

NEPR

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

IN RE:

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

CASE NO.: CEPR-AP-2018-0001

SUBJECT:
DISCOVERY

**MOTION IN PARTIAL COMPLIANCE WITH APRIL 28, 2020
RESOLUTION AND ORDER**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On April 28, 2020, the Energy Bureau Puerto Rico of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) issued a *Resolution and Order* ruling on the Puerto Rico Electric Power Authority (PREPA)’s *Motion to Quash Local Environmental Organizations Disallowed Discovery Extension* and the *Local Environmental Organization’s Response to PREPA’s Motion to Quash* (the “April 28 Order”). In the April 28 Order, the Energy Bureau directed PREPA to provide responses to two of several requirements of information served by the Local Environmental Organizations after the Evidentiary Hearings. These requests are:

- a. Please provide the current, updated figure on the percentage of non-technical losses.

b. Please provide the cost of preliminary permitting and engineering for each of the Yabucoa and Mayaguez Ship-Based LNG Terminal and 302 MW F-Class CCGT.¹

2. The response regarding the non-technical losses has been provided by Efran Paredes Maisonet, Director of Planning and Environmental Protection, in an excel chart providing the Fiscal Year of 2020 until March 2020. *See Exhibit A.*²

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to note the above-mentioned.

RESPECTFULLY SUBMITTED.

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

/s/ Katuska Bolaños
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¹ See April 28 Order at ¶¶ 1 and 3; see also *Request for Information to Puerto Rico Electric Power Authority from Local Environmental Organization, In Accordance with the Bureau's Order* dated February 10, 2020 at ¶¶ 1 and 3(a).

² Response to Item no. 1b will be provided in a separate motion.

Exhibit A

energía pérdida y sus costos-FY 2020 a marzo.xlsx³

³ Due to software limitations, the chart is attached in *.pdf* format but will be served on all parties in *.xls* format.

Energía - Año Fiscal 2020, acumulación doce meses a marzo 2020

Año Fiscal	Generación mkWh		Por ciento de Pérdidas			millones de kWh Perdidos			Pérdida Ingreso Básico (M\$)			Costo Tarifa Provisional (Pérdidas 12 meses)			Recobra a través de Cláusulas (M\$)			Costo al Ingreso Total (M\$)		
	Bruta	Neta	Técnicas	No Técnicas	Total	Técnicas	No Técnicas	Total	Técnicas	No Técnicas	Total	Técnicas	No Técnicas	Total	Técnicas	No Técnicas	Total	Técnicas	No Técnicas	Total
2002	22,562.4	21,485.7	8.01	3.03	11.05	1,721.8	651.4	2,373.1	92.7	49.9	142.6				80.8	43.5	131.6	194.1	74.2	268.3
2003	23,717.2	22,641.4	8.05	4.04	12.09	1,821.9	915.7	2,737.6	95.4	67.5	162.9				105.9	75.0	184.1	226.1	114.8	340.8
2004	24,100.1	23,015.1	8.03	3.31	11.33	1,847.2	760.9	2,608.1	97.3	56.9	154.2				112.9	66.0	182.7	232.9	97.0	329.9
2005	24,500.2	23,378.3	8.01	3.73	11.74	1,872.0	872.7	2,744.7	98.3	64.9	163.2				145.4	96.1	242.0	270.1	127.3	397.4
2006	24,870.0	23,753.9	7.91	4.54	12.45	1,878.9	1,079.2	2,958.1	97.0	78.9	175.9				195.0	158.6	354.1	330.1	191.9	522.0
2007	25,082.2	24,062.4	8.04	5.95	13.99	1,933.6	1,432.7	3,366.3	99.2	102.9	202.2				192.8	199.9	400.9	340.3	255.0	595.2
2008	23,935.2	23,014.7	8.06	5.88	13.93	1,854.0	1,352.5	3,206.6	95.9	93.0	188.9				253.7	245.9	483.6	390.7	272.4	663.1
2009	22,650.9	21,763.2	8.10	6.27	14.37	1,763.6	1,363.6	3,127.2	91.5	99.2	190.7				230.4	249.7	478.8	369.7	289.0	658.7
2010	23,579.5	22,561.6	8.22	6.45	14.67	1,854.5	1,455.1	3,309.5	86.8	94.9	181.6				221.2	241.9	506.9	389.3	308.7	698.0
2011	22,627.6	21,636.4	8.19	5.85	14.04	1,773.0	1,266.1	3,039.0	100.4	100.9	201.3				282.2	283.6	529.8	409.9	295.8	705.7
2012	22,191.5	21,203.6	8.19	6.29	14.48	1,736.9	1,333.3	3,070.2	89.8	96.5	186.3				311.8	334.8	671.6	481.2	373.0	854.2
2013	21,954.8	21,009.0	8.21	4.73	12.94	1,722.5	992.3	2,714.7	92.9	75.8	168.7				305.5	249.1	568.3	463.9	269.9	733.8
2014	21,362.7	20,508.2	8.23	6.35	14.58	1,687.6	1,302.1	2,989.7	93.9	101.5	195.4				274.3	296.6	588.7	433.2	337.8	771.0
2015	20,903.9	20,107.3	8.21	5.97	14.18	1,649.8	1,200.4	2,850.2	92.0	93.9	185.9				247.2	252.2	509.0	393.2	289.2	682.4
2016	20,900.1	20,113.2	8.23	5.70	13.93	1,655.8	1,146.2	2,802.0	94.7	92.0	186.7				167.8	163.0	340.3	299.0	209.6	508.6
2017	20,199.9	19,448.9	8.22	3.80	12.03	1,599.3	739.7	2,339.0	92.5	60.7	153.2	18.0	11.8	29.9	161.8	106.1	267.9	272.3	178.6	450.9
2018	14,657.0	14,039.3	8.03	1.24	9.27	1,127.7	173.5	1,301.2	72.2	16.3	88.6	13.5	3.0	16.5	143.5	32.5	176.0	229.2	51.9	281.1
2019	18,430.6	17,753.0	8.18	2.55	10.73	1,451.5	452.2	1,903.8	86.1	38.5	124.6	16.8	7.5	24.2	178.1	79.5	257.6	280.9	125.5	406.4
2020	18,804.9	18,145.1	8.25	3.72	11.97	1,496.6	675.7	2,172.3	93.2	59.6	152.9	16.5	(6.5)	10.1	176.6	130.3	306.9	286.4	183.5	469.9

Notas:

Las pérdidas no técnicas incluyen el uso indebido y errores de medición, no todos los costos se deben al uso indebido.

Los datos se obtienen de la base de datos para el cálculo de las eficiencias que se utilizan en los ajustes de combustible y compra de energía facturados por la AEE.

Para el cálculo de las mismas utilizamos la generación bruta y neta oficial, el consumo por nivel de voltaje y el uso de energía de la AEE acumulado a doce meses.

Las pérdidas se distribuyen por nivel de voltaje y se clasifican en técnicas y no técnicas.

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; jluebkmann@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; castrodieppalaw@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 May 2020.

s/ Katuska Bolaños
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