

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

NEPR

Received:

May 29, 2020

9:53 AM

IN RE: REVIEW OF THE PUERTO RICO ELECTRICAL POWER AUTHORITY INTEGRATED RESOURCE PLAN	CASE NO.: CEPR-AP-2018-0001 SUBJECT: MOTION TO STRIKE NOT FOR PROFIT INTERVENORS AMENED MOTION TO SUBMIT REPLY BRIEF.
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**OPPOSITION TO MOTION TO STRIKE NOT FOR PROFIT INTERVENORS
AMENDED MOTION TO SUBMIT REPLY TO FINAL BRIEF**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW ICSE AND THE NOT FOR PROFIT INTERVENORS through the undersigned legal representation and respectfully sets forth and pray:

1. On May 27, 2020, Instituto de Competitividad y Sostenibilidad Económica de Puerto Rico, Centro Unido de Detallistas, Cámara de Mercado, Industria y Distribución de Alimentos, Puerto Rico Manufactures Association and Unidos por Utuado (the “Not for Profit Intervenors”) filed with the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) an Amended Motion to Submit Reply to Final Briefs (the “Amended Motion”).

2. The Amended Motion was to correct the summary on pag. 7 of the Motion to Submit Reply to Final Briefs filed on May 26, 2020.¹

3. PREPA has moved the Energy Bureau to strike the Amended Motion from the record. Pursuant to the Energy Bureau’s Resolution and Order entered on April 15,

¹ See, PREPA Motion to Strike Not for Profit Intervenors Reply to Final Briefs filed on May 27, 2020.

2020, the deadlines for all parties to submit the reply to final briefs elapse on April 20, 2020 at 5:00pm².

4. PREB approved an extension of all terms pending before it. The extension provided by PREB until May 25th 2020 covers all terms pending at PREB.

5. The order cited by PREPA was not exempted from PREB's order postponing all terms until May 26th 2020, extended to May 27th, 2020 due to Monday 26th, 2020 been a holiday.

WHEREFORE, The ICSE and not profit intervenors requests the Honorable Puerto Rico Energy Bureau to accept the Amended Motion in the record of the case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 28th day of May 2020.

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; hrivera@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; jliebkmann@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; voxpoplux@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; rtirbert@rmi.org; apagan@mpmlawpr.com; sboxerman@sidlev.com; bmundel@sidlev.com

² See, CEPR-AP-2018-001 April 15 2020 Resolution and Order pag. 2

In San Juan, Puerto Rico this 28th day of May 2020.

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