

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)

THE STATE OF HAWAII)
DEPARTMENT OF BUSINESS,)
ECONOMIC DEVELOPMENT,)
AND TOURISM)

DOCKET NO. 2014-0135

For an Order Approving the Green)
Infrastructure Loan Program)

ORDER NO. 35415

CONDITIONALLY APPROVING THE ESTABLISHMENT AND
IMPLEMENTATION OF AN ON-BILL REPAYMENT MECHANISM

PUBLIC UTILITIES
COMMISSION

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FILED

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CONDITIONALLY APPROVING THE ESTABLISHMENT AND
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By this Order, the State of Hawaii Public Utilities Commission ("commission") approves the on-bill repayment mechanism, jointly filed by the Hawaii Green Infrastructure Authority ("HGIA" or "Authority") and the Hawaiian Electric Companies¹ (collectively, the "Joint Filers"), filed on February 28, 2018, subject to the conditions set forth in this Order.

¹Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc., and Maui Electric Company, Limited are collectively referred to as the "Hawaiian Electric Companies" or the "HECO Companies."

I.

BACKGROUND

A.

On Bill Financing

On June 3, 2014, the commission opened an investigation into on-bill financing.² In opening the investigation, the commission stated:

Hawaii Revised Statutes ("HRS") § 269-125[] directs the commission to investigate an on-bill financing program for electric utility customers to purchase or otherwise acquire a renewable energy system or energy-efficient device through an assessment on the customer's electricity bill.³

The commission implemented HRS § 269-125 by way of the Hawaii Energy Bill Saver Program Manual ("HEB\$ Program Manual").⁴ After receiving significant stakeholder input, the commission designed the HEB\$ Program Manual to provide the foundational principles for any on-bill financing and recovery method.

On May 20, 2016, the commission issued Order No. 33715 in Docket No. 2014-0129, suspending the establishment of an on-bill

²See In re Public Util. Comm'n, Docket No. 2014-0129, Order No. 32114, filed on June 3, 2014 ("Order No. 32114").

³Order No. 32114 at 1-2.

⁴The commission filed the HEB\$ Program Manual in Docket No. 2014-0129 on January 9, 2015. The history of HEB\$, and the adoption of the HEB\$ Program Manual is set forth, in detail, in Order No. 32778, filed in Docket No. 2014-0129 on April 15, 2015.

financing program because of limited market interest from entities qualified to implement the program, among other reasons.⁵ The commission directed the HECO Companies to collaborate with HGIA "to design and implement an on-bill repayment mechanism for the exclusive use of HGIA."⁶ The commission issued this directive to ensure that the Green Energy Market Securitization ("GEMS") Program⁷ had "every opportunity to deploy its bond proceeds and secure loan repayments that will be used to offset the reduction in public benefits funds collections instituted as a result of the GEMS Program and associated green infrastructure fee."⁸ The commission further directed that "[p]rior to implementation, the HECO Companies and HGIA shall submit their on-bill repayment mechanism design to the commission for approval."⁹

Pursuant to the Suspension Order, HGIA and the HECO Companies engaged in conference calls and meetings to develop an on-bill repayment mechanism for GEMS loans.

⁵See In re Public Util. Comm'n, Docket No. 2014-0129, Order No. 33715, filed on May 20, 2016 ("Suspension Order"), at 15-17.

⁶Suspension Order at 17.

⁷The GEMS Program is described fully in In re State of Haw. Dep't. of Bus., Econ. Dev., and Tourism, Docket No. 2014-0135, Order No. 32318, filed on September 30, 2014 ("Program Order").

⁸Suspension Order at 17.

⁹Suspension Order at 17.

