B E F O R E  T H E  P U B L I C  U T I L I T I E S  C O M M I S S I O N  
O F  T H E  S T A T E  O F  H A W A I I 

In the Matter of the Application of )
) )
KAUAI ISLAND UTILITY COOPERATIVE ) DOCKET NO. 2020-0218 )
For Approval of Power Purchase Agreement )
with AES West Kauai Energy Project, LLC )
and to include Costs in Kauai Island Utility )
Cooperative’s Energy Rate Adjustment )
Clause, and Other Related Matters Related )
to the West Kauai Energy Project. )

D I V I S I O N  O F  C O N S U M E R  A D V O C A C Y ’ S  
M O T I O N  T O  I N T E R V E N E  

Pursuant to the Hawaii Administrative Rules (“HAR”) § 16-601-41(d), the Division of Consumer Advocacy, Department of Commerce and Consumer Affairs (“Consumer Advocate”), by and through its attorneys, supports the Hawaii State Energy Office’s (“HSEO” or “SEO”) Motion To Intervene, filed on January 20, 2021 (“Motion”).

HSEO states, as part of its Motion:

The SEO possesses unique expertise, past involvement, and standing on matters related to renewable energy, energy storage, decarbonization, and energy security. Also, the issues and topics in this docket are highly interrelated and affected by State energy policies, in which the SEO has extensive interest and experience.¹

HSEO further states:

¹ Motion, at 2-3.
The SEO’s broad and deep experience in energy matters, as well as its statutory obligations, will enable the SEO to contribute to the discussions and assessments of current and evolving technologies, potential impacts and interactions with residential, commercial, government, and policy decisions, and potential cost and economic drivers for adoption decisions.²

The Consumer Advocate notes that the HSEO’s statutory obligations under Hawaii Revised Statutes (“HRS”) § 196-71 include its obligation to promote renewable energy to help achieve a resilient clean energy economy³ and that it shall provide analysis and planning to develop and inform policies to achieve renewable energy goals with the Commission and other relevant stakeholders.⁴ The Consumer Advocate further notes that under HRS § 196-72 the Chief Energy Officer of HSEO shall, subject to approval by the governor:

Advocate for the State’s energy and decarbonization goals at relevant venues and departments, including but not limited to the public utilities commission, legislature, and division of consumer advocacy, to ensure that state energy policies and regulations align with the state strategic goals and are data-driven."⁵

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² Motion, at 3.

³ HRS § 196-71(a) states, in relevant part:

The purpose of the Hawaii state energy office shall be to promote energy efficiency, renewable energy, and clean transportation to help achieve a resilient clean energy economy.

⁴ HRS § 196-71(b) states:

(b) The Hawaii state energy office shall:

(1) Provide analysis and planning to actively develop and inform policies to achieve energy efficiency, renewable energy, energy resiliency, and clean transportation goals with the legislature, public utilities commission, state agencies, and other relevant stakeholders;

(2) Lead efforts to incorporate energy efficiency, renewable energy, energy resiliency, and clean transportation to reduce costs and achieve clean energy goals across all public facilities;

(3) Provide renewable energy, energy efficiency, energy resiliency, and clean transportation project deployment facilitation to assist private sector project completion when aligned with state energy goals; and

(4) Engage the private sector to help lead efforts to achieve renewable energy and clean transportation goals through the Hawaii clean energy initiative.

⁵ HRS § 196-72(d)(13).
The Consumer Advocate believes that HSEO’s participation in the subject docket is consistent with its statutory obligations as a state agency, contributing towards the analysis of the applicant’s requests. Moreover, HSEO states that it has no intention of broadening the issues or delaying the subject proceeding as doing so would be against its own interests and contrary to its obligations. As a result, the Consumer Advocate supports HSEO’s Motion.


Respectfully submitted,

By /s/ Lane H. Tsuchiyama
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DIVISION OF CONSUMER ADVOCACY
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing DIVISION OF CONSUMER ADVOCACY’S RESPONSE TO THE HAWAII STATE ENERGY OFFICE’S MOTION TO INTERVENE was duly served upon the following parties electronically to the e-mail addresses below pursuant to HAR § 16-601-21(d), as modified by Order No 37043 Setting Forth Public Utilities Commission Emergency Filing And Service Procedures Related To COVID-19, filed on March 13, 2020.

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