

COMMONWEALTH OF PUERTO RICO
ENERGY COMMISSION



IN RE: INTEGRATED RESOURCE PLAN FOR THE PUERTO RICO ELECTRIC POWER AUTHORITY	ORDER NO. CEPR-AP-2015-0002 SUBJECT: Integrated Resource Plan for the Puerto Rico Power Authority
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JOINT INFORMATIVE MOTION

To the Honorable Puerto Rico Energy Commission.

The parties listed below want to call the attention of this Honorable Commission to the fact that information provided by the Puerto Rico Electric Power Authority (PREPA) as part of the discovery process of the Integrated Resources Plan (IRP) proceedings, is vague, insufficient and inaccurate, specifically in regards to the following topics of:

- Forecasted energy demand, specifically the lack of a tariff rate assumption.
- EPA MATS compliance, including the impact of the RICE-NESHAP rule and other relevant guidelines and indicators.
- Fuel cost hedging plans
- Specifics in regards to Renewable Energy Penetration, including relation with current tariffs (price of power); and measurements requires to comply with current laws in regards to the Renewable Portfolio Standard (RPS).
- Distributed Generation forecast.
- Transmission and distributions plans as a factor of demand forecast.
- Central Generation Build-out plan as a factor of energy demand forecast.

Unless and until PREPA provides full, well-documented, and credible responses to the Commission's December 4th Order and to the intervenors interrogatories, it would be difficult to accept at this time that a reasonable IRP could result as part of this process, neither a meaningful participation as intervenors, is possible.

I HEREBY CERTIFY that the foregoing was sent via certified mail, return receipt requested to and via email to: Nelida Ayala Jimenez, Esq. General Counsel, Puerto Rico Electric Power Authority, PO Box 36928, San Juan, Puerto Rico 00936-3928; n_ayala@aepr.com, Copy was sent via regular mail to the following parties:

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on March 15, 2016.



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