BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAI‘I

In the Matter of the Application of	)	
HAWAIIAN ELECTRIC COMPANY, INC. HAWAI‘I ELECTRIC LIGHT COMPANY, INC. MAUI ELECTRIC COMPANY, LIMITED Dba HAWAIIAN ELECTRIC	)	DOCKET NO.
For Approval of Stipulated Comprehensive Double Pole Removal Plan	)	

HAWAIIAN ELECTRIC APPLICATION

VERIFICATION

EXHIBITS “A” – “E”

AND

CERTIFICATE OF SERVICE

Rudy Tamayo
Vice President, Energy Delivery
Hawaiian Electric Company, Inc.

P. O. Box 2750
Honolulu, Hawai‘i 96840-0001

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APPLICATION

TO THE HONORABLE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAI‘I:

Hawaiian Electric Company, Inc. (“Hawaiian Electric Company”), Maui Electric Company, Limited (“Maui Electric”), and Hawai‘i Electric Light Company, Inc. (“Hawai‘i Electric Light”) (hereinafter collectively “Hawaiian Electric” or the “Company”)[1] respectfully request that the Hawai‘i Public Utilities Commission (“Commission”) approve the Stipulated Comprehensive Double Pole Removal Plan (“Stipulated Plan”) stipulated to and developed by Hawaiian Electric, with the support of participating stakeholders, pursuant to the Commission’s

[1] Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai‘i Electric Light Company, Inc. are each doing business as “Hawaiian Electric” and have jointly registered “Hawaiian Electric” as a trade name with the State of Hawai‘i Department of Commerce and Consumer Affairs, as evidenced by Certificate of Registration No. 4235929, dated December 20, 2019.

Report to the Legislature Pursuant to House Concurrent Resolution 41 / House Resolution 45 (2023) ("Legislative Status Update Report").[2]

I. EXECUTIVE SUMMARY

Across the State of Hawai'i, Hawaiian Electric owns an estimated 168,206 utility poles, which support electricity distribution as well as provide the infrastructure for telecommunications service providers to distribute internet, telephone, cable television, and street and traffic light services. In many instances an older pole is adjacent to a newer, replacement pole because lines and equipment from the older pole have not yet been transferred to the newer pole. These types of poles are commonly referred to as "double poles." Double poles may impose unnecessary burdens on Hawai'i's existing infrastructure and can be unsightly. Despite commitments made to timely remove these double poles, there has been a lack of coordination between Hawaiian Electric and the other Stakeholders[3] with regard to the removal process. This issue was complicated further by funding constraints and operational inefficiencies among the Parties, and thus not as many double poles were removed as originally contemplated.

As a result, during the 2023 Legislative Session of the Thirty-Second Legislature of the State of Hawai'i, House Concurrent Resolution 41 ("HCR41") was adopted on May 5, 2023, to urge the Commission "to open a new proceeding relating to the removal of abandoned lines,

[2] *See* Legislative Status Update Report, page ii.
[3] Pole owners and entities other than Hawaiian Electric that attach equipment to poles are collectively referred to as "Stakeholders," (*Id.,* page i) and the Stakeholders and Hawaiian Electric are collectively referred to as the "Parties" to the Stipulated Plan.

double poles, and equipment" and "submit a status report of the new proceeding to the Legislature no later than twenty days prior to the convening of the Regular Session of 2024." Similarly, on April 3, 2023, House Resolution 45 ("HR45") was adopted urging the Commission "to reevaluate and adopt administrative rules relating to the removal of abandoned lines, double poles, and equipment" and "to adopt updated provisions of the National Electrical Safety Code to streamline the removal of double poles and other unsafe abandoned equipment." To address both resolutions the Commission submitted its Legislative Status Update Report and requested that Hawaiian Electric schedule and organize meetings with Stakeholders to discuss and collaborate to improve the double pole process. Starting in December, 2023, various meetings were held between the Commission, the Consumer Advocate, Hawaiian Electric, the Stakeholders, and certain union representatives[4] to better understand the challenges and to brainstorm new opportunities in transferring and removing double poles. The result of the combined efforts is the Stipulated Plan, which addresses the administration and removal of existing and new double poles in Hawai‘i.

The stipulated improvements to the double pole process will promote clarity in day-to-day transfer and removal activities, better communication among the Stakeholders and Hawaiian Electric, efficiency gains by sharing contractors out in the field, and more accountability and transparent reporting on a going forward basis.

[4] Representatives from IBEW Local 1260 participated in certain meetings.

II. APPLICANTS

Hawaiian Electric, whose principal place of business and whose executive offices are located at 1099 Alakea Street, Suite 2200, Honolulu, Hawai‘i, is a corporation duly organized under the laws of the Kingdom of Hawai‘i on or about October 13, 1891, and now exists under and by virtue of the laws of the State of Hawai‘i. Hawaiian Electric is an operating public utility engaged in the production, purchase, transmission, distribution, and sale of electricity on the island of O‘ahu.

Hawai‘i Electric Light, whose principal place of business and administrative offices are located at 1200 Kilauea Avenue, Hilo, Hawai‘i, is a corporation duly organized under the laws of the Republic of Hawai‘i on or about December 5, 1894, and now exists under and by virtue of the laws of the State of Hawai‘i. Hawai‘i Electric Light is an operating public utility engaged in the production, purchase, transmission, distribution, and sale of electricity on the island of Hawai‘i.

Maui Electric, whose principal place of business and administrative offices are located at 210 West Kamehameha Avenue, Kahului, Hawai‘i, is a corporation duly organized under the laws of the Territory of Hawai‘i on or about April 28, 1921, and now exists under and by virtue of the laws of the State of Hawai‘i. Maui Electric is an operating public utility engaged in the production, purchase, transmission, distribution, and sale of electricity on the islands of Maui, Lāna‘i and Moloka‘i.

III. PARTICIPATING STAKEHOLDERS

The Stakeholders are comprised of both joint pole owners and telecommunications and cable attachers, some of whom are not regulated by the Commission. The government entities—

the City & County of Honolulu and the State of Hawai‘i, Department of Transportation—both remain minority joint pole owners and are in a co-ownership relationship with Hawaiian Electric.[5] The remainder of the Stakeholders are telecommunications and cable providers that attach to Hawaiian Electric's distribution poles via the mechanisms set forth in the Federal Pole Attachment Act, the Federal Communications Commission's regulations, and via their respective pole licensing agreements with Hawaiian Electric. The participating Stakeholders are as follows:

i. City and County of Honolulu ("C&C")

ii. State of Hawai‘i, Department of Transportation ("DOT")

iii. Hawaiian Telcom, Inc. ("HT")

iv. Spectrum Oceanic, LLC ("Charter")

v. Cellco Partnership D/B/A Verizon Wireless ("Verizon")

vi. AT&T Corp.

vii. New Cingular Wireless PCS, LLC ("AT&T Mobility")

IV. CORRESPONDENCE AND COMMUNICATIONS

Correspondence and communications regarding this Application should be addressed to:

Kevin M. Katsura
Director, Regulatory Non-Rate Proceedings
Hawaiian Electric Company, Inc.
P. O. Box 2750
Honolulu, Hawai‘i 96840-0001
kevin.katsura@hawaiianelectric.com

[5] The County of Maui is not a joint pole owner and does not own any equipment attached to Hawaiian Electric poles, so was not a stakeholder in this exercise. The County of Hawai‘i ("COH") is a joint pole owner, but Hawaiian Electric has a long-standing agreement with the COH to transfer all of the COH's streetlights when it places a new pole, so it was not a necessary participant in these discussions.

richard.vandrunen@hawaiianelectric.com
regulatory@hawaiianelectric.com

V. STATUTORY PROVISION OR AUTHORITY

This Application is filed pursuant to §269-6 of the Hawai‘i Revised Statutes ("HRS"), and §§16-601-74 of the *Rules of Practice and Procedure Before the Public Utilities Commission*, Title 16, Chapter 601 of the Hawai‘i Administrative Rules, and the Commission's Legislative Status Update Report, at page ii, issued December 2023 (Exhibit A).

VI. EXHIBITS

The following exhibits are provided in support of this Application:

Exhibit A - Commission Report to the 2024 Legislature Pursuant to House Concurrent Resolution 41 / House Resolution 45 (2023)

Exhibit B - Stipulated Comprehensive Double Pole Removal Plan ("Stipulated Plan")

Exhibit C - Hawaiian Electric's Double Pole Removal Plans and Comments

Exhibit D - Hawaiian Telcom Double Pole Removal Plans

Exhibit E - C&C Comments

VII. BACKGROUND

A double pole occurs when Hawaiian Electric installs a new, replacement utility pole next to an old pole but cannot immediately remove the old pole because telecommunications lines, other telecommunications equipment, and/or streetlights are attached to the old pole and have not been transferred to the new pole by their owners. The result is that two poles remain in the same location creating a double pole. A double pole remains in place until all attachments owned by Stakeholders are transferred to the new pole and the old pole is removed.

Hawaiian Electric and HT agreed to ensure removal of all double poles that existed in the field in 2018 at the time of the asset transfer of the communication space previously owned and managed by HT to Hawaiian Electric, within ten years, as part of Docket No. 2018-0075. Double poles identified, in part, by a 2018 audit are referred to as "backlog" double poles. Originally the audit by a third-party contractor described in Docket No. 2018-0075 focused on O'ahu first. Of the 12,100 O'ahu backlog double poles initially identified from Hawaiian Electric's records, the audit identified 6,300 backlog HT standard transfer double poles to be addressed by Hawaiian Electric and 2,100 backlog HT non-standard transfer double poles to be addressed by HT. 3,700 backlog double poles were confirmed to not be double poles in the field. A similar audit was performed by internal crews for Hawai'i and resulted in an estimated 1,800 backlog HT standard transfer double poles to be addressed by Hawaiian Electric and 500 backlog HT non-standard transfer double poles to be addressed Hawaiian Telcom. On Maui, no audit was performed as it was later determined that existing records would be used, which resulted in an estimated 1,300 backlog HT standard transfer double poles to be addressed by Hawaiian Electric and 300 backlog HT non-standard transfer double poles to be addressed by Hawaiian Telcom. Hawaiian Electric agreed to remove double poles that require HT "standard" equipment transfers and HT agreed to remove double poles that require HT "non-standard" transfers (see footnote 3 to Exhibit B for a description of transfer types). Neither Hawaiian Electric's nor HT's commitment included removal of double poles created after the 2018 audit, which are double poles created on a going forward and continual basis whenever existing poles are replaced due to planned or unplanned maintenance and telecom attachments are not transferred over. These are referred to as "preventive" double poles and contribute to the double pole problem as well.

Certain efficiency gains that the Stakeholders have agreed to will help prevent a double pole from existing in the first place and are designed to streamline the removal of any double poles created.

From 2018 to 2023, Hawaiian Electric and HT were removing double poles but were behind in their progress. In early 2023, it was believed that 6,900 standard transfers and 2,900 non-standard transfers remained to be removed and neither party seemed to be on track. Recognizing the slower pace of removals, the negative aesthetics, and possible infrastructure and safety concerns, the Hawai‘i State Legislature introduced two resolutions in its 2023 Session urging the Commission to open a new proceeding relating to the removal of abandoned or double utility poles, lines, and equipment (See, HCR 41),[6] and to reevaluate and adopt administrative rules relating to the removal of abandoned or double utility poles, lines, and equipment (See, HR 45).[7]

The Commission's report primarily spoke to the desire to resolve the issues set out in HCR 41. From July 2023 to December 2023, the Commission worked with the Parties to better understand the status of double pole removals outside of a docketed proceeding. The Commission held several meetings with Hawaiian Electric to learn more about the challenges it faces removing double poles, requested data from Hawaiian Electric on the current number of double poles, and required Hawaiian Electric to organize a status update meeting. On December 11, 2023, the Commission, the Consumer Advocate, Hawaiian Electric, Hawaiian Telcom, the

[6] HCR41_SD1_.pdf (hawaii.gov)
[7] HR45_.pdf (hawaii.gov)

State Department of Transportation, the City and County of Honolulu, Verizon, AT&T Corp., AT&T Mobility and Charter attended a status update meeting held in the Commission's hearing room. Since then, Hawaiian Electric, the Commission, the Consumer Advocate and the Stakeholders have met four times in Double Pole Status Update Meetings and Hawaiian Electric, the Consumer Advocate and the Stakeholders formed two subcommittees who have met 13 times, with additional meetings between Hawaiian Electric and individual stakeholders. Table 1 provides the dates of collaborative discussions.

Table 1 – Schedule of Collaborative Discussions

Meeting Type	Date
Status Meeting	February 5, 2024
Subcommittee Meeting	February 13, 2024
Subcommittee Meeting	February 16, 2024
Subcommittee Meeting	February 20, 2024
Subcommittee Meeting	February 21, 2024
Subcommittee Meeting	February 23, 2024
Status Meeting	February 26, 2024
Subcommittee Meeting	February 27, 2024
Subcommittee Meeting	March 1, 2024
Subcommittee Meeting	March 12, 2024
Status Meeting	March 18, 2024
Subcommittee Meeting	March 28, 2024
Subcommittee Meeting	April 4, 2024
Status Meeting	April 8, 2024
Subcommittee Meeting	April 11, 2024
Subcommittee Meeting	April 18, 2024
Subcommittee Meeting	April 25, 2024

The result of such meetings is the Stipulated Plan and short-term and long-term plans from Hawaiian Electric and applicable Stakeholders most impacted. A summary of those plans is provided below, and the details are provided in Exhibits C-E. As of today, Hawaiian Electric has removed 3,338 backlog standard transfers., and HT has removed 549 non-standard transfers. The stipulated improvements to the double pole process will facilitate a faster rate of removals in a more collaborative and efficient process among the Parties.

