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To hawaii.puc@hawaii.gov,

cc

bcc

Subject Public Comment - Docket No. 2014-0183 - PSIPs and Docket
No. 2014-0192 DGIP - Robert A. Gould

Dear PUC,

I have commented on this issue before, but new information has come to my attention, so I ask that you accept this late comment. I assume you are still in discussions with HECO and they are being allowed to present their case, and if that is so, the public should be allowed to do so also.

I urge you to not accept HECO's proposed rate structure, and I direct your attention to the situation in the San Francisco Bay Area. Having done proper due diligence, you should already be aware of the situation there, but in case you missed it, I suggest a similar rate structure for Net Metering be applied here in Hawaii.

Here are the salient points of the PG&E plan that HECO should follow.

1. Net power generated by net meter customers is accepted at the retail rate. (PG&E calculates this based on kWh rather than dollars.)
2. When excess power is generated by the customer it is banked for the 12 month rolling True Up period, and is credited back to the customer in kWh, adjusting the customers' billing accordingly.

So far this is essentially the same as what we currently have in Hawaii. Next come the important differences that should be applied to HECO.

3. All banked power left over at the True Up period is **PURCHASED FROM THE CUSTOMER** at approximately half of the retail kWh rate. So unlike the current situation in Hawaii, HECO would not be able to essentially walk away with the customer's money as expressed in excess produced power (in our case this year it will amount to about \$1,100, and in a past year was over \$700), but HECO would have to pay the customer at half rates for that excess power in cash.

4. There is a base connection rate charged by PG&E just as in the case of HECO, but unlike HECO's current \$17 per month or their requested \$55 a month, PG&E's base connection rate is \$4.73!

Generation - \$0.84

Distribution - \$3.66

Public Purpose Programs - \$0.22

Nuclear Power Decommissioning - \$0.01

HECO's PSIP plan is not about reducing costs to customers; it is about maximizing their profit and attempting to strangle residential photovoltaic production. HECO needs

to be brought to heel and informed that their attempts to control Hawaii's move to renewable power as a profit center will not stand. The only change that should be made to the current rate structure for Net Metering is to require HECO to refund all banked value to the customer at the end of the rolling 12 month reset instead of accepting that extra power at no benefit to the customer.

Finally, I suspect NextEra's hand in HECO's rate filings, and that should give you an idea of what to expect when and if NextEra takes over.

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