



GOVERNMENT OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD 2021 JUL 19 PM 2: 44
PUERTO RICO ENERGY BUREAU

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

CASE NO. NEPR-AP-2018-0004

SUBJECT: Evidentiary Hearing Format
and Guidelines; Appointment of Hearing
Examiner

**MOTION TO REQUEST ADDITIONAL TIME TO FILE WRITTEN STATEMENT AND
TO PARTICIPATE ON UNBUNDLING HEARING**

TO THE BUREAU:

Now comes Instituto de Competitividad y Sostenibilidad Económica de Puerto Rico (ICSE) represented by appearing counsel and respectfully alleges and prays:

1. The Puerto Rico Energy Bureau (PREB) approved a Resolution and Order on Thursday July 15, 2021, notified on Friday July 16, 2021, at 9:56 am.

2. This Order and Notice established a schedule for evidentiary hearings for Monday July 19, Thursday July 20, and Wednesday July 21, 2021.

3. We have no knowledge of a prior scheduling of evidentiary hearing by PREB on such short notice.

4. The order provided:

“Each session will consist of questions directed a specific witnesses. Witnesses will not read their testimonies nor make an opening statement. All sessions will begin with questions by the Energy Bureau to the witnesses, followed by questions from intervenors and lastly questions from PREPA/LUMA. In light of the above, the Energy Bureau ORDERS intervenors to notify the Energy Bureau, on or before July 16, 2021, at 5:00 p.m., whether they intend to ask questions to each witness during the sessions established in Exhibit a of this Resolution and Order.”

5. This means that notice had to be made on the same day the order was notified.

6. During the same week the order was notified, ICES's executive director Mr. Ramón Sánchez, and ICSE's Fellow, expert, Mr. Neil Watlington, tried to enter PREB's webpage- concerning the issue of unbundling- and both were unable to do so.

7. Perhaps this, somewhat rushed, procedure is an example of why the PREB itself has expressed to be worried with the low level of stakeholders' participation in its proceedings.

8. ISCE does not want to avoid its own responsibility on the lack of knowledge of these procedures, but we believe its is a shared responsibility.

9. The sole participation of LUMA witnesses and the lack of participation of intervenors, limited of Puerto Rico Manufacturing Association and the Independent Consumer Protection Office, is the best evidence that this, really important issue proceeding, has not benefited from ample participation.

10. ICSE believes the participation of Mr. Neil Watlington will result in an enhanced proceeding, bringing fresh, professional, expert testimony to the issue of unbundling, which is an essential piece of the Puerto Rico Electric System reorganization and modernization.

Issues like wheeling, rate fixing, distributed energy development and interconnexion, mini and micro grids optimization, all depend on the unbundling proceeding results.

WHEREFORE, ICSE respectfully request to be permitted to file a written statement by Thursday July 20, 2021 and be permitted to participate in the Wednesday July 21, 2021 afternoon session.

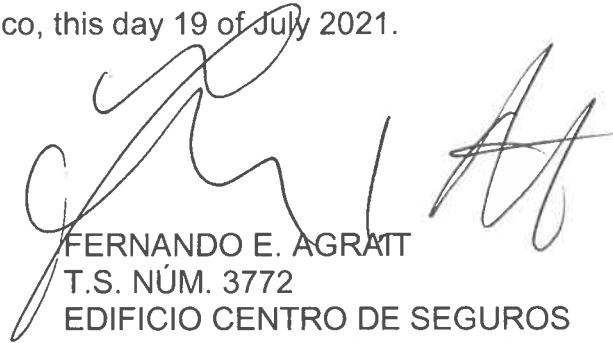
CERTIFY: I hereby certify a copy of this motion was notified by electronic mail to:

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hrivera@jrsp.pr.gov; manuelgabrielfernandez@gmail.com;

ramonluisnieves@rlnlegal.com; and ccf@tcm.law

In San Juan, Puerto Rico, this day 19 of July 2021.



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