

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

FILED

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PUBLIC UTILITIES
COMMISSION

In the Matter of the Application of)
)
HAWAII ELECTRIC LIGHT COMPANY, INC.)
)
For Approval of General Rate Case and)
Revised Rate Schedules and Rules)
_____)

DOCKET NO. :

2015-0170

HAWAII ELECTRIC LIGHT COMPANY, INC.

NOTICE OF INTENT

MOTION TO EXTEND DATE TO FILE RATE CASE AND
FOR APPROVAL OF TEST PERIOD WAIVER

AFFIDAVIT OF JOSEPH P. VIOLA

and

CERTIFICATE OF SERVICE

Joseph P. Viola
Vice President
HAWAII ELECTRIC LIGHT COMPANY, INC.
P. O. Box 2750
Honolulu, Hawaii 96840

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAI'I

In the Matter of the Application of)
HAWAI'I ELECTRIC LIGHT COMPANY, INC.)
For Approval of General Rate Case and)
Revised Rate Schedules and Rules)
_____)

DOCKET NO. 2015-0170

NOTICE

HAWAI'I ELECTRIC LIGHT COMPANY, INC. ("Hawai'i Electric Light" herein), whose executive offices are located at 1200 Kilauea Avenue, Hilo, Hawai'i, respectively serves notice that:

1. Pursuant to Section 6-61-85 of the Rules of Practice and Procedure before the Public Utilities Commission, Title 6, Chapter 61 of the Hawai'i Administrative Rules ("Rules of Practice and Procedure"), Hawai'i Electric Light intends to file an application for a general rate increase ("rate case") by December 30, 2016 and use a calendar year 2016 test period in support of said rate case contingent upon Commission approval of Hawai'i Electric Light's Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver, filed simultaneously herewith.¹

¹ If Hawai'i Electric Light's Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver is not approved, it would be required to file a 2016 test year rate case by December 31, 2015, in accordance with the mandatory triennial rate case cycle requirement explained below and Section 6-61-87 of the Hawai'i Administrative Rules.

2. Communications regarding this notice should be addressed to:

Dean K. Matsuura
Manager, Regulatory Rate Proceedings
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawaii 96840-0001

3. Hawai'i Electric Light's filing of a 2016 test year rate case would be pursuant to the Final Decision and Order in Docket No. 2008-0274 ("Decoupling Proceeding"), which established a mandatory triennial rate case cycle.² The Final Decision and Order states the following at 129:

So that the commission and the Consumer Advocate have a regular opportunity to evaluate decoupling and re-calibrate RAM inputs using commission-approved values, the HECO Companies shall file staggered rate cases every three years, unless otherwise ordered by the commission, commencing as proposed in the Amended Joint Proposal, with HECO's 2011 test year rate case, followed by either MECO's or HELCO's test year rate cases of 2012 and then MECO's or HELCO's test year rate cases of 2013.

4. Hawai'i Electric Light last filed an application for approval of a general rate increase and revised rate schedules and rates on August 16, 2012 in Docket No. 2012-0099 (Hawai'i Electric Light's 2013 test year rate case).³ The next rate case in the triennial rate case cycle would be a Hawai'i Electric Light 2016 test year rate case to be filed in 2015.

² The *Joint Final Statement of Position of the HECO Companies and the Consumer Advocate* proposed a triennial rate case cycle. The Final Decision and Order, issued on August 31, 2010 in Docket No. 2008-0274, approved the *Joint Final Statement of Position of the HECO Companies and Consumer Advocate*, filed on May 11, 2009, as amended by filings on June 25, 2009 and July 13, 2009, and modified by the proposals in the *HECO Companies' Motion for Interim Approval of a Decoupling Mechanism*, filed on November 25, 2009, to the extent agreed-upon by the Hawaiian Electric Companies and the Division of Consumer Advocacy of the Department of Commerce and Consumer Affairs ("Consumer Advocate"). The "HECO Companies" or "Hawaiian Electric Companies" are Hawaiian Electric Company, Inc. ("Hawaiian Electric"), Maui Electric Company, Limited ("Maui Electric"), and Hawai'i Electric Light.