VIII. SUMMARY OF THE STIPULATED PLAN FOR REMOVAL OF DOUBLE POLES

The Parties have agreed to sixteen specific stipulations that are described in detail in Exhibit B. Below is a summary of the key stipulations that the Parties believe to be the most impactful to improving the efficiency and rate of double pole removals.

1) Agree to the concept of using Alden ONE, an online portal and database software tool to be shared among the Parties in order to facilitate efficient communication and tracking related to all steps of double pole creation and removals. Specifically, this is intended to improve and automate notices related for: 1) scheduling of transfers, 2) completion notices, 3), customer complaints, 4) joint permit progress, 5) timeline tracking, 6) dashboard-style reporting, and any other communication the Parties discover and agree to as necessary to address double poles.
2) Use of shared contractors and certain union crews, where possible, using a "One Touch" concept whereby qualified contractors and certain union crews will be able to transfer several Stakeholders' equipment from the old pole to the new pole. This can minimize the number of different contractors that need to schedule and perform

transfer work on a specific pole and limit how many times contractors or union crews go to that pole, thereby accelerating the pace of transfers and removals.

3) Greater coordination between HT and Charter on performing non-standard transfers, including: 1) improvements to installing cross-arms, 2) submitting joint permits to C&C when risers or other equipment require a permit to relocate, a new method to obtain pre-clearance approvals when trenching is required, which should speed up the permitting process.

4) Tagging of new and existing equipment so the Parties, qualified contractors and union crews, and the public can readily identify what equipment belongs to whom. This is important for contacting necessary Stakeholders in cases of emergency, for coordination of equipment transfers, and for reporting and/or invoicing once transfers are complete.

5) Removal of abandoned cables and equipment once taken out of service , and an agreement by the Stakeholders to not knowingly transfer abandoned cables as part of the double pole transfer process.

IX. REQUESTED RELIEF

WHEREFORE, the Hawaiian Electric Companies request that the Commission:

(1) Approve the Stipulated Plan, included as Exhibit B, herein.

(2) Grant the Companies such other and further relief as may be just and equitable under the circumstances.

DATED: Honolulu, Hawai‘i, April 30, 2024.

HAWAIIAN ELECTRIC COMPANY, INC.
HAWAI‘I ELECTRIC LIGHT COMPANY, INC.
MAUI ELECTRIC COMPANY, LIMITED

By /s/ Rudy Tamayo

Rudy Tamayo
Vice President, Energy Delivery
Hawaiian Electric Company, Inc.

VERIFICATION

STATE OF HAWAIʻI)
) ss.
CITY AND COUNTY OF HONOLULU)

RUDY TAMAYO, being first duly sworn, deposes and says: That he is Vice President, Energy Delivery of Hawaiian Electric Company, Inc., Hawaiʻi Electric Light Company, Inc., and Māui Electric Company, Limited, Applicants in the above proceeding; that he makes this verification for and on behalf of said Applicants, and is authorized so to do; that he has read the foregoing Application, and knows the contents thereof; and that the same are true of his own knowledge except as to matters stated on information or belief, and that as to those matters he believes them to be true.

/s/ Rudy Tamayo

Rudy Tamayo

STATE OF HAWAII

PUBLIC UTILITIES COMMISSION

Report to the 2024 Legislature Pursuant to House Concurrent Resolution 41 / House Resolution 45 (2023)

December 2023

Executive Summary

Across the State of Hawaii, Hawaiian Electric owns an estimated 120,000 utility poles, which support electricity distribution to households and businesses as well as provide the infrastructure for service providers to distribute internet, telephone, cable television, and street and traffic lights. In thousands of instances there is a duplicate, redundant pole adjacent to a newer, replacement pole. The duplicate pole is commonly referred to as a "double pole".

Double poles impose unnecessary burdens on Hawaii's existing infrastructure and are unsightly. A double pole occurs when Hawaiian Electric, composed of Hawaiian Electric Company ("HECO"), Hawaii Electric Light Company ("HELCO"), and Maui Electric Company ("MECO"), installs a new, replacement utility pole next to an old pole but cannot immediately remove the old pole. This typically occurs because lines and infrastructure are attached to an old pole and have not been transferred by their owners, which are pole owners and entities other than Hawaiian Electric that attach equipment to poles (collectively referred to as "Stakeholders"), to new poles when they are installed. The result is two poles erected in the same location – a double pole. A double pole remains in place until all attachments owned by Stakeholders are transferred to the new pole and the old pole is removed.

Hawaiian Electric agreed to ensure removal of all double poles that were identified in a 2018 audit by 2028, pursuant to a Decision and Order issued by the Public Utilities Commission ("Commission" or "PUC") in Docket No. 2018-0075.[1] Double poles identified by this audit are referred to as "backlog" poles. Currently, Hawaiian Electric is behind in its commitment to removing the backlog poles. Specifically, in 2018, Hawaiian Electric had approximately 12,300 double poles in existence, of which approximately 8,400 were in the City & County of Honolulu, 2,300 in Hawaii County, and 1,600 in Maui County (i.e., Maui, Molokai, and Lanai). As of November 2, 2023, the backlog remains at 10,782 double poles (of the original 12,300 double poles) statewide. This backlog is comprised of 6,920 double poles that require standard equipment transfers and 3,862 that require non-standard transfers (see Section 3 for a description of transfer types). Hawaiian Electric's commitment does not include double poles created after the 2018 audit and that are created on a continual basis whenever existing poles are replaced due to planned or unplanned maintenance. These are referred to as "post-audit" poles.

Recognizing this important issue, including the safety risks to Hawaii's residents and businesses that neglected double poles can pose, the Hawaii State Legislature introduced two resolutions in its 2023 Session urging the Commission to open a new proceeding relating to the removal of abandoned or double utility poles, lines, and equipment (See, HCR 41), and to reevaluate and adopt administrative rules relating to the removal of abandoned or double utility poles, lines, and equipment (See, HR 45).

This report provides updates on this issue to the Hawaii State Legislature ahead of its 2024 Legislative Session. Since the adoption of HCR 41 and HR 45, the PUC has collaboratively and constructively engaged Hawaiian Electric on the issue of double pole removal on a non-docketed basis. In response to these resolutions, over the last seven months, the PUC held several meetings with Hawaiian Electric to learn more about the challenges it faces removing double poles, requested data from Hawaiian Electric on the current number of double poles, and required Hawaiian Electric to organize a status update meeting. On December 11, 2023, Hawaiian Electric, the Commission, the Consumer Advocate, and the Stakeholders

[1] See Order No. 35768, October 16, 2018, Docket No. 2018-0075, at page 62.

attended a status update meeting held in the Commission's hearing room. At the meeting, Hawaiian Electric presented its updated pole report for 2023 (see Appendix A), its responses to Commission staff's questions (see Appendix B), and its plans to ensure the removal of the current backlog of double poles by 2028.

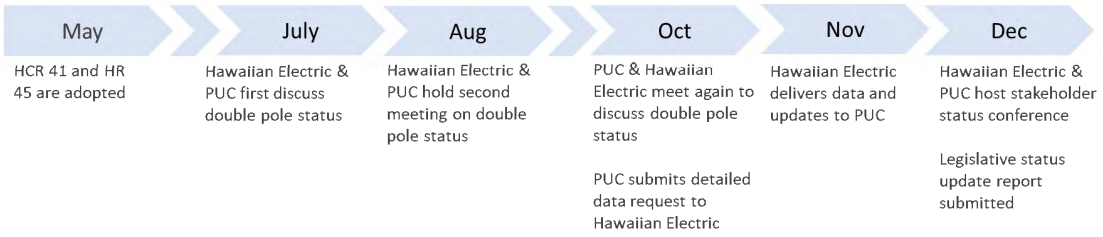

Figure 1: Timeline of PUC activities and engagement with Hawaiian Electric since end of 2023 Legislative Session to present

Engagement on double poles in a non-docketed context facilitates open exchange of information with Hawaiian Electric and Stakeholders (who may be non-regulated entities) and allows the PUC flexibility to work with Hawaiian Electric to better understand the issue.

The Commission, together with Hawaiian Electric, will convene additional monthly status meetings with Stakeholders in the coming months to ensure alignment on a comprehensive plan that addresses the removal of the backlog of double poles (from the 2018 audit) and the timely removal of post-audit double poles newly created since 2018. Through regular discussions with Hawaiian Electric, the Commission is learning which solutions (an updated tracking system, incentive or penalty program, contractor training program, addendums to all agreements for pole attachments, stronger contract enforcement, increased contractor capacity, etc.) are best suited for accelerating removal of Hawaiian Electric's double poles. The Commission will require the Stakeholders to submit their stipulated comprehensive plan in a docket by the end of April 2024, after which the Commission intends to review and render a decision on this comprehensive plan by end of July 2024.

If members of the Hawaii State Legislature are interested, the Commission, Hawaiian Electric, and the Stakeholders are available to brief members on this issue.

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1 Introduction

The Hawaii State Legislature ("Legislature") adopted two resolutions relating to the removal of double utility poles during the 2023 Legislative Session through the regulatory authority of the Public Utilities Commission:

- **House Concurrent Resolution 41 (HCR 41)**: Urging the Public Utilities Commission to Open a New Proceeding Relating to the Removal of Abandoned or Double Utility Poles, Lines, and Equipment.[2]
- **House Resolution 45 (HR 45)**: Urging the Public Utilities Commission to Reevaluate and Adopt Administrative Rules Relating to the Removal of Abandoned or Double Utility Poles, Lines, and Equipment.[3]

The Commission appreciates the Legislature's attention to this important issue and is committed to timely removal of retired utility poles.

This report summarizes the Commission's recent activities and provides context on ongoing and future actions related to the above resolutions. The report also addresses the resolutions' requests that the Commission:

1. Open a new proceeding relating to the removal of abandoned lines, double poles, and equipment;[4]
2. Reevaluate and adopt administrative rules relating to the removal of abandoned lines, double poles, and equipment;[5] and
3. Adopt updated provisions of the National Electrical Safety Code (NESC) to streamline the removal of double poles and other unsafe abandoned equipment.[6]

The report concludes with next steps regarding this issue, along with an offer from the Commission to convene with Hawaiian Electric and the Stakeholders to hold a briefing for members of the Legislature on this issue.

2 Legislative background and engagement with Hawaiian Electric

2.1 History and background

The Commission has a long history of regulating utility overhead lines in Hawaii. The Commission first adopted rules for Overhead Line Construction on June 12, 1953, within a quorum meeting, notifying applicable parties via a letter on July 14, 1953, of the adoption of certain provisions of the then California Railroad Commission's General Order No. 95.[7] The Commission's adopted rules, General Order No. 6, applied to "[a]ll future overhead line construction by public utilities in the Territory of Hawaii." General Order No. 6 was amended twice in subsequent years on September 21, 1962 (Docket No. 1500 / Docket No. 1963-0014) and on June 20, 1963 (Docket No. 1541 / Docket No. 1963-0017). Upon completion and

[2] H. Con. Res. 41, Senate Draft 1, Haw. 32nd Leg. (2023) ("HCR 41").
[3] H. Res. 45, Haw. 32nd Leg. (2023) ("HR 45").
[4] HCR 41.
[5] HR 45.
[6] HR 45.
[7] See Docket No. 1178 (filed in the Commission's Case and Docket Management System as Docket No. 1952-0029), Document Set 1, at PDF page 247.

adoption by the Commission of HAR 6-73 on April 23, 2007, all future (April 23, 2007, and forward) installation, operation, and maintenance of overhead and underground electrical supply and communication lines follow this administrative rule.[8] HAR § 6-73 governs the construction of overhead and underground lines for Hawaii.

Following adoption of HAR § 6-73, several legislative acts (Act 151 SLH 2011, Act 264 SLH 2013, Act 193 SLH 2016) clarified that broadband and telecom companies are required to adhere to "applicable safety and engineering requirements" and that existing utility poles do not have to be replaced if the "overall weight load on the utility pole does not exceed maximum utility pole safe weight capacities."[9]

On April 4, 2018, Hawaiian Telcom and Hawaiian Electric requested approval from the Commission that Hawaiian Electric take sole ownership of their jointly owned poles.[10] In its application, Hawaiian Electric acknowledged the existence of over 10,000 double poles across its territories (called "backlog" double poles) and later committed to removing a minimum of 1,000 backlog double poles requiring standard transfers per year; Hawaiian Telcom committed to removing a minimum of 50 backlog double poles requiring non-standard transfers per year (see Section 3 for a description of transfer types).[11] Hawaiian Electric also committed to clearing the backlog of double poles within ten years.[12] The Commission approved the transfer of ownership acknowledging the benefits of the pole removal commitments and imposed the condition that Hawaiian Electric file an annual report for 10 years on revenues, incremental operation and maintenance costs, depreciation, and authorized return.[13]

On February 6, 2019, Hawaiian Electric requested approval of a newly proposed standard template for a Master License Agreement ("MLA") for pole attachments as well as approval of four licensing agreements between Hawaiian Electric and four non-incumbent telecommunications carriers.[14] The Commission approved Hawaiian Electric's alternative request to approve the individually signed MLAs requiring Hawaiian Electric to file annual reports detailing ancillary revenues, file quarterly status reports with certain additional information, and file the executed licensing agreements.[15]

During the 2023 Legislative Session of the Thirty-Second Legislature of the State of Hawaii, HCR 41 and HR 45 were adopted on May 5, 2023, and April 3, 2023, respectively.[16] From July 2023 to December 2023, the Commission worked with Hawaiian Electric and the Stakeholders to better understand the status of double pole removals outside of a docketed proceeding. The PUC held several meetings with Hawaiian

[8] HAR 6-73 implies inclusion of utility poles which are the infrastructure elements that support the overhead electrical supply and communication lines.

