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**GOBIERNO DE PUERTO RICO
JUNTA REGLAMENTADORA DE SERVICIO PUBLICO
NEGOCIADO DE ENERGIA DE PUERTO RICO**

CASO NUM.: NEPR-MI-2020-0001

RE: TARIFA PERMANENTE DE LA
AUTORIDAD DE ENERGIA ELECTRICA DE
PUERTO RICO

ASUNTO: Vista Pública

Comparece Tomás Torres, Representante de los Consumidores ante la Junta de Gobierno de la Autoridad de Energía Eléctrica.

El Negociado de Energía en Resolución y Orden del caso en cuestión el 5 de octubre de 2021 indica:

"Mediante la presente Resolución y Orden, el Negociado de Energía informa que celebrará una Vista Publica Virtual los días 18 y 19 de octubre de 2021, de 9:30 am a 5:00p.m.

El Negociado de Energía en Resolución y Orden del caso en cuestión el 15 de octubre de 2021 indica:

"El Negociado de Energía mantiene la Vista Publica Virtual a celebrarse los días 18 y 19 de octubre de 2021, de 9:30 a.m. a 5:00 p.m. El Negociado de Energía INVITA a la Vista Publica Virtual ... al Representante del Consumidor ante la Junta de Gobierno de la Autoridad y a todas las personas interesadas, a que, de estimarlo pertinente, presenten documentos, testimonio, comentarios y /o sugerencias en cuanto a los a aquellos asuntos que son objeto de la evaluación que lleva a cabo el Negociado de Energía."

Por la presente, se aneja ponencia relacionada al tema en cuestión.

Presentado por, en San Juan Puerto Rico, lunes 18 de octubre de 2020,



Tomás J. Torres

Representante de los Consumidores
Junta de Gobierno AEE

XC: Archivos

**Ponencia Tomás J. Torres Placa
Representante de los Consumidores, Junta de Gobierno de la
Autoridad de Energía Eléctrica**

**Ante el
Negociado de Energía de Puerto Rico**

**Vista Pública, Tarifa Permanente de la
Autoridad de Energía Eléctrica, NEPR-MI-2020-0001**

18 de octubre de 2021

Introducción

El Negociado de Energía según la Resolución Final y Orden del caso CEPR-AP-2015-0001, Revisión de Tarifas de la Autoridad de Energía Eléctrica de Puerto Rico de 10 de enero de 2017¹ determinó realizar trimestralmente el ajuste por concepto de compra de combustible (FCA por sus siglas en inglés), compra de energía (PPCA por sus siglas en inglés) y subsidio de combustible (FOS por sus siglas en inglés); y realizar anualmente el ajuste por concepto de la contribución en lugar de impuestos (CELI), subsidios de interés social y alumbrado público (SUBA-HH), y otros subsidios (SUBA-NHH).

Como parte del Listado de Directrices en la Resolución Final y Orden en el párrafo 89 se indica:

"Todos los costos de combustible y compra de energía serán cobrados mediante las cláusulas adicionales, cero mediante tarifas base."

Además, dentro párrafo 90 se indica:

¹ Resolución y Orden Final del caso CEPR-AP-2015-0001, Revisión de Tarifas de la Autoridad de Energía Eléctrica de Puerto Rico de 10 de enero de 2017 <https://energia.pr.gov/wp-content/uploads/sites/7/2017/04/31-marzo-2017-Resolucion-Final-y-Orden-ver-si%C3%B3n-esp%C3%A1ol-CEPR-AP-2015-0001-1.pdf>

"90. Las cláusulas de ajuste se actualizarán trimestralmente. La Autoridad incluirá una disposición de aceleración que se activará ante una determinación por la Comisión de que la diferencia combinada entre los costos proyectados y los ingresos proyectados para las ACC, ACE y el ajuste por eficiencia energética en el trimestre corriente excede los \$20 millones."

Por lo tanto, según la Resolución Final y Orden del Caso de Revisión de Tarifas de la Autoridad de Energía Eléctrica (AEE), aún vigente, se establece que todos los costos de combustible y compra de energía serán cobrados trimestralmente por la AEE. Si existiera una diferencia en la reconciliación de los costos y los ingresos proyectados por concepto de ajuste de combustible y ajuste de compra de energía por más de \$20 millones, el Operador del sistema (anteriormente la AEE) pudiera plantear acelerar el recobro o reembolso a los consumidores para consideración del Negociado de Energía (anteriormente Comisión de Energía). No obstante, el Negociado no está obligado a aceptar dicho planteamiento.

Sin embargo, antes de solicitar un ajuste que implique costos adicionales a los consumidores en su factura mensual, se deben de agotar todas las alternativas posibles conducentes a evitar dicho ajuste. Las entidades envueltas en el ámbito de operación del sistema eléctrico, i.e. la AEE y el Operador (Luma Energy) no deben de limitarse a ofrecer un análisis trimestral del costo de combustible, compra de energía y demás ajustes incluidos en la Resolución Final y Orden de 2017, y su impacto en el costo de electricidad. Estas entidades deben proveer alternativas dirigidas a implementar soluciones para abaratar y estabilizar los costos de combustible. Por otra parte, el regulador, el Negociado de Energía, debe establecer los análisis y procesos de las alternativas propuestas por la AEE y el Operador conducentes a estabilizar el costo de combustible. En caso en que la AEE y el Operador no provean alternativas para abaratar y estabilizar los costos de combustible, el Negociado debe requerir las mismas.

A continuación, presento para consideración del Negociado alternativas para mitigar aumentos en la factura mensual como resultado del ajuste trimestral por concepto de compra de combustible y compra de energía.

Instaurar un Fondo Estatal de Estabilización del Sistema Eléctrico

El Negociado en la Resolución Final y Orden de 10 de enero de 2017, en el párrafo 312, describe la determinación de tarifas en el caso en cuestión de la siguiente manera:

"312. Fijar las tarifas conlleva dos pasos principales: Asignar la responsabilidad por el requisito de ingreso de la Autoridad entre las principales clases de clientes, y luego diseñar las tarifas que pagarán los clientes individuales dentro de cada clase." (Subrayado añadido).

La asignación de la responsabilidad de requisito de ingreso se describe como sigue:

"313. La asignación de ingresos divide la responsabilidad por el requisito de ingreso de una utilidad entre las clases de clientes. El primer paso en la asignación de ingresos, por lo tanto, es dividir a los clientes en clases. La Autoridad, como muchas utilidades, utiliza las siguientes clases amplias de clientes:

Residencial	Agrícola
Comercial	Alumbrado público
Industrial	Otras autoridades públicas"

El diseño tarifario se describe:

“335. Habiendo asignado ingresos (y el aumento en ingresos) a cada clase, la Comisión debe determinar cómo esos ingresos serán cobrados a los clientes en cada clase. Ése es el propósito del diseño tarifario.”

Las cláusulas adicionales (“riders”) se describen de la siguiente forma:

“374. Para algunos o todos los componentes del requisito de ingreso, los reguladores pueden utilizar cláusulas adicionales para recuperar los costos separadamente de todos los demás costos. La Autoridad propone cláusulas especiales para el combustible, la compra de energía, la CELI y una serie de costos y descuentos denominados conjuntamente como ‘subsídios’.”

El sistema tarifario en la Resolución Final y Orden del Negociado de Energía de 2017, al igual que por lo general se hace en utilidades reguladas, se basa en una tarifa que recobra los costos de la AEE. De lo contrario, si la AEE no cubre todos sus gastos por medio de la tarifa u otros mecanismos como la aplicación de seguros y fondos de mitigación de emergencia, por ejemplo, Fondos FEMA, entre otros, se crearía un escenario de posible insolvencia por parte de la AEE, como el que la llevó a radicar quiebra.

Dentro de mis funciones como miembro de la Junta de Gobierno de la AEE, durante el mes de octubre de 2020 solicité a la Junta de Gobierno incluir de manera permanente en la página web de la AEE un informe de todos los balances adeudados de cada agencia y entidad gubernamental. Esta información se comenzó a publicar en la página web de la AEE desde el mes de enero de 2021². El informe consistió en un listado de las deudas actualizadas de agencias estatales y federales, corporaciones públicas y municipios.

² Informes Balances Adeudados <https://aeepr.com/es-pr/QuienesSomos/Paginas/BalancesAdeudados.aspx>

El último informe se publicó en abril de 2021. A esta fecha la AEE reflejaba los siguientes balances adeudados por agencias, corporaciones públicas y municipios:

- Agencias Federales:	\$ 6,897,820
- Agencias Estatales:	\$ 14,295,453
- Corporaciones Públicas:	\$176,265,234
- Municipios:	\$ 36,269,056
Total	\$233,727,563

Por lo tanto, **la AEE debe implementar un programa para el cobro de estos balances adeudados. Los fondos recaudados se deben utilizar para la creación de un fondo de estabilización del sistema eléctrico de Puerto Rico**, para cubrir gastos extraordinarios de la operación y mantenimiento del sistema que tengan incidencia en la factura de los consumidores. Además, dado la magnitud de estas cantidades, el Negociado de Energía debe de evaluar los procesos de la AEE para el recobro de estos fondos.

Otra posible fuente de ingresos dirigida a instaurar un fondo de estabilización es realizar una reevaluación del Acuerdo de Servicios Compartidos ("Shared Services Agreement") con Luma Energy como parte del Acuerdo de Operación y Mantenimiento para el Sistema de Transmisión y Distribución. La AEE puede determinar qué partes del Acuerdo de Servicios Compartidos se pueden realizar con personal existente o con un mínimo de personal suplementario, utilizando empleados que fueron relocalizado a agencias gubernamentales como parte de la implementación del contrato de Luma Energy.

Estabilizar el Costo de Energía por Fluctuaciones en el Costo de Combustible a Nivel Internacional

Una alternativa que requiere discusión y evaluación es la compra de combustible a largo plazo, con el fin de evitar picos en costos, bien sea por el efecto de la temporada (generalmente causado por los cambios en consumo en verano e invierno) o por otras razones relacionadas a geopolítica y aspectos de índole económico. Como mencionado anteriormente en esta ponencia, las entidades envueltas en el ámbito de operación del sistema eléctrico, i.e. la AEE y Luma Energy no deben de limitarse a ofrecer un análisis trimestral del costo de combustible, compra de energía y demás ajustes incluidos en la Resolución Final y Orden de 2017, y su impacto en el costo de electricidad. Estas entidades deben proveer alternativas dirigidas a implementar soluciones para abaratar y estabilizar los costos de combustible. Por otra parte, el regulador, el Negociado de Energía, debe establecer los análisis y procesos de las alternativas propuestas por la AEE y el Operador conducentes a estabilizar el costo de combustible, hasta culminar la transición a fuentes renovables como establecido en la ley 17 de 2019. En caso en que la AEE y el Operador no provean alternativas para abaratar y estabilizar los costos de combustible, el Negociado debe requerir las mismas.

En la Reunión de la Junta de Gobierno de la AEE del mes de junio solicité a la Junta de Gobierno evaluar alternativas con relación a este tema. A raíz de mi solicitud, la AEE está evaluando opciones para implementar herramientas dirigidas a estabilizar las fluctuaciones en costos de energía.

El Negociado de Energía debe también reevaluar el término dentro del cual se ajusta el costo de compra de combustible y compra de energía³. El Negociado

³ La Resolución y Orden del Negociado de Energía de Puerto Rico del 10 de enero de 2017, en torno al proceso de Revisión de las Tarifas de la AEE, establece que los costos de combustible y compra de energía serán cobrados mediante cláusulas adicionales, y que estas cláusulas de ajuste se actualizarán trimestralmente - *Revisión de las Tarifas de la Autoridad de Energía Eléctrica de Puerto Rico. Resolución Final y Orden*. Enero 2017. Ver párrafos 377 y 388 en páginas 148 y 149 de la orden. <https://energia.pr.gov/wp-content/uploads/sites/7/2017/04/31-marzo-2017-Resolucion-Final-y-Orden-ver-si%C3%B3n-esp%C3%A1ol-CEPR-AP-2015-0001-1.pdf>

debe modificar el proceso de actualización de las cláusulas de ajuste para llevarlo a cabo cada seis meses, en lugar de trimestralmente como en la actualidad. De esta manera se provee una mayor certeza, y estabilidad de costos.

Temas y Procesos Adicionales Relacionados al Costo de Energía

Otros procesos vinculados al costo de energía de los consumidores, adicionales a este proceso (NEPR-MI-2020-0001) los son:

Transbordo de Energía, “The Unbundling of The Assets Of The PREPA”, NEPR-AP-2018-0004

Este proceso facilita la implantación del Transbordo de Energía, mediante la determinación de una tarifa desagregada (“unbundled tariff”). Según el Reglamento de Transbordo de Energía 9138 (“Regulation on Electric Energy Wheeling”)⁴, vigente, este tiene el objetivo de implementar un sistema que permita a **empresas exentas, empresas de servicios de energía eléctrica, microrredes, cooperativas de energía, empresas municipales, a consumidores industriales y comerciales, y a “Community Solar” y a otros agregadores de demanda** participar en el mecanismo de Trasbordo de Energía en Puerto Rico. En otras palabras, la implementación del Transbordo de Energía, que incluye el establecimiento de una tarifa desagregada (“unbundled tariff”), permite a los diferentes tipos de consumidores la alternativa de adquirir energía a otras entidades en adición de la AEE, utilizando de la infraestructura de transmisión y distribución, perteneciente a la corporación pública, existente en la isla.

El establecimiento del Transbordo de Energía no solo provee opciones adicionales de compra de energía a los consumidores, sino que resulta en la incorporación de nuevas fuentes de energía, y nueva generación y

⁴ Regulation on Electric Energy Wheeling

<http://app.estado.gobierno.pr/ReglamentosOnLine/Reglamentos/9138ING.pdf>

almacenamiento de energía, en cumplimiento con la nueva política energética le Puerto Rico, Ley 17 de 2019. Esto además produce una presión de mercado a la AEE, al incorporar productores de energía diferentes a ésta⁵.

En otras palabras, siempre que, por presiones externas del mercado u otras razones, la AEE opere con menores costos su flota de generación, esto resulta en un impacto en la tarifa de electricidad. Estos ajustes en costos operacionales pueden ser como resultado de: (1) costos de combustible y (2) el tipo de unidad utilizada en la generación de energía. En la medida que la AEE desarrolle estrategias en estas dos áreas, disminuye sus costos, lo cual se refleja en la tarifa de electricidad mediante los ajustes trimestrales.

También, el Negociado debe de considerar el impacto en reducción en costos operacionales de la AEE que resulta de la integración nueva generación y almacenamiento de energía al sistema eléctrico de Puerto Rico por medio del Transbordo de Energía. En particular, el Negociado debe de determinar la generación de la AEE a ser puesta fuera de servicio al integrar nueva generación como resultado del Transbordo.

Además de lo expuesto anteriormente, al establecer las tarifas desagregadas ("unbundled tariffs"), el Negociado debe de considerar el testimonio de Ralph Zarumba and Eugene Granovsky, de Navigant Consulting, del 27 de mayo de 2016⁶. Dentro de este testimonio establecen tarifas desagregadas ("unbundled tariffs") para la mayoría de las tarifas de la AEE.

⁵ Como descrito anteriormente, el sistema tarifario en la Resolución Final y Orden del Negociado de Energía de 2017, se basa en una tarifa que recobra los costos de la AEE. Sin embargo, al existir otros productores de energía la AEE se obliga a mantener una eficiencia operacional dirigida a no incurrir en costos que resulten en aumentos en costos, en especial costos operacionales relacionados a los ajustes trimestrales.

⁶ Ralph Zarumba Director, Navigant Consulting, Inc. Eugene Granovsky Managing Consultant, Navigant Consulting. <https://energia.pr.gov/wp-content/uploads/sites/7/2016/07/PREPA-Ex.-4.0-Zarumba-Granovsky-Signed.pdf>

"Performance Targets for LUMA Energy Servco, LLC", NEPR-AP-2020-0025

Dentro de este proceso el Negociado debe considerar el establecimiento de métricas de desempeño relacionadas a ahorros en los costos de operación. Si se asume que el Operador puede operar con menores costos que la AEE, como indicado en documentos publicados por la Autoridad para las Alianzas Público Privadas durante el proceso relacionado al Contrato de Alianza para la Operación y Mantenimiento del Sistema de Transmisión y Distribución de Puerto Rico, debe existir una métrica donde se muestre el cumplimiento con estos ahorros. De lo contrario, no habría forma de comprobar eficiencias y ahorros operacionales.

En el documento “Autoridad para las Alianzas Público-Privadas, Hoja de Datos, APP con LUMA Energy para la Transformación del Sistema de Transmisión y Distribución de Energía Eléctrica”⁷ se establece:

“Transacción T&D en Números

...

Proyección Promedio de Ahorros Operacionales Anuales Durante la Primera Mitad del Período, \$169 millones,

- Ahorros de 27% mayores que el promedio de Cargo por Servicio anual para el período.
- Ahorros netos acumulados de \$323 millones tras el pago de Cargo por Servicio.” (Formato y subrayado añadido).

Por lo tanto, el Negociado debe de considerar métricas de desempeño relacionadas a ahorros operacionales. Estos ahorros, al materializarse, deben

⁷ PREPA T&D Transaction Highlights <https://www.p3.pr.gov/wp-content/uploads/2020/07/prepa-td-transaction-highlights.pdf>

incorporarse al presupuesto de la AEE o de Luma Energy. De esta manera se pueden evitar alzas en la tarifa en caso de que se requiera el uso de fondos por encima de lo presupuestado.

Agradezco la oportunidad de participar en este proceso de vista pública y estoy listo para responder a sus preguntas.

Anejos

1. Autoridad de Energía Eléctrica. Resumen Informe Mensual de Balances Adeudados Corporaciones Públicas, Agencias y Municipios. Abril 2021.
2. Navigant Consulting, Inc. a Nombre de la Autoridad de Energía Eléctrica. "The Puerto Rico Electric Power Authority, Initial Rate Review Case No. CEPR-AP-2015-0001, PREPA Ex. 4.0, Direct Testimony of Ralph Zarumba Director, Navigant Consulting, Inc. Eugene Granovsky Managing Consultant". Mayo de 2016.
3. Autoridad para las Alianzas Público-Privadas. Hoja de Datos, APP con LUMA Energy para la Transformación del Sistema de Transmisión y Distribución de Energía Eléctrica.

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS FEDERALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS FEDERALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
7781972000	U.S. COAST GUARD	359,158.23	4,042,382.23	147,826.98	4,114,075.18	136,517.12	4,473,233.41	\$ 4,251,492.94
4137790000	U.S. ARMY RESERVE	806,946.64	167,426.65	104,234.06	123,016.20	148,644.51	929,962.84	\$ 773,611.75
4037790000	U.S. VETERANS ADM. CENTER	13,639.45	722,747.63	918,303.08	902,166.11	738,884.60	915,805.56	\$ -
2039142000	U.S. NAVY SALINAS ING. AREA	481,890.00	105,018.17	38,534.41	143,552.58	-	625,442.58	\$ 567,640.97
7037790000	HIGH SCHOOL CROWN / Ramey School	636,126.58	-60,004.53	38,384.64	-21,619.89	-	614,506.69	\$ 556,929.73
5237790000	U.S. ARMY GARRISON	0.00	851,729.56	457,060.32	493,697.10	815,092.78	493,697.10	\$ -191,893.38
4817790000	FORCE SURVEILLANCE SUPPORT	354,229.04	94,921.37	101,604.91	100,692.35	95,833.93	454,921.39	\$ -
1717790000	US POSTAL SERVICE	-0.00	405,792.84	211,267.48	440,369.93	176,690.39	440,369.93	\$ 123,468.71
307790000	FDIC (EUROBANK)	259,587.76	-	-	-	-	259,587.76	\$ 259,587.76
0581972000	GENERAL SERVICES ADMINISTRATION	242,741.09	14,705.68	-	14,705.68	-	257,446.77	\$ -
Subtotal "TOP 10"		3,154,318.79	6,344,719.60	2,017,215.88	6,310,655.24	2,111,663.33	9,464,974.03	6,340,838.48
8281972000	DEPARTMENT AIR FORCE	159,400.17	-	-	-	-	159,400.17	\$ -
5929142000	FEDERAL BUREAU PRISONS	-0.00	140,767.92	147,471.57	147,471.57	140,767.92	147,471.57	\$ -73,735.79
USNSG	U.S. NAVAL SEC. GROUP	123,065.98	-	-	-	-	123,065.98	\$ 123,065.98
7427790000	U.S. FOREST SERVICE	25,821.90	80,706.72	14,272.04	94,978.76	-	120,800.66	\$ 99,392.60
3049142000	TROPICAL AGRICULTURAL RESEARCH ST.	58,902.42	19,365.36	8,693.40	28,058.76	-	86,961.18	\$ 73,921.08
3119142000	SAN JUAN LABORATORIES(CENTER FOR DI	-0.00	75,532.75	40,036.35	81,222.91	34,346.19	81,222.91	\$ 21,168.39
6381972000	FEDERAL AVIATION AGENCY	534,485.53	-455,567.59	-	-455,567.59	-	78,917.94	\$ 78,917.94
1149142000 / 067	U.S. INMIGRA. & NATUR. SERV. / DHS/ICE	51,944.34	14,196.83	-	14,196.83	-	66,141.17	\$ 66,141.17
6337790000	U.S. CUSTOMS SERVICE - CMC	35,201.40	-6,440.09	30,997.06	24,556.97	-	59,758.37	\$ 13,262.78
652779000	U.S. DEPT INT/FISH,WILDLIFE SER.	40,906.77	11,701.22	6,244.09	12,068.93	5,876.38	52,975.70	\$ 43,609.57
Subtotal "TOP 20"		1,029,728.51	-119,736.88	247,714.51	-53,012.86	180,990.49	976,715.65	445,743.72