³ On January 28, 2013, Hawaiian Electric and the Consumer Advocate filed a *Stipulated Settlement Agreement between the Hawaiian Electric Companies and the Division of Consumer Advocacy regarding Certain Regulatory Matters* in Docket No. 2008-0083 ("Stipulated Settlement"). Among other things, the Stipulated Settlement called for Hawai'i Electric Light to withdraw its 2013 test year rate case. Stipulated Settlement at 2. On March 19,

5. Hawai'i Electric Light is filing simultaneously herewith a Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver ("motion for waiver"), requesting Commission approval to file a rate case by December 30, 2016, based on a 2016 calendar year test period.

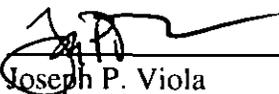
6. Hawai'i Electric Light's rate case filing will be based on factors such as the operations and maintenance expenses and investments in plant and equipment estimated for the 2016 test year.

7. As a result, Hawai'i Electric Light's return on utility property used and useful for public utility purposes may be lower than that required to provide a fair return during the period when the proposed rates will be in effect. Any proposed rate relief would be intended to provide Hawai'i Electric Light with an opportunity to earn a fair return on its utility property used and useful for utility purposes. Hawai'i Electric Light has not yet determined its 2016 test year revenue requirement.

8. Hawai'i Electric Light will not implement any of the rate changes that may be proposed in its application until after its application is filed and reviewed by the Commission and the Consumer Advocate, and the Commission issues an interim or final decision and order on the application and approves or modifies the proposed rates.

DATED: Honolulu, Hawai'i, June 17, 2015.

HAWAI'I ELECTRIC LIGHT COMPANY, INC.

By 
Joseph P. Viola
Vice President

2013, the Commission approved the Stipulated Settlement, subject to certain clarifications, in Order No. 31126, and the docket was closed by Order No. 31133, issued on March 27, 2013.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAI'I

In the Matter of the Application of)
)
HAWAI'I ELECTRIC LIGHT COMPANY, INC.)
) DOCKET NO. _____
)
For Approval of General Rate Case and)
Revised Rate Schedules and Rules)
_____)

MOTION TO EXTEND DATE TO FILE RATE CASE AND
FOR APPROVAL OF TEST PERIOD WAIVER

HAWAI'I ELECTRIC LIGHT COMPANY, INC. ("Hawai'i Electric Light" or "Company") respectfully moves the Commission for an extension of the date by which to file its application for a rate case ("rate case") from 2015 to no later than December 30, 2016, and to allow it to use a calendar year 2016 test period in support of said rate case. Hawai'i Electric Light files this motion pursuant to Sections 6-61-41 and 6-61-92 of the Commission's Rules of Practice and Procedure, Title 6, Chapter 61 of the Hawai'i Administrative Rules ("HAR"). No hearing is requested on this motion.

I.

Hawai'i Electric Light, whose executive office is located at 1200 Kīlauea Avenue, Hilo, Hawai'i, is a corporation duly organized under the laws of the Kingdom of Hawai'i on or about December 5, 1894, and now exists under and by virtue of the laws of the State of Hawai'i.

Hawai'i Electric Light is an operating public utility engaged in the production, purchase, transmission, distribution and sale of electricity on the island of Hawai'i.

II.

Correspondence and communications regarding this motion should be addressed to:

Dean K. Matsuura
Manager, Regulatory Rate Proceedings
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawai'i 96840-0001

III.

