

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

<b>NEPR</b>  <b>Received:</b>  <b>May 1, 2020</b>  <b>5:16 PM</b>
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**IN RE:**

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

CASE NO.: CEPR-AP-2018-0001

SUBJECT:  
DISCOVERY

**SUPPLEMENTAL RESPONSE IN 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. The Energy Bureau’s April 28 Order directed PREPA to provide responses to two of several requirements of information served by the Local Environmental Organizations (LEO) after the Evidentiary Hearings.

2. Earlier today, PREPA filed a *Motion in Partial Compliance with April 28, 2020 Resolution and Order* (“Motion in Partial Compliance”)<sup>1</sup> providing a response to one of the two requests for information that the Energy Bureau ordered PREPA to respond.<sup>2</sup>

3. The pending response was to the April 28 Order item no. 3, which directed PREPA to 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.<sup>3</sup>

4. The response to the requirement of information regarding the cost of preliminary permitting and engineering for each of the Yabucoa and Mayaguez Ship-Based LNG Terminal and

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<sup>1</sup> Capitalized terms not defined herein shall be ascribed the same meaning provided to them in the *Motion in Partial Compliance*.

<sup>2</sup> Today PREPA also filed an *Unopposed Request for Brief Extension of Time to Comply with April 28, 2020 Resolution and Order* requesting until 6:00pm to comply with the submittal of the response to the second question.

<sup>3</sup> See April 28 Order at ¶ 3.

302 MW F-Class CCGT has been provided by Sargent and Lundy Consulting, expert consultant to PREPA's Project Management Office, and approved by Efran Paredes Maisonet, Director of Planning and Environmental Protection.

*Response:* The estimated cost for the preliminary permitting and Front-End Engineering Design (FEED) for each of the Yabucoa and Mayagüez Ship-Based LNG Terminal and 302 MW F-Class CCGT is estimated between \$6.5 to \$7.5M (per site). This estimate is provided under the assumption that either one site or the other will be done. However, if both sites' permitting and FEED are done, then some savings may be realized. Note that this estimate is for engineering hours; as such, there is not a significant difference between the two sites. However, the project costs of each site are expected to differ.

**WHEREFORE**, it is respectfully requested that the Energy Bureau notes PREPA's compliance with the April 28 Order.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, this 1<sup>st</sup> day of May 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; jrivera@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; 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](mailto:sboxerman@sidley.com); [bmundel@sidley.com](mailto:bmundel@sidley.com).

In San Juan, Puerto Rico, this 1<sup>st</sup> day of May 2020.

s/ Katuska Bolaños  
Katuska Bolaños