[9] See Act 264 SLH 2013 which added the applicable language to Act 151. See Act 193 SLH 2016 which eliminated the sunset date of Act 151.

[10] See "Application of Hawaiian Telcom, Inc. and Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc. and Maui Electric Company, Limited, Verification Exhibits A-F and Certificate of Service" ("Application"), Docket No. 2018-0075, filed April 4, 2018, age 23.

[11] See Application at page 23.

[12] See Application at page 23.

[13] See Order No. 35768, Docket No. 2018-0075, filed October 16, 2018, at 74.

[14] See "Application of Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc. and Maui Electric Company, Limited, Verification Exhibits A-F and Certificate of Service", Docket No. 2019-0032, filed February 6, 2019.

[15] See Order No. 36602, Docket No. 2019-0032, filed February 6, 2019, at 78-81.

[16] https://www.capitol.hawaii.gov/session/measure_indiv.aspx?billtype=HCR&billnumber=41&year=2023. https://www.capitol.hawaii.gov/session/measure_indiv.aspx?billtype=HR&billnumber=45&year=2023.

Electric to learn more about the challenges it faces removing double poles, requested data from Hawaiian Electric on the current number of double poles, and required Hawaiian Electric to organize a status update meeting. On December 11, 2023, Hawaiian Electric, the Commission, the Consumer Advocate, and the Stakeholders attended a status update meeting held in the Commission's hearing room (see Appendix C for a list of attendees). The nature of this status update meeting is discussed in the next section.

The Commission agrees with the Legislature's efforts to address the issue of double poles and with the Legislature's request to open a new proceeding relating to the removal of abandoned lines, double poles, and equipment. Following further informal monthly meetings, the Commission intends to resolve the issue within a docketed context to ensure Hawaiian Electric and the Stakeholders establish an effective plan for removing double poles and all other abandoned lines and equipment.

In developing this report, the Commission considered several comments from Senators on the Committee on Commerce and Consumer Protection regarding what any proceeding should consider: benchmarks for replacements; development of novel programs, such as allowing third party private entities not contracted by Hawaiian Electric to remove poles at their own cost; providing a status update on the current program; and allowing for public engagement through conferences hosted by the Commission.

The Commission is currently assessing if the adoption of updated provisions of the 2023 NESC is necessary to streamline the removal of double poles and other abandoned equipment. Although adopting additional administrative rules, or revising current rules, related to the NESC would serve to reinforce that abandoned equipment should be removed, doing so may not expedite[17] the double pole removal process. Rather, the Commission will focus its efforts on working with Hawaiian Electric and Stakeholders to establish a clear plan for removing existing and future double poles, and on opening a proceeding on the double pole removal process improvements to meet the intent of HCR 41 and HR 45.

2.2 Timeline of meetings held through December 2023

After the close of the 2023 Legislative Session, Commission staff met with Hawaiian Electric in July 2023 to discuss a plan going forward to address the Legislature's concerns. This was followed by a meeting on August 30, 2023, that focused on the status of Hawaiian Electric's efforts, the potential for NESC updates to the Commission's HAR 6-73, and what process should be used to address HCR 41 and HR 45. Commission staff subsequently met with Hawaiian Electric on October 19, 2023, to discuss double pole related data, the current double pole removal process, the effectiveness of the current process, and how to further address HCR 41 and HR 45. Figure 1 provides an illustration of the actions the Commission has taken since HCR 41 and HR 45 were adopted in May through the end of 2023.[18]

[17] The rulemaking procedure of adopting new provisions in the Hawaii Administrative Rules tends to be a lengthy process, involving several state agencies and public hearings.

[18] It is worth noting that the devastating wildfire disaster in Lahaina necessitated a reallocation of staff resources both within the PUC and at Hawaiian Electric that resulted in delayed follow-ups to the August meeting. The Lahaina wildfires reinforced the need to harden the electric grid and ensure that it is designed and operating safely, aligned with the objectives of this effort.

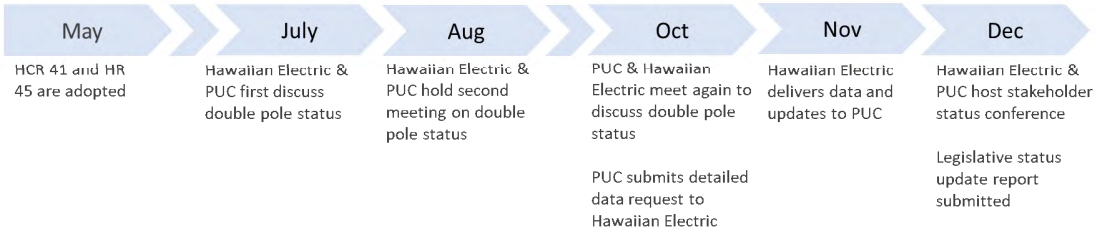

Figure 1: Timeline of PUC activities and engagement with Hawaiian Electric since end of 2023 Legislative Session

In addition to direct engagement with Hawaiian Electric, the Commission requested that Hawaiian Electric hold a status update meeting with the Stakeholders on December 11, 2023. Hawaiian Electric prepared the status update meeting agenda with general guidance from Commission staff, invited the Stakeholders, and facilitated the meeting. The following Stakeholders attended the meeting: Hawaiian Electric, Hawaiian Telcom, the Consumer Advocate, State Department of Transportation, the City & County of Honolulu, Verizon, AT&T, and Charter Spectrum (Refer to Appendix C - Attendance Summary from December 11, 2023, Status Update Meeting). The meeting was conducted in a hybrid setting, which was publicly accessible in person and on YouTube.

The status update meeting served several purposes, including but not limited to, allowing the exchange of information among the Stakeholders. Hawaiian Electric presented baseline information from the updated "2023 Double Pole Removal Update" report (attached Appendix A), providing context on the challenges they face removing double poles. The Stakeholders, such as Hawaiian Telcom and Charter Spectrum, provided feedback on their experience working with Hawaiian Electric and on possible process improvements. All participants offered and discussed numerous ideas on how to change the current process to ensure they meet the committed removal of double poles by 2028, as agreed to in Docket No. 2018-0075. During the meeting, the Stakeholders reaffirmed their shared commitments to eliminating the backlog of double poles and committed to continuing to meet to address the issue.

3 Current status and challenges of double pole removal

3.1 Overview of double pole types

There are three different types of double poles depending on the nature of the equipment removal and/or the type of process needed to transfer (move) the attachments to the new pole: (1) double poles requiring standard transfers; (2) double poles requiring non-standard transfers; and (3) "other" double poles that may be in the midst of a transfer or have no attached equipment remaining at all and are ready for removal. The type of double pole affects the removal rate and the amount of coordination required to do so. Where a double pole exists, there will typically be a shorter "topped" pole and a taller new pole. After Hawaiian Electric has transferred all its equipment as well as other equipment it is authorized to move to the new pole, Hawaiian Electric will then cut off the top portion of the former pole, leaving this "topped" pole in place to allow Stakeholders to transfer their equipment to the new pole before the "topped" pole can be removed. Removing the top portion of the pole improves safety by reducing the possibility of contact with energized electrical lines.

Standard transfers specifically allow Hawaiian Electric to utilize Hawaiian Telcom-authorized vendors to transfer Hawaiian Telcom equipment from the former pole to the new pole. Standard transfers utilize

materials provided by Hawaiian Telcom and do not normally involve any service disruptions. Hawaiian Electric removes the old pole once all pole attachments are transferred to the new pole; if only Hawaiian Telcom's equipment needs to be moved, Hawaiian Electric is then responsible for removing the old pole.

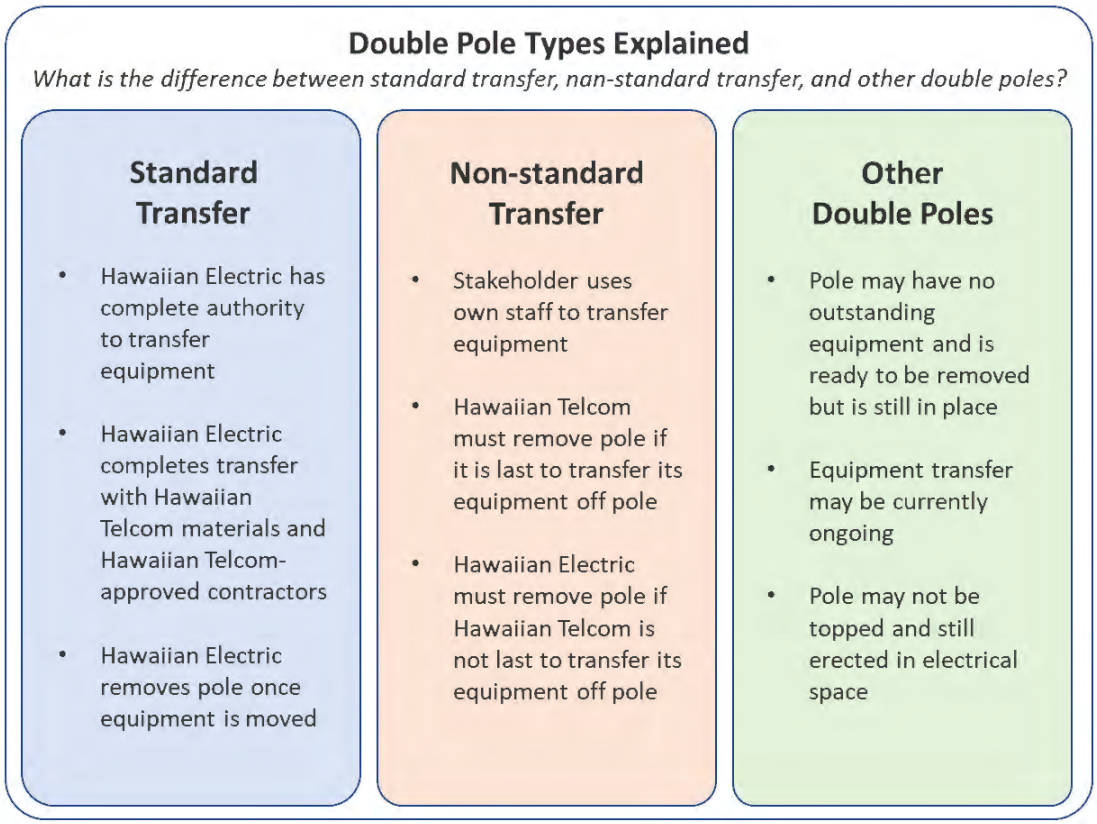

Figure 2: Double pole types explained

Non-standard transfers require Hawaiian Telcom (as well as County, State, and other Stakeholders) to utilize its own staff to move its complex equipment from the old to the new pole. Non-standard transfers may involve additional coordination with the electric utility so that the utility can arrange for backup power to avoid service disruptions to its customers. For non-standard transfers, Hawaiian Telcom is responsible for removing the old pole if it is the last Stakeholder remaining on the old pole. Conversely, Hawaiian Electric is responsible for removing the old pole if Hawaiian Telcom is not the last Stakeholder with equipment on the pole – for example, if other lessees' attachments are still on the old poles and have not been transferred. Hawaiian Electric must remove all other double poles if Hawaiian Telcom is not the last Stakeholder with equipment on the pole. For more information about standard and non-standard transfers, please see Appendix A.

In instances where a Stakeholder other than Hawaiian Telcom has equipment attached to a pole, Hawaiian Electric's agreements with non-Telcom attachers, including other joint pole agreements (i.e., State, City, and County), pole attachment agreements with other entities (i.e., Spectrum), and master license agreements (i.e., Verizon and AT&T), govern equipment transfer and pole removal.

Overall, 64% of backlog double poles require standard transfers and 36% of double poles require non-standard transfers. Because of the difficulty of removing double poles requiring non-standard transfers, and the larger volume of outstanding poles requiring standard transfers, to date Hawaiian Electric has focused more on removing poles requiring standard transfers than poles requiring non-standard transfers.

