BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

-----In the Matter of-----	)	
	)	
PUBLIC UTILITIES COMMISSION	)	(NON-DOCKETED)
	)	
Emergency Filing and Service	)	
Procedures for Commission's	)	
Precautionary Response to COVID-19	)	
	)	

ORDER NO. 37043

SETTING FORTH PUBLIC UTILITIES COMMISSION EMERGENCY FILING AND SERVICE PROCEDURES RELATED TO COVID-19

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PUBLIC UTILITIES COMMISSION

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OF THE STATE OF HAWAII

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PUBLIC UTILITIES COMMISSION	)	(Non-Docketed)
	)	
Emergency Filing and Service Procedures for Commission's Precautionary Response to COVID-19	)	Order No. 37043

SETTING FORTH PUBLIC UTILITIES COMMISSION EMERGENCY FILING AND SERVICE PROCEDURES RELATED TO COVID-19

By this Order ("Emergency Procedures Order"), and as a precautionary response to the global threat posed by COVID-19, the Public Utilities Commission ("commission") suspends any and all hard copy filing requirements contained in the commission's administrative rules (all Chapters) and prior commission orders, for all Parties, Participants, utilities, stakeholders, and/or any other person or entity that appears before the commission, as set forth herein. The commission implements the emergency electronic filing and other procedures described below (hereinafter "Emergency Filing and Service Procedures"), beginning at 7:45 a.m. on March 16, 2020, and which shall remain in effect until further notice is given by commission order.

I.

BACKGROUND

A.

COVID-19

In 2019, the U.S. Centers for Disease Control announced that it was

> [R]esponding to an outbreak of respiratory disease caused by a novel (new) coronavirus that was first detected in China and which has now been detected in more than 100 locations internationally, including in the United States. The virus has been named "SARS-CoV-2" and the disease it causes has been named "coronavirus disease 2019" (abbreviated "COVID-19").
>
> On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization declared the outbreak a "public health emergency of international concern []."[1]

On March 5, 2020, Governor David Y. Ige issued an Emergency Proclamation, in effect through April 29, 2020, intended to prevent, contain, and mitigate the spread of COVID-19, to provide emergency relief if necessary, and authorize the expenditure of state funds on equipment and supplies as needed.[2]

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[1]"Coronavirus Disease 2019 (COVID-19) Situation Summary," at: https://www.cdc.gov/coronavirus/2019-ncov/summary.html (last visited on March 10, 2020).

[2]Governor's Emergency Proclamation for COVID-19, issued on March 5, 2020, available at: https://governor.hawaii.gov/wp-content/uploads/2020/03/2003020-GOV-Emergency-Proclamation_COVID-19.pdf.

The State of Hawaii began reporting two presumptive positive cases of COVID-19 on March 6 and 8, 2020, as well as a number of other individuals that are under investigation.[3] It is not yet clear if the spread of COVID-19 will escalate rapidly in Hawaii as it has in other states and countries, but the commission is preparing, as a precaution, for that possibility.

The commission implements the following Emergency Filing and Service Procedures for the protection of commission staff, the regulated utilities, parties, participants, stakeholders, entities, and individuals that conduct business before the commission, and the general public, in the interest of maintaining continuity of commission operations while taking precautions for health and safety, to the extent possible, during this time.

B.

Brief Discussion of Commission Rules and Orders that Require Hard Copy Document Filings or Service of Hard Copies of Documents

There are places within the commission's administrative rules, Hawaii Administrative Rules ("HAR") Chapter 16-601, as well as others, and existing commission orders, that as currently written, reference and anticipate filing of

[3]Coronavirus Disease 2019 (COVID-19), at: https://health.hawaii.gov/docd/advisories/novel-coronavirus-2019/#situation, (last visited on March 10, 2020).

hard copies of documents (rather than electronic filings). Below is an illustrative, but not exhaustive, list of commission administrative rules that reference and require hard copy filings:

