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

----- In the Matter of ----- )
PUBLIC UTILITIES COMMISSION )
DOCKET NO. 2018-0088 )

Instituting a Proceeding )
To Investigate Performance- )
Based Regulation. )

ORDER NO. 3 6 3 8 8

CONVENING PHASE 2 AND ESTABLISHING A PROCEDURAL SCHEDULE
CONVENING PHASE 2 AND ESTABLISHING A PROCEDURAL SCHEDULE

By this Order, the commission convenes the second phase of its investigation into performance-based regulation ("PBR") and outlines the structure of and procedural schedule for Phase 2.

The Parties to this proceeding are HAWAIIAN ELECTRIC COMPANY, INC. ("HECO"), HAWAII ELECTRIC LIGHT COMPANY, INC. ("HELCO"), MAUI ELECTRIC COMPANY, LTD. ("MECO") (collectively HECO, HELCO, AND MECO are referred to as the "HECO Companies" or the "Companies") and the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY, an ex officio party, pursuant to Hawaii Revised Statutes ("HRS") § 269-51 and Hawaii Administrative Rules ("HAR") § 16-601-62(a). Additionally, the commission has granted the following entities intervenor status: CITY AND COUNTY OF HONOLULU, COUNTY OF HAWAII, BLUE PLANET FOUNDATION, HAWAI'I PV COALITION, HAWAI'I SOLAR ENERGY ASSOCIATION, LIFE OF THE LAND, ULUPONO INITIATIVE, LLC, and DER COUNCIL OF HAWAI'I. Order No. 35542, "Admitting Intervenors and Participant and Establishing a Schedule of Proceedings," filed June 20, 2018. The commission has also granted participant status to ADVANCED ENERGY ECONOMY INSTITUTE. Id.

The COUNTY OF MAUI was formerly an intervenor, but has since withdrawn from this proceeding. See Order No. 36252, "Granting the County of Maui's Motion to Withdraw," filed April 3, 2019.
I.

BACKGROUND

A.

Relevant Procedural History

On April 18, 2018, the commission initiated this proceeding to evaluate opportunities for updating the regulatory framework for the HECO Companies in light of the transformation of the electric power system.\(^2\)

The commission set out a two-phase approach to guide this proceeding, with the first phase, "Phase 1," intended to examine the current regulatory framework to identify specific areas of focus for further PBR development, and the second phase, "Phase 2," intended to focus on refinement and/or modification to the existing regulatory framework in those specific areas identified in Phase 1.\(^3\)

Between July 2018 and January 2019, the commission organized a series of facilitated technical workshops,

\(^2\)See Order No. 35411, "Instituting a Proceeding to Investigate Performance-Based Regulation," filed April 18, 2018 ("Order No. 35411").

\(^3\)See Order No. 35411 at 52-57.
staff reports, and Party briefing intended to enable all stakeholders to collaboratively address PBR issues for Hawaii.⁴

On February 7, 2019, commission staff issued a comprehensive proposal containing suggested regulatory principles, goals, and outcomes, in addition to specific regulatory mechanisms to measure, address, and achieve the proposed goals and outcomes ("Staff Proposal").⁵ In response, the Parties submitted statements of position providing comment and feedback on the Staff Proposal.⁶

On May 23, 2019, after reviewing the Parties’ briefing, the Staff Proposal, and the entire record to date, the commission issued D&O 36326, which concluded Phase 1 and established the regulatory principles, goals, and outcomes to guide Phase 2, as well as identified a portfolio of specific PBR mechanisms for prioritized examination and development in Phase 2.


⁶See Decision and Order No. 36326, filed May 23, 2019 ("D&O 36326"), Appendix B.
B.

Decision and Order No. 36326

Building on the Staff Proposal and Parties' responding briefs, D&O 36326 adopted the following guiding principles ("Principles") suggested in the Staff Proposal to inform the development of PBR mechanisms in Phase 2:

1. **A customer-centric approach.** A PBR framework should encourage the expanding opportunities for customer choice and participation in all appropriate aspects of utility system functions, including verifiable "day-one" savings for customers.

2. **Administrative efficiency.** PBR offers an opportunity to simplify the regulatory framework and enhance overall administrative efficiency.