Simultaneously with this Motion, Hawai'i Electric Light has filed a notice of intent to file an application for a rate case based on a 2016 calendar test year period by December 30, 2016, pursuant to HAR § 6-61-85. The notice states that Hawai'i Electric Light's filing for a 2016 test year rate case would be in accordance with the Final Decision and Order in Docket No. 2008-0274 ("Decoupling Proceeding"), which established a mandatory triennial rate case cycle. The notice states that Hawai'i Electric Light's rate case will be based on factors such as the operations and maintenance expenses and investments in plant and equipment that are required to maintain the electric grid, maintain system reliability, and to plan for and acquire additional renewable energy resources required by Hawai'i's Renewable Portfolio Standards in § 269.92 of the Hawai'i Revised Statutes. Hawai'i Electric Light has not yet determined its 2016 test year revenue requirement.

On May 29, 2015, Hawai'i Electric Light filed its 2014 Annual Report with the Commission, which included information in a FERC Form No.1 format.

IV.

A. Request to Extend Date to File Rate Case

Because of the circumstances hereinafter set forth, Hawai'i Electric Light requests an extension of the date by which it must file its rate case, from 2015 to December 30, 2016.

Hawai'i Electric Light's filing of a 2016 test year rate case would be in accordance with the mandatory triennial rate case cycle established by the Commission:

So that the commission and the Consumer Advocate have a regular opportunity to evaluate decoupling and re-calibrate RAM inputs using commission-approved values, the HECO Companies shall file staggered rate cases every three years, unless otherwise ordered by the commission, commencing as proposed in the Amended Joint Proposal, with HECO's 2011 test year rate case, followed by either MECO's or HELCO's test year rate cases of 2012 and then MECO's or HELCO's test year rate cases of 2013.

Final Decision and Order, issued on August 31, 2010 in Docket No. 2008-0274, at 129.¹

Hawai'i Electric Light last filed an application for approval of a general rate increase and revised rate schedules and rates on August 16, 2012 in Docket No. 2012-0099 (2013 test year rate case).² The next rate case in the triennial rate case cycle would be Hawai'i Electric Light's 2016 test year rate case, to be filed in 2015.

However, on January 29, 2015, the Hawaiian Electric Companies and NextEra Energy, Inc. ("NextEra Energy") filed an application in Docket No. 2015-0022 requesting Commission approval of a change of control of the Hawaiian Electric Companies from Hawaiian Electric Industries, Inc. ("HEI") to Hawaiian Electric Holdings, a wholly owned subsidiary of

¹ The "HECO Companies" or "Hawaiian Electric Companies" are Hawaiian Electric Company, Inc. ("Hawaiian Electric"), Maui Electric Company, Limited ("Maui Electric"), and Hawai'i Electric Light.

² On January 28, 2013, Hawaiian Electric and the Consumer Advocate filed a *Stipulated Settlement Agreement between the Hawaiian Electric Companies and the Division of Consumer Advocacy regarding Certain Regulatory Matters* in Docket No. 2008-0083 ("Stipulated Settlement"). Among other things, the Stipulated Settlement called for Hawai'i Electric Light to withdraw its 2013 test year rate case. Stipulated Settlement at 2. On March 19, 2013, the Commission approved the Stipulated Settlement, subject to certain clarifications, in Order No. 31126, and the docket was closed by Order No. 31133, issued on March 27, 2013.

NextEra Energy (“Change of Control Application”).³ In that application, NextEra Energy committed that, subject to certain qualifications, for at least four years following the closing of the proposed change of control, the Hawaiian Electric Companies will not submit any applications seeking a general base rate increase (“Proposed Rate Case Moratorium”). *See* Change of Control Application at 34-37. The Commission’s initial procedural schedule in the Merger Docket requires that submission of written testimonies will be completed by August 31, 2015 and discovery may continue through September 30, 2015.⁴

The Proposed Rate Case Moratorium, of course, is subject to Commission approval. Hawai‘i Electric Light does not presume or intend to suggest any expectation on how and when the Commission will rule on the Change of Control Application or the Proposed Rate Case Moratorium. However, because it could avoid potentially unnecessary expenditure of valuable time and resources for all concerned, Hawai‘i Electric Light respectfully submits that it is reasonable to defer its filing of a 2016 test year rate case until such time as a decision and order on the Change of Control Application in the Merger Docket may be issued.

