BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

---- In the Matter of ----

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate Distributed Energy Resource Policies Pertaining To The Hawaiian Electric Companies.

ORDER NO. 37066

ESTABLISHING PROCEDURAL DETAILS AND MODIFYING HAWAIIAN ELECTRIC'S CUSTOMER GRID SUPPLY PLUS PROGRAM FOR HAWAII ISLAND
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ESTABLISHING PROCEDURAL DETAILS AND MODIFYING HAWAIIAN ELECTRIC'S CUSTOMER GRID SUPPLY PLUS PROGRAM FOR HAWAII ISLAND

By this Order,¹ the Public Utilities Commission (“Commission“): (1) announces that it will schedule a status conference to address the April 3, 2020 letter request submitted

²The Parties to this proceeding are HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC LIGHT COMPANY, INC., MAUI ELECTRIC COMPANY, LIMITED (collectively, “Hawaiian Electric” or the “Company”) and the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY (the “Consumer Advocate”), an ex officio party, pursuant to Hawaii Revised Statutes § 269-51 and Hawaii Administrative Rules § 6-61-62(a). In addition, the Commission has granted Intervenor status to the HAWAII PV COALITION (“HPVC”), the DISTRIBUTED ENERGY RESOURCES COUNCIL OF HAWAII (“DERC”), and the HAWAII SOLAR ENERGY ASSOCIATION (“HSEA”). Order No. 36777, “(1) Granting Motions to Intervene Filed By Hawaii PV Coalition, Distributed Energy Resources Council Of Hawaii, And Hawaii Solar Energy Association; (2) Dismissing Without Prejudice The Motion To Participate Filed By Itron, Inc.; (3) Enlarging Time For Itron, Inc. To File A Motion To Participate; And (4) Addressing Other Preliminary Matters,” filed November 15, 2019.
by HPVC, DERC, and HSEA (collectively, the “Solar Parties”); (2) provides further details regarding the scope of issues and process that will govern the investigation in this docket, and (3) modifies Hawaiian Electric’s Customer Grid Supply Plus (“CGS+”) program by expanding the program cap by 5 megawatts (“MW”) on Hawaii Island.

I.

RELEVANT BACKGROUND

On September 24, 2019, the Commission opened this proceeding to investigate the technical, economic, and policy issues associated with distributed energy resources (“DER”) and rate design, as they pertain to the Company. In doing so, the Commission observed that this proceeding would continue the work begun in Docket No. 2014-0192 and Docket No. 2015-0412 which investigated policies and programs for customer-sited DER and customer grid service offerings.

The Commission initially introduced five broad issues to assist in developing the scope of this proceeding, including:\(^3\)

**Programmatic Issues**

- What types of new DER programs should be examined and developed?
- What advanced rate designs will be offered to customers?
- How should existing DER programs and tariffs be addressed?

**Technical Issues**

- What improvements can be made to the interconnection process and technical standards to better facilitate the integration of DER onto the Company’s systems?
- Should legacy equipment be updated or retrofitted to current equipment settings?

The Commission also observed that issues related to DER and advanced rate designs are also being explored in other Commission proceedings, which should be monitored to avoid duplicative efforts and inconsistent results, as well as to carefully manage the Parties’ and Commission’s resources.\(^4\)

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\(^3\)Order No. 36538 at 8-9.

\(^4\)Order No. 36538 at 9.
On January 30, 2020, the Commission hosted a technical workshop where the Parties each offered a presentation that provided:

- The Party’s vision for future DER market options in Hawaii.
- Proposals and considerations for current and new DER tariffs and advanced rate design offerings.
- Technical issues, including opportunities for improvements to the interconnection process, addressing evolving technical standards, and discussing treatment of legacy equipment.
- Suggestions to help facilitate the docket process, including proposed docket structure and scheduling considerations.

Following a discussion on the ideas, proposals, and considerations raised in the Parties’ presentations, the Commission indicated that it would issue a subsequent order providing further details on the scope and process for this proceeding.

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II.

