

BEFORE THE GUAM PUBLIC UTILITIES COMMISSION



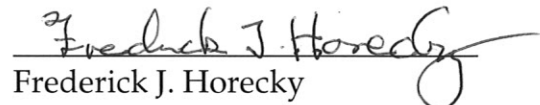
IN THE MATTER OF:) GPA Docket 21-07
)
The Application of the Guam Power)
Authority to Approve the Amendment to) PUC REQUESTS FOR INFORMATION
the Energy Conversion Agreement (ECA))
with KEPCO for the 198MW Power Plant.)

The Guam Public Utilities Commission hereby requests that the Guam Power Authority respond to the following Requests for Information on or before Thursday, February 18, 2021:

1. In its Petition, GPA requests that the PUC approve its amendment to the Energy Conversion Agreement (ECA) with KEPCO for the 198MW Power Plant. Please provide a copy of the actual amendment to the ECA that PUC is being requested to approve. A copy of the amendment negotiated between GPA and KEPCO should be provided to PUC.
2. Provide a copy to PUC of the "Agreement" between GPA and KEPCO, referenced in CCU Resolution 2021-02 as "Attachment A".
3. In the original ECA, GPA and KEPCO agreed that KEPCO would construct a 65MW standby diesel plant at the Ukudu site. Now GPA and KEPCO are revising the ECA to provide for a smaller diesel facility of 41MW to be constructed near the GPA Cabras Fuel Oil Storage facility. Please explain why the size of the diesel engine facility has been reduced from 65MW to 41MW.
4. GPA has indicated that, if USEPA approves minor source permitting, the Cabras facility would be able to run annually for more hours than the originally proposed Ukudu diesel facility. Please explain the difference in run times between the two facilities and the basis for GPA's belief that a Cabras diesel facility will allow additional run time. Specify the run times for each facility and how those run times are determined/calculated.
5. Explain why it is necessary to shift the location of the diesel plant from Ukudu to Cabras.
6. Is it correct that USEPA has not yet approved a modification of the Consent Decree to reflect the proposed new power plant minor source air permit schedule? When is it anticipated that the minor source designation will be approved?
7. Has USEPA approved the relocation of the diesel facility from Ukudu to Cabras?

8. Has USEPA yet approved an amendment to the ECA to change the new Commercial Operation Date (COD) to April 2024?
9. GPA indicates that it and KEPCO have negotiated an amendment which will provide a fixed O&M cost of \$2M annually for plant operation. Please provide to PUC an explanation of how the \$2M amount was arrived at and the justification for such amount.
10. Provide any available documentation to PUC which establishes the budget and costs for running the proposed Cabras diesel facility. Indicate all cost factors to which the \$2M is applicable.
11. How did GPA determine that the variable O&M cost would be \$0.025 kWh net production when dispatched by GPA? Explain the basis for this cost determination.
12. CCU Resolution No. 2021-02 indicates that a proposed amendment "increases the contract cost above the GPA General Manager's approval authority...". What is the GPA General Manager's present approval authority, and by how much does the amendment increase the contract cost? Please provide the breakdown/budget for such increased costs and all elements included in such costs.

Submitted this 11th day of February 2021.


Frederick J. Horecky
Chief Administrative Law Judge