BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWA'I

In the Matter of )
) )
PUBLIC UTILITIES COMMISSION ) Docket No. 2018-0088 )
) )
Instituting a Proceeding to Investigate )
Performance-Based Regulation. )
) )

BLUE PLANET’S MOTION TO INTERVENE

MEMORANDUM IN SUPPORT

AFFIDAVIT OF MELISSA MIYASHIRO

ATTACHMENT A

AND

CERTIFICATE OF SERVICE

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BLUE PLANET'S MOTION TO INTERVENE

Pursuant to the Commission’s Order No. 35411, filed on April 18, 2018, and Haw. Admin. R. (“HAR”) § 6-61-55, Blue Planet Foundation (“Blue Planet”), by and through its counsel Earthjustice, hereby moves to intervene in this proceeding to investigate and establish performance-based regulation for the Hawaiian Electric Industries, Inc. utilities (collectively, the “HECO Companies”). In the event that the Commission denies Blue Planet’s request to intervene, Blue Planet alternatively requests to participate in this proceeding pursuant to HAR § 6-61-56. Blue Planet submits a memorandum as well as an affidavit by Melissa Miyashiro in support of this motion and does not request a hearing on this motion. Pursuant to Order No. 35411, Blue Planet also provides comments on the Commission’s preliminary scope and proposed process, included as Attachment A to this filing.
As discussed in the attached Memorandum in Support, Blue Planet has rights and interests related to fossil fuel impacts, clean energy, and the environment that are directly affected by the regulatory framework, incentives, and performance of the HECO Companies. Blue Planet intends to substantially and meaningfully contribute to this proceeding in the same way it has assisted the development of the record and the Commission’s review in a host of dockets spanning the past decade, including numerous consecutive dockets specifically addressing the regulatory framework and incentives of the HECO Companies. Blue Planet should likewise be admitted in this proceeding to allow Blue Planet’s continued engagement on these same issues regarding the HECO Companies’ regulatory framework, incentives, and performance.


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Melissa Miyashiro
BLUE PLANET FOUNDATION
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MEMORANDUM IN SUPPORT

I. INTRODUCTION

Pursuant to Order No. 35411, filed on April 18, 2018 (“Order No. 35411”), Blue Planet Foundation (“Blue Planet”), by its counsel Earthjustice, respectfully requests to intervene under Haw. Admin. R. (“HAR”) § 6-61-55—or if this request is denied, then alternatively to participate under HAR § 6-61-56—in this proceeding to investigate and establish performance-based regulation (“PBR”) of the Hawaiian Electric Industries, Inc. utilities (collectively, the “HECO Companies”). While this comprehensive investigatory docket with potentially expansive and profound impacts for utility customers and the people of Hawai‘i calls for a commensurately broad approach to intervention,¹ Blue Planet provides specific support for its intervention, as follows. Blue Planet has

constitutional and statutory rights to intervene in this proceeding based on its rights and interests in clean energy and a clean and healthful environment, which are directly affected by the regulatory framework, incentives, and performance of the HECO Companies. This comprehensive investigation on PBR is the appropriate and currently only available means by which Blue Planet may protect its interests, and no other party would represent its interests especially given Blue Planet’s long-running stake, involvement, and experience in addressing utility incentives in Hawai‘i. Blue Planet’s admission in this proceeding will not broaden the issues or unduly delay this proceeding, but will rather assist the development of a sound record. Blue Planet thus requests that the Commission grant this motion and allow Blue Planet to intervene in this proceeding.

II. BLUE PLANET MEETS THE REQUIREMENTS FOR INTERVENTION

The Commission’s rules regarding intervention require applications to state the “facts and reasons for the proposed intervention and the position and interest of the applicant,” HAR § 6-61-55(a), enumerate the requisite contents of intervention motions, see id. § 6-61-55(b), and condition intervention on “allegations which are reasonably pertinent and do not unreasonably broaden the issues already presented,” id. § 6-61-55(d). In clear and concise terms, Blue Planet satisfies all the requirements for intervention as follows:
A. The Nature Of The Applicant’s Statutory Or Other Right to Participate In The Hearing.

