01-28-09

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

---- In the Matter of ----	)	Docket No. 2008-0273
	)	
PUBLIC UTILITIES COMMISSION	)	
	)	
	)	
Instituting a Proceeding to Investigate the Implementation of Feed-in Tariffs	)	
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HAWAII RENEWABLE ENERGY ALLIANCE INFORMATION REQUESTS

ON THE

JOINT FEED-IN TARIFF PROPOSAL

OF

HAWAIIAN ELECTRIC COMPANY, INC. AND THE CONSUMER ADVOCATE

AND

CERTIFICATE OF SERVICE

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In accordance with schedule for the instant docket as approved by the Commission in its Decision and Order, dated January 20, 2009, the Hawaii Renewable Energy Alliance ("HREA") respectfully offers its Information Requests to Hawaiian Electric Company ("HECO") and the Consumer Advocate ("CA") on their Joint Feed-In Tariff Proposal.

HREA respectfully submits the following five information requests ("IRs") with the suggestion that reaching agreement on them could lead to an initial foundation of five principals in a Feed-In Tariff structure for Hawaii:

HREA-HECO/CA-IR-1. Would HECO and the CA support an option for customers to choose either a: (i) net metering agreement, or (ii) Feed-In Tariff for wind, solar, biomass and hydro projects up to 500 kW, and if not, why not? Note: HREA's rationale to allow these customer options (or choices) is as follows. We believe net metering agreements would be appropriate and the most likely choice for those customer that want to off-set a portion up to their full load. Similarly we believe Feed-in Tariffs would be appropriate and the most likely choice for those customers that want to be net energy producers.

HREA-HECO/CA-IR-2. Would HECO and the CA support an option for customers to: (i) choose a Feed-in Tariff for solar projects, or (ii) elect to negotiate, as an exemption to the Competitive Bidding Framework, a power purchase agreement ("PPA") with HECO for solar and other renewable projects 500 kW to 5 MW, and if not, why not? Note: HREA's rationale in this case is simply to allow for customer choice as to the best contractual arrangement for their renewable project, and we also note that the 5 MW limit currently applies to HECO, while project exemptions for MECO and HELCO would be approximately 2.7 MW.

HREA-HECO/CA-IR-3. Would HECO and the CA support a recommendation to the Commission for increase the threshold for exemptions from the Competitive Bidding Framework for projects from 5 MW to 20 MW, and if not, why not? Note: HREA believes this increase in the exemption threshold will dramatically facilitate the increased use of renewables in our islands.

HREA-HECO/CA-IR-4. Would HECO and the CA: (i) agree that project size and the total number of projects should be limited only by distribution circuit criteria and system operational and safety requirements that would be determined in Interconnection Requirements Studies conducted by HECO and paid for by the project developer, and (ii) collaborate closely with industry and others to identify and remedy distribution feeder and transmission line "bottlenecks," and if not, why not? Note: HREA's rationale is that we simply have to maximize DG applications on distribution feeders and larger wholesale renewable projects on transmission lines in order to meet the HCEI objectives.

HREA-HECO/CA-IR-5. Would HECO and the CA agree, in light of the current level of market penetration of renewables: (i) that an extensive analysis of project cost data may not be of much value in establishing FiT payment rates, and (ii) it is appropriate and prudent to set rates based on a consensus process to establish rates that are fair and will move the market, and if not, (i) what level of analysis is required and (ii) how long and at what cost would HECO and the CA estimate it would take to conduct said analysis? Note: HREA believes that there is indeed a tradeoff to be made between further study and moving forward with the Feed-In Tariff Program in an expeditious and prudent manner.

President, HREA

CERTIFICATE OF SERVICE

The foregoing HREA Response was served on the date of filing by Hand Delivery or electronically transmitted to each such Party as follows.

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DATED: Honolulu, Hawaii, January 26, 2009