3. **Utility financial integrity.** The financial integrity of the utility is essential to its basic obligation to provide safe and reliable electric service for its customers and a PBR framework is intended to preserve the utility's opportunity to earn a fair return on its business and investments, while maintaining attractive utility features, such as access to low-cost capital.\(^7\)

Likewise, D&O 36326 adopted the three regulatory goals ("Goals") and twelve corresponding regulatory outcomes ("Outcomes") suggested in the Staff Proposal:\(^8\)

\(^7\)D&O 36326 at 5-6 (citing Staff Proposal at 21).

\(^8\)D&O 36326 at 6-7.
<table>
<thead>
<tr>
<th>Goal</th>
<th>Regulatory Outcome&lt;sup&gt;9&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Enhance Customer Experience</strong></td>
<td>Traditional: Affordability</td>
</tr>
<tr>
<td></td>
<td>Reliability</td>
</tr>
<tr>
<td></td>
<td>Emergent: Interconnection Experience</td>
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<tr>
<td></td>
<td>Customer Engagement</td>
</tr>
<tr>
<td><strong>Improve Utility Performance</strong></td>
<td>Traditional: Cost Control</td>
</tr>
<tr>
<td></td>
<td>Emergent: DER Asset Effectiveness</td>
</tr>
<tr>
<td></td>
<td>Grid Investment Efficiency</td>
</tr>
<tr>
<td><strong>Advance Societal Outcomes</strong></td>
<td>Traditional: Capital Formation</td>
</tr>
<tr>
<td></td>
<td>Customer Equity</td>
</tr>
<tr>
<td></td>
<td>Emergent: Greenhouse Gas (&quot;GHG&quot;) Reduction</td>
</tr>
<tr>
<td></td>
<td>Electrification of Transportation</td>
</tr>
<tr>
<td></td>
<td>Resilience</td>
</tr>
</tbody>
</table>

Consistent with these Principles, Goals, and Outcomes, D&O 36326 determined that Phase 2 will focus on the development of certain Revenue Adjustment Mechanisms, which will determine the

<sup>9</sup>As described in the Staff Proposal, regulatory outcomes can be distinguished between “traditional” and “emergent.” "Traditional outcomes have been ingrained in utility regulations for many years and, while not immutably achieved or secured in current regulations, they are at least partially addressed." Conversely, "[e]mergent outcomes include those that need attention as Hawaii progresses towards a 100% RPS, as the electricity system becomes more renewable and distributed, and as the HECO Companies pursue opportunities for non-traditional asset investments and services." Staff Proposal at 16.
level of allowed utility revenues during a multi-year rate plan period, and Performance Mechanisms, which will provide for the reporting and tracking of, and potential financial reward for, utility progress towards achieving specific benchmarks or targets, as summarized in the following table:10

<table>
<thead>
<tr>
<th>Revenue Adjustment Mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Multi-Year Rate Plan (MRP) with Indexed Revenue Adjustment</strong></td>
</tr>
<tr>
<td><strong>Earnings Sharing Mechanism (ESM)</strong></td>
</tr>
<tr>
<td><strong>Major Project Interim Recovery (MPIR)</strong></td>
</tr>
<tr>
<td><strong>Revenue Decoupling and Existing Cost Trackers</strong></td>
</tr>
<tr>
<td><strong>Off-Ramps</strong></td>
</tr>
</tbody>
</table>

10D&O 36326 at 15. See also id. at 8-14.

11Annual Revenue Adjustment: Annual adjustment to allowed annual revenues;

   Inflation Factor: Annual change according to a published inflation index;

   X-Factor: Predetermined annual productivity factor;

   Z-Factor: Factor applied (ex post) to account for exceptional circumstances not in the utility’s direct control (e.g., tax law changes); and
**Performance Mechanisms**