Blue Planet has rights to participate in this proceeding under numerous legal grounds, including: constitutional provisions mandating due process (U.S. Const. amends. V & XIV, Haw. Const. art. I, § 5), and protecting environmental and public trust rights (Haw. Const. art. XI, §§ 1 and 9); statutory provisions establishing mandates regarding clean energy, energy efficiency, fossil fuel reliance and its impacts, and utility incentives (Haw. Rev. Stat. (“HRS”) §§ 269-6(b), -6(d), -92, -96); and the recently enacted 2018 Haw. Sess. L. Act 5 (“Act 5”), requiring the establishment of “performance incentives and penalty mechanisms that directly tie an electric utility[’s] revenues to that utility’s achievement on performance metrics and break the direct link between allowed revenues and investment levels,” Act 5 § 3(a). The issue of the underlying regulatory framework and incentives and resulting performance of the HECO Companies poses comprehensive and fundamental impacts to Hawai’i’s energy system that directly affect Blue Planet’s rights and interests in clean energy and the environment and the swift transition from fossil fuels to clean energy.

B. The Nature And Extent Of The Applicant’s Property, Financial, And Other Interest In The Pending Matter.

Blue Planet has constitutional, statutory, property, financial, clean energy, and environmental rights and interests in this proceeding to reform the HECO Companies’ incentives and performance in accordance with Hawai’i’s clean energy and
environmental mandates. Blue Planet is a Hawai‘i public-interest, non-profit organization, with thousands of supporters across the state, including in the HECO Companies’ service territories that encompass all the main islands except Kaua‘i, and 95% of the state’s residents. Miyashiro Aff. ¶ 5. Blue Planet’s board members, staff, and supporters have constitutional rights to a clean and healthful environment that are directly and continually affected by the regulatory framework, incentives, and performance of the HECO Companies related to fossil fuels, clean energy, and the environment.2 Id. at ¶ 11.

Blue Planet’s organizational mission is to promote and accelerate Hawai‘i’s expeditious transition away from fossil fuels and clear the path for 100% clean energy in Hawai‘i and beyond. Id. at ¶ 5. Consistent with this mission, Blue Planet actively engages in policy, regulatory, legislative, technical, financial, and related issues concerning the utilities’ regulatory framework, incentives, and performance.3 Id. at ¶¶

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2 See In re Maui Elec. Co., 141 Hawai‘i 249, 253, 264 (2017) (holding that a community group had “a protectable property interest in a clean and healthful environment” under Haw. Const. art. XI, § 9, as defined by HRS § 269-6(b), in a proceeding to review the power purchase agreement for a fossil-fueled facility); see also In re Hawaiian Elec. Co., 56 Haw. 260, 270, 535 P.2d 1102, 1109 (1975) (vacating the Commission’s approval of utility expenditures to increase electricity use and emphasizing that “[i]t is not our intention to belabor the obvious, but the stark reality of the situation is that our energy problems and our environmental concerns are here to stay” and that practices “which are wasteful or which only serve to fuel the energy crisis should be viewed by a regulatory agency with extreme caution”).

3 See id. ¶¶ 8, 10 (listing the numerous dockets over ten years in which the Commission has granted Blue Planet’s motions to intervene). Blue Planet has also
6, 9, 10. Both Blue Planet as an organization, and its board members, staff, and supporters individually, have invested substantial time and resources in furthering Blue Planet’s mission, and Blue Planet has invested substantial time and resources specifically in addressing the reform of the HECO Companies’ incentives in numerous dockets reviewed in Order No. 35411. Miyashiro Aff. at ¶ 10. This commitment of work and resources on the part of Blue Planet and its board members, staff, and supporters underscores Blue Planet’s interests at stake in this case.

C. The Effect Of The Pending Order As To The Applicant’s Interest.

The “pending order” in this case will address critical reforms to the regulatory framework and incentives of the HECO Companies and specifically define and encourage “performance” by the utilities aligned with the public interest. This includes determining whether and to what extent the HECO Companies’ incentives will be realigned to avoid impeding, and to proactively and productively promote, Hawai’i’s progress in breaking its dependence on imported fossil fuels and moving to a new customer-centric clean energy system. This decision will fundamentally and directly affect the interests of Blue Planet and its board members, staff, and supporters in clean energy, a clean and healthful environment, and the swift transition from fossil fuels to clean energy. Miyashiro Aff. ¶ 11.

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participated in a number of working groups such as the Reliability Standards Working Group, the Hawaii Clean Energy Initiative Steering Committee, and the Governor’s Refinery Task Force.
D. The Other Means Available Whereby The Applicant's Interest May Be Protected.

