

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

NEPR

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IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY INTEGRATED
RESOURCE PLAN

CASE NO. CEPR-AP-2018-0001

SUBJECT: MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
REQUIRED BY ENERGY BUREAU
ORDER

**Motion From Local Environmental Organizations To Compel PREPA to Produce
Aurora Modeling Files in Compliance With Puerto Rico Energy Bureau Order of
January 29, 2020**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, Local Environmental Organizations,¹ by and through their legal counsel, to respectfully set forth and pray:

1. On January 29, 2020, the Energy Bureau ordered PREPA to “submit the Aurora model files in a readable format for the following runs: S3S2, S4S2 and ESM (base)”, within fifteen days of the notification date of that Resolution and Order (“January 29 Order”).
2. The due date for these Aurora files was February 13th.

¹ Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc. - Enlace Latino de Acción Climática, Comité Yabucoño Pro-Calidad de Vida, Inc., Alianza Comunitaria Ambientalista del Sureste, Inc., Sierra Club and its Puerto Rico chapter, Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., Campamento Contra las Cenizas en Peñuelas, Inc., and CAMBIO Puerto Rico (collectively, “Local Environmental Organizations”).

3. More than fifteen days have elapsed without PREPA releasing the Aurora files subject to the January 29 Order.

WHEREFORE, Local Environmental Organizations request that the Energy Bureau:

- a. Issue an Order compelling PREPA to produce the Aurora modeling files in compliance within five days, and provide an explanation of PREPA's failure to produce the files by the due date.

Respectfully submitted on February 20, 2020,

s/ Pedro Saadé

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CERTIFICATION OF SERVICE

We hereby certify that, on February 20, 2020, we have filed this Motion via the Energy Bureau's online filing system, and sent to the Puerto Rico Energy Bureau Clerk and legal counsel to: secretaria@energia.pr.gov; astrid.rodriguez@prepa.com; jorge.ruiz@prepa.com; n-vazquez@aepr.com; c-aquino@prepa.com and to the following persons:

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Respectfully submitted on this day February 20, 2020

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