

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

NEPR

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IN RE: PRELIMINARY STUDIES FOR
NEW COMBINED CYCLE POWER PLANT
IN PALO SECO

CASE NO.: NEPR-MI-2021-0003

SUBJECT: Request for Extension of Time to
Submit July 2021 Status Report

**REQUEST FOR EXTENSION OF TIME TO
SUBMIT JULY 2021 STATUS REPORT**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On February 1, 2021, the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) entered *Resolution and Order* opening the captioned matter and directing the Puerto Rico Electric Power Authority (the “Authority”) to, on the 15th day of each subsequent month, submit a report on the status of the development of studies for a new combined cycle gas turbine in the San Juan area (the “Order”).

2. The Authority has filed status reports for the months of February, March, April, May and June 2021 thus far.¹ The next report on the status of the development of the studies is due today, July 15, 2021. However, the Authority does not have a contract in place with the consultant retained to coordinate and complete the report required by the Order and thus, it will not be able to comply in a timely fashion.

¹ See *Motion in Compliance with Order Entered on February 1, 2021; Motion to Submit April 2021 Monthly Status Report in Compliance with the February 1st, 2021 Resolution and Order; Motion to Submit April 2021 Monthly Status Report in Compliance with the February 1st, 2021 Resolution and Order; Motion to Substitute April 2021 Status Report; Motion to Submit May 2021 Status Report in Compliance with Order Entered on February 1, 2021; and Motion to Submit June 2021 Status Report in Compliance with Order Entered on February 1, 2021.*

3. The Authority retains the services of ScottMadden, Inc. (SM) and, amongst the tasks they perform for the Authority, is the coordination and update of the report required by the Energy Bureau in the Order. SM was retained by PREPA during fiscal year 2020-2021. The Authority will retain SM's services for fiscal year 2021-2022 but, at the moment, it has not been able to obtain the necessary approvals for the execution of the new services agreement. In preparation to comply with the Order, the Authority delegated the responsibility of completing the report on a team of its officers. Said officers are working to complete the report but they have not been able to produce a final version to complete today's submittal. It is expected that the report will be completed on or before next Wednesday, July 21, 2021. Wherefore, the Authority respectfully requests the Energy Bureau to grant an extension of time until July 22, 2021, to submit the July 2021 status report in compliance with the Order.

4. The Authority files this motion and moves the Energy Bureau to grant the extension in good faith and after making reasonable efforts to comply with the Order and the deadlines established therein. It is respectfully asserted that the delay in completing the report on the status of the studies was not in the reasonable control of the Authority and that the length of the delay will not have an adverse impact in the development of the studies for a new combined cycle gas turbine in the San Juan area. It is further averred that there is no danger to prejudice to another party.

WHEREFORE, the Authority respectfully requests the Honorable Energy Bureau to grant an extension of time until July 22, 2021 to submit the July 2021 status report in compliance with the Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of July 2021.

/s Katuska Bolaños-Lugo

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