Hawai‘i Electric Light will have to expend significant time, effort, resources and dollars to prepare and file its rate case before the end of 2015 and then prosecute the case thereafter. Once filed, the Consumer Advocate and any permitted intervenors would likewise spend significant time, expenses, effort and resources evaluating the rate case filing, conducting discovery and formulating positions, and the Commission would spend its time, effort and resources reviewing the filing and administering and preparing to adjudicate the rate case.

However, it is conceivable that Hawai‘i Electric Light would seek to withdraw the rate case if, in the meantime, the Proposed Rate Case Moratorium were approved in the Merger

³ Docket No. 2015-0022 will be referred to hereinafter as the “Merger Docket.”

⁴ *See*, Order No. 32739 at 4-5.

Docket. This would result in the rate case efforts having been unnecessary. On the other hand, if, ultimately, a Hawai'i Electric Light rate case is still necessary or desirable, Hawai'i Electric Light would still be able to file a 2016 test year rate case before the end of 2016. Thus, Hawai'i Electric Light contends that granting it an extension until the end of 2016 to file its rate case would be reasonable in that it would allow time for the Proposed Rate Case Moratorium to be considered, while still preserving the option for Hawai'i Electric Light to file a 2016 test year rate case as currently required.

Hawai'i Electric Light understands and agrees that, if the Commission were to approve this present motion, it would in no way be considered any indication whatsoever of the Commission's views on any issue in the Merger Docket, including on the Proposed Rate Case Moratorium.

Separately, but in addition, allowing Hawai'i Electric Light an extension to file may result in a more efficient and effective rate case proceeding. Hawai'i Electric Light's rate case filing will be based on factors such as the operations and maintenance expenses and investments in plant and equipment estimated for the 2016 test year to maintain the electric grid and system reliability, and to plan for and acquire additional renewable energy resources. However, the progress in and outcome of the following pending proceedings would likely have a significant impact on Hawai'i Electric Light's 2016 projections, revenue requirements and test year filing: Hawai'i Electric Light's Power Supply Improvement Plan ("PSIP"), currently under review in Docket No. 2014-0183, the Companies' Distributed Generation Interconnection Plan ("DGIP"), currently under review in Docket No. 2014-0192, the Companies' Integrated Demand Response Portfolio Plan ("IDRPP"), currently under review in Docket No. 2007-0341, and the investigation into the Companies existing "decoupling mechanism" is continuing in Docket

No. 2013-0141. The Companies have also embarked on a series of initiatives to transform how the Companies' operate. As the Commission recently observed, "the HECO Companies are in the midst of addressing a series of complex and challenging issues that will determine how they will develop and implement a sustainable and progressive business model that results in quantifiable benefits for ratepayers and the State's citizens and economy."⁵

It is anticipated that the issues in a number of these major dockets involving the future direction of the Hawaiian Electric Companies will be addressed and perhaps even resolved during the period of requested extension. In the meantime, the impacts of these dockets and the Companies' transformational initiatives are not fully known, and a rate case filed by the end of 2015 would only include costs to the extent they can be identified and estimated at the middle of this year when the projections and budgets are being prepared. Allowing Hawai'i Electric Light to use a 2016 test year period for its rate case application filed by December 30, 2016 would allow for more certainty in the Company's financial requirements for 2016. Thus, using a 2016 test year will facilitate presentation and analysis of the test year estimates, and should help avoid unnecessary controversy and potential delay in concluding this case. *See* Affidavit of Joseph P. Viola ("Viola Affidavit") at 3-4, which is attached hereto.

B. Request for Waiver

Hawai'i Electric Light's request will require a waiver of HAR § 6-61-87(4) in order to file a general rate case on or before December 30, 2016 using a 2016 calendar year test period. HAR § 6-61-87(4) states the following:

⁵ Order No. 32695 *Initiating Proceedings; Establishing Standards of Review, Initial Statement of Issues, and Initial Procedures; and Addressing Intervention Requests*, issued on March 2, 2015 in Docket No. 2015-0022 ("Change of Control Application Order") at 7.