On November 24, 2017, the HECO Companies provided the commission a status update on their discussions with HGIA to develop an on-bill repayment mechanism, and sought the commission's guidance with respect to certain issues.¹⁰

On January 5, 2018, the commission issued Order No. 35185 in the instant docket providing the requested guidance regarding the on-bill repayment mechanism.¹¹ Specifically, the commission found and concluded:

1. In developing the GEM\$ program, the Companies shall follow their standard disconnection process, as set forth in the [HEB\$] Program Manual[;]
2. GEM\$ loan repayments shall have senior status over payment for electricity usage[;]
3. The commission will not insert itself into any putative negotiations between the Companies and Concord, and the absence of a coordinating agreement between the Companies and Concord shall not delay the implementation of the GEM\$ program[; and]
4. The Companies shall not recover costs associated with the GEM\$ programs directly from HGIA. Instead, pursuant to Act 211, the Companies may seek to recover these costs as a part of their revenue requirement, in a rate case.¹²

¹⁰"Docket No. 2014-0135 For an Order Approving the Green Infrastructure Loan Program Status Update and Request for Guidance on the On-Bill Repayment Mechanism," filed on November 24, 2017.

¹¹See In re State of Haw. Dep't. of Bus., Econ. Dev., and Tourism, Docket No. 2014-0135, Order No. 35185, filed on January 5, 2018 ("Guidance Order").

¹²See Guidance Order at 11. Act 211 refers to 2013 Haw. Sess. Laws Act 211.

On February 28, 2018, the Joint Filers submitted their Joint Application for approval of an on-bill repayment mechanism.¹³

On March 29, 2018, the Department of Commerce and Consumer Affairs, Division of Consumer Advocacy ("Consumer Advocate") filed its comments regarding the Joint Application.¹⁴

On April 13, 2018, the Joint Filers responded to the Consumer Advocate's Comments.¹⁵

B.

Joint Application

By their Joint Application, the Joint Filers seek certain approvals from the commission, and clarification of the Guidance Order. Specifically, the Joint Filers seek commission approval of: (1) the GEM\$ On-Bill Program Manual, attached to the Joint Application as Exhibit A; (2) the Residential GEM\$ On-Bill

¹³"Hawaii Green Infrastructure Authority's and Hawaiian Electric Companies' Joint Filing for Approval of the Green Energy Money Saver on Bill Program; and Certificate of Service," ("Joint Application") filed on February 28, 2018.

¹⁴"Division of Consumer Advocacy's Comments Regarding Hawaii Green Infrastructure Authority's and Hawaiian Electric Companies' Joint Filing for Approval of the Green Energy Money Saver On Bill Program," ("Consumer Advocate's Comments") filed on March 29, 2018.

¹⁵"Hawaii Green Infrastructure Authority's and The Hawaiian Electric Companies' Responses to the Division of Consumer Advocacy's Comments Regarding the Joint Filing for Approval of the Green Energy Money Saver On-Bill Program," ("Joint Response") filed on April 13, 2018.

Loan Product, attached to the Joint Application as Exhibit B; (3) the Commercial GEM\$ On-Bill Loan Product, attached to the Joint Application as Exhibit C; and (4) the addition of Energy Star refrigerators as eligible technology under the GEM\$ Program.¹⁶ In addition, the Joint Filers ask the commission to clarify whether the Guidance Order provides the HECO Companies "explicit approval to defer incremental costs incurred in implementing the GEM\$ Program in between rate case periods" ¹⁷

C.

Consumer Advocate's Comments

The Consumer Advocate states that it supports on-bill financing to reduce customer electricity bills, facilitate the financing of cost-effective renewable energy and energy efficiency investments, and contribute to the State's energy goals.¹⁸ The Consumer Advocate further states that the Joint Filers "appear to have substantially complied with the [c]ommission's Order Nos. 33715 and 35185."¹⁹ The Consumer Advocate recommends certain changes to the proposed GEM\$ On-Bill Program Manual to

¹⁶Joint Application at 8, 15, and Exhibit B n.2.

¹⁷Joint Application at 15.

¹⁸Consumer Advocate's Comments at 5.

¹⁹Consumer Advocate's Comments at 5-6.

