

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

~~NEPR~~  
**Received:**  
Mar 20, 2020  
8:03 PM

**IN RE:**

**PUERTO RICO ELECTRIC POWER  
AUTHORITY PERMANENT RATE**

CASE NO.:  
NEPR-MI-2020-0001

SUBJECT:  
Request for Confidential Designation and  
Treatment

**REQUEST FOR CONFIDENTIAL DESIGNATION OF ATTACHMENTS TO  
MOTION IN COMPLIANCE WITH BENCH ORDER AND TO SUBMIT  
REVISED PROPOSED FACTORS AND PRESENTATION**

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:

**I. INTRODUCTION**

Today, March 20, 2020, the Puerto Rico Electric Power Authority (PREPA) filed a *Motion in Compliance with Bench Order and to Submit Revised Proposed Factors and Presentation* (the “Motion in Compliance”).

The Motion to Submit includes several excel spreadsheets attachments. The excel spreadsheets in their native form have (1) formulas, calculations and procedures that are proprietary information of PREPA, that (2) should not be made public in their native form and (iii) are protected under Puerto Rico law.<sup>1</sup> The Motion to Submit also includes a presentation that explains the financial situation of PREPA after the seismic events.<sup>2</sup> The information included in this presentation is part of PREPA’s deliberative process and thus, is privileged. The presentation

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<sup>1</sup> Motion to Submit at exhibits F and G.

<sup>2</sup> *Id.* at exhibit H.

contains information of alternatives that PREPA is still considering and said information is not final.

On March 13, 2020, PREPA filed a motion requesting the Energy Bureau to grant confidential designation to the exhibits attached to the Motion to Submit.<sup>3</sup> The attachments to the Motion in Compliance are revised versions of the attachments to the Motion to Submit.

PREPA herein incorporates and restates the arguments made in the Memorandum for Confidentiality in support to the request for confidential designation and treatment to the exhibits to the Motion to Submit and requests the Energy Bureau to grant confidential designation to the exhibits attached to the Motion in Compliance, which are revised versions of the Motion to Submit's exhibits.

**WHEREFORE**, PREPA respectfully requests the Energy Bureau to grant confidential designation to exhibits F, G and H to the Motion in Compliance.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 20<sup>th</sup> day of March 2020.

/s/ Katuska Bolaños  
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<sup>3</sup> See *Request for Confidential Designation of Attachments to Motion to Submit Reconciliations for the Months of December 2019 to February 2020, Proposed Factors for the Quarter of April to June 2020 and Public Lighting Repair Report* filed on March 13, 2020 (the "Memorandum for Confidentiality").

Exhibit F

Revised proposed factors for the period of April to June 2020

*[The native form of this exhibit has been filed under seal in a Share Point file.]*

Exhibit G

Fuel reports

*[The native form of this exhibit has been filed under seal in a Share Point file.]*

Exhibit H

Revised presentation

*[This exhibit has been filed under seal.]*