

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

NEPR

Received:

Oct 2, 2020

6:05 PM

IN RE:

**REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN**

CASE NO.: CEPR-AP-2018-0001

SUBJECT:
Procurement Plan

SECOND REQUEST FOR TECHNICAL CONFERENCE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority through the undersigned legal representation and respectfully submits and requests as follows:

On August 24, 2020, the Energy Bureau¹ entered the Final IRP Order.² Pursuant to the Final IRP Order, on September 23, 2020, the Authority submitted the Status Report.³ With the submittal, the Authority moved the Energy Bureau to schedule a technical conference to discuss the Status Report.⁴ To date, the Energy Bureau has not entered an order noting the filing of the Status Report, nor granting the request to schedule a technical conference.

Pursuant to the Final IRP Order, the Procurement Plan must be filed on or before October 23, 2020.⁵ The Authority deems convenient and necessary that it discusses the Status Report with the Energy Bureau with sufficient time before the deadline to receive its comments and guidance of what the Authority should address or amend, if anything.

¹ Capitalized terms not defined herein shall be ascribed the same meaning provided in the *Presentation of Status Report on Draft Procurement Plan* filed on September 23, 2020 (the “Status Report Motion”).

² IRP Order at pags. 266-269, ¶¶ 860-867.

³ See Status Report Motion at Exhibit A.

⁴ *Id.* at ¶ 3.

⁵ IRP Final Order at ¶ 92 (“Development by PREPA, with the Energy Bureau’s *guidance* and approval, of a detailed procurement plan for renewable resources and battery energy storage. to achieve compliance with the renewable portfolio standard (RPS)”) (emphasis added).

WHEREFORE, the Authority requests the Energy Bureau to schedule a technical conference to discuss the Status Report.

RESPECTFULLY SUBMITTED.

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

/s Katuska Bolaños
Katuska Bolaños
kbolanos@diazvaz.law
TSPR 18,888

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.
290 Jesús T. Piñero Ave.
Oriental Tower, Suite 1105
San Juan, PR 00918
Tel.: (787) 395-7133
Fax. (787) 497-9664

CERTIFICATE OF SERVICE

It is hereby certified that, on this same date I have filed the above motion using the Energy Bureau's Electronic Filing System, at the following address: <http://radicacion.energia.pr.gov> and that a courtesy copy of the filing was sent via e-mail to: sierra@arctas.com; tonytorres2366@gmail.com; cfl@mcvpr.com; gnr@mcvpr.com; info@liga.coop; amaneser2020@gmail.com; hrivera@oipc.pr.gov; jrivera@cnslpr.com; carlos.reyes@ecoelectrica.com; ccf@tcmrslaw.com; manuelgabrielfernandez@gmail.com; acarbo@edf.org; pedrosaade5@gmail.com; rmurthy@earthjustice.org; rstgo2@gmail.com; larroyo@earthjustice.org; jluebkmann@earthjustice.org; acasellas@amgprlaw.com; loliver@amgprlaw.com; epo@amgprlaw.com; robert.berezin@weil.com; marcia.goldstein@weil.com; jonathan.polkes@weil.com; gregory.silbert@weil.com; agraitfe@agraitlawpr.com; maortiz@lvprlaw.com; rnegron@dnlawpr.com; castrodieppalaw@gmail.com; voxpopulix@gmail.com; paul.demoudt@shell.com; javier.ruajovet@sunrun.com; escott@ferraiuoli.com; SProctor@huntonak.com; GiaCribbs@huntonak.com; mgrpcorp@gmail.com; aconer.pr@gmail.com; axel.colon@aes.com; rtorbert@rmi.org; apagan@mpmlawpr.com; sboxerman@sidley.com; bmundel@sidley.com.

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

s/ Katuska Bolaños
Katuska Bolaños