DISCUSSION

The Commission has carefully considered how to organize this proceeding in a way that will most effectively and efficiently address the issues set forth in Order No. 36538.\footnote{The Commission notes that the procedural schedules set forth below currently contemplate a number of Technical Conferences. At this time, in light of the risks posed by COVID-19, the Commission intends to host these Technical Conferences remotely through telephonic or online means. The Commission is closely monitoring the situation and will provide further guidance on meeting logistics as appropriate.}

Upon review of the Parties' presentations,\footnote{The Parties' presentations have all been uploaded to the Commission’s online Document Management System. https://dms.puc.hawaii.gov/dms/dockets?action=search&V DocketNumber=2019-0323} and taking into the account the work begun in Docket Nos. 2014-0192 and 2015-0412, the efforts in this docket will be organized around three major categories of issues: (1) DER Programs; (2) Advanced Rate Design; and (3) Technical Issues. Each of these is explained in further detail below. The Commission clarifies that these categories are not intended to supersede the issues established in Order No. 36538, but instead are offered to help frame the scope of this proceeding and to facilitate a timely and organized approach to assist the Parties with prioritizing the issues that need to be addressed.

The efforts in this docket will be organized around three major categories of issues: (1) DER Programs; (2) Advanced Rate Design; and (3) Technical Issues. Each of these is explained in further detail below. The Commission clarifies that these categories are not intended to supersede the issues established in Order No. 36538, but instead are offered to help frame the scope of this proceeding and to facilitate a timely and organized approach to assist the Parties with prioritizing the issues that need to be addressed.
That being said, prior to initiating these tracks, the Commission will hold a status conference to discuss the immediate impacts resulting from the rapidly developing COVID-19 situation as they pertain to both the solar industry in Hawaii in general and the Solar Parties’ participation in this Docket in particular, including the proposed measures suggested by the Solar Parties to help address this situation.

A.

COVID-19 Emergency

On March 5, 2020, Governor David Y. Ige issued an Emergency Proclamation for COVID-19 declaring an Emergency Period in order to, “provide relief for disaster damages, losses, and suffering, and to protect the health, safety, and welfare of the people.” Additional supplemental proclamations have been issued, which extended the Emergency Period until April 30, 2020. 

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On March 24, 2020, the Commission issued a statement on the COVID-19 Emergency prioritizing actions that can: (1) ensure reliable and affordable essential services; (2) achieve clean energy and climate goals; and (3) support economic recovery from COVID-19 Emergency.\(^{10}\)

On April 3, 2020, the Solar Parties submitted a joint letter to the Commission requesting “prompt action directing [Hawaiian Electric] to expedite key points of delay in their interconnection process, and to allow small DER systems to begin operation upon installation with inverter safety features activated.”\(^{11}\) In their Letter, the Solar Parties proposed several discrete measures which the Solar Parties submit “would meaningfully address and promote the Commission’s three expressed priorities, as well as help the existing DER industry and its thousands of employees weather the immediate crisis.”\(^{12}\)

In this regard, the Solar Parties stated:

We anticipate DER will be a critical contributor to Hawaii’s economic resilience.


\(^{12}\)Solar Parties’ Letter at 1.
and eventual recovery from the coronavirus disruption, creating needed jobs and economic stimulus, helping Hawaii residents reduce the high cost of electricity, and continuing our progress and momentum toward our clean energy goals. But the existing solar industry must survive over the next six months to be able to assist with that recovery.\textsuperscript{13}

The Commission agrees that there is an urgent need to address this situation and will convene a status conference with the Parties to discuss the Solar Parties’ proposed measures, including comment and feedback from the Company and the Consumer Advocate. The Commission will also solicit feedback from the Parties regarding the general state of the DER market in Hawaii and the impacts this may have on this proceeding, including the time, resources, and contributions from the Solar Parties.

Consistent with Order No. 37043,\textsuperscript{14} setting forth the Commission’s emergency procedures related to COVID-19, the Commission will arrange for a status conference with the Parties through remote participation and will provide the Parties with electronic notification of the time, date, and access details for the status conference.

\textsuperscript{13}Solar Parties’ Letter at 2.

