

COMMONWEALTH OF PUERTO RICO
PUERTO RICO ENERGY COMMISSION

IN RE: REVIEW OF RATES OF
THE PUERTO RICO ELECTRIC
POWER AUTHORITY

NO. CEPR-AP-2015-0001

SUBJECT: 3rd AND FINAL SET OF
RESPONSES TO THE STAFF OF
THE COMMISSION'S 3rd ROI

**PREPA'S 3rd AND FINAL SET OF RESPONSES TO THE
THIRD REQUIREMENTS OF INFORMATION OF THE
STAFF OF THE PUERTO RICO ENERGY COMMISSION**

TO: THE PUERTO RICO ENERGY COMMISSION
Through the General Legal Counsel at the following email addresses
Gustavo Bonet Martínez, Esq. (gbonet@energia.pr.gov),
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legal@energia.pr.gov

COMES NOW the Puerto Rico Electric Power Authority ("PREPA") and submits the following 3rd and Final Set of Responses to the Third Requirements of Information of the Staff of the Puerto Rico Energy Commission (the "Commission"), dated July 7 2016 (the "3rd ROI"). This submission includes responses to Questions CEPR-SH-001-001 and CEPR-SH-001-003 (Sections II.B.1, II.B.3, and II.C.2 in the outline) in the 3rd ROI, which are being submitted today pursuant to an extension of time granted by the Staff of the Commission on July 15, 2016. This submission also contains revisions to Question CEPR-SH-001-006 (Section II.B.6 in the outline).

PREPA makes a general, standing objection to any request for information or documents to the extent, if any, that it calls for any document or information that is not subject to disclosure or discovery because it is privileged, attorney work product, or subject to any other exemption from disclosure or discovery. Additionally, by responding to these Questions, PREPA does not concede that all of the inquiries are germane to the statutory jurisdiction of the Commission or

the findings the Commission is required or authorized to make under the Puerto Rico Electric Power Authority ("PREPA") Revitalization Act, Act 4-2016 (the "Revitalization Act"), the Puerto Rico Energy Transformation and RELIEF Act, Act 57-2014 (the "RELIEF Act"), as amended by Article 18 of the Revitalization Act, or the Commission's Regulation No. 8720, New Regulation on Rate Filing Requirements for the Puerto Rico Electric Power Authority's First Rate Case ("Regulation 8720"). PREPA does not waive any legal arguments or waive or limit the right to raise other and further legal theories, arguments, and authorities, in briefs or otherwise, including in response to arguments, evidentiary submissions, pleadings, and briefs of other parties and in response to the continued evolution of the record.

For ease of reference, the Questions in the 3rd ROI are quoted, in bold, before each response.

B. Questions for Witness Quintana

1. **CEPR-SH-001-001: Direct Testimony at 8-9 - You state that PREPA's "operational and support areas" are: Generation, Transmission and Distribution, Customer Service; Finance; Environmental Protection and Planning; Human Resources and Labor Affairs; Legal Affairs; and Infrastructure and Operations Administration.**

- a. **What is distinct mission for each of these areas?**

The following response was provided by Javier Quintana, the Executive Director of PREPA.

While PREPA does not have official mission statements for each of the operational areas, the responses to (b) and (c) below contain the job descriptions of the director positions and their direct reports. These descriptions provide granular detail regarding the duties and responsibilities of each operational area.

- b. **For the top manager within each of these areas: (a) state the position title, (b) identify the person who holds the position, (c) provide the mission statement for that position, and (d) describe the procedures currently in place for performance reviews, including but not limited**

to: (i) criteria by which the manager is reviewed, (ii) frequency of review, (iii) who conducts the review, and (iv) consequences for the manager if the review is not satisfactory.

The following response was provided by Javier Quintana, the Executive Director of PREPA.

