

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

NEPR

Received:

Apr 9, 2021

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IN RE: REVIEW OF THE PUERTO RICO
ELECTRIC POWER AUTHORITY
INTEGRATED RESOURCE PLAN

CASE NO.: CEPR-AP-2018-0001

SUBJECT: Supplement to Hydroelectric
Study Monthly Status Report; Memorandum
for Confidentiality.

**MOTION TO SUPPLEMENT THE MARCH 2021
MONTHLY STATUS REPORT ON HYDRO STUDY**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COMES NOW, the Puerto Rico Electric Power Authority, through its counsel of record and respectfully sets forth and prays:

I. INTRODUCTION

1. On August 24, 2020, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) entered *Final Resolution and Order on the Puerto Rico Electric Power Authority’s Integrated Resource Plan* (the “Final IRP Order”) directing the Puerto Rico Electric Power Authority (the “Authority”) to, among other things, complete and submit a feasibility study of refurbishing each all the hydroelectric facilities (the “Hydro Study”). Pursuant to the Final IRP Order, the deadline to present the Hydro Study was February 22, 2021.

2. On February 22, 2021, the Authority submitted to the Energy Bureau *Motion to Submit Status Report of Feasibility Study for Improvement of PREPA’s Hydroelectric System and to Request Extension of Time to Submit Final Study* (the “Request for Extension”).

3. In the Request for Extension, the Authority informed the Energy Bureau that it had retained the services of Black and Veatch Puerto Rico, PSC (“Black and Veatch”) to conduct the Hydro Study in compliance with the Final IRP Order. The Authority also informed that it would submit to the Energy Bureau a status report of the project on a monthly basis.

4. Pursuant to the above stated, the Authority has submitted the Black & Veatch *Project Status Report* (the “Monthly Status Report”) for the months of February 2021 and March 2021.

5. The Authority hereby presents a supplement to the March 2021 Monthly Status Report titled *Project Progress Report* dated March 25, 2021. Exhibit A. The Authority also submits the feasibility studies completed up to date by Black and Veatch referenced in the March 2021 Monthly Status Report (the “Feasibility Studies”). Exhibit B.

6. The Feasibility Studies include detailed descriptions of the hydroelectric assets, site visits, recommendations made by Black and Veatch for the improvements of the Authority’s Hydro facilities and chronicles the progress of the work done by Black and Veatch up to date with no conclusions made by the Authority. The process to complete the Hydro Study is still underway.

II. MEMORANDUM OF LAW

Article 6.15 of the *Puerto Rico Energy Transformation and RELIEF Act*, Act No. 57 of 2014, as amended (“Act 57-2014”), provides that “any person who is required to submit information to the Energy [Bureau] believes that the information to be submitted has any confidentiality privilege, such person may request the [Bureau] to treat such information as such[.]”¹ “If the Energy [Bureau], after the appropriate evaluation, believes such information should be protected, it shall grant such protection in a manner that least affects the public interest, transparency, and the rights of the parties involved in the administrative procedure in which the

¹ 9 L.P.R.A § 1054n.

allegedly confidential document is submitted.”² If the Energy Bureau determines that the information is confidential, “the information shall be duly safeguarded and delivered exclusively to the personnel of the Energy [Bureau] who needs to know such information under nondisclosure agreements.”³ “The Energy [Bureau] shall swiftly act on any privilege and confidentiality claim made by a person subject to its jurisdiction by means of a resolution to such purposes before any allegedly confidential information is disclosed.”⁴

Pursuant to its vested powers, the Energy Bureau approved the *Regulation on Adjudicative, Notices of Compliance, Rate Review and Investigations Proceedings* (the “Regulation 8543”). Regarding the safeguards that the Energy Bureau gives to confidential information, Regulation 8543 provides that:

[i]f in compliance with the provisions of [Regulation 8543] or any of the Energy Bureau’s orders, a person has the duty to disclose to the Energy Bureau information considered to be privileged pursuant to the Rules of Evidence, said person shall identify the allegedly privileged information, request the Energy Bureau the protection of said information, and provide supportive arguments, in writing, for a claim of information of privileged nature. The Energy Bureau shall evaluate the petition and, if it understands the material merits protection, proceed according to what is set forth in Article 6.15 of Act No. 57-2014, as amended.⁵

a. Trade Secrets

Exhibit B to the Motion contains information that qualifies as proprietary and includes trade secrets (*i.e.*, confidential and other protected information) which is protected under Puerto Rico law.⁶ Regulation 8543 specifically provides for the designation of such information as

² *Id.* at § 1054n(a).

