

**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 Extension of Time

**REQUEST FOR EXTENSION OF TIME TO FILE
RECONCILIATIONS AND PROPOSED FACTORS**

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:

In the regular course of business, and as established by the Energy Bureau¹ in several orders, the Authority must file the reconciliation of the riders and proposed factors to be implemented in each billing cycle on a quarterly basis. Last month, in compliance with an order entered by the Energy Bureau, the Authority filed the March and April 2020 reconciliations of the fuel consumption and power purchase adjustment clauses before the closing of the quarter in course.² The March and April 2020 reconciliations are part of the last quarter on the current fiscal year. The last quarter also includes May 2020. Therefore, in order to complete the reconciliation of the last quarter of the current fiscal year, the Authority has to file the May 2020 reconciliation and proposed factors. Pursuant to several orders of the Energy Bureau, the deadline to submit the

¹ Capitalized terms used herein shall be ascribed the same meaning provided in the *Motion to Inform Unforeseen Interruption in the May 2020 Reconciliation Process* filed by the Authority on June 8, 2020.

² Resolution and Order entered on April 23, 2020 (the “April 23 Order”) at page 3 (The Energy Bureau determined that “it is prudent to closely monitor PREPA's fuel costs and consumption” and ordered PREPA “to submit monthly reconciliations of fuel and purchased power costs.” Emphasis provided.).

latter is this next Friday, June 12, 2020 at noon. However, the Authority finds that there is cause for an extension of time to comply with the deadline of this submittal.

As the Energy Bureau is aware, the vast majority of the Authority's officers, in particular the ones tasked with completing the reconciliations and proposed factors, are working remotely. The logistics associated with appropriate implementation of remote working for governmental employees which, among other things, requires access to the Authority's system has been a challenge that has resulted in complications for the finalization of the computations and reconciliations in the time allotted to do so. This issue, together with the Oracle E-Business Suite software unavailability for a span of two business days, has cause several delays in the reconciliation process.³ At the time this motion is being filed, the finance and planning directorates are behind their current schedule to complete the tasks. Accordingly, the Authority foresees that the reconciliation and proposed factors will not be completed on time to be filed tomorrow before noon. The Authority understands that an extension of time of three additional days is reasonable and sufficient to complete the work. Therefore, the Authority requests the Energy Bureau an extension of time until June 17, 2020 at noon to file the May 2020 reconciliation and the July to September 2020 proposed riders' factors.

Additionally, the Authority anticipates it will not be able to comply with the July 2020 deadline. Pursuant to the April 23, 2020 Order, and until the Energy Bureau orders otherwise, the Authority must submit the reconciliations and proposed factors the second Friday of each coming month. This change allows the Energy Bureau to monitor the effects of the variation in oil prices, its effect on the reconciliations and to determine if the Advanced Adjustment Clause must be

³ The unavailability of the Oracle E-Business Suite was informed by the Authority to the Energy Bureau on June 8, 2020.

implemented. Therefore, in compliance with said order, the Authority must submit the reconciliation for the month of June 2020 on July 10, 2020. The second Friday of July is July 10th. This means that, on July, the Authority will have only eight (8) days to work on the reconciliation. Eight (8) business days are not enough to complete the above-mentioned reconciliations. Thus, the Authority understands that an extension of time until July 15, 2020 at noon is reasonable and sufficient to complete the June 2020 reconciliation and proposed riders' factors. The Authority requests the Energy Bureau to grant said extension.

WHEREFORE, the Authority respectfully requests the Energy Bureau to (a) grant until June 17th at noon to file the May 2020 reconciliation and proposed factors and to (b) grant until July 15th at noon to file the June 2020 reconciliation and proposed factors.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11th day of June 2020.

/s/ Katuska Bolaños
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