1) Generation

- (a) Director
- (b) Eng. Martín Pérez García
- (c) The Generation Director is responsible for the power generation and the stable, reliable and efficient operation of Puerto Rico's electrical system. Main responsibilities include the operation and maintenance of thermal power plants, hydroelectric generating units, combustion turbines, transmission and sub-transmission powerlines and switchyards. Also, recommends the adoption of new power generation and transmission techniques and the establishment of technical operation and maintenance standards.
- (d) PREPA currently does not conduct performance reviews for this position.

2) Transmission and Distribution

- (a) Director
- (b) Eng. Faustino González Quiles
- (c) The Transmission and Distribution Director is responsible for the formulation of policies and procedures related to the construction, operation and maintenance of Puerto Rico's Transmission and Distribution grid, as well as implement and review procedures and regulations related to the safe and reliable operation of the electrical grid.
- (d) PREPA currently does not conduct performance reviews for this position.

3) Customer Service

- (a) Director
- (b) Carmen Flores Torres
- (c) The Customer Service Director is responsible for the development and implementation of policies and procedures related to the agency's customer services. Also is responsible for the resolution of disputes or controversies related to billing or client services, or their referral to external examiners or internal administrative judges, according to the applicable procedures. Counsels the Executive Director and the Governing Board.

(d) PREPA currently does not conduct performance reviews for this position.

4) Finance

(a) Director

(b) Ernesto Ramos Morales

(c) The Finance Director is responsible for directing, planning and advising the Executive Director on financial matters, including: accounting, budgeting, fund investments, disbursements, payroll, economic and financial analysis, financial policy, activities related to risks and loss control of the Authority and irrigation systems. It represents the Authority in transactions with trustees, fiscal agents and others bonds representatives and other financial activities.

(d) PREPA currently does not conduct performance reviews for this position.

5) Planning and Environmental Protection

(a) Director

(b) Eng. Sonia Miranda Vega

(c) The Planning and Environmental Protection Director is the principal advisor to the Executive Director regarding the short and long term planning development and expansion of generation sources, transmission and distribution. Also, is responsible for developing and managing PREPA's Capital Improvement Program. Other responsibilities include formulating rate case studies and cost analysis, research and study of new energy sources, development of new planning techniques, perform quality and reliability studies, and develop and implement the agency's environmental policy to comply with the federal and state rules and regulations.

(d) PREPA currently does not conduct performance reviews for this position.

6) Human Resources and Labor Affairs

(a) Director

(b) Belkin B. Nieves González

(c) The Human Resources Director is responsible for the personnel administration and health, as well as the development, implementation and administration of personnel management related plans. Also responsible for the recruitment of new personnel, recordkeeping of all personnel transactions and other central personnel services, the implementation of the agency's health program, and the management of the agency's technical and administrative training programs and

motivational activities programs. Represent the Authority in labor related cases and controversies.

(d) PREPA currently does not conduct performance reviews for this position.

7) Legal Affairs

(a) Director

(b) Nérida Ayala Jiménez, Esq.

(c) The Legal Affairs Director is responsible for providing legal advice or counsel to the Governing Board, the Executive Director and other agency's officers in legal matters. It serves as the agency's legal representative in the courts and other agencies to protect the best interests of PREPA, and offers legal services, according to the needs and obligations of the company. It is also responsible for activities related contracts and compliance of these with the Ethics in Government Act of Puerto Rico of 2012.

(d) PREPA currently does not conduct performance reviews for this position.

8) Infrastructure and Operations Administration

(a) Administrator

(b) Eng. Roberto Betancourt Morales

(c) The Operations and Infrastructure Administrator is responsible for the general supervision over the following areas: Supplies Division, General Services Division, Ground Transportation Division, Corporate Studies and Procedures Department, Bids Evaluation Committee - B; Fuels Office, Architecture and Urban Planning Office, Buildings and Grounds Section, Emergency and Disaster Management Office, Contracts Management Office, Security Operations and Technical Services Office.

