

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

NEPR

Received:

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

CASE NO.: NEPR-MI-2020-0012

MOTION IN COMPLIANCE WITH THE JUNE 27TH ORDER

TO THE HONORABLE ENERGY BUREAU,

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") through its undersigned legal representation and, very respectfully, informs and requests as follows:

1. On April 16, 2024, PREPA filed a *Motion to Submit Amendments for Two Executed ESSAs* ("April 16 Motion") to the Energy Bureau of the Puerto Rico Public Service Regulatory Board (the "Energy Bureau") for the review and approval of amendments to the two Energy Storage Service Agreements ("ESSAs") between PREPA and Clean Flexible Energy.

2. On May 31, 2024, PREPA presented another document titled *Motion to Submit Amendments for the Review and Approval of Clean Flexible Energy, LLC's PPOAs and ESSAs by the Energy Bureau* ("May 31 Motion") to comply with the financing requirements of the Department of Energy's Loan Program Office ("LPO"). In the May 31 Motion, PREPA submitted additional amendments to the ESSAs.

3. To complete their evaluation, through a *Resolution and Order* issued and notified on June 27th, 2024 ("June 27 Order"), the Energy Bureau ordered PREPA to submit a response to a *Request for Information* attached to the aforementioned order by July 8th, 2024.

4. On July 8th, 2024, PREPA filed *Motion in Partial Compliance with the June 27th Order and a Request for an Extension of Time to Comply*. PREPA submitted its responses to the June 27th Order and requested additional time to provide answers to specific questions in the Request for Information.

5. In light of the aforementioned, PREPA hereby submits its responses to 3(e), 3(f), 9, and 11 of the Request for Information. PREPA is resubmitting Exhibit A from the July 8th Motion, which includes the previously mentioned answers.

6. Likewise, PREPA reiterates its request for confidential treatment from the July 8th Motion to Exhibit A.

WHEREFORE, PREPA respectfully requests the Energy Bureau to: (1) take **NOTICE** of the present Motion; (2) **ACCEPT** answers to questions 3(e), 3(f), 9, and 11 of the *Request for Information*; (3) **GRANT** PREPA's petition for confidentiality; and (4) **DEEMS** PREPA in full compliance with the June 27 Order.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of July 2024.

CERTIFICATE OF SERVICE: We hereby certify that this document was filed with the Office of the Clerk of the Energy Bureau using its Electronic Filing System at <https://radicacion.energia.pr.gov/login>, and courtesy copies were sent via e-

mail to LUMA Energy, LLC through its counsels of record at margarita.mercado@us.dlapiper.com,
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