

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

~~NEPR~~

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**IN RE: THE UNBUNDLING OF THE
ASSETS OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY**

CASE NO.: NEPR-AP-2018-0004

SUBJECT:

Motion in Compliance; Requirement for
Information and Production of Documents.

**MOTION IN COMPLIANCE WITH REQUEST FOR INFORMATION
AND PRODUCTION OF DOCUMENTS**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

On September 4, 2020, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) issued an Order¹ noting the importance of the need to develop an updated cost of service study (COSS) to implement electric energy wheeling in accordance with Regulation 9138², pursuant to Act 57-2014³ and Act 17-2019⁴. For this purpose, the Energy Bureau requires the Puerto Rico Electric Power Authority (PREPA) to unbundle its rates and allocate costs by function, customer class, non-by passable charges and stranded costs, if any. In the Order, the Energy Bureau directed PREPA to file comments in response to the Order’s Appendix B⁵ and Appendix C⁶.

After reviewing and analyzing the requests set forth by the Energy Bureau in Appendix B and C, PREPA designated a multidisciplinary team to respond the requirements. The team includes officials from PREPA’s Finance, Customer Service, Planning, Generation, and Transmission &

¹ Order September 4, 2020 (“the Order”).

² Regulation 9138, *Regulation on Electric Energy Wheeling* approved on December 11 2019.

³ Act no.57 of May 27, 2014 as amended, known as *The Puerto Rico Energy Transformation and RELIEF* (“Act 57-2014”).

⁴ Act. No. 17 of April 11, 2019, as amended, known as *The Puerto Rico Energy Public Policy Act* (“Act 17-2019”).

⁵ Appendix B Questions for Stakeholders of the Order

⁶ Appendix C Information Requests for PREPA (RFI) of the Order.

Distribution divisions. PREPA has provided responses to information requests in Appendix B. Exhibit A. In regards to Appendix C, the requests for information were distributed by item corresponding to the information request number. Exhibit B.

PREPA provides below an illustrative table specifying the requirement of information and the corresponding response or production.

Requirement of Information	Response
1. Please provide (in spreadsheet form) separately each cost account and sub recorded on PREPA's books for Fiscal Years 2018-2019 and 2019-2020, using FERC accounts or PREPA's cost accounts at a similar level of detail.	Finance Division will provide response.
2. Please provide (in spreadsheet form) for Fiscal Years 2018-2019 and 2019-2020, the relevant cost information for PREPA's generation units at the most granular level of detail available: a.Plant in Service b.Non-fuel fixed operations and maintenance expense c.Variable operations and maintenance expense d.Book life for each unit e.Monthly availability data, including forced outage hours, planned outage hours, maintenance outage hours, and derating hours.	Finance Division will provide response.
3. Please provide in spreadsheet form, for Fiscal Years 2018-2019 and 2019-2020, sales (kWh) and revenue by tariff at the annual level as well as the monthly level.	See Item 3
4. Please provide in spreadsheet form PREPA's hourly load for each hour from July 1, 2019 to June 30, 2020.	See Item 4
5. Please provide in spreadsheet form any customer outages since July 1, 2019 due to inadequacy of generation resources, and the date, duration, and lost load (MW and MWh) for each such outage.	See Item 5