³ *Id.* at § 1054n(c).

⁴ *Id.* at § 1054n(d).

⁵ Regulation 8543 at sec. 1.15.

⁶ See *Industrial and Trade Secret Protection Act of Puerto Rico*, as amended, Act No. 80-2011; see Act No. 57-2014, art. 6.15 (establishing that any person having the obligation to submit information to the Energy Bureau can request privileged or confidential treatment of any information which the submitting party believes to warrant such protection).

confidential.⁷

The *Industrial and Trade Secret Protection Act of Puerto Rico* (“Act 80-2011”)⁸ defines a trade secret as any information that

has a present or a potential independent financial value or that provides a business advantage, insofar as such information is not common knowledge or readily accessible through proper means by persons who could make a monetary profit from the use or disclosure of such information; and [f]or which reasonable security y measures have been taken, as circumstances dictate, to maintain its confidentiality.⁹

Trade secrets may take a variety of forms, including a process to manufacture, treat or preserve materials, a formula or recipe, a project or pattern to develop machinery, or simply a list of specialized clients that constitute a specific market which provides the owner with an advantage over its competitors.¹⁰ These examples are not exhaustive, however, and the Legislative Assembly has acknowledged in Act 80-2011's Statement of Motives, the broad definition of a trade secret includes "any confidential information with trade or industrial value, which its owner reasonably protects to prevent its disclosure."¹¹ In Puerto Rico, moreover, trade secrets "do not require registration or compliance with any formalities in order to be protected."¹²

As the Legislative Assembly has noted, "failure to protect trade secrets could leave companies at the mercy of any competitor or former employee who gains knowledge of any such secret, whether directly from the owner or by other means."¹³

⁷ Regulation 8543 at sec. 1.15 (recognizing appropriateness of according to proprietary information and trade secrets Confidential treatment); *cf.* Regulation 9021, *Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority* duly recorded in the Puerto Rice Department of State on April 24, 2018, 1.15 (providing for designation of information submitted in support of an integrated resource plan as confidential).

⁸ 10 L.P.R.A. § 4131, *et seq.*

⁹ 10 L.P.R.A. § 4132.

¹⁰ Act 80-2011 at Statement of Motives.

¹¹ *Id.*

¹² *Id.*

¹³ *Id.*

PREPA, as a public body whose costs are ultimately borne by citizens of Puerto Rico, has a strong interest in protecting its trade secrets. The information included Exhibit B proprietary, commercially sensitive and qualifies as trade secrets. The disclosure of this information could place PREPA in a competitively disadvantageous position in dealing with potential proponents, ultimately harming customers. Therefore, PREPA requests the Energy Bureau to grant confidential designation to Exhibits B.

b. Deliberative Process Privilege

The Feasibility Reports in Exhibit B include recommendations for improvements to hydroelectric facilities, with no conclusions by the Authority, as the work by Black and Veatch is still ongoing. The final report is projected to be submitted by June 22, 2021.

The documents produced by PREPA are public. However, access to public information is not absolute and there are various exemptions for the access of public information.¹⁴ These exemptions are:

(a) a law so declares; (2) the communication is protected by one of the evidentiary privileges that the citizens may invoke; (3) revealing the information may injure the fundamental rights of third parties; (4) it deals with the identity of a confidante and (5) it is ‘official information’ pursuant to Rule 514 of Evidence, 2009, 32 LPRA Ap. VI (formerly Rule 31 of Evidence 32 LPRA for. Ap. IV). *Colon Cabrera v. Caribbean Petroleum, supra*.¹⁵

A claim of confidentiality on the part of the government can prosper when the information is considered official privileged information, among others. *Colon Cabrera v. Caribbean Petroleum, supra*; *Santiago v. Bobb y El Mundo, Inc.*, 117 DPR 153 (1986). Rule 514 of Evidence, *supra*, establishes the privilege of official information in our system.¹⁶ Among the fundamental

¹⁴ *Bhatia Gautier v. Gobernador*, 199 D.P.R. 59, 82 (2017).