There are no other suitable or equivalent means available whereby Blue Planet’s interest in the outcome of this matter will be protected. Miyashiro Aff. ¶ 12. In fact, Blue Planet has diligently engaged in previous dockets to reform the HECO Companies’ incentives, but the Commission previously deferred such issues to this coming “separate investigative docket to examine a full range of PIM [performance incentive mechanism] and PBR options.”⁴ Now that this proceeding has commenced, it is the exactly appropriate, and currently only available, forum for addressing the underlying regulatory framework and incentives and resulting performance of the HECO Companies.

E. The Extent To Which The Applicant’s Interest Will Not Be Represented By Existing Parties.

Blue Planet’s interest will not be represented by the existing parties or other potential parties. The existing parties are the HECO Companies and the Hawai‘i Department of Commerce and Consumer Affairs, Division of Consumer Advocacy (“CA”), a state government agency. Blue Planet is a public-interest non-governmental organization, with a mission and constituency focused on accelerating the clean energy transition. Miyashiro Aff. ¶ 5. Neither of the existing parties represent Blue Planet’s

interest and mission dedicated to clean energy transformation, but rather represent their own scope and balance of interests that may not align, and may conflict, with Blue Planet’s interests. Specifically on issues of performance incentives and PBR, both the HECO Companies and CA have taken diverging or opposing positions from Blue Planet. Other potential parties will also not represent Blue Planet’s interest, especially given Blue Planet’s long-running engagement and experience on these issues.

F. The Extent To Which The Applicant’s Participation Can Assist In The Development Of A Sound Record.

Blue Planet’s participation can and will significantly assist the Commission with the development of a sound record, based on Blue Planet’s extensive engagement in Hawai‘i’s energy-related laws, policies, plans, and processes, including numerous Commission dockets over many years, and the experience of Blue Planet’s staff, counsel, and consultants who can assist in providing supportive information and analyses on regulatory, technical, economic, and policy matters. Miyashiro Aff. ¶¶ 6-10. This engagement and experience include each of the cases relating to utility performance incentives in the past decade that Order No. 35411 reviews in its background history.

This Commission has cited “Blue Planet’s valuable contributions to other commission dockets” spanning the decade, from the original proceeding on decoupling, Docket No. 2008-0274, and has recognized that Blue Planet would “likely assist the
commission in developing a sound docket record.” In admitting Blue Planet in one of the HECO Companies’ rate cases, Docket No. 2016-0328, the Commission specifically acknowledged “Blue Planet’s contributions and efforts in the Decoupling Docket” (No. 2013-0141) regarding utility incentives and concluded that “Blue Planet’s continued participation in examining these Decoupling Docket issues will assist the commission.”

In this case, Blue Planet is again prepared to provide the expertise of Ronald Binz, former Chair of the Colorado Public Utilities Commission and Colorado Consumer Advocate, who has taken the lead in developing and supporting Blue Planet’s recommendations in numerous consecutive proceedings dating back to Docket No. 2013-0141. The Commission has recognized Mr. Binz’s testimony and expertise on issues related to the HECO Companies’ incentives and noted that “his contributions have been substantive and helpful in developing the record” on such issues.

G. The Extent To Which The Applicant’s Participation Will Broaden The Issues Or Delay The Proceeding.

Blue Planet’s participation will not broaden the issues or delay the proceeding, but will address the issues concerning the utility regulatory framework, incentives, and performance that the Commission has framed in initiating this proceeding, which are

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6 See Order No. 34664 at 75.

issues that Blue Planet has specifically addressed in the other proceedings that have led up to this one. Blue Planet will abide by the procedural schedule and statement of issues established by the Commission in this proceeding, consistent with Blue Planet’s practice in numerous prior and pending Commission dockets. Miyashiro Aff. ¶ 13.

H. The Extent To Which The Applicant’s Interest In The Proceeding Differs From That Of The General Public.

Blue Planet’s interest differs from that of the broader general public because Blue Planet is a non-profit organization focused on accelerating the transition away from fossil fuels and to clean energy. Miyashiro Aff. ¶ 5. Blue Planet’s interest also differs because of the potential impact of this matter on Blue Planet’s dedicated commitment of substantial time and resources in prior and ongoing clean energy work and programs, including addressing issues of the utility regulatory framework, incentives, and performance. *Id.* ¶ 6-10.