B. 
DER Program Track

A key outcome of this proceeding is the establishment of long-term DER programs to supplement the Net Energy Metering program and facilitate the transition from various interim DER tariff options currently in place.\textsuperscript{15} Based on the Parties’ presentations at the technical conference, there appears to be consensus that fewer programs are desirable (i.e., one to two DER tariffs to promote simplicity), and the DER programs offered should ensure customers receive compensation for both energy exports and grid services. Accordingly, the primary objectives of the DER Program Track include:

- **Design and implement long-term DER programs:** At this stage, the Commission is inclined to focus development on two types of programs for both residential and commercial customers: (1) a basic, export-only program; and (2) a more advanced program which will feature compensation for a combination of energy exports and grid services. Development of long-term DER programs should consider how to simplify how grid service compensation is provided to customers. Development of long-term DER programs should also include consideration

\textsuperscript{15}See Hawaiian Electric’s Rules 23, 24, and 25.
for system sizes greater than 100 kW as a potential alternative to the Standard Interconnection Agreement. A purely self-supply option with an expedited review process, intended to be similar in design to the current interim CSS program, should remain as a behind-the-meter choice for residential customers.

- Develop a transition plan for interim DER programs: The transition from interim programs such as Customer Grid Supply, Customer Grid Supply Plus, Customer Self Supply, and Smart Export to implementing long-term DER programs should be carefully coordinated to promote market stability and minimize customer confusion.

A number of Parties have indicated that there is urgency to develop a long-term DER successor program to address the scheduled step down of the federal solar Investment Tax Credit, also known as the investment tax credit (“ITC”), in 2021 and its expiration in 2022.16 Acknowledging these concerns, the Commission intends to prioritize the DER Program Track in 2020, as set forth in the procedural schedule below. The Commission’s goal is to approve the tariffs for new DER programs in early 2021. To accomplish this, Parties should focus on promptly developing

16See HSEA presentation.
written proposals that can be discussed and vetted in a series of technical workshops held during the summer and fall, with final proposals due in late fall.

As reflected in the procedural schedule below, the DER Program Track will begin with initial proposals submitted by the Parties in June 2020. Given the ambitious timeframe for this Track, it is critical for the Parties to frame their proposals in an organized, structured manner. The initial proposals should include a quantitative estimate of the value of the program to customers (e.g., estimates of bill credit rates, direct payments, or other values). Details regarding grid services capability and performance standards should also be included. A round of information requests ("IRs") will allow the Parties to begin reviewing and vetting each other’s proposals.

A Technical Conference in July will allow the Parties to present and discuss potential improvements to their initial proposals, as well as allow for continued discussion of areas where questions remain. Parties will incorporate this feedback into a round of proposal updates, which will be submitted near the end of August 2020. These updates should incorporate feedback and new evidence produced during the first round of IRs and at the July Technical Conference and reflect improvement from the Parties’ initial proposals. Vetting and analysis of the Parties’
proposal updates via a second round of IRs will continue throughout the fall.

A second Technical Conference will be held in October. The intent of this conference will be to address questions about the Parties’ proposal updates, as further illuminated by the Parties’ IRs. Parties will then have an opportunity to submit final proposals in November. The Parties’ final proposals should be comprehensive and include the necessary support for implementation, including consideration of draft tariff language.

This procedural structure is designed to provide more time for the Parties and the Commission to review and analyze the Parties’ final proposals and ask refining questions, rather than pushing the deadline for final proposals back and leaving less time to review them before issuing a decision and order. Additionally, consistent with the Commission’s goal of approving new DER programs in early 2021, the Commission is also factoring in additional “back end” time to resolve technical issues such as finalizing tariff language and addressing implementation of the new DER programs.

To meet this ambitious timeframe, the Commission expects the Parties to prepare well-developed proposals that include comprehensive program designs and compensation structures that are relatively simple and supported by transparent quantitative analysis to facilitate review. Overly complex or underdeveloped
proposals will require greater time and effort to discuss and vet, which could delay capturing the benefits DER technologies can provide. The Commission is encouraged by the Parties’ presentations at the January 30 Technical Conference, which reflect alignment on a number of programmatic issues.

C.

Advanced Rate Design Track

Rate design is “the regulatory term used to describe the pricing structure used by electric utilities . . . . It explicitly includes the itemized prices set forth in tariffs and implicitly includes the underlying theory and process used to derive those prices.”\textsuperscript{17} Longstanding principles of rate design developed by James Bonbright in the 1960s establish that rates should be designed to allow utilities to sufficiently recover their costs; fairly apportion costs amongst different customers and avoid “undue discrimination” in rate relationships; set efficient price signals that discourage energy waste; and be acceptable to

customers by being relatively stable, predictable, simple and understandable.\(^{18}\)

Throughout Hawaii, most customers are on rates consisting of a customer charge, non-fuel energy charge, and additional provisions such as a minimum bill, demand charge for some non-residential customers, the energy cost recovery clause, purchased power adjustment charge, and other surcharges. More advanced rates such as time-of-use and interruptible service rates currently exist, though with limited availability and uptake by customers.\(^{19}\) The Commission observes that the Company’s rate design has not significantly changed for a number of years, and should be examined to account for the new realities facing the Company and its customers.