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS FEDERALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS FEDERALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
4239142000	U.S. FOOD & DRUG ADMINISTRATION	0.00	22,955.76	17,045.19	40,000.95	-	40,000.95	\$ 14,433.17
5117790000	HIDTA	22,056.11	-4,254.32	20,523.43	16,269.11	-	38,325.22	\$ -
4427790000/ 5377	U.S. CUSTOMS-CARIBBEAN / DHS ICE HSI S	122,479.44	-89,033.99	11,219.07	-87,253.74	9,438.82	35,225.70	\$ 18,397.10
1427790000	U.S. CORPS. OF ENGINEERS	28,628.20	2,251.87	2,654.63	4,906.50	-	33,534.70	\$ 29,552.76
9846296044	U.S. POST OFFICE	-51,255.35	107,876.34	30,075.04	81,330.39	56,620.99	30,075.04	\$ -15,037.52
9237790000	U.S. ARMY NAT. CEMETERY(DEPARTMENT C)	0.00	22,082.18	3,805.28	25,887.46	-	25,887.46	\$ 20,179.54
USACOE	U.S. ARMY CORPS. OF ENG. Inactive	25,106.95	-	-	-	-	25,106.95	\$ -
1349142000	USAF TARS	6,292.08	11,418.58	5,954.43	11,498.82	5,874.19	17,790.90	\$ -
3117790000	DHS, USCPB, NLC-LAGUNA	0.00	17,189.24	9,732.54	17,608.45	9,313.33	17,608.45	\$ 3,009.64
FHA	FEDERAL HOUSING ADM.	16,862.90	-	-	-	-	16,862.90	\$ 16,862.90
3307790000	U.S. DEPT. OF AGRICULTURE	-0.00	16,360.94	16,668.89	16,606.22	16,423.61	16,606.22	\$ -8,397.12
8527790000	SAN JUAN NATIONAL HISTORIC SITE	0.00	17,048.02	11,250.01	11,250.01	17,048.02	11,250.01	\$ -5,625.01
9971972000	U.S. ARMY CORPS. OF ENG.	8,246.69	-	-	-	-	8,246.69	\$ 8,246.69
USMS	U.S. MARSHALL SERVICE inactive	7,501.52	-	-	-	-	7,501.52	\$ 7,501.52
8381972000	FBI	6,526.42	-	-	-	-	6,526.42	\$ 6,526.42
USDC	U.S. DEPT. COMM. (B.C.)	6,246.00	-	-	-	-	6,246.00	\$ 6,246.00
8827790000	U.S. WEATHER BUREAU	0.00	6,252.35	5,896.91	5,896.91	6,252.35	5,896.91	\$ -2,948.46
0827790000	PONCE VETERANS CENTER	0.28	5,289.38	-	5,289.38	-	5,289.66	\$ -
SSS	SELECTIVE SERVICE SYSTEM	4,187.36	-	-	-	-	4,187.36	\$ 4,187.36
1139142000	FEDERAL COMMUNICATIONS COMM	6,460.32	-1,885.28	143.87	-2,328.34	586.93	4,131.98	\$ 3,916.18
4354014781	U.S. INMIGRATION AND CUSTOMS ENFORC	18,854.11	-15,081.85	4,040.07	-14,814.04	3,772.26	4,040.07	\$ -
3917790000	U.S. POSTAL INSPECTION SERVICE	0.00	2,034.18	2,546.23	2,546.23	2,034.18	2,546.23	\$ -

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS FEDERALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS FEDERALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
6149142000	SOIL CONSERVATION OF.	4,441.29	-3,259.23	1,306.62	-1,952.61	-	2,488.68	\$ 528.75
7681972000	USDA FARM SERV. AGENCY	1,785.32	-	-	-	-	1,785.32	\$ 1,785.32
1219142000	SAN JUAN OBSERVATORY	-0.00	650.82	870.13	1,520.95	-	1,520.95	\$ -
4939142000	ARECIBO VET CENTER	1,375.23	-244.35	786.75	-61.68	604.08	1,313.55	\$ 133.43
MCRU	MARINE CORP. RESERVE UNIT	1,136.60	-	-	-	-	1,136.60	\$ 1,136.60
3381972000	DEPARTMENT OF THE ARMY	233.94	-	-	-	-	233.94	\$ 233.94
USGS	U.S. GEOLOGICAL SURVEY	149.03	-	-	-	-	149.03	\$ 149.03
USNWPS	U.S. NAVY WATER PUMP STATION	147.59	-	-	-	-	147.59	\$ 147.59
7871972000	COSSMA	-	72.22	-	72.22	-	72.22	\$ 72.22
CGSF	COAST GUARD STA. FAJARDO	-	-	-	-	-	-	\$ -
7981972000	IONOSPHERIC (CORNELL UNIV.)	-	-	-	-	-	-	\$ -
OCRF	OFICINA COMISIONADO RESIDENTE	-0.00	-	-	-	-	-	\$ -
381972000	ROOSEVELT ROADS CEIBA	0.00	-	-	-	-	-	\$ -
INACTIVA	U.S. MARSHAL SERVICES	-	-	-	-	-	-	\$ -
2781972000	UPR CENTRO DE INVESTIGACION DE DESA	0.00	-	-	-	-	-	\$ -
971972000	RURAL DEVELOPMENT	-344.96	-	-	-	-	-344.96	\$ -
2917790000	EL YUNQUE NATIONAL FOREST	-81,352.91	2,863.89	552.73	3,416.62	-	-77,936.29	\$ -
91972000	FEDERAL EMERGENCY MANAGEMENT AGE	10,611.83	-97,327.83	-	-97,327.83	-	-86,716.00	\$ -
Subtotal		166,375.98	23,258.92	145,071.82	40,361.98	127,968.76	206,737.97	111,238.04
GRAN TOTAL		\$ 4,350,423.28	\$ 6,248,241.64	\$ 2,410,002.21	\$ 6,298,004.36	\$ 2,420,622.58	\$ 10,648,427.65	\$ 6,897,820.23

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS ESTATALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS ESTATALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
5329142000	DEPARTAMENTO DE EDUCACIÓN	\$ 22,951,156.76	\$ -12,327,834.59	\$ 7,266,804.78	\$ 17,890,126.95	\$ 940,782.00	\$ 16,949,344.95	\$ 9,682,540.17
7462228029	SUPERINTERDENCIA DEL CAPITOLIO	\$ 1,965,298.54	\$ 1,407,005.82	\$ 168,115.53	\$ 3,540,419.89	\$ -	\$ 3,540,419.89	\$ 3,172,046.24
3239142000	ADM. DE LOS TRIBUNALES	\$ -593,380.39	\$ 1,169,287.95	\$ 644,816.20	\$ 1,220,723.76	\$ 15,586.36	\$ 1,205,137.40	\$ 194,911.61
8337790000	DEPARTAMENTO DE SALUD -HOSP. UNIVERSITARIO	\$ 1,277,315.27	\$ -1,024,932.86	\$ 283,101.12	\$ 535,483.53	\$ -	\$ 535,483.53	\$ 252,382.41
6819142000	DEPARTAMENTO TRANS. Y OBRAS PÚBLICAS	\$ 629,622.98	\$ -265,800.67	\$ 125,342.46	\$ 489,164.77	\$ -	\$ 489,164.77	\$ 216,849.96
4178142000	DEPARTAMENTO DE RECURSOS NATURALES	\$ 4,993,625.77	\$ -4,685,993.27	\$ 112,659.34	\$ 420,291.84	\$ -	\$ 420,291.84	\$ 245,785.80
3029142000	AMSSCA	\$ 1,021,030.64	\$ -592,694.96	\$ 250,090.73	\$ 678,426.41	\$ 407,466.80	\$ 270,959.61	\$ 20,868.88
1809142000	GUARDIA NACIONAL DE P. R.	\$ 400,364.76	\$ -259,891.83	\$ 312,914.46	\$ 453,387.39	\$ 222,380.88	\$ 231,006.51	\$ -
3129142000	CUERPO DE BOMBEROS DE P.R.	\$ -58,997.87	\$ 211,410.82	\$ 70,039.62	\$ 222,452.57	\$ -	\$ 222,452.57	\$ 152,412.95
2978142000	COMISIÓN ESTATAL ELECCIONES	\$ -131,841.52	\$ 190,618.79	\$ 136,203.75	\$ 194,981.02	\$ -	\$ 194,981.02	\$ 58,777.27
ubtotal "TOP 10"		\$ 32,454,194.94	\$ -16,178,824.80	\$ 9,370,087.99	\$ 25,645,458.13	\$ 1,586,216.04	\$ 24,059,242.09	\$ 13,996,575.29
2719142000	DEPARTAMENTO DE SALUD-SERVICIOS ADMINISTRATIVOS	\$ 4,904,361.50	\$ -5,387,579.98	\$ 646,998.43	\$ 163,779.95	\$ -	\$ 163,779.95	\$ -
7829142000	CRIM	\$ 73,752.49	\$ 13,175.33	\$ 63,190.17	\$ 150,117.99	\$ -	\$ 150,117.99	\$ 86,927.82
6329142000	OFICINA PRESERVACIÓN HISTÓRICA	\$ 101,431.55	\$ -31,357.64	\$ 22,766.85	\$ 92,840.76	\$ -	\$ 92,840.76	\$ 70,073.91
5539142000	SISTEMA DE RETIRO MAESTROS	\$ -0.00	\$ 88,307.78	\$ 40,261.89	\$ 128,569.67	\$ 49,538.58	\$ 79,031.09	\$ 38,769.20
5339142000	JUNTA DE CALIDAD AMBIENTAL	\$ 56,859.28	\$ 12,667.62	\$ 14,820.05	\$ 84,346.95	\$ 25,263.86	\$ 59,083.09	\$ 28,313.92
2639142000	LOTERÍA DE PUERTO RICO	\$ 52,028.48	\$ -13,965.17	\$ 44,818.80	\$ 82,882.11	\$ 38,063.31	\$ 44,818.80	\$ -
4719142000	DEPARTAMENTO DE SALUD -PROG. ASISTENCIA	\$ 102,618.85	\$ -100,909.18	\$ 33,231.61	\$ 34,941.28	\$ -	\$ 34,941.28	\$ 1,709.67
0809142000	ESCUELA ARTES PLÁSTICAS	\$ 185,439.19	\$ -124,864.82	\$ 14,272.87	\$ 74,847.24	\$ 47,117.68	\$ 27,729.56	\$ 13,456.69
4319142000	AGENCIA ESTATAL MANEJO DE EMERGENCIAS	\$ 89,020.27	\$ -85,692.85	\$ 22,901.98	\$ 26,229.40	\$ -	\$ 26,229.40	\$ 3,327.42
9429142000	OFICINA DEL CONTRALOR	\$ -0.00	\$ 25,265.99	\$ 13,278.32	\$ 38,544.31	\$ 12,809.26	\$ 25,735.05	\$ 12,456.73
Subtotal "TOP 20"		\$ 38,019,706.55	\$ -21,783,777.72	\$ 10,286,628.96	\$ 26,522,557.79	\$ 1,759,008.73	\$ 24,763,549.06	\$ 14,251,610.65

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS ESTATALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS ESTATALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
5427790000	DEPARTAMENTO DE SALUD -PROGRAMA WIC	\$ 78,296.76	\$ -71,714.07	\$ 18,700.13	\$ 25,282.82	\$ -	\$ 25,282.82	\$ 6,582.69
1171972000	ADM. DESARROLLO SOCIO ECONÓMICO	\$ -28,343.89	\$ 52,347.20	\$ -3,485.82	\$ 20,517.49	\$ -	\$ 20,517.49	\$ 12,848.15
8817790000	JUNTA REGLAMENTADORA DE TELECOMUNICACIONES	\$ 30,389.84	\$ -13,678.23	\$ 17,946.28	\$ 34,657.89	\$ 16,711.61	\$ 17,946.28	\$ -
0017790000	JUNTA DE GOBIERNO DEL SERVICIO 911	\$ 10,859.70	\$ -7,882.37	\$ 13,343.79	\$ 16,321.12	\$ -	\$ 16,321.12	\$ 2,977.33
2817790000	CUERPO DE EMERGENCIAS MÉDICAS	\$ -0.00	\$ 10,937.47	\$ 11,426.68	\$ 22,364.15	\$ 10,937.47	\$ 11,426.68	\$ -
4729142000	ADM. SISTEMA DE RETIRO	\$ 0.00	\$ 8,798.89	\$ 9,528.79	\$ 18,327.68	\$ 8,798.89	\$ 9,528.79	\$ -
7029142000	CORPORACIÓN DESARROLLO RURAL	\$ 3,407.64	\$ 3,444.94	\$ 1,002.98	\$ 7,855.56	\$ -	\$ 7,855.56	\$ 6,852.58
7337790000	DEPARTAMENTO DE SALUD - SALUD AMBIENTAL	\$ -7,299.70	\$ 13,205.87	\$ 1,628.56	\$ 7,534.73	\$ -	\$ 7,534.73	\$ 5,906.17
3717790000	FIDEICOMISO GUARDIA NACIONAL	\$ 29,299.27	\$ -21,745.40	\$ 7,327.71	\$ 14,881.58	\$ 7,553.87	\$ 7,327.71	\$ -
0327790000	DEPARTAMENTO DE SALUD -REGISTRO DEMOGRÁFICO	\$ 1,581.05	\$ 3,239.05	\$ 1,549.37	\$ 6,369.47	\$ -	\$ 6,369.47	\$ 4,820.10
1807790000	INSTITUTO DE ESTADÍSTICAS	\$ 0.00	\$ 4,291.47	\$ 2,412.35	\$ 6,703.82	\$ 2,172.77	\$ 4,531.05	\$ 244.44
1537790000	ADM. INDUSTRIA Y EL DEPORTE HÍPICO	\$ -13,875.42	\$ 12,848.23	\$ 5,050.94	\$ 4,023.75	\$ -	\$ 4,023.75	\$ -
817790000	CONSEJO SOBRE DEFICIENCIA	\$ 2,792.74	\$ -1,312.99	\$ 639.80	\$ 2,119.55	\$ -	\$ 2,119.55	\$ 1,479.75
3907790000	OFICINA DE ETICA GUBERNAMENTAL	\$ 1,041.50	\$ 2,274.50	\$ 2,063.00	\$ 5,379.00	\$ 3,316.00	\$ 2,063.00	\$ -
9319142000	OFICINA EX-GOBERNADORES	\$ 1,290.20	\$ 429.74	\$ 25.15	\$ 1,745.09	\$ -	\$ 1,745.09	\$ 1,719.94
2939142000	OFICINA DEL PROCURADOR PARA PERSONAS DE EDAD AVANZADA	\$ 1,012.36	\$ -600.56	\$ 658.37	\$ 1,070.17	\$ -	\$ 1,070.17	\$ 411.80
8729142000	CÁMARA REPRESENTANTES	\$ -	\$ -470.95	\$ 652.97	\$ 182.02	\$ -	\$ 182.02	\$ -
6529142000	OFICINA DEL PROCURADOR DEL CIUDADANO	\$ -263.33	\$ 428.84	\$ 175.68	\$ 341.19	\$ 165.51	\$ 175.68	\$ -
4271972000	OFICINA DE SERVICIOS LEGISLATIVOS	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
1591972000	PROGRAMA DE SALUD CORRECCIONAL	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
3761972000	OFICINA COMISIONADO INSTITUCIONES FINANCIERAS	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
9339142000	JUNTA LIBERTAD BAJO PALABRA	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
817972000	ADM. PARA EL ADIESTRAMIENTO FUTUROS EMPRESARIOS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
5053847341	OFICINA COMISIONADO ASUNTOS MUNICIPALES OCAM	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS ESTATALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS ESTATALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
7291972000	OFICINA PROCURADOR DEL PACIENTE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9139142000	ADM. INSTITUCIONES JUVENILES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
FSCAJ	OFICINA SERVICIOS CON ANTELACIÓN AL JUICIO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
NSDE	NEGOCIADO SEGURIDAD DE EMPLEO	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2537790000	ADM. DERECHO AL TRABAJO	\$ -0.00	\$ -	\$ -	\$ -0.00	\$ -	\$ -0.00	\$ -
0408571308	OFICINA DEL CONTRALOR ELECTORAL	\$ -0.00	\$ -	\$ -	\$ -0.00	\$ -	\$ -0.00	\$ -
CCRCC	COMISIÓN CONJUNTA REVISIÓN CÓDIGO CIVIL	\$ -0.01	\$ -	\$ -	\$ -0.01	\$ -	\$ -0.01	\$ -
CASARH	COMISION APELATIVA SISTEMA ADM RECURSOS HUMANOS	\$ -39.53	\$ -	\$ -	\$ -39.53	\$ -	\$ -39.53	\$ -
OCR	OFICINA COMISIONADO RESIDENTE	\$ -185.45	\$ -	\$ -	\$ -185.45	\$ -	\$ -185.45	\$ -
9819142000	OFICINA PROCURADOR DEL VETERANO	\$ -1,000.00	\$ -	\$ -	\$ -1,000.00	\$ -	\$ -1,000.00	\$ -
6519142000	CONSEJO DESARRULLO OCUPACIONAL Y REC. HUM.	\$ -2,285.51	\$ -	\$ -	\$ -2,285.51	\$ -	\$ -2,285.51	\$ -
8978142000	COMISIÓN INDUSTRIAL	\$ 71,646.16	\$ -77,218.04	\$ 3,179.04	\$ -2,392.84	\$ -	\$ -2,392.84	\$ -
8049142000	INSTITUTO SERVICIOS COMUNALES	\$ -12,691.26	\$ 8,618.02	\$ 1,136.48	\$ -2,936.76	\$ -	\$ -2,936.76	\$ -
7439142000	JUNTA RELACIONES TRABAJO	\$ 1,054.46	\$ -8,181.70	\$ 2,230.08	\$ -4,897.16	\$ -	\$ -4,897.16	\$ -
3078142000	OFICINA DE LA PROCURADORA DE LA MUJER	\$ -3,000.00	\$ -9,258.41	\$ 3,078.14	\$ -9,180.27	\$ 1,025.00	\$ -10,205.27	\$ -
0039142000	CIPA	\$ -10,045.78	\$ -1,086.78	\$ 659.51	\$ -10,473.05	\$ -	\$ -10,473.05	\$ -
8717790000	ADM. SUSTENTO DE MENORES	\$ 8,625.03	\$ -39,263.59	\$ 8,740.49	\$ -21,898.07	\$ -	\$ -21,898.07	\$ -
2229142000	JOB CORPS	\$ -0.00	\$ -65,829.84	\$ 43,479.21	\$ -22,350.63	\$ -	\$ -22,350.63	\$ -
1027790000	OFICINA COMUNIDADES ESPECIALES	\$ -10,969.15	\$ -16,123.46	\$ 1,193.57	\$ -25,899.04	\$ -	\$ -25,899.04	\$ -
9419142000	SENADO DE PUERTO RICO	\$ 3,595.25	\$ -28,966.00	\$ -1,797.58	\$ -27,168.33	\$ -	\$ -27,168.33	\$ -
5817790000	DEPARTAMENTO DE LA VIVIENDA	\$ -254,155.47	\$ 134,678.72	\$ 90,828.64	\$ -28,648.11	\$ -	\$ -28,648.11	\$ -
9481972000	COMISION DESARROLLO COOPERATIVO	\$ -39,429.93	\$ -	\$ -	\$ -39,429.93	\$ -	\$ -39,429.93	\$ -
5037790000	OFICINA GERENCIA DE PERMISOS	\$ -62,521.00	\$ 17,274.76	\$ 1,731.55	\$ -43,514.69	\$ -	\$ -43,514.69	\$ -
3839142000	OFICINA ASUNTOS DE LA JUVENTUD	\$ -52,461.75	\$ 45.00	\$ 5.00	\$ -52,411.75	\$ -	\$ -52,411.75	\$ -
7449142000	DEPARTAMENTO DE ESTADO	\$ -	\$ -81,397.34	\$ 15,934.82	\$ -65,462.52	\$ -	\$ -65,462.52	\$ -

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
AGENCIAS ESTATALES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACION	AGENCIAS ESTATALES	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
1329142000	D.A.C.O.	\$ -46,341.40	\$ -34,702.57	\$ 2,720.81	\$ -78,323.16	\$ -	\$ -78,323.16	\$ -
19142000	ADM. CORRECCIÓN	\$ -1,779,950.48	\$ 475,509.37	\$ 1,218,095.60	\$ -86,345.51	\$ -	\$ -86,345.51	\$ -
9171972000	OFICINA GERENCIA Y PRESUPUESTO	\$ -105,767.00	\$ 5,260.75	\$ 13,550.84	\$ -86,955.41	\$ -	\$ -86,955.41	\$ -
9739142000	OFIC. CAPACITACION Y ASESORAMIENTO ASUNTOS LABORALES Y ADM REC. HUM.	\$ -72,056.59	\$ -27,820.37	\$ 957.66	\$ -98,919.30	\$ -	\$ -98,919.30	\$ -
9229142000	DEPARTAMENTO DE AGRICULTURA	\$ 570,643.25	\$ -449,977.17	\$ -220,455.78	\$ -99,789.70	\$ -	\$ -99,789.70	\$ -
2139142000	COMISIÓN SERVICIO PÚBLICO	\$ -123,071.12	\$ 7,898.78	\$ 966.69	\$ -114,205.65	\$ -	\$ -114,205.65	\$ -
2017790000	ACUDEM	\$ -184,378.24	\$ 310.91	\$ 24,445.85	\$ -159,621.48	\$ -	\$ -159,621.48	\$ -
5137790000	ADM. SERVICIOS GENERALES	\$ -210,571.53	\$ 38,245.79	\$ 2,693.30	\$ -169,632.44	\$ -	\$ -169,632.44	\$ -
429142000	ADM. DE FAMILIAS Y NIÑOS	\$ -176,298.63	\$ -20,999.43	\$ 5,149.32	\$ -192,148.74	\$ -	\$ -192,148.74	\$ -
8814670078	DEPARTAMENTO DE SEGURIDAD PÚBLICA (NIE)	\$ -10,835.00	\$ -199,318.42	\$ 945.78	\$ -209,207.64	\$ -	\$ -209,207.64	\$ -
9939142000	ADM. REHABILITACIÓN VOCACIONAL	\$ 54,248.60	\$ -329,891.66	\$ 62,943.96	\$ -212,699.10	\$ -	\$ -212,699.10	\$ -
3819142000	DEPARTAMENTO DEL TRABAJO Y RECURSOS HUM.	\$ 102,017.24	\$ -526,475.70	\$ 133,066.03	\$ -291,392.43	\$ -	\$ -291,392.43	\$ -
9449142000	DEPARTAMENTO DE HACIENDA	\$ 83,239.15	\$ -1,430,277.91	\$ 804,539.92	\$ -542,498.84	\$ -	\$ -542,498.84	\$ -
529142000	OFICINA DEL GOBERNADOR	\$ -696,766.28	\$ -46,841.31	\$ 69,501.21	\$ -674,106.38	\$ -	\$ -674,106.38	\$ -
6088142000	DEPARTAMENTO DE RECREACIÓN Y DEPORTES	\$ 2,520,080.92	\$ -3,083,595.24	\$ -398,115.68	\$ -961,630.00	\$ -	\$ -961,630.00	\$ -
5149142000	INSTITUTO DE CULTURA	\$ 0.00	\$ -2,052,183.95	\$ 105,175.33	\$ -1,947,008.62	\$ -	\$ -1,947,008.62	\$ -
2549142000	DEPARTAMENTO DE JUSTICIA	\$ -1,656,928.49	\$ -1,069,836.71	\$ 207,487.13	\$ -2,519,278.07	\$ -	\$ -2,519,278.07	\$ -
2717790000	DEPARTAMENTO DE LA FAMILIA SECRETARIADO	\$ -307,807.10	\$ -4,113,002.94	\$ 209,380.14	\$ -4,211,429.90	\$ -	\$ -4,211,429.90	\$ -
419142000	POLICÍA DE PUERTO RICO	\$ -6,727,857.45	\$ 795,938.16	\$ 821,888.95	\$ -5,110,030.34	\$ -	\$ -5,110,030.34	\$ -
GRAN TOTAL		\$ 28,997,631.20	\$ -34,017,404.37	\$ 13,612,611.70	\$ 8,592,838.53	\$ 1,809,689.85	\$ 6,783,148.68	\$ 14,295,453.61