I. Whether The Applicant’s Position Is In Support Of Or In Opposition To The Relief Sought.

Blue Planet supports the purpose of this docket of investigating and establishing performance incentives and PBR for the HECO Companies and the mandate of Act 5 to

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8 Based on Blue Planet’s environmental rights in this proceeding, it need not show that its interests are distinct from the general public. *Pele Def. Fund v. Punu Geothermal Venture, 77 Hawai‘i 64, 70, 881 P.2d 1210, 1216 (1994)* (holding that in the realm of environmental interests, “a member of the public has standing to enforce the rights of the public even though the individual’s injury is not different in kind from the public’s generally.”). Blue Planet satisfies this criterion in any event.
establish performance incentives and penalty mechanisms that directly tie utility revenues to performance and break the direct link between revenues and investment levels. At this time, Blue Planet cannot more specifically state its positions pending further investigation in this proceeding.

III. ALTERNATIVELY, BLUE PLANET MEETS THE REQUIREMENTS FOR PARTICIPATION

Alternatively, if the Commission does not grant Blue Planet intervention, Blue Planet meets the requirements for participation without intervention. See HAR § 6-61-55(c). Blue Planet incorporates by reference the support provided in Part II above, since many of the requirements for participation under HAR § 6-61-56(c) closely mirror the requirements for intervention under HAR § 6-61-55(b). As explained above, in line with its substantial contributions in previous proceedings addressing the HECO Companies’ incentives, Blue Planet intends to work closely with expert Mr. Binz in this proceeding and, therefore, can and will contribute expertise, knowledge, and experience on the issues in this proceeding. Blue Planet plans to submit affirmative proposals for utility performance incentives and PBR which can assist the Commission’s investigation and decisions.

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9 Compare HAR § 6-61-56(c)(1)-(4) with id. § 6-61-55(b)(1), (2), (5), (7), (9).
IV. COMMENTS ON THE COMMISSION’S PRELIMINARY SCOPE AND PROPOSED PROCESS

Also pursuant to Order No. 35411, Blue Planet offers comments on the Commission’s preliminary scope and proposed process, which Blue Planet developed in consultation with its expert Mr. Binz. The comments are provided as Attachment A to this filing.

V. CONCLUSION

This proceeding is a culmination of decades of work, progress, and ongoing challenges over decades, and a critical juncture for decades to come in Hawai‘i’s path to 100% renewable energy. Blue Planet remains more committed than ever to effectuate the necessary regulatory reforms to establish 100% utility alignment with the public interest in 100% clean energy. For all of the foregoing reasons, Blue Planet requests that the Commission grant this motion and admit Blue Planet as an intervenor in this proceeding, or if this request is denied, admit Blue Planet as a participant.


/s/ Isaac H. Moriwake
ISAAC H. MORIWAKE
KYLIE W. WAGER CRUZ
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Attorneys for Blue Planet Foundation

Melissa Miyashiro
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AFFIDAVIT OF MELISSA MIYASHIRO

I, MELISSA MIYASHIRO, declare that the following is true and correct, subject to penalty of law.

1. I am the Chief of Staff of Blue Planet Foundation ("Blue Planet"). I have worked with Blue Planet since approximately July 2014.

2. My work address is 55 Merchant Street, Suite 1700, Honolulu, Hawai’i 96813.

3. As Chief of Staff, I manage and participate in many aspects of Blue Planet’s work on clean energy, technical issues, economic issues, utility regulation, and energy policy. This includes, for example, participating in advisory/working groups for the Integrated Resource Planning process, On-Bill Financing, the Refinery Task Force, the Hawai’i Clean Energy Initiative, and other efforts related to clean energy.
4. I also manage the deployment of Blue Planet's staff and consultants for clean energy issues, including issues in a variety of dockets currently and previously before the Public Utilities Commission.

5. Blue Planet's organizational mission is to clear the path for 100% clean energy. Blue Planet is a Hawai'i public interest non-profit organization, with thousands of supporters across the state—including in the service territories of the HECO Companies that encompass all the main islands except Kaua'i and 95% of the state's residents—who support our efforts to promote Hawai'i's swift transition to a clean energy economy through the rapid adoption of renewable energy generation, energy efficiency, and new models and strategies for clean energy.