Hawaiian Electric prioritizes which poles it removes by categorizing them as either "high", "medium", or "low" priority. "High" priority poles are typically poles with structural integrity issues. In emergency situations, crews are dispatched to remove "high" priority poles within 24 hours. Other double pole removals in the "medium" or "low" category are typically grouped together or with other pole-related maintenance work in the vicinity to reduce travel time between jobs for crews.[19]

3.2 Current number of double poles statewide

When Hawaiian Telcom transferred ownership of its poles in 2018 to Hawaiian Electric, Hawaiian Electric estimated that there were 14,000 to 16,000 total double poles across the City & County of Honolulu, Hawaii County, and Maui County. Hawaiian Electric conducted an audit in June of that year to determine the actual number of double poles. The audit was completed in June 2018, focused on double poles in the City & County of Honolulu. The audit found that approximately 3,700 double poles had already been removed although Hawaiian Electric had not been informed of their removal. According to the audit, as of June 2018 there were approximately 8,400 total double poles in the City & County of Honolulu, 2,300 total double poles in Hawaii County, and 1,600 double poles in Maui County - an estimated 12,300 total double poles, called "backlog" double poles.[20]

As of November 2, 2023, the backlog remains at 10,782 double poles (of the original 12,300 double poles) statewide. The backlog includes 6,022 double poles requiring standard transfers, comprised of 3,855 in the City & County of Honolulu, followed by 1,149 in Hawaii County, and 1,018 in Maui County. There are 3,862 double poles requiring non-standard transfers, comprised of 2,453 in the City & County of Honolulu, 987 in Hawaii County, and 422 in Maui County. There are 898 other double poles, including 231 double poles with no equipment attached to them. Figure 3 shows the current total backlog double poles count by type and county.

While Hawaiian Electric is trying to clear the backlog of double poles, new double poles are created every year. Hawaiian Electric uses the term "preventative double poles" for such double poles created after the June 2018 audit; this report instead refers to these as "post-audit" double poles. Since June 2018, Hawaiian Electric created 5,585 post-audit double poles. In most years, Hawaiian Electric created more post-audit double poles than it removed double poles from the backlog, resulting in a net positive increase in total double poles.

Over the last five years, Hawaiian Electric reports removing 2,840 backlog double poles requiring standard transfers (1,968 in the City & County of Honolulu, 667 in Maui County, and 205 in Hawaii County). For 179 out of 6,920 backlog double poles requiring standard transfers and other types of double poles, Hawaiian Electric is waiting for confirmation that they have been removed. For the rest, the work is performed in batches and Hawaiian Electric has not yet hired or assigned a Hawaiian Telcom-approved contractor to

[19] Status update meeting, held December 11, 2023.

[20] Whenever discussing double pole counts, unless stated otherwise, the figures refer to the total double poles counted in the audit. These are also referred to as "backlog" double poles.

perform the standard transfer work. For double poles requiring non-standard transfers, Hawaiian Electric does not know how many double poles are ready to be removed by Hawaiian Electric because Hawaiian Telcom is responsible for performing the work or hiring a contractor to perform non-standard transfer work. Hawaiian Telcom, responding to questions from the Commission, noted that it had approximately 3,750 incomplete requests (2,847 in the City & County of Honolulu, 287 in Maui County, and 615 in Hawaii County).

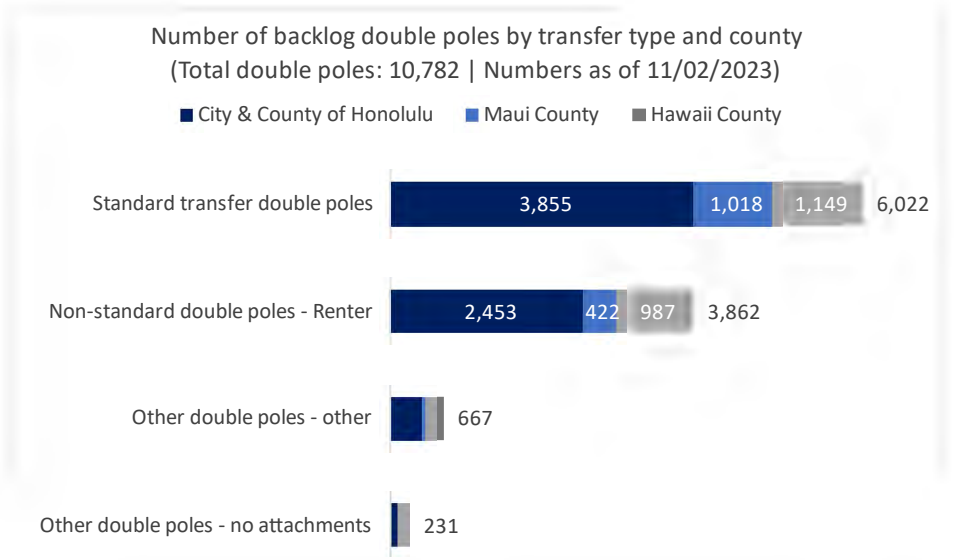

Figure 3: Backlog double poles broken out by type and county

3.3 Rate of double pole removal to date

Hawaiian Electric states that it is committed to clearing the backlog of double poles, regardless of whether they require standard or non-standard equipment transfers. However, because Hawaiian Electric does not know how many double poles requiring non-standard transfers were removed by Hawaiian Telcom so far, to date, the Commission has only received records of the number of double poles requiring standard transfers removed by Hawaiian Electric over the past five years.[21]

To meet this commitment, Hawaiian Electric must remove the backlog of double poles regardless of transfer type. Hawaiian Electric has provided a detailed commitment to remove 1,320 double poles requiring standard transfers each year for the next five years, comprising of 868 in the City & County of Honolulu, 236 in Hawaii County, and 216 in Maui County. This is an ambitious goal given that in the year that it removed the most double poles (2021), Hawaiian Electric removed 1,095 backlog double poles requiring standard transfers statewide, indicating it plans to remove more poles annually than it has done in any year since the June 2018 audit, and to do so on a consistent basis. Figure 4 shows the progression of backlog standard transfer doubles poles requiring removal between 2018 and 2028, where data for 2018 to 2023 (solid line) are based on actual removals reported by Hawaiian Electric and data for 2024 to 2028 (dotted line) are based on Hawaiian Electric's stated targeted removals.

[21] Hawaiian Electric Response to Commission Letter, provided November 30, 2023.

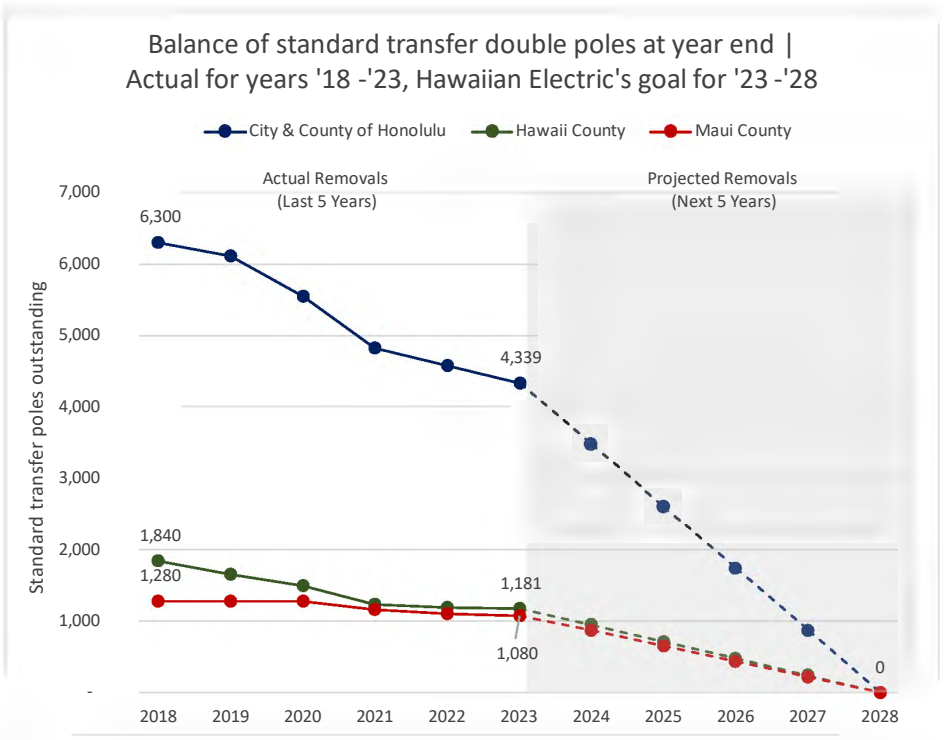

Figure 4: Number of backlog standard transfer double poles projected based on Hawaiian Electric's targeted removal rates

It is questionable whether Hawaiian Electric can meet its currently stated target of clearing the backlog of double poles – both overall as well as those requiring standard transfers - in the next five years without significant modifications to its current process. Since 2018, Hawaiian Electric removed backlog double poles requiring standard transfers at an average annual rate of 7.0% in the City & County of Honolulu, 8.3% in Hawaii County, and 3.3% in Maui County. Applying these removal rates in each county from the past five years to project the removal rates for the next five years, the Commission estimates that there would be approximately 7,300 total backlog double poles remaining in 2028, comprising of 4,650 double poles requiring standard transfers and 2,650 double poles requiring non-standard transfers (applying Hawaiian Electric's estimate that 65% of all double poles require standard transfers and the remainder require non-standard transfer[22]). Figure 5 illustrates the number of backlog doubles poles requiring standard transfers removed between 2018 and 2028, where data for 2018 to 2023 are based on actual removals reported (solid line) and data for 2024 to 2028 (dotted line) are projections based on the average annual growth rate of backlog double pole removals over the past five years.

[22] The data collected by Hawaiian Electric on non-standard transfers is far from complete and makes it challenging to determine the rate at which poles requiring non-standard transfers are removed, so a simple percentage is applied here.

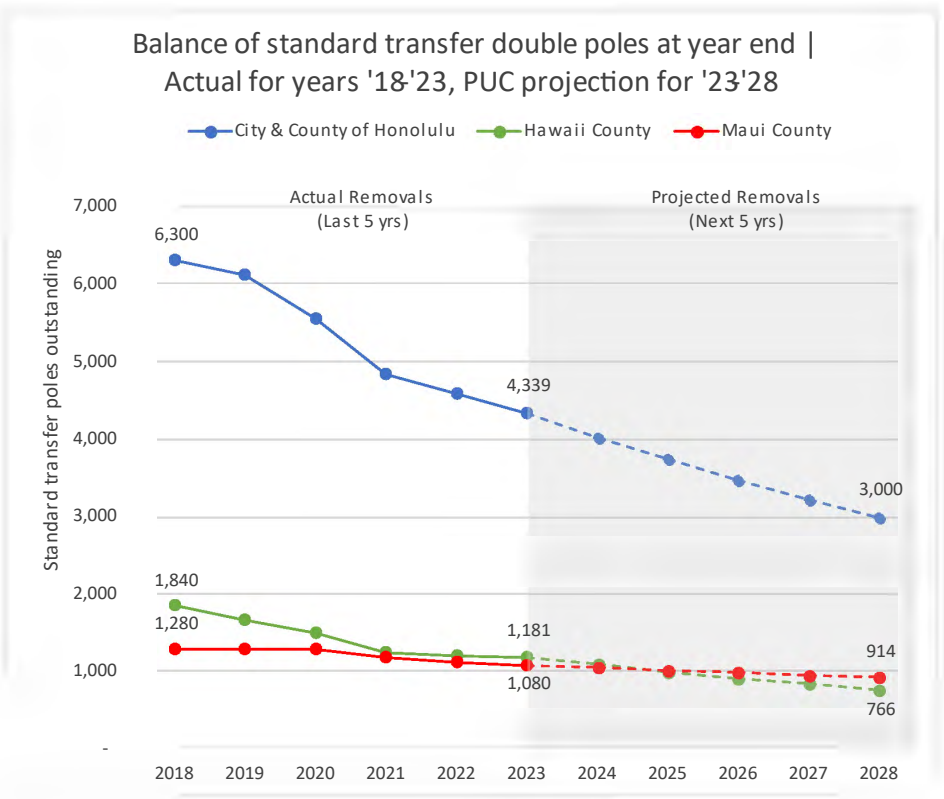

Figure 5: Number of backlog standard transfer double poles projected based on past 5 years actual removal rates

3.4 Challenges of double pole removal

Clearing the backlog of double poles is challenging for Hawaiian Electric for several reasons. As noted by Hawaiian Electric, the responsiveness of Stakeholders, including attachers such as Hawaiian Telcom, the City County of Honolulu, the State of Hawaii's Department of Transportation, and Charter Spectrum, among others, can create delays and administrative inefficiencies. Hawaiian Electric claims that it has limited, if any, control over Stakeholders' responsiveness to requests to transfer equipment, and states that its pole attachment agreements include "few sanctions or enforcement measures beyond typical tiered dispute resolution processes".[23] Hawaiian Electric asserts that the Stakeholders face staff shortages and therefore prioritize their core business activities in lieu of supporting double pole removal efforts.

For standard transfers, Hawaiian Electric must hire a Hawaiian Telcom-approved contractor to transfer Hawaiian Telcom's equipment to the new pole before removing the double pole. Hawaiian Electric claims that a limited number of Hawaiian Telcom-approved contractors are available, and it is difficult to contract with them. On Oahu there are five contractors qualified to transfer equipment, one in Hawaii County, and two in Maui County (although one contractor is currently focused on responding to Maui wildfire debris removal). Contractors may also be doing work for other Stakeholders which may make them even less available to take on more contract work. The lack of contractors available to initiate transfers and pole

[23] Hawaiian Electric response to Question-06, submitted November 30, 2023 (see Appendix B).

removals creates a bottle neck that delays double pole removals. According to Hawaiian Electric, another challenge involves standard transfers for which Hawaiian Telcom is responsible for furnishing the materials needed to mount Hawaiian Telcom's equipment on the new pole but said materials are not timely provided by Hawaiian Telcom.

