

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

~~NEPR~~
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IN RE:

**PUERTO RICO ELECTRIC POWER
AUTHORITY PERMANENT RATE**

CASE NO.:

NEPR-MI-2020-0001

SUBJECT:

Bench Order Entered on March 24, 2020

MOTION TO EXPLAIN EXHIBITS SUBMITTED TODAY

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:

Today, March 25, 2020, the Puerto Rico Electric Power Authority (PREPA) filed three motions to submit several documents (the “March 25 Motions to Submit”)¹ in compliance with several bench orders entered during a Technical Conference held yesterday.

The March 25 Motions to Submit include several which are further explained herein:

a. **Exhibit I** – Original September 2019 Fuel Report

This folder includes one Excel workbook.² The excel workbook is the original version of the Excel workbook previously submitted as Exhibit F³.

As explained in the March 19 Motion⁴, certain amounts included in February 2020 fuel report are amount that pertain to the month of September 2019. The Aguirre Power Plant had reported a consumption of 344,996.28 BBIs (\$32,783,190.73) for

¹ Motion to Submit, Second Motion to Submit and Third and Final Motion to Submit filed on March 25, 2020.

² REPORTE DE COMBUSTIBLE - Asset Suite - Sept 2019.xls

³ See *Motion in Partial Compliance with Bench Order and Request for Extension of Time* filed on March 19, 2020 (the “March 19 Motion”).

⁴ *Motion in Partial Compliance with Bench Order and Request for Extension of Time* filed on March 19, 2020.

the month of September 2019, while the amount entered in Asset Suite was 171,062.65 BBls (\$16,257,211.26). The latter is the correct amount. The correct action should have been entering the difference of 73,933.63 BBls (\$16,525,979.47), but the only amount entered in the General Ledger was \$174,026.64. Therefore, there was a difference of \$16,351,950.83. The analysis and corrections were made and entered in February 2020. The following chart summarizes the information herein provided:

	BBls	\$\$\$
Consumption Report per plant	(344,996.28)	(32,783,190.73)
Asset Suite	(171,062.65)	(16,257,211.26)
Total to be posted in GL	(173,933.63)	(16,525,979.47)
Journal Entry Sept 2019		-174,028.64
Diff not posted in Sept 2019, but posted in Feb 2020		(16,351,950.83)

b. **Exhibit J** – Revised Consumption, Generation and Dmax Estimates Report

This folder includes one Excel workbook.⁵ The excel workbook is the same consumption, generation and dmax estimate report previously submitted (Exhibit B⁶) but including the supporting raw data.

c. **Exhibit K** – Second Revised Proposed Factors and **Exhibit L** – Second Revised Supporting Documents

The documents included in these folders are revised versions of the documents included with exhibits F and G. The amount that PREPA requests the Energy

⁵ REPORTE DE COMBUSTIBLE - Asset Suite - Sept 2019.xls

⁶ Estimado de consumo generación y dmax trimestre de abril mayo y junio (REV11feb2020).xls

Bureau to defer changed and therefore, the proposed factors have been revised. The files that show the incremental costs are those identified as Incremental Cost Analysis, January 2020 and February 2020, respectively. These files are linked to the Official January and February 2020 Gen file, which is the data provided by the Generation Directorate. The report on the barrels consumed and their costs for the period of January and February 2020 is included in the Barrel Consumed Cost (Jan and Feb 2020) with the data provided by the Finance Directorate, which is exported from the Reporte de Combustible – Asset Suite, jan2020 and feb2020, respectively. As it is shown in these supporting data files, the incremental cost has been modified. The original approach had been to consider the units that burn fuel no. 2 and 6. However, PREPA is requesting FEMA to reimburse only the fuel used by the peakers, which is no. 2. The following is a summary of the deferral amounts to be deferred and the revisions.

	January 2020	February 2020
Original Submittal	\$47,173,951.76	\$37,088,581.65
Revised (3/25) Submittal	\$34,177,068.87	\$29,869,689.74

The proposed factors have been revised to reflect a deferral total amount of \$64,046,758.61, which increase the original fuel factor from \$0.096211 by kWh to \$0.101264 by kWh.

d. **Exhibit M** – Second Revised Presentation

The Second Revised Presentation supersedes Exhibit H and reflects changes pursuant to the revisions explained in subpart (e).

WHEREFORE, PREPA respectfully requests the Energy Bureau to determine that PREPA has complied with the bench orders issued during the March 24, 2020 Technical Conference.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of March 2020.

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