(d) PREPA currently does not conduct performance reviews for this position.

c. **For the sub-managers who report directly to the person identified in response to the preceding sub-question, provide the same information described in the preceding sub-question**

1) Generation

Electrical Maintenance and Electrical System Protection Division

- (a) Division Head
- (b) Eng. Víctor Morales Aquino
- (c) This Electrical Maintenance and Electrical System Protection Division Head is responsible for the preventive maintenance, testing, protection and control of the electrical equipment related to the generation, transmission and distribution systems.
- (d) PREPA currently does not conduct performance reviews for this position.

Irrigation, Dams and Reservoirs Division

- (a) Division Head
- (b) Vacant
- (c) This Irrigation, Dams and Reservoirs Division Head manages the Irrigation Districts, in accordance with the applicable governing laws, the operation and maintenance of the supply reservoirs and canal systems by which the waters to land for irrigation are served, operation and maintenance system drain in the Lajas Valley, the sale of water for irrigation, supply and small population scale for industrial use.
- (d) PREPA currently does not conduct performance reviews for this position.

Electrical System Operation Division

- (a) Division Head
- (b) Eng. Edwin Adorno González
- (c) The Electrical System Operation Division Head is responsible for the reliable, safe and economical operation of the transmission, protection and telecommunication systems, as well as the optimal control of the generation system.
- (d) PREPA currently does not conduct performance reviews for this position.

Engineering and Technical Services Division

- (a) Division Head
- (b) Eng. Julio Collazo



- (c) The Engineering and Technical Services Division Head is responsible for providing technical support to other generation directorates areas in development, implementation and management of contracts, as well as environmental engineering and equipment useful life support.
- (d) PREPA currently does not conduct performance reviews for this position.

Costa Sur Power Plant Division

- (a) Division Head
- (b) Eng. Raúl R. Carrera Montalvo
- (c) The Costa Sur Power Plant Division Head is responsible for the safe, reliable and efficient operation and maintenance of the generating units located in the Costa Sur power station, including controlling the power generation costs.
- (d) PREPA currently does not conduct performance reviews for this position.

Palo Seco Power Plant Division

- (a) Division Head
- (b) Eng. Norberto Jiménez Zayas
- (c) The Palo Seco Power Plant Division Head is responsible for the safe, reliable and efficient operation and maintenance of the generating units located in the Palo Seco power station, including controlling the power generation costs.
- (d) PREPA currently does not conduct performance reviews for this position.

San Juan Power Plant Division

- (a) Division Head
- (b) Eng. Antonio Kalil
- (c) The San Juan Power Plant Division Head is responsible for the safe, reliable and efficient operation and maintenance of the generating units located in the San Juan power station, including controlling the power generation costs.
- (d) PREPA currently does not conduct performance reviews for this position.

Aguirre Power Plant Division

- (a) Division Head
- (b) Eng. Milton Ballester Colón

- (c) The Aguirre Power Plant Division Head is responsible for the safe, reliable and efficient operation and maintenance of the generating units located in the Aguirre power complex, including controlling the power generation costs.
- (d) PREPA currently does not conduct performance reviews for this position.

Hidro-Gas and Cambalache Power Plant Division

- (a) Division Head
- (b) Eng. Wilfrido Rodríguez Quijano
- (c) The Hidro-Gas and Cambalache Power Plant Division Head is responsible for the safe, reliable and efficient operation and maintenance of the combustion turbines and hydroelectric generating units located across the Island, including controlling the power generation costs.
- (d) PREPA currently does not conduct performance reviews for this position.

2) Transmission and Distribution

Distribution System Control and Operations Division

- (a) Division Head
- (b) Eng. José Llinas Betancourt
- (c) This Distribution System Control and Operations Division Head is responsible for the reliable, efficient and safe operation of the distribution system. The Division controls and monitors the operations to coordinate preventive inspections and maintenance of the powerline and switchyards to collaborate with the Technical Districts in correcting deficiencies.
- (d) PREPA currently does not conduct performance reviews for this position.