> **HAR § 16-601-18 Copies.** Unless otherwise required by this chapter or the commission, each party shall file with the commission an original and eight copies of each application, complaint, or other pleading and any amendment to an application, complaint, or other pleading and serve two copies on the consumer advocate. The chairperson or administrative director may require that additional copies be provided or additional persons be served.
>
> **HAR § 16-601-21 Service of Process.**
>
> . . .
>
> (c) Documents <u>shall</u> be served personally or, unless otherwise provided by law, <u>by first class mail</u> (emphasis added);
>
> (d) Service upon a party, other than the commission, shall be deemed complete upon the occurrence of at least one of the following:
>
> (1) The party or its attorney is personally served;
>
> (2) The document is delivered to the party's office or its attorney's office and left with some responsible person; or
>
> (3) The document is properly stamped, addressed, and mailed to the last known address of the party on file with the commission or to its attorney.
>
> (e) Whenever a party has the right to do some act or take some proceedings within a prescribed period after the service of a notice or other document upon the party and

> the notice or document is served upon the party by mail, two days shall be added to the prescribed period.

In addition to the above-described administrative rules, the commission issues procedural and other orders in its dockets that set forth the number of hard copies of filings that are required to be provided to the commission and various parties/participants for a particular docket. For example, Docket No. 2019-0085, Procedural Order No. 36964, requires that the commission receive an original + 8 paper copies, the Consumer Advocate receive 2 paper copies, and Hawaiian Electric Company, Inc., Life of the Land, and Department of Defense receive either 1 paper copy or 1 electronic copy, for all docket filings.[4]

The commission's official website also contains instructions about general filing and eFiling requirements, as discussed below.

Beginning on March 16, 2020, in response to the emergency COVID-19 situation described above, the commission hereby suspends <u>any and all</u> filing requirements set forth in its administrative rules, official commission website (including the "Guidelines for Filing Documents with the Public Utilities Commission,"

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[4]Docket No. 2019-0085, Procedural Order No. 36964, filed on January 24, 2020, at 15. Life of the Land has since withdrawn as a participant to this docket.

dated September 23, 2015), and existing commission procedural and/or other orders that can be construed to require hard (i.e., paper) copies, and will instead require all parties, participants, utilities, stakeholders, and/or other entities or individuals to electronically file ("eFile") any documents or other filings, docketed or otherwise.[5] Instructions on how to do so are set forth below in this Order and will also be made available through information on the commission's website[6] and online Document Management System ("DMS") website.[7] The commission's physical offices, including neighbor island locations, will be closed to non-commission employees beginning at 7:45 a.m. on March 16, 2020, at which time the commission will no longer be accepting any hard copy filings. At this time, the commission is carefully monitoring and will assess the situation, and our ability to reopen our physical offices, as it develops.

As noted above, the commission is implementing these Emergency Filing and Service Procedures for the protection of commission staff, the regulated utilities, parties, participants, stakeholders, entities, and individuals that conduct business

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[5]This includes, but is not limited to, applications, motions, letters, testimonies, statements and reply statements of position, briefs, exhibits, reports, informal complaints, and tariff transmittals.

[6]https://puc.hawaii.gov/

[7]https://dms.puc.hawaii.gov/dms/

before the commission, and the general public, in the interest of maintaining continuity of commission operations while taking precautions for health and safety, to the extent possible, during this time. The commission details its various Emergency Filing and Service Procedures, below:

Electronic Filing. The commission's website contains information on how to eFile (https://puc.hawaii.gov/filing/efiling/). As set forth on the commission's website, any entity seeking to eFile must agree with the DMS eFiling Terms of Use (https://puc.hawaii.gov/wp-content/uploads/2013/06/DMS-EFiling-Terms-of-Use.pdf) and register online.

