

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

<del>0116</del> <b>NEPR</b> <b>Received:</b> <b>Oct 23, 2020</b> <b>7:58 PM</b>
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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:

Responses to Requirements for Information  
and Production of Documents.

**MOTION TO SUBMIT OUTSTANDING RESPONSES TO REQUIREMENTS OF  
INFORMATION AND TO REQUEST PERMISSION TO SUPPLEMENT**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, the Puerto Rico Electric Power Authority, through its counsel of record and respectfully sets forth and prays:

1. On October 19, 2020 the Puerto Rico Electric Power Authority (PREPA) filed a *Request for Nunc Pro Tunc Order Granting Extension of Time* (the “October 19 Motion”) with the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) to grant PREPA an extension of time until today October 23, 2020, to submit the responses for the outstanding requirements for information issued by the Energy Bureau<sup>1</sup>.
2. As pleaded in the October 19, 2020 Motion, PREPA’s extension of time requests were made in good faith, when all recourses have been exhausted and not by disregard to the Energy Bureau’s authority or orders.

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<sup>1</sup> See, the October 19 2020 Motion at p.3. The Authority requested the Energy Bureau to: i) enter an order *nunc pro tunc* order granting an extension of time until October 23,2020 to complete the response to the September 4 Order regarding outstanding requests; and ii) enter an order granting an extension of time until October 23, 2020 to file responses to the Second IDR.

3. As evidenced during October 22, 2020 the technical conference, PREPA has put together a working team involving officials from the Planning, Generation, Finance, Customer Service, Transmission and Distribution, and the Information and Technology Directorates to comply with the Energy Bureau's orders and hard work that has been put into by PREPA officials to adequately and responsibly comply with orders in the case of caption. The PREPA officials within these Directorates that have the relevant knowledge to provide the information are few and they are working tirelessly to comply with this and other matters and dockets before the Energy Bureau. Additionally, as PREPA embarks in the transition process with LUMA, these same officials are also complying with their regular work and the many requirements for information made by LUMA. While we understand the Energy Bureau's frustration with this reality and its expression that this this justification is tired, it is a fact that the results of employee attrition in PREPA is an everyday experience.

4. In the present submittal, PREPA will provide responses to pending requirements for information. However, and in spite of great efforts and honest commitments, the answers to some questions remain outstanding. Accordingly, PREPA respectfully asks the Honorable Energy Bureau to allow PREPA to supplement the pending responses on October 30, 2020 when the responses to the October 14 Order<sup>2</sup> are due.

5. In compliance with the order, PREPA hereby provides an illustrative table specifying the requirements of information and follow up questions made by the Honorable Energy Bureau and the corresponding responses. Exhibit A.

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<sup>2</sup> *Resolution and Order* issued on October 14, 2020 (the "October 14 Order").

Request for Information 9/04/20	Pending / Completed	Follow-up Request for Information 10/09/20	Responses
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.	<b>Completed</b>	Follow-up to IR 1: It appears that the October 2nd response includes data for FY 2018- 19, but not FY 2019-20.  Is the relevant data available for FY 2019-20?	Finance directorate is working diligently to provide the response as soon as possible.
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	<b>Pending</b>		Finance and Information Technology directorates are working diligently to provide the response as soon as possible.  Information & Technology Directorate expressed that the requested report is not a standard report, it does not exist in the PREPA database.  PREPA has completed the design, for which trials have been running, however once the report is complete information will have to be coordinated with the Finance Directorate.

<p>outage hours, planned outage hours, maintenance outage hours, and derating hours.</p>			
<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><b>Completed</b></p>	<p>Follow-up to IR 6: For each substation, please provide available peak load data (MW, date, and time).</p>	<p>Mrs. Joseline Estrada, who provided the original response and was not available to supplement due to a programmed leave, afforded until October 26,2020.</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><b>Pending</b></p>		<p>Finance and T&amp;D directorates are working diligently to provide the response as soon as possible.</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><b>Completed</b></p>	<p>Follow up to IR 11: Is there any load data describing usage of individual transmission lines or segments of transmission lines? If so, please describe said data.</p>	<p>Pending further clarification to the question PREPA provided the following response, to the best of their knowledge: Energy Control Center transmission operators report trips and work related to transmission lines or segments. Information related to load data from those</p>