...The test year shall be a forward test year, determined as follows:

- (A) If an application is filed within the first six months of any year, the test year shall be from July 1 of the same year through June 30 of the following year; or
- (B) If an application is filed within the last six months of any year, the test year shall be from January 1 through December 31 of the following year;...

Without a waiver of this section, the test year for an application filed by December 30, 2016 would be from January 1 through December 31 of 2017. HAR § 6-61-92 enables the Commission to modify any of the requirements of Subchapter 8 of Title 6, Chapter 61 of the HAR if the requirements would “impose a financial hardship on the applicant or be unjust or unreasonable.”

If the Commission allows Hawai‘i Electric Light an extension of the date to file its rate case, Hawai‘i Electric Light intends to file its general rate case by December 30, 2016 using a 2016 calendar year test period. Hawai‘i Electric Light respectfully submits that the requested waiver is warranted because not allowing the use of a 2016 test year under the present unique circumstances would impose a financial hardship and be unjust and unreasonable. See Viola Affidavit at 4. The use of a 2016 test year is justified for the following reasons:

As noted above, Hawai‘i Electric Light’s last general rate case used a 2013 test year (which the Company withdrew subject to the Stipulated Settlement and the Commission approved the suspension of⁶ and then closed the proceeding⁷), and the next general rate case in the three-year general rate case cycle should use a 2016 test year. Normally, a general rate case using a calendar 2016 test year would be filed in the second half of 2015.

⁶ Order No. 31097 at 7, issued March 8, 2013 in Docket No. 2012-0099.

⁷ Order No. 31133 at 3, issued March 27, 2013 in Docket No. 2012-0099.

However, as maintained above, in terms of (a) potentially avoiding an unnecessary expenditure of efforts and resources, and (b) potentially resulting in a more efficient and effective proceeding, Hawai'i Electric Light submits that there is reasonable justification to grant an extension to file its next rate case before the end of 2016.

The Commission has previously granted motions for waiver of the test year requirement in HAR § 6-61-87(4). For example, as mentioned above, Order No. 31965 in Docket No. 2013-0373 approved Hawaiian Electric's motion to waive the requirement to utilize a 2014-2015 split test year, and authorized the use of a 2014 calendar test year on the condition that Hawaiian Electric file its application by June 27, 2014. Also, Order No. 23188 in Docket No. 2006-0387 approved Maui Electric's Motion for Approval of Test Period Waiver for a rate increase application to be filed on or after January 1, 2007 (but before June 30, 2007) with a 2007 calendar test year, and Order No. 22212 in Docket No. 05-0315 approved Hawai'i Electric Light's Motion for Approval of Test Period Waiver for a rate increase application to be filed on or after March 15, 2006 (but before June 30, 2006) with a 2006 calendar test period.⁸ Similarly, Order No. 13656 in Docket No. 94-0298 approved GTE Hawaiian Telephone Company Incorporated's ("GTE") motion to waive the test year requirements in HAR § 6-61-87(4) and approved a calendar year 1995 test year for a rate increase application intended to be filed in the first six months of 1995, and in Order No. 12161 in Docket No. 7579, the Commission approved GTE's use of a 1993 calendar test year for a rate increase application which was to be filed during the first six months of 1993.

⁸ Maui Electric Company, Limited filed a rate increase application for the 2007 calendar test year on February 23, 2007, and Hawai'i Electric Light Company, Inc. filed a rate increase application for the 2006 calendar test year on May 5, 2006.

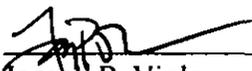
V.

Pursuant to HAR § 6-61-41(b), the factual matters referred to in this motion are supported by the Affidavit of Joseph P. Viola, which is attached hereto and made a part hereof.

