

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

NEPR

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IN RE:

INTEGRATED RESOURCE PLAN
FOR THE PUERTO RICO
ELECTRIC POWER AUTHORITY

NO. CEPR-AP-2018-0001

SUBJECT: REQUEST OF ADDITIONAL
INFORMATIO

**MOTION REQUESTING PREPA ADDITIONAL INFORMATION AS AGREED IN
EVIDENTIARY HEARING**

TO: PUERTO RICO ELECTRIC AND POWER AUTHORITY
THROUGH THEIR ATTORNEY OF RECORD ASTRID L. RODRÍGUEZ CRUZ, ESQ.
GENERAL COUNSEL
P.O. BOX 363928
SAN JUAN, PUERTO RICO 00936-3928

The Environmental Defense Fund (“EDF”), by and through the undersigned attorney, hereby serve the following and respectfully submits the following request for production of documents and information on the Puerto Rico Electric Power Authority (“PREPA”) pursuant to Article VIII of the *Regulation on Adjudicative, Notice of Noncompliance, Rate Review and Investigation Proceedings*, Regulation No. 8543 of the Puerto Rico Energy Bureau (“PREB”) and the instructions provided by the PREB on February 5, 2020. Please provide the information **on or before February 14, 2020**.

**REQUESTS FOR ADDITIONAL PRODUCTION OF DOCUMENTS
AND INFORMATION**

1. As discussed in the evidentiary hearing on February 3, 2020, due to discrepancies in information previously provided, we request corrected spreadsheets of PREPA’s reported economic lifetime for the Palo Seco and Yabucoa facilities.

2. Please confirm whether the IRP reflects the loss of capacity payment and take or pay obligations, and whether PREPA considered the impacts to higher rates.

IT IS HEREBY CERTIFIED that the foregoing was sent to the Puerto Rico Energy Bureau through its electronic filing tool at <https://radicacion.energia.pr.gov> and to the Puerto Rico Electric Power Authority to the following: Nitza D. Vázquez Rodríguez (n-vazquez@aepr.com); Astrid I. Rodríguez Cruz (astrid.rodriguez@prepa.com); Jorge R. Ruíz Pabón (jorge.ruiz@prepa.com), Katuska Bolaños (kbolanos@diazvaz.law), and Maralíz Vázquez (mvazquez@diazvaz.law).

IN SAN JUAN, PUERTO RICO, THIS 7th DAY OF FEBRUARY, 2020.

ENVIRONMENTAL DEFENSE FUND

/s/Agustín F. Carbó Lugo
Agustín F. Carbó Lugo
TSPR-RUA No. 13,801
Attorney for Environmental Defense Fund
257 Park Avenue South
New York, New York 10010
Tel. 214-620-7650
Email: acarbo@edf.org

CERTIFICATION OF FILING AND SERVICE

I hereby certify that on February 7, 2020, I have sent the above Motion to the following intervenors: Javier Rúa-Jovet, Sunrun (javier.ruajovet@sunrun.com); Pedro Saadé-Lloréns, Ruth Santiago and Raghu Murthy, Local Environmental Organizations (pedrosaade5@gmail.com, rstgo2@gmail.com and rmurthy@earthjustice.org); Carlos A. Reyes and Carlos E. Colón-Franceschi, EcoEléctrica (carlos.reyes@ecoelectrica.com and ccf@tcmrslaw.com); Roy Torbert, Rocky Mountain Institute (rtorbert@rmi.org); Víctor L. González and Marc G. Roumain-Prieto, Grupo Windmar (victorluisgonzalez@yahoo.com, mgrpcorp@gmail.com); Hannia B. Rivera-Díaz and Jessica Rivera-Pacheco, Oficina Independiente de Protección al Consumidor (hrivera@oipc.pr.gov, jrivera@cnslpr.com); Manuel Fernández-Mejías, Empire Gas Company (manuelgabrielfernandez@gmail.com); Axel E. Colón-Pérez, AES Puerto Rico (axel.colon@aes.com, sboxerman@sidley.com and bmundel@sidley.com); Alexandra Casellas-Cabrera and Corey Brady, National Public Finance Guarantee (acasellas@amgprlaw.com and corey.brady@weil.com); Mariana Ortíz-Colon and Raúl Negrón-Casanovas, Progression Energy (maortiz@lvprlaw.com and rnegron@dnlawpr.com); Paul De Moudt, Shell (paul.demoudt@shell.com); Eugene Scott-Amy, Wartsila North America (escott@ferraiuoli.com and sproctor@huntonak.com); Jéramfel Lozada-Ramírez, ACONER (aconer.pr@gmail.com); Fernando E. Agrait, Non Profit Intervenors (agraitfe@agraitlawpr.com); Pablo Vázquez-Ruíz,

CIAPR (presidente@ciapr.org); Arctas Capital Group (sierra@arctas.com, tonytorres2366@gmail.com); SESA-PR & Caribe GE (cfl@mcvpr.com); League of Cooperatives of Puerto Rico and AMANESER 2025 (info@liga.coop, amaneser2020@gmail.com).

/s/Agustín F. Carbó Lugo
Agustín F. Carbó Lugo
TSPR-RUA No. 13,801
Attorney for Environmental Defense Fund
257 Park Avenue South
New York, New York 10010
Tel. 214-620-7650
Email: acarbo@edf.org