The commission's website (https://puc.hawaii.gov/filing/efiling/) contains technical requirements regarding eFiling, as does the accompanying DMS eFile "General Information" document, available at https://puc.hawaii.gov/wp-content/uploads/2013/06/DMS-eFile-General-Information.pdf.[8] In light of the intent of this Order, the commission does not require any hard copies of eFiled documents to be submitted to the commission, and the commission's eFiling guidance documents have been amended to reflect that.

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[8]In any instances where filing instructions on the commission's website conflict with the instructions in this Order, this Order supersedes the filing instructions on the website until further notice is given by commission order.

EFiled documents associated with a specific docket will be uploaded to that docket in the commission's Document Management System (https://dms.puc.hawaii.gov/dms/), in accordance with usual commission procedure. For purposes of the tolling of deadlines pursuant to the commission's administrative rules, the date of filing of an eFiled document shall be the date noted in the eFiling stamp. Consistent with current commission procedure, eFiled documents submitted after normal Commission business hours, i.e., 7:45 a.m. to 4:30 p.m. except Saturdays, Sundays, and State of Hawaii holidays, shall not be deemed "filed" until the start of the next Commission business day (see https://puc.hawaii.gov/wp-content/uploads/2013/06/DMS-eFile-General-Information.pdf, at 3).

Clarity/Legibility of eFilings. Please check all documents before eFiling to ensure that they are legible and that any wording, tables, charts, graphs, images, etc., are clear. The commission cautions that it may require that illegible documents be re-filed, which has the potential to result in delays.

Filing Fees. All commission filing fees required pursuant to HAR § 16-601-24 (for applications, motions, etc.) shall be submitted through the commission's eFiling system (https://puc.hawaii.gov/filing/efiling/). Hawaii One Call Center Payments, Motor Carrier Penalties & Interest, and Public Utility Fees shall be submitted through the commission's ePayment system (https://puc.hawaii.gov/filing/payments/).

Any payments submitted after normal commission business hours, i.e., 7:45 a.m. to 4:30 p.m. except Saturdays, Sundays, and State of Hawaii holidays, shall not be deemed "filed" until the start of the next Commission business day.

EFiling Confidential Documents. Previously, the commission did not allow eFiling of any documents that contained confidential redactions pursuant to a commission-issued protective order (i.e., documents containing redactions for confidentiality pursuant to a commission protective order had to be filed with the commission in hard copy). The commission is in the process of modifying its eFiling system to accept both non-confidential and confidential filings (more information can be found at https://puc.hawaii.gov/filing/efiling/), so confidential documents can be eFiled in the same manner as non-confidential documents. While the commission completes these modifications, parties, participants, utilities, stakeholders and/or other entities or individuals are instructed to refrain from submitting confidential filings. The commission anticipates that these modifications will be completed shortly and will post a notice on its website when confidential filings may be eFiled.

The commission's website (https://puc.hawaii.gov/filing/efiling/) and the commission's DMS eFile "General Information" document, available at https://puc.hawaii.gov/wp-content/uploads/2013/06/DMS-eFile-General-Information.pdf,

previously stated that documents containing confidential or proprietary information shall not be eFiled – the commission has amended its website and its eFiling guidance documents to convey that confidential documents CAN be eFiled consistent with this Order.[9]

Utility Monthly, Quarterly, and Rate of Return Reports: All such reports shall be eFiled consistent with the direction, above.

Large Filings. The commission's eFiling system can currently handle PDF files of up to 250 MB, broken up into ten (10) 25 MB segments. Files should be adjusted to accommodate these settings accordingly.

Documents Filed with Commission On CD/DVD. For supporting spreadsheets and other docket-related files that would previously have been filed on a CD/DVD with the commission, please email those files of a size up to 35 MB, noting the relevant docket number and any eFiled documents that the CD/DVD supports or references, to puc.supportingdocketfiles@hawaii.gov.

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[9]In any instances where filing instructions on the commission's website conflict with the instructions in this Order, this Order supersedes the filing instructions on the website until further notice by commission order.

