

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

<b>NEPR</b>  <b>Received:</b>  <b>Jan 11, 2021</b>  <b>11:11 AM</b>
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**IN RE:** IMPLEMENTATION OF THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY INTEGRATED RESOURCE  
PLAN AND MODIFIED ACTION PLAN

**CASE NO.:** NEPR-MI-2020-0012

**SUBJECT:** Draft Procurement Plan

**MOTION IN COMPLIANCE WITH ORDER SUBMITTING REDACTED/PUBLIC  
VERSIONS OF REQUEST FOR PROPOSAL (RFP) AND APPENDICES**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

On January 7, 2021, the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the “Energy Bureau”) entered *Resolution* in the captioned case (the “January 7 *Resolution*”) ordering PREPA to submit by today redacted/public versions of all of the Appendices which PREPA included with its December 22, 2020 Motion in Compliance with Order Submitting Final Procurement Plan and Associated Request for Proposals (“December 22 Motion in Compliance”).

The January 7 Resolution granted partial confidential designation and treatment of the Appendices attached to the December 22 Motion in Compliance in accordance with the provisions of Article 6.15 of Act 57- 2014 and after taking into account the fact that information included in the filings was considered Critical Energy Infrastructure Information (“CEII”). However, in seeking to protect confidential information in a manner that least affects the public interest, transparency, and the rights of the parties involved in the case, the Energy Bureau required PREPA to submit on or before Monday January 11, 2020 at 12:00 pm, redacted/public versions of all of the of the Appendices submitted with the December 22 Motion in Compliance including, but not

limited to, the RFP and all its attachments. The Energy Bureau further ordered PREPA to ensure that the redactions be limited and restricted to those items of information or images that explicitly and clearly divulge CEII.

In compliance with the Order PREPA submits to the Energy Bureau the following redacted/public versions of the documents attached to the December 22 Motion in Compliance:

1. 01 Procurement Plan\_05 (PREB Submission Version)
2. 02 Procurement Plan Appendix B\_22Dec2020
3. 03 RE RFP\_02B (PREB Submittal Version II)
  - a. 03 RE RFP\_Appendix H\_MTRs
  - b. 03 RE RFP\_Appendix C\_Proposal Data Forms
  - c. 03 RE RFP\_Appendix I\_Interconnection\_BESS
  - d. 03 RE RFP\_Appendix I\_Interconnection\_Solar
  - e. 03 RE RFP\_Appendix I\_Interconnection\_Wind
  - f. 03 Appendix F\_Form of Energy Storage Services Agreement - Appendix F\_Form of Energy Storage Services Agreement
  - g. 03 Solar PPOA\_RE RFP\_02 - Appendix E\_Form of Solar PPOA.
4. 04 SL Renewable Integration Study of Puerto Rico 22Dec2020\_Final

In the case of documents containing CEII information such as coordinates and/or map locations, the Energy Bureau ordered PREPA to provide the list of municipalities where the preferred sites are located and the number of sites per municipality. In consideration to the inherent concerns regarding disclosure of interconnection preferred locations, including their protection as CEII, on this same day PREPA has filed "*Motion for Reconsideration and Modification of January 7, 2021 on Request for Confidential Designation and Treatment of Identifying Preferred Locations for Interconnection*" which addresses and discusses PREPA's apprehensions with divulging the preferred locations included in documents identified as 03 RE RFP Appendix J Preferred Location of Energy Resources; 05 Utility Scale Interconnections Preferred Locations; and 06 Utility Scale RE and BESS Preferential Locations Maps in the December 22 Motion in Compliance.

WHEREFORE, PREPA requests the Energy Bureau to FIND PREPA in compliance with Order entered on January 7, 2021 regarding submittal of redacted/public versions of Appendices submitted as part of the December 22 Motion in Compliance regarding Final Procurement Plan and RFP.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 11<sup>th</sup> day of January 2021.

*s/ Maralíz Vázquez-Marrero*

Maralíz Vázquez-Marrero

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Exhibit A

[https://my.sharepoint.com/:f/g/person/jmarrero\\_diazvaz\\_law/EtNQIqFgOHxNrnBgt1ZvYAB2QjMjHbnNPsO9Kg\\_wrGx5A?e=o0I5KN](https://my.sharepoint.com/:f/g/person/jmarrero_diazvaz_law/EtNQIqFgOHxNrnBgt1ZvYAB2QjMjHbnNPsO9Kg_wrGx5A?e=o0I5KN)