For non-standard transfers, some Stakeholders do not timely respond to Hawaiian Electric's requests for equipment transfers, delaying the time it takes to remove a double pole. Hawaiian Electric has over 4,600 non-standard transfer requests (for both backlog and post-audit poles) outstanding with Stakeholders, mostly with Hawaiian Telcom (3,749), Charter Spectrum (716), and the State of Hawaii DOT (at least 120). The amount of time it takes Stakeholders to respond to Hawaiian Electric after being notified to transfer equipment varies widely. On average, as reported by the Stakeholders, AT&T takes up to one week to respond, Charter Spectrum takes up to four weeks to respond, Hawaiian Telcom takes up to eight weeks to respond, and the City and County of Honolulu takes up to 14 weeks to respond. If Stakeholders have already transferred their equipment, they claim that they notify Hawaiian Electric soon after, within a matter of days (Hawaiian Telcom, AT&T, and Charter Spectrum alert Hawaiian Electric within 72 hours) or a couple of weeks (State of Hawaii notifies Hawaiian Electric in about three to four weeks). Additionally, Hawaiian Electric aims to arrange staff and resources to remove fully bared double poles in batches, which requires coordination and a clear understanding of other entities' work timelines.

Hawaiian Electric claims that it has little to no recourse at the moment to enforce potential breaches of contract by Stakeholders of the joint pole agreements, preventing Hawaiian Electric from compelling Stakeholders to accelerate their equipment transfers.

Another challenge Hawaiian Electric faces is tracking its progress in removing backlog double poles and tracking post-audit double poles being created on an ongoing basis since June 2018. Currently, Hawaiian Electric has several joint pole databases (one for each service territory including a web-based version for Oahu, an Access database for Hawaii County, and an Excel database for Maui County), which contain data on pole attachments by parties that jointly own poles with Hawaiian Electric (State of Hawaii, City and County of Honolulu, County of Maui, and Hawaii County) and Hawaiian Telcom. In addition, Hawaiian Electric has a Pole Infrastructure Enterprise ("PIE") database containing information on the renters' (i.e., 3rd party Stakeholders, not pole owners) attachments. Since these databases are maintained separately, Hawaiian Electric contends it can neither aggregate information across databases nor easily query information out of the databases. To obtain granular counts, Hawaiian Electric must go into each database and obtain counts manually. Also, Hawaiian Electric claims that the databases do not always reflect the actual double pole status in the field because Hawaiian Electric is not always informed after crews have completed a transfer or if a double pole has been removed by Hawaiian Telcom.

4 Looking ahead

4.1 Hawaiian Electric's plan moving forward

Hawaiian Electric states that it is committed to addressing the backlog of double pole removals within the next 5 years, fulfilling its agreement as approved by Order No. 35786 in Docket No. 2018-0075. Hawaiian Electric also states that it is not taking a "business as usual" approach in its effort to meet its commitment. To that end, Hawaiian Electric has made several pledges:

- Continue to meet with Stakeholders to develop a long-term plan.

  - Hawaiian Electric committed to convening, together with the Commission, future Stakeholder meetings on a regular basis in the coming months in 2024 to formulate a clear plan for meeting its 2028 commitment and to address the total number of double poles in existence, regardless of when they were installed. The intention is to formulate an agreement among Stakeholders that will inform a docketed proceeding that can be opened and closed quickly.
- Accelerate total double pole removals.
  - The total number of backlog double poles (10,782) comprises mostly double poles requiring standard transfers (6,022) followed by double poles requiring non-standard transfers (3,862) and other double poles (898). An additional 5,585 post-audit double poles have been created since 2018. Over the next five years, Hawaiian Electric committed to removing 1,320 standard transfer double poles per year to clear the backlog, but this will only clear the backlog of double poles requiring standard transfers. Hawaiian Electric is committed to finding a solution to also clear the backlog of non-standard double poles, other double poles, and post-audit double poles.
- Evaluate opportunities to lower and maintain the contractor unit costs.
  - Hawaiian Electric reports that the revenues generated by the pole attachment leases are insufficient to cover the costs of their removal. Subsequently, it is currently trying to identify a budget that covers the double pole removals cost of $2.1-$2.5 million annually going forward. The increase in costs has focused Hawaiian Electric's attention on managing and understanding the drivers of the unit costs per pole removal in order to find efficiencies where possible. The lack of contractors available to perform transfers contributes to the bottleneck in pole removals and added costs. Hawaiian Electric will work to acquire contractors and to explore other solutions to ensure there is sufficient labor to meet the commitment.
- Work with Stakeholders to improve the process of transferring pole attachments.
  - Hawaiian Electric cannot meet its commitments without the support of the Stakeholders, particularly Hawaiian Telcom and Charter Spectrum, but also the City & County of Honolulu, the State Department of Transportation, and AT&T, some of whom have outstanding transfer requests from Hawaiian Electric. Hawaiian Telcom must provide the required standard transfer materials to contractors, and improved coordination between Stakeholders is essential going forward to ensure materials, workforce, and motivations are aligned. Also, Hawaiian Electric should explore updating its pole attachment agreements with Stakeholders to increase accountability and ensure timely transfers, thereby improving double pole removal rates.
- Improve tracking of each step in the process and publicly communicate progress.
  - Hawaiian Electric uses multiple databases to track its double poles across the islands and states that it does not always receive updates or notifications to changes in status of the double pole work. As a result, the fidelity of the data is low, especially on the count of total backlog and post-audit double poles. Without a good tracking system, Hawaiian Electric will not be able to effectively and accurately report its progress. Hawaiian Electric has committed to improving its data tracking system. As part of this commitment, Hawaiian Electric will provide regular updates to its public website so that communities know how many double poles remain and that progress is being made.

4.2 The Commission's plan moving forward

The Commission is focused on ensuring Hawaiian Electric removes the backlog of double poles and abandoned lines and equipment. To that end, the Commission will work with Hawaiian Electric to establish new processes to improve progress on double pole remediation for both backlog and post-audit poles.

The Commission envisions the following objectives and plan to ensure Hawaiian Electric meets its commitments, summarized in the bullets below:

- Objective 1: Improve accountability and transparency of Hawaiian Electric double pole removal processes.
    - Hawaiian Electric to convene regular Stakeholder meetings in the months ahead to ensure that Stakeholders coalesce around an agreed plan with a specific timeline, and coordinated processes, in order to clear the backlog of double poles. The goal is to have a plan finalized by the end of April 2024, after which the Commission will review and render a decision by the end of July 2024.
    - Hawaiian Electric to identify clear, aggressive, and achievable milestones for removing the backlog of double poles.
    - Hawaiian Electric to create a public facing platform, hosted and maintained by Hawaiian Electric, that shows accurate, up-to-date double pole data, including both backlog and post-audit poles as well as sub-categories of double pole types, in order to hold Hawaiian Electric and Stakeholders publicly accountable, to track progress, and to allow the public to report double pole issues expeditiously.
    - Hawaiian Electric to determine whether their pole tracking platforms can be consolidated and streamlined for programmatic efficiency and cost effectiveness.
    - Hawaiian Electric to identify opportunities for the Commission to support its enforcement capabilities to adequately respond to Stakeholders that are delaying the established double pole removal process.

- Objective 2: Identify and verify sustainable solutions to enable complete removal of double poles.
    - Gather sufficient information to define the scope and issues of any future proceeding, which will require robust and clear objectives to achieve an expedient resolution.
    - Clarify outstanding questions, such as 3rd party constraints and challenges to equipment transfers, Hawaiian Electric's and the Commission's enforcement options, and the role of the Federal Communication Commission ("FCC").
    - Explore use of innovative workforce development solutions to improve contractor availability.
    - Determine if an update of the Commission's Administrative Rules to the 2023 NESC is necessary for ensuring the timely removal of abandoned equipment.
    - Review and develop potential Hawaiian Electric pole replacement programs and procedures and identify areas for necessary improvements.
    - Ensure that appropriate processes and policies are in place to minimize or eliminate the accumulation of post-audit double poles moving forward.

5 Conclusion

Hawaiian Electric acknowledges that it remains behind in achieving its commitment of clearing the backlog of double poles by 2028. Currently, there are over 10,780 backlog double poles outstanding. The Commission is actively working to ensure that Hawaiian Electric removes the backlog of double poles and, together with Stakeholders, to reduce delays in removing post-audit double poles. The Commission, Hawaiian Electric, and the Stakeholders together are available to brief members of the Hawaii State Legislature on this issue.

Appendix A – Hawaiian Electric updated Double Pole Report for 2023

Received on October 27, 2023

HAWAIIAN ELECTRIC DOUBLE POLE REMOVAL UPDATE

The Hawaiian Electric Companies[1] ("Hawaiian Electric" or the "Company") and Hawaiian Telcom filed an application on April 4, 2018 in Docket 2018-0075, requesting approval from the Public Utilities Commission to transfer Hawaiian Telcom's ownership share in joint poles to Hawaiian Electric. This change management was recognized as an initial step to help ensure reliable communications and electric service and to provide opportunities for new technology-driven consumer products and services, including the effective deployment of new communications technologies.

One of the identified benefits from the transfer was the remediation of an existing backlog of double poles. At the time of the filing, the Company estimated that there were approximately 14,000 backlog double poles that existed on the five islands that Hawaiian Electric serves. Hawaiian Electric committed to eliminating the backlog of double poles within 10 years and performing a minimum of 1,000 standard transfers and double pole removals per year. Hawaiian Telcom also committed to performing a minimum of 50 non-standard transfers and double pole removals per year.

Why are there double poles?

A double pole occurs where a new pole is installed to replace an existing pole, but attachments on the old pole, such as communication facilities, streetlights, traffic control cables, and electrical facilities, have not been removed or transferred to the new pole. This situation results in two poles side-by-side until all attachments are removed or transferred to the new pole by their owners, at which time the old pole can be removed.

Why are new poles installed when there is an existing pole in place?

Hawaiian Electric performs pole replacements for several reasons including maintenance, using results from preventive and corrective inspections, engineering projects identified to strengthen a critical circuit or circuits, or through engineering or customer relocation projects. Poles replacements also occur because of damage from motor vehicle accidents, storms, or other impactful events.

Who is responsible for transferring or removing attachments?

Generally, the owners (including Hawaiian Telcom, Spectrum/Charter, City and County of Honolulu, State of Hawaii) of the attachments are responsible for transferring or removing their facilities from double poles, as such work could result in customer outages related to the respective service being provided. However, there are situations where one owner, through an agreement with another owner, is given the responsibility to transfer its facility. Examples include the following:

- On Hawai'i Island, Hawaiian Electric has a long-standing agreement with the County of Hawai'i ("County") to transfer the County's street light fixtures from the old poles to the new

[1] The Hawaiian Electric Companies consist of Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

poles. In turn, Hawaiian Electric bills the County an agreed upon dollar amount for each transfer completed.

- On all islands, through the ownership transfer agreement, Hawaiian Electric is responsible for completing all standard double pole transfers of Hawaiian Telcom's facilities from an old pole to a new pole as described in further detail below.

How are the occupants and lessees notified to complete their transfers?

When Hawaiian Electric initiates a pole replacement, as the *initiating company,* Hawaiian Electric will notify the other joint pole owners, also known as *occupants*, through a joint pole notice, also known as a *notice of intent* ("NOI"). The occupant is required to accept or reject on this NOI. If they reject, they need to provide the reason for rejection to the initiating company. Failure to provide such reasoning shall constitute the non-responding occupant's acceptance on the NOI.

Upon installation of the new pole replacement, the initiating company will notify the *occupants* that the new pole was installed through an *erection notice*. This notice informs the occupants of their obligation to complete the transfers of their equipment from the old pole to the new pole. Separately, after *occupants* have been provided the *erection notice*, Hawaiian Electric will notify *lessees* to transfer their facilities from the old pole to the new pole.

Are there challenges when transferring attachments?

Historically, there have been challenges for *occupants* and *lessees* to complete their transfers timely and consistently. Delays are experienced with all entities, especially on O'ahu where there is the largest volume of backlog double poles and newly created double poles. *Occupants* and *lessees* have communicated the reasons for the delay in transfers, which include insufficient staffing and priority of their required work as compared to their responsibility to complete the transfers of their facilities timely.

- Furthermore, there is a separate process for Hawaiian Telcom transfers which is described more fully below (see discussion regarding standard and non-standard transfers). This process is complicated by the limited number of Hawaiian Telcom-qualified contractors that are allowed to perform this type of work on Hawaiian Telcom's equipment, as these contractors must be on Hawaiian Telcom's approved contractor list. There have also been instances when Hawaiian Telcom's standard transfer materials were not readily available.

In addition to the backlog of double poles, the Company is addressing *preventive* double poles, which are double poles created since October 16, 2018, when D&O 35768 was issued approving the Company's application filed on April 4, 2018 in Docket 2018-0075. On O'ahu alone, the Company removed 188 preventive poles this year. If including Hawai'i Island and Maui, the preventive poles removed this year increases to 226. The preventive double pole counts are separate from the backlog double pole counts but are categorized using the same standard vs. non-standard definition, the same notification and transfer coordination process with the *occupants* and *lessees*, and the same obligation

and responsibility for the Company to perform the double pole standard transfer of Hawaiian Telcom's facilities and removal of the preventive double pole.