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
CORPORACIONES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACIÓN	CORPORACIONES PUBLICAS	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE + AJUSTES	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
3681972000	AAA	\$ 53,888,943.99	\$ 20,531,574.70	\$ 13,961,672.57	\$ 88,382,191.26	\$ 10,998,354.85	\$ 77,383,836.41	\$ 51,423,228.20
8481972000	ADMINISTRACIÓN SERVICIOS MÉDICOS	\$ 33,427,617.21	\$ 271,842.85	\$ 358,954.83	\$ 34,058,414.89	\$ 276,787.02	\$ 33,781,627.87	\$ 33,074,669.65
4481972000	AUTORIDAD DE LOS PUERTOS	\$ 25,484,575.97	\$ -785,648.10	\$ 220,528.06	\$ 24,919,455.93	\$ 915,425.58	\$ 24,004,030.35	\$ 23,542,399.20
8491972000	ADMINISTRACIÓN DEL TREN URBANO	\$ 23,873,611.18	\$ 1,256,931.29	\$ 568,845.00	\$ 25,699,387.47	\$ 8,018,100.62	\$ 17,681,286.85	\$ 16,510,361.38
4281972000	ADMINISTRACIÓN VIVIENDA PÚBLICA	\$ 8,671,912.11	\$ 2,511,459.96	\$ 224,549.95	\$ 11,407,922.02	\$ 572,777.86	\$ 10,835,144.16	\$ 9,791,299.94
7581972000	AMA	\$ 7,959,327.98	\$ 368,838.80	\$ 45,832.75	\$ 8,373,999.53	\$ -	\$ 8,373,999.53	\$ 8,273,864.81
5981972000	AUTORIDAD CARRETERAS Y TRANSPORTACIÓN	\$ 13,060,418.97	\$ 60,226.25	\$ 232,576.86	\$ 13,353,222.08	\$ 5,221,458.07	\$ 8,131,764.01	\$ 7,899,187.15
5491972000	SERVICIOS MEDICOS UNIVERSITARIOS	\$ 7,003,256.46	\$ -198,280.59	\$ 157,103.33	\$ 6,962,079.20	\$ 201,719.41	\$ 6,760,359.79	\$ 6,437,405.35
9871972000	CORPORACIÓN CENTRO CARDIOVASCULAR DE P.R.	\$ 7,413,817.47	\$ -480,592.58	\$ 292,617.31	\$ 7,225,842.20	\$ 504,789.47	\$ 6,721,052.73	\$ 6,221,908.46
4981972000	AUTORIDAD DE DESPERDICIOS SÓLIDOS	\$ 3,337,432.79	\$ 169,133.05	\$ 76,894.95	\$ 3,583,460.79	\$ -	\$ 3,583,460.79	\$ 3,424,555.27
Subtotal "TOP 10"		\$ 184,120,914.13	\$ 23,705,485.63	\$ 16,139,575.61	\$ 223,965,975.37	\$ 26,709,412.88	\$ 197,256,562.49	\$ 166,598,879.41
3281972000	UNIVERSIDAD DE PUERTO RICO	\$ -1,552.80	\$ 2,726,215.19	\$ 740,665.16	\$ 3,465,327.55	\$ -	\$ 3,465,327.55	\$ 2,002,586.46
4581972000	AUTORIDAD DE TIERRAS	\$ 3,169,180.83	\$ 53,244.23	\$ 21,361.83	\$ 3,243,786.89	\$ 3,376.26	\$ 3,240,410.63	\$ 3,196,274.15
591972000	CORPORACIÓN FONDO SEGURO DEL ESTADO	\$ 962,387.06	\$ 612,950.67	\$ 1,504,088.05	\$ 3,079,425.78	\$ 238,254.46	\$ 2,841,171.32	\$ 930,352.83
8291972000	AUTORIDAD DISTRITO CENTRO CONVENCIONES	\$ 53,446.68	\$ 2,107,514.76	\$ 341,248.61	\$ 2,502,210.05	\$ -	\$ 2,502,210.05	\$ 1,813,585.00
O481972000	AUTORIDAD DE EDIFICIOS PÚBLICOS	\$ 1,185,347.14	\$ 101,401.86	\$ 892,539.03	\$ 2,179,288.03	\$ 335,071.42	\$ 1,844,216.61	\$ -
2181972000	U.P.R. RECINTO CIENCIAS MÉDICAS	\$ 1,513,504.84	\$ 274,832.82	\$ 503,404.15	\$ 2,291,741.81	\$ 858,634.18	\$ 1,433,107.63	\$ 451,649.19
5011767420	CENTRO COMPRENSIVO DE CÁNCER	\$ 3,546.42	\$ 797,292.76	\$ 301,119.02	\$ 1,101,958.20	\$ 271,704.57	\$ 830,253.63	\$ 529,134.61
5781972000	UPR - C.A.A.M.	\$ -2,952.49	\$ 407,496.71	\$ 440,978.34	\$ 845,522.56	\$ 404,544.22	\$ 440,978.34	\$ -
1281972000	ADMINISTRACIÓN COLEGIOS REGIONALES	\$ 0.00	\$ 235,040.37	\$ 137,639.10	\$ 372,679.47	\$ -	\$ 372,679.47	\$ 165,741.84
8781972000	COLEGIO REGIONAL ARECIBO	\$ 349,817.81	\$ -70,048.81	\$ 92,653.79	\$ 372,422.79	\$ -	\$ 372,422.79	\$ 189,014.12
Subtotal "TOP 20"		\$ 191,353,639.62	\$ 30,951,426.19	\$ 21,115,272.69	\$ 243,420,338.50	\$ 28,820,997.99	\$ 214,599,340.51	\$ 175,877,217.61

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
CORPORACIONES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACIÓN	CORPORACIONES PUBLICAS	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE + AJUSTES	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
3981972000	COMPAÑIA FOMENTO INDUSTRIAL	\$ 137,155.95	\$ 139,886.25	\$ 105,778.97	\$ 382,821.17	\$ 96,095.10	\$ 286,726.07	\$ 74,319.17
881972000	COLEGIO REGIONAL CAROLINA	\$ 16,129.21	\$ 124,087.32	\$ 72,816.84	\$ 213,033.37	\$ -	\$ 213,033.37	\$ 58,180.58
3881972000	COLEGIO UNIVERSITARIO HUMACAO	\$ -0.00	\$ 171,265.51	\$ 87,553.32	\$ 258,818.83	\$ 83,276.99	\$ 175,541.84	\$ -
1181972000	CORPORACIÓN CONSERVATORIO DE MÚSICA DE P.R.	\$ 111,262.40	\$ 40,693.59	\$ 40,804.97	\$ 192,760.96	\$ 40,693.59	\$ 152,067.37	\$ 52,663.01
O981972000	CORP. DESARROLLO DE EXPORTACIONES DE P.R.	\$ 203,924.49	\$ -89,835.38	\$ 35,928.39	\$ 150,017.50	\$ -	\$ 150,017.50	\$ 73,768.34
9781972000	COLEGIO REGIONAL BAYAMÓN	\$ -0.00	\$ 119,010.52	\$ 143,124.84	\$ 262,135.36	\$ 119,010.52	\$ 143,124.84	\$ -
7881972000	COLEGIO REGIONAL PONCE	\$ 110,454.48	\$ -23,384.11	\$ 95,256.89	\$ 182,327.26	\$ 73,146.51	\$ 109,180.75	\$ -
4081972000	INSTITUTO CIENCIAS FORENSES	\$ -0.00	\$ 8,511.42	\$ 88,139.47	\$ 96,650.89	\$ -	\$ 96,650.89	\$ -
7181972000	ACAA	\$ -0.00	\$ 121,556.18	\$ 49,148.69	\$ 170,704.87	\$ 79,401.47	\$ 91,303.40	\$ -
6781972000	COLEGIO REGIONAL AGUADILLA	\$ 4,067.93	\$ 45,739.05	\$ 39,245.02	\$ 89,052.00	\$ -	\$ 89,052.00	\$ 4,004.32
281972000	U.P.R. ADMINISTRACIÓN CENTRAL	\$ -0.00	\$ 53,659.12	\$ 30,619.79	\$ 84,278.91	\$ -	\$ 84,278.91	\$ 40,707.16
1881972000	COLEGIO UNIVERSITARIO CAYEY	\$ -0.00	\$ 87,992.08	\$ 80,554.99	\$ 168,547.07	\$ 88,619.08	\$ 79,927.99	\$ -
3781972000	CARIBBEAN PRIMATE RESEARCH	\$ 0.00	\$ 104,516.61	\$ 27,646.44	\$ 132,163.05	\$ 53,817.94	\$ 78,345.11	\$ 99.15
3591972000	AUTORIDAD TRANSPORTE MARITIMO ISLAS	\$ 1,564.61	\$ 63,698.43	\$ 11,087.94	\$ 76,350.98	\$ -	\$ 76,350.98	\$ 46,197.49
7671972000	CORPORACIÓN DE P.R. PARA LA DIFUSIÓN PÚBLICA	\$ 60,424.00	\$ 64,377.63	\$ 65,031.35	\$ 189,832.98	\$ 119,578.21	\$ 70,254.77	\$ -
1918417832	AUT PARA EL REDESARROLLO LOCAL	\$ 49,266.06	\$ -51,267.13	\$ 69,246.66	\$ 67,245.59	\$ -	\$ 67,245.59	\$ -
191972000	BANCO DESARROLLO ECONÓMICO	\$ 0.00	\$ 49,444.97	\$ 25,101.41	\$ 74,546.38	\$ 24,407.56	\$ 50,138.82	\$ -
6591972000	AUTORIDAD DEL PUERTO DE LAS AMÉRICAS (PUERTO DE PONCE)	\$ 209,451.02	\$ -164,776.57	\$ 14,661.92	\$ 59,336.37	\$ 14,520.22	\$ 44,816.15	\$ 16,743.26
8971972000	ESTACIÓN EXPERIMENTAL AGRÍCOLA	\$ 36,758.83	\$ -1,356.59	\$ 20,604.89	\$ 56,007.13	\$ 17,311.54	\$ 38,695.59	\$ 1,998.05
4181972000	SERVICIO DE EXTENSIÓN AGRÍCOLA	\$ 3,826.90	\$ 8,425.80	\$ 24,465.14	\$ 36,717.84	\$ 183.24	\$ 36,534.60	\$ 110.02
5181972000	ADMINISTRACIÓN DE SERVICIOS Y DESARROLLO AGROPECUARIO	\$ -311,142.67	\$ 192,871.86	\$ 150,851.90	\$ 32,581.09	\$ -	\$ 32,581.09	\$ -
6981972000	COMPANYA DE TURISMO	\$ -6,655.00	\$ 32,877.39	\$ 55,659.29	\$ 81,881.68	\$ 49,379.76	\$ 32,501.92	\$ -
8881972000	COLEGIO REGIONAL DE LA MONTAÑA	\$ 24,509.03	\$ 475.29	\$ 28,773.53	\$ 53,757.85	\$ 24,984.32	\$ 28,773.53	\$ -
	ADMINISTRACIÓN TERRENOS	\$ -0.00	\$ 17,735.30	\$ 20,005.44	\$ 37,740.74	\$ 17,735.30	\$ 20,005.44	\$ -
7091972000	ESTACION EXPERIMENTAL AGRÍCOLA LAJAS	\$ 6,106.58	\$ 6,172.10	\$ 6,229.76	\$ 18,508.44	\$ -	\$ 18,508.44	\$ 7,306.21

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
CORPORACIONES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACIÓN	CORPORACIONES PUBLICAS	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE + AJUSTES	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
6081972000	U.P.R. SISTEMA DE RETIRO	\$ -0.00	\$ 6,833.38	\$ 3,171.53	\$ 10,004.91	\$ -	\$ 10,004.91	\$ 1,749.80
1491972000	HOTEL DEVELOPMENT CORPORATION	\$ 792.04	\$ 2,665.97	\$ 4,226.28	\$ 7,684.29	\$ -	\$ 7,684.29	\$ -
3478142000	FIDEICOMISO PARQUES NACIONALES/ Recreación	\$ 6,594.03	\$ -	\$ -	\$ 6,594.03	\$ -	\$ 6,594.03	\$ 6,594.03
6971972000	COMPÀNIA DESARROLLO PENÌNSULA DE CANTERA	\$ 5.00	\$ 1,966.13	\$ 2,440.64	\$ 4,411.77	\$ -	\$ 4,411.77	\$ -
6091972000	ESTACIÒN EXPERIMENTAL AGRICOLA JUANA DÍAZ	\$ 925.50	\$ 1,445.00	\$ 1,979.59	\$ 4,350.09	\$ -	\$ 4,350.09	\$ 972.58
4091972000	ESTACIÒN EXPERIMENTAL AGRICOLA GURABO	\$ 8,976.75	\$ -5,916.14	\$ 1,205.91	\$ 4,266.52	\$ -	\$ 4,266.52	\$ 1,769.16
5081972000	U.P.R. JARDÍN BOTÁNICO	\$ 9,365.37	\$ -7,507.41	\$ 2,035.19	\$ 3,893.15	\$ -	\$ 3,893.15	\$ -
5091972000	ESTACIÒN EXPERIMENTAL AGRICOLA ISABELA	\$ 2,964.47	\$ 3,294.58	\$ 3,499.85	\$ 9,758.90	\$ 6,596.00	\$ 3,162.90	\$ -
3091972000	ESTACIÒN EXPERIMENTAL AGRICOLA COROZAL	\$ 6,675.06	\$ -3,743.12	\$ 1,586.04	\$ 4,517.98	\$ 1,384.98	\$ 3,133.00	\$ 601.10
2091972000	ESTACIÒN EXPERIMENTAL AGRICOLA ADJUNTAS	\$ 1,038.89	\$ -653.15	\$ 1,281.88	\$ 1,667.62	\$ -	\$ 1,667.62	\$ -
4591972000	CORPORACIÒN PROYECTO ENCLACE CAÑO MARTIN PEÑA	\$ -0.00	\$ 1,331.55	\$ 1,471.95	\$ 2,803.50	\$ 1,331.55	\$ 1,471.95	\$ -
3521393158	CORP PÙBLICA PARA SUSP Y SEGURO DE COOPERATIVAS DE P.R. / COSSEC	\$ 216.36	\$ 56.87	\$ 32.99	\$ 306.22	\$ -	\$ 306.22	\$ 233.86
5771972000	SALUD INTEGRAL DE LA MONTAÑA	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
BANCO	BANCO Y AGENCIA FINANCIAMIENTO VIVIENDA	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
8181972000	ULTRACOM (TELECOMUNICACIONES ULTRAMARINAS)	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
cruv	CRUV	\$ 0.00	\$ -	\$ -	\$ 0.00	\$ -	\$ 0.00	\$ -
6671972000	CORPORACIÒN ARTES ESCÉNICO MUSICALES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
0	CORP PÙBLICA PARA SUSP Y SEGURO DE COOPERATIVAS DE P.R. ---- Duplicada	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
AUT.PTA.BOR	AUT. ADM. Y DESARROLLO PTA BORINQUEN	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
9491972000	COLEGIO UNIVERSITARIO JUSTICIA CRIMINAL	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
6005053839	COMISION DEL PUERTO DE MAYAGUEZ	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
781972000	BANCO GUBERNAMENTAL DE FOMENTO	\$ -9.41	\$ -	\$ -	\$ -9.41	\$ -	\$ -9.41	\$ -
7081972000	OFICINA LIQUIDACIÓN CUENTAS CRUV	\$ -43.59	\$ -	\$ -	\$ -43.59	\$ -	\$ -43.59	\$ -
7191972000	AUTORIDAD FINANCIAMIENTO INFRAESTRUCTURA	\$ -0.00	\$ -1,733.06	\$ -	\$ -1,733.06	\$ -	\$ -1,733.06	\$ -
O681972000	AUTORIDAD PARA CONSERVACIÒN Y DESARROLLO CULEBRA	\$ -1,466.68	\$ -9,168.05	\$ 795.97	\$ -9,838.76	\$ -	\$ -9,838.76	\$ -
3971972000	CORP. CENTRO DE BELLAS ARTES	\$ -267,284.03	\$ 72,724.10	\$ 77,845.64	\$ -116,714.29	\$ -	\$ -116,714.29	\$ -

AUTORIDAD DE ENERGÍA ELÉCTRICA
 DEPARTAMENTO CUENTAS DE GOBIERNO
RESUMEN INFORME MENSUAL DE BALANCES ADEUDADOS
CORPORACIONES
AL 30 DE ABRIL DE 2021

NUMERO DE IDENTIFICACIÓN	CORPORACIONES PUBLICAS	BALANCE AÑOS ANTERIORES	BALANCE AÑO CORRIENTE	FACTURA CORRIENTE + AJUSTES	BALANCE ADEUDADO	PAGOS RECIBIDOS *al mes corriente	TOTAL BALANCE ADEUDADO	BALANCE 60 DÍAS O MÁS
GRAN TOTAL		\$ 191,779,493.21	\$ 32,135,399.48	\$ 22,605,184.00	\$ 246,520,076.69	\$ 29,732,471.87	\$ 216,787,604.82	\$ 176,265,234.90

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
INFORME MENSUAL MUNICIPIOS - BALANCE DE EXCLUSIONES
AL 30 DE ABRIL DE 2021

Municipio	Cuenta Exclusiones	Bal Inicial Años Anteriores	Balance Final Años Anteriores	Balance Inicial Año Corriente	Facturación Corriente	Pagos Factura Corriente	Total Pagos Recibidos en el Mes	Ajustes	Bal Año Fiscal	Total Adeudado
		Pagos Años Anteriores								
ADJUNTAS	0	\$0.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
AGUADA	4793940000	\$0.00	\$ 182,192.68	\$ 15,121.36	\$ 1,742.68	\$ -	\$ -	\$ -	\$ 16,864.04	\$ 199,056.72
AGUADILLA	0693940000	\$0.00	\$ 853,857.46	\$ -58,109.42	\$ 25,715.29	\$ -	\$ -	\$ -	\$ -32,394.13	\$ 821,463.33
AGUAS BUENAS	1921370000	\$0.00	\$ 8,091.91	\$ 4,949.54	\$ 1,171.38	\$ -	\$ -	\$ -	\$ 6,120.92	\$ 14,212.83
AIBONITO	2031136679	\$0.00	\$ 1,401.41	\$ 2,560.99	\$ 278.13	\$ -	\$ -	\$ -	\$ 2,839.12	\$ 4,240.53
AÑASCO	0068209186	\$0.00	\$ 284,034.99	\$ 106,000.80	\$ 11,795.28	\$ -	\$ -	\$ -	\$ 117,796.08	\$ 401,831.07
ARECIBO	8558300000	\$0.00	\$ 215,276.31	\$ 45,198.44	\$ 6,336.66	\$ -	\$ -	\$ -	\$ 51,535.10	\$ 266,811.41
ARROYO	5948149846	\$0.00	\$ 520,403.58	\$ 380,321.04	\$ 16,425.67	\$ -	\$ -	\$ -	\$ 396,746.71	\$ 917,150.29
BARCELONETA	2590954218	\$0.00	\$ -	\$ 20,318.51	\$ 11,807.37	\$ 20,318.51	\$ 20,318.51	\$ -	\$ 11,807.37	\$ 11,807.37
BARRANQUITAS	1716305527	\$0.00	\$ -	\$ 4,155.92	\$ 2,132.96	\$ 2,062.58	\$ 2,062.58	\$ -	\$ 4,226.30	\$ 4,226.30
BAYAMÓN	1491933759	\$0.00	\$ 2,882,212.98	\$ 1,330,652.52	\$ 70,815.72	\$ -	\$ -	\$ -	\$ 1,401,468.24	\$ 4,283,681.22
CABO ROJO	2087315398	\$0.00	\$ 5,667.05	\$ -4,597.16	\$ 388.03	\$ -	\$ -	\$ -	\$ -4,209.13	\$ 1,457.92
CAGUAS	4227897288	\$0.00	\$ 1,493,326.15	\$ 299,540.87	\$ 46,018.00	\$ -	\$ -	\$ -	\$ 345,558.87	\$ 1,838,885.02
CAMUY	1212940000	\$0.00	\$ 284,449.26	\$ 28,849.18	\$ 3,396.83	\$ -	\$ -	\$ -	\$ 32,246.01	\$ 316,695.27
CANÓVANAS	5508387787	\$0.00	\$ 90,861.32	\$ 3,780.46	\$ 1,268.75	\$ -	\$ -	\$ -	\$ 5,049.21	\$ 95,910.53
CAROLINA	0664900530	\$0.00	\$ 2,691,113.39	\$ 480,784.10	\$ 70,977.04	\$ -	\$ -	\$ -	\$ 551,761.14	\$ 3,242,874.53
CATAÑO	6477212000	\$0.00	\$ 488,955.19	\$ 112,819.05	\$ -20,400.59	\$ -	\$ -	\$ -	\$ 92,418.46	\$ 581,373.65
CAYEY	9707071000	\$0.00	\$ 13,888.29	\$ -1,456.17	\$ 5,240.23	\$ -	\$ -	\$ -	\$ 3,784.06	\$ 17,672.35
CEIBA	8539520000	\$0.00	\$ 299,495.07	\$ 14,553.66	\$ 1,782.41	\$ -	\$ -	\$ -	\$ 16,336.07	\$ 315,831.14
CIALES	7023330962	\$0.00	\$ 210,769.86	\$ 15,382.42	\$ 2,044.83	\$ -	\$ -	\$ -	\$ 17,427.25	\$ 228,197.11
CIDRA	9541674508	\$0.00	\$ 653,853.87	\$ 41,089.18	\$ 4,861.49	\$ -	\$ -	\$ -	\$ 45,950.67	\$ 699,804.54
COAMO	3922851000	\$0.00	\$ 130,616.90	\$ 42,837.78	\$ 5,662.85	\$ -	\$ -	\$ -	\$ 48,500.63	\$ 179,117.53
COMERÍO	1132851000	\$0.00	\$ -3,724.95	\$ 11,638.16	\$ 2,371.58	\$ 5,834.23	\$ 5,834.23	\$ -	\$ 8,175.51	\$ 4,450.56
COROZAL	0383050000	\$0.00	\$ 439,645.81	\$ 95,002.92	\$ 690.00	\$ 690.00	\$ 690.00	\$ -	\$ 95,002.92	\$ 534,648.73
CULEBRA	2305550315	\$0.00	\$ 10.00	\$ -20.00	\$ 7.23	\$ -	\$ -	\$ -	\$ -12.77	\$ -2.77
DORADO	7768602000	\$0.00	\$ -2,635.85	\$ 1,510.91	\$ 133.79	\$ -	\$ -	\$ -	\$ 1,644.70	\$ -991.15
FAJARDO	8845381000	\$0.00	\$ 18,903.86	\$ -12,967.61	\$ 3,644.48	\$ 5,936.25	\$ 5,936.25	\$ -	\$ -15,259.38	\$ 3,644.48
FLORIDA	0	\$0.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
GUÁNICA	5263104311	\$0.00	\$ 113,656.59	\$ 11,609.83	\$ 940.70	\$ -	\$ -	\$ -	\$ 12,550.53	\$ 126,207.12

