
Aloha e Public Utilities Commissioners,

It has come to our attention that the PUC and Hawaiian Electric intend to issue an RFP soliciting input from developers for allowable CBRE proposals with opportunities for O‘ahu residents to participate in a solar energy project even if excluded from direct participation, i.e. live in an apartment, renting, etc.

While the West O‘ahu/Kalaeloa Community Clean Energy ‘Ohana (WOCEO) in general supports projects which move us from fossil fuel to renewable “clean” energy we are concerned about the current trend and possible continuation of negative impacts on an already over-burdened community with multiple energy generating systems and negative industrial industries. We host a military training ground, military radio transmitting facility, military munitions storage facility, the only landfills located on O‘ahu and other deleterious projects.

We respectfully request the Public Utilities Commission (PUC) to temporarily suspend/hold the CBRE Request for Proposals (RFP) to allow for the much-needed time for O‘ahu communities to learn about and to participate in the CBRE RFP design process.

To re-iterate, the WOCEO supports energy independence and the transition to a “clean” energy system, however, we are deeply concerned and disturbed by the continual attack on the community by the placement of energy generating facilities and other negative environmental businesses on the Westside of O‘ahu with its distinctive geographic, cultural and social landscapes.

In the latest map received from the Hawaiian Electric Company, it is very evident that the major energy producing facilities are located from Central O‘ahu to ‘Ewa and then to Ka‘ena Point with 1414.1 MW currently being generated, another 475.5 MW approved to build and 15 MW being reviewed for approval. The North Shore hosts 118 MW worth of wind and solar generation. Kahuku hosts 54 MW via wind generation. Waiawa is approved to have installed 66 MW worth of energy generation. Lastly, Waiau and the Airport provide 508 MW of energy generation. Per the 12/31/2020 Power Facts Sheet on the Hawaiian Electric Website, the combination of total firm energy production available (1794.5) + Variable generation (HECO) (20) + Variable generation (Independent producers) (approximately 340) yields 2154.5 MW. Comparing this figure to what is currently being generated above in the West O‘ahu, Central O‘ahu, North Shore and Kahuku areas of 1586.1 MW yields a burden of 74% of the total energy produced on island (minus customer-sited renewable).

Additionally, we understand that smaller projects proposed on O‘ahu, 250 kW – 5 MW, have a separate evaluation process that doesn’t require PUC approval. In West O‘ahu/Kalaeloa, with larger parcels of property, that could potentially result in multiple individual owners proposing small projects in the RFP to establish solar farms on their property and if, coincidentally numerous nearby owners decide to do that, could have the unintended consequence of appearing to be a single large solar farm within the community that circumvented community input and involvement.
Therefore, the broader perception is validated that West O‘ahu/Kalaeloa, Central O‘ahu, North Shore and Kahuku, bear the brunt of providing a major share of the energy for the entire island and that these same communities with the least economically tend to share more, be more tolerant and giving, be less assertive, and accept what is unfair. This appearance and validated social and economic injustice drive over-burdened communities to demand that our basic rights be acknowledged and confirmed via the decisions that HECO and the PUC makes as we move towards 100% renewable energy.

In February of 1994, Presidential Executive Order 12898 was signed.

“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” (EO 12898) directs each Federal Agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations,” including tribal populations.

The Presidential Memorandum accompanying EO 12898 emphasizes the importance of using the NEPA review processes to promote environmental justice. It directs Federal agencies to analyze the environmental effects, including human health, economic, and social effects, of their proposed actions on minority and low-income communities when required by NEPA.

The Memorandum calls for agencies to address significant adverse environmental effects on these communities in mitigation measures outlined or analyzed in:

- Environmental assessments (EAs)
- Findings of no significant impact (FONSI)
- Environmental impact statements (EIS)
- Records of decision (ROD)

While this process does not require a NEPA review, the State of Hawai‘i and the PUC should, in the spirit of fairness, do no less than what is being required of our Federal partners to evaluate and guarantee environmental justice for all, especially communities of minorities and low-income communities.

