

BEFORE THE GUAM PUBLIC UTILITIES COMMISSION



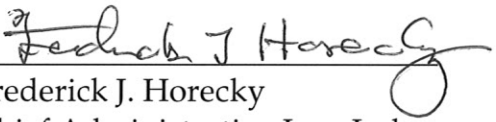
IN THE MATTER OF:) GPA Docket 21-06
)
The Application of the Guam Power) PUC REQUESTS FOR INFORMATION
Authority to Approve the Piti 8&9)
Contract for Conversion to ULSD with)
Marianas Energy Company.)

The Guam Public Utilities Commission hereby requests that the Guam Power Authority respond to the following Requests for Information on or before Wednesday, February 17, 2021:

1. Please provide a copy of the MEC Proposal that is referred to as "Appendix A" in GPA Resolution No. 2021-01.
2. Provide a copy of the NAAQS Standards which are referred to in the GPA Petition which are stated to be effective in April 2023.
3. In GPA Docket 20-16, GPA requested that PUC authorize the retirement of the Piti 8&9 plants. GPA took the position that these plants would be unnecessary after the development of the new power plant, and that the Aggreko 40MW plants provided a more efficient and less costly alternative to the Piti plants. Please explain in detail the reasons why GPA has now, in this Docket, abandoned its prior plan to retire the Piti 8&9 plants, and why is now believes that it is crucial to maintain the Piti plants.
4. Provide copies of any and all documents, records or other materials which support GPA's decision not to retire the Piti 8&9 plants. GPA should also provide any analysis, explanation or other written justification for GPA's decision not to retire the Piti 8&9 plants.
5. In its Petition, GPA has now referenced the April 2023 NAAQS Standards as justification for conversion of the Piti plants to ULSD. Explain how and why such standards require the conversion of Piti 8&9 to ULSD.
6. When were the April 2023 NAAQS Standards enacted? When did GPA become aware of such standards? Was GPA not aware of such standards when it requested the PUC to retire the Piti plants in GPA Docket 20-16?
7. Please provide a copy of the referenced "contract" between GPA and MEC for the conversion of the Piti 8&9 plants to ULSD.

8. Why do GPA and the CCU now believe that Piti 8&9 are “crucial” to provide required energy for the island between now and the commissioning of the new 198-MW Ukudu Power Plant?. In GPA Docket 20-16, GPA took the position that the Piti 8&9 plants are not needed and that Aggreko plants (40MW) could provide necessary energy instead. What is the basis for GPA’s change in position?
9. A Consent Decree entered between USEPA and GPA provide existing deadlines for the conversion of the Piti plants to ULSD: GPA is required to enter a Contract for conversion by July 1, 2020, and to provide for full conversion to ULSD-firing by December 31, 2021. Is it correct that GPA did not meet the deadline for July 1, 2020?
10. GPA indicates there have been “amicable discussions” between GPA and USEPA for change in the timelines to reflect a March 31, 2021 deadline for completion of the contract for conversion, and for conversion to be completed by August 31, 2022. Has USEPA approved the new deadlines? Has the consent order been amended to incorporate the new timelines? Are there any written approvals for the new timelines? If so, please provide such approvals.
11. GPA has determined that, to comply with the April 2023 NAAQS, the Piti 8&9 plant capacity for burning low sulfur residual fuel oil would need to be limited by as much as 20%, which would have a negative impact on system reliability. What is the basis for GPA’s determination that the Piti plant capacity burning low sulfur residual fuel oil would need to be limited by 20%? Does GPA have any written analysis or explanation to support this conclusion?
12. If the Piti 8&9 plants could still operate at 80% capacity, why would that level not provide sufficient capacity?
13. Aside from the issues of the April 2023 NAAQS, isn’t GPA still required to convert the Piti plants to ULSD under the USEPA Rules relating to SO_x and CO emissions?
14. In addition to the \$14M cost of converting the Piti plants to ULSD, the CCU indicates that the fuel supply system would be separately funded and handled by GPA. What would be the cost of funding and handling of a Fuel Supply System for the Piti plants? Please provide any prepared budget.
15. GPA indicates that the funding for the conversion will be paid for from the Cabras 3&4 insurance proceeds. Please state the present balance of unexpended Cabras 3&4 insurance proceeds. Also, provide a complete accounting of all expenditures that have been made from the Cabras 3&4 insurance proceeds.

Submitted this 10th day of February 2021.


Frederick J. Horecky
Chief Administrative Law Judge