Electrical Distribution Division

- (a) Division Head
- (b) Eng. Carlos J. Laureano Rivera
- (c) The Electrical Distribution Division Head is responsible for the technical activities and the design, construction and expansion of substations lines, as well as the material and equipment selection.
- (d) PREPA currently does not conduct performance reviews for this position.

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Technical Operations Administrator

- (a) Division Head
- (b) Eng. César A. González González
- (c) The Technical Operations Division Head is responsible for the overall management of the different Technical Districts and the direct supervision of each Regional Administrator, which are responsible to plan, organize and control the transmission and distribution system in the respective areas.
- (d) PREPA currently does not conduct performance reviews for this position.

Transmission Lines and Substation Construction Division

- (a) Division Head
- (b) Eng. José A. Batista Miranda
- (c) The Transmission Lines and Substation Construction Division Head is responsible for the project development and implementation of the Capital Improvements Program in the Transmission System.
- (d) PREPA currently does not conduct performance reviews for this position.

3) Customer Service

Customer Service Division

- (a) Division Head
- (b) Dwight Rodríguez Delgado
- (c) The Customer Service Division Head is responsible for managing the customer services activities related to the operation and maintenance of the billing system, the Customer Service Calling Center and the electronic billing transaction system.
- (d) PREPA currently does not conduct performance reviews for this position.

Metering and Wholesales Division

- (a) Division Head
- (b) Víctor De Castro Carlo
- (c) The Metering and Wholesales Division Head is responsible for managing the wholesales customer services activities related to the operation and maintenance of the billing and metering system.
- (d) PREPA currently does not conduct performance reviews for this position.



Commercial Operations Administrator

- (a) Administrator
- (b) Vacant
- (c) The Commercial Operations Administrator is responsible for the overall management of the different Commercial Districts and the direct supervision of each Regional Administrator, which are responsible for the meter reading services, bill collection, complaint investigations, facilities service and ensure the proper use of electricity services and other miscellaneous services to customers.
- (d) PREPA currently does not conduct performance reviews for this position.

4) Finance

Accounting and Budget Division

- (a) Comptroller
- (b) Yolanda Rivera Rivera
- (c) The Comptroller is responsible for the preparation of Budget Operations and the development and implementation of procedures, guidelines and accounting standards of PREPA and the Irrigation Systems. It is also responsible for the accounts, records and bookkeeping which reflect the agency's transactions, property and funds, in accordance with accounting principles, as well as preparing financial statements and other reports required by law.
- (d) PREPA currently does not conduct performance reviews for this position.

Treasury Division

- (a) Treasurer
- (b) José Hernández Colón
- (c) The Treasurer is responsible for the planning and efficient administration of the agency's financial program analysis and financial transactions to determine its effect on the transfer of funds, compliance with the provisions of the trust agreements and other contracts. Also, is responsible for the investment portfolio management, development of the financial short and long term plans, and developing administrative guidelines. It is also responsible for the receipt, disbursement and investment of funds, management of the regional administration payment offices, and payroll.
- (d) PREPA currently does not conduct performance reviews for this position.

5) Planning and Environmental Protection

Environmental Protection and Quality Assurance Division

- (a) Division Head
- (b) Eng. Rafael Marrero Carrasquillo
- (c) The Environmental Protection and Quality Assurance Division Head is responsible for the preparation, coordination and implementation of a work program so that the generation, transmission and distribution projects development is compatible with all environmental protection laws and regulations. Also is responsible for developing and implementing the corporate environmental compliance policies.
- (d) PREPA currently does not conduct performance reviews for this position.

Planning and Research Division

- (a) Division Head
- (b) Eng. Efran Paredes Maisonet
- (c) The Planning and Research Division Head is responsible for the technical and economic planning of the Puerto Rico's electrical system. Also is responsible for developing and managing PREPA's Capital Improvement Program and evaluating the Sales and Revenue Forecast.
- (d) PREPA currently does not conduct performance reviews for this position.