In addition to this general fairness concept adopted by the Federal government, we are recommending a number of items as it has also been experienced via questions and concerns raised at City and County of Honolulu Neighborhood Board meetings, as well as meetings with current approved developers of renewable energy projects, Hawaiian Electric and the Hawai‘i State Energy Office. These suggestions are intended to reflect community priorities and values, increase transparency and trust in the RFP process, and strengthen energy resilience for the entire island of O‘ahu.

Recommendations:

- That the current process be paused to allow the community historically impacted by projects of renewable energy to participate in the process.
• The process should be opened to re-evaluate and restructure the actual procedure and requirements to allow for proposals to be submitted that might be more acceptable to the community prior to submittal to the PUC for approval on a primarily economic basis.

• The decision-making process should include input from the impacted communities from development to evaluation of the proposed project, including all parameters of importance to the community, i.e. cultural, economic, aesthetic, etc., and allow for full disclosure of risks and benefits, clearly delineated boundaries and limits, interagency cooperation and ongoing monitoring and evaluation. Most importantly, the community consultation process should give the most weight to the communities most likely to be directly impacted by the proposed facility.

• In determining where utility-scale renewable energy projects are to be sited, a community consultation process should be utilized, with greatest weight given to the members of communities that would be most heavily impacted. Communities can be further defined by ethnicity, culture, voting district, or other appropriate categories but always including geographical proximity.

• Processes should be developed to access and influence communities through leaders who are accountable to their communities. Decision-making should anticipate population growth and include planning that involves community input at all phases from development to evaluation, full disclosure of risks and benefits, clearly defined boundaries and limits, interagency cooperation and interaction with community members, and ongoing monitoring and evaluation.

• Ethical consideration should be given to whether it is socially just to overburden a community with such sites. Where unequal burden is proposed, processes should be developed that are responsive, inclusive, fair and equitable to the hosting community. The community should be provided with a full understanding of all risks and costs – health, social, economic, aesthetics, cultural – and an on-going evaluation of all needs, risks and benefits.

• Due to the overburdening of renewable energy infrastructure on the Westside, there should be clearly delineated buffer zones established in anticipation of future growth. Regional caps must be instituted to reduce unequal burden. Discussion should include potential areas of negotiation or mitigating options that permit a community to offer its resources in exchange for having needs addressed that may or may not be related directly to the burden of hosting a site. For example, the community should be considered for facilities, services, or reduced fees in exchange for accepting a site.

• Clear end-dates should be established for each project to allow the community know how long a particular project will be active within the project location. Also, a clear and fully vetted plan for how to disassemble and dispose of all project structures/connections and return the land to near pre-project status.

• Project acceptance should consider disposal of equipment and structures as they age in an acceptable manner if it cannot be recycled or reused. No remnants of the project should be evident at end-of-life of the project and not remain in, on, or under the surface of the land utilized for the project.
• Processes should be developed to establish a method to allow open spaces (without solar farms) between projects so as to not create mono-structural geographic coverage or aesthetic impacts on the surrounding community views.

• Limitation of line capacity should be addressed with community input to continue to allow or not, additional impacts of renewable energy on community socio-economic and historical impacts to the cultural and historical character of the community.

These recommendations reinforce why a community-led process could be of significant benefit to more collaborative solutions and greater trust and transparency within the community. The recent controversy over the Kahuku windfarm project, Na Pua Makani, pit community members and communities against each other – that angst has not healed yet although we are almost two years from that disturbing time. In Wai‘anae, there is already a great deal of anger over the multitude of solar farms thrust upon the community with more that have been approved and are in the process of moving forward towards build-out.

We strongly believe that taking the time now could be a win-win to allow projects to be done on a more certain schedule and achieve our common goals, rather than work in a contentious manner. This opportunity, upfront to collect informed community feedback, will assist in guiding the RFP content and will ultimately support the development of projects needed to achieve our State renewable energy goals.

We also believe that this pause in the process to allow reasonable and informed community input will deflect the government from inappropriate and unacceptable methods to create situations, however well intended, that force communities into conflict locally and with other communities. We believe that the current vetting process can be reviewed and redrafted to a more amenable process, that while not gaining total agreement on the details, at least provides the opportunity for true community input and dialogue to determine each community’s path forward.

