

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

NEPR

Received:

May 26, 2020

11:37 AM

IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY INTEGRATED
RESOURCE PLAN

CASE NO. CEPR-AP-2018-0001

SUBJECT: RESPONSE TO
PREPA'S REVISED REQUEST FOR
LEAVE TO EXECUTE
SEVENTEENTH CONTRACT
RELEASE

**LOCAL ENVIRONMENTAL ORGANIZATIONS' RESPONSE TO PREPA'S
REVISED REQUEST FOR LEAVE TO EXECUTE SEVENTEENTH CONTRACT
RELEASE**

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW, Local Environmental Organizations¹, to respond to PREPA's
May 26th Revised Request for Leave to Execute Seventeenth Contract Release.

Under the proposed Contract Release, Siemens will prepare an updated load
forecast.² Siemens will also obtain updates of gas, coal, and oil price forecasts.

Finally, Siemens will obtain updates of the forecasted penetration of distributed
solar systems on the island.

¹ Comité Diálogo Ambiental, Inc., El Puente de Williamsburg, Inc. -Enlace Latino de Acción Climática, Comité Yabucoño Pro-Calidad de Vida, Inc., Alianza Comunitaria Ambientalista del Sureste, Inc., Sierra Club and its Puerto Rico chapter, Mayagüezanos por la Salud y el Ambiente, Inc., Coalición de Organizaciones Anti-Incineración, Inc., Amigos del Río Guaynabo, Inc., Campamento Contra las Cenizas en Peñuelas, Inc., and CAMBIO Puerto Rico, Inc., ("Local Environmental Organizations")

² PREPA's motion does not state whether Siemens' updated load forecast will account for decreased load due to the COVID-19 crisis. A recent study predicted a 7.5% drop through the end of 2020, and PREPA Executive Director José Ortiz recently predicted a 9-10% drop through the end of 2020. <https://www.itron.com/solutions/what-we-enable/analytics/forecasting/covid>; <https://app.gotowebinar.com/unified/index.html#/webinar/1512009214340290315/attend/321413018015198772>; Declaration of Chelsea Hotaling in Support of Petitioners' Supplemental May 20th Filing, NEPR-AP-2020-0001, para. 6. <https://energia.pr.gov/wp-content/uploads/2020/05/2020-05-20-AP20200001A42-Petitioners-Second-Suppl.-filing.pdf> PDF pp.19-20.

If the Energy Bureau approves this Contract Release, then Local Environmental Organizations respectfully request that PREPA be required to publish all updated forecasts: especially the load forecast, the fuel price forecast, and the distributed solar penetration forecast. If ratepayers are paying \$32,337 for these forecasts, then ratepayers deserve access to them. Confidentiality is not a concern: Siemens' previous load forecast, fuel price forecasts, and distributed solar penetration forecasts are publicly available at IRP Section 3-1, Section 7.2, and Exhibit 3-18, respectively.

Respectfully submitted,

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CERTIFICATE OF SERVICE

We hereby certify that, on May 26, 2020 we have filed this Response via the Energy Bureau's online filing system, and sent to the Puerto Rico Energy Bureau Clerk and legal counsel to: secretaria@energia.pr.gov; astrid.rodriguez@prepa.com; jorge.ruiz@prepa.com; n-vazquez@aeopr.com; c-aquino@prepa.com and to the following persons:

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Respectfully submitted on this day May 26, 2020

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