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

**IN RE:** REVIEW OF THE PUERTO RICO ELECTRIC POWER AUTHORITY'S 10-YEAR INFRASTRUCTURE PLAN – DECEMBER 2020 **CASE NO.:** NEPR-MI-2021-0002

**SUBJECT:** Resolution and Order on PREPA's October 26 Motion and October 27 Motion.

### **RESOLUTION AND ORDER**

### I. Relevant Background

On October 26, 2022, the Puerto Rico Electric Power Authority ("PREPA") filed a document titled *Motion to Submit 404 HMPG Application Package and Request for Leave to Present to COR3 and FEMA* ("October 26 Motion") through which it requests the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") to note the submittal of the Emergency Generating Units HMGP<sup>1</sup> Project Application package and grant PREPA leave to submit it to the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency ("COR3") and the Federal Emergency Management Agency ("FEMA") to request the approval of eleven (11) new Emergency Generation Units.

In the October 26 Motion PREPA states that the deadline for submitting revisions to the HMPG packages to FEMA is October 31, 2022, and therefore, PREPA completed the Emergency Generation Units project application package ("Project Application Package"), equivalent to 428 FAASt<sup>2</sup> project Scope of Works and submits it as Annex A of the October 26 Motion for the consideration of the Energy Bureau.<sup>3</sup>

PREPA avers that its request is made in accordance with the March 26 Resolution<sup>4</sup> and following the directives of Eng. Francisco Berríos Portela, Auxiliary Secretary of Energy Affairs ("Eng. Berríos"), included in a letter sent to Eng. Josué A. Colón Ortiz, Executive Director of PREPA, on October 26, 2022 ("October 26 Letter"), which is attached as Annex B to the October 26 Motion.<sup>5</sup> PREPA states that, through the October 26 Letter, Eng. Berríos directed PREPA to submit to the Energy Bureau the Project Application Package for the peaking units approved by FEMA under the 404 HMGP, and that the scope must be aligned with the peaking units considered in the "Approved IRP" as operational and which represent seven (7) units, for an approximate of 147 MW, which are separate from the *black-start* units to be located in Costa Sur and Yabucoa.<sup>6</sup>

PREPA, however, argues that the total remaining number of units to be acquired is eleven (11), not seven (7).<sup>7</sup> PREPA states that, pursuant to Regulation 9021<sup>8</sup>,Part 4 of its Proposed IRP, pp. 4-1 to 4-30, described the existing resources.<sup>9</sup> Moreover, PREPA states that Section 4.2.1.3 of its Proposed IRP included a list of several distributed gas turbines distributed around Puerto Rico, *i.e.*, "pairs of two units located: Daguao (2x21), Palo Seco (6x21), Aguirre

<sup>4</sup> See, Resolution and Order, In Re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan -December 2020, Case No. NEPR-MI-2021-0002, March 26, 2021 ("March 26 Resolution").

<sup>5</sup> October 26 Motion, p. 2, ¶ 4.

<sup>6</sup> October 26 Motion, p. 2, ¶ 4.

<sup>7</sup> Id. ¶ 5.

<sup>8</sup> Regulation on Integrated Resource Plan for the Puerto Rico Electric Power Authority, May 23, 2018 ("Regulation 9021").

<sup>9</sup> October 26 Motion, p. 2, ¶ 6.

<sup>&</sup>lt;sup>1</sup> Section 404 Hazard Mitigation Grant Program ("HMGP").

<sup>&</sup>lt;sup>2</sup> FEMA Accelerated Award Strategy.

<sup>&</sup>lt;sup>3</sup> October 26 Motion, pp. 1-2, ¶ 3.