"reduce customer confusion, reduce customer risk of default and disconnection of service, and promote greater transparency regarding participants' rights and obligations and GEM\$ Program progress."²⁰ Finally, the Consumer Advocate objects to the Joint Filers' request for clarification of the Guidance Order with respect to deferral accounting authority.²¹

With respect to the proposed GEM\$ On-Bill Program Manual, the Consumer Advocate recommends that: (1) "[r]eferences to 'Energy Improvements', 'GEMS-approved technologies' and/or 'GEM\$-approved technologies' should be defined as any renewable energy measure or energy efficiency and conservation system that has been approved by the [c]ommission for GEMS financing through the Program Notification and Program Modification Process, as described in Decision and Order No. 32318, at pages 83-86";²² (2) to be eligible for on-bill financing, any project should be expected to result in an immediate and consistent estimated bill savings of at least ten percent;²³ (3) Exhibits B and C to the GEM\$ Program Manual, and all references thereto be deleted; and (4) the commission should not approve the Authority's request for solar water heating and/or

²⁰Consumer Advocate's Comments at 6.

²¹Consumer Advocate's Comments at 6.

²²Consumer Advocate's Comments at 16 (citing the Program Order).

²³Consumer Advocate's Comments at 16.

Energy Star refrigerators outside of the Program Notification and Program Modification process.²⁴

The Consumer Advocate also offers more general suggestions, regarding the GEM\$ Program Manual. First, the Consumer Advocate recommends that the Authority consider using a "short, targeted survey" to answer questions such as how customers became aware of GEM\$ and the timing and length of customers' decision process.²⁵ The Consumer Advocate argues that "one or two short, targeted questions could be asked as a pre-condition to use on-bill financing" in order to "learn more about reaching underserved and hard-to-reach customers" ²⁶

Second, the Consumer Advocate argues that "greater transparency is necessary to ensure that all participants understand both their rights and responsibilities" and how obligations and charges are determined.²⁷ The Consumer Advocate recommends that the Joint Filers explain why the forms that provided this information in the HEB\$ Program Manual were omitted from the GEM\$ Program Manual, and "what forms or mechanisms are currently in place to ensure that participants understand their rights and

²⁴Consumer Advocate's Comments at 16-17.

²⁵Consumer Advocate's Comments at 17.

²⁶Consumer Advocate's Comments at 18.

²⁷Consumer Advocate's Comments at 19.

responsibilities, including the amount they will be obligated to pay back and the term of repayment."²⁸ To further promote customer understanding, the Consumer Advocate recommends that the GEM\$ Program Manual include details that explain "how various inputs will be used to calculate the on-bill obligation and the program charge for certain property types."²⁹ The Consumer Advocate also recommends that the Authority provide this information in other ways, such as a website tool or calculator.³⁰

Third, the Consumer Advocate recommends that HGIA add an appendix to the GEM\$ Program Manual that specifies the data it will be reporting to the commission, similar to Appendix C of the HEB\$ Program Manual, including the actual bill savings associated with each supported technology.³¹ The Consumer Advocate concedes that HGIA does not have access to actual ratepayer data.³² Nevertheless, the Consumer Advocate argues that "HGIA should work with the Hawaiian Electric Companies to provide at least some evidence regarding the actual bill impacts to GEM\$ participants."³³

²⁸Consumer Advocate's Comments at 19.

²⁹Consumer Advocate's Comments at 20.

³⁰Consumer Advocate's Comments at 20.

³¹Consumer Advocate's Comments at 21-22.

³²Consumer Advocate's Comments at 22.

³³Consumer Advocate's Comments at 22.

Fourth, the Consumer Advocate recommends particular language be added as part of the Authorization for Release of Information Forms that are attached as Appendix A and B to the GEM\$ Program Manual.³⁴ Specifically, the Consumer Advocate recommends the following language: "Aggregated data, which summarizes data from various participants' accounts, may be made available to help assess program effectiveness."³⁵

Finally, the Consumer Advocate argues that the Guidance Order did not grant the HECO Companies deferral accounting authority, and to the extent that the HECO Companies are requesting reconsideration of the Guidance Order to grant such authority, said request should be denied.³⁶

D.