<table>
<thead>
<tr>
<th>Performance Incentive Mechanisms (PIMs)</th>
<th>Implement a set of PIMs designed to help drive achievement of the following priority outcomes: Interconnection Experience; Customer Engagement; and DER Asset Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shared Savings Mechanisms</td>
<td>Develop shared savings mechanisms to address priority outcomes including Grid Investment Efficiency and Cost Control, mitigate capex bias, and reward pursuit of cost effective solutions to meet customer needs</td>
</tr>
<tr>
<td>Scorecards and Reported Metrics</td>
<td>Publish Scorecards with targeted performance levels to track progress against the priority outcomes of Interconnection Experience, Customer Engagement, Cost Control, and GHG Reduction and utilize Reported Metrics to highlight performance on the priority outcomes of Affordability, Customer Equity, Electrification of Transportation, Capital Formation, and Resilience</td>
</tr>
</tbody>
</table>

D&O 36326 concluded by stating that the commission would soon be issuing a convening order for Phase 2, which would provide more detail regarding processes and procedures for Phase 2.\footnote{D&O 36326 at 53.}

By this Order, the commission hereby convenes Phase 2.

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**Consumer Dividend Factor:** A "stretch factor" or reduction in allowed revenues.

\footnote{See D&O 36326 at 8–9 n.7.}
II.

DISCUSSION

Phase 2 will continue the collaborative process utilized in Phase 1. In addition to technical workshops, the Parties will participate in Working Group meetings, during which the Parties will organize into Revenue Adjustment Mechanism and Performance Mechanism Working Groups ("RWG" and "PWG," respectively) to present, evaluate, and develop individual comprehensive proposals for the PBR framework described in D&O 36326. Working Group meetings are expected to take place between August 2019 through May 2020. Upon conclusion of the Working Group meetings, there will be a formal briefing period, during which the Parties' comprehensive proposals will be further refined by briefing, information requests, and an evidentiary hearing, which is expected to last through October 2020.

Following the briefing period, as set forth in the procedural schedule below, the commission anticipates issuing a decision and order for Phase 2 in December 2020.
A.

Working Group Process

Phase 2 will initially utilize two participatory Working Groups (the RWG and PWG) to investigate critical issues, evaluate options, and develop proposals for specific regulatory mechanisms identified in D&O 36326. Participation in a Working Group will require a significant commitment of time and attention by the Parties, and the commission expects that each member of the Working Group will exercise a high level of engagement and preparedness, including reviewing and developing meeting materials before meetings, presenting and providing feedback on proposals, and partaking in thoughtful, collaborative discussion during Working Group meetings. Attendance at Working Group meetings and workshops is expected, as is completion of all preparatory or follow-up assignments issued by the facilitator.

The Working Groups will be organized around monthly meetings and technical workshops, supported by a third-party facilitator, who will assist with developing agendas for the Working Group meetings and workshops, issue interim assignments between meetings, moderate discussions and presentations at meetings, and manage other reporting and general administrative functions. The facilitator will circulate briefing notes after each Working Group meeting, providing a short summary of the meeting's presentations and discussions. The facilitator
may also provide periodic status reports during the Working Group process to detail progress and/or to summarize unresolved issues and challenges.

In addition, the facilitator may designate two co-chairs from among the Working Group Members for each Working Group. The Working Group co-chairs are intended to assist the facilitator in coordinating activities of the Parties and managing Working Group meetings, which will require that co-chairs be able to commit additional time and effort to the Working Group process. Commission staff will also attend the Working Group meetings and may assist the facilitator and co-chairs, as appropriate.

As set forth below in Section III, each Working Group will officially meet seven times, roughly once a month, between August 2019 and April 2020.\textsuperscript{13} Recognizing that some Parties may wish to participate in both the RWG and the PWG, the commission intends to schedule the Working Group meetings in a "back-to-back" fashion on consecutive days to accommodate attendees who wish to attend in person, but would need to make travel arrangements. Working Group meetings are expected to last between 3-5 hours.

The Working Group process will commence with the first technical workshop, Workshop A, scheduled for August 7, 2019.

\textsuperscript{13}In addition to the official Working Group meetings identified in the procedural schedule, the Parties may organize themselves to hold additional discussions, as needed.

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followed by a joint meeting of both Working Groups on August 21, 2019, where each Party will present their initial comprehensive PBR proposals. Further details regarding the Working Group meeting structure will be provided at Workshop A. Ultimately, the goal of the Working Group process is the development of high quality, vetted proposals by the Parties in response to the direction provided by the commission in D&O 36326. Accordingly, the facilitator may adjust the focus, pace, and nature of Working Group meetings as needs and circumstances emerge. Similarly, the commission retains the discretion to modify the procedural schedule, as needed.