(2x21), Costa Sur (2x21), Jobos (2x21), Yabucoa (2x21), and Vega Baja (2x21)."<sup>10</sup> PREPA avers that such Section establishes that those nine (9) pairs of distributed units, while in operating condition, are old and have poor heat rates, and that fourteen (14) of those units are "retired early in the IRP capacity expansion plan and replaced by new peakers."<sup>11</sup> PREPA argues that it did not consider retiring any of the eighteen (18) gas turbines, but to replace them.<sup>12</sup>

PREPA argues that Section 4.2.1.3 of the Proposed IRP also stated that "[t]he two 21 MW GTs at Aguirre and two 21 MW GTs at Costa Sur are necessary to provide black-start capability to their respective combined cycle and steam turbine at each location."<sup>13</sup> Therefore, PREPA indicates the units modeled as available generation resources in the Proposed IRP were eighteen (18), and that the Energy Bureau determined that PREPA's description of the existing resources complied with Section 2.03(D)(1)(b) of Regulation 9021.<sup>14</sup>

PREPA also asserts that, as established in the Resolution and Order issued in the instant case on September 15, 2022, out of the abovementioned eighteen (18) units, the Energy Bureau already approved the replacement of 147 MW of gas turbine capacity with fossil-fuel generators providing peaking support services, and that such peaking capacity includes the *MegaGen* mobile units totaling 66 MW installed at Palo Seco, leaving up to 81 MW of new capacity to procure, which will be pursued by PREPA through the new black-start systems at Costa Sur and Yabucoa.<sup>15</sup> Therefore, PREPA argues that the Proposed IRP modeled eighteen (18) units and, after subtracting the three (3) *MegaGens* and the four (4) black-start units approved by the Energy Bureau, there are still eleven (11) emergency generators to be acquired.<sup>16</sup> Based on the foregoing, PREPA requests the Energy Bureau to grant leave to move forward with the submittal of the Emergency Generating Units HMGP Project Application Package, which includes eleven (11) new Emergency Generating Units.

On October 27, 2022, PREPA filed a document titled *Motion to Clarify Regarding Amendment to 404 HMPG Application Package* ("October 27 Motion") through which it withdraws its request for approving eleven (11) new simple cycle gas turbines, and requests the Energy Bureau to grant PREPA leave to submit an amended 404 HMGP Application Package to acquire four (4) black-start units to be at Costa Sur and Yabucoa and seven (7) simple cycle gas turbines.<sup>17</sup> Such application package that will be amended is attached as Annex A to the October 27 Motion. Through the October 27 Motion PREPA requests the Energy Bureau to grant leave to submit to COR3 and the FEMA the draft letter attached as Annex B thereto, or a form substantially similar.<sup>18</sup> PREPA states that, in such letter, it will inform COR3 and FEMA of the amendment of the simple cycle gas turbines project already approved by FEMA.<sup>19</sup> PREPA argues in the October 26 Letter, which is attached as Annex C to the October 27 Motion.<sup>20</sup>

<sup>10</sup> *Id.*, pp. 2-3.
<sup>11</sup> *Id.*, p. 3.
<sup>12</sup> *Id.*<sup>13</sup> *Id.*, ¶ 7.
<sup>14</sup> *Id.*<sup>15</sup> *Id.*, ¶ 8.
<sup>16</sup> *Id.*<sup>17</sup> October 27 Motion, p. 1, ¶ 2.
<sup>18</sup> *Id.*, ¶ 2.
<sup>19</sup> *Id.*<sup>20</sup> *Id.*, p. 2 ¶ 4.



# II. Analysis

# (a) Approval of PREPA's IRP

PREPA submitted to the Energy Bureau a proposed Integrated Resources Plan ("IRP"), which included a Proposed Action Plan.<sup>21</sup> The Proposed IRP was evaluated by the Energy Bureau pursuant to Regulation 9021 under Case No.: CEPR-AP-2018-0001. After a comprehensive proceeding, the Energy Bureau approved in part and rejected in part the Proposed IRP.<sup>22</sup> Likewise, the Energy Bureau rejected in part the Proposed Action Plan and ordered the adoption and implementation of the Modified Action Plan set forth in the Approved IRP.<sup>23</sup>

# (b) Evaluation of the replacement of eighteen (18) peaking units included in the Proposed IRP

As part of the Proposed IRP, PREPA identified and described eighteen (18) existing Gas Turbine ("GT") peaking units with generation capacity of 21 MW each ("Existing Peakers").<sup>24</sup> The Existing Peakers were identified in pairs based on their locations as follows: Daguao (DG 1-1 and DG-1-2); Palo Seco (PS 1-1 and PS-1-2); Palo Seco (PS 2-1 and PS 2-2); Palo Seco (PS 3-1 and PS 3-2); Aguirre (AG 2-1 and AG 2-2); Costa Sur (CS 1-1 and CS 1-2); Jobos (JB 1-1 and JB 1-2); Yabucoa (YB 1-1 and YB 1-2); and Vega Baja (VB 1-1 and VB 1-2).<sup>25</sup> According to PREPA, four (4) out of the eighteen (18) Existing Peakers, to wit, the Aguirre pair and the Costa Sur pair, are used for black start of the Aguirre and Costa Sur plants respectively (the "Black Starts").<sup>26</sup>