Joint Response

The Joint Filers responded to the Consumer Advocate's Comments regarding: (1) requiring HGIA to submit a Program Modification for approval to finance residential energy efficiency measures; (2) limiting eligibility to projects that are expected to result in immediate and consistent savings of at least

³⁴Consumer Advocate's Comments at 22.

³⁵Consumer Advocate's Comments at 22.

³⁶Consumer Advocate's Comments at 24.

ten percent; (3) a short targeted survey for residential energy efficiency customers; (4) further clarification on agreements and forms; (5) a calculator for on-bill obligations; (6) specific data reporting metrics to be used in HGIA's Quarterly Reports; (7) evidence to demonstrate bill impacts; and (8) cost deferral.³⁷

1.

Program Modification

The Joint Filers argue that a Program Modification for residential energy efficiency is not necessary because "the [c]ommission already has the requisite information it needs to determine if residential EE, and more specifically, solar thermal water heaters, solar PV water heaters and heat pump water heaters should be included in the GEM\$ Program."³⁸ The Joint Filers further argue that the public benefits fee administrator has provided the commission with ample data describing the benefits of various residential energy efficiency products, and further demonstrating that high efficiency water heating has been a proven technology for over twenty two years.³⁹ The Joint Filers rescind their request to make Energy Star refrigerators eligible for the

³⁷Joint Response at 2.

³⁸Joint Response at 3.

³⁹Joint Response at 3-5.

GEM\$ On-Bill Program, "thereby limiting the initial Eligible Technologies under the GEM\$ Residential On-Bill Loan Product to solar [photovoltaic] systems, solar thermal water heaters, and/or solar [photovoltaic] water heaters, heat pump water heaters, advanced inverters, smart modules, monitoring devices, other technologies that support solar system interconnection."⁴⁰ Finally, the Joint Filers state that if the commission determines the Authority must submit a Program Modification for residential energy efficiency technologies, then in the interest of time, the Authority requests that the commission "approve the GEM\$ On-Bill Program without the ability to finance residential water heating technologies, to allow the Program's implementation and launch to move forward" and so as not to "delay the GEM\$ Program's launch to the 3rd or 4th quarter of this year."⁴¹

2.

Remaining Comments

The Joint Filers respond to the Consumer Advocate's remaining comments, as follows. First, the Joint Filers agree that "the projects eligible for on-bill financing should be those

⁴⁰Joint Response at 5.

⁴¹Joint Response at 5.

expected to result in an immediate and consistent estimated bill savings of at least ten percent."⁴²

Second, the Joint Filers say that "HGIA will include a short, targeted survey for residential energy efficiency customers during the application process, and is in the process of collaborating with Hawaii Energy to develop the survey questions."⁴³

Third, the Joint Filers explain that, in order to avoid unnecessary attorney fees, they are waiting for commission approval of the GEM\$ On-Bill Repayment Program before they instruct their attorneys to draft certain documents.⁴⁴ The Joint Filers further explain that when these documents are drafted, they will "meet all consumer finance regulations" and clearly communicate the "explicit rights, responsibilities and expectations" of all relevant parties, and "make clear the costs, program charges, term of the program charge, etc."⁴⁵

Fourth, the Joint Filers state that HGIA will be working with its information technology contractor to include a loan payment calculator on its website.⁴⁶

⁴²Joint Response at 5.

⁴³Joint Response at 6.

⁴⁴Joint Response at 6.

⁴⁵Joint Response at 6.

⁴⁶Joint Response at 6-7.

Fifth, the Joint Filers provide examples of program metrics that HGIA will add to its Quarterly Reports, including application submissions, approvals, program metrics, marketing, outreach, and customer service reporting.⁴⁷

Sixth, with respect to bill impacts, the Joint Filers argue that "it is unclear whether requiring HGIA to track and report participants' actual bill savings would provide useful information."⁴⁸ The Joint Filers request that they instead be allowed to rely on existing metrics, such as the public benefits fee administrator's Technical Resource Manual and/or other industry experts, to estimate the post-installation bill savings.⁴⁹

Finally, with respect to cost deferral, the Joint Filers reiterate their request for clarification of the Guidance Order, and provide additional reasons to explain why their request regarding cost deferral is warranted.⁵⁰

⁴⁷Joint Response at 7-10.