¹⁵ *Id.* at 83.

¹⁶ *Id.*

categories of privileged official information is the one used by public officers during the deliberative process related to the ongoing development of public policy.¹⁷

Restricting the access to information used during the deliberative procedures “protects “against *premature disclosure* of proposed policies and decisions before they have been finally formulated or adopted.”¹⁸

PREPA’s Regulation No. 6285 from January 10, 2001, known as *Regulation for the Document Administration Program of the Electric Power Authority* (“Regulation 6285”)¹⁹, regulates PREPA’s administration of documents and defines which categories of documents are considered confidential. Pursuant to Regulation 6285, information related to the deliberative process used to implement public policy is confidential.²⁰

c. Critical Energy Infrastructure Information

Federal and Puerto Rico law and Energy Bureau include multiple provisions and recognitions of critical energy infrastructure information (CEII). Attachment 3 to the Motion includes specific information and discussion of the Authority’s CEII.

Federal and Puerto Rico law protect the confidentiality of CEII, the public disclosure of which may pose a security threat in that the information could be useful to a person or group in planning an attack on critical infrastructure. *See, e.g.*, 18 C.F.R. § 388.113, as amended by Federal Energy Regulatory Commission (FERC) Order No. 683, *Critical Energy Infrastructure Information* (issued September 21, 2006); *USA Patriot Act of 2001*, § 1016, creating the *Critical Infrastructures Protection Act of 2001*, including 42 U.S.C. § 5195c(e) (defining Critical infrastructure).

¹⁷ *Id.* at 86.

¹⁸ *Id.* at 87.

¹⁹ Duly recorded in the Puerto Rico Department of State on January 11, 2011.

²⁰ Regulation 6285, Sec. V (16).

Under the Critical Infrastructures Protection Act of 2001, the term “critical infrastructure” means “systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters.” 42 U.S.C. § 5195c(e).

In 2006, FERC Order no. 683 amended the regulations for gaining access to CEII and simplified procedures for obtaining access to CEII without increasing vulnerability of the energy infrastructure and ensuring that access to CEII does not facilitate acts of terrorism.

A utility is not required to obtain FERC or other federal government approval in order to designate information as CEII. For example, information required by FERC’s Annual Transmission Planning and Evaluation Report, Form No. 715, (“FERC No. 715”), is *de facto* considered CEII and is automatically afforded the heightened protections. FERC No. 715 requires that any transmitting utility that operates integrated (non-radial) transmission facilities at or above 100 kV must annually submit information including but not limited to: Power Flow Base Cases, Transmitting Utility Maps and Diagrams, Transmission Planning Reliability Criteria, Transmission Planning Assessment Practices, and Evaluation of Transmission System Performance. Any utility that submits the required transmission information pursuant to FERC No. 715 does so with the knowledge that, as stated in the Form’s Instructions, FERC “considers the information collected by this report to be Critical Energy Infrastructure Information (CEII) and will treat it as such.” *See also* 18 C.F.R. § 141.300(d) relating to the Form and CEII.

The Authority further states that mainland regulators typically do not require a utility that designates material as CEII to follow any process before the federal government in order to make

or support such a designation, and, further, that the regulator, in its informed discretion, can establish limits on how information that it considers CEII can be accessed.

The Energy Bureau, on numerous occasions in prior dockets has accepted the Authority's designations of material as CEII, recognizing that both federal law and Puerto Rico law support such designations when applicable. Wherefore, it is respectfully requested that the Feasibility Reports included in Exhibit B be designated as confidential, and the Energy Bureau orders they remain under seal to protect the Authority's CEII.

