

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

NEPR

Received:

Jan 19, 2021

7:29 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: Additional Questions for
PREPA**

**LOCAL ENVIRONMENTAL ORGANIZATIONS' ADDITIONAL
QUESTIONS FOR PREPA**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW, Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc. -Enlace Latino de Acción Climática, Comité Yabucoño Pro-Calidad de Vida, Inc., Alianza Comunitaria Ambientalista del Sureste, Inc., Sierra Club and its Puerto Rico chapter, Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., Campamento Contra las Cenizas en Peñuelas, Inc., and CAMBIO Puerto Rico, Inc., (“Local Environmental Organizations”), to file additional questions for PREPA, as directed by PREB.

On January 14, 2021, the Puerto Rico Energy Bureau held a stakeholder meeting in this docket, where PREPA’s representatives, advisors and attorneys were present to answer questions from the Commissioners, PREB’s consultant, and the interested members of the public. At the conclusion of the meeting, PREB ruled that stakeholders could submit additional questions, which PREPA would be required to answer.¹ In accordance with that ruling, Local Environmental Organizations set forth the following questions.

1. Describe the relationship between T&D investments and the amount of onsite generation.
2. Could T&D investments be reduced in a scenario with high onsite generation?
3. Could federal funds available to PREPA be used to make onsite solar + storage accessible to PR ratepayers?
4. PREPA is seeking billions of dollars from the Federal Emergency Management Agency (“FEMA”). Has FEMA imposed any restrictions that would prohibit investing these monies in renewables, storage, or distributed renewables + storage? If so, please provide documents detailing these restrictions.

¹ <https://youtu.be/rYIXt0eRSV8?t=18347>

5. PREPA is proposing to acquire new gas-fired generation at Palo Seco. Why doesn't PREPA propose to acquire solar + storage equipment for rooftop solar through a transparent RFP process?
6. How will onsite solar + storage be made accessible to low and middle income residents and businesses in Puerto Rico who cannot finance or lease these systems?
7. PREB's January 7, 2021 Resolution And Order, p. 5, stated that "The conventional process of conducting, in sequence, feasibility, impact, and facilities studies is not the only path PREPA can consider for accelerating the process of assessing technical interconnection issues while simultaneously meeting requirements for Puerto Rico's needs for new renewable energy resources." What alternate paths has PREPA considered for accelerating this process?
8. For each of the following documents filed with PREPA's December 22, 2020 Motion For Reconsideration, please state whether (and when) PREPA will provide the public with full access to the document:
 - RFP Draft Template
 - PPOA Draft Template
 - ESSA Draft Template
 - Joint Regulations 8815
 - Procurement Plan Appendix B
 - Renewable Energy RFP

- Minimum Technical Requirements
- Proposal Data Forms
- Appendix I: Interconnection, Solar, Wind
- Appendix J: Preferred Location of Energy Resources
- Appendix F: Form of Energy Storage Services Agreement
- Appendix E: Solar PPOA
- Renewable Integration Study of Puerto Rico
- Utility Scale Preferred Locations
- Utility Scale RE and BESS Preferential Locations Maps

Respectfully submitted,

s/ Pedro Saadé

PEDRO J. SAADÉ LLORÉNS
Colegiado Núm. 5452
(RUA Núm. 4182)
Calle Condado 605, Oficina 611
San Juan, Puerto Rico 00907
Tel. & Fax (787) 948-4142
pedrosaade5@gmail.com

s/ Ruth Santiago

RUTH SANTIAGO
RUA Núm. 8589
Apartado 518
Salinas, Puerto Rico 00751
Tel. (787) 312-2223
rstgo@gmail.com

s/Raghu Murthy

RAGHU MURTHY
Earthjustice
48 Wall Street, 15th Floor
New York, NY 10005
Tel. (212) 823-4991
rmurthy@earthjustice.org

s/Laura Arroyo

LAURA ARROYO
RUA Núm. 16653
Earthjustice
4500 Biscayne Blvd Ste 201
Miami, FL 33137
Tel. (305) 440-5436
larroyo@earthjustice.org

s/Jordan Luebke

JORDAN LUEBKEMANN
Florida Bar No. 1015603
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
Tel. (850) 681-0031
jluebke@earthjustice.org

CERTIFICATE OF SERVICE

We hereby certify that, on January 19, 2021, we have filed this document via the Energy Bureau's online filing system, and sent to the Puerto Rico Energy Bureau Clerk and legal counsel to: secretaria@energia.pr.gov; astrid.rodriguez@prepa.com; jorge.ruiz@prepa.com; n-vazquez@aeepr.com; c-aquino@prepa.com and kbolanos@diazvaz.law

Respectfully submitted on this day January 19, 2021.

s/Pedro Saadé

PEDRO J. SAADÉ LLORÉNS
Colegiado Núm. 5452
RUA Núm. 4182
Calle Condado 605, Oficina 611
San Juan, Puerto Rico 00907
Tel & Fax (787) 948-4142
pedrosaade5@gmail.com

s/Raghu Murthy

RAGHU MURTHY
Earthjustice
48 Wall Street, 15th Floor
New York, NY 10005
Tel. (212) 823-4991
rmurthy@earthjustice.org