			<p>transmission lines or segments can be define by two sources:</p> <ol style="list-style-type: none"> <li>1. The Line Clearances Office publishes a transmission lines and segment construction data, which presents general specifications for those lines. The last update of those reports was published on December 2012.</li> <li>2. Transmission lines data (MW, MVAR, MVA, AMP) is scan and store constantly thru our SCADA as part of the Energy Management System (EMS). Data is stored in a EMS service known as Historic Information System (HIS).</li> </ol>
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	N/A	N/A	Finance Directorate is working diligently to provide the response as soon as possible.
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)	<b>Pending</b>	<p>Supplement your responses to the First Set of IR to provide the following clarification:</p> <p>IR 14 - Has PREPA analyzed metering costs by customer class in the last decade?</p>	Customer Service Directorate and Supplies Office are working diligently to provide the response as soon as possible.

<p>starting to comprehensively collect metering cost data.</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><b>Completed</b></p>	<p>Follow up to IR 15: PREPA provides a report on metering types but did not include an explanation of the relevant codes in the data.</p> <p>a. Please explain the codes for "SP_TYPE_CD" and "MTR_TYPE_CD."</p> <p>b. Please confirm whether "CountOfSPID" refers to a number of meters.</p> <p>c. Please provide any available data on the recent cost of meters of each meter type or meter code.</p>	<p>a. SP_TYPE_CD is the form factor of the meter, physical category, for example, the number of connections and the layout.</p> <p>b. "CountOfSPID" is the count of points of services. If active, should be the same amount.</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><b>Completed</b></p>	<p>N/A</p>	<p>See Item 16</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><b>Completed</b></p>	<p>N/A</p>	<p>Distribution lines and equipment are tracked from primary lines and equipment until service transformer via GIS applications.</p>

<p>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 effort and cost to begin to track such data.</p>	<p><b>Completed</b></p>	<p>Follow ups to IR 18: PREPA provided a spreadsheet with over 800,000 data points in response to this request. Each data point is identified by a number in a category labeled FID, with the following explanation: "FID correspond [s] to the transformer or primary meter where the electrical account is connected according to G/Electric."</p> <p>a. Please describe whether there is a means to determine whether an individual FID represents a primary meter or a transformer.</p> <p>b. Does this data include transmission and sub-transmission level customers? Compared to other jurisdiction, this is a higher than expected number of primary meters and transformers per customer, which would indicate that relatively few transformers are shared, and that any shared transformers are not typically connected to more than a few customers. Is this consistent with</p>	<p>See Item 18</p>

		PREPA's understanding of its distribution system and transformer layout?	
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6. The responses sought by the Energy Bureau in the various orders, require input and expertise from different areas. Once the Planning Directorate, in charge of the case of caption, identifies the area with the expertise to respond to the request for information or that should have the information available, Planning refers them to the appropriate staff members and also, establishes the deadline for the responsible officials to produce the response to the Planning Directorate. As the Planning Directorate begins to receive the responses, often, responses may need to be revised and referred to other areas for additional information. For this reason, despite PREPA’s officials’ best efforts and diligence, some information requests given to the Finance, Transmission and Distribution and IT and Customer Service Directorates are currently pending.

WHEREFORE, PREPA respectfully requests the Energy Bureau to the FIND PREPA IN PARTIAL COMPLIANCE with the September 4, 2020 and the October 9, 2020 Orders and allow PREPA an opportunity to supplement the outstanding responses to the requirements of information in the October 30, 2020 filing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 23<sup>rd</sup> 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/EneKOhNBdQtOm110iL4aBnABxi4PL7h089LHFZwX6N4R2w?e=UY9wTk](https://diazvaz-my.sharepoint.com/:f:/g/personal/kbolanos_diazvaz_law/EneKOhNBdQtOm110iL4aBnABxi4PL7h089LHFZwX6N4R2w?e=UY9wTk)