What is a standard transfer vs. a non-standard transfer under the Pole Licensing Agreement?[2]

Under the Pole Licensing Agreement between Hawaiian Electric and Hawaiian Telcom,[3] a standard transfer involves de-attaching Hawaiian Telcom's existing cables/facilities from the old pole and attaching them to the new pole. It does not involve splicing or interruption of service to Hawaiian Telcom's customers. Pursuant to the Pole Licensing Agreement, Hawaiian Electric is responsible for standard transfers of Hawaiian Telcom's facilities and removal of the old backlog double pole. All materials to facilitate the transfer of Hawaiian Telcom's equipment are provided by Hawaiian Telcom. For other entities attached to the pole, Hawaiian Electric will coordinate the facility transfers from other joint pole owners (e.g., streetlights, traffic control cables, etc.), and communication equipment from other carriers (e.g., Spectrum, AT&T, Verizon, Servpac, etc.).

Non-standard transfers of facilities on double poles are more complex than standard transfers, typically require the expertise of the Hawaiian Telcom staff to complete, and potentially require an interruption in Hawaiian Telcom service. For non-standard backlog transfers, Hawaiian Telcom is responsible for completing the transfer of Hawaiian Telcom equipment and, if the transfer involves the last of the facilities off the old pole, Hawaiian Telcom will remove the old pole. If the removed Hawaiian Telcom facilities are not the last off the pole, Hawaiian Electric will remove the old pole once all other *occupants* and/or *lessee* facilities are transferred to the new pole. These non-standard backlog double poles are Hawaiian Telecom's responsibility to address unless other third-party entities are still attached to the pole.

2018: How many standard vs. non-standard double poles are there?

Up until 2018, estimates of backlog double poles (both standard and non-standard) ranged from 14,000 to 16,000 for the islands of O'ahu, Hawai'i and Maui.

Subsequently, Hawaiian Electric hired a contractor to perform a field audit of the estimated backlog double poles on O'ahu in the June 2018 timeframe. Below are the results of the audit:

- 3,700 backlog double poles were confirmed not to be double poles in the field. The old backlog double pole was already removed. Hawaiian Electric was not notified when the transfers were completed and the old double pole removed, so its joint pole records were not updated.
- 6,300 backlog double poles were identified to be standard backlog transfers.
- 2,100 backlog double poles were identified to be non-standard backlog transfers.

[2] *See* Dkt 2018-0075 Application ("Application"), Exhibit B, pages 29 – 31 for a more detailed explanation.
[3] *See* Application, Exhibits B and C

Similar backlog double pole audits were not performed for Hawai'i Island and Maui. Instead, an 80% to 20% ratio of standard vs. non-standard backlog double poles was applied on the estimated double poles for Hawai'i Island and Maui.

- Hawai'i = 2,300 double poles x 0.80 = 1,840 standard backlog transfers.
- Maui = 1,600 double poles x 0.80 = 1,280 standard backlog transfers.

Today: How many standard poles are there?

Table 1 shows that as of 10/20/2023, there are an estimated 6,601 backlog standard double poles remaining to address for all islands. Please note that this is an estimate as Hawaiian Electric continues to find backlog standard double poles either already removed, or no record of the pole being replaced.

Island	Year											TOTAL Backlog Poles @ Start Yr 1	TOTAL Backlog Poles Remaining
	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	Sub Total		
Oahu	185	564	723	245	244						1,961	6,300	4,339
Hawaii	194	150	266	44	5						659	1,840	1,181
Maui	0	7	106	63	23						199	1,280	1,081
Subtotals	379	721	1,095	352	272	0	0	0	0	0	2,819	9,420	6,601

Table 1 - Backlog Standard Transfer Double Poles HE Removed (as of 10/20/23)

Lessons Learned:

Historically, the Company has removed 350 – 1000 double poles per year. To address the remaining 6,601 backlog standard double poles in the next 5 years, the Company targets to complete the transfer/removal of approximately 1,300 backlog double poles per year while addressing the following challenges:

1. Attachment owners do not complete their transfers in a timely, consistent manner, especially on O'ahu. Reasons for their delays range from:
    a. Insufficient staffing
    b. Prioritizing other work versus responsibility to complete attachment transfers.
2. Hawaiian Electric will need to proactively work with its contractors to transition from the 2023 double pole contracts to the 2024 double pole contracts without an interruption to double pole removal productivity. In previous years, there was a lag between the closing of the prior annual contracts and the renewal of the next annual contracts due to challenges in contract execution. As a result, productivity was lost during the time between contract closing and renewal. For 2024, the Company negotiated with its contractors to secure their unit pricing for 2-years which should allow the double pole remediation work to continue seamlessly from 2024 into 2025.
3. In 2023, Hawaiian Electric contracted with one contractor for Hawai'i Island and two contractors for Maui to address standard Hawaiian Telcom transfers and double pole removals. For Hawai'i Island, productivity with the contractor has been slow. Additionally, one of the two Maui contractors has been called upon to support Maui wildfire restoration work and that has taken priority over double pole remediation work. The Company has requested Hawaiian Telcom to expand its approved contractor list, however this issue remains to a challenge for Hawaiian Electric.

Moving Forward

Hawaiian Electric remains committed to addressing the remaining backlog of standard Hawaiian Telcom transfers and double pole removals within the next 5 years (10 years as stated in Docket 2018-0075 filed on April 4, 2018). Hawaiian Electric plans to:

- Target approximately 1,300 double pole removals per year over the next 5 years.
- Evaluate opportunities to understand the contractor unit costs and gain contractor accountability through prioritization of assigned work.
- Work with the *occupants* and *lessees* to improve their facility transfer response time as well as proper notification to Hawaiian Electric upon completion.
- Work with Hawaiian Telcom to complete their non-standard transfers and double pole removals.
- Work with Hawaiian Telcom to provide the required standard transfer materials to Hawaiian Electric's contractors timely and in adequate quantities.

Appendix B – Hawaiian Electric response to Commission Staff Questions

Received on November 30, 2023

Updated on December 1, 2023

November 30, 2023

The Honorable Chair and Members of the
Hawai'i Public Utilities Commission
465 South King Street
Kekuanaoa Building, 1st Floor
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Double Pole Removal
Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited
Responses to Commission's Questions – Final Report

The Hawaiian Electric Companies[1] herein submit the responses to the Commission's questions, filed on October 31, 2023, regarding Double Pole Removal Status.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura
Director
Regulatory Non-Rate Proceedings

c: Division of Consumer Advocacy

[1] The "Hawaiian Electric Companies" or "Companies" refer to Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

QUESTION-01

According to the Hawaiian Electric Double Pole Removal Update dated 10/27/2023 (Double Pole Removal Update), "Hawaiian Electric" or "the Company" is responsible for removing double poles on the five islands that Hawaiian Electric serves. Please clarify if there is only one department in the Company that is overall responsible for double pole removal on all five islands, or if there is a separate department for each of HECO, MECO, and HELCO. In either case, please provide a single department and single point of contact who represents the Company, who can provide status and responses to questions regarding this effort.

Hawaiian Electric Response:

Hawaiian Electric's ("Hawaiian Electric" or "Company") Operations Planning and Construction Management Division ("OP&CM") is responsible for overseeing the removal of certain double poles on the five islands that Hawaiian Electric serves, as indicated in these responses and Hawaiian Electric's Double Pole Removal Update dated 10/27/2023. OP&CM has two Joint Use Construction Managers ("JUCM") that oversee the double pole removal efforts on O'ahu, Hawai'i Island, and Maui. The JUCM report to Paul Nakagawa, Hawaiian Electric's Joint Pole Supervisor and the Company's point of contact for questions regarding this effort.

QUESTION-02

Please identify all current company-maintained databases used to track double poles. For each database, please include a brief description of what is included in the database and how/when updates are done.

Hawaiian Electric Response:

Hawaiian Electric ("Company") uses operating company-specific Joint Pole ("JP") databases where pole data information and responses are recorded.

O'ahu's JP web-based database is called Joint Pole Management ("JPM"). JPM provides the user the ability to look up a pole's history (*i.e.*, when a pole was installed, replaced, removed), JP ownership details (*i.e.*, other entities with a shared ownership interest in the pole), and JP responses (*i.e.*, which owner(s) responded to pole installation/replacement applications and/or transfer completion notices). Pole record updates typically occur when a pole replacement notice is entered into JPM, when notices are sent out to the owners and attachers of the pole being replaced, when the pole is replaced, and when the owners and/or attachers notify the Company that their transfers are complete. The JPM reporting feature is limited and unable to run custom/ad-hoc reports.

Hawai'i Island's JP database is called JP Track ("JPT") and is an Access database. Like JPM, JPT also tracks pole installations, JP ownership, and JP responses. Pole record updates typically occur when a pole replacement notice is entered into JPT, when notices are sent out to the owners and attachers of the pole being replaced, when the pole is replaced, and when the owners and/or attachers notify the Company that their transfers are complete. JPT also tracks the status of other attachers attached to a pole if the entity is known at the time of the pole replacement.

QUESTION-02
DOUBLE POLE REMOVAL STATUS
PAGE 2 OF 2

Maui's JP database is called Notice of Intent ("NOI"). It is an Excel database that tracks pole installations, JP occupants, and JP responses. Pole record updates may occur when a pole replacement notice is entered into the NOI database, when notices are sent out to the owners and attachers of the pole being replaced, when the pole is replaced, and when the owners and/or attachers notify the Company that their transfers are complete.

QUESTION-03
DOUBLE POLE REMOVAL STATUS
PAGE 1 OF 4

QUESTION-03

Please provide the information in the following Data Tables:

	Summary of All Double Poles	HECO	MECO	HELCO	Total
1	# of Double poles requiring a standard transfer by Hawaiian Telcom (HT)				
2a	# of Double poles requiring a non-standard transfer by the County				
2b	# of Double poles requiring a non-standard transfer by State of Hawaii				
3	# of Double poles requiring a non-standard transfer by a Renter (an attacher who is NOT an Owner)				
4	# of Double poles to be removed that have NO attachments remaining				
5	Other categories of poles that contribute to Total # Double poles, if any. Please provide a list at the end of this table.				
6	**TOTAL # of Double poles presently, as of __/__/2023 (The Company to fill in the date)**				
7	Out of total double poles (100%), the estimated average percentage of double poles that require a standard transfer and the estimated average percentage of poles that require a non-standard transfer *See Note A below				
8	Total # of double poles at start of 10-year period based on the Companies' field audit in June 2018 (10-year period from October 2018 to October 2028)				
9	Total # of double poles removed since the start of the 10-year period.				
10	Estimated # double poles added each year *See Note A below				

*Note A: Provide basis for the estimate.

QUESTION-03
DOUBLE POLE REMOVAL STATUS
PAGE 2 OF 4

Hawaiian Electric Response:

TABLE	Summary of All Double Poles	HECO	MECO	HELCO	Total
1	# of Double poles requiring a standard transfer by Hawaiian Electric[1]	3,855	1,018	1,149	6,022
2a	# of Double poles requiring a non-standard transfer by the County	477	0	0	477
2b	# of Double poles requiring a non-standard transfer by State of Hawaii	107	0	0	107
3	# of Double poles requiring a non-standard transfer by a Renter (an attacher who is NOT an Owner)	2,453	422	987	3,862
4	# of Double poles to be removed that have NO attachments remaining	75	3	153	231
5	Other categories of poles that contribute to Total # Double poles, if any. Please provide a list at the end of this table.	398	34	235	667
6	**TOTAL # of Double poles presently, as of 11/02/2023 (The Company to fill in the date)**	6,781	1,477	2,524	10,782
7	Out of total Double poles (100%), the estimated average percentage of Double poles that require a standard transfer and the estimated average percentage of poles that require a non-standard transfer *See Note A below	Std Transfer = 63.8% Non-Std Transfer = 36.2%	Std Transfer = 71.4% Non-Std Transfer = 28.6%	Std Transfer = 60.9% Non-Std Transfer = 39.1%	Std Transfer = 64.2% Non-Std Transfer = 35.8%
8	Total # of Double poles at start of 10-year period based on the Companies' field audit in June 2018 (10-year period from October 2018 to October 2028)	6,300	1,840	1,280	9,420
9	Total # of double poles removed since the start of the 10-year period.	1,968	667	205	2,840
10	Estimated # double poles added each year *See Note A below	See comment and table in response below	See comment and table in response below	See comment and table in response below	See comment and table in response below

[1] For the above Table, row 1, the Hawaiian Electric's ("Company's") responses are based on its interpretation that the description provided should be "# of Double poles requiring a standard transfer by Hawaiian Electric" rather than "# of Double poles requiring a standard transfer by Hawaiian Telcom (HT)", and the Company has adjusted the description accordingly in the response.

QUESTION 03
DOUBLE POLE REMOVAL STATUS
PAGE 3 OF 4

For the above Table, rows 1 through 9, the Company interpreted the count as the number of backlog double poles the Company committed to removing in Docket 2018-0075 Application. All counts are as of November 2, 2023.

For row 10, the Company interpreted the count to be the total estimated number of new double poles created that are not part of the "backlog" double poles described in rows 1 through 9. These new double poles are referred to as "preventive" double poles. The table below lists the year the preventive double pole was created as of November 2, 2023. The Company is actively addressing the transfers and removals of the preventive double poles.

