

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

**NEPR**

**Received:**

**Feb 5, 2020**

**12:32 PM**

**IN RE:**

INTEGRATED RESOURCE PLAN FOR THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY

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

**SUBJECT:** PETITION OF PROGRESSION  
ENERGY TO INTERVENE

**INFORMATIVE MOTION**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW Progression Energy (“PE”), through the undersigned counsels, and respectfully states, alleges and claims as follows:

1. On January 31, 2020, PE filed an “Urgent Motion” informing the Puerto Rico Energy Bureau (“PREB”) that, due to unforeseen events on the life of PE’s expert witness, Mr. Kevin Banister, it was nearly impossible for him to be present to testify at today’s Evidentiary Hearing.
2. Consequently, PE requested the PREB to allow Mr. Banister to testify via an alternate method available at the Bureau, such as telephone or video conference.
3. The PREB denied our request, stating that an appearance via video conference or telephone is not consistent with the nature and format of the Evidentiary Hearing.
4. As PE stated in its Urgent Motion, unforeseen family and personal matter in the life of Mr. Banister prohibits him to travel and physically testify today.
5. Therefore, PE respectfully requests the PREB to take notice of the above and, in consequence, excuse Mr. Banister for today’s hearing.

6. Moreover, since Mr. Banister testimony relies, for the most part, on third party information and reports<sup>1</sup>, including the Puerto Rico Electric Power Authority's own report<sup>2</sup>, PE humbly request the PREB to consider his written testimony in this process.

RESPECTFULLY SUBMITTED,

IN SAN JUAN, PUERTO RICO, THIS 5 DAY OF FEBRUARY 2020.

### **CERTIFICATION OF FILING AND SERVICE**

I hereby CERTIFY that on **February 5 2020**, I have sent the above Informative Motion to the Puerto Rico Energy Bureau through its electronic filling tool at <https://radicacion.energia.pr.gov>; and to [secretaria@energia.pr.gov](mailto:secretaria@energia.pr.gov) and [wcordova@energia.pr.gov](mailto:wcordova@energia.pr.gov); the Bureau's Office of Legal Affairs to [legal@energia.pr.gov](mailto:legal@energia.pr.gov) and [sugarte@energia.pr.gov](mailto:sugarte@energia.pr.gov) and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez [n-vazquez@aepr.com](mailto:n-vazquez@aepr.com); Astrid I. Rodríguez Cruz [astrid.rodriguez@prepa.com](mailto:astrid.rodriguez@prepa.com); Katuska Bolaños [kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law) and to Jorge R. Ruíz Pabón [Jorge.ruiz@prepa.com](mailto:Jorge.ruiz@prepa.com). And to: [acarbo@edf.org](mailto:acarbo@edf.org); [javier.ruajovet@sunrun.com](mailto:javier.ruajovet@sunrun.com); [pedrosaade5@gmail.com](mailto:pedrosaade5@gmail.com); [rmurthy@earthjustice.org](mailto:rmurthy@earthjustice.org); [carlos.reyes@ecoelectrica.com](mailto:carlos.reyes@ecoelectrica.com); [cfl@tcmslaw.com](mailto:cfl@tcmslaw.com); [victorluisgonzalez@yahoo.com](mailto:victorluisgonzalez@yahoo.com); [mgrpcorp@gmail.com](mailto:mgrpcorp@gmail.com); [hrivera@oipc.pr.gov](mailto:hrivera@oipc.pr.gov); [jrivera@cnslpr.com](mailto:jrivera@cnslpr.com); [manuelgabrielfernandez@gmail.com](mailto:manuelgabrielfernandez@gmail.com); [acasellas@amgprlaw.com](mailto:acasellas@amgprlaw.com); [corey.brady@weil.com](mailto:corey.brady@weil.com); [paul.demoudt@shell.com](mailto:paul.demoudt@shell.com); [agrartfe@agrartlawpr.com](mailto:agrartfe@agrartlawpr.com); [castrodiappalaw@gmail.com](mailto:castrodiappalaw@gmail.com); [voxpopulix@gmail.com](mailto:voxpopulix@gmail.com); [cfl@mcvpr.com](mailto:cfl@mcvpr.com); [sierra@arctas.com](mailto:sierra@arctas.com); [tonytorres2366@gmail.com](mailto:tonytorres2366@gmail.com); [info@liga.coop](mailto:info@liga.coop); [amaneser2020@gmail.com](mailto:amaneser2020@gmail.com); [escott@ferraiuoli.com](mailto:escott@ferraiuoli.com); [sproctor@huntonak.com](mailto:sproctor@huntonak.com); [mpietrantonio@mpmlawpr.com](mailto:mpietrantonio@mpmlawpr.com); [apagan@mpmlawpr.com](mailto:apagan@mpmlawpr.com); [sboxerman@sidley.com](mailto:sboxerman@sidley.com); [bmundel@sidley.com](mailto:bmundel@sidley.com);

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<sup>1</sup> US Department of Energy 2018 Offshore Wind Technologies and Market Report; Oregon Offshore Wind Site Feasibility and Cost Study, Walter Musial, Philipp Beiter, Jake Nunemaker, Donna Heimiller, Josh Ahmann, and Jason Busch, National Renewable Energy Laboratory, Parametrix, Pacific Ocean Energy Trust; Achievable Renewable Energy Targets for Puerto Rico's Renewable Portfolio Standards during October 2018 – November 2009; <https://www.ndbc.noaa.gov>; <https://www.caricoos.org>

<sup>2</sup> Rodríguez, Carbajal and Romero, *Preliminary Cost Assessment for Offshore Wind Energy in Puerto Rico*, Univ. Turabo de Puerto Rico (2015).

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