WHEREFORE, Hawai'i Electric Light respectfully requests the Commission to approve this Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver and allow Hawai'i Electric Light to file a rate case application by December 30, 2016, utilizing a 2016 calendar year test period.

DATED: Honolulu, Hawai'i, June 17, 2015.

HAWAI'I ELECTRIC LIGHT COMPANY, INC.

By  _____
Joseph P. Viola
Vice President

AFFIDAVIT OF JOSEPH P. VIOLA

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

Joseph P. Viola, being first duly sworn on oath, deposes and says that:

1. He is the Vice President of Hawai'i Electric Light Company, Inc. ("Hawai'i Electric Light").
2. This affidavit is made in support of Hawai'i Electric Light's Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver.
3. The Commission implemented a mandatory, three-year general rate case cycle (unless otherwise ordered by the Commission) in its Final Decoupling Order issued August 31, 2010, commencing with Hawaiian Electric's 2011 test year rate case.¹ Consistent with the Final Decoupling Order, Hawai'i Electric Light's last general rate case used a 2013 test year (and was subsequently withdrawn pursuant to the Stipulated Settlement Agreement filed and approved in Docket No. 2008-0083),² and its next general rate case in the three-year general rate case cycle should use a 2016 test year.
4. Normally, a general rate case using a calendar 2016 test year would be filed in the second half of 2015. However, because of the unique circumstances hereinafter set forth, Hawai'i Electric Light requests an extension of the date by which it must file its rate case, from 2015 to December 30, 2016.

¹ Final Decision and Order issued August 31, 2010 in Docket No. 2008-0274 (Proceeding to Investigate Implementing a Decoupling Mechanism), at 129.

² The *Stipulated Settlement Agreement between the Hawaiian Electric Companies and the Division of Consumer Advocacy regarding Certain Regulatory Matters* was filed January 28, 2013, in Docket No. 2008-0083, and was approved, with modifications, by Order No. 31126, issued March 19, 2013.

5. On January 29, 2015, the Hawaiian Electric Companies³ and NextEra Energy, Inc. ("NextEra Energy") filed an application in Docket No. 2015-0222 requesting Commission approval of a change of control of the Hawaiian Electric Companies from Hawaiian Electric Industries, Inc. ("HEI") to Hawaiian Electric Holdings, a wholly owned subsidiary of NextEra Energy ("Change of Control Application").⁴

6. In that Change of Control Application, NextEra Energy committed that, subject to certain qualifications, for at least four years following the closing of the proposed change of control, the Hawaiian Electric Companies will not submit any applications seeking a general base rate increase ("Proposed Rate Case Moratorium"). *See* Change of Control Application at 34-37.

7. Hawai'i Electric Light does not presume or intend to suggest any expectation on how and when the Commission will rule on the Change of Control Application or the Proposed Rate Case Moratorium. However, because it could avoid potentially unnecessary expenditure of valuable time and resources for all concerned, Hawai'i Electric Light respectfully submits that it is reasonable to defer its filing of a 2016 test year rate case until such time as a decision and order on the Change of Control Application in the Merger Docket may be issued, in that it would allow time for the Proposed Rate Case Moratorium to be considered, while still preserving the option for Hawai'i Electric Light to file a 2016 test year rate case as currently required, if necessary or desirable.

8. Hawai'i Electric Light understands and agrees that, if the Commission were to approve this present motion, it would in no way be considered any indication whatsoever of the Commission's views on any issue in the Merger Docket, including on the Proposed Rate Case Moratorium.

³ The "Hawaiian Electric Companies" are Hawaiian Electric, Maui Electric Company, Limited ("Maui Electric"), and Hawai'i Electric Light.

⁴ Docket No. 2015-0022 will be referred to hereinafter as the "Merger Docket."

9. Separately, but in addition, allowing Hawai'i Electric Light an extension to file may result in a more efficient and effective rate case proceeding. Hawai'i Electric Light's rate case filing will be based on factors such as the operations and maintenance expenses and investments in plant and equipment estimated for the 2016 test year to maintain the electric grid and system reliability, and to plan for and acquire additional renewable energy resources.