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
INFORME MENSUAL MUNICIPIOS - BALANCE DE EXCLUSIONES
AL 30 DE ABRIL DE 2021

Municipio	Cuenta Exclusiones	Bal Inicial Años Anteriores	Balance Final Años Anteriores	Balance Inicial Año Corriente	Facturación Corriente	Pagos Factura Corriente	Total Pagos Recibidos en el Mes	Ajustes	Bal Año Fiscal	Total Adeudado
		Pagos Años Anteriores								
GUAYAMA	8884710704	\$0.00	\$ 8,066.59	\$ 16,499.32	\$ 3,968.48	\$ 3,777.91	\$ 3,777.91	\$ -12,721.41	\$ 3,968.48	\$ 12,035.07
GUAYANILLA	57044410000	\$0.00	\$ 892.95	\$ 678.71	\$ 184.20	\$ -	\$ -	\$ -	\$ 862.91	\$ 1,755.86
GUAYNABO	3125355169	\$0.00	\$ 6,978,636.43	\$ 1,004,802.34	\$ 139,362.81	\$ -	\$ -	\$ 298.07	\$ 1,144,463.22	\$ 8,123,099.65
GURABO	100799750	\$0.00	\$ 8,382.45	\$ -2,797.64	\$ 854.61	\$ -	\$ -	\$ -	\$ -1,943.03	\$ 6,439.42
HATILLO	3496100000	\$0.00	\$ 387,872.22	\$ -338,622.44	\$ 29,650.51	\$ -	\$ -	\$ -	\$ -308,971.93	\$ 78,900.29
HORMIGUEROS	2885980000	\$0.00	\$ -0.00	\$ 116.47	\$ 182.70	\$ 116.47	\$ 116.47	\$ -	\$ 182.70	\$ 182.70
HUMACAO	4773910000	\$0.00	\$ 1,573,416.07	\$ 448,303.42	\$ 69,194.47	\$ -	\$ -	\$ -	\$ 517,497.89	\$ 2,090,913.96
ISABELA	1617100000	\$0.00	\$ 253,641.68	\$ -2,104.39	\$ 1,753.05	\$ -	\$ -	\$ -	\$ -351.34	\$ 253,290.34
JAYUYA	1338163990	\$0.00	\$ 373,059.46	\$ 52,596.47	\$ 7,415.88	\$ -	\$ -	\$ -	\$ 60,012.35	\$ 433,071.81
JUANA DÍAZ	7331941000	\$0.00	\$ 25,757.53	\$ 13,230.64	\$ 2,169.24	\$ -	\$ -	\$ -	\$ 15,399.88	\$ 41,157.41
JUNCOS	0386762116	\$0.00	\$ 4,594.92	\$ 2,999.85	\$ 344.33	\$ -	\$ -	\$ -	\$ 3,344.18	\$ 7,939.10
LAJAS	7428521000	\$0.00	\$ 16,360.06	\$ 7,114.14	\$ 926.60	\$ -	\$ -	\$ -	\$ 8,040.74	\$ 24,400.80
LARES	3963290000	\$0.00	\$ 0.00	\$ 1,139.26	\$ 1,083.55	\$ 1,139.26	\$ 1,139.26	\$ -	\$ 1,083.55	\$ 1,083.55
LAS MARÍAS	9201890741	\$0.00	\$ 115,969.24	\$ 28,532.35	\$ 3,279.49	\$ -	\$ -	\$ -	\$ 31,811.84	\$ 147,781.08
LAS PIEDRAS	5425961000	\$0.00	\$ 120,483.44	\$ 165.52	\$ 10.00	\$ -	\$ -	\$ -	\$ 175.52	\$ 120,658.96
LOÍZA	461991598	\$0.00	\$ 166.27	\$ -86.27	\$ 10.00	\$ -	\$ -	\$ -	\$ -76.27	\$ 90.00
LUQUILLO	9222270000	\$0.00	\$ 162.72	\$ -89.68	\$ 91.01	\$ -	\$ -	\$ -	\$ 1.33	\$ 164.05
MANATÍ	2551940000	\$0.00	\$ -417.14	\$ 7,626.87	\$ 4,097.72	\$ 3,809.29	\$ 3,809.29	\$ -	\$ 7,915.30	\$ 7,498.16
MARICAO	7725744030	\$0.00	\$ 26,968.63	\$ 6,865.48	\$ 722.73	\$ -	\$ -	\$ -	\$ 7,588.21	\$ 34,556.84
MAUNABO	6654696783	\$0.00	\$ 124,898.77	\$ 40,954.53	\$ 3,821.36	\$ -	\$ -	\$ -	\$ 44,775.89	\$ 169,674.66
MAYAGÜEZ	9378016656	\$0.00	\$ 774,191.12	\$ 487,295.24	\$ 60,354.50	\$ -	\$ -	\$ -	\$ 547,649.74	\$ 1,321,840.86
MOCA	4560622733	\$0.00	\$ -10,011.73	\$ 56,582.73	\$ 12,238.35	\$ -	\$ -	\$ -	\$ 68,821.08	\$ 58,809.35
MOROVIS	9640981002	\$0.00	\$ 181,405.24	\$ 13,966.68	\$ 1,902.97	\$ -	\$ -	\$ -	\$ 15,869.65	\$ 197,274.89
NAGUABO	6504168670	\$0.00	\$ 108,107.68	\$ 1,512.20	\$ 20.00	\$ -	\$ -	\$ -	\$ 1,532.20	\$ 109,639.88
NARANJITO	7242854770	\$0.00	\$ 777,192.46	\$ 104,839.70	\$ 13,815.41	\$ -	\$ -	\$ -	\$ 118,655.11	\$ 895,847.57
OROCOVIS	5764970000	\$0.00	\$ -0.00	\$ 1,529.43	\$ 1,677.79	\$ -	\$ -	\$ -	\$ 3,207.22	\$ 3,207.22
PATILLAS	6468127415	\$0.00	\$ 39,788.47	\$ 11,962.42	\$ 1,372.00	\$ -	\$ -	\$ -	\$ 13,334.42	\$ 53,122.89
PEÑUELAS	6191975176	\$0.00	\$ 220,536.16	\$ 82,646.13	\$ 8,745.13	\$ -	\$ -	\$ -	\$ 91,391.26	\$ 311,927.42
PONCE	2278142000	\$0.00	\$ 2,383,909.36	\$ 1,276,546.72	\$ 212,401.43	\$ 1,405,871.33	\$ 1,405,871.33	\$ -	\$ 83,076.82	\$ 2,466,986.18

AUTORIDAD DE ENERGÍA ELÉCTRICA
DEPARTAMENTO CUENTAS DE GOBIERNO
INFORME MENSUAL MUNICIPIOS - BALANCE DE EXCLUSIONES
AL 30 DE ABRIL DE 2021

Municipio	Cuenta Exclusiones	Bal Inicial Años Anteriores	Balance Final Años Anteriores	Balance Inicial Año Corriente	Facturación Corriente	Pagos Factura Corriente	Total Pagos Recibidos en el Mes	Ajustes	Bal Año Fiscal	Total Adeudado
		Pagos Años Anteriores								
QUEBRADILLAS	2589590000	\$0.00	\$ 727,316.74	\$ 119,385.98	\$ 10,283.00	\$ 12,213.89	\$ 12,213.89	\$ -	\$ 117,455.09	\$ 844,771.83
RINCÓN	8793940000	\$0.00	\$ 82,162.74	\$ 17,523.54	\$ 2,739.55	\$ -	\$ -	\$ -	\$ 20,263.09	\$ 102,425.83
RÍO GRANDE	8418781000	\$0.00	\$ 166,868.00	\$ 21,140.28	\$ 2,134.40	\$ -	\$ -	\$ -	\$ 23,274.68	\$ 190,142.68
SABANA GRANDE	7968295718	\$0.00	\$ 5,959.71	\$ 934.87	\$ 121.17	\$ 6,154.49	\$ 6,154.49	\$ -	\$ -5,098.45	\$ 861.26
SALINAS	536731000	\$0.00	\$ -16,030.85	\$ 5,491.10	\$ 915.96	\$ -	\$ -	\$ -	\$ 6,407.06	\$ -9,623.79
SAN GERMÁN	7106974861	\$0.00	\$ 299,936.38	\$ 229,743.33	\$ 24,053.97	\$ -	\$ -	\$ -	\$ 253,797.30	\$ 553,733.68
SAN JUAN	2232291000	\$0.00	\$ 182,772.44	\$ 236,915.26	\$ 305,844.27	\$ -	\$ -	\$ -	\$ 542,759.53	\$ 725,531.97
SAN LORENZO	2991571000	\$0.00	\$ 48,919.26	\$ -44,042.64	\$ 5,942.93	\$ 4,876.62	\$ 4,876.62	\$ -	\$ -42,976.33	\$ 5,942.93
SAN SEBASTIÁN	7105500000	\$0.00	\$ 1,229.70	\$ 65.27	\$ 7.23	\$ -	\$ -	\$ -	\$ 72.50	\$ 1,302.20
SANTA ISABEL	1686580000	\$0.00	\$ 334,226.37	\$ 22,971.38	\$ 10,061.86	\$ -	\$ -	\$ -	\$ 33,033.24	\$ 367,259.61
TOA ALTA	7008460000	\$0.00	\$ -0.00	\$ 1,656.52	\$ 3,407.23	\$ 5,097.88	\$ 5,097.88	\$ -	\$ -34.13	\$ -34.13
TOA BAJA	9027212000	\$0.00	\$ 60,439.08	\$ 32,047.17	\$ 3,844.15	\$ -	\$ -	\$ -	\$ 35,891.32	\$ 96,330.40
TRUJILLO ALTO	9158258270	\$0.00	\$ 3,084.69	\$ -4,052.38	\$ 680.12	\$ 801.04	\$ -	\$ 120.92	\$ -4,052.38	\$ -967.69
UTUADO	0	\$0.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
VEGA ALTA	6560850146	\$0.00	\$ 28,461.04	\$ 25,967.81	\$ 2,517.54	\$ -	\$ -	\$ -	\$ 28,485.35	\$ 56,946.39
VEGA BAJA	56445300000	\$0.00	\$ 301,056.51	\$ 82,866.29	\$ 9,850.52	\$ -	\$ -	\$ -	\$ 92,716.81	\$ 393,773.32
VIEQUES	20623655920	\$0.00	\$ 2,284.11	\$ 2,384.28	\$ 294.47	\$ -	\$ -	\$ -	\$ 2,678.75	\$ 4,962.86
VILLALBA	16522800000	\$0.00	\$ 152,826.49	\$ 25,890.77	\$ 3,186.57	\$ -	\$ -	\$ -	\$ 29,077.34	\$ 181,903.83
YABUCOA	5068940000	\$0.00	\$ 24,734.73	\$ 29,069.86	\$ 1,618.87	\$ -	\$ -	\$ -	\$ 30,688.73	\$ 55,423.46
YAUCO	7356940000	\$0.00	\$ 614,590.02	\$ -992.12	\$ 1,164.48	\$ -	\$ -	\$ -	\$ 172.36	\$ 614,762.38
TOTALES		0.00	\$ 29,391,191.34	\$ 7,121,300.05	\$ 1,247,567.40	\$ 1,478,699.75	\$ 1,477,898.71	\$ -12,302.42	\$ 6,877,865.28	\$ 36,269,056.62

Municipios no tienen cargos por Exclusiones

**COMMONWEALTH OF PUERTO RICO
PUERTO RICO ENERGY COMMISSION**

IN RE: THE PUERTO RICO ELECTRIC
POWER AUTHORITY

INITIAL RATE REVIEW

No. CEPR-AP-2015-0001

**SUBJECT: TESTIMONY IN SUPPORT
OF PETITION**

Direct Testimony of

RALPH ZARUMBA

Director, Navigant Consulting, Inc.

EUGENE GRANOVSKY

Managing Consultant, Navigant Consulting, Inc.

On behalf of the
Puerto Rico Electric Power Authority

May 27, 2016

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1 I. **INTRODUCTION**

2 A. **Witness Identification**

3 Q. **Please state your name, title, employer, and business address.**

4 A. We are Ralph Zarumba and Eugene Granovsky. We are collectively sponsoring this
5 testimony.

6 Ralph Zarumba is a Director at Navigant Consulting, Inc. (“Navigant”), a global
7 business and advisory firm. His business address is 30 S. Wacker Drive, Suite 3100,
8 Chicago, Illinois 60606.

9 Eugene Granovsky is a Managing Consultant at Navigant. His business address is
10 30 S. Wacker Drive, Suite 3100, Chicago, Illinois 60606.
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11 Q. **On whose behalf are you testifying?**

12 A. We are testifying as a panel on behalf of the Puerto Rico Electric Power Authority
13 (“PREPA”), a publicly-owned (public power) electric utility and instrumentality of the
14 Government of the Commonwealth of Puerto Rico (the “Commonwealth”).

15 B. **Summary of Testimony**

16 Q. **What is the purpose of your testimony?**

17 A. We are testifying in support of PREPA’s Petition requesting that the Puerto Rico Energy
18 Commission (the “Commission”) approve and establish new rates for PREPA. More
19 specifically, our testimony presents and supports what is commonly referred to as the
20 “rate design” of the proposed “permanent” rates.

21 In brief, the proposed rate design: (1) updates tariffs to reflect the costs of the
22 utility, (2) gives PREPA the opportunity to recover its “revenue requirement” (its costs of

23 offering and providing service to its Customers), (3) moves toward a more equitable
24 allocation of the revenue requirement to Customers, (4) implements legislative initiatives,
25 (5) promotes a clean energy solution, and (6) improves the transparency of rates and bills.

26 **C. Professional Background & Education**

27 Q. **Would each of you please describe your educational background and professional
28 experience?**

29 A. Yes. My name is Ralph Zarumba. My resume, which reviews my education,
30 professional qualifications, and experience in detail, is attached is PREPA Exhibit
31 ("Ex.") 4.01. R
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32 My name is Eugene Granovsky. My resume, which reviews my education,
33 professional qualifications, and experience in detail, is attached as PREPA Ex. 4.02.

34 **D. Additional Attachments**

35 Q. **In addition to your resumes, are there any additional exhibits to your testimony?**

36 A. Yes. We are sponsoring the following additional exhibit: PREPA Ex. 4.03.

37 Q. **Did you prepare, or have prepared under your supervision, any of the Schedules
38 and other papers submitted to the Commission under its Regulation No. 8720 as
39 support for and attached to PREPA's Petition for new rates?**

40 A. Yes, we prepared or have had prepared under our supervision certain of the Schedules
41 and other papers: Schedules A-6 (also supported by other witnesses, see PREPA Ex. 5.0),
42 H-1, H-2, H-3, H-4, H-5, H-6, J-1, J-2, J-3, J-4, J-5, L-1, M-1, M-2, M-3, and N-1.

43 II. ISSUES IMPACTING PREPA'S TARIFFS IN GENERAL

A. Rate Design Objectives

45 Q. What are the overall objectives of PREPA's proposed rate design as reflected in its
46 proposed tariffs?

47 A. The overall objectives of PREPA's rate design are to:

1. Update tariffs to reflect the economic costs of the utility. The current tariff design is several decades old and does not reflect the economics of the utility. The new design in part uses the marginal cost of service study sponsored by Mr. Shlatz (PREPA Ex. 9.0) for guidance on setting specific tariff components closer to marginal cost.
 2. Recover PREPA's current revenue requirement. The current tariffs are not recovering the revenue requirement of the utility and need to be increased in order for PREPA to re-attain financial health. See PREPA Ex. 5.0.
 3. Equitable allocation of the revenue requirement. Currently a very wide difference exists between allocated (embedded) costs as reflected in the embedded cost of service study ("ECOSS") and the level of cost recovery of various tariff classes. See PREPA Ex. 8.0. Moving each tariff class to cost of service, however, would trigger very significant increases for some customer classes. The proposed revenue allocation reflects the ratemaking principle of gradualism and is a first step to an equitable allocation of the revenue requirement to each tariff class.
 4. Implement certain legislative initiatives. A number of legislative initiatives in Puerto Rico impact electricity tariffs. The proposed tariff design implements these initiatives in a practical and rationale manner.

66 5. Promote a clean energy solution. The Commonwealth has adopted a policy
67 promoting clean electric power generation. PREPA's tariffs have been designed
68 to promote and subsidize clean energy.

69 6. Implement Transparency. The existing tariffs bundle and combine a number of
70 charges which does not provide customers information on what costs are included
71 in their electric bills. An effort has been made to unbundle costs and in the case
72 of subsidies quantify the costs of these programs on customers' bills.

B. Redesign of the Fuel Cost Adjustment and the Purchased Power Cost Adjustment Clauses

75 Q. Please describe the existing Fuel Cost Adjustment (“FCA”) and Purchased Power
76 Cost Adjustment (“PPCA”) clauses of PREPA’s tariffs.

77 A. PREPA's current FCA and PPCA capture the total cost of fuel and purchased power,
78 respectively. Further, the FCA and PPCA are increased ("grossed-up") by 1 divided by
79 0.89 in order to fund Contributions in Lieu of Taxes ("CILT") and other subsidies which
80 PREPA is legislatively mandated to provide to customers. This results in a 12.36%¹
81 gross-up.

82 Q. Have you identified shortcomings in the existing FCA and PPCA mechanisms?

83 A. Yes. We have identified the following shortcomings in the existing FCA and PPCA
84 mechanisms:

$$^1 12.36 = (1/.89).$$

- 85 1. The full costs of fuel and purchased power are captured through the FCA and
86 PPCA, making these mechanisms the largest component of the bills of nearly all
87 customers. The importance of these mechanisms is overstated on a revenue basis.
88 2. The PPCA contains the entire costs of the purchased power agreements from
89 AES, EcoElectrica, and other suppliers to PREPA. A significant level of costs
90 captured in the PPCA mechanism are not volumetric but related to the fixed cost
91 of operating these generating units. However, the PPCA mechanism is
92 volumetric. Therefore, the price signals (an economic and ratemaking term
93 relating to incentives to consume at an efficient level) sent to customers are
94 distorted. PREPA Ex. 8.09 provides an estimate of the fixed versus volumetric
95 costs associated with the purchased power contracts for the test year, which in this
96 case is Fiscal Year 2014 (July 1, 2013, to June 30, 2014). As PREPA Ex. 8.09
97 demonstrates, 44 percent of the costs of these agreements are not volumetric.
- 98 3. A gross-up factor of 12.36 percent is inappropriate for funding legislatively
99 mandated CILT and other subsidies. During time periods of high fuel costs, the
100 12.36 percent factor has the potential to over-collect compared to the level of
101 CILT and other subsidies, whereas during low fuel cost periods it will under-
102 collect compared to the level of CILT and other subsidies. PREPA Ex. 4.03
103 presents a comparison of the revenues which were estimated to be received from
104 the gross-up of the FCA and the PPCA and the actual costs of CILT and other
105 subsidies for FY 2017.

106 Q. **What is the proposal for the redesign of the FCA and the PPCA?**

107 A. The proposed FCA and PPCA clauses will contain a reconciling mechanism that moves
108 the average cost of fuel and purchased power for the test year into base rates. The FCA
109 and PPCA clauses will capture the deviation from the average cost of fuel and purchased
110 power for the test year period. The averages for the year period will be included in base
111 rates. The increment above or below the amounts captured in base rates will be the FCA
112 and PPCA factors.

113 Q. **Why is the proposed approach superior to the existing design of the FCA and the
114 PPCA?**

115 A. The proposed approach provides an advantage for PREPA and its customers for the
116 following reasons:

- 117 1. Greater flexibility is provided to develop the pricing design, which allows for
118 linking what is a significant percentage of the tariff to a volumetric pricing design.
119 Currently, the price signal sent to customers assumes that the cost of fuel and
120 purchased power is volumetric whereas in reality a significant amount of these
121 costs are unrelated to kilowatt hour ("kWh") consumption.
- 122 2. The fixed costs associated with purchased power agreements will no longer be
123 assessed to customers on a volumetric basis. The cost allocation will occur based
124 upon a methodology in the embedded cost of service study, which is proposed by
125 PREPA and will be reviewed by the Commission. See our second and separate
126 panel direct testimony, PREPA Ex. 8.0. As a result, the resulting tariff design
127 will not be biased toward a volumetric approach that distorts costs.

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128 3. The recovery of CILT and other subsidies have been removed from the FCA and
129 PPCA and placed in a separate reconciling clause. CILT and other subsidies are
130 not a fuel or purchased power expense. Removing the CILT and subsidies
131 provides two benefits: (1) the cost recovery is improved and (2) the level of
132 transparency is increased for customers' bills.

133 Q. **What is the level of fuel cost that is captured in base rates in your proposal?**

134 A. The level of fuel cost in base rates was determined by dividing the forecasted cost of fuel
135 in the FY 2017 by forecasted FY 2017 sales stated in kWh. Specifically, the amount of
136 fuel costs forecasted for FY2017 is \$655,968,367 and total forecasted FY 2017 kWh
137 sales is 17,268,325,180 kWh resulting in \$0.03799 per kWh of fuel cost in base rates.

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138 Q. **What is the level of purchased power cost that is captured in base rates in your
139 proposal?**

140 A. The level of purchased power cost captured in base rates is \$0.04748 per kWh. The level
141 of purchased power cost in base rates was determined by dividing the projected cost of
142 purchased power of \$819,906,882 by projected FY 2017 sales of 17,268,325,180 kWh.

143 Q. **How often will the cost of fuel of \$0.03799 per kWh in base rates change?**

144 A. The cost of fuel in base rates is proposed to remain constant until such time as new base
145 rates are proposed. If the proposed Formula Ratemaking Mechanism included in this
146 filing (see PREPA Ex. 7.0) is adopted, then the next adjustment to base rates and the
147 level of fuel in base rates will change in three years.

148 Q. **How often will the cost of purchased power of \$0.04748 per kWh in base rates change?**

150 A. Similarly to fuel, the cost of purchased power in base rates is proposed to remain constant
151 until new base rates are proposed.

152 Q. **Will the FCA and PPCA be reconciled?**

153 A. Yes. The costs, sales, and revenues under the FCA and PPCA will be reconciled
154 separately and regularly in order to achieve accuracy and avoid over and under-recovery.

155 Q. **How often will the FCA and PPCA be reconciled?**

156 A. The reconciliation will occur during quarterly updates.

157 Q. **Please describe how the reconciliation mechanism will operate.**

158 A. The actual costs, sales and revenues from the PPCA and FCA mechanisms for two
159 months of a quarter will be known when the quarterly mechanism is filed. However, the
160 third month will not be known. Therefore, PREPA proposes that the reconciliation will
161 capture the first and second months of the current quarterly cycle and the third (*i.e.* final)
162 month of the previous quarterly period. The proposed timing avoids the complication of
163 re-estimating the costs, sales and revenues associated with the mechanism.