⁴⁸Joint Response at 13.

⁴⁹Joint Response at 12.

⁵⁰Joint Response at 13-15.

II.

DISCUSSION

A.

Compliance with the Guidance Order

The commission observes that the Joint Filers complied with the directives contained in the Guidance Order. Specifically, the proposed GEM\$ Program Manual follows the commission-approved HEB\$ Program Manual with respect to disconnection and bill repayment order. In order to keep the GEM\$ On-Bill Repayment Program consistent with the GEMS Program, the commission will require the Joint Filers to submit a final version of the GEM\$ Program manual that complies with the following conditions.

B.

Conditions on Approval

1.

Eligible Technology

As currently proposed, the GEM\$ Program Manual defines eligible technologies that are not otherwise eligible for the GEMS Program - including residential energy efficiency technologies as solar water heaters, solar thermal water heaters, heat pump water heaters, and Energy Star refrigerators.⁵¹ The Consumer Advocate is

⁵¹See Joint Application, Exhibits B and C.

correct that having two separate definitions for eligible technology creates unnecessary confusion. To avoid this confusion, the final GEM\$ Program Manual shall define energy improvements eligible for the GEM\$ On-Bill Repayment Program as products that are approved to receive GEMS financing through the Program Notification and/or Program Modification process. In the future, if HGIA wishes to add eligible technologies to the GEM\$ program, it should do so with via the Program Notification or Program Modification process, as appropriate, and any newly added technologies will, by definition, become eligible for the GEM\$ On-Bill Repayment Program.

Nevertheless, the Joint Filers are correct that the filing of a Program Modification for residential energy efficiency products that are well understood would needlessly delay the implementation of the GEM\$ On-Bill Repayment Program. Moreover, the commission already approved most of these technologies in the HEB\$ Program Manual, Appendix D.⁵² Therefore, in this instance, the commission finds that a Program Modification is not necessary.

In the Program Order, the commission reserved the right to "amend or waive the GEMS Program oversight and governance procedures as modified and adopted herein, where it is determined by the commission to be necessary to ensure just, speedy,

⁵²See HEB\$ Program Manual, Appendix D, at D-1.

or inexpensive resolution of matters in this proceeding.”⁵³ Because requiring a Program Modification for the proposed residential energy efficiency measures would be duplicative of past efforts, and would therefore cause the Authority to needlessly expend time and money, the commission finds it necessary to waive the Program Modification requirement in this instance. This waiver is limited to the present set of facts and circumstances. A different set of facts and circumstances could compel a different result. The commission reminds the Joint Filers that the Program Notification and Program Modification processes remain in full effect.

2.

Areas of Agreement

The Consumer Advocate recommends that HGIA provide additional clarification and information to customers and the commission. First, the Consumer Advocate argues that to be eligible for on-bill financing, any project should be expected to result in an immediate and consistent estimated bill savings of at least ten percent.⁵⁴ The Joint Filers agree.⁵⁵ Second, the Consumer Advocate

⁵³Program Order at 86.

⁵⁴Consumer Advocate’s Comments at 16.

⁵⁵Joint Response at 5.

recommends the Authority consider using a "short, targeted survey" that is used "to learn more about reaching underserved and hard-to-reach customers."⁵⁶ The Joint Filers agree to this as well.⁵⁷ Finally, the Consumer Advocate recommends adding language stating "Aggregated data, which summarizes data from various participants' accounts, may be available to help assess program effectiveness[,] " as part of the Authorization for Release of Information Forms that are attached as Appendices A and B to the GEM\$ Program Manual.⁵⁸ The Joint Filers appear to agree in principle, and propose to do this once the GEM\$ Program Manual is approved.⁵⁹

It appears that the Joint Filers and the Consumer Advocate are largely in agreement on these proposed additions to the GEM\$ Program Manual. These proposed additions will allow the commission, the Consumer Advocate, and customers to better understand and assess the GEM\$ Program. Therefore, the commission directs the Joint Applicants to file an updated GEM\$ Program Manual that reflects these additions within 120 days of this Order.

