NEPR

Received:

Nov 18, 2021

5:39 PM

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

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

CASE NO.: NEPR-MI-2020-0012

**SUBJECT:** Motion Requesting Extension of Time to Finalize Phase III of the Tranche I Renewables RFP

## MOTION REQUESTING LIMITED EXTENSION OF TIME OF SEVEN (7) DAYS TO FINALIZE PHASE III OF THE TRANCHE I RENEWABLES RFP

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

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

1. On November 8, 2021 the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau") issued a Resolution and Order in the captioned case (the "November 8 Order") requesting, among other matters, that the Puerto Rico Electric Power Authority ("PREPA") "complete Phase III and submit to the Energy Bureau for its evaluation and approval the corresponding draft Power Purchase and Operation Agreements" on or before December 1, 2021.

2. PREPA is working diligently to comply with the ordered deadline and finalize Phase III of the Tranche I RFP. Notwithstanding, on November 12, 2021, PREPA received from proponents best and final offers. As part of the process to make an informed and final determination, PREPA needs to evaluate the levelized cost of energy ("LCOE's") and levelized cost of storage ("LCOS's") per technology group with this new information and finalize negotiations of contracts with proponents related to the pricing proposal that will be finally

1

accepted by PREPA. This process implies that PREPA will chose only those proposals that are reasonable, compliant with the Fiscal Plan directives and having the best interest of the consumers in mind.

- 3. Further, PREPA will continue to work in the finalization of Phase III of Tranche I and will seek the Energy Bureau's assistance to ensure the success of Tranche 1, as needed.
- 4. Pursuant to the above, PREPA respectfully requests from the Energy Bureau a limited extension of seven (7) days, from the ordered deadline, or until December 8, 2021, to complete Phase III and submit to the Energy Bureau for its evaluation and approval the corresponding draft Power Purchase and Operation Agreements.

**WHEREFORE**, the Puerto Rico Electric Power Authority respectfully requests that the Energy Bureau to **GRANT** PREPA seven (7) additional days, from the ordered deadline, or until

December 8, 2021, to complete Phase III and submit to the Energy Bureau for its evaluation and approval the corresponding draft Power Purchase and Operation Agreements.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18<sup>th</sup> day of November 2021.

<u>s/ Maralíz Vázquez-Marrero</u>Maralíz Vázquez-Marreromvazquez@diazvaz.lawTSPR 16,187

<u>s/ Katiuska Bolaños-Lugo</u>
Katiuska Bolaños-Lugo
kbolanos@diazvaz.law
TSPR 18,888

## DÍAZ & VÁZQUEZ LAW FIRM, P.S.C.

290 Jesús T. Piñero Ave. Oriental Tower, Suite 803 San Juan, PR 00918 Tel.: (787) 395-7133

Fax. (787) 497-9664

## **CERTIFICATE OF SERVICE**

It is hereby certified that, on this same date, I have filed the above motion with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at https://radicacion.energia.pr.gov/login, and a courtesy copy of the filling was sent to LUMA through its legal representatives at margarita.mercado@us.dlapiper.com and laura.rozas@us.dlapiper.com.

In San Juan, Puerto Rico, this 18th day of November 2021.

<u>s/ Maraliz Vázquez Marrero</u> Maraliz Vázquez Marrero