Mahalo again for this opportunity to provide input on policy that directly impacts O‘ahu’s energy resilience and the future of all the communities on the island.

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September 1, 2021

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Attachments
HECO O‘ahu Generating Facility Map
HECO Power Facts

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West O‘ahu/Kalaeloa Clean Energy ‘Ohana
September 1, 2021
Generating Facilities
These maps show existing and planned generating facilities and the maximum potential power in megawatts (MW) they can produce.

**Firm Generation:**
Energy available on demand, which can be adjusted as needed.

**Variable Generation:**
Energy that may not always be available or controllable.

- **Biofuels**
- **Biomas**
- **Geothermal**
- **Hydro**
- **Customer-Sited Solar**
- **Grid-Scale Solar**
- **Battery Energy Storage System**
- **Waste to Energy**

**O'ahu**

![Diagram of O'ahu's generating facilities](image)

**30.5% Renewable Energy**

- **14.9%** Customer-Sited Solar
- **6.2%** Grid-Scale Solar
- **6.0%** Waste to Energy
- **3.1%** Wind
- **0.5%** Biofuels

**Renewable Mix**

- **73.0%** Renewable Peak
  - May 22, 2020
### Power Facts

Hawaiian Electric provides electricity for 95% of residents of the State of Hawai‘i on O‘ahu, Maui, Moloka‘i, Lāna‘i and Hawai‘i Island.

### 2020 Renewable Energy Percentage is 35%

#### Total Customers: 468,039

**(As of 12/31/2020)**

#### O‘AHU

<table>
<thead>
<tr>
<th>Total Customers</th>
<th>307,378</th>
</tr>
</thead>
</table>

#### Firm Generation:
- Hawaiian Electric plants
- Hawaiian Electric (oil) ..... 650 MW
- Waialua (oil) .......... 500 MW
- Campbell Industrial Park (diesel) ..... 130 MW
- Schofield (biofuel/diesel) .. 50 MW

#### Independent Power Producers
- Kalaeloa Partners (oil) ..... 208 MW
- AES-Hawai‘i (coal) ..... 180 MW
- HPOWER (waste-to-energy) ..... 86.5 MW
- Airport Emergency Facility (biofuel) ..... 8 MW

#### Total Firm Capacity: 1,794.5 MW

#### Deactivated Units:
- Honolulu (oil) (113 MW) ..... 0 MW

#### Variable (as-available) Generation:
- Hawaiian Electric Plant
- West Loch Solar ..... 20 MW

#### Independent Power Producers
- Kahealani Solar ..... 69 MW
- Kailua Solar ..... 49 MW
- Waipio Solar ..... 45.9 MW
- Kahealani Solar ..... 30 MW
- Wai‘anae Solar ..... 27.6 MW
- Nā Pua Makani (wind) ..... 24 MW
- Par Hawaii ..... 18.5 MW
- Lanikuhana Solar ..... 36 MW
- Island Energy Service ..... 9.6 MW
- Waianuanki Solar ..... 6.5 MW
- Aloha Solar Energy Fund One ..... 5 MW
- Aloha Solar Energy Fund Two ..... 5 MW
- Kahealani Solar Two ..... 5 MW
- Kalaeloa Renewable Energy Park (PV) ..... 5 MW
- Maaka FIT (solar) ..... 3.5 MW
- Kapaolei Sustainable Energy Park (PV) ..... 1 MW

#### Customer-sited renewable
- 513 MW
- Shared solar ..... 0.25 MW

#### In Development
- Kapani Energy Storage
  - 185 MW (565 MWh) storage only
- Mahi Solar ..... 120 MW + 480 MWh
- Kupuakua Solar ..... 60 MW + 240 MWh storage
- Ho‘ohana Solar ..... 52 MW + 208 MWh storage
- Millani Solar ..... 39 MW + 156 MWh storage
- Waialua Solar ..... 36 MW + 144 MWh storage
- Waialua Phase 2 Solar ..... 30 MW + 240 MWh storage

#### Renewables
- Barbers Point Solar ..... 15 MW
- AES West O‘ahu Solar
  - 12.5 MW + 50 MWh storage
- Mountain View Solar
  - 7 MW + 35 MWh storage
- Shared solar ..... 4.75 MW