PREPA's description of the conditions of the Existing Peakers during the IRP process is conflicting. On the one hand, PREPA states that although the Existing Peakers **are in operating conditions**, they are fairly old and have very poor heat rates.<sup>27</sup> Nevertheless PREPA states that seven (7) of the Existing Peaking Units, **totaling 147 MW**, **were not available** at the time of filing the Proposed IRP because they require major overhauls.<sup>28</sup> Still, PREPA recognized that fourteen (14) of the eighteen (18) Existing Peakers are retired early in the IRP capacity expansion plan and replaced by new peakers.<sup>29</sup> Specifically, PREPA proposed the retirement of the Existing Peakers by 2019-2021.<sup>30</sup> It is important to note that the Modified Action Plan did not contemplate the replacement of the Existing Peakers once they were retired.

The Proposed IRP was centered, in part, on the concept of MiniGrids, defined by PREPA as zones of resiliency into which the Electrical System could be segregated during and after a

<sup>22</sup> Final Resolution and Order on the Puerto Rico Electric Power Authority's Integrated Resource Plan, In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan, Case No. CEPR-AP-2018-0001, August 24, 2020 ("Approved IRP"). Minor modifications and/or clarifications to the Approved IRP were introduced through a Resolution and Order on Reconsiderations issued by the Energy Bureau on December 2, 2020, in case: In re. Review of the Puerto Rico Electric Power Authority Integrated Resource Plan, Case No. CEPR-AP-2018-0001. **The Approved IRP is final and firm**.

<sup>23</sup> Id.

<sup>24</sup> See, in general, Proposed IRP: Exhibit 4-1, p. 4-1; Exhibit 4-5, p. 4-3; Section 4.2.3.1, p. 4-7; and PREPA's Response to the Energy Bureau's ROI 9-2, as well as the Attachment 1 of such response.

<sup>25</sup> Id.

<sup>26</sup> Id.

<sup>27</sup> Proposed IRP, Section 4.2.3.1, p. 4-7.

<sup>28</sup> PREPA's Response to the Energy Bureau's ROI 9-2, as well as the Attachment 1 of such response

<sup>29</sup> Proposed IRP: Section 4.2.3.1, p. 4-7; Exhibit 8-45, p. 8-52; Exhibit 10-3, p. 9-6; and Exhibit 10-5, p. 9-9.

<sup>30</sup> Proposed IRP: Exhibit 8-45, p. 8-52; Exhibit 10-3, p. 9-6; and Exhibit 10-5, p. 9-9.

<sup>&</sup>lt;sup>21</sup> PREPA's Motion to Leave File IRP Main Report "ERRATA" Version, dated June 14, 2019, which included a corrected version of the Main IRP Report submitted on June 7,2019, and is titled Integrated Resource Plan 2018-2019, Draft for the Review of the Puerto Rico Energy Bureau, Prepared for the Puerto Rico Electric Power Authority, June 7, 2019 (Rev. 2.1) ("Proposed IRP").

major weather event to ensure that the load could be served using local resources.<sup>31</sup> According to PREPA, the need to serve critical and priority loads within the MiniGrids resulted in the necessity to add 18 GT new peakers (23 MW each) at selected locations across the island, with preference for those locations where the Existing Peaking Units are located.<sup>32</sup> PREPA argued, that adding the new 18 GT peakers will allow the retirement of the the Existing Peakers, which were described as old and unreliable.<sup>33</sup> PREPA proposed to place in service the eighteen (18) new GT peakers as soon as practical.<sup>34</sup> PREPA also argued that the new peakers would be necessary to provide reliable distributed generation to serve critical and priority loads within the MiniGrids.

