

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

NEPR Received: May 20, 2021 8:01 PM
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IN RE: REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY’S 10-YEAR INFRASTRUCTURE PLAN – DECEMBER 2020

CASE NO.: NEPR-MI-2021-0002

SUBJECT: Request for Extension to Comply with the April 22 Order

**REQUEST FOR EXTENSION OF TIME TO SUBMIT INFORMATION
IN COMPLIANCE WITH THE APRIL 22, 2021 ORDER**

APPEARING before the Public Service Regulatory Board Energy Bureau (“Energy Bureau”), the Puerto Rico Electric Power Authority (PREPA), through its counsels of record, and respectfully submits and requests as follows:

1. On March 26, 2021, the Energy Bureau entered *Resolution and Order* regarding PREPA’s 10-Year Plan evaluation (the “March 26 Order”). In alignment with the March 26 Order, PREPA submitted on the April 14 Motion¹ a set of 185 projects at least thirty (30) calendar days prior to submittal to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency (COR3) and/or the Federal Emergency Management Agency (FEMA). The set of projects included in the April 14 Motion submission were a subset of projects, or select scope from larger projects, contained in the February version of the 10-Year Plan reviewed by Energy Bureau and referenced in the Energy Bureau’s March 26 Order.
2. On April 22, 2021, the Energy Bureau entered *Resolution and Order* (the “April 22 Order”) directing PREPA to provide required information for each of the projects included in the April 14 Motion that would be submitted to COR3 and/or FEMA under the different project categories, including but not limited to Transmission Line Projects, Transmission and Distribution Substation

¹ *Motion in Compliance with the Resolution and Order entered on March 26, 2021* filed by PREPA on April 14, 2021(the “April 14 Motion”).

Projects and Distribution System Projects on or before May 21 2021.²

3. In the April 22 Order, the Energy Bureau ordered PREPA to include a list of all the substations to be relocated in order to mitigate against possible future flooding damages, and also, listed the required information for the compliance filing to include the following:

- a. Project Description (i.e., name, location, line number, voltage level, customer count, critical load);
- b. Justification;
- c. Detailed Scope of Work;
- d. Detailed Class S Cost Estimate, broken down on the different cost items;
- e. Assessment (include all details of the existing conditions, violations to codes and standards, photos, etc.);
- f. Any Drawing, Schematic, Layout or Design;
- g. Schedule or Timeline of completion; and
- h. Any additional information PREPA may have available that may serve for an adequate evaluation.³

4. Unfortunately, at this time PREPA is not prepared to meet the established deadline and therefore respectfully requests the Energy Bureau an extension of forty-five (45) days to provide the requested detailed information on 185 projects in compliance with the April 22 Order.

5. Even though, PREPA put together a team from multiple directorates to gather the information needed to identify, address, and provide the required information; PREPA's outside expert consultant Burns & McDonnell Caribbean (Puerto Rico) P-LLC ("Burns & McDonnell"), who leads the efforts on FEMA-funded projects has not been providing professional services during the past month due to awaiting approval to an amendment of their contract. Currently, the proposed amendment to the contract is submitted for the approval of the Financial Oversight and Management Board for Puerto Rico (FOMB).

6. Even after the approval from stakeholders such as the FOMB and the Puerto Rico Public-Private Partnerships Authority (AAPP), Burns and McDonnell will need time to gather and

² April 22 Order page 3.

³ *Id.*

evaluate the required information. Accordingly, PREPA respectfully requests the Energy Bureau to grant a forty-five (45) day extension, that is until July 6, 2021, to submit the requested detailed information on the 185 projects in compliance with the April 22 Order.

WHEREFORE, the Authority herein requests the Energy Bureau to accept this Motion and to GRANT an extension of 45 days, that is until July 6, 2021, to submit the required information as ordered in the April 22 Order.

RESPECTFULLY SUBMITTED.

In San Juan Puerto Rico, this 20th day of May 2021.

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