       **Q.       On whose behalf are you testifying?**

10

11       A.       I am testifying on behalf of PVP Properties, Inc., Coto Laurel Solar Farm, Inc. and  
12       Windmar Renewable Energy, Inc. (collectively, "WindMar"). I am President and majority  
13       shareholder of each one of these entities.

14

15       **Q.       Have you previously testified before the Energy Bureau?**

16

17       A.       Yes, I have provided testimony in PREPA's first Integrated Resource Plan petition and  
18       also in this current IRP petition docket in representation of the same Intervenor, WindMar.

19

20

21 **Q. What is the purpose of your Surrebuttal testimony?**

22 My Surrebuttal Testimony's purpose is to refute Dr. Bacalao's rebuttal testimony on what should  
23 be, but is not, an essential element of PREPA's Integrated Resource Plan; storage. Clearly,  
24 PREPA's a long-term plan should take into consideration our island's forward-looking public  
25 policy on energy rather than promote the status quo.

26 **II. SURREBUTTAL TESTIMONY**

27

28 **Q. Dr. Bacalao, in his rebuttal of your Testimony, indicates that “storage is a**  
29 **fundamental component for the secure and economic integration of the renewable**  
30 **generation and as the penetration increases the role of these resources in energy shifting**  
31 **and frequency regulation will become central”. Do you agree?**

32

33 A. Precisely because I agree on the importance of energy storage my Testimony is that PREPA  
34 should have considered storage more comprehensively throughout the IRP. Storage needs to be  
35 considered at all renewable scale levels and not exclusively with utility scale projects. Storage at  
36 residential, commercial, industrial and vehicle-to-grid (V2G) are happening today.

37 Plenty of successful storage projects implemented worldwide have established storage feasibility  
38 and consulting firms such as Siemens either know or should know this.

39

40 **Q. On the same subject, Dr. Bacalao concluded that it “would be imprudent even if it**  
41 **were feasible for PREPA to depend on the hope that the resources will be installed in the**

42 **amounts required and that third parties will provide the control of the storage as required**  
43 **for effective integration”. What are your thoughts on this conclusion?**

44

45 A. My first thought is that the blatant failure of PREPA to comply with existing renewable energy  
46 Laws and Regulations and its cavalier attitude toward renewable energy investors is why there  
47 may be no **“hope”** that renewable energy resources be installed at the scale established by public  
48 policy and wanted by the people. I believe PREPA’s IRP petition, and statements such as this one  
49 made by its consultant, reflect its intentions to undercut all **“hope”** for renewable resources in an  
50 attempt to justify business as usual, new LNG generation and new peaker units.

51

52 In spite of PREPA’s daily efforts to slow residential integration of solar and storage solutions they  
53 continue to be deployed. It is **“imprudent”** to think that consumers will not invest in PV plus  
54 storage systems that provide reliable and resilient renewable energy at the same or lower kWh cost  
55 than what PREPA currently charges. Are these thousands of PREPA costumers buying PV + BESS  
56 systems acting **“imprudently”**?

57

58 If PREPA were to cooperate, much more would be achieved and we could illustrate how  
59 **“imprudent”** Dr. Bacalao’s rebuttal testimony is.

60

61 Surprisingly Dr. Bacalao disputes that controls are available for both utility scale and residential  
62 battery storage systems to allow for **effective integration** of PV and BESS to the grid when his

63 employer, Siemens, markets products for these purposes. Siemens is one of many vendors that  
64 have implemented operation controls for the effective integration of storage systems.

65

66 Currently the energy industry's literature is full of examples on how PV plus Storage is  
67 **controlled** to provide:

- 68 • T & D congestion relief,
- 69 • Voltage support,
- 70 • Power quality,
- 71 • Demand-peak limiting,
- 72 • Arbitrage & load leveling,
- 73 • PV Self-consumption,
- 74 • Backup provision,
- 75 • Reserves,
- 76 • Frequency Regulation. and
- 77 • Load Following.

78 I am sure Dr. Bacalao cannot refute this assertion.

79

80 **Q. Do you believe Puerto Rico's public policy and regulations are sufficient for**  
81 **implementing renewables generation?**

82

83 A. Navigant Research claims that the ability of prosumers to actively participate in grid  
84 solutions hinges largely upon the market designs of regulators and policymakers. I believe Puerto  
85 Rican policy makers and regulators have provided those designs. Additional regulations will be  
86 made as needed and as new technologies are deployed.

87

88 **Q. Does this conclude your direct testimony?**

89

90 A. Yes, it does.

91