The Commission reaffirms guidance provided in approving the Company’s proposed grid modernization Phase 1 project, that dynamic rate designs are critical to aligning customer behavior with grid needs to realize the full value of DER and to allow all customers opportunities to participate in the energy system. Such rate designs enable the Company to

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leverage investments in advanced metering infrastructure, telecommunications, and improved sensing and data functionalities, and other components of the Company’s Grid Modernization Strategy.\textsuperscript{20}

Rates provide a price signal that can influence electricity consumption patterns and drive technology investment activity. As such, and consistent with the principles and previous Commission guidance summarized above, rates should be designed to encourage energy efficiency and demand flexibility, improve grid resilience, promote reliability, reduce environmental impacts, and achieve other State energy policy goals. Rate design should strive to ensure fairness in how costs are allocated among different types of customers to avoid undue discrimination and unfair cross-subsidization among ratepayers. The Commission acknowledges that in setting rates, there are also many policy considerations and potential tradeoffs amongst priorities. Accordingly, the Commission will review rate proposals with the above principles and priorities in mind, noting that the primary objectives of the Advanced Rate Design Track are:

- Unbundling of costs to facilitate a reasonable allocation of system costs among customers and to develop reasonable rates and charges

\textsuperscript{20}Decision and Order No. 36230, Docket No. 2018-0141 at 51.
- Evaluating benefits and drawbacks of specific rate design options, such as minimum bills, fixed charges, variable charges, etc.
- Appropriately balancing the objectives and priorities for advanced rate designs discussed above
- Establishing advanced rate designs including time-of-use (“TOU”) rate options for residential and commercial customers
- Developing pilot programs to evaluate other advanced rate design options (e.g., subscription rates, real-time pricing, etc.)
- Updating electric vehicle (“EV”) rate structures (e.g., residential and commercial EV, EV-Bus, Fast EV charging) to incorporate lessons learned and to improve the effectiveness of the rate options
- Addressing challenges currently faced by low- and moderate-income customers and creating new opportunities to facilitate customer equity

The Commission intends to proceed deliberately in its examination of the Parties’ proposed cost allocation methodologies and rate designs and contemplates that investigation of advanced rate design will likely continue into 2021.

As reflected in the procedural schedule below, the Advanced Rate Design Track will begin with a Technical Conference in June focused specifically on rate design. The Commission observes that at the January 30, 2020 Technical Conference, discussion of rate design was not included in a number of presentations. Given the importance of rate design and its relationship to the development of DER policies, 2019-0323
the Commission continues to emphasize the importance of rate design issues in this proceeding. Accordingly, presentations at this June Technical Conference should comprehensively address the Company’s current rate design, including opportunities for improvement in light of the objectives identified above; discuss the proposals contained in the Company’s Advanced Rate Design Strategy (“ARDS”); and identify data needs and potential studies that may be beneficial to support this investigation, including time necessary for collection and analysis before results will be available.

Following the June Technical Conference, there will be a comment period on the advanced rate designs that should be offered to customers. Comments should take into account the objectives and priorities discussed in this Order, the Company’s ARDS, and the perspectives and ideas raised in the June Technical Conference. At this time, the Commission envisions the Technical Conference and comment period will serve to launch a larger working group discussion on the prioritized objectives listed above, through the summer of 2020. However, as the proceeding progresses, the Commission may re-visit this structure and approach, depending on the circumstances.

Following the working group process, the Parties will submit their initial proposals in December 2020. These Proposals should include, with the greatest specificity possible,
proposed advanced rate designs as discussed above, with specific
discussion explaining how each Party has considered and balanced
the factors and issues inherent in designing rates in Hawaii.

A round of IRs will follow, which will allow the Parties
to gain more understanding about each other’s proposals.

