

NEPR

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

IN RE:

**THE PERFORMANCE OF THE PUERTO
RICO ELECTRIC POWER AUTHORITY**

CIVIL NO.: NEPR-MI-2019-0007

SUBJECT:
PREPA's Performance Reporting
Requirements

MOTION TO SUBMIT INFORMATION IN COMPLIANCE WITH 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 prays as follows:

1. In the abovementioned case, on August 13, 2020, the Puerto Rico Energy Bureau (the "Energy Bureau") issued a Resolution and Order (the "Order").

2. In the Order, the Energy Bureau ordered the Puerto Rico Electric Power Authority (PREPA) to submit additional information related to a previous order issued on June 30, 2020, on or before August 20, 2020 at 12:00 pm.

3. In compliance with the Order, PREPA includes the following information produced by its authorized officials:

I. The following information was submitted by Joseline N. Estrada Rivera, Manager, Forecasting and Statistics Department:

A. Renewable Energy and Demand Side Management

1. Provide missing monthly information for Total Installed Distributed Generation by type (system and per district)

Provide missing monthly information for Incremental Installed Distributed Generation by type (system and per district).

PREPA includes the requested information, however, we must emphasize, as it was informed in the technical conference held on August 11, 2020, that PREPA is making efforts so that the reliability and accuracy of this data be improved. See attached Excel files PREPA_PIMS-MAR 20 MAY 2020, PREPA_PIMS-DEC19_FEB 2020, PREPA_PIMS-SEP_NOV 2019, DG's data.

2. Provide missing monthly information for Incremental Number of Distributed Generation Installations by Type (system by district).

PREPA includes the requested information, however, we must emphasize, as it was informed in the technical conference held on August 11, 2020, that PREPA is making efforts so that the reliability and accuracy of this data be improved. See attached Excel files PREPA_PIMS-MAR 20 MAY 2020, PREPA_PIMS-DEC19_FEB 2020, PREPA_PIMS-SEP_NOV 2019, DG's data.

3. Confirm that PREPA's reported energy savings for government energy efficiency programs are annual savings.

According to Act 57-2014, the savings must be in a fiscal year basis, each one compared with base year 2013. However, after Fiscal Year 2018, the savings are by the hurricanes, earthquakes and the COVID 19 Pandemic. This reduction is more directly related to those specific events than the efficiency measures.

4. Confirm and restate, if necessary, PREPA's annual savings governmental energy efficiency programs are reports as positive values.

Yes, The excel files included with this Motion, titled "Gov Efficiency Performance According Act 57 FY 2015-2019" and "Disminución de consumo por año establecido Ley 57 Gobierno por Agencia" shows the data in negative values but in the final template, PREPA reported it in positive values.

5. Confirm and correct, if required, that PREPA's estimate for the Central Governmental Agencies' energy efficiency programs are based on FY 2020 savings instead of FY

2019 savings targets as shown in the supporting workbook.

No, the estimate for the Central Governmental Agencies' energy efficiency programs are from Fiscal Year 2019 because according Act-57-2014, the savings are determined at the end of each fiscal year compared with FY 2013 as a base. The report was from the period ending in May, at that time, Fiscal Year 2020 had not ended. The next report to be filed on September 2020, must report Fiscal Year 2020.

6. Confirm and correct, if required, that PREPA's estimate for the Public Corporations' energy efficiency programs are based on FY 2020 savings instead of FY 2019 savings targets as shown in the supporting workbook.

No, PREPA's estimate for the Public Corporations' energy efficiency programs are from Fiscal Year 2019, because according to Act 57-2014, the savings are determined at the end of each fiscal year compared with Fiscal Year 2013 as a base. The report was from the period ending in May 2020, and at that time Fiscal Year 2020 had not ended. The next report to be filed on September 2020, must include the Fiscal Year 2020.

7. Provide source documentation and supporting calculations for PREPA's estimate of 8.04 GWh reported by Municipalities.

See Excel File *CELI FY 2019*.

II. The following information was submitted by Eng. Humberto Campán Colón, Administrator, Transmission and Distribution Directorate:

B. Transmission and Distribution

1. Provide documentation for the calculation methodology, including if there are exclusions for major events, for PREPA's reported system average interruption duration index ("SAIDI") and the system interruption frequency index ("SAIFI").

See Excel Files: IEE 1366.pdf, SAIDI SAFI, CAIDI.pdf, "Índices de Confiabilidad SAIDI Adopción 1366".

2. Provide an explanation as to why PREPA has not reported momentary average interruption frequency index ("MAIFI") statistic as required.

At the present PREPA does not compile the requested data related to this index. It is possible to provide it, however, PREPA will have to coordinate with areas such as: Corporate Strategy and Information Technology Office and Transmission and Distribution Directorate. Nevertheless, this

evaluation process will take approximately until December, 2020; if no atypical event affects the electrical system during that period.

3. Confirm that monthly SAIDI values are reported in minutes.

Yes, the monthly SAIDI values are reported in minutes.

- III. The following information was submitted by Eng. Luisette X. Rios Castañer, Division Head, Environmental Protection and Quality Assurance Division:

C. Planning and Environmental

1. Restate emissions of SO₂, NO₂, PM, Hg and other regulated pollutants (system) to be distinguished by pollutant, not aggregated as currently reported and provide monthly pollutant emissions by pollutant for that last four reporting periods with supporting calculations and measurements.

See Files identified with letter C. Planning and Environmental.

- IV. The following information was submitted by Mr. Neftalí Gonzalez Cruz, Division Head, Procurement Division:

1. Provide the source of documentation and supporting calculations with formulae intact for PREPA's percentage for

Warehouse General Depot (Distribution Center), Warehouse
T&D (Region and district) and Warehouse Plants.

See Files identified with letter D. Operations Warehouse.

WHEREFORE, PREPA requests this Honorable Energy Bureau to note the filing
of the attached documents in compliance with the August 13, 2020, Resolution and Order.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, August 20, 2020.

/s Marisol Pomales Morales
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Exhibit A

https://diazvaz-my.sharepoint.com/:f/g/personal/kbolanos_diazvaz_law/EuoAptuerNxFoWK0HmfptlcBDJ1nQYVOeKI3kJAaXhOEzg?e=rLWdD6