

**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:
Request for Confidential Designation and
Treatment

**REQUEST FOR CONFIDENTIAL DESIGNATION OF
ATTACHMENTS TO SEVERAL MOTIONS FILED 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:

I. INTRODUCTION

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

The March 25 Motions to Submit include several Excel spreadsheets in native form as attachments thereto. 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.² The March 25 Motions to Submit also include a presentation that explains the financial situation of PREPA after the seismic events.³ The information included in this presentation is part of PREPA’s deliberative process and thus,

¹ Motion to Submit, Second Motion to Submit and Third and Final Motion to Submit filed on March 25, 2020 at exhibits I, J, K and L.

² Motions to Submit at exhibits I, J, K and L.

³ Third and Final Motion to Submit at Exhibit M.

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

The attachments to the March 25 Motions to Submit are revised versions of the documents that have been previously submitted to the Energy Bureau⁴ and PREPA has already requested to determine that these are confidential and therefore, will receive confidential treatment.

PREPA herein incorporates and restates the arguments made in the memorandums for confidentiality in support to the request for confidential designation and treatment to the exhibits to the Prior Motions to Submit⁵ and requests the Energy Bureau to grant confidential designation to the exhibits attached to the March 25 Motions to Submit, which are revised versions of the Prior Motion to Submit exhibits.

WHEREFORE, PREPA respectfully requests the Energy Bureau to grant confidential designation to exhibits I, J, K, L and M to the March 25 Motions to Submit.

RESPECTFULLY SUBMITTED.

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

/s/ Katiuska Bolaños
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⁴ See *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* at exhibits A, B, C and D filed on March 13, 2020; see also *Motion in Partial Compliance with Bench Order and Request for Extension of Time* filed on March 19, 2020 at Exhibit E; and see also *Motion in Compliance with Bench Order and to Submit Revised Proposed Factors and Presentation* filed on March 20, 2020 at exhibits F, G and H. Together these motions are herein referred to as the “Prior Motions to Submit”).

⁵ 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; see also *Request for Confidential Designation of Attachments to Motion in Compliance with Bench Order and to Submit Revised Proposed Factors and Presentation* dated March 20, 2020.

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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.]