⁵⁶Consumer Advocate's Comments at 18.

⁵⁷Joint Response at 6.

⁵⁸Consumer Advocate's Comments at 22.

⁵⁹Joint Response at 6.

C.

Additional Matters

1.

Areas of Partial Agreement

The Consumer Advocate recommends a new section of the GEM\$ Program Manual that "explicitly details how the various inputs will be used to calculate the on-bill obligation and program charge for certain property types" in order to "help make more transparent how these various factors affect the program charge (e.g., via website tool or calculator)."⁶⁰ The Joint Filers respond that HGIA will be working with its information technology contractor to include a loan payment calculator on its website.⁶¹ The Joint Filers also state that applicants will also be able to calculate their on bill obligation, via clearly articulated manual input.⁶² The commission finds the Joint Filer's response to be sufficient.

The Consumer Advocate recommends that HGIA add an appendix to the GEM\$ Program Manual that specifies the data it will be reporting to the commission, similar to Appendix C of the HEB\$ Program Manual, including the actual bill savings associated

⁶⁰Consumer Advocate's Comments at 20.

⁶¹Joint Response at 6-7.

⁶²Joint Response at 7.

with each supported technology.⁶³ The Joint Filers provide a detailed list of data that HGIA will be reporting.⁶⁴ With respect to bill savings, the Joint Filers argue that "it is unclear whether requiring HGIA to track and report participants' actual bill savings would provide useful information."⁶⁵ The Joint Filers request that they be allowed to rely on existing metrics, such as the public benefits fee administrator's Technical Resource Manual and/or other industry experts, to estimate the post-installation bill savings.⁶⁶ The commission finds the Joint Filer's responses to be sufficient, both in terms of the metrics they plan to report, and their reliance on existing metrics to estimate post-installation bill savings.

2.

Clarification Regarding Cost Recovery

The HECO Companies seek clarification from the commission whether the Guidance Order "allows the [HECO] Companies to defer costs incurred between rate case test years for GEM\$ Program development."⁶⁷ With respect to cost recovery,

⁶³Consumer Advocate's Comments at 21-22.

⁶⁴Joint Response at 7-10.

⁶⁵Joint Response at 13.

⁶⁶Joint Response at 12.

⁶⁷Joint Application at 12.

the Guidance Order states: "[t]he Companies shall not recover costs associated with the GEM\$ programs directly from HGIA. Instead, pursuant to Act 211, the Companies may seek to recover these costs as a part of their revenue requirement, in a rate case."⁶⁸

The Guidance Order does not explicitly allow the HECO Companies to defer incremental costs incurred in implementing the GEM\$ Program in between rate case periods. Insofar as the Joint Application moves for reconsideration of the Guidance Order, such motion is denied because it is not timely. Hawaii Administrative Rules ("HAR") § 6-61-137 requires that a motion seeking any change in a commission order be filed within ten (10) days after the decision or order has been served upon a party. The commission issued and served the Guidance Order upon the HECO Companies on January 5, 2018. Pursuant to HAR §§ 6-61-21(e), 6-61-22, and 6-61-137, a motion for reconsideration would have been timely if filed on or before January 17, 2018. The Joint Filers filed the Joint Application on February 28, 2018, well beyond the deadline for reconsideration. Therefore, to the extent the Joint Application moves for reconsideration of the Guidance Order, said motion is denied.

⁶⁸Guidance Order at 11.

D.

Findings and Conclusions

For the foregoing reasons, the commission finds and concludes as follows.

1. The GEM\$ On-Bill Program Manual, attached to the Joint Application as Exhibit A, is approved, subject to the conditions set forth in this order.

2. The GEM\$ Residential On-Bill Loan Product, attached to the Joint Application as Exhibit B, is approved, excluding Energy Star refrigerators, and the technology therein shall be considered approved to receive GEMS financing.