In February 2021, there will be another
Technical Conference to present and discuss the Parties’ initial
proposals, as further vetted by IRs to date (the IR period
deliberately extends beyond the February Technical Conference to
allow for a robust and thorough vetting process).

This will be followed by Parties’ Final Proposals in
April 2021. The Commission will then consider the entire record
for the Advanced Rate Design Track and issue a decision and
order subsequently.

While longer in duration than the DER Program Track,
the Advanced Rate Design Track will continue through 2021 to
accommodate a number of considerations, including:

• The potential need for data exchange and evaluation
  of rate design studies (e.g., load research, cost allocation studies, cost of service analyses, unbundled cost analysis, etc.), and

• The fact that the Parties will be focusing on the
  DER Program Track in 2020.
D.

Technical Track

The Technical Track will cover many of the technical issues that have been carried over from Docket No. 2014-0192, including the ongoing discussion about improvements to the interconnection process for DER, the importance of updating interconnection standards and requirements to better utilize the capabilities of DER, and the need to consider upgrading legacy equipment (e.g., inverters) that have been installed over the years but do not provide the same level of functionality as modern equipment. Accordingly, the primary objectives of the Technical Track include:

- Streamlining and improving the interconnection process
- Harmonizing the Company’s Rule 14H requirements with current Institute of Electrical and Electronics Engineers (“IEEE”) standards
- Developing policies and procedures for the activation of additional advanced inverter functions
- Developing policies and procedures to update legacy equipment, including inverters, to allow for participation in new DER programs

The Commission notes that efforts have been underway for several years to address some of these objectives. For example, the Commission is aware that the Company is developing a work plan
to address upgrading legacy equipment. Additionally, the Company is working with DER stakeholders and the Interstate Renewable Energy Council ("IREC") to develop recommendations for harmonizing the Company’s interconnection rules with the standard promulgated by the IEEE. The Company has also been piloting the activation of the volt-watt advanced inverter function and are currently engaged in discussion with stakeholders regarding the potential benefits and costs of activating this function. Lastly, at the January 2020 Workshop, the Company’s presentation indicated it is in the process of developing improvements designed to streamline the interconnection process.22

In light of the above, the Commission is encouraged by the progress being made to address these objectives and expects current activities of the Company and DER stakeholders to continue in the Technical Track.

The procedural schedule for the Technical Track takes advantage of these efforts already underway. The Commission will monitor the Company’s progress in developing and submitting their proposed work plan for addressing legacy equipment. Subsequently,

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the Commission intends to provide for a comment period by the Parties in July 2020. In August 2020, the Commission will host a Technical Conference on this issue.

Similarly, throughout 2020, the Commission will monitor the development of recommendations by DER stakeholders and the Company for harmonizing the Company’s Rule 14H with IEEE 1547-2018. A similar Party comment opportunity will follow in December 2020.

The Commission also intends to track the Company’s progress towards improving the interconnection process. The Company is expected to work with the other Parties to solicit and incorporate feedback regarding the Company’s efforts in this area. The Parties will report on the progress made in this area at the August Technical Conference. As with the Company’s legacy workplan and IEEE harmonization efforts, the Parties will have an opportunity to submit written comments.

The Commission will reserve 2021 for addressing unresolved Technical Track issues. Additionally, this period may be used to address new technical issues that may arise during this proceeding. Depending on the circumstances of any unresolved technical issues, as well as any new technical issues that emerge, the Commission may establish further briefing and discovery deadlines, as appropriate.
Finally, as noted below, there is no single deadline by which a decision and order is expected to address issues that arise in this proceeding. Rather, the Commission intends to address and/or resolve DER issues as they become ripe for decision-making. To this end, to the extent Parties reach agreement on a particular issue, or set of issues, they do not need to wait for the established comment period but may submit stipulated agreements at any time for the Commission’s review.

III.

