

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

~~NEPR~~

Received:

Feb 1, 2020

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IN RE:

**REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN**

CASE NO.:

CEPR-AP-2018-0001

SUBJECT:

Evidentiary Hearing Witnesses

**REQUEST TO INCLUDE DR. MARCELO SAENZ
IN EVIDENTIARY HEARINGS PANELS C, I AND J**

TO THE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority through the undersigned legal representation and respectfully sets forth and pray:

1. The Energy Bureau of the Puerto Rico Service Regulatory Board (the “Energy Bureau”) will hold an Evidentiary Hearing during the week of February 3 to February 7, 2020, to further evaluate the draft Integrated Resource Plan (IRP).
2. On January 17, 2020, the Energy Bureau issued a *Resolution* outlining the Evidentiary Hearing format and guidelines (the “Hearing Guidelines”). As per the Hearing Guidelines, the Evidentiary Hearing areas of examination are divided in panels.
3. On January 29, 2020 the Puerto Rico Power Authority (PREPA) filed a *Request to Include Additional Witnesses for Evidentiary Hearing Panels* (the “Request to Include Witnesses”) in which PREPA argued, among other things, that “all of the panels include PREPA’s expert, Dr. Nelson Bacalao, as witness, the consulting work that Siemens does for PREPA is not made by Dr. Bacalao only. Dr. Bacalao worked side by side with Dr. Marcelo Saenz in the preparation of the draft IRP, preparing model runs and providing responses to the discovery requests.” *See Request,*
- ¶ 4. PREPA moved the Energy Bureau to allow Dr. Saenz to appear as witness for PREPA in

panels A, B, D, E, F and G. Because of a clerical mistake, PREPA did not ask the Energy Bureau to add Dr. Saenz in panels C, I and J.

4. On January 31, 2020, the Energy Bureau issued a *Resolution* (the “Resolution Adding Witnesses”) granting PREPA’s request to include Dr. Marcelo Saenz to the panels listed in the Request to Include Witnesses. Therefore, pursuant to the Hearing Guidelines and the Resolution Adding Witnesses, Dr. Saenz is scheduled to appear as witness in panels A, B, E and not in panels C, I and J.

5. PREPA restates the arguments included in the Request to Include Witnesses and requests the Energy Bureau to allow Dr. Marcelo Saenz to appear as a witness for PREPA in all ten (10) panels.

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to allow Dr. Marcelo Saenz to appear as a witness for PREPA in all ten (10) panels of the Evidentiary Hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of February 2020.

/s Katuska Bolaños
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CERTIFICATE OF SERVICE

It is hereby certified that, on this same date I have filed the above motion using the Energy Bureau's Electronic Filing System, at the following address: <http://radicacion.energia.pr.gov> and that a courtesy copy of the filing was sent via e-mail to: sierra@arctas.com; tonytorres2366@gmail.com; cfl@mcvpr.com; gnr@mcvpr.com; info@liga.coop; amaneser2020@gmail.com; hriviera@oipc.pr.gov; jriviera@cnslpr.com; carlos.reyes@ecoelectrica.com; ccf@tcmrslaw.com; manuelgabrielfernandez@gmail.com; acarbo@edf.org; pedrosaade5@gmail.com; rmurthy@earthjustice.org; rstgo2@gmail.com; larroyo@earthjustice.org; jluebkekmann@earthjustice.org; acasellas@amgprlaw.com; loliver@amgprlaw.com; epo@amgprlaw.com; robert.berezin@weil.com; marcia.goldstein@weil.com; jonathan.polkes@weil.com; gregory.silbert@weil.com; agraitfe@agraitlawpr.com; maortiz@lvprlaw.com; rnegron@dnlawpr.com; castrodierralaw@gmail.com; voxpopulix@gmail.com; paul.demoudt@shell.com; javier.ruajovet@sunrun.com; escott@ferraiuoli.com; SProctor@huntonak.com; GiaCribbs@huntonak.com; mgrpcorp@gmail.com; aconer.pr@gmail.com; axel.colon@aes.com; rtorbert@rmi.org; apagan@mpmlawpr.com; sboxerman@sidley.com; bmundel@sidley.com.

In San Juan, Puerto Rico, this 1st day of February 2020.

s/ Katuska Bolaños
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