164 Q. **How will PREPA prepare estimates of the cost of fuel and purchased power used in
165 proposed quarterly factors?**

166 A. The cost of fuel will be prepared using production cost models consistent with current
167 practice. The production cost model currently used by the company is PROMOD, which
168 is widely used in the electric power industry. The projections of the cost of purchased

169 power will be produced using budget models prepared by PREPA for non-fuel elements
170 of the cost calculation. PROMOD projections will be used for the fuel consumption
171 elements.

172 Q. **What if the forecasts used to prepare the FCA and PPCA are inaccurate (i.e., either**
173 **over- or under-recovering of costs)? Does the proposal include a mechanism to**
174 **provide a “mid-course correction” in the case of significant variances?**

175 A. Yes. We recommend that a 10 percent bandwidth be incorporated into the calculations so
176 that, if a variation meets or exceeds the bandwidth, then that would trigger a
177 recalculation. The mechanism would work as follows:

- 178 1. Each month when actual data becomes available, the FCA / PPCA factor will be
179 recalculated using the original forecast data and newly available actual data.
- 180 2. If the recalculated factor will differ from the targeted cost recovery level by 10
181 percent, in either direction, then the FCA / PPCA factors will be recalculated to
182 target the actual expenses incurred. The calculations will be filed with the Energy
183 Commission for expedited approval before they are implemented.

184 Q. **Will the calculations and detailed work papers which support the FCA and PPCA**
185 **calculations be available to the Commission?**

186 A. Yes. We propose that during the course of this proceeding, a technical conference be
187 convened to discuss the data requirements and format of the filing.

188 Q. **Given your proposal, what is the forecasted FCA and PPCA for the test year?**

189 A. If customers consume electric power following a pattern that is consistent with average
190 consumption for the PREPA system as a whole, the starting cost of the FCA and PPCA
191 will be zero. This cost is explained by the fact that the average of fuel in that customer's
192 base rate will be equal to the system average. In the case that fuel cost is more than
193 projected, the FCA will be a positive charge, and in the case that fuel cost is less than
194 projected, the FCA will be a credit. The same is true for the PPCA.

195 Q. **Are you including a cash working capital component of the FCA and PPCA
196 mechanisms?**

197 A. Yes. The amount of fuel and purchased power costs proposed to be included in base
198 rates reflects a relatively low price of fuel, and it is possible in the future that the price of
199 fuel could spike (have a sharp and significant rise in a short period). There is a time
200 value of money associated with a utility's incurring a cost before it recovers the cost,
201 such as would be associated with PREPA's carrying the costs of a fuel price spike for
202 some time before they are reflected in the FCA and PPCA and recovered. A severe spike
203 could even create a liquidity (cash flow) issue for PREPA. No cash working capital for
204 the fuel and purchased power expenses was included, however, in PREPA's proposed
205 revenue requirements. See PREPA Ex. 5.0. Therefore, a separate calculation of working
206 capital will be included in the FCA and PPCA cost adjustments.

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207 C. **CILT and Other Subsidies**

208 Q. **You previously referred to Contribution in Lieu of Taxes or CILT. What is CILT?**

209 A. As a publically owned entity, PREPA does not pay property taxes. However, PREPA is
210 required to compensate municipalities using a mechanism entitled Contribution in Lieu of
211 Taxes (CILT).

212 Q. **Is CILT a common expense for publically owned utilities?**

213 A. Yes. Most public power utilities are required to pay CILT or other similar assessments.

214 Q. **What is the amount CILT and these other subsidies?**

215 A. The amount of CILT is \$51,783,821 and other subsidies not including CILT are
216 \$168,312,921 in the proposed revenue requirement. In total, the sum of CILT and
217 subsidies is 6.4 percent of the revenue requirement.

218 Q. **Are these subsidies discretionary?**

219 A. No. PREPA is required to provide these subsidies. It is our understanding that these
220 subsidies are legislatively mandated.

221 Q. **How are these costs currently recovered?**

222 A. As is described above, CILT and the other subsidies currently are recovered as a “gross-
223 up” of the fuel and purchased power cost adjustment mechanisms. However, the existing
224 approach is an inexact approach to recovering these costs and PREPA has often under-
225 recovered these costs.

226 Q. **What is the design of the proposed mechanism?**

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227 A. The proposed recovery mechanism will be reconciling clauses for the CILT and other
228 subsidies. No risk will exist for PREPA to under- or over-recover the costs incurred, and
229 thus these risks also are eliminated for its customers.

230 Q. **How will the reconciliation mechanism operate?**

231 The mechanism will operate in a similar manner to the fuel and purchased power cost
232 adjustment described above, except that they will not start at zero because the test year
233 amount is not included in base rates. However, the reconciliation will only occur
234 annually.

235 Q. **Have you prepared an estimate of the values for these mechanisms for the first year
236 of operation?**

237 A. Yes. PREPA Schedule E-8 provides the initial CILT and Other Subsidies charge
238 calculations which are proposed for the first year of the proposed electric tariffs.

239 Q. **Will the CILT and subsidies charges be bypassable by customers operating
240 Distributed Energy Resources?**

241 A. No. These charges are intended to supported the operations of municipal customers and
242 programs which have been determined to serve the good of the Commonwealth of Puerto
243 Rico such as low income assistance for energy bills. Allowing any group of customers to
244 bypass these costs would be inequitable.

245 D. **Proposed Transition Charges**

246 Q. **Please describe the proposal to securitize PREPA's debt.**

247 A. Act 4-2016 provided PREPA with the opportunity to restructure PREPA's debt. The
248 Commission is currently reviewing certain aspects of the proposal in Docket
249 No. CEPR-AP-2016-0001. Various steps need to be accomplished to achieve the
250 restructuring, many of which are outside the scope of this rate case.

251 Q. **What impact would the restructuring have on PREPA if it is approved by the
252 Commission and the restructuring is effectuated?**

253 A. The restructuring would reduce PREPA's overall revenue requirement in both the short-
254 and long-term. The overall impact on the revenue requirement is quantified in PREPA
255 Ex. 5.0.

256 Q. **What mechanism will be used to collect revenues from customers to service the
257 debt?**

258 A. Act 4-2016 specified that residential customers will be assessed a monthly Transition
259 Charge on a per service agreement basis. Non-residential customers will be assessed a
260 Transition Charge on a kWh basis. PREPA Ex. 6.00 in Docket
261 No. CEPR-AP-2016-0001 details the calculation of these charges and provides estimates
262 of the Transition Charges.

263 Q. **How was the debt service used in the pricing design?**

264 A. The approach that follows describes how the cost of service analysis addressed the issue
265 of the Transition Charges without distorting the pricing design.

266 The embedded cost of service study (ECOSS) included the debt service through
267 the Transition Charges (including a gross-up for revenue lags and uncollectables) and the

268 legacy debt service not captured in the Transition Charges in the revenue requirement of
269 the utility. The study allocated costs to each tariff class and ignored the existence of the
270 Transition Charges. The resulting revenue requirement for each tariff class was
271 determined and shown in PREPA Schedule G-1.

- 272 1. The expected Transition Charge revenues were deducted on a tariff class basis
273 from the results of the ECOSS.
- 274 2. The resulting revenue requirement is the targeted level of revenues which are
275 expected to be recovered from bases rates and various cost adjustment
276 mechanisms.

277 The figure below demonstrates the above process.

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280 Q. Does the existence of the Transition Charges change the cost allocation in the
281 ECOSS?

282 A. It would not materially change. A slight difference exists for the treatment of bad debt in
283 the Transition Charges.

284 III. **ELECTRIC RATING PERIOD STUDY**

285 Q. Does PREPA currently differentiate its tariffs by season and Time of Use ("TOU")?

286 A. PREPA has a limited offering of TOU tariffs (TOU-T and TOU-P) and does not
287 differentiate tariffs by season.

288 Q. **Do you recommend that PREPA's tariffs should be differentiated by season and
289 TOU?**

290 A. No, but we should explain why in some detail. In order to answer that question, Navigant
291 prepared an Electric Rating Period Study.

292 Q. **What is an Electric Rating Period Study?**

293 A. An Electric Rating Period study identifies time periods when PREPA's costs are either
294 unusually high or low. An Electric Rating Period study focuses upon the following:

- 295 1. Does the utility cost structure exhibit significant levels of seasonality? In other
296 words, are costs higher or lower during certain months of the year?
297 2. Are daily cost patterns apparent in the utility cost structure? Specifically, are
298 certain hours associated with high costs than other hours?
299 3. Should weekend time periods have costs which differ from weekdays?

300 Q. **What variables did you analyze in the electric rating period study?**

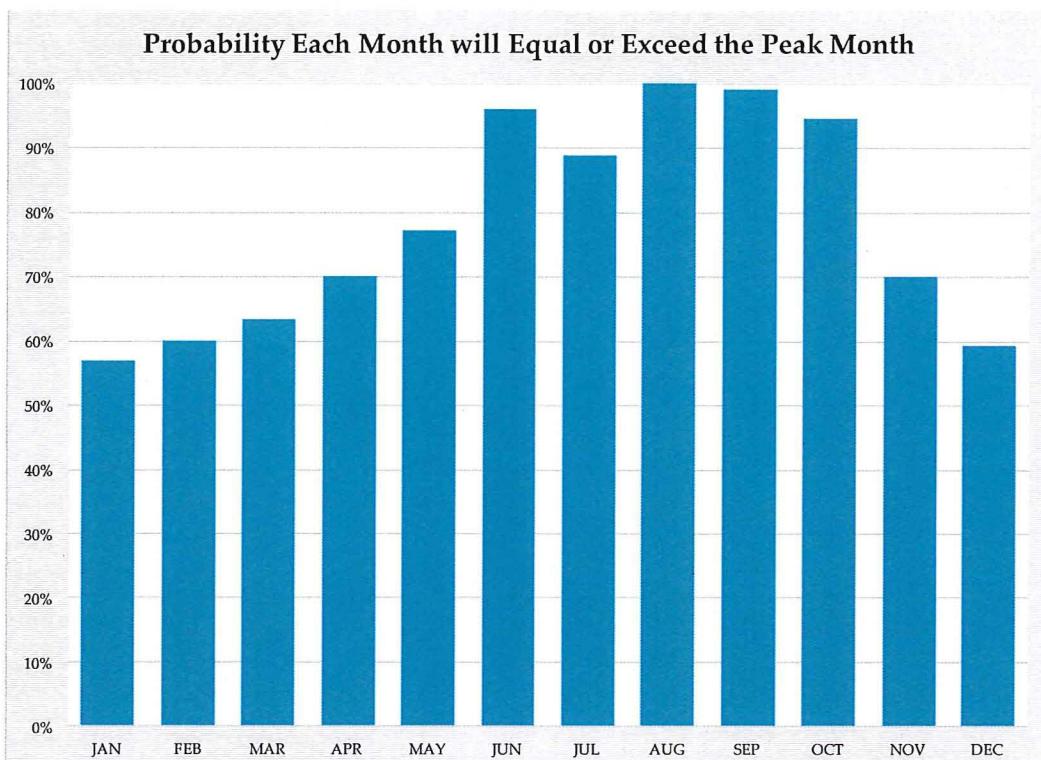
301 A. We analyzed historical hourly loads and projected Marginal Energy Costs ("MEC").

302 A. **Analysis of Seasonality**

303 Q. **Please describe the analysis of seasonality.**

304 A. Navigant's analysis of historical seasonal loads was performed on hourly load data for
305 the time period 2008 through 2014. We determined the normal probability that a given
306 month would be the peak load for the year. The results of the statistical analysis indicate
307 that the months of June through October, excluding July, demonstrate a normal

308 probability exceeding 90% that a peak will occur. The figure below illustrates the results
309 of this analysis.



310

311 Q. **Do you feel that the evidence in the study would support the creation of a high cost
312 season for electric tariffs?**

313 A. Some evidence exists, but it is not a strong argument for the creation of a high cost
314 season. The high costing period season would capture five of twelve months.

315 Q. **Does evidence exist which would support a higher energy price for the June through
316 October time periods?**

317 A. The differences between the MEC for June through October versus November through
318 March are shown in the table below:

	June through October	November through May
Average Marginal Energy	\$71.19	\$66.05
Cost		

319

320 **B. Time-Of-Use Analysis**

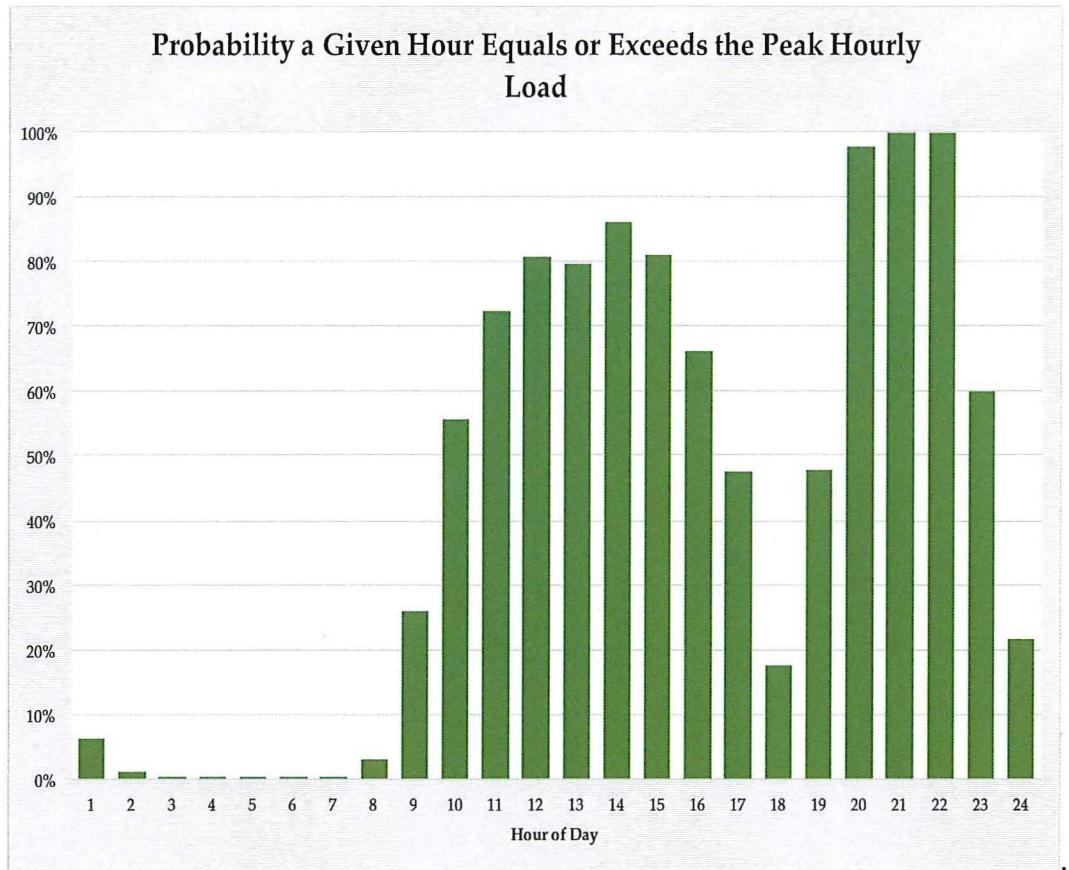
321 Q. **Have you performed a Time-Of-Use analysis of loads and MEC?**

322 A. Yes. The analysis adopted the same hypothesis analysis approach previously described
323 in the seasonality analysis.

324 Q. **Please describe the results of your analysis?**

325 A. PREPA's daily loads have two peaks. The first occurs in midafternoon (H14) and the
326 second in the evening (H21) with the evening load being the higher of the two.
327 Therefore, an on-peak time period can be either broadly defined as H10 through H23 or
328 narrowly defined as H20 through H22.

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- 330 Q. **Have you analyzed MEC for on-peak versus off-peak time periods as defined above?**
- 331 A. The table below shows the average MEC for the broad and narrow time periods as
- 332 defined above.

	On-Peak	Off-Peak
Average MEC – Narrow	\$85.95	\$65.18
On-Peak of H20-H22		
Average MEC – Broad	\$72.92	\$60.59
On-Peak of H10-H23		

333

334 Q. **What are your recommendations regarding the definition of an on-peak time
335 period?**

336 A. We are reticent to recommend the broad definition of an on-peak time period due to the
337 rapid increase of rooftop photovoltaic (“PV”) generation. If the current PV growth trend
338 continues, it is possible the peak in loads which occur earlier in the day (i.e., H10 through
339 H17) could be significantly depressed.

340 There is an argument for a narrower definition of on-peak periods.

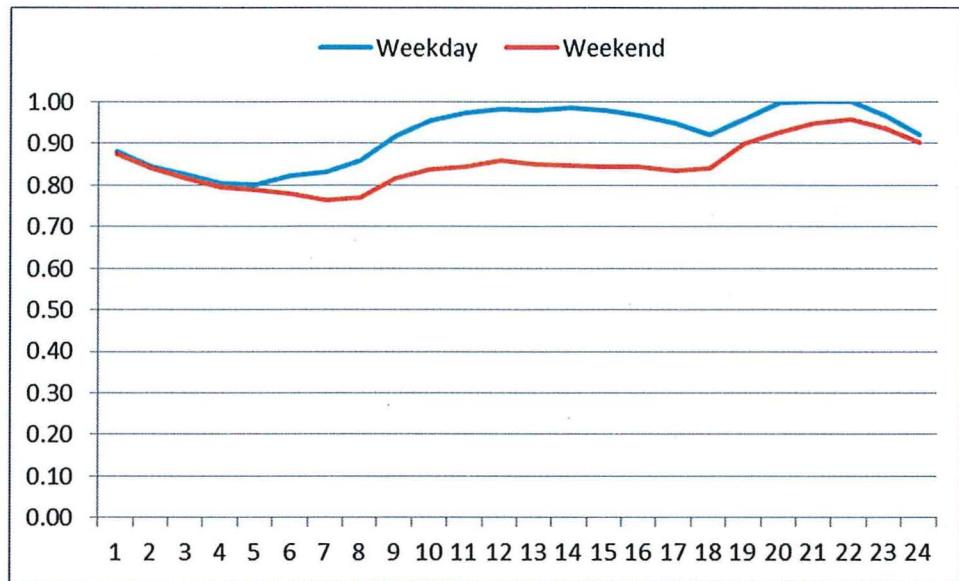
341 C. **Analysis of Weekends Versus Weekdays**

342 Q. **Have you performed an analysis to support or reject a price differential for
343 weekdays versus weekends?**

344 A. Yes. We used approaches similar to those used for the seasonality analysis discussed
345 above using hourly loads.

346 Q. **Please summarize your findings.**

347 A. The figure below illustrates the compares the unitized load profiles for weekdays versus
348 weekends.



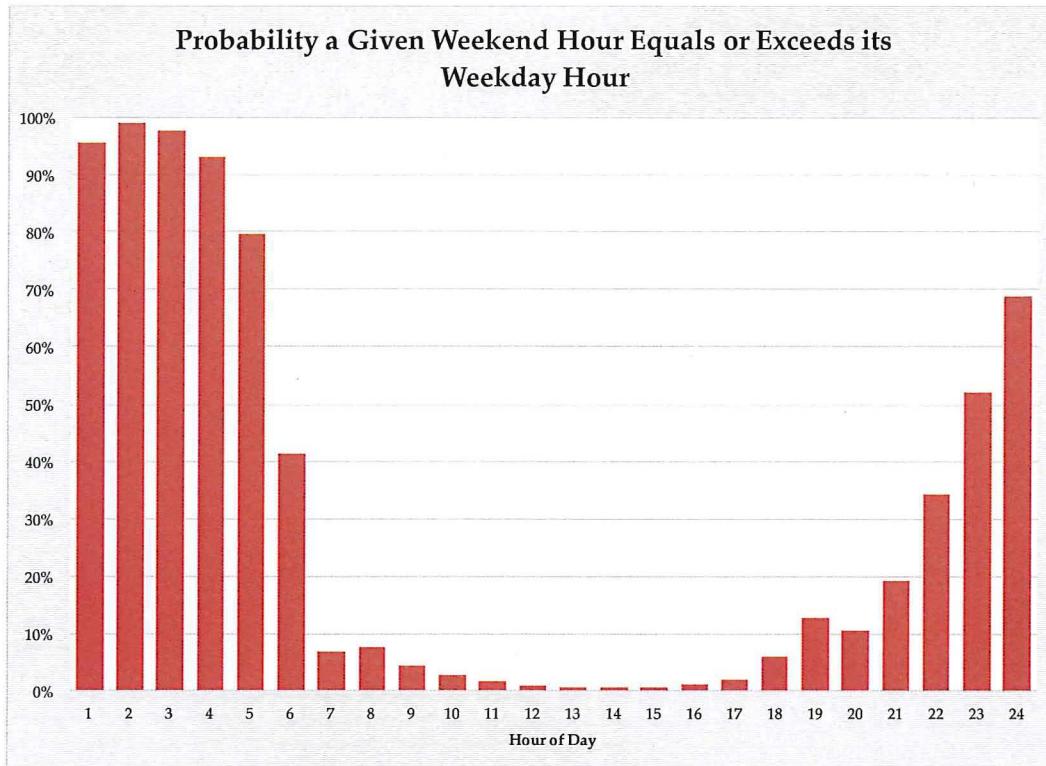
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350 Inasmuch as the general load shapes of weekdays versus weekends are similar
351 during most weekend hours (with the exception of overnight hours of H24 through H5)
352 are below that of weekdays.

353 We performed a second test of the weekend time periods which calculated the
354 normal probability that hours during a narrowly defined on-peak time period would equal
355 the daily peak. The results of the normal probability analysis are shown in the figure
356 below and indicate the difference in the weekday versus weekend loads are not different
357 on a statistical basis.

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359 Q. **Do you recommend that weekends be considered on-peak or off-peak?**

360 A. Again, the evidence is not compelling. Inasmuch as during a significant part of the days
361 the hourly weekend loads are below that of a weekday the difference in the weekend and
362 weekday peak hour is not statistically significant which would therefore imply that no
363 difference in the peaks exist.

364 D. **Conclusions**

365 Q. **What are your final recommendations regarding the Rating Period Analysis?**

366 A. We are recommending no changes at this time for the following reasons:

367 1. The evidence supporting specific definitions for a seasonal and TOU period is not
368 compelling. Inasmuch as some evidence exists it is not extremely strong.

- 369 2. Puerto Rico is experiencing significant growth in the installation of photovoltaic
370 distributed energy resources (“DER”). If this trend continues, the seasonal and
371 diurnal load shapes could significantly change, which would in turn potentially
372 change the shapes of the MEC. As a result, any definitions implemented as a
373 result of this proceeding would potentially need to be changed in the next several
374 years, triggering costs for both PREPA and its customers.
- 375 3. PREPA is proposing a number of significant changes in its pricing design as is
376 detailed below. Because the evidence for implementing seasonal and TOU
377 pricing differentials is not compelling, we recommend that the universal
378 introduction of seasonality and TOU pricing differential be deferred until the rate
379 proceeding.
- 380 4. We recommend that the existing TOU tariffs, TOU-P and TOU-T, be retained
381 until the next full rate proceeding.