10. However, the progress in and outcome of the following pending proceedings would likely have a significant impact on Hawai'i Electric Light's 2016 projections, revenue requirements and test year filing: Hawai'i Electric Light's Power Supply Improvement Plan ("PSIP"), currently under review in Docket No. 2014-0183, the Companies' Distributed Generation Interconnection Plan ("DGIP"), currently under review in Docket No. 2014-0192, the Companies' Integrated Demand Response Portfolio Plan ("IDRPP"), currently under review in Docket No. 2007-0341, and the investigation into the Companies existing "decoupling mechanism" which is continuing in Docket No. 2013-0141. The Companies have also embarked on a series of initiatives to transform how the Companies operate.

11. It is anticipated that the issues in a number of these major dockets involving the future direction of the Hawaiian Electric Companies will be addressed and perhaps even resolved during the period of requested extension. In the meantime, the impacts of these dockets and the Companies' transformational initiatives are not fully known, and a rate case filed by the end of 2015 would only include costs to the extent they can be identified and estimated at the middle of this year when the projections and budgets are being prepared.

12. Allowing Hawai'i Electric Light to use a 2016 test year period for its rate case application filed by December 30, 2016 would allow for more certainty in the Company's financial requirements for 2016. Thus, using a 2016 test year will facilitate presentation and

analysis of the test year estimates, and should help avoid unnecessary controversy and potential delay in concluding this case.

13. If the Commission allows Hawai'i Electric Light an extension of the date to file its rate case, Hawai'i Electric Light intends to file its general rate case by December 30, 2016 using a 2016 calendar year test period. For the reasons set forth above, Hawai'i Electric Light respectfully submits that not allowing the use of a 2016 test year under the present unique circumstances would impose a financial hardship and be unjust and unreasonable.

14. In terms of (a) potentially avoiding an unnecessary expenditure of efforts and resources, and (b) potentially resulting in a more efficient and effective proceeding, Hawai'i Electric Light respectfully submits that there is reasonable justification to grant an extension to file its next rate case before the end of 2016, using a 2016 calendar year test period in support of said rate case.

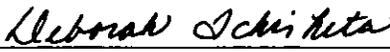
Further Affiant Sayeth Naught.



Joseph P. Viola

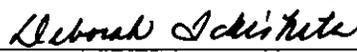


Subscribed and sworn to before me
this 17th day of June 2015.



DEBORAH ICHISHITA

Notary Public, State of Hawaii
My Commission expires: July 18, 2016

STATE OF HAWAII NOTARY CERTIFICATION	
Doc. Date: <u>6/17/2015</u>	# of pages <u>17</u>
Notary Name: DEBORAH ICHISHITA First Circuit	
Doc. Description: <u>Notice of Intent, Motion,</u> <u>Affidavit of Joseph P. Viola</u>	
 _____ Notary Signature	<u>6/17/15</u> _____ Date



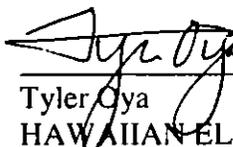
CERTIFICATE OF SERVICE

I hereby certify that I served copies of the foregoing Hawai'i Electric Light Company, Inc. Notice of Intent, Motion to Extend Date to File Rate Case and for Approval of Test Period Waiver, Affidavit of Joseph P. Viola and this Certificate of Service, by hand delivery or mailing a copy by United States mail, postage prepaid, to the following:

Jeffrey T. Ono (2 copies via hand delivery)
Executive Director
Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
335 Merchant Street, Room 326
Honolulu, Hawai'i 96813

The Honorable William P. Kenoi (1 copy via United States mail)
Mayor
County of Hawai'i
25 Aupuni Street
Hilo, Hawai'i 96720

DATED: Honolulu, Hawai'i, June 17, 2015.



Tyler Oya
HAWAIIAN ELECTRIC COMPANY, INC.
Regulatory Affairs Department