<p>6. Please provide updated data on PREPA's distribution substations for FY 2018-2019 and 2019-2020, including a list of substations where technical characteristics have changed in the last year (e.g., capacity or voltage on either side).</p>	<p>See Item 6</p>
<p>7. Please provide PREPA's estimate of the dollar value of each subsidy in FY 2018-2019 and 2019-2020.</p>	<p>See Item 7</p>
<p>8. Please provide PREPA's estimate for FY 2018-2019 and 2019-2020 for each rate class for the amount of each statutory subsidy that flows to customers on that rate (e.g., the distribution of the residential fuel subsidy and the life-preserving equipment discount across residential tariffs, the distribution of the hotel discounts across commercial tariffs).</p>	<p>See Item 8</p>
<p>9. Please provide the following information by municipality for FY 2018-2019:</p> <p>CILT dollars. CILT MWh. Sales to customers in the municipality, by tariff.</p>	<p>See Item 9</p>
<p>10. Please provide, to the extent available, the cost of the transmission lead line for each generation unit, along with the voltage of that line and its length. If such information is not currently available, please describe the level of effort that would be necessary to ascertain and provide such information</p>	<p>Finance Department will provide response.</p>
<p>11. Does PREPA currently maintain data on the usage of individual transmission lines or segments of transmission lines? If so, please describe such data.</p>	<p>The transmission operators of the Energy Control Centers constantly report in three applications the following data related to the transmission lines or their segments:</p>

	<ul style="list-style-type: none"> a. Transmission Line Interruptions Report - includes lines or segments out of service, period of time and reason. b. Messages (Teletypes) - includes transmission switch operations, time period, protection activated and reason. c. Unhooking - includes transmission lines or segments with work orders to perform uncoupling work (vegetation), day and status.
<p>12. To the extent that such data is not already tracked and available, please describe the level of effort and cost that would be entailed in beginning to track all generation costs by unit</p>	<p>Please refer to 11</p>
<p>13. Is PREPA currently doing load sampling by customer class? If so, please provide all available load sampling data for the last three fiscal years. If not, describe the level of effort and cost that would be necessary to begin load sampling for each customer class by January 2021.</p>	<p>Planning Division will provide response</p>
<p>14. Has PREPA analyzed metering costs by customer class in the last decade? If so, provide such analysis. If not, describe the level of effort and cost that would be entailed in either (1) analyzing a sample of customers from each customer class or (2) starting to comprehensively collect metering cost data.</p>	<p>Customer Service Division will provide response</p>
<p>15. Does PREPA track metering types and technologies, either for customer classes or in the aggregate? If so, please provide the available data. If not, please describe the level of effort and cost that would be entailed by beginning to track metering types and technologies.</p>	<p>See Item 15</p>
<p>16. Please describe the level of effort and cost that would be entailed in sampling each</p>	<p>Please refer to Item 15</p>

customer class to estimate service line costs.	
17. Please describe the current extent to which distribution lines and equipment are tracked separately based on primary versus secondary voltage. If such distinctions are not currently tracked, please describe the level of effort and cost that would be entailed in (1).	Finance and Transmission and Distribution Divisions will provide response.
18. Please describe the extent of the data that is currently tracked for individual line transformers. For line transformers that serve a single customer, is that counted and tracked by customer class? For line transformers that are shared, are to customers and customer classes counted and tracked? If not, please describe the level of effort and cost to begin to track such data.	See Item 18

PREPA officials have been diligently working in preparing the responses and supporting documents to the Energy Bureau's requirements of information. However, PREPA will not be able to submit the all responses in this present filing. Therefore, PREPA moves the Energy Bureau to allow a supplemental motion to provide responses to the six (6) outstanding requirements for information.

WHEREFORE, PREPA respectfully requests the Energy Bureau to note the compliance with the Order and grant a brief extension of time until Friday, October 2, 2020, to file a supplemental motion with responses to outstanding Appendix C requirements of information.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of September, 2020.

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Exhibit A

Responses to Appendix B

https://diazvaz-my.sharepoint.com/:f:/g/personal/kbolanos_diazvaz_law/EuIx0f30-2ZKuxTKGkHdCwIBkp2eQm4bD4cEk1ihOxqXGg?e=1mjPe8

Exhibit B

Responses to Appendix C

https://diazvaz-my.sharepoint.com/:f/g/personal/kbolanos_diazvaz_law/EgoN4kgZbHBGqG12Ku3tUBsBAzBe8c9rHBr7z6FAhdYq_A?e=jBOSgV