Row	Year	HECO	MECO	HELCO	Total
10	2018	74	34	45	153
	2019	880	47	291	1218
	2020	752	7	329	1088
	2021	793	10	208	1011
	2022	930	5	146	1081
	2023	786	52	196	1034
Subtotals		**4215**	**155**	**1215**	**5585**

For rows 2a and 2b, the Company interpreted the count as the number of remaining backlog double poles requiring transfers by the County (on O'ahu and Hawai'i Island) and the State of Hawai'i (on O'ahu). The term "non-standard transfer" applies to HT's transfer, as defined in the Docket 2018-0075 Application, Exhibit B, pages 29-31, and not to other attachers.

For row 3, the Company interpreted the count to be the number of remaining backlog non-standard double pole transfers by Hawaiian Telcom, per the definition of non-standard transfer described above.

QUESTION-03
DOUBLE POLE REMOVAL STATUS
PAGE 4 OF 4

For row 5, the Company interpreted the count to be any double poles not included in rows 1, 3, or 4. This count includes double poles that may still have incomplete Company transfers, double poles that are not topped and still erected in the electrical space, and Double poles with incomplete equipment and riser transfers by non-Hawaiian Telcom renters.

For row 6, the Company interpreted the count to be the sum of rows 1, 3, 4, and 5. Rows 2a and 2b are interpreted to be subsets of rows 1, 3, or 5.

For row 7, for each operating Company, the estimated average percentage of double poles that require a standard transfer was derived by summing the corresponding values for rows 1, 4, and 5, and then dividing that number by the value found in row 6. The estimated average percentage of double poles that require a non-standard transfer was derived by dividing the count for row 3 by the count for row 6.

The responses listed in row 8 represent the total backlog standard transfers at the start of the 10-year period from October 2018, and the responses listed in row 9 represent the total number of backlog standard double poles the Company removed since the start of the 10-year period from October 2018. The Company does not have the total backlog non-standard transfers counts Hawaiian Telcom removed since the start of the 10-year period. That information should be obtained from Hawaiian Telcom.

QUESTION-04

Please also provide this information, which should provide an idea of how many poles are in each stage of the process.

a. Standard Transfers (HE contractor performs the transfer and removes the double pole)

Poles Requiring Standard Transfers	Number of Poles in Each Stage Note: Each pole should be counted in only one of the stages below			
Company	The Company has not hired the Contractor yet (A)	Contractor hired, but is waiting for HT to provide materials for the transfer (B)	Contractor work in progress – The Company is waiting for Contractor's notification that transfer was complete and pole was removed (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO				
MECO				
HELCO				
Total				

b. Non-Standard Transfers (Each attacher performs the transfer and either removes or has the electric utility remove the double pole)

Poles requiring non-standard transfers	Number of Poles in Each Stage Note: Each pole should be counted in only one of the stages below			
Company	The Company to send First Notification to Attachers (A)	Transfer work in progress – The Company is waiting for Attacher's notification that transfer was complete and pole was removed (B)	Transfer was complete but waiting for The Company to remove the pole (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO				
MECO				
HELCO				
Total				

QUESTION-04
DOUBLE POLE REMOVAL STATUS
PAGE 2 OF 3

Hawaiian Electric Response:

a.

Poles Requiring Standard Transfers	Number of Poles in Each Stage Note: Each pole should be counted in only one of the stages below			
Company	The Company has not hired the Contractor yet (A)	Contractor hired, but is waiting for HT to provide materials for the transfer (B)	Contractor work in progress – The Company is waiting for Contractor's notification that transfer was complete and pole was removed (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO	4,200	0	128	4,328
MECO	1,022	0	33	1,055
HELCO	1,519	0	18	1,537
Total	6,741	0	179	6,920

Hawaiian Electric ("Company") interpreted the counts in the Total (A+B+C) column as the number of backlog double poles the Company committed to removing in the Docket 2018-0075 Application. (Question 3, sum of table rows 1, 4, & 5). The counts in column A include the backlog double poles that have no attachments remaining, and the other categories of poles that contribute to the total number of backlog double poles that do not involve non-standard transfers by Hawaiian Telcom. Counts in column A are as of November 2, 2023. Counts in column C are as of November 3, 2023.

QUESTION-04
DOUBLE POLE REMOVAL STATUS
PAGE 3 OF 3

b.

Poles requiring non-standard transfers	Number of Poles in Each Stage Note: Each pole should be counted in only one of the stages below			
Company	The Company to send First Notification to Attachers (A)	Transfer work in progress – The Company is waiting for Attacher's notification that transfer was complete and pole was removed (B)	Transfer was complete but waiting for The Company to remove the pole (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO	?	?	?	2,453
MECO	?	?	?	422
HELCO	?	?	?	987
Total	?	?	?	3,862

Poles requiring Hawaiian Telcom non-standard transfers are to be performed by Hawaiian Telcom. The Companies do not have access to Hawaiian Telcom data and are not aware of the number of poles in each stage of the table above.

QUESTION-05

For each service territory and for each of the following: a) standard transfers, which can be coordinated and performed by the Company and its contractors, b) non-standard transfers needed by POLE OWNERS, c) non-standard transfers needed by RIGHT OF WAY ATTACHERS, and d) non-standard transfers needed by RENTERS:

a. Please outline the process and steps involved with the removal of the double pole, up to the final step of formally removing the double pole from the double pole count.
b. Please list all attachment owners and types of attachments. Define authorized attachers and renters.

Hawaiian Electric Response:

a. **aa.** For each service territory, namely O'ahu, Hawai'i Island, and Maui County, Hawaiian Electric's ("Hawaiian Electric" or "Company") approved contractors perform the standard transfers of Hawaiian Telcom's ("HT") equipment from the old double pole to Hawaiian Electric's new pole, and then removes the old double pole. First, Hawaiian Electric's Joint Use Construction Managers (JUCM) identify double poles on each of the islands and determine if the transfer is standard or non-standard based on HT's equipment on the pole and the attributes of the pole itself. Next, they work with the Joint Pole Coordinators ("JPCs") to research the double pole's history, and confirm if there are any other non-HT entities attached to the double pole. When non-HT entities are attached to the double pole, the JPCs and JUCMs notify the non-HT entities to transfer their facilities and have those attachers subsequently to notify Hawaiian Electric once complete. To address the HT standard transfer, the JUCMs assign the double pole to one of Hawaiian Electric's contractors approved to transfer HT's cables. The contractor is also assigned removal of the double pole after they complete the HT standard transfer.

Once confirmation is received that the double pole was removed, the double pole count is reduced accordingly.

ab - ad. All HT non-standard transfers on to Hawaiian Electric poles are performed by HT for each Hawaiian Electric service territory. Pole removals, however, are performed either by Hawaiian Telcom, Hawaiian Electric's approved contractors, or Hawaiian Electric's T&D Operations crews, depending upon circumstances. Similar to standard transfers, first, Hawaiian Electric's JUCMs work with JPCs to research double pole's history and confirm if there are any non-HT entities attached to the double pole. If non-HT entities are attached to the double pole, the JPCs and JUCMs notify the remaining attachers and instruct them to complete their attachments and subsequently provide notification to Hawaiian Electric once the transfer is complete. Concurrently, Hawaiian Electric will inform HT of the non-standard transfer for Company maintenance pole replacements. Renters (as defined below) who effectuate a pole replacement coordinate all transfers of third-party communication facilities from the old pole to the new pole, including HT transfers, regardless of the type (standard or non-standard). If HT is the last entity to complete transfer of facilities, HT will remove the old double pole. If HT is not the last to complete its transfers, HT is still obligated to inform Hawaiian Electric when the HT transfer is complete, and Hawaiian Electric will then remove the double pole once the remaining non-HT entities complete their transfer. To further clarify, the definition of non-standard transfers only applies to Hawaiian Telcom, as defined in the Docket 2018-0075 Application, Exhibit B, pages 29-31. Right-of-Way Attachers such as the City & County of Honolulu or the State of Hawai‘i are only

responsible for their respective facilities and depend on Hawaiian Electric to manage the transfers of communication facilities.

ba-bd. An authorized attacher is any attaching entity that has a formal agreement with the pole owner(s) to attach a predetermined and agreed upon attachment(s) through a formal approval process. A renter is any attaching entity that is not a party to a joint pole agreement with a pole owner and does not have any equitable ownership in another party's pole.

b. Below is a list of all attachment owners and types of attachments.

<u>O'ahu</u>

- Hawaiian Telcom (renter). Wireline cables – copper and fiber optic, fiber distribution hubs, cross connect boxes, load coils, repeaters, splices, pole mounted and line terminals, VSEMs, meters, air pressure devices, risers, NIDs.
- City and County of Honolulu (owner). Streetlights, wireline traffic control cables and fiber optic, INET cables, risers, meters, gateway devices, traffic flashers.
- State of Hawai'i (owner). Streetlights, wireline traffic control cables and fiber optic, INET cables, risers, meters, traffic flashers.
- Spectrum (renter). Wireline cables – coax and fiber optic, Wi-Fi antennas on strands, power supply boxes, related cable devices, meters, risers.
- Servpac (renter). Wireline fiber optic, risers.
- Lumen (renter). Wireline fiber optic, risers.
- AT&T (renter). Wireless antennas and related devices.
- AT&T Gov (renter). Wireline cables – copper and fiber optic.

- Sandwich Isle Communication (renter). Wireline cables – copper and fiber optic, risers.
- Verizon (renter). Wireless antennas and related devices.

Hawai'i Island

- Hawaiian Telcom (renter). Wireline cables – copper and fiber optic, fiber distribution hubs, cross connect boxes, load coils, repeaters, splices, pole mounted and line terminals, VSEMs, meters, air pressure devices, risers, NIDs.
- County of Hawai'i (owner). Streetlights, risers, cameras, traffic flashers, traffic signs, traffic lights, pedestrian walk signs.
- Spectrum (renter). Wireline cables – coax and fiber optic, Wi-Fi antennas on strands, power supply boxes, related cable devices, meters, risers.
- Lumen (renter). Wireline fiber optic, risers.
- AT&T (renter). Wireless antennas and related devices.
- AT&T Gov (renter). Wireline cables – copper and fiber optic.
- Sandwich Isle Communication (renter). Wireline cables – copper and fiber optic, risers.

Maui

- Hawaiian Telcom (renter). Wireline cables – copper and fiber optic, fiber distribution hubs, cross connect boxes, load coils, repeaters, splices, pole mounted and line terminals, VSEMs, meters, air pressure devices, risers, NIDs.

QUESTION-05
DOUBLE POLE REMOVAL STATUS
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- Spectrum (renter). Wireline cables – coax and fiber optic, Wi-Fi antennas on strands, power supply boxes, related cable devices, meters, risers.
- Lumen (renter. Wireline fiber optic, risers.
- AT&T Gov (renter). Wireline cables – copper and fiber optic.
- Sandwich Isle Communications (renter). Wireline cables – copper and fiber optic, risers.

QUESTION-06
DOUBLE POLE REMOVAL STATUS
PAGE 1 OF 2

QUESTION-06

At the virtual meeting held on October 19, 2023 ("October meeting"), HECO stated numerous challenges of having the Owners and Renters respond to HECO's requests. For example, 1) HT often does not have the materials required for HECO's contractor to perform a standard transfer, 2) HECO often does not receive notification when a pole transfer is completed by the Owner or Renter.

a. For the Companies, please provide a list of penalties, or actions that each can take based on the most current Pole Attachment Agreements, Joint Pole Agreements, and any other contracts with Hawaiian Tel. Cite the references.

Hawaiian Electric Response:

a. Hawaiian Electric's ("Hawaiian Electric" or "Company") various pole attachment agreements with all attachers, including joint owners, were negotiated and entered into with the presumption that the parties to each agreement would follow the terms, conditions, and processes set forth in each agreement. As such, the agreements contain few sanctions or enforcement measures beyond typical tiered dispute resolution processes. The Company's agreements, both with the joint pole owners and with other attachers, do not provide for actions available to the Company to force an attacher to transfer its equipment, nor do the agreements provide for penalties to impose on an attacher for failure to timely complete its transfers.

Hawaiian Electric's Pole Attachment Agreements with non-joint pole attachers, as well as Hawaiian Electric's agreements with HT, all have dispute resolution terms that provide a tiered process for the parties to engage in dispute resolution at different management levels. (*See*, License Agreement for Pole Attachments § 21; *see, also* HT Pole Licensing Agreement § 18 and HT Operating Agreement § 25). The dispute resolution terms in all of these agreements are similar and provide for multiple meetings

at different managerial and executive levels before moving to mediation and then, if still unresolved, to arbitration.

The Company's JPAs for both Honolulu and Maui Counties also contain dispute resolution terms, which provide for informal discussions before submitting the dispute to arbitration. (*See* O'ahu's JPA, §§ 4 & 5 Maui's JPA, § 26).

QUESTION-07

Please identify all notification and enforcement options currently available to the Companies (e.g., from Master License Agreements, FCC rules/complaint). Have the Companies explored other options to expedite the timely transfers of all attachments? If so, please identify and explain these efforts.

Hawaiian Electric Response:

The Federal Communications Commission ("FCC") only allows sanctions or penalties to be imposed on attachers in very limited circumstances that are unrelated to parties' obligations to transfer their equipment to new poles. *See, i.e.*, FCC 11-50, WC Docket No. 07-245, 2011, § IV(D) at ¶ 115. The Federal Pole Attachment Act authorizes the FCC to regulate the rates, terms, and conditions for pole attachments unless a state reverse preempts and decides it will regulate the rates, terms and conditions. *See*, 47 U.S.C. § 224(b)-(c).