6. As a leading Hawai'i clean energy advocacy organization, Blue Planet substantially participates in clean energy policy, regulatory, legislative, technical, financial, outreach, and related issues concerning energy. Thus, Blue Planet's staff and retained experts have participated in a number of clean energy matters in Hawai'i. For example, Blue Planet has worked with: Ronald Binz (former Chair of the Colorado PUC and nominee as Chair of the Federal Energy Regulatory Commission); Sebastian Nola (over forty years of experience in the energy industry, including over thirty years in key management positions with Southern California Edison Company, the third largest investor owned electric utility in the United States); and Dr. Matthias Fripp (University
of Hawai‘i Electrical Engineering professor who works on renewable modeling and grid integration issues).

7. For issues related to utility performance and cost-control incentives, Blue Planet works with Mr. Binz. Blue Planet’s staff and additional expert consultant resources are deployed on a case-by-case basis depending on the issues specified for each matter. Blue Planet will be working with Mr. Binz in this docket.


9. Blue Planet has an established track record of productive involvement in regulatory and other proceedings that impact energy policy, planning, generation,
regulation, and implementation. In carrying out this work, Blue Planet collaborates with an array of experts and stakeholders on clean energy policy, technical, economic, and regulatory issues, including issues related to performance-based regulation and regulatory incentives. In addition, Blue Planet implements a variety of programs and initiatives related to clean energy and energy efficiency in Hawai‘i—all of which are directly affected by the incentives imparted in utility regulation in the state.

10. Blue Planet and its board members, staff, and supporters have invested substantial time and resources in furthering Blue Planet’s mission by addressing issues specifically related to utility incentives, including its advocacy in the rate cases (2016-0328 and 2017-0150), the Decoupling dockets (2008-0274 and 2013-0141), and other advocacy efforts related to utility incentives.

11. The HECO Companies’ continued reliance on fossil fuels and the regulatory practices, policies, and incentives that facilitate and promote that reliance, and conversely, the regulatory practices, policies, and incentives related to moving to clean energy and a new customer-centric clean energy system, directly affect the rights and interests of Blue Planet and its board members, staff, and supporters, as well as Blue Planet’s organizational mission.

12. Other than intervention, there are no other suitable or equivalent means available whereby Blue Planet’s interest in the outcome of this matter will be protected. Blue Planet’s interest will not be represented by the existing parties or other potential
parties. Blue Planet's interest differs from that of the Consumer Advocate since that agency lacks the same organizational focus as Blue Planet on the fossil-fuel, clean-energy, and environmental impacts of this proceeding. The Consumer Advocate has frequently taken diverging and opposing positions from Blue Planet in prior dockets on such issues, including specific issues related to the regulatory framework and incentives in the Decoupling dockets and rate cases.

13. As a party to the proceeding, Blue Planet will abide by the procedural schedule and statement of issues established by the Commission. This commitment is consistent with Blue Planet's practice in numerous prior Commission dockets.

FURTHER AFFIANT SAYETH NAUGHT.

DATED: Honolulu, Hawaii, May 8, 2018

Melissa Miyashiro

Melissa Miyashiro

State of Hawaii ) SS.
County of Honolulu )

Subscribed and sworn to before me this 8th day of May, 2018.

Juli R. Price
Notary Public, State of Hawaii

My commission expires: 09/14/2018

Notary Public, State of Hawaii

Commission Number K-38

Juli R. Price, Notary Public

Date
ATTACHMENT A: BLUE PLANET FOUNDATION’S COMMENTS ON THE COMMISSION’S PRELIMINARY SCOPE AND PROPOSED PROCESS

Pursuant to Order No. 35411, filed on April 18, 2018, Blue Planet Foundation ("Blue Planet") offers the following comments on the Commission’s Preliminary Scope and Proposed Process that Blue Planet developed in consultation with its expert Ronald J. Binz:

I. Phase 1:

Blue Planet believes that the form and structure of any regulatory regime inherently operates as a form of incentive regulation; i.e., “all regulation is incentive regulation.” In particular, cost-of-service regulation (“COSR”) per se provides certain incentives to utilities, including a “capital bias” that needs to be overcome or eliminated with reforms to regulation.

The Commission’s proposed potential topics for Phase 1 include:

1. Aside from reasonable, affordable rates, and reliable customer service and satisfaction, what are additional key goals for which performance incentives should be developed?