After a thorough and comprehensive evaluation the Energy Bureau determined there was no support for PREPA'S capacity planning assumption that each of the eight (8) MiniGrids must independently maintain the proposed level of local thermal capacity reserve -that would be provided in part by eighteen (18) new GT peakers- with no opportunity or consideration for power transfers between MiniGrids to contribute to meeting a portion of actual critical load.<sup>35</sup> The Energy Bureau also determined that PREPA did not justify that all critical load of the proposed MiniGrids must be served exclusively with thermal resources.<sup>36</sup>

Consistent with the foregoing, the Energy Bureau determined that PREPA did not justify the addition of the eighteen (18) new GT peakers **based exclusively in the use fossil-fuel** as part of the least cost plan.<sup>37</sup> The Energy Bureau emphasized this generation capacity was not open to all generation technologies and was selected mainly to support the development of the proposed MiniGrids, which, as designed, increases the reserve requirement for thermal resources.<sup>38</sup>

Still, the Energy Bureau allowed replacement of a portion of the Existing Peakers with new peaking resources. The Energy Bureau allowed PREPA to replace no more than 147 MW of the Existing Peakers with new fossil-fuel generation. It further clarified that, **unless otherwise approved by the Energy Bureau**, the 147 MW are inclusive of the 66 MW MegaGen mobile units totaling 66 MW installed at Palo Seco, leaving PREPA with only 81 MW of new fossil fuel generation capacity to procure.<sup>39</sup>

## (c) Conditional Approval of Seven Additional Peakers

To date, the Energy Bureau has approved the 147 MW peaking generation capacity authorized in the Approved IRP.<sup>40</sup> Such generation capacity comprises, (i) three (3) MegaGen units installed at Palo Seco and (ii) four black start units to be installed at Costa Sur and Yabucoa (the "New Black Starts").<sup>41</sup> Now, PREPA asks the Energy Bureau, through the October 27 Motion, to authorize the acquisition of seven (7) additional GTs, to replace seven

- <sup>35</sup> Approved IRP, ¶ 727, p. 224.
- <sup>36</sup> Approved IRP, ¶¶ 725-726, p. 224.
- <sup>37</sup> Approved IRP, ¶. 885, pp. 275-276.

<sup>38</sup> Id.

<sup>39</sup> Id.

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<sup>40</sup> See, in general, Resolution and Order, In Re: Review of the Puerto Rico Electric Power Authority's 10-Year Infrastructure Plan-December 2020, Case No.: NEPR-MI-2021-0002, August 18, 2022.

<sup>&</sup>lt;sup>31</sup> Prosed IRP, p. 1-2.

<sup>&</sup>lt;sup>32</sup> Prosed IRP, p. 1-10; p. 9-6; and p. 9-7.

<sup>&</sup>lt;sup>33</sup> See Id. and PREPA's Response to the Energy Bureau's ROI 9-2.

<sup>&</sup>lt;sup>34</sup> Id.

(7) of the Existing Peakers (the "Seven Additional Peakers"). PREPA states that the cost of the Seven Additional Peakers will be reimbursed by FEMA.<sup>42</sup>

In support of its petition, PREPA states that in the Proposed IRP it modeled the Existing Peakers and that their retirement and replacement with new units was contemplated as part of the proposed Action Plan. Notably, in the October 26 Motion PREPA argued that of eighteen (18) Existing Peakers, after subtracting the three (3) MegaGens and the four (4) Black Starts units approved by the Energy Bureau, there are still eleven (11) emergency generators to be acquired as per the Approved IRP. In the October 27 Motion PREPA "clarified" its position to conclude that there are still seven (7) instead of eleven (11) emergency generators to be acquired as per the Approved IRP.

In both cases PREPA misconstrues the Proposed IRP and the Approved IRP. As discussed in Part II(b), the Energy Bureau, (i) rejected PREPA's proposed addition of the eighteen (18) new GT peakers and (ii) allowed only the replacement of a portion of the Existing Peakers, to wit, a portion not exceeding 147 MW of fossil fueled generation capacity. PREPA recognized in the Proposed IRP that, (i) at least seven (7) of the eighteen (18) Existing Peakers were not operational and (ii) that the capacity expansion model used in the Proposed IRP retires the Existing Peakers between 2019 and 2021. Therefore, PREPA's reasoning for the acquisition of the Seven Additional Peakers discussed in the October 26 Motion and the October 27 Motion is rejected.

