

**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

**UNOPPOSED REQUEST FOR BRIEF EXTENSION OF TIME TO COMPLY
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 issued the April 28 Order. In the 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. The deadline to respond to these requests is today at noon.

2. A few minutes ago, PREPA filed a *Motion in Partial Compliance with April 28, 2020 Resolution and Order* (“Motion in Partial Compliance”)¹. The Motion in Partial Compliance provides a response to one of the two requests for information that the Energy Bureau ordered PREPA to respond. However, after due diligence, PREPA has not been able to gather the necessary information to respond to one of the requests. This is the only pending request.

3. The short three-day period to respond to the April 28 Order has not been sufficient for PREPA to identify the information necessary to respond to the April 28 Order item no. 3

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

regarding the CCGTs. The April 28 Order was notified at 5:50 pm. The next day, April 29, 2020, PREPA officers had to attend to the monthly Governing Board meeting and also, prepare for the three (3) hours hearing that was held yesterday under case NEPR-AP-2020-0001. These previously scheduled commitments did not afford PREPA sufficient time to identify the totality of the information requested in the April 28 Order.

4. Therefore, PREPA requests a brief extension until today at 6:00 pm to comply with the above mentioned the April 28 Order item no. 3.

5. PREPA met and confer with LEO and they expressed that they do not oppose to the request for extension made herein.

WHEREFORE, the Puerto Rico Electric Power Authority requests the Energy Bureau to grant a brief extension to submit the pending response until today at 6:00pm.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st 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; 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; 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; castrodiappalaw@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
Katuska Bolaños