2. What targets or priority areas of utility performance should be measured and reported to the commission? Why should these areas be measured, and why are they important to the public interest?

3. With respect to specific targets or priority areas, how should performance be measured? To the extent these priority areas are already measured, do the currently employed measurements or evaluations adequately evaluate the utility's performance in these areas?

4. How can the measurement or evaluations of specified areas of utility performance be cost-effectively verified?

(Emphasis added.)

These four inquiries address utility performance within the current regulatory formula. This Phase 1 examination should be about more than discrete areas of utility performance, incentives, and targets identified for improvement in Phase 2. While Blue
Planet supports these inquiries, the list is not complete. The Commission should directly address the comprehensive and fundamental incentives (desirable and not) provided by the form of regulation used today in Hawai‘i. We suggest the addition of at least the following questions:

5. What incentives does COSR provide to regulated utilities?

6. Does COSR provide incentives for utilities to be efficient as firms?

7. Can performance incentives (PIMs, earnings sharing, etc.) be effective in correcting any undesirable incentives provided by COSR?

8. How can the basic structure of regulation be changed to reduce the undesirable effects of COSR?

The Commission also lists four areas to be addressed in a stakeholder process including technical conference(s) or stakeholder workshop(s):

(1) aspects of the current regulatory framework that are functioning well;

(2) aspects of the current regulatory framework that may need improvement;

(3) areas of utility performance that should be measured; and

(4) the manner in which utility performance measurement should occur.

Once again, Blue Planet suggests that, while these are valuable inquiries, the Commission should expand this list with inquiries that go beyond performance under the current regulatory model. The Commission should start looking ahead to possible fundamental changes to the current regulatory model and use the stakeholder workshops to explore such changes and the process that will be needed to develop and implement more fundamental changes.

Along these lines, here are three suggested additional topics for the stakeholder process:

(5) alternatives to COSR;

(6) what process is needed to develop and implement a new regulatory model;
(7) the role of the Commission in a multi-party negotiation to develop a new regulatory model.

This broader and more substantial scope for Phase 1 will also help facilitate compliance with 2018 Haw. Sess. L. Act 5, which establishes a mandate for PBR and also a timeframe for expeditious action. In other words, while Blue Planet agrees a two-phase approach for this docket makes sense, Phase 1 will need to build more extensive groundwork to enable timely and effective action in Phase 2 in compliance with Act 5’s requirements.

II. Phase 2:

The Commission’s proposed potential issues for consideration in Phase 2 included:

(a) energy policy PIMs;

(b) mechanisms to encourage the pursuit of cost-effective, service-based solutions; and

(c) differentiated authorized rates of return on equity, consistent with commission authority set forth in HRS § 269-6(d)(4).

Further refining or supplementing point (c) above, Blue Planet recommends a key broader issue for consideration:

(d) whether a different set of incentives or form of regulation should be applied to the utility’s transmission and distribution function, compared to its generation function.

Finally, the Commission should consider, at the outset, that the task of determining and implementing “substantial material changes to the current regulatory framework” will be a very complex undertaking and probably cannot be accomplished without substantial negotiation among the utilities, the Consumer Advocate, the Commission staff, and significant parties in interest, such as Blue Planet. In order to arrive at a potential “grand bargain,” or even allow a meaningful opportunity to move
toward this goal, the Commission must empower and motivate the parties to commit serious resources to exploring and negotiating major changes in the regulatory model.

An essential part of this motivation must be a strong signal by the Commission that it will act if a consensus approach is not producing timely and efficient progress. But more importantly, given the complexity yet also the fundamental importance and urgency of the task at hand, the Commission must actively and continually look for opportunities to maximize productivity in the process. Thus, beyond directing or dispatching parties to engage in collaboration that may or may not yield returns commensurate with the overall investment of time and resources, the Commission should take a proactive leadership role in this proceeding. This may include articulating Commission guidance or inclinations or staff proposals on key points as necessary, providing staff or third-party facilitation of party and stakeholder discussions, and resolving critical impasses and roadblocks on a responsive ongoing basis. In sum, this proceeding, perhaps more than any other, necessitates that the Commission “lead,” rather than “preside,” to decisively move Hawai‘i forward in the best interests of customers and the public.
CERTIFICATE OF SERVICE

I hereby certify that on the following date a copy of the foregoing document was duly served upon the following parties as follows:

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The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).