Notwithstanding the foregoing, after a careful evaluation of the prevailing circumstances of the Electric System and, in accordance with the Approved IRP, the Energy Bureau **CONDITIONALLY APPROVES** the Seven Additional Peakers.

<u>First</u>, the Energy Bureau is mindful of the fragile condition of PREPA's generation resources after, and because of hurricane Fiona. As part of its duties to oversee the Electrical System in Puerto Rico, the Energy Bureau has received continuous briefings from LUMA and PREPA regarding the conditions of the generation, transmission, and distribution systems after the passage of hurricane Fiona.<sup>43</sup> The reliability and consistency of the generation resources - including both, private and PREPA owned- have been affected to a level that requires to expedite certain actions contemplated in the Approved IRP. Those related to the availability of generation resources in the midterm to serve critical loads for ensuring a more resilient electric system.

<u>Second</u>, the Approved IRP limited the acquisition of new fossil fueled generation to 147 MW of capacity. Therefore, PREPA may procure additional fossil resources, subject to the prior approval of the Energy Bureau.<sup>44</sup>

<u>Third</u>, as discussed in more detail in Part II(b), the Approved IRP rejected the notion that the eight (8) proposed MiniGrids, (i) must be served **only** with thermal resources, and (ii) that they shall independently maintain the proposed level of local thermal capacity reserve with no opportunity or consideration for power transfers between MiniGrids.<sup>45</sup> Notably, the Energy Bureau recognized that the MiniGrid planning approach was ripe for optimization, although PREPA did not attempt to do so as part of the Proposed IRP.<sup>46</sup> Through the Approved IRP, the Energy Bureau informed the commencement of a MiniGrid Optimization proceeding to further explore the costs, benefits, and alternative configurations of combinations of wires (*i.e.*, hardened T&D assets) and local distributed resources that best



 $<sup>^{\</sup>rm 42}$  October 26 Motion, p.1 and October 27 Motion, p.1.

<sup>&</sup>lt;sup>43</sup> As further discussed below, several processes are undergoing before the Energy Bureau concerning Hurricane Fiona.

<sup>&</sup>lt;sup>44</sup> Approved IRP, ¶ 885, pp. 275-276.

<sup>&</sup>lt;sup>45</sup> Approved IRP, ¶¶ 725-726, p. 224.

<sup>&</sup>lt;sup>46</sup> Approved IRP, ¶719, p. 222.

safeguard the Electrical System against the effects of short-term and extended electric system outages that can occur as a result of severe weather events.<sup>47</sup>

Fourth, consistent with the Approved IRP, through Resolution and Order issued on December 22, 2020, on Case No. NEPR-MI-2020-0016 ("December 22 Resolution"), the Energy Bureau commenced the MiniGrid Optimization Proceeding ("Optimization Proceeding"). The Energy Bureau established in the December 22 Resolution that the purpose of the Optimization Proceeding would be to begin a sequential process of comparing two (2) approaches to reach increased electric power system resiliency: (i) one based on transmission system hardening, coupled with distribution system reinforcements, to reliably deliver broadly localized power to loads even after extreme weather events have severed the transmission system links between regions; and (ii) another based on providing many points (potentially, thousands) of site-specific or microgrid-provided distributed generation and storage to serve critical load and potentially other loads, also after an extreme weather event has severed the transmission system. In the Approved IRP the Energy Bureau did not reject altogether the use of fossil-fuel generation units -such as mobile GT peakers- to support PREPA's proposed MiniGrid planning strategy. The partial rejection of such strategy was based -in part- on the lack of evaluation and optimization by PREPA.

The Energy Bureau considers that to be consistent with the Approved IRP, approving the Seven Additional Peakers in support of the MiniGrid concept shall be subject to the following conditions, (i) the generation of energy **shall not be based exclusively** in the use fossilfuels, and (ii) the availability of the Seven Additional Peakers shall be evaluated in accordance with the requirements of the Optimization Proceeding (as such requirements may be modified to accommodate the availability of the Seven Additional Peakers as sources of generation).

<u>Lastly</u>, it should be noted that, according to PREPA, the estimated time to place in service the Seven Additional Peakers is 4.5 years.<sup>48</sup> Hence, this project will not impact the current generation deficiencies caused by Hurricane Fiona, as presented before the Energy Bureau in the procedure *In re: LUMA's Response to Hurricane Fiona*, case number: NEPR-MI-2022-0003.