PROCEDURAL SCHEDULE

As discussed above, the Commission intends to consider a number of issues in parallel tracks, each with its own procedural milestones and events, as set forth below:

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<tr>
<th>DER Program Track</th>
<th>Date Range</th>
<th>Event</th>
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<td>Initial Proposals</td>
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<td>July 1 - August 5, 2020</td>
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<td>First round of IRs</td>
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<td>July 23, 2020</td>
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<td>August 26, 2020</td>
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<td>Proposal updates</td>
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<td>November 5, 2020</td>
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<td>Final Proposals</td>
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<tr>
<td>Subsequent to receiving Party comments</td>
<td></td>
<td>Anticipated D&amp;O</td>
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### Advanced Rate Design Track

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<tr>
<th>Date</th>
<th>Event Description</th>
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<tr>
<td>June 4, 2020</td>
<td>Technical Conference focused on rate design</td>
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<tr>
<td>June 30, 2020</td>
<td>Party comments on the advanced rate designs that should be offered to customers</td>
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<tr>
<td>July-October 2020</td>
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<td>December 17, 2020</td>
<td>Initial Proposals</td>
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<td>December 18 - March 4, 2021</td>
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<td>February 18, 2021</td>
<td>Technical Conference</td>
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<td>April 1, 2021</td>
<td>Final Proposals</td>
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<tr>
<td>Subsequent to receiving Final Proposals</td>
<td>Anticipated D&amp;O</td>
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### Technical Track

<table>
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<tr>
<th>Date</th>
<th>Event Description</th>
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<tbody>
<tr>
<td>May 2020</td>
<td>Company’s work plan for addressing legacy equipment</td>
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<tr>
<td>July 16, 2020</td>
<td>Party comments on Company’s work plan</td>
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<tr>
<td>August 4, 2020</td>
<td>Technical Conference</td>
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<td>October/November 2020</td>
<td>Harmonization Proposal for IEEE 1547-2018</td>
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<tr>
<td>December 17, 2020</td>
<td>Party comments on Harmonization Proposal and Company’s interconnection improvement progress</td>
</tr>
<tr>
<td>2021</td>
<td>Reserved to address unresolved and new Technical Issues</td>
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</tbody>
</table>

Decisions and Orders addressing DER issues are expected to be issued as matters become ripe for decision-making.
The Commission reserves the right to modify the procedural schedule, upon motion or stipulation by the Parties, as approved by the Commission, or upon the Commission’s own motion.

IV. 

CGS+ EXPANSION FOR HAWAII ISLAND

The Commission previously established capacity limits specific to each of the Company’s service territories on Oahu, Maui, and Hawaii island for the CGS+ program in Decision and Order No. 34924 in Docket No. 2014-0192, initially establishing a limit of 7 MW for Hawaii island. The Commission further directed the Company to “publicly announce and notify the Commission and Parties when 50%, 75%, and 90% of their respective program caps have been reached”.

Pursuant to this requirement, the Company notified the Commission that it has reached the 75% capacity threshold for conditionally approved applications for the CGS+ program on Hawaii island in a letter dated March 19, 2020.

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24 D&O 34924 at 182.

The Commission recognizes that Hawaii island has reached 75% of its CGS+ capacity limit with conditionally approved programs. The Commission further recognizes the benefit of expanded economic opportunities given the vast impacts of the COVID-19 pandemic. For these reasons, the Commission will expand the CGS+ program for Hawaii island by 5 MW, for a total program capacity of 12 MW. This value takes into consideration that the CGS+ program for Hawaii island has acquired about 5.45 MW of capacity since October 2017.26 If installations occur at a similar rate, the additional 5 MWs of capacity approved through this order would likely allow the CGS+ program for Hawaii island to continue through about mid-year 2021, allowing a runway period for CGS+ to continue as new DER programs established through this proceeding come online at the end of 2020.

V.

ORDERS

THE COMMISSION ORDERS:


26See CGS+ Letter at 3.
2. The scope and process of this proceeding, as initially set forth in Order No. 36538, is clarified and established as set forth above.

3. The program capacity for Hawaiian Electric’s CGS+ program on Hawaii island is increased by 5 MW, to a total of 12 MW.

DONE at Honolulu, Hawaii APRIL 9, 2020.

PUBLIC UTILITIES COMMISSION OF THE STATE OF HAWAII

By James P. Griffin, Chair

By Jennifer M. Potter, Commissioner

By Leodoloff R. Asuncion, Jr., Commissioner

APPROVED AS TO FORM:

Mark Kaetsu
Commission Counsel
CERTIFICATE OF SERVICE

Pursuant to Order No. 37043, the foregoing order was served on the date it was uploaded to the Public Utilities Commission’s Document Management System and served through the Document Management System’s electronic Distribution List.
The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).