382 We therefore suggest that a new Rating Period Study be performed in PREPA’s
383 next rate request.

384 **IV. MITIGATION OF THE RATE INCREASES**

385 Q. **Does Navigant propose to adopt the revenue allocations produced in the ECOSS
386 when preparing the proposed tariffs?**

387 A. No. We propose to mitigate the revenue allocations for the following reasons:

- 388 1. As previously discussed, many of the data inputs used in the ECOSS were
389 estimated due to data being dated or unavailable. Inasmuch as it is Navigant’s
390 opinion that the studies provided in this proceedings are fair and the best quality

391 given PREPA's circumstances, we recognize that better information may be
392 available in the future which could possibly change the results of this study.

393 2. Ratemaking principles recognize that gradualism generally is required when
394 significantly moving tariff classes closer to cost of service. It has been over a
395 quarter century since a complete PREPA base rate change has occurred and many
396 of the proposed changes to certain tariffs, especially residential customers, are too
397 large to be accomplished in a single proceeding.

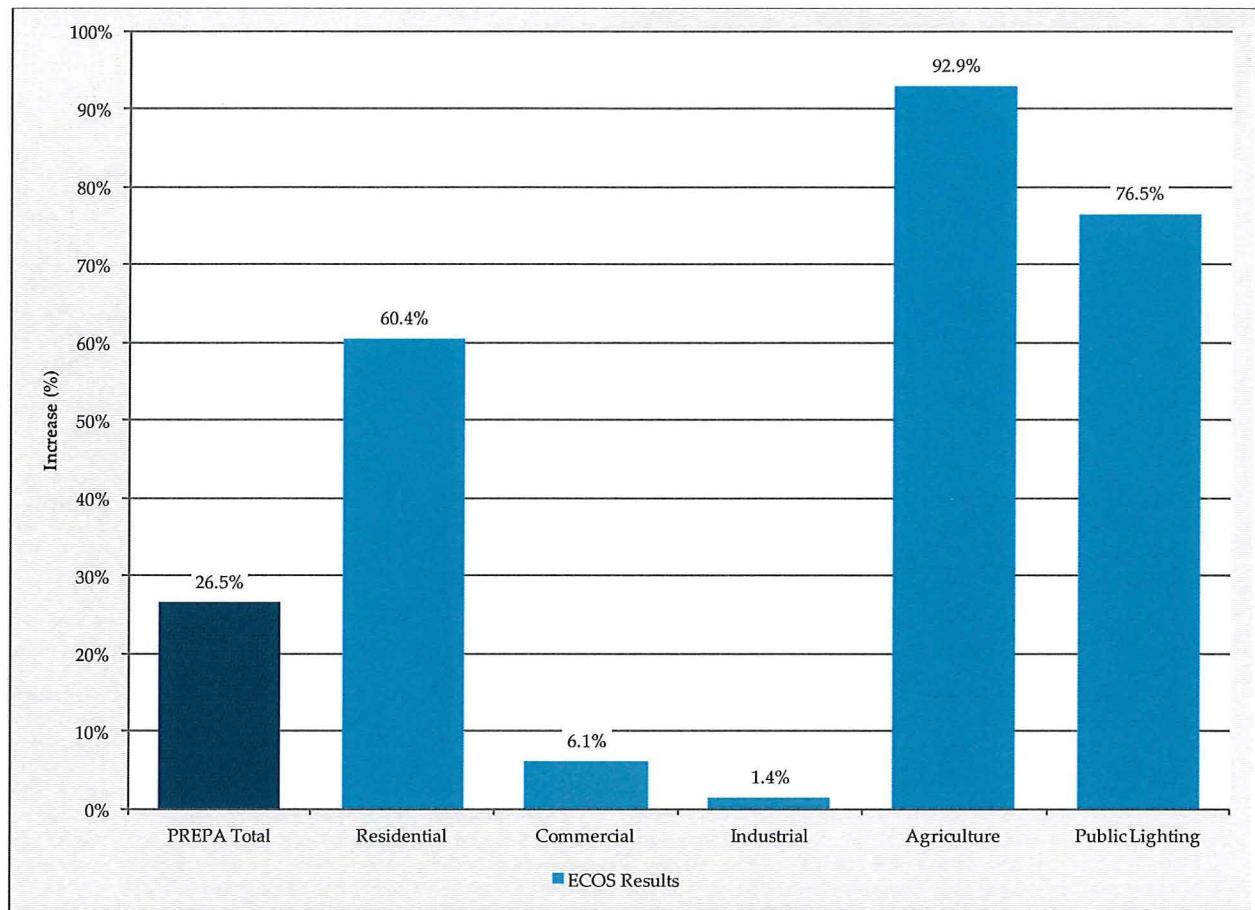
398 We therefore propose that the revenue allocations produced by the ECOSS be
399 significantly mitigated.

400 Q. **What approach have you developed to allocate the revenue requirement to each
401 tariff class?**

402 A. We have developed the following process to allocate the revenue requirement:

403 1. Adopt the Results of the Embedded Cost of Service Study. The process began by
404 adopting the ECOSS target revenues by customer class as previously discussed.
405 The results are demonstrated below in the figure below.

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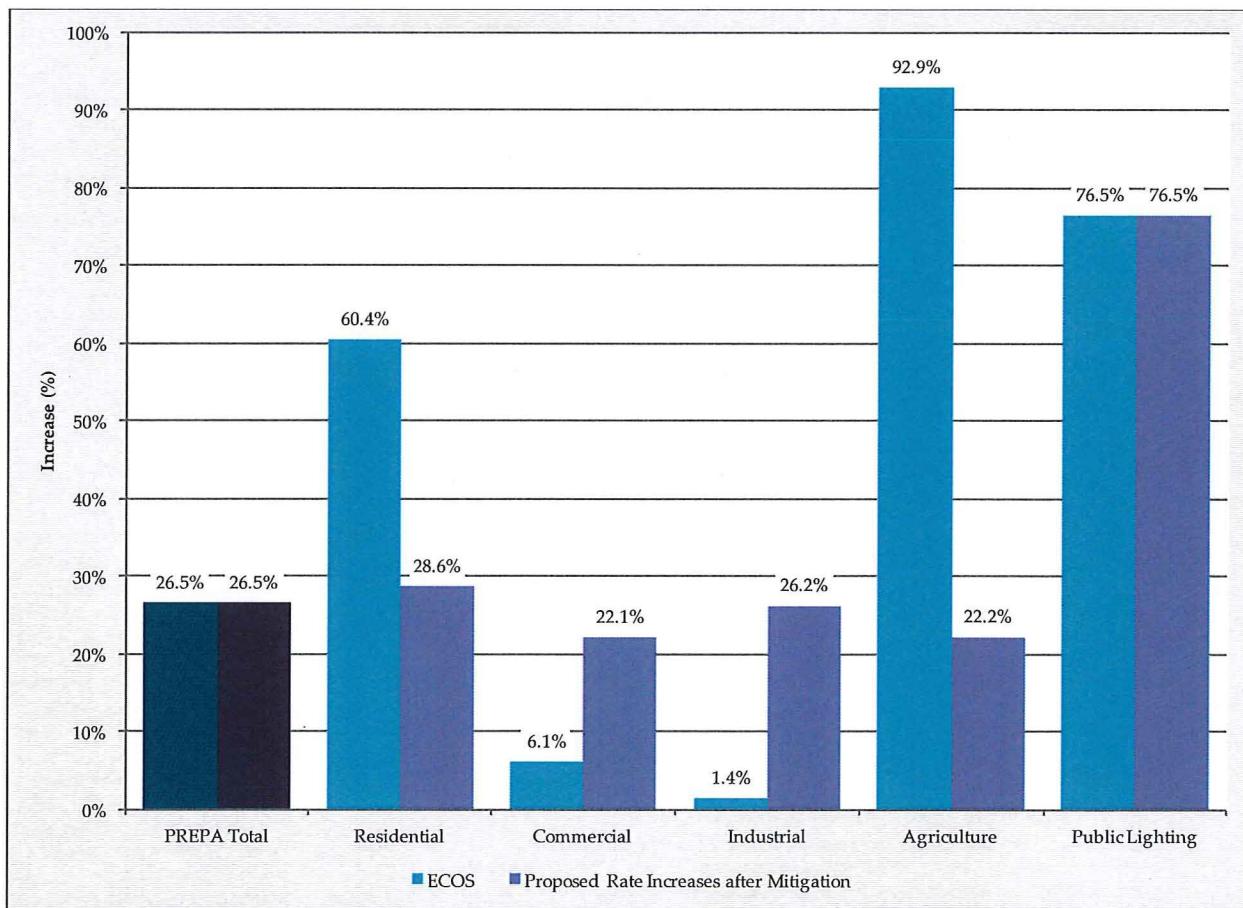
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- 407 2. Remove the Securitization Revenue Requirement from the Total Revenue
408 Requirement. The Transition Charges involve a reconciling clause with its own
409 true-up mechanism, so any over- or under-collection should have no impact on
410 PREPA's own revenues.
- 411 3. Public Lighting tariffs were moved to Full Cost of Service. Public Lighting is a
412 subsidized class, and therefore required a redistribution of the overall revenue
413 requirement. Therefore, adverse customer impacts are artificially high.
- 414 4. Eliminate any Decreases Justified by the Embedded Cost of Service. If any
415 classes required a decrease in overall rates those decreases were eliminated. The

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416 resulting dollars were allocated by kWh to the other classes (namely, Residential
417 and Agricultural).

418 5. Establish Mitigation Limits for Rate Increases. Finally, the total Residential class
419 increase was limited to within 5 percent of the total increases of the other
420 customer classes.



421

422 Q. What threshold was chosen to determine the maximum rate increase by customer
423 class? PL
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424 A. It was determined that residential customers should not experience an increase that was
425 more than 5 percent in excess of that provided to the non-lighting customer classes. The

426 5 percent threshold was chosen based upon judgment and reflects the opinions of
427 PREPA's management, the experience of the Navigant team, and socio-economic factors
428 on the island.

429 Q. **What are the resulting revenue adjustments proposed in your pricing design?**

430 A. PREPA Schedule H-1a provides the proposed adjustments in the level of revenues by
431 customer class. PREPA Schedule H-1b provides the proposed adjustments in the level of
432 revenues by tariff.

433 V. **TARIFF UNBUNDLING**

434 Q. **Please describe tariff unbundling.**

435 A. Tariff unbundling is the process of splitting a tariff into various cost elements. At a high
436 level, cost elements generally follow the functions of an electric utility (i.e., generation,
437 transmission, and distribution) but are often extended to subcomponents of each function.

438 Q. **Why are tariffs unbundled?**

439 A. Different customers purchase different services from the utility. Tariffs are unbundled in
440 order to match the services which a customer receives with the revenues they pay to the
441 utility.

442 Q. **Has PREPA traditionally unbundled its tariffs?**

443 A. Some limited unbundling has already occurred. Customers served under primary and
444 transmission tariffs (e.g., GSP, GST, LIS) are served under tariff designs which unbundle
445 the demand and energy charges.

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446 Q. **What is the advantage of unbundled tariffs?**

447 A. Unbundled tariffs have the following advantages:

- 448 1. The price signals sent to customers are improved. The customer can make
449 informed decisions about consuming one more or less of a component of electric
450 service.
- 451 2. Cross-subsidization problems are reduced. A bundled tariff provides greater
452 ability for cross-subsidization compared to an unbundled tariff. The rationale for
453 the reduction in cross-subsidization is customers are purchasing a quantity of a
454 specific good (e.g., energy) without purchasing the other component of electric
455 service (e.g., capacity).

456 Q. **Has tariff unbundling become more important in the past several years?**

457 A. Yes. Several decades ago when PREPA's tariffs were last redesigned, the utility was
458 essentially the sole provider of electric service to customers. However, with the passage
459 of time, customers have been provided other options for receiving all or a portion of their
460 electric service. Therefore, unbundling of tariffs is necessary in order to properly price
461 the subcomponents of electric service used by each customer and avoid cross-
462 subsidization.

463 Q. **Can you provide examples of tariff unbundling which has been adopted in the
464 electric power industry?**

465 A. Yes. The following are examples of tariff unbundling for electric service in the United
466 States.

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- 467 1. In 1996, the Federal Energy Regulatory Commission (“FERC”) issued the
468 groundbreaking “Order 888” which mandated that all jurisdictional electric
469 utilities offer wholesale transmission access to all market participants. Previously
470 most wholesale transactions bundled generation and transmission service. Order
471 888 required that jurisdictional utilities unbundle generation and transmission
472 service and file with the FERC Open-Access Transmission Tariffs (“OATT”)
473 which allowed wholesale customers to unbundle transmission service from
474 generation service thus facilitating the development of competitive wholesale
475 markets. Further, the FERC recognized that customers purchasing only
476 transmission services may be required to use certain “ancillary services” may be
477 provided by the generation function which is an example of further bundling.
478 2. On the U.S. mainland, seventeen (17) jurisdictions have adopted retail electric
479 open-access which enables end-users to procure generation services from third
480 party providers. In order to facilitate these transactions, each jurisdiction was
481 required to unbundle tariffs in order to separate the generation component(s) from
482 the other tariff components.

483 Q. **How did you unbundle the PREPA tariffs?**

484 A. A separate ECOSS was performed excluding the expected Transition Charges revenues
485 (including lag). Specifically, the total revenue requirement is \$3,462,194,772 including
486 the Transition Charges of \$503,264,236. The new ECOSS is based upon a total revenue
487 requirement of \$2,958,930,536.

488 Q. **How was mitigation addressed when setting unbundled charges?**

489 A. An exercise in 100% cost-based unbundling would have ignored the mitigation which
490 was previously discussed. For example, a cost-based unbundling of Tariff GRS
491 (discussed later in our testimony) would result in \$0.11527/kWh for Production,
492 \$0.00993/kWh for Transmission, and \$0.07545/kWh for Distribution, totaling
493 \$0.20065/kWh. This exceeds the mitigated average price of \$0.17409/kWh. The
494 following process was followed to accomplish the unbundling:

- 495 1. CILT and Subsidies were subtracted from the average prices of \$0.17409/kWh.
- 496 2. The ratio of the unmitigated G/T/D functional prices were used to determine how
497 to split the remainder of the revenue requirement per kWh less CILT and subsidy
498 charges (\$0.16086/kWh).
- 499 3. The resulting unbundled tariff prices are \$0.09241/kWh for Production,
500 \$0.00796/kWh for Transmission, and \$0.06049/kWh for Distribution².

501 The example above is our unbundling approach for a tariff with only an energy
502 and fixed charge. For tariffs which include demand charges, we used the Demand classes
503 of Production Demand, Transmission Demand, and Distribution Demand to set the ratios.

504 VI. **CUSTOMER CREDITS FOR DISTRIBUTED ENERGY RESOURCES**

505 Q. **What challenges does PREPA face in developing a tariff which compensates
506 customers for operating DER?**

507 A. Act 57 and Act 4 reflect a policy that PREPA promote distributed / renewable resources.
508 However, Act 57 and Act 4 also reflect a general policy that tariffs should be cost-based
509 while also avoiding cross-subsidies, albeit along with other policies, some of which are

² Direct Assignment was grouped in within the Distribution function.

510 competing. Therefore, a pricing strategy has been developed which complies with the
511 above competing goals.

512 Q. **Please describe the challenges faced when developing pricing for DER?**

513 A. There are several challenges.

514 1. Customers without DER are subsidizing customers with DER. As is shown in
515 PREPA Ex. G-1 of the ECOSS, the required increased for Tariff GRS 112
516 customers, under which a typical residential customer would fall, with DER is
517 538 percent compared to 47 percent for those customers without DER.

518 2. Most of PREPA's tariffs are bundled and DER customers require unbundled
519 service because they are serving some of their needs with the DER. However, the
520 price signal from the bundled tariff does not differentiate those products which are
521 needed and unneeded, which triggers cross-subsidies which could negatively impact
522 both participating and non-participating customers.

523 3. Many of the DER technologies which are being installed (e.g., photovoltaic) are
524 intermittent in nature and therefore need firm capacity to back up the service
525 provided by these units.

526 4. The costs of distribution and transmission systems are currently bundled with
527 generation costs. Therefore, no mechanism exists to properly compensate the
528 utility (and thus avoid cross-subsidies from other customers) for the costs incurred
529 by these customers.

530 Q. **What are the potential solutions which PREPA could adopt in regard to DERs?**

531 A. Some potential solutions are as follows:

532 1. Generation operating behind the meter avoids the incremental cost of the tariff
533 under which the customer is served. In the case of tariffs with very high
534 volumetric charge such as Tariff GRS, the compensation provided to consumers
535 could be as high as \$0.17409³ cents per kWh.

536 2. PREPA could adopt an avoided cost standard such as is articulated in the Public
537 Utilities Regulatory Policy Act of 1978 (“PURPA”). PURPA specified that
538 Qualifying Facilities (“QF”) be paid avoided costs. Testimony sponsored by
539 Mr. Shlatz for the marginal cost study (PREPA Ex. 9.0) has provided estimates of
540 marginal costs which, for a high load factor customer, could range from
541 \$0.081/kWh to \$0.090/kWh based upon voltage.

542 Q. **What is the proposed solution for non-renewable DER equipment?**

543 A. Consistent with PURPA we propose that PREPA adopt an avoided cost standard
544 consistent with PURPA for electric generation. Generators would be compensated based
545 upon avoided cost. The avoided cost calculation would include a component equal to
546 avoided energy costs, avoided generation capacity costs and avoided distribution capacity
547 costs.

548 Q. **What is the primary advantage of an avoided cost standard?**

549 A. The primary advantage of an avoided cost standard is that participating customers are
550 provided a level of compensation equal to the avoided cost of the utility which avoids
551 cross-subsidization. A level compensation in excess of avoided cost would trigger
552 increased costs to non-participating customers.

³ This value includes CILT and Subsidies.

553 Q. **Do any shortcomings exist to using the avoided cost standard?**

554 A. It could be argued that the avoided cost standard undercompensates DER operators
555 because:

- 556 1. The price signal for generation is short-run and will not sustain new investment,
557 2. Environmental externalities are ignored if the cost of externalities is not captured
558 in the avoided cost estimates, and
559 3. The cost of the transmission and distribution system are ignored.

560 Q. **Are the avoided costs which have been adopted from the marginal cost study short-
561 run estimates?** R
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562 A. No, they are long-run. The capacity component of generation, transmission, and
563 distribution costs have been included in the estimates. For reasons discussed below,
564 transmission expenses have not been included. The energy costs reflect the expected
565 MEC for FY 2017. Our proposal is to update the MEC annually to reflect electric market
566 conditions.

567 Q. **Were the marginal costs of transmission and distribution included in the avoided
568 cost estimates?**

569 A. The avoided cost of transmission is zero, which is explained in Mr. Shultz's testimony.
570 However, an marginal distribution cost of \$35.63/kW-yr has been included in the avoided
571 cost estimate.

572 Q. **What is your proposal for providing a credit for customers operating renewable
573 DER?**

574 A. PREPA faces a different legal standard from renewable resources. In brief, PREPA is
575 required to support the development of these resources. We therefore propose a full
576 credit equal to each customer's energy charge (excluding CILT, Subsidies, and
577 Securitization). These credits are demonstrated in each rate-specific tariff below⁴.

578 Q. **Given the level of compensation afforded these customers what impact will the net
579 metering customers have on other customers?**

580 A. Net metering customers will increase the rates to non-participating customers. The
581 reason for the increased rate pressure is that the level of compensation afforded these
582 customers exceeds the costs which the balance of the customers are avoiding.

583 Q. **How significantly are NEM customers being subsidized using the proposed credit?**

584 A. Using Tariff GRS as an example, the total subsidy for NEM customers is \$0.07086/kWh,
585 which is the GRS energy charge of \$0.16086/kWh minus the upper bound of the
586 marginal energy cost of \$0.090/kWh, representing a 79⁵% premium which would need to
587 be recovered from other customers. The lifecycle cost of a rooftop photovoltaic unit is
588 estimated to be \$0.1478/kWh.

589 Q. **Do you recommend that the cost recovery for the excess compensation for NEM
590 customers be recovered in any specific manner?**

591 A. Yes. The excess of the compensation above avoided cost should be recovered through
592 the subsidies rider. Our rationale for this treatment is to explicitly recognize that the

⁴ LRS, RFR, and RH3 customer classes were excluded from Net Metering, as they are low income customers who are already being heavily subsidized.

⁵ $0.16086/0.090 = 1.79$.

593 premium paid over avoided cost is triggering cost shifting to other customer groups
594 which is increasing their average price.

595 Q. **Do you believe that the current NEM pricing policy should be continued in the
596 future.**

597 A. No. The policy is providing compensation to customers for the unbundled cost of
598 transmission which has a marginal cost of zero and the unbundled cost of distribution
599 which has a marginal cost which is less than the avoided cost. These network costs
600 should be non-bypass able. NEM customers are using these systems but allowed to avoid
601 payment for these assets. The current policy will not provide for the economic
602 sustainability of PREPA and triggers cross-subsidies to other customers.

603 **VII. OTHER TARIFF PROPOSALS**

604 Q. **Are you proposing any new tariffs?**

605 A. We are proposing two riders which are designed to encourage economic growth in Puerto
606 Rico and to retain / get back load which is lost due to non-economic bypass.

607 Q. **Please describe the economic development rider.**

608 A. The economic development rider would provide a negotiated discount for a period of
609 three to five years in exchange for creating new jobs on the island.

610 Q. **How would the discount be determined?**

611 A. We recommend that the level of discount be negotiated and driven by the level
612 employment created and the cost to serve the load.

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613 Q. **Would the Energy Commission be allowed to review the proposed discount?**

614 A. Yes. PREPA would not be allowed to implement the tariff until it is reviewed and
615 approved by the Energy Commission.

616 Q. **Please describe the load retention rider?**

617 A. PREPA's average cost are significantly above their marginal costs. Therefore, any new
618 load reduced average costs to all customers. Conversely, if load is lost a high probability
619 that costs will increase to all customers. As a result, the PREPA desires to have the
620 flexibility to selectively discount tariffs is a verified risk can be demonstrated that load
621 will be lost.

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622 Q. **Please describe the process that PREPA will follow.**

623 A. The process that PREPA will follow is described below:

- 624 1. After a threat of loss of load has been identified PREPA will prepared a detailed
625 analysis of the cost of service the incremental load. Marginal cost analysis would
626 be used to perform the analysis.
- 627 2. The revenues the customer would pay under existing tariffs would be quantified
628 and compared to the cost to serve that load.
- 629 3. The cost of the customers' bypass threat would be estimated. The bypass threat
630 could be any number of technologies and would be specific to each customer.
- 631 4. The necessary discount would be negotiated with the customer by PREPA and
632 filed as a confidential document with the Energy Commission. The Energy
633 Commission would review the submission and rule on its validity. If approved,
634 the negotiated discount would be implemented by PREPA.

635 Q. **Is PREPA also submitting any rider at the direction of the Commission?**

636 A. Yes, an energy efficiency rider.

637 Q. **Please describe the energy efficiency rider.**

638 A. The Energy Commission has requested that PREPA submit such a rider in our rate
639 request. We have complied to the best extent possible given the limited amount of
640 information on any energy efficiency programs which will ultimately be implemented.