6) Human Resources and Labor Affairs

Personnel Division

- (a) Division Head
- (b) Mónica Hernández Plaza
- (c) The Personnel Division Head is responsible for the management of human resources, which is governed by laws, rules and procedures in accordance with the areas essential to the merit principle. This includes the recruitment of new personnel, selection, job classification, job retention, transfers, promotions, demotions and trainings.
- (d) PREPA currently does not conduct performance reviews for this position.



Labor Affairs Division

- (a) Division Head
- (b) Edna L. Ríos González, Esq.
- (c) The Labor Affairs Division is responsible for the negotiation of collective agreements with the several unions, issue administrative and legal opinions and consultations following industry standards, procedures and labor laws and acts, counsel the management personnel regarding disciplinary procedures, personnel policies, labor legislation, mandatory decrees, Labor Relations Board decisions, Supreme Court decisions and Bureau Conciliation and Arbitration Department of Labor and Human Resources decisions, represent the Authority in the Board of Labor Relations of Puerto Rico, and before the courts in labor cases.
- (d) PREPA currently does not conduct performance reviews for this position.

Occupational Health Division

- (a) Division Head
- (b) Sandra Medina Burgos
- (c) The Occupational Health Division Head is responsible for managing the corporate health policy according to the federal and state rules, procedures, laws and regulations. Also is responsible for the administration and management of the corporate health plan.

7) Legal Affairs

Real-estate and Notary Division

- (a) Division Head
- (b) Jaime J. Ortiz Rodríguez, Esq.
- (c) The Real-estate and Notary Division Head is responsible for the notary services, as well as the required legal transactions related to the real-estate matters.
- (d) PREPA currently does not conduct performance reviews for this position.

Litigation Division

- (a) Division Head
- (b) Carlos M. Aquino Ramos, Esq.
- (c) The Litigation Division Head is responsible for representing the Authority in cases filed by or against the Authority in the courts, including those related to the

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area of labor law, and other matters before administrative and quasi-judicial bodies.

(d) PREPA currently does not conduct performance reviews for this position.

Opinions, Legislation and Contracts Division

(a) Division Head

(b) Joel Ayala Hernández, Esq.

(c) The Opinions, Legislation and Contracts Division Head is responsible for legal counseling in relation to contractual matters and legislation processes.

(d) PREPA currently does not conduct performance reviews for this position.

8) Infrastructure and Operations Administration

Supplies Division

(a) Division Head

(b) Ramón O. Caldas Pagán

(c) The Supplies Division Head is responsible for the supplies purchase processes including the custody and control of inventories, stocks and warehouses. Also is responsible for the procurement and award process of fuel contracts.

(d) PREPA currently does not conduct performance reviews for this position.

General Services Division

(a) Division Head

(b) Juan E. Cruz Figueroa

(c) The General Services Division Head is responsible for managing the postal and courier services, printing services and the transportation center. Also is responsible for the maintenance and conservation the infrastructure.

Land Transportation Division

(a) Division Head

(b) Juan R. Rovira

(c) The Land Transportation Division Head is responsible for managing the maintenance and repair services of the ground transportation fleet.

(d) PREPA currently does not conduct performance reviews for this position.

3. **CEPR-SH-001-003: Describe and assess the flexibility that PREPA's top management has to calibrate the compensation of PREPA employees based on the quality of performance. Answer separately for executives, managers and line employees. Your answer should evaluate the extent to which PREPA's flexibility is constrained by Section 11 of Act 66-2014 and Act 66-2013.**

The following response was provided by Javier Quintana, the Executive Director of PREPA.

Currently the compensation of PREPA's employees is not based on the quality of their performance. PREPA's employees' retribution is established in the Classification and Retributions Plan and is based on personnel actions required for promotions. In order to executives and managers to increase their compensation, it is necessary for them to earn a promotion. Line employees receive their compensation according to their collective bargains agreements.

According with Act 66-2013 and Act 66-2014, PREPA is constrained from granting bonuses and salary increases due to years of services, merit, competencies. PREPA can give pay increases to the employees is PREPA demonstrates to OGP that the promotion results in savings.

