

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

~~NEPR~~

Received:

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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; Requirements for
Information and Production of Documents.

MOTION TO SUBMIT DOCUMENTS

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

On September 25, 2020, the Puerto Rico Electric Power Authority (PREPA) submitted to the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) a *Motion in Compliance with Request for Information and Production of Documents*¹ in response to the September 4, 2020 Order.² In the Motion in Compliance, PREPA provided responses to information requests listed in Appendix B³ and Appendix C⁴. PREPA also requested additional time from the Energy Bureau to provide responses to the outstanding requirements for information.⁵

PREPA provides below an illustrative table specifying the requirement of information and the corresponding response or document production prepared by PREPA for the eight (8) pending responses. Exhibit A.

¹ *Motion in Compliance with Request for Information and Production of Documents* dated September 25 2020 (the “Motion in Compliance”).

² *Order* September 4, 2020 (“the Order”).

³ Appendix B Questions for Stakeholders of the Order.

⁴ Appendix C Information Requests.

⁵ Upon review of the Motion in Compliance and the requests for information PREPA clarifies there were eight (8) pending responses to the Appendix C requests, not six (6) as previously stated.

Requirement of Information	Response
<p>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.</p>	<p>See Item 1</p>
<p>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:</p> <ul style="list-style-type: none"> 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. 	<p>Finance and Information Technology directorates are working diligently to provide the response as soon as possible.</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 and T&D directorates are working diligently to provide the response as soon as possible.</p>
<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>Finance and Generation directorates are working diligently to provide the response as soon as possible.</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>See Item 13</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 Directorate and Supplies Office are working diligently to provide the response as soon as possible.</p>
<p>16. Please describe the level of effort and cost that would be entailed in sampling each customer class to estimate service line costs.</p>	<p>Finance and T&D directorates are working diligently to provide the response as soon as possible.</p>
<p>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).</p>	<p>Finance and T&D directorates are working diligently to provide the response as soon as possible.</p>

The Energy Bureau is aware of PREPA’s employee attrition and how this affects the corporation. Moreover, the officers in charge of responding to the requests are simultaneously working with producing information to respond other requests made by the Energy Bureau in parallel dockets, as well as requests made by other entities, such as LUMA, and last but not less important, complying with their duties and regular work tasks. Wherefore, even though PREPA worked dedicatedly to meet the requested deadline, it was unable to complete all the production of the information necessary to address the outstanding requests. PREPA understands that the information can be submitted to the Energy Bureau on or before the next fifteen (15) days.

WHEREFORE, PREPA respectfully requests the Energy Bureau note the partial compliance with the Order and to grant an extension of fifteen (15) days, to submit the responses to the outstanding requests.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of October 2020.

/s Joannely Marrero Cruz
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Exhibit A

https://diazvaz-my.sharepoint.com/:f/g/personal/kbolanos_diazvaz_law/EsHY-s0wpK1NtWQ5zpdHQb8Bd8OMfvOZmhHAFL1aSQZMAw?e=68cQF5