

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

NEPR Received: Dec 2, 2020 5:54 PM

IN RE: IMPLEMENTATION OF THE
PUERTO RICO ELECTRIC POWER
AUTHORITY INTEGRATED RESOURCE
PLAN AND MODIFIED ACTION PLAN

CASE NO.: NEPR-MI-2020-0012

SUBJECT:
Procurement Plan

THIRD MOTION REITERATING REQUEST FOR TECHNICAL CONFERENCE

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW the Puerto Rico Electric Power Authority (the “Authority”) through the undersigned counsel and respectfully submits and requests as follows:

1. On November 23, 2020 the Puerto Rico Electric Power Authority (“PREPA” or the “Authority”), filed with the Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) *Motion to Reiterate Request for Technical Conference* (“Motion”). In the Motion, the Authority insisted with the Energy Bureau on the scheduling of a technical conference needed for guidance and feedback so that the Authority can responsibly manage expectations and comply with the pending deadlines related to the RFP and Procurement Plan.

2. As stated in the Motion, the requested technical conference will be beneficial to both the Authority and the Energy Bureau as it will allow the Authority’s personnel and consultants to present the Energy Bureau with additional matters for which PREPA would like to receive feedback. Further, a technical conference would also serve to clarify any questions that the Energy Bureau might have regarding the Draft Procurement Plan.

3. In furtherance of the technical conference and considering that the Draft Procurement Plan is a very complex document that includes different processes and technologies that the Authority

has not procured before, on November 17, 2020, the Authority filed with the Energy Bureau a presentation to be discussed during the technical conference.¹ The Authority is confident that the Presentation will aid in the discussion of the Draft Procurement Plan and will thus make the conference more productive.

4. Unfortunately, as of this date and after various motions and attempts by the Authority to receive feedback, the Energy Bureau has neither noted the filing of the Draft Procurement Plan, nor granted the Request for Technical Conference. As stated before, time is of the essence and the Authority is very concerned by the lack of response from the Energy Bureau. The IRP Order directs the Authority to open a request for proposals (RFP) for the first tranche of renewable energy and battery energy storage by December 2020. However, to date, the Energy Bureau has not approved the Procurement Plan, which pursuant to the IRP Order, is the tool that will serve as guideline for all the RFP tranches, including the first one to be released on or before December 2020.

5. Finally, it is imperative to reiterate that various processes within PREPA must be complied with before releasing the first tranche of renewables and storage RFP and after the Energy Bureau approves the Procurement Plan. These processes include the submission of the draft RFP and attachments to a committee which in turn must submit the draft for approval by the Authority's Governing Board. Lastly, PREPA must comply with the processes mandated by Regulation 8815.

6. The scheduling of a technical conference is necessary for PREPA to be able to adequately and responsibly comply with the RFP by the ordered deadline. The continued postponement of the technical conference by the Energy Bureau will undoubtedly affect the Authority's ability to comply with the release of the first RFP tranche by the ordered deadline.

¹ *Motion to Submit Presentation for Technical Conference* filed by the Authority on November 17, 2020.

WHEREFORE, the Authority respectfully reiterates its request for technical conference to discuss the Draft Procurement Plan as soon as possible.

RESPECTFULLY SUBMITTED.

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

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