6. **CEPR-SH-001-006: Direct Testimony at 12-13 - You describe the business plan as containing the following elements: "implementing revenue improvement and cost reduction plans, overseeing cash and liquidity management activities, improving PREPA's ability to analyze, track, and collect accounts receivable, improving PREPA's capital expenditure plan, and developing plans to improve PREPA's generation, transmission, distribution, and other operations." With respect to each of these elements (and any others not mentioned):**

- a. **Describe the quantitative and qualitative goals for improvement;**

The following response was provided by Javier Quintana, the Executive Director of PREPA.

The details of the elements of the business plan are described in more detail within the panel testimony of Ms. Miranda, Mr. Sosa and Mr. Sales, but the quantitative and qualitative improvements include;

- A. Improving PREPA's capital expenditure plan

Modernizing and improving PREPA's infrastructure is an essential part of the business plan and the capital expenditure was in large part developed based on the IRP. The plan includes ~\$3.2 billion of investments in new infrastructure with the objectives of enabling PREPA to comply with environmental regulations, integrate renewables, and improving system reliability and efficiency.

- B. Improving fuel procurement and generation

The business plan projects annual run-rate savings of ~~~\$135 million~~ ~\$110 million as well as one-time liquidity improvements of ~\$86 million. These savings are supported by several key initiatives, including;

- i. Improved fuel forecasting process which has enabled PREPA to reduce inventory levels. The forecasting process is imbedded in a new Sales and Operations Planning (S&OP) process
- ii. Fuel RFP processes for fuel oil #2 and #6 and LNG reducing adders and improving credit terms
- iii. Improved coordination between functions enabling PREPA to continually optimize dispatch
- iv. Root cause analysis of forced outage events to identify systemic addressable problems. Key corrective actions focused around training of key personnel, improved preventative maintenance planning and execution. Improving reliability of PREPA generation fleet is projected to enable reduced spinning reserve which in turn leads to incremental fuel savings

C. Improvements to Customer Service and collection efforts

The business plan projects annual run-rate savings of ~~-\$200 million~~ ~\$50 million as well as one-time liquidity improvements of ~~-\$165 million~~ ~\$91 million. These savings are supported by several key initiatives, including;

- i. Non-government collections have been improved through the implementation of a program including streamlining service suspension processes and targeting customer groups with high delinquency rates
- ii. Improvements to Government customer collections have focused on reconciling account to address disputed amount and subsequently negotiated payment plans with corporations and agencies
- iii. PREPA has also engaged third party collections firms to focus on severely past due accounts, which previously were not actively being pursued for collections
- iv. PREPA has reorganized its department focused on identifying and addressing electricity theft and is deploying improved technology and deploying more field agents to fight theft
- v. Actions are being taken to improving PREPA's customer experience. A comprehensive program is being executed and progress seen in several areas – call center wait times, for examples, has been reduced from twenty five to twelve minutes

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D. Improvements within Operations and Infrastructure

The business plan projects annual run-rate savings of ~~~\$200 million~~ ~\$55 million as well as one-time liquidity improvements of ~~~\$165 million~~ ~\$25 million. These savings are supported by several key initiatives, including;

- i. PREPA is improving its vehicle fleet management processes by increased accountability via tracking of vehicle KPI's, such as out of service metrics. In addition, a vehicle renewal program is contemplated to modernize the fleet and increase vehicle safety and reliability. Finally, PREPA is conducting an RFP to outsource the maintenance and repair of light and medium duty vehicles in order to increase overall capacity to maintain the fleet
- ii. PREPA is increasingly using RFP processes to drive increase usage of standard SKU as well as secure more favorable pricing
- iii. Introduction of detailed metrics and closer coordination between procurement and warehousing is enabling PREPA to reduce its inventory levels and level of obsolete inventory