Nevertheless, as stated before, the Energy Bureau notes that PREPA's current generation deficiencies, presented by LUMA, are under consideration in the before mentioned proceeding Case No.: NEPR-MI-2022-0003, *In Re: LUMA's Response to Hurricane F*. The Energy Bureau initiated the referenced proceeding given the urgency of identifying mechanisms that can be expeditiously deployed to mitigate in the short term the impact of Hurricane Fiona on PREPA's generation availability. As part of the proceeding, the Energy Bureau ordered LUMA, in coordination with FEMA and PREPA, to develop a Generation Stabilization Plan as a direct response to the effects of Hurricane Fiona, to address baseload generation inadequacies and shortfalls that affect dispatch availability.

The Energy Bureau **CLARIFIES** that short-term risk mitigation strategies to address generation deficiencies are being evaluated in Case No.: NEPR-MI-2022-0003.

## III. Conclusion

Considering the foregoing, the Energy Bureau **ORDERS** PREPA to work with COR3 on the revision of the Project Application Package for the Seven Additional Peakers, subject to the following conditions:

- a. The Seven Additional Peakers SHALL be:
  - (i) capable of being operated using two types of fossil-fuel and Hydrogen or a mix thereof. To avoid doubts, the Project Application Package must contemplate the necessary infrastructure (as a conceptual

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<sup>&</sup>lt;sup>47</sup> Approved IRP, ¶117, p. 19.

<sup>&</sup>lt;sup>48</sup> See Annex A, p. 39 of the October 26 and October 27 Motions.

design) to manufacture and supply Green Hydrogen<sup>49</sup> (produced with excess renewable energy from the grid);

- (ii) mobile; and
- (iii) capable of being used as synchronous condensers to further facilitate the integration of renewables into the grid.

Furthermore, PREPA **SHALL** modify the Project Application Package for the Seven Additional Peakers to ensure that it includes and fully contemplates the equipment and/or technology necessary to operate in full compliance with applicable laws and regulations.

PREPA **SHALL** file the revised Project Application Package to the Energy Bureau as soon as possible.

The Energy Bureau **DETERMINED** that the MiniGrid Optimization process will consider the use of the Seven Additional Peakers at the proposed locations or at preferred alternative locations determined based on the Optimization Process **since their main purpose is to be used in emergency situations**.<sup>50</sup>

Finally, as stated in Part II(c) of this Resolution and Order, as part of the Optimization Proceeding, PREPA **SHALL** evaluate the use of the Seven Additional Peakers to optimize the development of the Minigrids strategy contemplated in the Proposed IRP. To avoid doubts, approving the Seven Additional Peakers shall not be construed and/or interpreted in any way as an acceptance at large of the rejected eight (8) Minigrids proposal advanced by PREPA as part of the Proposed IRP, including the replacement of all the fossil-fuel GT peakers considered in the Proposed IRP.

Be it notified and published

dison Aviles Deliz Chairman

Ferdinand A. Ramos Soegaard Associate Commissioner

Lillian Mateo Santos Associate Commissioner

Sylvia B. Ugarte Araujo Associate Commissioner



<sup>&</sup>lt;sup>49</sup> "Green Hydrogen" is defined as hydrogen produced by hydrolysis using electricity produced from renewable sources.

<sup>&</sup>lt;sup>50</sup> In a separate resolution to be issued in the Optimization Proceeding, the Energy Bureau will provide additional context and details regarding the expected optimization process concerning the Seven Additional Peakers.

#### **CERTIFICATION**

I hereby certify that the majority of the members of the Puerto Rico Energy Bureau has so agreed on November 3, 2022. I also certify that on November 4, 2022, a copy of this Resolution Order and was notified by electronic mail to ana.rodriguezrivera@us.dlapiper.com, laura.rozas@us.dlapiper.com; jmarrero@diazvaz.law, kbolanos@diazvaz.law, hrivera@jrsp.pr.gov. I also certify that today, November 4/, 2022, I have proceeded with the filing of the Resolution and Order issued by the Puerto Rico Energy Bureau.

For the record, I sign this in San Juan, Puerto Rico, today November  $\not \perp$  2022.

Sonia Seda Gaztambide Clerk