Subject Line: CD/DVD Supporting Files for [Docket No.]

Body:

Docket Number:
Document Type:
Filer Name:
Number of Files Attached:

Service of Documents That Parties, Participants, Utilities, Stakeholders, and/or Other Entities eFile With the Commission. Service of all documents filed by any parties, participants, utilities, stakeholders and/or other entities or individuals shall be via email. All entities making filings before the commission will be required to supply an email address that can be used for service. Any Certificates of Service for docketed or other matters that previously had listed the entity's name and the physical address where a document was served via first-class mail, shall instead reflect the entity's representative's name, entity name, email address where served, as well as the date of service.

In the event a party, participant, utility, stakeholder, entity, or individual changes their email address or changes their designated agent of service, they shall promptly notify the commission of this change and provide a new email address for purposes of effectuating service.

Any applications, petitions, tariff transmittals, etc., filed while this Emergency Procedures Order is in effect shall list the "name, title, and address of the person to whom

correspondence or communications in regard to the application are to be addressed[,]"[10] as well as the e-mail address for that person.

Service of Documents By the Commission. The commission will serve all docketed and non-docketed documents (for example, orders, decisions and orders, information requests, letters, notices, etc.) that the commission generates on parties, participants, utilities, stakeholders, and/or other entities or individuals electronically while this Emergency Procedures Order is in effect. Service of docketed documents will be effectuated through the commission's DMS electronic distribution list.[11] Parties must subscribe to the Docket Distribution List with a valid email address and will be automatically notified via email when a new filing is made in the docket. Service of non-docketed documents by the commission will be done by email. Within five (5) business days of the filing of this Order, parties, participants, utilities, stakeholders, and/or other entities, shall notify the commission at puc@hawaii.gov if they prefer a different email for service than the one(s) where the Emergency Procedures Order was served.

Enlargements of Time. The commission recognizes that parties, participants, utilities, stakeholders, and/or other

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[10]HAR § 16-601-74(B).

[11]See https://dms.puc.hawaii.gov/dms/Subscribe.jsp

entities or individuals may be experiencing disruptions of their usual business functions during this time. While the commission requests that entities make requests for enlargement of time prior to their relevant procedural deadlines, as contemplated by HAR § 16-601-23(a)(1), the commission also states that it intends to, in its discretion and as the circumstances require, liberally construe the "good cause" and "excusable neglect" standards set forth in HAR § 16-601-23 while this Emergency Procedures Order is in effect, in recognition that this is a disruptive time for many of the entities and individuals that appear before the commission.

Inquiries and UIPA Requests Submitted to the Commission's General E-mail Address (puc@hawaii.gov). Public inquiries, Uniform Information Practices ("UIPA") Requests, and other questions and/or comments that are generally submitted to the commission via puc@hawaii.gov should continue to be submitted to that e-mail address during this time.

III.

ORDERS

THE COMMISSION ORDERS:

1. The commission will implement the Emergency Filing and Service Requirements set forth above, beginning on

March 16, 2020, which shall remain in effect until further notice by commission order.

2. The commission is serving this Emergency Procedures Order on all known parties, participants, utilities, stakeholders, other relevant entities or individuals and/or their counsel. Within five (5) business days of the filing of this Order, parties, participants, utilities, stakeholders, and/or other entities or individuals, shall notify the commission at puc@hawaii.gov if they prefer a different email for service than the email address(es) where the Emergency Procedures Order was served.

DONE at Honolulu, Hawaii MAR 13 2020.

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By James P. Griffin
James P. Griffin, Chair

By Jennifer M. Potter
Jennifer M. Potter, Commissioner

APPROVED AS TO FORM:

Caroline C. Ishida
Caroline C. Ishida
Commission Counsel

By
Leodoloff R. Asuncion, Jr., Commissioner

Non-Docketed Order.ljk

CERTIFICATE OF SERVICE

The foregoing order was served on the date of filing electronically to the following e-mail addresses:

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