WHEREFORE, the Authority herein requests the Energy Bureau to accept this Motion and GRANT the Confidentiality to the Feasibility Reports included in Exhibit B of this Motion.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 9th day of April 2021.

s/ Katuska Bolaños Lugo

Katuska Bolaños Lugo

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@cnspr.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; castrodierralaw@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 9th day of April 2021.

s/ Katuska Bolaños Lugo
Katuska Bolaños Lugo

Exhibit A

Project Progress Report

March 25, 2021

To: Carlos A. Negrón Alfonso, PE, MECE, MEM
From: Randy Boyce, PE, Project Manager

Client: Puerto Rico Electric Power Authority (PREPA)
Project: Feasibility Study for Improvements to
Hydroelectrical System

B&V Project No: 407635
B&V File No: 28.0000

Report February 26, 2021 – March 25, 2021
Report 2

This report summarizes the project schedule and budget status to date, identifies milestones completed, lists major activities performed and provides a look ahead for those activities planned for the next month.

SUMMARY OF MAJOR ACTIVITIES PERFORMED

- Task 100 - Conducted weekly project meetings with PREPA.
- Task 100 – Updated Project Action Item List weekly and reviewed in project meetings.
- Task 200 - Submitted draft Site Visit memorandum (March 5, 2021). Incorporated PREPA comments and submitted final memorandum (March 11, 2021).
- Task 200 – working on the draft Generation Capacity technical memorandum.
- Task 300– Submitted Water Availability Model Review memorandum (March 19, 2021). This deliverable is not in our original scope and was provided as requested by PREPA to document our progress on this task.
- Task 500– working on the draft Frequency Response and Remote Control technical memorandum.

ACHIEVED MILESTONES

- Completed Task 202c - submitted final Site Visit memorandum.
- Completed Task 300 – submitted Water Availability Model Review memorandum.

TRACKING THE SCHEDULE

The official start date was January 13, 2021 and the project is currently on schedule to be completed by June 22, 2021 (160 calendar days). The following table summarizes the current schedule.

PREPA Feasibility Study for Improvements to Hydroelectrical System – Task	Major Milestone Scheduled Date	Major Milestone Actual Date
Task 200 - Assessment of Hydropower Facilities	Mon 4/19/21	-
• Task 201a – Draft Generation Capacity Report	Fri 3/26/21	-
• Task 201b – Final Generation Capacity Report	Mon 4/19/21	-
• Task 202c – Site Visit Memorandum	Fri 3/5/21	Fri 3/5/21
Task 300 - Review Water Availability Models	Fri 3/19/21	Fri 3/19/21
Task 400 - Review Reservoir Operation Curves	Mon 5/17/21	-
Task 500 - Evaluate Local Automation / Remote Control	Fri 5/7/21	-
Task 600 - Economic Feasibility Evaluation	Wed 5/19/21	-
Task 700 - Final Summary Report	Fri 6/18/21	-


SCHEDULED ACTIVITIES FOR NEXT MONTH

- Task 201a – Submit draft Generation Capacity technical memorandum.
- Task 201b – Incorporate PREPA comments, submit final Generation Capacity technical memorandum.
- Task 400a – Issue draft Reservoir Operation Curves technical memorandum.
- Task 500a – Issue draft Frequency Response and Remote Control technical memorandum.
- Task 600a – Issue draft Economic Feasibility report.

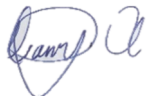
EXPENDITURES AND BUDGET BALANCE

Project Total Cost	\$469,900.00
Cost of Last Invoice	\$60,660.00
Previously Billed	\$70,485.00
Total Earned to Date	\$131,145.00
Budget Balance	\$338,755.00

This report was prepared by the following Black & Veatch personnel:



