

BEFORE THE GUAM PUBLIC UTILITIES COMMISSION



IN THE MATTER OF: ) GPA Docket 23-21  
)  
GUAM POWER AUTHORITY BUCKET )  
TRUCKS )  
) PUC REQUESTS FOR INFORMATION  
)  
)  
)

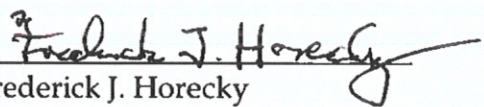
The Guam Public Utilities Commission ["PUC"] hereby requests that the Guam Power Authority ["GPA"] respond to the enclosed Requests for Information on or before August 24, 2023.

1. GPA indicates that it presently owns 27 bucket trucks. Please provide a listing indicating which trucks are presently operational, date each was purchased, the estimated useful life of each and whether required maintenance has been provided.
2. GPA indicates that it received a single bucket truck price quote from Morrico at \$337,440.00. GPA now indicates that it estimates the price for each truck at \$500,000.00. Couldn't GPA order the trucks locally as the price quoted by Morico?
3. Please provide all evidence or materials upon which GPA estimated the cost of bucket trucks at \$500,000 each.
4. GPA indicates that it "used 20-30 bucket trucks throughout its recent restoration efforts, which included the 9 to 12 additional bucket trucks provided on loan by FEMA and the Navy." Can GPA provide a more precise number of the bucket trucks that were actually used during the typhoon restoration? If GPA only used 20 bucket trucks during the restoration, which included the nine to twelve additional bucket trucks provided by FEMA and the Navy, does this mean that GPA only used 8 of its own bucket trucks? Please provide clarification of these divergent numbers.
5. Could it not be assumed that, in the event of another typhoon, either 9 to 12 bucket trucks, or some lesser number of bucket trucks, could be provided to GPA on loan by FEMA and the Navy? Isn't it preferable to borrow bucket trucks from FEMA and Navy rather than incurring the expense for additional trucks?
6. GPA claims this was the fastest restoration from a typhoon in history. Yet GPA claims that "immediate access to additional bucket trucks prove challenging." Was GPA not able to meet this challenge? If GPA claims that it does not have sufficient bucket trucks, please provide materials, written reports, or any explanation or other

written evidence indicating that GPA did not have sufficient bucket trucks to meet the challenges of restoration.

7. Was the lack of bucket trucks a reason for a slower restoration? If so, provide any written report or other evidence that supports such a conclusion.
8. In a prior docket where GPA sought to purchase bucket trucks, GPA Docket 15-23, GPA provided a Cost-Benefit analysis indicating that there would be a beneficial cost-benefit ratio with a purchase of new bucket trucks and the replacement of old trucks. Has GPA prepared any such analysis for this present request? If not, why not?
9. PUC Commissioner Pedro Guerrero is concerned that after Marwar, the number of bucket trucks was not the issue in fixing the power lines, but that vegetation clearing was not given the attention it needed. He further indicates that 80% of the downed power lines were created by vegetation hitting the power line. Does GPA concur with Commissioner Guerrero's concerns? Are his concerns legitimate? If not, why not?
10. Is there a pressing or immediate need for bucket trucks? If so, please indicate such need and provide a justification. Isn't the timing of another typhoon event such as Mawar rather speculative?
11. Are there other current issues, such, such as a lack of generation load capacity and load shedding, that are higher priorities for the allocation of \$5M (rather than for the purchase of bucket trucks)?
12. In its Petition, GPA asks PUC to approve the purchase of ten (10) bucket trucks at a cost of up to \$5M. Is this request consistent with the Contract Review Protocol? Wouldn't the proper approach under the Protocol be for the PUC to approve a procurement, and then have GPA come back to the PUC for subsequent approval of a price after the procurement has been completed?

Submitted this 21<sup>st</sup> day of August, 2023.

  
Frederick J. Horecky  
Chief Administrative Law Judge