

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

**NEPR**

**Received:**

**Feb 5, 2020**

**9:37 AM**

**IN RE:**

REVIEW OF THE PUERTO RICO  
ELECTRIC POWER AUTHORITY  
INTEGRATED RESOURCE PLAN

**CASE NO.:** CEPR-AP-2018-0001

**SUBJECT:** Evidentiary Hearing

**ECOELÉCTRICA, L.P.'s MOTION TO SUPPLEMENT THE RECORD**

COMES NOW EcoEléctrica, L.P. ("EcoEléctrica"), by and through its counsel of record, and respectfully states as follows:

The Puerto Rico Energy Bureau (the "Bureau") held an evidentiary hearing on February 3, 2020 to further assess the feasibility and potential magnitude of energy savings resulting from the adoption of the Integrated Resource Plan ("IRP") filed by the Puerto Rico Electric Power Authority ("PREPA") on June 7, 2019.

On January 17, 2020, the Bureau issued a Resolution establishing the format and guidelines for the evidentiary hearing in this case. *See* PREB Resolution re: Evidentiary Hearing Format and Guidelines, Case No. CEPR-AP-2018-0001 (Jan. 17, 2020). In the resolution, the Energy Bureau organized the questioning of witnesses by subject-matter panels and also identified the witnesses that would be appearing on each panel.

During the evidentiary hearing for Panel A held on February 3, 2020, the PREPA witnesses answered questions and provided testimony in connection with the effect of the January 202 Earthquakes on the EcoEléctrica power plant. During EcoEléctrica's turn for cross examination, EcoEléctrica asked and was granted permission to file, in writing, a Motion providing information as to the status of power plant and the effects of these Earthquakes on its facility.

Accordingly, the following is a brief description of the effects of the January 2020 Earthquakes on the EcoEléctrica facility located in Peñuelas. Specifically, we provide the information to be covered by Panel A, as established in Exhibit A of the Resolution., related to the status of the operation, expected repairs, and return-to-service information for the EcoEléctrica plant.

#### Earthquake Effects

- The January 7<sup>th</sup>, 2020, 04:24h Magnitude 6.4 earthquake induced vibrations beyond permitted limits instantaneously activating the protection of three units.
- The initial structural inspections were completed on January 11, 2020
- These inspections revealed the following:
  - Maritime facilities - moderate structural damages were identified at the pier expansion joints, and pipe rack supports. Repairs will be completed in the following months, but these moderate damages did not compromise the operational status of the maritime facilities.
  - LNG Unloading line – four expansions joints were found with damage. Their replacement is ongoing with a scheduled commissioning date of February 12, 2020.
  - LNG Tank – inspection completed did not reveal any findings. Settlement study was completed, results demonstrated that the Tank settlement behaved within design criteria. Tank, vaporization and auxiliary systems are operational and in service since Wednesday January 15, 2020.

- Natural gas pipeline to Costa Sur – structural damages to pipeline supports and restraints. No damages to the pipeline. Supports repairs should be completed during the month of March 2020.
- Combined Cycle Demineralized Water Tank – a crack was found at the bottom of the tank. Tank was repaired and returned to service on January 12, 2020.

### Status of Operation of Turbines

#### Turbines #1 and #2

- January 11, 2020 – PREPA provided back feed power to the facility approximately at 08:30h. Process and large equipment testing commenced.
- January 15, 2020 – EcoEléctrica safely returned to service combustion turbines #1 & #2. Since then, both units are operating normally on natural gas. EcoEléctrica is available to provide PREPA with 345MW of firm capacity under current mode of operation.

#### Steam Turbine

- Before the earthquake events, the Steam Turbine had a scheduled major maintenance inspection to be conducted on March 2020. This maintenance schedule was approved by PREPA on October 23, 2019.
- During the Unit's forced outage caused by the January 7th, 2020, 04:24h Magnitude 6.4 earthquake, EcoEléctrica took the opportunity to visually inspect the steam turbine L-0 blades and sleeves according to a OEM service bulleting TAES-TTIL-KS019001X Rev 0 dated June 14, 2019.

- This initial inspection showed five sleeves with damages and cracks. These are non-related to the earthquake and were transmitted to Toshiba the original equipment manufacturer of the turbine. Toshiba recommended that EcoEléctrica perform further inspections that would require turbine rotor-out. A turbine rotor-out inspection requires an extended outage and is part of a steam turbine major maintenance inspection.
- EcoEléctrica requested PREPA to expedite the major inspection originally scheduled for March 2020 and perform it during the month of January and February 2020. The acceleration of the major outage benefited PREPA's electric system by avoiding the incremental impact of EcoEléctrica steam turbine availability. EcoEléctrica's request was granted.
- At the time of this report, EcoEléctrica major inspection is progressing as planned and the unit is scheduled to return to service during the third week of February 2020.

To the extent EcoEléctrica's findings above are directly relevant to the IRP proceeding, we request that they be fully admitted into evidence as part of the Bureau's record in this case.

**WHEREFORE**, EcoEléctrica requests that the Bureau take notice of the above and grant EcoEléctrica's motion, along with any other relief that the Bureau deems just and proper.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 4th day of February 2019.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, an exact copy of the foregoing document was notified by electronic mail to: astrid.rodriguez@prepa.com, jorge.ruiz@prepa.com, n-vazquez@aepr.com, c-aquino@prepa.com, mvazquez@diazvaz.law, kbolanos@diazvaz.law, acarbo@edf.org, javier.ruajovet@sunrun.com, pedrosaade5@gmail.com, rmurthy@earthjustice.org, carlos.reyes@ecoelectrica.com, victorluisgonzalez@yahoo.com, mgrpcorp@gmail.com, hrivera@oipc.pr.gov, jrivera@cnslpr.com, manuelgabrielfernandez@gmail.com, acasellas@amgprlaw.com, corey.brady@weil.com, maortiz@lvprlaw.com, rnegron@dnlawpr.com, paul.demoudt@shell.com, escott@ferraiuoli.com, sproctor@huntonak.com, agraitfe@agraitlawpr.com, castrodiieppalaw@gmail.com, voxpopulix@gmail.com, cfl@mcvpr.com, sierra@arctas.com, tonytorres2366@gmail.com, info@liga.coop, amaneser2020@gmail.com, apagan@mpmlawpr.com, sboxerman@sidley.com, bmundel@sidley.com.

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