Randy Boyce - Hydro Project Manager



Dianys Arocho - Engineering Manager

ID	Task Mode	Task Name	Duration	Start	Finish	Predecessors	% Complete	Qtr 3, 2020			Qtr 4, 2020				Qtr 1, 2021			Qtr 2, 2021			Qtr 3, 2021			
								Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul				
0		PREPA Feasibility Study Schedule	113 days	Wed 1/13/21	Fri 6/18/21		50%	PREPA Feasibility Study Schedule 6/18																
1	✓	PREPA Issues Notice-to-Proceed	1 day	Wed 1/13/21	Wed 1/13/21		100%	PREPA Issues Notice-to-Proceed 1/13																
2		Task 100 - Project Management	108 days	Wed 1/20/21	Fri 6/18/21		50%	Task 100 - Project Management 6/18																
3		Task 200 - Assessment of Hydropower Facilities	64 days	Wed 1/20/21	Mon 4/19/21		91%	Task 200 - Assessment of Hydropower Facilities 4/19																
4	✓	Task 201a - Preliminary Estimates Generation Capacity - Evaluation	29 days	Mon 2/15/21	Thu 3/25/21	9	100%	Preliminary Estimates Generation Capacity - Evaluation 3/25																
5		Task 201a - Prelim Est Generation Capacity - Submit Draft TM	1 day	Fri 3/26/21	Fri 3/26/21	4	95%	Task 201a - Prelim Est Generation Capacity - Submit Draft TM 3/26																
6		Conf Call - PREPA comments Gen Cap TM	1 day	Mon 4/12/21	Mon 4/12/21	5FS+10 days	0%	Conf Call - PREPA comments Gen Cap TM 4/12																
7		Task 201b - Prelim Est Generation Capacity - Submit Final TM	5 days	Tue 4/13/21	Mon 4/19/21	6	0%	Task 201b - Prelim Est Generation Capacity - Submit Final TM 4/19																
8	✓	Task 202a - Review Site Data	13 days	Wed 1/20/21	Fri 2/5/21	1SS+5 days	100%	Task 202a - Review Site Data 2/5																
9	✓	Task 202b - Site Inspections (all 10 sites)	5 days	Mon 2/8/21	Fri 2/12/21	1SS+18 days	100%	Task 202b - Site Inspections (all 10 sites) 2/12																
10	✓	Task 202c - Site Visit Memorandum	15 days	Mon 2/15/21	Fri 3/5/21	9	100%	Task 202c - Site Visit Memorandum 3/5																
11																								
12	✓	Task 300 - Review Water Availability Models	15 days	Mon 3/1/21	Fri 3/19/21	4SS+10 days	100%	Task 300 - Review Water Availability Models 3/19																
13																								
14		Task 400 - Review Reservoir Operation Curves	41 days	Mon 3/22/21	Mon 5/17/21		19%	Task 400 - Review Reservoir Operation Curves 5/17																
15		Task 400a - Rvw Reservoir Operation Curves - Evaluation	24 days	Mon 3/22/21	Thu 4/22/21	12	25%	Task 400a - Rvw Reservoir Operation Curves - Evaluation 4/22																
16		Task 400a - Rvw Rsvr Operation Curves - Submit Draft TM	1 day	Fri 4/23/21	Fri 4/23/21	15	0%	Task 400a - Rvw Rsvr Operation Curves - Submit Draft TM 4/23																
17		Conf Call - PREPA comments to Rsvr Op Curves Draft TM	1 day	Mon 5/10/21	Mon 5/10/21	16FS+10 days	0%	Conf Call - PREPA comments to Rsvr Op Curves Draft TM 5/10																
18		Task 400b - Rvw Rsvr Operation Curves - Submit Final TM	5 days	Tue 5/11/21	Mon 5/17/21	17	0%	Task 400b - Rvw Rsvr Operation Curves - Submit Final TM 5/17																
19																								
20		Task 500 - Evaluate Frequency Response / Remote Control	45 days	Fri 3/5/21	Thu 5/6/21		47%	Task 500 - Evaluate Frequency Response / Remote Control 5/6																
21		Task 500a - Freq Response/Remote Cntl - Evaluation	25 days	Fri 3/5/21	Thu 4/8/21	9FS+14 days	65%	Task 500a - Freq Response/Remote Cntl - Evaluation 4/8																