3. The GEM\$ Commercial On-Bill Loan Product, attached to the Joint Application as Exhibit C, is approved, and the technology therein shall be considered approved to receive GEMS financing.

4. For the sake of clarity and avoiding confusion, the final GEM\$ Program Manual shall define energy improvements eligible for GEM\$ on-bill financing as products that: (1) are approved to receive GEMS financing through the Program Notification and/or Program Modification process; and (2) are expected to result in an immediate and consistent estimated bill savings of at least ten percent.

5. To better understand how to reach underserved and hard-to-reach customers, the Joint Filers shall consider using a short, targeted survey, as appropriate.

6. To further promote customer understanding, the final GEM\$ Program Manual must include details that explain how various inputs will be used to calculate the on-bill obligation and the program charge. The Joint Filers should consider providing this information in other ways, such as a website tool or calculator.

7. The final GEM\$ Program Manual shall include an appendix that specifies the data that HGIA will report to the commission, similar to Appendix C of the HEB\$ Program Manual, including the actual bill savings associated with each supported technology. The commission urges HGIA to work with the Hawaiian Electric Companies to provide evidence regarding the actual bill impacts to GEM\$ participants.

8. HGIA shall work with its attorneys to ensure that GEM\$ agreements and forms meet all consumer finance regulations, clearly communicate the explicit rights, responsibilities, and expectations of the participants, participating contractors, and other parties to the transaction, and make clear the costs, program charges, term of the program charge, and all other pertinent information.

9. The Guidance Order does not allow the HECO Companies to defer incremental costs incurred in implementing the GEM\$ Program

in between rate case periods. To the extent the Joint Application moves for reconsideration of the Guidance Order, said motion is denied as untimely.

III.

ORDERS

THE COMMISSION ORDERS:

1. The GEM\$ Program Manual is approved subject to the conditions set forth in this Order.

2. The GEM\$ Residential On-Bill Loan Product, attached to the Joint Application as Exhibit B, is approved, excluding Energy Star refrigerators. The technology therein shall be considered approved to receive GEMS financing.

3. The GEM\$ Commercial On-Bill Loan Product, attached to the Joint Application as Exhibit C, is approved and the technology therein shall be considered approved to receive GEMS financing.

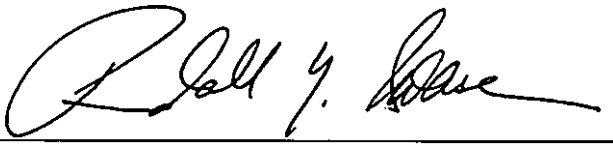
4. The Joint Filers may begin implementing the GEM\$ On-Bill Repayment Program immediately.

5. The Joint Filers shall file a final GEM\$ Program Manual with the commission, consistent with the conditions set forth in this Order, no later than 120 days from the date of this Order.

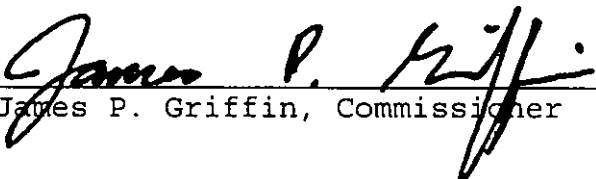
6. To the extent that the Joint Application moves for authorization for the HECO Companies to defer incremental costs incurred in implementing the GEM\$ Program in between rate case periods, said motion is denied.

DONE at Honolulu, Hawaii APR 20 2018

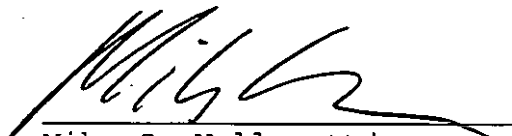
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By 
Randall Y. Iwase, Chair

By 
Lorraine H. Akiba, Commissioner

By 
James P. Griffin, Commissioner

APPROVED AS TO FORM:


Mike S. Wallerstein
Commission Counsel

2014-0135.ljk

CERTIFICATE OF SERVICE

The foregoing Order was served on the date of filing by mail, postage prepaid, and properly addressed to the following parties:

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Certificate of Service

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