E. Improvements within Labor and Human Resources

- i. PREPA is working with DuPont, an industry leading firm, to develop a program to improve the safety culture at PREPA. The program will include employee training as well as new safety equipment. Progress of the improvement program is being tracked through a dashboard
- ii. Approximately 1,100 employees have retired from PREPA since 2014 with significant additional retirees projected in the next few years. In response to this PREPA is developing a succession plan to identify potential candidates to fill critical roles as well as any training required to fill potential skill gaps
- iii. A KPI dashboard have been developed and piloted and will be rolled out across PREPA directorates to ensure departments are aligned on key objectives and provide PREPA a consistent approach to deal with reviews and performance management
- iv. PREPA has selected a new vendor for health benefits and is evaluating options relative to pension plan options

C. Questions for Witness Donahue

2. **CEPR-SH-001-010: Describe and assess the flexibility that PREPA's top management has to calibrate the compensation of PREPA employees based**

on the quality of performance. Answer separately for executives, managers and line employees. Compare and contrast such flexibility with that which exists in other companies with which you are familiar.

The following response was provided by Lisa Donahue, the CRO of PREPA.

As described in the response to CEPR-SH-001-003, PREPA generally does not have the flexibility to calibrate compensation based on performance. PREPA also does not have flexibility to calibrate Line employees as they are compensated according to their collective bargaining. While not atypical for Government Corporations, this inflexible compensation structure is different from most Corporations where a compensation range typically exists for each level within an organization. In these companies annual merit increases as well as discretionary bonuses are in part determined based on each employee's individual performance and contributions, which provides managers an ability to reward employees meeting or exceeding their objectives, and provide employees with greater incentive to so.

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**SWORN STATEMENT IN SUPPORT OF ANSWERS
AS PER COMMISSION REQUIREMENTS**

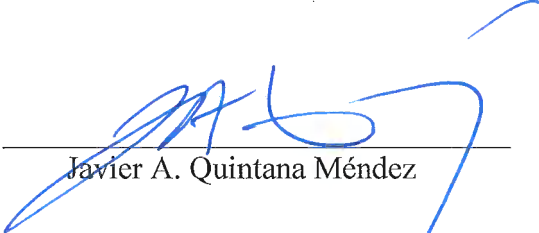
I, Javier A. Quintana Méndez, of legal age, engineer, married, and resident of Guaynabo, Puerto Rico, in my capacity as Executive Director of the Puerto Rico Electric Power Authority ("PREPA"), under oath declare as follows:

1. My name and personal circumstances are those stated above. If called as a witness, I could testify competently as to the subject matter of this Affidavit.
2. The information supplied herewith comes from the records and information known by management and is held as true by the Puerto Rico Electric Power Authority.
3. I believe the information included in these answers is true on the basis of my personal knowledge or on the basis of the information supplied to me by employees and advisors of PREPA. I have specified for each of the requirements copied above the person or persons who supplied the relevant information for answering.
4. For all the requirements set forth above, moreover, the PREPA's counsel assisted in preparing these answers. Such assistance was provided pursuant to the attorney-client privilege and/or work product doctrine, which the Authority does not waive.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on July 20, 2016.

Affidavit No. 1888



Javier A. Quintana Méndez

Sworn and subscribed before me by Javier A. Quintana Méndez, of the personal circumstances above mentioned, whom I personally know, in San Juan, Puerto Rico, on July 20, 2016.



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that I have sent the above PREPA'S 3rd AND FINAL SET OF RESPONSES TO THE THIRD REQUIREMENTS OF INFORMATION OF THE STAFF OF THE PUERTO RICO ENERGY COMMISSION to the Puerto Rico Energy Commission, to its General Legal Counsel, Gustavo Bonet Martinez, Esq., at gbonet@energia.pr.gov, and to Alejandro Figueroa Ramirez, Esq., at afigueroa@energia.pr.gov, to Tania M. Negrón Vélez, Esq., at tnegron@energia.pr.gov, and to legal@energia.pr.gov, on July 20, 2016.



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