22		Task 500a - Freq Response/Remote Cntl - Submit Draft TM	1 day	Fri 4/9/21	Fri 4/9/21	21	25%	Task 500a - Freq Response/Remote Cntl - Submit Draft TM 4/9																
23		Conf Call - PREPA comments to Freq Response/Remote Cntl	1 day	Mon 4/26/21	Mon 4/26/21	22FS+10 days	0%	Conf Call - PREPA comments to Freq Response/Remote Cntl 4/26																
24		Task 500b - Freq Response/Remote Cntl - Submit Final TM	8 days	Tue 4/27/21	Thu 5/6/21	23	0%	Task 500b - Freq Response/Remote Cntl - Submit Final TM 5/6																
25																								
26		Task 600 - Economic Feasibility Evaluation	38 days	Mon 3/29/21	Wed 5/19/21		0%	Task 600 - Economic Feasibility Evaluation 5/19																
27		Task 600a - Economic Feasibility Evaluation	19 days	Mon 3/29/21	Thu 4/22/21	5,21SS+15 da	0%	Task 600a - Economic Feasibility Evaluation 4/22																
28		Task 600a - Economic Feasibility Eval - Submit Draft Report	1 day	Fri 4/23/21	Fri 4/23/21	27	0%	Task 600a - Economic Feasibility Eval - Submit Draft Report 4/23																
29		Conf Call - PREPA comments to Economic Eval Draft Report	1 day	Mon 5/10/21	Mon 5/10/21	28FS+10 days	0%	Conf Call - PREPA comments to Economic Eval Draft Report 5/10																
30		Task 600b - Economic Feasibility Eval - Submit Final Report	7 days	Tue 5/11/21	Wed 5/19/21	29	0%	Task 600b - Economic Feasibility Eval - Submit Final Report 5/19																
31																								
32		Task 700 - Final Summary Report	29 days	Tue 5/11/21	Fri 6/18/21		0%	Task 700 - Final Summary Report 6/18																
33		Task 700 - Prepare Final Summary Report	17 days	Tue 5/11/21	Wed 6/2/21	29	0%	Task 700 - Prepare Final Summary Report 6/2																
34		Task 700 - Submit Draft Summary Report	1 day	Thu 6/3/21	Thu 6/3/21	33	0%	Task 700 - Submit Draft Summary Report 6/3																
35		Conf Call - PREPA comments on Final Summary Report	1 day	Fri 6/11/21	Fri 6/11/21	34FS+5 days	0%	Conf Call - PREPA comments on Final Summary Report 6/11																
36		Task 700 - Submit Final Summary Report	5 days	Mon 6/14/21	Fri 6/18/21	35	0%	Task 700 - Submit Final Summary Report 6/18																

Project: PREPA Feasibility Study
Date: Thu 3/25/21

Task		Project Summary			Manual Task		Start-only		Deadline
Split		Inactive Task			Duration-only		Finish-only		Progress
Milestone		Inactive Milestone			Manual Summary Rollup		External Tasks		Manual Progress
Summary		Inactive Summary			Manual Summary		External Milestone		

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Exhibit B- Feasibility Reports

TASK	TITLE	DATE	DESCRIPTION	CONFIDENTIALITY
200	Feasibility Study for Improvements to Hydro Electrical System- Task 200 Site Visit Memorandum	March 11, 2021	Memorandum on the ten hydroelectric facilities visited by the Black and Veatch team.	CEII, Trade Secret, Deliberative Process
300	Feasibility Study for Improvements to Hydro Electrical System- Task 300 Water Availability Model Review	March 19, 2021	Evaluation of hydropower potential to model the existing and potential capacity, and energy generation for each facility.	CEII
200	Feasibility Study for Improvements to Hydro Electrical System- Task 200- Installed Capacity and Average Annual Generation	March 27, 2021	Recommendations for Improvements to Hydroelectrical System.	CEII, Trade Secret, Deliberative Process

[This exhibit has been submitted under seal.]