

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

NEER

Received:

Apr 16, 2021

11:31 AM

IN RE: THE UNBUNDLING OF THE
ASSETS OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY

CASE NO.:
NEPR-AP-2018-0004

SUBJECT:
Weekly Status Report;
April 16, 2021

**MOTION TO SUBMIT WEEKLY STATUS REPORT FOR
THE WEEK ENDING ON APRIL 16, 2021**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, the Puerto Rico Electric Power Authority (the “Authority”), through its undersigned counsel and, in compliance with the February 5, 2021 Order¹, respectfully submits the *Estimate of Deliverables and Timing of Meeting Regulatory Commitment for an Unbundled Rate Proposal* (the “Weekly Status Report”) dated April 16, 2021. Exhibit A.

The Weekly Status Report summarizes the projected schedule duration, identifies milestones completed, lists and describes major tasks performed, and provides a progress timeline.

WHEREFORE, the Authority respectfully requests the Puerto Rico Energy Bureau of the Public Service Regulatory Board to note the Authority’s compliance with the Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 16th day of April 2021.

¹ *Resolution and Order* entered on February 5, 2021 (the “Order”).

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CERTIFICATE OF SERVICE

It is hereby certified that, on this same date, I have filed the above motion with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and a courtesy copy of the filing was sent via e-mail to hrivera@oipc.pr.gov, ramonluisnieves@rlnlegal.com; manualgabrielfernandez@gmail.com; ccf@tcm.law.

In San Juan, Puerto Rico, this 16th day of April 2021.

/s Joannely Marrero Cruz

Joannely Marrero Cruz

Exhibit A



Memorandum

To: Puerto Rico Electric Power Authority

From: Guidehouse

Date: April 16, 2021

Re: Puerto Rico Energy Bureau Weekly Status Report, *Estimate of Deliverables and Timing of Meeting Regulatory Commitment for an Unbundled Rate Proposal*

This status report describes work performed in the preceding week, **April 9 – 15**, 2021, on the tasks outlined in the *Estimate of Deliverables and Timing of Meeting Regulatory Commitment for an Unbundled Rate Proposal*, in support of the May 10, 2021 filing deadline established by the Energy Bureau.

Description of Work Performed

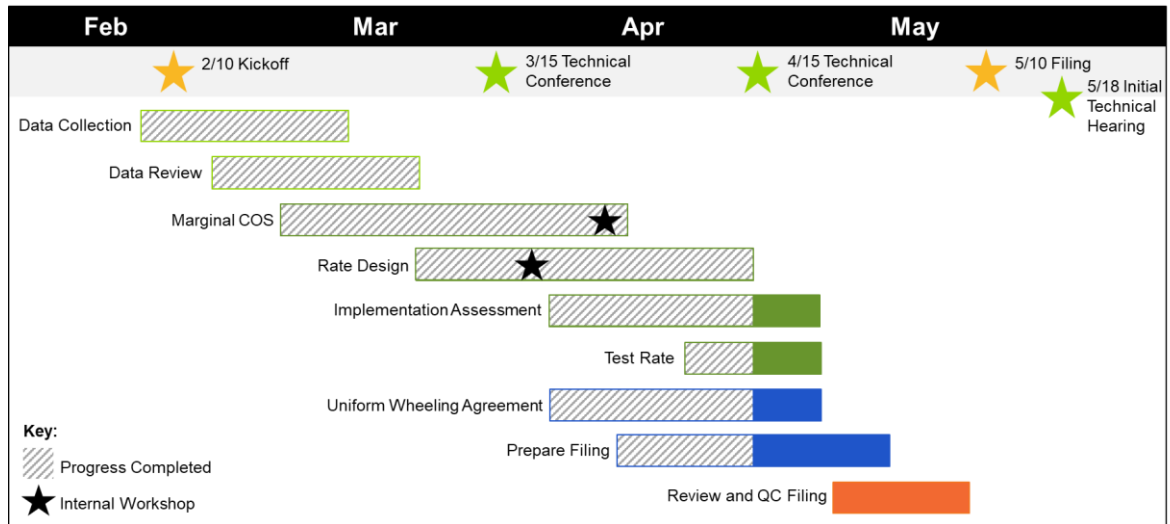
- Guidehouse developed an unbundled rate structure and tested the rate concepts, resulting in several findings and the identification of several risks and uncertainties. These findings, risk and challenges were presented at the April 15 Technical Conference.
- Guidehouse prepared a draft uniform wheeling agreement term sheet and finalized many aspects of the agreement and also identified several risks and uncertainties with the wheeling operating model. These aspects, risks and challenges were presented at the April 15 Technical Conference.
- Guidehouse conducted interviews for the Rate Implementation Assessment with PREPA staff and scheduled interviews with LUMA staff.
- Guidehouse prepared draft filing exhibits related to the above-mentioned unbundled rate structure and wheeling operating model.
- Guidehouse, PREPA and LUMA held a project check-in meeting on April 14.
- Guidehouse presented at the April 15 Technical Conference and participated in discussion and Q&A with PREB consultants and intervenors on questions including but not limited to:
 - Marginal and residual cost explanations and clarifications
 - Rate true-up mechanisms
 - Wheeling operating model example scenarios and related risks
 - Billing roles and responsibilities
 - ESP charges including congestion and performance charges
 - Return rates for customers moving between PREPA and an ESP



Progress by Task

Task	Description	Estimated Duration ¹	Progress
Data Collection	Gather all relevant cost, planning and load forecast data from PREPA, to include anticipated transmission flows and interconnections.	3 weeks	100%
Data Review	Review data for quality and design proxies where data are insufficient or poor in quality.	3 weeks	100%
Cost of Service Study	Conduct marginal cost of service study, which includes reviewing all planned projects and identification of which projects are designed to meet load growth versus infrastructure improvements, lifecycle replacement and grid hardening.	4 weeks	100%
Rate Design	Design wheeling rate based on cost of service study results.	5 weeks	95%
Implementation Assessment	Interview key PREPA personnel responsible for billing, contract management, metering, accounting, and other organizations as needed to determine what PREPA's capabilities are to implement and maintain the proposed wheeling rate.	4 weeks	60%
Test Rate	Test wheeling rate against different ESPC demands.	2 weeks	50%
Uniform Wheeling Agreement	Develop a uniform wheeling services agreement and vet with PREPA's legal teams.	4 weeks	60%
Filing Preparation	Prepare regulatory filing, including professional testimony and supporting workpapers.	4 weeks	40%
Filing Review	Review and QC final workpapers and testimony.	2 weeks	0%

¹ Tasks will be performed in parallel.



Issue Register

No issues to report at this time.