

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

**NEPR**

**Received:**

**Sep 19, 2021**

**4:08 PM**

**IN RE:** THE IMPLEMENTATION OF THE  
PUERTO RICO ELECTRIC POWER  
AUTHORITY INTEGRATED RESOURCE  
PLAN AND MODIFIED ACTION PLAN

**CASE NO.:** NEPR-MI-2020-0012

**SUBJECT:** Motion to Clarify  
Request for Extension of Dates for  
Notification of Proponents Being  
Selected for Phase III Negotiations  
and for Submission of Pricing  
Information Per Technology Group

**MOTION TO CLARIFY REQUEST FOR EXTENSION OF DATES  
FOR NOTIFICATION OF PROPONENTS BEING SELECTED FOR  
PHASE III NEGOTIATIONS AND FOR SUBMISSION OF PRICING  
INFORMATION PER TECHNOLOGY GROUP**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. Yesterday, September 17, 2021, the Puerto Rico Electric Power Authority (PREPA) filed *Motion for Extension of Dates for Notification of Proponents Being Selected for Phase III Negotiations, for Submission of Pricing Information per Technology Group and for Additional Time to Issue the Tranche 2 RFP* (the “September 17 Motion”).

2. In the September 17 Motion, PREPA requests the Energy Bureau, among other things, that “it be given until **September 28, 2021** to communicate its Phase III selection decisions to proponents and the Energy Bureau. PREPA proposes as well that it be given until this date to submit the information related to the pricing offered per technology group selected for Phase III which the Energy Bureau has directed PREPA to file.” September 17 Motion at ¶ 11 (emphasis added). PREPA also proposed that it be given until the same date to submit the information related

to the pricing offered per technology group selected for Phase III which the Energy Bureau has directed PREPA to file. *Id.*

3. However, because of an oversight, in the “WHEREFORE” section, PREPA incorrectly asked the Puerto Rico Energy Bureau of the Public Service Regulatory Board (the “Energy Bureau”) to “grant PREPA until **September 24, 2021** to communicate its Phase III selection decisions to Tranche 1 proponents and the Energy Bureau and to submit to the Energy Bureau the information related to pricing per technology group selected for Phase III which the Energy Bureau has directed PREPA to file[.]” *Id.* at pp. 6-7 (emphasis added).

4. PREPA respectfully clarifies and submits that the request is for the Energy Bureau to grant the extension until September 28, 2021, and **not** until September 24, 2021.

WHEREFORE, the PREPA respectfully requests that the Energy Bureau (i) note the clarification made herein and (i) grant PREPA until September 28, 2021 to communicate its Phase III selection decisions to Tranche 1 proponents and the Energy Bureau and to submit to the Energy Bureau the information related to pricing per technology group selected for Phase III which the Energy Bureau has directed PREPA to file.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 19<sup>th</sup> day of September 2021.

s/ Maralíz Vázquez-Marrero  
Maralíz Vázquez-Marrero  
[mvazquez@diazvaz.law](mailto:mvazquez@diazvaz.law)  
TSPR 16,187

s/ Katuska Bolaños-Lugo  
Katuska Bolaños-Lugo  
[kbolanos@diazvaz.law](mailto:kbolanos@diazvaz.law)  
TSPR 18,888

DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.  
290 Jesús T. Piñero Ave.  
Oriental Tower, Suite 803  
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 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 to LUMA through its legal representatives at [margarita.mercado@us.dlapiper.com](mailto:margarita.mercado@us.dlapiper.com) and [laura.rozas@us.dlapiper.com](mailto:laura.rozas@us.dlapiper.com).

In San Juan, Puerto Rico, this 19<sup>th</sup> day of September 2021.

*s/ Katuska Bolaños-Lugo*  
Katuska Bolaños-Lugo