The procedural schedule also identifies a number of other procedural milestones, for which the commission provides additional details below.

**Workshop A - Phase 2 Opening Workshop.** Phase 2 will commence with an opening workshop, hosted by the commission, on August 7, 2019. The Phase 2 Opening Workshop will provide the Parties with further details and instructions regarding the agendas, topics, and guidelines for the Working Groups, as well as the commission’s expectations regarding the outputs from the Working Groups and the individual Parties. Logistical details for the Working Groups will also be discussed (e.g., estimated number of attendees, provision for remote participation, sharing of contact information, timing of meetings, etc.).
On August 14, 2019, the Parties will file their initial versions of their proposals addressing the PBR issues identified in D&O 36326. These proposals should be comprehensive and address the key mechanisms discussed in D&O 36326, including a proposed annual revenue adjustment formula, ESM, any proposed updates to the MPIR adjustment mechanism, potential off-ramp mechanism, process addressing the end of the initial 5-year MRP, and a suggested portfolio of performance mechanisms. That being said, at this stage, the Parties may not yet be able to specify all relevant details in their proposals for different revenue adjustment and performance mechanisms, and those proposals can thus be submitted with the understanding that the Parties will submit subsequent, further refined proposals as Phase 2 proceeds, incorporating amendments and additional details in response to feedback from the Working Groups. This iterative process is intended to ensure that the Parties explore, test, and improve their respective proposals prior to their final submission to the commission.

**Workshop B - Financial Modeling Workshop.** The commission will host a second facilitated workshop devoted to financial modeling in November 2019. In their prior briefing, several Parties have indicated that they are developing financial models to assist in projecting the impacts of various
PBR mechanisms. The commission will facilitate the utilization of such models to both: (1) review the assumptions and methodologies incorporated into the models; and (2) allow other Parties to make use of these resources in developing, testing, and refining their own proposals. Accordingly, the commission will hold a technical workshop devoted to presenting, comparing, discussing, and evaluating the financial models developed by the Parties.

Parties’ first proposal update and Workshop C - Proposal Presentations. In January 2020, the Parties’ will share an update to their initial proposal. This should include refinements and represent an improvement to the Parties’ initial proposals submitted on August 14, 2019, and reflect the deliberation and progress made in the Working Group meetings up until this point. Further details and supporting analysis should be incorporated to support specific proposal elements.

The commission will host a third facilitated workshop, which will focus on reviewing the progress made by the Parties in developing their proposals to date. Building on the Parties’ submission of their first proposal update earlier that month, the Workshop will feature presentations by the Parties of their

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14See e.g., “Ulupono Initiative LLC’s Reply Statement of Position; and Certificate of Service,” filed April 5, 2019, at 21.
updated proposals, with subsequent discussion on remaining issues and any challenges the Parties may have identified concerning further development of their proposals.

**Parties' second proposal update and Workshop D - Final Workshop.** In May 2020, the Parties' will share a second update to their proposal. Consistent with the iterative nature of this process, this update should reflect further development and refinement of the Parties' respective proposal updates filed in January 2020, and should incorporate any feedback from the January 2020 Workshop C.

The commission also intends to host a final workshop that month, which will represent the last formal opportunity for the Parties to meet and discuss their proposals and related issues before the briefing period commences. The commission does not identify a topic or agenda for this workshop at this time, but will make that determination at a time nearer to the Final Workshop, in order to preserve flexibility to better address the circumstances and then-existing issues.

**B. Formal Briefing Process**

Phase 2 will conclude with a more formal procedural approach to reviewing the Parties' final PBR proposals. At the conclusion of the Working Group process, Parties will have
developed refined comprehensive proposals which, in turn, will serve as the starting point for the formal briefing portion of Phase 2.