#### Renewable Energy Percentage: 30.5%

#### Renewable peak: 73% on 5/22/2020

### HAWAI‘I ISLAND

<table>
<thead>
<tr>
<th>Total Customers</th>
<th>87,357</th>
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</thead>
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#### Firm Generation:
- Hawaiian Electric plants (oil)
- Kauhi Solar ..... 77.6 MW
- Puna Solar ..... 36.7 MW
- Kanoelakea Solar ..... 21 MW
- Waimea Solar ..... 7.5 MW
- Hill Solar ..... 5.6 MW
- Dispersed generation ..... 5 MW

#### Independent Power Producers
- Hamakua Energy (oil) ..... 60 MW
- Puna Geothermal Venture
  - 38 MW

#### Total Firm Capacity: 213.3 MW

#### Retired Units:
- Shipman (oil) (15.2 MW) ..... 0 MW

#### Variable (as-available) Generation:
- Hawaiian Electric plants
- Pu‘u‘uea Hydro ..... 3.4 MW
- Waialua Hydro ..... 1.1 MW

#### Independent Power Producers
- Pakini Nui Wind ..... 26.5 MW
- Waialua River Hydro ..... 12.1 MW
- Hawai‘i Renewable Development (wind)
  - 10.5 MW

#### Customer-sited renewable
- 107 MW
- Shared solar ..... 0.75 MW

#### Approximate non-firm capacity: 155.4 MW

#### In Development
- Puako Solar
  - 60 MW + 240 MWh storage
- AES Waikoloa Solar
  - 30 MW + 120 MWh storage
- Haleiwa Solar
  - 30 MW + 120 MWh storage
- Waikoloa Solar ..... 30 MW
- Hu Honua (biomass)
  - 21.5 MW
- Keahole battery Energy Storage
  - 12 MW (12 MWh) storage only
- Shared solar ..... 1 MW

#### Renewable Energy Percentage: 43.4%

#### Renewable peak: 77% on 3/28/2020

### MAUI COUNTY

<table>
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<tr>
<th>Total Customers</th>
<th>73,304</th>
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#### Firm Generation:
- Hawaiian Electric plants (oil)
- Mā‘alaea ..... 212.1 MW
- Kahului ..... 37.6 MW
- Moloka‘i ..... 12 MW
- Lāna‘i ..... 9.4 MW
- Hāna (dispersed generation) ..... 2 MW

#### Total Firm Capacity: 273.1 MW

#### Variable (as-available) Generation:
- Independent Power Producers
- Kaheawai Wind Farm One ..... 30 MW
- Kaheawai Wind Farm Two ..... 21 MW
- Auwahi Wind Farm ..... 21 MW
- Kūlīa Solar ..... 2.9 MW
- South Maui Renewable Resources (solar) ..... 2.9 MW
- Lāna‘i Sustainability Research (solar) ..... 1.2 MW

#### Customer-sited renewable
- 120.2 MW
- Shared solar ..... 0.28 MW

#### Approximate non-firm capacity: 198.5 MW

#### In Development
- AES Kūhetani Solar
  - 60 MW + 240 MWh storage
- Kīhano Solar ..... 40 MW + 160 MWh storage
- Pūlehu Solar ..... 40 MW + 160 MWh storage
- Waeru Battery
  - 40 MW (160 MWh) storage only
- Kahana Solar
  - 20 MW + 80 MWh storage
- Paeahu Solar
  - 15 MW + 60 MWh storage
- Shared solar ..... 1.5 MW

#### Renewable Energy Percentage: 50.8%

#### Renewable peak: 89.5% on 4/29/2020

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**Generation capacity, in gross megawatts, in service as of 03/31/2021.**

* Renewable energy percentages as defined by Hawaii Revised Statutes 269-91.

** Customer-sited generation includes Feed-in-Tariff (Tiers 142), Standard Interconnection Agreement, Net Metering and other programs.

For projects pending approval or contracts, visit: [hawaiianelectric.com/statusboard](http://hawaiianelectric.com/statusboard)
The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Document Management System (DMS).