641 Q. **How will the rider operate?**

642 A. For any costs incurred for energy efficiency programs, PREPA will be able to recover
643 those costs, plus working capital, on a cash basis. The rider will reconcile quarterly in
644 conjunction with the fuel and purchased power cost adjustments

645 Q. **PREPA currently provides a fuel oil subsidy for certain low-usage residential
646 customers. How is it incorporated into your proposed rate design?**

647 A. PREPA currently provides a fuel oil subsidy for select residential customers. While we
648 do not propose changing which customers receive this subsidy, we do believe the subsidy
649 structure could be simplified.

650 PREPA's current structure provides a different level of subsidy based on the
651 usage up to 425kWh. The subsidy decreases as customer usage increases. Any user
652 between 400kWh and 425kWh are required to receive the same total \$ subsidy. Navigant
653 believes that the current system of a graduated subsidy is complex and difficult to
654 administer. Therefore, it is proposed to apply a 34 percent discount to fuel costs for all

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655 customers using less than 400 KWH. For customers using between 400 and 425 KWH
656 will receive the same discount on a dollar basis as a customer using 400 KWH.

657 **VIII. PROPOSED TARIFF DESIGNS**

658 Q. **Have you prepared a proposed Base Rate Pricing Design for PREPA?**

659 A. Yes. The proposed Base Rate Pricing Design for each tariff is detailed in PREPA
660 Schedules H-2 and H-3, which is a proposal based upon the revenue requirement
661 associated with the restructuring. An alternative rate design is included as PREPA
662 Schedule N-1, which is based upon the non-restructuring revenue requirement.

663 Q. **Would you please describe the current tariffs?**

664 A. The existing tariffs are antiquated and do not reflect the existing cost structure of the
665 utility. This shortcoming triggers the inefficient consumption of electric power by
666 PREPA's customers which in the long-run increases costs.

667 Q. **When was the last tariff review performed by PREPA?**

668 A. We are informed by the management of PREPA that the last change to tariffs occurred in
669 1989. However, that adjustment did not address the structure of the tariffs but simply
670 changed the level of the charges. The last time the structure of the tariffs was updated
671 was 1979.

672 Q. **What process did you follow to update the tariffs?**

673 A. The process we followed (this work generally was performed in the first instance by
674 Mr. Zarumba) is summarized below:

675 5. Review existing tariff structures. We made a complete review of the existing
676 tariffs structures, their design and determined the type(s) of customers served.

677 6. Determined revenue sufficiency. We compared the revenues produced by each
678 tariff with the results of the ECOSS.

679 7. Evaluated the pricing design of each tariff with the results of the Marginal Cost
680 study. We used the marginal cost study to provide information on the economic
681 cost to serving customers, the appropriateness of the tariff element design and
682 price level.

683 8. Develop proposed tariffs. We developed proposed tariffs based upon the analyses
684 described above. After the initial proposals were developed, we performed
685 detailed rate impact studies based, evaluated the results and adjusted the tariff
686 design as appropriate.

687 Q. Have you considered using fixed charges to pay PREPA's obligations to
688 bondholders?

689 A. Yes, Schedule L-1 is included where PREPA's obligations to bondholders are allocated
690 to all customers by non-CILT kWh Sales. For non-residential customers a volumetric
691 charge was created, and for residential customers a per-service-agreement charge was
692 created. We did not adopt this concept for rate design.

693 A. Tariff Design Proposals

694 Q. Please list the tariff designs you have included in your testimony.

695 A. The tariff designs we have provided are as follows:

- 696 1. Schedule M-1. A rate design which adopts a fixed monthly charge equal to the
697 incremental cost to serve that customer; demand charges where appropriate; and
698 energy charges to recover the balance of the revenue requirement.
- 699 2. Schedule M-2. An unbundled rate design proposal. PREPA's actual proposal
700 includes unbundling, along with other features, as we discussed earlier.
- 701 3. Schedule M-3. The tariff design proposed by PREPA.
- 702 4. Schedule N-1. The proposed tariff design assuming that a Formula Rate
703 Mechanism is not adopted. This scenario assumes that the restructuring agreement
704 has been rejected because formula ratemaking is a requirement of the
705 Restructuring Support Agreement ("RSA").

706 Please note that the following discussion of the proposed rate design thus applies to
707 Schedule M-3.

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708 **B. Tariff GRS**

709 **Q. What is Tariff GRS?**

710 A. Tariff GRS is PREPA's general service tariff applicable to residential (i.e., domestic)
711 customers that have not been placed into a residential Lifeline tariff. Tariff GRS
712 currently captures approximately 86 percent of residential sales as measured in kWh, as
713 well as approximately 31 percent of all sales as measured in kWh. Encompassing 76% of
714 customers, GRS is PREPA's largest tariff by both customers served and kWhs sold.

715 **Q. Please describe the existing design of Tariff GRS.**

716 A. Tariff GRS contains a fixed charge of \$3.00 per month, a first block energy charge of
717 \$0.04350 for the initial 425 kWh used, and a second block energy charge of \$0.04970 for

718 all consumption in excess of 425 kWh. The FCA and PPCA apply to this tariff, and are
719 accounted for by varying volumetric charges, depending on market pricing of fuel. A
720 subset of GRS customers receive the fuel oil subsidy.

721 Q. **Please provide your assessment of the design of Tariff GRS.**

722 A. No rationale exists for the inverted energy charge. The energy charges, for both the first
723 and second blocks, are significantly in excess of the bundled marginal cost to serve these
724 customers when the existing FCA and PPCA are included.

725 Q. **What is the proposed Tariff GRS design?**

726 A. Inasmuch as the ECOSS indicates that an increase of 50 percent is justified for this tariff
727 class, such an increase would trigger significant rate shock for these customers.
728 Therefore, a rate increase of 28.6 percent, including the Transition Charge, is proposed
729 for these customers, after adopting the aforementioned mitigation approach.

730 The initial Transition Charge for residential customers is proposed to be \$11.98.
731 Due to this large fixed charge, the existing fixed charge for the GRS class has been
732 removed entirely. However, if the Energy Commission rejects or alters the SPV proposal,
733 PREPA may wish to revise our residential rate design. Further, even if the Energy
734 Commission accepts the Company's proposal we find it reasonable to include a fixed
735 charge in base rates in the future.

736 Additionally, we see no cost justification to the inverted block rate design because
737 the prices necessary to recover the revenue requirement significantly exceed bundled
738 marginal cost. For example, the marginal cost at a secondary voltage is \$0.093/kWh.

739 Instead, we propose a single energy charge which captures the average cost of
740 fuel and purchased power in the test year. This charge will be further unbundled to show
741 the exact volumetric charge for each energy piece, which includes generation,
742 transmission, and distribution. The resulting all-in energy charge is \$0.16086 per kWh.
743 On their bill, the customer will see a \$0.09242 per kWh Generation Energy Charge, a
744 \$0.00796 per kWh Transmission Energy Charge, and a \$0.06050 per kWh Distribution
745 Energy Charge.

746 Finally, there will be a small volumetric charge for both CILT and Subsidies,
747 which will be priced at \$0.00303 per kWh and \$0.01020 per kWh, respectively.⁶

748 **Q. Have you estimated customer impacts based upon the proposed rate design?**

749 **A.** Yes. Detailed rate impacts have been calculated for all customers. The results of this
750 analysis are detailed in PREPA Schedule H-4a.

751 **C. Tariff RH3**

752 **Q. What is Tariff RH3?**

753 **A.** Tariff RH3 is PREPA's tariff applicable to Government administered residential Public
754 Housing use. There are two sub-classes of the RH3 tariff, one pertaining to customers
755 which consume over 425 kWh a month, and another that pertains to customers with a
756 subsidized cost of fuel that consume less than 425 kWh a month.

757 **Q. Please describe the existing design of Tariff RH3.**

⁶ Earlier in our testimony, we described the revised FCA and PPCA mechanisms. We will not repeat that discussion in Section VIII(B) through (R) of our testimony.

758 A. Tariff RH3 contains a fixed charge of \$2.00 per month, a first block energy charge of
759 \$0.00100 for the initial 425 kWh consumed, and a second block energy charge of
760 \$0.03300 for all consumption in excess of 425 kWh. The FCA and PPCA apply to this
761 tariff, and are accounted for by varying volumetric charges, depending on market pricing
762 of fuel. All RH3 customers with usage under 425 kWh receive the fuel oil subsidy.

763 Q. **Please provide your assessment of the design of Tariff RH3.**

764 A. Tariff RH3 is a lifeline tariff provided to low income customers. An inverted block rate
765 design is appropriate because it would be undesirable to offer a discount for unlimited
766 usage.

767 Q. **What is the proposed Tariff RH3 design?**

768 The proposed RH3 tariff will retain the inverted block structure, with a first block energy
769 charge of \$0.10211 for the first 425 kWh, and a second block charge of \$0.16086 for all
770 consumption in excess of 425 kWh. The second block energy charge is set to the GRS
771 fully bundled energy charge. These two charges will include the FCA and PPCA.
772 Additionally, the existing fixed charge of \$2.00 will be removed, as the residential
773 transition charge is expected to be \$11.98 a month. Finally, RH3 will also have a CILT
774 charge of \$0.00303 per kWh. RH3 will incur no subsidy charge due to their status as a
775 lifeline class.

776 Q. **Have you estimated customer impacts based upon the proposed rate design?**

777 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
778 analysis are detailed in PREPA Schedule H-4b.

779 **D. Tariff LRS**

780 Q. **What is Tariff LRS?**

781 A. Tariff LRS is PREPA's tariff applicable to residential customers who fulfill the
782 Nutritional Assistance Programs. There are two sub-classes of the LRS tariff, one
783 pertaining to customers with a subsidized cost of fuel which must consume under 425
784 kWh a month, and another that pertains to customers with no consumption limitations.

785 Q. **Please describe the existing design of Tariff LRS.**

786 A. Tariff LRS contains a fixed charge of \$3.00 per month, a first block energy charge of
787 \$0.01460 for the initial 425 kWh and a second block energy charge of \$0.04970 for all
788 consumption in excess of 425 kWh. The FCA and PPCA apply to this tariff, and are
789 accounted for by varying volumetric charges, depending on market pricing of fuel.

790 Q. **Please provide your assessment of the design of Tariff LRS.**

791 A. Similar to tariff RH3, tariff LRS is a lifeline tariff provided to low income customers. An
792 inverted block rate design is appropriate because it would be undesirable to offer a
793 discount for unlimited usage.

794 Q. **What is the proposed Tariff LRS design?**

795 The LRS proposed class Tariff will retain the inverted block charge structure, with a first
796 block charge of \$0.13239 for the first 425 kWh, and a second block charge of \$0.16086
797 for all consumption in excess of 425 kWh. The second block energy charge is set to the
798 GRS fully bundled energy charge. These two charges will include FCA and PPCA.
799 Additionally, the existing fixed charge of \$3.00 will be removed, as the residential

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800 transition charge is expected to be \$11.98 a month. Finally, LRS will also have a CILT
801 charge of \$0.00303 per kWh. LRS will incur no subsidy charge due to their status as a
802 lifeline class.

803 Q. **Have you estimated customer impacts based upon the proposed rate design?**

804 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
805 analysis are detailed in PREPA Schedule H-4c.

806 E. **Tariff RFR**

807 Q. **What is Tariff RFR?**

808 A. Tariff RFR is PREPA's tariff applicable to customers that live in public housing under
809 the Public Housing Administration and decide to apply for a low-income fixed rate.
810 There are three sub-classes of tariff RFR, one of which pertains to customers that live in
811 one room housing, another pertains to customers that live in two-three room housing, and
812 the final sub-class pertains to four or five room housing.

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813 Q. **Please describe the existing design of Tariff RFR.**

814 A. Tariff RFR contains separate rates for each of the tariff's three sub-classes, all of which
815 contain identical structures of a fixed charge and an energy charge applied to energy
816 consumption in excess of a predetermined amount. Tariff RFR 105 has a fixed charge of
817 \$30.00 per month and an energy charge of \$.05 for all consumption in excess of 600
818 kWh. Tariff RFR 106 has a fixed charge of \$40.00 per month and an energy charge of
819 \$.05 for all consumption in excess of 800 kWh. Tariff RFR 107 has a fixed charge of

820 \$50.00 per month and an energy charge of \$.05 for all consumption in excess of 1000
821 kWh. The FCA and PPCA do not apply to tariff RFR.

822 Q. **Please provide your assessment of the design of Tariff RFR.**

823 A. The structure of RFR is legislatively mandated. As a result, we have adopted the rate
824 designed mandated per legislation, with the exception of the transition charge, which has
825 been added.

826 Q. **What is the proposed Tariff RFR design?**

827 A. Per recent legislation, the RFR tariff will remain largely unchanged, as the fixed charges
828 and the kWh thresholds will be the same. However, each of the three sub-tariffs will now
829 have an excess energy charge that is equal to the fully bundled energy charge given to
830 GRS customers, which is \$0.16086 per kWh. In addition, all excess kWh will include the
831 CILT charge of \$0.00303.

832 Q. **Have you estimated customer impacts based upon the proposed rate design?**

833 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
834 analysis are detailed in PREPA Schedule H-4d.

835 F. **Tariff GSS**

836 Q. **What is Tariff GSS?**

837 A. Tariff GSS is PREPA's tariff applicable to non-residential customers at a secondary
838 distribution voltage with an overall load that is less than 50 kVA. Tariff GSS currently
839 captures 12 percent of all sales as measured in kWh.

840 Q. **Please describe the existing design of Tariff GSS.**

841 Tariff GSS contains a fixed charge of \$5.00 per month and a volumetric energy charge of
842 \$0.07670 per kWh. The FCA and PPCA apply.

843 Q. **Please provide your assessment of the design of Tariff GSS.**

844 A. Tariff GSS is serving an overly broad group of customers. An argument exists for it to be
845 broken into multiple tariffs. However, information is not available at this time for an
846 informed redesign of this tariff.

847 Q. **What is the proposed Tariff GSS design?**

848 A. The fixed charge for GSS will be increased from \$5.00 to \$10.00. Like tariff GRS, the
849 GSS energy charges will be unbundled to show the charge for generation, transmission,
850 and distribution. The all in energy charge of GSS will be \$.17509 per kWh. On their
851 bill, a customer will see a Generation Energy Charge of \$.10937 per kWh, a
852 Transmission Energy Charge of \$.01092 per kWh, and a Distribution Energy Charge of
853 \$.05480 per kWh. GSS will also pay a CILT charge of \$.00303, as well as a subsidy
854 charge of \$.01020. Finally, GSS will pay the non-residential transition charge, which is
855 estimated to be \$.03055 per kWh.

856 Q. **Have you estimated customer impacts based upon the proposed rate design?**

857 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
858 analysis are detailed in PREPA Schedule H-4e.

859 G. **Tariff GSP**

860 Q. **What is Tariff GSP?**

861 A. Tariff GSP is PREPA's general service tariff for customers at primary distribution
862 voltage. Tariff GSP currently captures 26 percent of all sales as measured in kWh, and is
863 PREPA's second largest tariff.

864 Q. **Please describe the existing design of Tariff GSP.**

865 A. Tariff GSP contains a fixed charge of \$200.00 per month, a first block energy charge of
866 \$0.03600 for the first 300 kWh per kW of max demand, and a second block energy
867 charge of \$0.02800 for consumption over 300 kWh per kW of max demand. The FCA
868 and PPCA apply. GSP customers also pay a ratcheted demand charge of \$8.10 per kVA,
869 as well as an excess demand charge of \$10.00 per kVA.

870 Q. **Please provide your assessment of the design of Tariff GSP.**

871 A. Our assessment is (1) the definition of the demand charge is overly complex and without
872 cost justification, and (2) the load factor rate design for the energy charges is also without
873 cost justification.

874 Q. **What is the proposed Tariff GSP design?**

875 A. The GSP fixed charge will remain at \$200.00 per month. The inverted block charges will
876 be removed, and replaced with a single energy charge of \$0.11116 per kWh. GSP
877 customers will also have a CILT charge of \$.00303 per kWh, as well as the subsidy
878 charge of \$.01020 per kWh. The GSP demand charge will be unbundled into generation,
879 transmission, and distribution, with charges of \$7.79, \$1.64, and \$2.57 per kVA
880 respectively. The demand charges will be based on un-ratcheted kVA per month, and

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881 there will be no excess demand charge. GSP will also pay the non-residential transition
882 charge, which is estimated to be \$.03055 per kWh.

883 Q. **Have you estimated customer impacts based upon the proposed rate design?**

884 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
885 analysis are detailed in PREPA Schedule H-4f.

886 H. **Tariff TOU-P**

887 Q. **What is Tariff TOU-P?**

888 A. Tariff TOU-P is PREPA's time-of-use tariff for customers at primary distribution
889 voltage.

890 Q. **Please describe the existing design of Tariff TOU-P.**

891 A. Tariff TOU-P contains a fixed charge of \$200.00 per month, an on-peak energy charge of
892 \$0.05000 for on-peak kWh, and an off-peak energy charge of \$0.01100 for all
893 consumption of off-peak kWh. Tariff TOU-P also includes an on-peak demand charge of
894 \$8.10 per kVA during on-peak hours, and an off-peak demand charge of \$1.10 per kVA
895 during off-peak hours. The FCA and PPCA apply.

896 The on-peak period is currently defined as 9:00 a.m. to 10:00 p.m. during
897 weekdays (Monday-Friday), excluding certain Holidays⁷. All other hours are defined as
898 off-peak.

899 Q. **Please provide your assessment of the design of Tariff TOU-P.**

⁷ This includes the following Holidays: New Year's Day; Three Kings Day; Good Friday; United States Independence Day; Constitution of the Commonwealth of Puerto Rico; Labor Day; Discovery of Puerto Rico; Thanksgiving Day; Christmas Day.

900 A. The definition of the on-peak period is inconsistent with the results of the aforementioned
901 rating period analysis.

902 Q. **How do you recommend reconciling the difference between the rating period study
903 and the on-peak period defined in TOU-P?**

904 A. Given the vastness of other changes, we recommend keeping the on-peak definition as is
905 currently defined, but closing time of use tariffs to new customers. As mentioned in the
906 rating period analysis, we would then re-evaluate this discrepancy in a later rate case.

907 Q. **What is the proposed Tariff TOU-P design?**

908 A. The TOU-P fixed charge of \$200.00 per month will remain unchanged. The on-peak
909 energy charge will be \$0.10616, while the off-peak energy charge will be \$0.09116.
910 TOU-P will also pay the CILT charge of \$0.00303 per kWh, as well as the subsidy
911 charge of \$0.01020 per kWh. The TOU-P demand charge will be unbundled into
912 generation, transmission, and distribution, with charges of \$7.79, \$1.64, and \$2.57 per
913 kVA respectively. These are the same unbundled demand charges applied to GSP, and
914 similarly to GSP, will be based on un-ratcheted demand, and will not include an excess
915 demand charge. TOU-P will also pay the non-residential transition charge, which is
916 estimated to be \$.03055 per kWh.

917 Q. **Have you estimated customer impacts based upon the proposed rate design?**

918 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
919 analysis are detailed in PREPA Schedule H-4g.

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920 **I. Tariff GST**

921 Q. **What is Tariff GST?**

922 A. Tariff GST is PREPA's general industrial service tariff for transmission customers. Tariff
923 GST currently captures 19 percent of sales as measured in kWh.

924 Q. **Please describe the existing design of Tariff GST?**

925 A. Tariff GST contains a fixed charge of \$450.00 per month, a first block energy charge of
926 \$0.02800 for the first 300 kWh per KW of max demand, and a second block energy
927 charge of \$0.02400 for consumption over 300 kWh per KW of max demand. The FCA
928 and PPCA apply. GST also contains a demand charge of \$7.70 per kVA, and an excess
929 demand charge of \$9.60 per kVA.

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930 Q. **Please provide your assessment of the design of Tariff GST.**

931 A. GST is structurally identical to GSP and it suffers from similar shortcomings as described
932 above.

933 Q. **What is the proposed Tariff GST design?**

934 A. The GST fixed charge of \$450.00 per month will remain unchanged. The block structure
935 energy charges will be removed, and replaced with a single energy charge of \$0.10002
936 per kWh. GST will also pay the CILT charge of \$0.00303 per kWh, as well as the
937 subsidy charge of \$0.01020 per kWh. The GST demand charge will be unbundled into
938 generation and transmission, but there will be no distribution demand charge. Generation
939 demand will be \$7.79 per kVA, and transmission will be \$1.64 per kVA. There will be no

940 excess demand charge. GST will also pay the non-residential transition charge, which is
941 estimated to be \$.03055 per kWh.

942 Q. **Have you estimated customer impacts based upon the proposed rate design?**

943 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
944 analysis are detailed in PREPA Schedule H-4h.

945 J. **Tariff LIS**

946 Q. **What is Tariff LIS?**

947 A. Tariff LIS is PREPA's tariff for large industrial customers, defined as industries
948 connected to 115 kV service with a demand equal to or higher than 12,000 kW and less
949 than 25,000 kW. LIS customers are also required to have a minimum of 0.8 load factor.

950 Q. **Please describe the existing design of Tariff LIS.**

951 A. Tariff LIS contains a fixed charge of \$450.00 per month, a first block energy charge of
952 \$0.01600 for the first 584 kWh per kW of max demand, and a second block energy
953 charge of \$0.01000 for consumption over 584 kWh per kW of max demand. Tariff LIS
954 also contains both a demand charge of \$6.00 per kVA, and an excess demand charge of
955 \$9.60 per kVA. The FCA and PPCA apply.

956 Q. **Please provide your assessment of the design of Tariff LIS.**

957 A. LIS is structurally identical to GSP and it suffers from similar shortcomings as described
958 above. Additionally, we could find no justification for the 584 kWh per kW of max
959 demand block definition.

960 Q. **What is the proposed Tariff LIS design?**

961 A. The LIS fixed charge of \$450.00 per month will remain unchanged. The block structure
962 energy charges will be removed, and replaced with a single energy charge of \$0.09002
963 per kWh. LIS will also pay the CILT charge of \$0.00303 per kWh, as well as the subsidy
964 charge of \$0.01020 per kWh. The LIS demand charge will be unbundled into generation
965 and transmission, but there will be no distribution demand charge. Generation demand
966 will be \$7.79 per kVA, and transmission will be \$1.64 per kVA. The basis demand will
967 be un-ratcheted, and there will be no excess demand charge. LIS will also pay the non-
968 residential transition charge, which is estimated to be \$0.03055 per kWh.

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969 Q. **Have you estimated customer impacts based upon the proposed rate design?**

970 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
971 analysis are detailed in PREPA Schedule H-4i.