Following the conclusion of the Working Group process, the Parties will submit Statements of Position presenting their refined PBR proposals with supporting materials. The schedule will then follow a traditional discovery process, with rolling information requests between the Parties. The Parties may then file Reply Statements of Position. An evidentiary hearing is scheduled to follow, which will include the opportunity for Parties to cross-examine each other’s supporting witnesses. Throughout this process, the commission may issue its own information requests.

III.

PROCEDURAL SCHEDULE

The commission sets forth the following procedural schedule to govern Phase 2 of this proceeding. Notwithstanding the schedule below, the commission retains the discretion to modify this schedule at any time upon the commission’s own motion.
<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>August 7, 2019</td>
<td>Workshop A: Phase 2 Opening Workshop</td>
</tr>
<tr>
<td>August 14, 2019</td>
<td>Parties' initial comprehensive proposals</td>
</tr>
<tr>
<td>August 21, 2019</td>
<td>Joint RWG and PWG Meeting</td>
</tr>
<tr>
<td>September 25-26, 2019</td>
<td>Second RWG and PWG Meetings</td>
</tr>
<tr>
<td>October 2019</td>
<td>Third RWG and PWG Meetings</td>
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<tr>
<td>November 2019</td>
<td>Workshop B: Financial Modeling Workshop</td>
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<tr>
<td>December 2019</td>
<td>Fourth RWG and PWG Meetings</td>
</tr>
<tr>
<td>January 2020</td>
<td>Parties' first proposal update</td>
</tr>
<tr>
<td>January 2020</td>
<td>Workshop C: Proposal Presentations</td>
</tr>
<tr>
<td>February 2020</td>
<td>Fifth RWG and PWG Meetings</td>
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<tr>
<td>March 2020</td>
<td>Sixth RWG and PWG Meetings</td>
</tr>
<tr>
<td>April 2020</td>
<td>Seventh RWG and PWG Meetings</td>
</tr>
<tr>
<td>May 2020</td>
<td>Parties' second proposal update</td>
</tr>
<tr>
<td>May 2020</td>
<td>Workshop D: Final Workshop</td>
</tr>
<tr>
<td>June 2020</td>
<td>Parties' Statements of Position</td>
</tr>
<tr>
<td>June-July 2020</td>
<td>Rolling information requests(^{15})</td>
</tr>
<tr>
<td>August 2020</td>
<td>Parties’ Reply Statements of Position</td>
</tr>
<tr>
<td>October 2020</td>
<td>Evidentiary Hearing</td>
</tr>
<tr>
<td>December 2020</td>
<td>Anticipated date of Phase 2 Decision and Order</td>
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</tbody>
</table>

\(^{15}\) Unless otherwise ordered by the commission, responses to information requests shall be due within ten (10) days of their receipt by the applicable Party.
The commission takes this opportunity to address the procedural schedule as it relates to HRS § 269-16.1, which requires 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[,]" by January 1, 2020.

First, the Performance Mechanisms, as well as the other regulatory mechanisms considered in the instant docket, are intended to encompass a wide range of mechanisms that can incent desirable utility behavior toward achieving a broader range of objectives, and are not intended solely to "break the direct link between allowed revenues and investment levels," as specified in HRS § 269-16.1. In this sense, the scope of this proceeding is more expansive than the focus of HRS § 269-16.1, and seeks to comprehensively transform the regulatory structure in Hawaii using a variety of potential regulatory mechanisms and policies.

Second, this proceeding is not the exclusive means by which the commission is complying with HRS § 269-16.1. PBR mechanisms have long been a priority for the commission - the commission has established a number of performance mechanisms and continues to consider and develop them in on-going proceedings, many of which address the considerations listed in HRS § 269-16.1. For example, the commission has recently implemented a shared
savings mechanism to incent the HECO Companies to procure grid-scale dispatchable renewable energy at competitive costs.\textsuperscript{16} The commission is currently considering similar shared savings mechanisms for: (1) the Companies’ competitive procurement in Phase 2 of Docket No. 2017-0352, for the acquisition of both new grid-scale renewable projects, as well as grid-services;\textsuperscript{17} and (2) HELCO’s negotiations for an amended power purchase agreement with Puna Geothermal Venture ("PGV"), focused on delinking the agreement’s pricing from the cost of fossil fuel and lowering costs to a level competitive with currently-priced renewables, within the timeframe by which PGV expects to come back online.\textsuperscript{18}

\textsuperscript{16}See In re Hawaiian Elec. Co., Inc., Hawaii Elec. Light Co., Inc., and Maui Elec. Co., Ltd., Docket No. 2017-0352, Order No. 35405, “Establishing a Performance Incentive Mechanism for Procurement in Phase 1 of the Hawaiian Electric Companies’ Final Variable Requests for Proposals,” filed April 6, 2018 (resulting in new proceedings which have approved six new solar-plus-storage PPAs at prices below existing comparable projects, and which are expected to reduce energy costs by displacing fossil fuel based plants, which rely on expensive imported fuels, with clean, solar energy procured at newly low prices). Cf. HRS §§ 269-16.1(b)(1) and (7) and 269-6(d)(1).

\textsuperscript{17}See Docket No. 2017-0352, Order No. 36187, “Providing Guidance in Advance of the Hawaiian Electric Companies’ Phase 2 Draft Requests for Proposals for Dispatchable and Renewable Generation,” filed February 27, 2019.

Additionally, the commission recently implemented a risk-sharing component to HECO’s and MECO’s automatic fuel adjustment clauses intended to mitigate the bill impacts associated with volatility in fossil fuel costs and incentivize improved management of HECO’s and MECO’s fuel use and procurement. The commission has also implemented PIMs for the HECO Companies addressing electric service reliability and

customer satisfaction, which the Companies have recently sought to modify.\textsuperscript{21,22}

As reflected by the examples above, the commission is addressing HRS § 269-16.1 in a comprehensive manner through multiple proceedings. The development of PBR mechanisms in this proceeding will yield results consistent with the objectives and mechanisms contemplated in HRS § 269-16.1, but the commission views the PBR proceeding as addressing a broader complement of regulatory


\textsuperscript{22}In addition, the commission recently conditioned full cost recovery under the existing MPIR adjustment clause for Phase 1 of the Companies’ Grid Modernization project, in part, on the satisfactory development of a “Data Access and Privacy Policy,” which is intended to, among other things, enable increased customer choice and support energy efficiency. See In re Hawaiian Elec. Co., Inc., Hawaii Elec. Light Co., Inc., and Maui Elec. Co. Ltd., Docket No. 2018-0141, Decision and Order No. 36230, filed March 25, 2019, at 43-50. Cf. HRS § 269-16.1(b)(5).
issues and opportunities that accomplish, but also reach beyond, the development and implementation of the “performance incentive and penalty mechanisms” described in HRS § 269-16.1.

Concomitantly, the December 2020 Phase 2 decision and order date reflects the commission’s intention to ensure that there is adequate time to properly develop, analyze, review, and evaluate a range of PBR proposals from the Parties. As the Parties are aware, the commission utilized a collaborative, deliberative approach in Phase 1 to incorporate extensive stakeholder input and thoroughly identify, review, and vet desired outcomes and proposed PBR mechanisms. As this proceeding enters Phase 2, where specific mechanisms will be developed and implemented, the commission believes similar considerations apply, and has incorporated additional procedural steps, including formal briefing and an evidentiary hearing, to ensure that the Parties have a meaningful opportunity to be heard and contribute to the record. Given the importance of Phase 2 of this proceeding, including the significance of the outcome to the Companies and their customers, the commission believes that it is proceeding at a pace designed for and necessary to ensure expeditious but comprehensive transformation of the regulatory framework for the Hawaiian Electric Companies.
IV.

ORDERS

THE COMMISSION ORDERS:

1. The structure for Phase 2 is established as described above in Section II, subject to modification at the commission’s discretion.

2. The procedural schedule for Phase 2 is established as set forth in Section III above, subject to modification at the commission’s discretion.

3. Phase 2 will begin with Workshop A, hosted by the commission on August 7, 2019, at the commission’s Honolulu office.

4. The Parties shall submit their initial comprehensive proposals for Phase 2 by August 14, 2019.

DONE at Honolulu, Hawaii           JUN 26 2019

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By James P. Griffin, Chair

By Jennifer M. Potter, Commissioner

APPROVED AS TO FORM:

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2018-0088.kmc
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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