972 K. **Tariff TOU-T**

973 Q. **What is Tariff TOU-T?**

974 A. Tariff TOU-T is PREPA's time of use tariff for customers at transmission voltage.

975 Q. **Please describe the existing design of Tariff TOU-T?**

976 A. Tariff TOU-T contains a fixed charge of \$450.00 per month, an on-peak energy charge of
977 \$0.03900 for on-peak kWh, and an off-peak energy charge of \$0.01000 for all
978 consumption of off-peak kWh. Tariff TOU-T also includes an on-peak demand charge of
979 \$7.70 per kVA during on-peak hours, and an off-peak demand charge of \$1.00 per kVA
980 during off-peak hours. The FCA and PPCA apply.

981 The peak time definitions are identical to that of TOU-P, as mentioned above.

982 Q. **Please provide your assessment of the design of Tariff TOU-T.**

983 A. TOU-T is structurally identical to TOU-P and it suffers from similar shortcomings as
984 described above. We also propose to disallow new customers to this tariff.

985 Q. **What is the proposed Tariff TOU-T design?**

986 A. The TOU-T fixed charge of \$450.00 per month will remain unchanged. The on-peak
987 energy charge will be \$0.09502 per kWh, and the off-peak energy charge will be
988 \$0.08002 per kWh. TOU-T will also pay the CILT charge of \$0.00303 per kWh, as well
989 as the subsidy charge of \$0.01020 per kWh. The TOU-T demand charge will be
990 unbundled into generation and transmission, but there will be no distribution demand
991 charge. Generation demand will be \$7.79 per kVA, and transmission will be \$1.64 per
992 kVA. The basis for demand will be un-ratcheted, and there will be no excess demand
993 charge. TOU-T will also pay the non-residential transition charge, which is estimated to
994 be \$0.03055 per kWh.

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995 Q. **Have you estimated customer impacts based upon the proposed rate design?**

996 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
997 analysis are detailed in PREPA Schedule H-4j.

998 L. **Tariff SBS**

999 Q. **What is Tariff SBS?**

1000 A. Tariff SBS is PREPA's standby service tariff.

1001 Q. **Please describe the existing design of Tariff SBS.**

1002 A. Tariff SBS currently mimics the structures of GST and TOU-T. However, the only two
1003 customers on the SBS tariff use the TOU-T structure, which contains a fixed charge of
1004 \$450.00 per month, an on-peak energy charge of \$0.03900 for on-peak kWh, and an off-
1005 peak energy charge of \$0.01000 for all consumption of off-peak kWh. Tariff SBS also
1006 includes an on-peak demand charge of \$7.70 per kVA during on-peak hours, and an off-
1007 peak demand charge of \$1.00 per kVA during off-peak hours. The FCA and PPCA
1008 apply.

1009 Q. **What is the proposed Tariff SBS design?**

1010 A. Tariff SBS is proposed to be closed and all customers moved to GST, given the fact that
1011 TOU-T will be locked to additional customers.

1012 Q. **Have you estimated customer impacts based upon the proposed rate design?**

1013 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
1014 analysis are detailed in PREPA Schedule H-4k.

1015 M. **Tariff GAS**

1016 Q. **What is Tariff GAS?**

1017 A. Tariff GAS is PREPA's general service tariff for agricultural customers.

1018 Q. **Please describe the existing design of Tariff GAS.**

1019 A. Tariff GAS contains a fixed charge of \$10.00 per month, and a single energy charge of
1020 \$0.05400 per kWh. The FCA and PPCA apply.

1021 Q. **What is the proposed Tariff GAS design?**

1022 A. The GAS fixed charge will remain at \$10.00 per month. The energy charge will be
1023 increased to \$0.15303 per kWh. GAS will also pay the CILT charge of \$0.00303 per
1024 kWh, and the subsidy charge of \$0.01020 per kWh. GAS will also pay the non-residential
1025 transition charge, which is estimated to be \$0.03055 per kWh.

1026 Q. **Have you estimated customer impacts based upon the proposed rate design?**

1027 A. Yes. Detailed rate impacts have been calculated for all customers. The results of this
1028 analysis are detailed in PREPA Schedule H-4l.

1029 N. **Tariff PPBB**

1030 Q. **What is Tariff PPBB?**

1031 A. Tariff PPBB is PREPA's tariff for power producers at bus bar, and applies to AES and
1032 EcoElectrica.

1033 Q. **Please describe the existing design of Tariff PPBB.**

1034 A. Tariff PPBB contains a fixed charge of \$450.00 per month, and an energy charge of
1035 \$0.02610 per kWh. Tariff PPBB also includes a demand charge of \$7.40 per kVA, and an
1036 excess demand charge of \$10.00 per kVA. The FCA and PPCA apply.

1037 Q. **What is the proposed Tariff PPBB design?**

1038 A. The PPBB fixed charge of \$450.00 per month will remain unchanged. The energy charge
1039 will be increased to \$0.09022 per kWh. PPBB will also pay the CILT charge of \$0.00303
1040 per kWh, as well as the subsidy charge of \$0.01020 per kWh. PPBB will have a
1041 generation demand charge of \$7.79 per kVA. There will be no excess demand charge.

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1042 PPBB will pay the non-residential transition charge, which is estimated to be \$0.03055
1043 per kWh.

1044 **O. Tariff PLG**

1045 Q. **What is Tariff PLG?**

1046 A. Tariff PLG is comprised of PREPA's public lighting tariffs.

1047 Q. **Please describe the existing design of Tariff PLG.**

1048 A. Tariff PLG contains a separate volumetric energy charge depending on the type of light
1049 being used. The FCA and PPCA apply.

1050 Q. **What is the proposed Tariff PLG design?**

1051 A. Tariff PLG will retain all current lighting tariff structures, but the energy charge will be
1052 scaled up to match ECOS.

1053 **P. Tariff USSL**

1054 Q. **What is Tariff USSL?**

1055 A. Tariff USSL is PREPA's tariff for unmetered services.

1056 Q. **Please describe the existing design of Tariff USSL.**

1057 A. Tariff USSL contains a fixed charge of \$4.60 per month, and an energy charge of
1058 \$0.0767 per kWh.

1059 Q. **What is the proposed Tariff USSL design?**

1060 A. USSL will pay a fixed charge of \$4.60 per month, and an energy charge of \$0.18050 per
1061 kWh. USSL will also pay the CILT charge of \$0.00303 per kWh, and the subsidy charge

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1062 of \$0.01020 per kWh, as well as the non-residential transition charge, which is estimated
1063 to be \$0.03055 per kWh.

1064 **Q. Tariff CATV**

1065 **Q. What is Tariff CATV?**

1066 **A.** Tariff CATV is PREPA's tariff for Cable TV services.

1067 **Q. Please describe the existing design of Tariff CATV.**

1068 **A.** Tariff CATV contains a fixed charge of \$5.00 per month, and an energy charge of
1069 \$0.07670 per kWh.

1070 **Q. What is the proposed Tariff CATV design?**

1071 **A.** CATV will pay a fixed charge of \$5.00 per month, and an energy charge of \$0.17410 per
1072 kWh. CATV will also pay the CILT charge of \$0.00303 per kWh, and the subsidy charge
1073 of \$0.01020 per kWh, as well as the non-residential transition charge, which is estimated
1074 to be \$0.03055 per kWh.

1075 **R. Tariff LP-13**

1076 **Q. What is Tariff LP-13?**

1077 **A.** Tariff LP-13 is PREPA's tariff for sports field lighting where admission is collected.

1078 **Q. Please describe the existing design of Tariff LP-13.**

1079 **A.** Tariff LP-13 contains a first block charge of \$0.09000 for the first 100kWh of max
1080 demand, and a second block charge of \$0.08000 for excess of 100kWh of max demand.
1081 FCA and PPCA apply.

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1082 Q. **What is the proposed Tariff LP-13 design?**

1083 A. LP-13 will pay an energy charge of \$0.29374 per kWh. LP-13 will also pay the CILT
1084 charge of \$0.00303 per kWh, and the subsidy charge of \$0.01020 per kWh, as well as the
1085 non-residential transition charge, which is estimated to be \$0.03055 per kWh.

1086 IX. **CONCLUSION**

1087 Q. **Does this complete your direct testimony?**

1088 A. Yes.

P2
EA

ATTESTATION

Affiant, Ralph Zarumba, being first duly sworn, states the following:

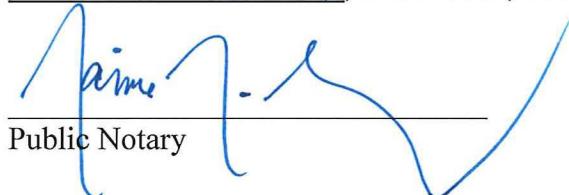
The prepared pre-filed Direct Testimony and the Schedules and Exhibits attached thereto and the Schedules I am sponsoring constitute the direct testimony of Affiant in the above-styled case. Affiant states that he would give the answers set forth in the pre-filed Direct Testimony if asked the questions propounded therein at the time of the filing. Affiant further states that, to the best of his knowledge, his statements made are true and correct.



Ralph Zarumba

Affidavit No. 3,578

Acknowledged and subscribed before me by Ralph Zarumba, of the personal circumstances above mentioned, in his capacity as a Director of Navigant Consulting, Inc., who is personally known to me or whom I have identified by means of his driver's license number from Illinois 2651-7345-9297, in San Juan, Puerto Rico, this 26th day of May 2016.


Public Notary



EXENTO PAGO ARANCEL
LEY 47
4 DE JUNIO DE 1982

ATTESTATION

Affiant, Eugene Granovsky, being first duly sworn, states the following:

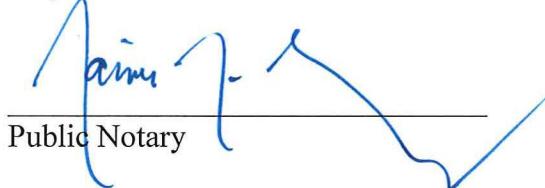
The prepared pre-filed Direct Testimony and the Schedules and Exhibits attached thereto and the Schedules I am sponsoring constitute the direct testimony of Affiant in the above-styled case. Affiant states that he would give the answers set forth in the pre-filed Direct Testimony if asked the questions propounded therein at the time of the filing. Affiant further states that, to the best of his knowledge, his statements made are true and correct.



Eugene Granovsky

Affidavit No. 3,579

Acknowledged and subscribed before me by Eugene Granovsky, of the personal circumstances above mentioned, in his capacity as a Managing Consultant at Navigant Consulting, Inc., who is personally known to me or whom I have identified by means of his driver's license number FRM Illinois 6-651-2008-4244, in San Juan, Puerto Rico, this 26 th day of May 2016.



Jaime J. Ortiz Rodriguez
Public Notary



EXENTO PAGO ARANCEL
LEY 47
4 DE JUNIO DE 1982

PREPA T&D Transaction Highlights



Key Reasons for Transaction

- A dated electrical system in poor condition
- Stability and reliability challenges
- Inconsistent customer support and collections operations
- Lack of access to modern workforce training and practices
- Workforce attrition and shortages
- Reduced revenues
- A lack of long-term planning and managerial continuity
- A geographic mismatch between supply and demand (i.e., generation concentrated in the South and demand mostly in the North)

PREPA's challenges were exacerbated by hurricanes Irma and Maria and the earthquakes that continue to strike Puerto Rico.

Key Transaction Objectives

- Create a modern, sustainable, reliable, efficient cost effective and resilient energy system
- Build an electric system that can adequately withstand future extreme weather and man-made events and with improved emergency preparedness
- Provide electric service at a reasonable cost by harnessing private sector experience and resources to maximize operational efficiency and financial stability in running the utility
- Provide the people of Puerto Rico with a more reliable T&D system (fewer and shorter outages)
- Bring incident rates, and other safety measures in line with industry standards
- Implement industry best practices and operational excellence through managerial continuity and long-term planning
- Secure maximum amounts of federal disaster assistance funding to help rebuild energy infrastructure in the aftermath of Hurricanes Maria and Irma
- Develop more responsive customer-centric service and measure customer satisfaction through an independent third-party
- Jumpstart a long-term revitalization of the Puerto Rican economy through the delivery of reliable and resilient electricity thereby bringing more investment to the island and supporting economic development

Highlights of Procurement Process

- 5 world-class RFQ participants
- 4 pre-qualified bidders participated in the RFP process
- 17,988 documents related to PREPA (totaling 149,181 megabytes of data), many of which had to be translated into English, uploaded to the Data Room for bidders to review
- Over 700 diligence questions asked and answered
- Over 20 extensive diligence calls and in-person meetings with bidders
- Over 7 drafts of transaction documents distributed to bidders for review and comment
- 8 in-person meetings to walk through and discuss bidder comments to transaction documents
- Over 19 Partnership Committee meetings to review and discuss elements of the transaction
- 2 RFP bids received from experienced industry leaders

Who is LUMA

LUMA is a Puerto Rico company owned by ATCO Ltd. (ATCO) and Quanta Services, Inc. (Quanta) that is working in conjunction with Innovative Emergency Management, Inc. (IEM) for its federal funding expertise.

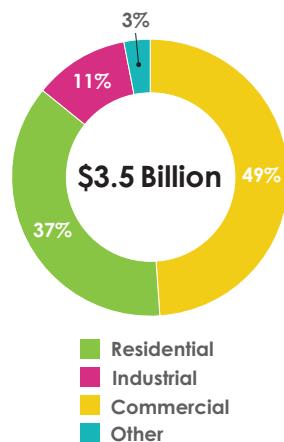
- ATCO – a diversified global holding corporation with decades of operational excellence managing several world-class utilities that deliver safe and reliable energy to millions of customers
- Quanta – an industry-leading infrastructure solutions provider with technical experience in building reliable, sustainable infrastructure and best-in-class craft skilled workforce training
- IEM – an expert in transparent management of federal funds with more than 35 years of experience helping the public and private sectors enhance preparedness, mitigate risks and effectively respond to and recover from disasters

LUMA will leverage the collective experience of:

- A combined workforce of more than 50,000 people
- The largest specialized fleet in North America
- Operating more than 52,000 miles of transmission and distribution lines covering 165,000 square miles of service territory
- Overseeing over \$51 billion in disaster recovery programs
- Supporting more than 300 state, local and territorial jurisdictions with a wide range of emergency management services

PREPA by the Numbers

Annual Revenues



Number of Customers



~1.5 million

- 91% residential
- 9% commercial
- 1% industrial & other

Number of Employees



~6,000

- 41% T&D employees
- 19% generation employees
- 40% other employees

Miles of T&D Lines



- 1,114 miles of transmission lines (230 KV / 115 KV)
- 1,376 miles of sub-transmission lines (38 KV)
- 16,035 miles of primary voltage distribution lines (13 KV, 8 KV, 4 KV)
- 339 PREPA-owned and 613 privately-owned substations

T&D Transaction by the Numbers

Anticipated Period to LUMA Takeover of Operations



~11 months

Projected Average Annual Operating Savings Over First Half of Term



\$169 million

- Savings 27% greater than average annual Service Fee for the period
- Cumulative net savings of \$323 million after payment of Service Fee

Incentive Fee Tied to Performance Metrics



- ✓ Improved reliability and resiliency
- ✓ Enhanced customer service
- ✓ Greater focus on safety

T&D Transaction Contract Terms

The O&M structure best addresses the objectives to maximize the use of federal funds for modernization of the electric grid and reform the sector to lower overall costs to consumers.

The O&M Contract provides that:

- Ownership of the T&D System remains with PREPA throughout the term
- Operator must (i) comply with specific operating standards and (ii) exceed certain performance benchmarks over the course of the term in order to earn its incentive fee
- Operator's compensation is part of the overall cost of operating the electric system in Puerto Rico, which is estimated at more than \$3 billion per year

LUMA will be responsible for all aspects of operating, managing, maintaining, repairing, restoring and improving the T&D system. This includes, among other things:

- Implementing the plan to remediate, repair, replace and stabilize the T&D system equipment, systems and services
- Procuring and administering federal funding
- Recommending and performing capital improvements
- Representing PREPA before PREB and preparing related filings and submission
- Providing improved customer service, including billing



Puerto Rico
Public-Private
Partnerships Authority

Principales Razones Para La Transacción

- Sistema eléctrico arcaico y en precarias condiciones
- Falta de estabilidad y confiabilidad del sistema
- Inconsistencia en el servicio al cliente y en las gestiones de cobro
- Falta de prácticas modernas de capacitación para la fuerza laboral
- Escasez de mano de obra para fuerza laboral
- Reducción consistente de ingresos
- Falta de planificación a largo plazo y de continuidad gerencial
- Falta de congruencia geográfica entre la oferta y la demanda. La generación está concentrada en el sur, mientras que la mayor demanda se encuentra principalmente en el norte.

Los retos de la Autoridad de Energía Eléctrica (AEE) fueron exacerbados por los huracanes Irma y María, y los terremotos que continúan afectando a Puerto Rico.

Objetivos De La Transacción

- Establecer un sistema eléctrico moderno, confiable, costo eficiente y resiliente
- Desarrollar un sistema eléctrico que cuente con una mejor preparación ante emergencias y que pueda resistir eventos climáticos extremos, así como posibles eventos provocados por el hombre
- Proveer un servicio eléctrico a un costo asequible, utilizando la experiencia y los recursos del sector privado para maximizar la eficiencia operacional y la estabilidad financiera al correr la utilidad
- Proporcionar a los puertorriqueños un sistema de Transmisión y Distribución (T&D) de energía eléctrica más confiable, con menos interrupciones
- Llevar el número de incidentes y otras medidas de seguridad al nivel de los estándares de la industria
- Implementar las mejores prácticas de la industria y la excelencia operacional a través de la continuidad gerencial y la planificación a largo plazo
- Asegurar cantidades máximas de fondos federales de asistencia por desastre para la reconstrucción de la infraestructura a raíz del paso de los huracanes Irma y María
- Medir la satisfacción del cliente mediante un tercero independiente
- Iniciar una revitalización a largo plazo de la economía de Puerto Rico a través de un servicio de electricidad confiable y resiliente, que se traduzca en mayores inversiones para la Isla y apoyo al desarrollo económico

Detalles Del Proceso De Licitación

El Reporte del Comité de Alianzas está disponible en el portal de la Autoridad para las Alianzas Público-Privadas de Puerto Rico (P3).

- El proceso de licitación fue uno riguroso, minucioso y de análisis metódico
- 5 participantes de clase mundial sometieron solicitud de calificación (RFQ)
- 4 licitadores precalificados participaron en el proceso de solicitud de propuesta (RFP)
- 17,988 documentos relacionados con la AEE se hicieron disponibles para evaluación de los licitadores
- Sobre 700 preguntas formuladas y respondidas
- Sobre 20 llamadas y reuniones presenciales
- Sobre 7 borradores de documentos de transacción distribuidos a los licitadores para su revisión y comentarios
- 8 reuniones presenciales para la discusión de los comentarios de los licitadores a los documentos de la transacción
- Sobre 19 reuniones del Comité de Alianzas para la revisión y discusión de los elementos de la transacción
- 2 empresas líderes en la industria sometieron propuestas

Sobre Luma Energy

LUMA es una empresa que ha sido establecida en Puerto Rico por las compañías Canadian Utilities Limited (CUL), la compañía de energía de ATCO Ltd., Quanta Services, Inc. (Quanta) e Innovative Emergency Management, Inc. (IEM).

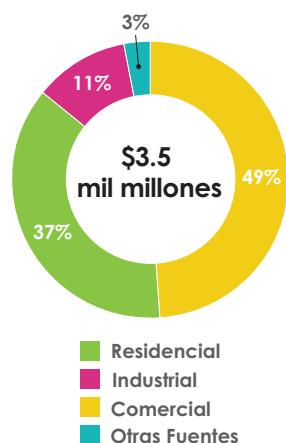
- ATCO es una empresa con décadas de operación gerencial de excelencia en la administración de diversas utilidades de clase mundial que proveen energía segura y confiable a millones de clientes
- Quanta es un proveedor líder en la industria de soluciones de infraestructura que cuenta con experiencia técnica en el desarrollo de infraestructura confiable y en el adiestramiento de la fuerza laboral
- IEM es una empresa experta en el manejo de fondos federales, que cuenta con sobre 34 años de experiencia en apoyar a los sectores público y privado en la optimización de su preparación, mitigación de riesgos, respuesta efectiva ante un desastre y recuperación del mismo

LUMA maximizará su experiencia aportando:

- Una fuerza laboral combinada de más de 50,000 personas
- La flota especializada más grande de Norteamérica
- Una operación de sobre 52,000 millas de líneas de transmisión y distribución que cubren 165,000 millas cuadradas de territorio
- La supervisión de sobre \$51 mil millones en programas de recuperación ante desastres
- Diversos servicios de manejo de emergencias, que actualmente brindan a más de 300 jurisdicciones (estados, locales y territoriales)

AEE en Números

Ingresos Anuales



Número de Clientes



~1.5 millones

- 91% residencial
- 9% comercial
- 1% industrial y otras fuentes

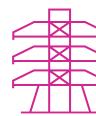
Número de Empleados



~6,000

- 41% empleados T&D
- 19% empleados generación
- 40% otros empleados

Millas de Líneas T&D



- 1,114 millas de líneas de transmisión (230 kV/115 kV)
- 1,376 millas de líneas de subtransmisión (38 kV)
- 16,035 millas de líneas de distribución de voltaje primario (13 kV, 8 kV, 4 kV)
- 399 subestaciones propiedad de AEE y 613 subestaciones de propiedad privada

Transacción T&D en Números

Período Estimado de Transición



~11 meses

Proyección Promedio de Ahorros Operacionales Anuales Durante la Primera Mitad del Período



\$169 millones

- Ahorros de 27% mayores que el promedio de **Cargo por Servicio** anual para el período
- Ahorros netos acumulados de \$323 millones **tras** el pago de Cargo por Servicio

Cuota de Incentivo Atada a Métricas de Rendimiento



- ✓ **Confiabilidad y resistencia mejorada**
- ✓ **Mejor servicio al cliente**
- ✓ Mayor atención a la **seguridad**

Términos Del Contrato De Operación Y Mantenimiento (O&M)

La estructura de un contrato de Operación y Mantenimiento (O&M) es la indicada para lograr los objetivos de maximizar el uso de los fondos federales para la modernización de la red eléctrica y transformar el sector.

El contrato de Operación y Mantenimiento provee que:

- Los activos del sistema de T&D permanecen con la AEE a lo largo de todo el término
- El operador debe (i) cumplir con estándares operacionales específicos y (ii) exceder ciertos indicadores de desempeño en el transcurso del término para obtener su tarifa de incentivo
- La compensación del operador es parte del costo total de la operación del sistema eléctrico en Puerto Rico, que se estima en más de \$3mil millones anuales

LUMA será responsable de todos los aspectos de operación, administración, mantenimiento, reparación, restauración y optimización del sistema de T&D. Esto incluye, entre otros:

- Implementación de un plan para remediar, reparar, sustituir y estabilizar el equipo, sistemas y servicios del sistema de T&D
- Adquisición e implementación de fondos federales
- Recomendación y ejecución de mejoras capitales
- Proveer servicios de facturación y cobro

En virtud de la Ley Núm. 120, ningún empleado regular de la AEE quedará sin empleo ni perderá beneficios como resultado de las transacciones de la AEE. (Sección 15 – Ley Núm. 120)