Please also see the response to Question-06.

QUESTION-08

Do the Companies currently enforce any or all of the current penalties or actions to ensure response and action by the other Pole Owners and Attachers? Why or why not?

Hawaiian Electric Response:

As noted in the Companies' response to Question-06, there are no current penalties or actions to ensure response and specific action by the other Pole Owners and Attachers. The Companies have previously determined to not invoke arbitration or dispute resolution provisions of its contracts and have instead focused on working collaboratively with the Pole Owners or Attachers from a logistics perspective; however, in light of ongoing concerns with double pole removals, the Companies are now evaluating all options.

QUESTION-09

Specifically, is there currently a contract or agreement that considers an attachment "a breach of contract" or "unauthorized" if a Pole Owner or Renter is unresponsive to the Companies' pole transfer requests?

Hawaiian Electric Response:

While the Companies have never cited an Attacher's non-responsiveness, lack of timeliness, etc. in the recent past as a breach of contract, when a party to a contract fails to adhere to material terms or complete material obligations, that may constitute a breach of contract under contract law. Please also see the Companies' response to Questions 06-08.

QUESTION-10

At the October meeting, HECO stated that it currently uses O&M and Removal funds to remove double poles. HECO also stated the cost to fund the pole transfers is not sufficient to cover the costs. For the Companies, please discuss whether removing the remaining double poles is in the budget for the next 5 years. If double pole removals have been budgeted, please provide how much is in the budget for each service territory. If it is already known that the budgeted amount will be insufficient, please discuss the Companies' plans to remedy this insufficiency.

Hawaiian Electric Response:

The Companies committed to removing the remaining backlog of double poles noted in the summary table in Question 3, as part of its Docket 2018-0075 filing, by applying revenue contributed by pole attachers. The Companies forecasted annual revenues of approximately $650,000 per year, over 10 years, as part of the transfer of equity ownership interest sale approved in Docket 2018-0075. This annual amount is insufficient to address the remaining backlog double poles the Companies are responsible to remove. It is estimated that an additional $2.1M to $2.5M per year over the remaining 5 years will be needed to address these backlog double poles. The Companies included the additional funds required to remediate the backlog double poles in its annual budget reviews.

QUESTION-11

If after the completion of Data Table item 4 (number of double poles that have NO remaining attachments) there are double poles with no remaining attachments, please discuss the reasons or challenges for delays in the removal of these poles.

Hawaiian Electric Response:

For the number of double poles needing removal that have no remaining attachments, one of the major challenges is ensuring availability of contractors and/or T&D Operations crews that can perform the work in a timely manner once it is assigned. Hawaiian Electric groups these bare double poles with other double poles in the vicinity to optimize the removal efficiency for the contractor assigned. Another challenge to Hawaiian Electric is project prioritization among qualified contractors when they are choosing between work performed on behalf of Hawaiian Electric and work performed on behalf of other entities. In short, contractors are not solely dedicated to the Hawaiian Electric double pole removal effort. In each of the Hawaiian Electric service territories, the Company collaborates with the respective contractors to obtain weekly schedules for double pole removals, but delays still occur.

QUESTION-12

At the October meeting, HECO stated that it is very difficult to obtain the actual double pole counts and status, in both the Joint Pole Database and the PI Database. Also, that HECO, MECO, and HELCO each maintain their own records in these two databases. According to Docket 2018-0075, HECO planned to acquire a consultant to provide the actual count of double poles. Please describe the Companies' plans to upgrade and/or consolidate both databases to monitor the double pole counts and status?

Hawaiian Electric Response:

There are no current plans to upgrade and/or consolidate the different Joint Pole Databases and the PIE Database in order to monitor the double pole counts and status electronically. The JP Databases track pole transactions and history by JP owner, including existing Hawaiian Telcom ("HT") occupancy and existing line transfer responses. The PIE Database does not track double poles, but tracks new pole attachments by all other non-JP owners, e.g. renters, that were formally approved by the Companies since purchasing the communication space on poles jointly owned with HT. New pole attachment and overlash requests by HT are also tracked in the PIE Database.

As described in Docket 2018-0075, the Company did acquire a contractor to conduct a double pole field audit of existing double poles on O'ahu. For Hawai'i Island, the Company performed a double pole field audit using its internal field inspectors. For Maui, due to budgetary restrictions, the Company utilized available inspection and joint pole records to determine the count of double poles. The backlog double pole counts discussed in the response to Question 3 above are the result of these counts.

QUESTION-13
DOUBLE POLE REMOVAL STATUS
PAGE 1 OF 2

QUESTION-13

At the October meeting, per HECO, the current double pole count (standard transfers only) for all islands is 6,604, which amounts to over 1,300 double pole removals per year. However, this number does not include double poles requiring non-standard transfers, double poles that are bare and pending HECO removal, and new double poles that are added each year.

a. With consideration of the number or pole removals completed in the past 5 years, what assurances can the Companies give to the PUC that the remaining balance of double poles can be removed within the next 5 years?
b. If the Companies continue "business as usual" regarding removal of double poles, do each of HECO, MECO and HELCO commit to meeting the goal of removing ALL double poles (as provided in the October 27, 2023 report) within the remaining 5 years?
c. If the answer is no, then what new or future improvements, programs, actions, or updates to the contracts/agreements to invoke penalties, etc., are the Companies planning to implement to ensure this goal is met?

Hawaiian Electric Response:

a. The Hawaiian Electric Companies ("Hawaiian Electric" or "Companies") remain committed to addressing the remaining backlog of standard Hawaiian Telcom transfers and double pole removals within the next 5 years.

b. The Companies are not applying a "business as usual" standard in their effort to remove ALL double poles within the remaining 5 years. However, the Companies' responses and counts provided to these questions focus on the backlog of double poles that the Companies committed to removing in Docket 2018-0075. In Question 3, the Companies added a table of double poles created since October 16, 2018, defined as "preventive" double poles, and these are routinely created in addition to the pre-existing backlog double pole counts described in Question 3, rows 1 through 9 inherited by the Companies in 2018. The Companies define "ALL" double poles as the sum of the remaining backlog double poles and the more recently created preventive double poles. As stated in the response to 13a

above, the Companies are committed to addressing the remaining backlog double pole removals within the next 5 years.

c. The Companies will not be able to remediate all of the preventive double poles, and newly created preventive double poles created in the next 5 years. As stated above, preventive double poles are created on a routine basis for various reasons such as regular maintenance, engineering projects identified to strengthen a critical circuit or circuits, or through engineering or customer relocation projects. In short, due to the nature of preventive double poles, Hawaiian Electric's efforts to address and remediate preventive double poles will continue beyond the next 5 years. Nonetheless, Hawaiian Electric will review its various Joint Pole Agreements and Attachment Agreements and will explore opportunities to amend these agreements to facilitate timely transfers in the future.. Hawaiian Electric will also review, to the extent applicable, any action that can be exercised with any communication carrier under the FCC's One Touch Make Ready (OTMR) – based pole attachment process.

QUESTION-14

At the October meeting, HECO discussed the discrepancies of the actual initial double pole count of 14,000 (see Docket No. 2018-0075) for the Companies. Given the audit performed, please confirm the actual number of double poles that the Companies finally committed to being removed within the 10-year period.

Hawaiian Electric Response:

The Companies committed to removing approximately 9,420 backlog standard double poles

within the 10-year period. This number is also found in Question 3, row 8.

QUESTION-15

Do the Companies have a preference for how to publicly provide status of the joint poles (number removed, balance remaining, for example), such as within a publicly available status conference that allows for public comment, or a webpage on the Companies' websites that specifically provides information as it is known to the Companies?

Hawaiian Electric Response:

Hawaiian Electric envisions providing quarterly progress metrics related to its double pole remediation efforts on the Company's publicly-accessible website.

QUESTION-16
DOUBLE POLE REMOVAL STATUS
PAGE 1 OF 1

QUESTION-16

Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?
b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?
c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?
d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

Hawaiian Electric Response:

The responses to questions a. through d. for each of the six responding Attachers are included as

Attachments 1 through 6 to this response:

- State of Hawaii DOT
- City and County of Honolulu
- Charter Spectrum
- County of Hawaii
- Parcor – AT&T
- Hawaiian Telcom

QUESTION-16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 1 (HI DOT)
PAGE 1 OF 1

QUESTION-16
Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?
b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?
c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?
d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

Hawaiian Electric Response: (From State of Hawaii, DOT Hwys)

a. 120 – 150 ea.

b. At this time it depends on what kind of priority HECO puts on the pole transfer request.

We are usually not responsible for removing the pole.

c. Yes. 3-4 weeks.

d. Yes. Next day.

QUESTION-16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 2
(HONOLULU C&C)

QUESTION-16 PAGE 1 OF 1

Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet? The City has about thirty-four (34) non-standard transfers that have not been completed.

b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? The City's Department of Transportation Services (DTS) reported that they take about 2 to 3 months to schedule and complete the transfers. The City's Department of Facility Maintenance (DFM) reported that they take about 4 to 5 weeks to schedule and complete the transfers. Are you also responsible for removing the pole after you have completed the transfer? No.

c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? Yes. What is the average time after the transfer that you provide notification? Typically, the City provides notification to the utility within a week.

d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? n/a What is the average time after the pole removal that you provide notification? n/a

Hawaiian Electric Response:

a.

QUESTION 16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 3 (SPECTRUM)
PAGE 1 OF 1

HCR 41/HR 45 (SLH) – Double Pole Removal

Hawaiian Electric Company, Inc. Hawaii Electric Light Company, Inc., and Maui Electric Company, Limited ("Hawaiian Electric" or "Companies") Questions

SPECTRUM OCEANIC, LLC (CHARTER COMMUNICATIONS) RESPONSES TO QUESTION 16

Q. 16.a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?

A. **Spectrum currently has 716 non-standard uncompleted transfers from the Companies**.

Q. 16.b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?

A. **The average time Spectrum takes to perform a transfer after receiving notification from the Companies is 30 days. Charter is not responsible for removing the pole after it has completed a transfer.**

Q. 16.c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?

A. **The Companies are responsible for removing the pole after Spectrum has completed a transfer. Spectrum notifies the Companies within 72 hours of completing a transfer.**

Q. 17.d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

A. **N/A**

QUESTION-16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 4 (COUNTY OF HI)
PAGE 1 OF 1

QUESTION-16
Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?
b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?
c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?
d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

County of Hawaii:

a. None.

b. HELCO typically transfers most CoH equipment. If there is equipment that HELCO can't transfer, CoH would either plan to work along HELCO or would complete the work within 1-2 weeks of when we are notified that we must transfer equipment. CoH is not responsible for removing the pole in any standard transfer.

c. In the rare case that CoH must transfer equipment, CoH will either work along with HELCO or notify HELCO within 1-2 weeks of when our transfer or removal is complete.

d. CoH is not responsible for removing the pole in any standard transfer.

QUESTION-16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 5 (PARCOR AT&T)
PAGE 1 OF 1

QUESTION-16
Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?

AT&T Response: 2023 received ~27 requests for pole transfer work. Most of the requests did not involve Government Furnished Property (GFP) facilities.

b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?

AT&T Response: Work was scheduled within 7 days of notification. AT&T not responsible for removal of the pole.

c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?

AT&T Response: HECO is notified within two working days after work is completed.

d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

AT&T Response: Not responsible for removal of the old pole

Hawaiian Electric Response:

a.

QUESTION-16
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 6 (HAWAIIAN TELCOM)
PAGE 1 OF 1

QUESTION-16

Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?
   - HECO - 2847
   - MECO - 287
   - HELCO - 615

b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? 60 days Are you also responsible for removing the pole after you have completed the transfer? If the pole was placed in service in 2018 or prior, HT is responsible for removing the pole if we are the last attacher on the pole. If the pole was placed in service after 2018 or there is another attacher remaining on the pole after we complete our transfer, HEC is responsible for removing the pole.

c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? Yes. What is the average time after the transfer that you provide notification? 24-48 business hours

d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? Yes. What is the average time after the pole removal that you provide notification? 24-48 business hours

Hawaiian Electric Response:

a.

QUESTION-17

Upon completion of responses to these questions, the Companies shall have all of the entities who are pole Attachers (pole owners, right of way attachers, and 3rd party renters), review the final Report of HECO's Responses to the Commission Regarding Double Poles, and sign Attachment A, Concurrence Sheet. Attachment A with signatures and attachments submitted by the entities shall be included in the final report of responses to the Commission.

Hawaiian Electric Response:

The *Attachment A, Concurrence Sheet* for each of the four responding Attachers are included as

Attachments 1 through 4 to this response:

- Hawaii State Gov – DOT
- City and County of Honolulu
- Charter Spectrum
- County of Hawaii

QUESTION-17
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 2 (C&C HONOLULU)
ATTACHMENT A
PAGE 1 OF 1

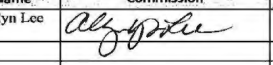
HCR 41 Double Poles

Report of Hawaiian Electric's Responses to the Commission Regarding Double Poles

Attachment A

Concurrence Sheet

Note: This list must include ALL entities who have attachments on Double Poles - Joint Pole Owners (HECO, MECO, HELCO, State of Hawaii, City and County of Honolulu, County of Hawaii, and County of Maui), Hawaiian Tel, and all 3rd Party Renters/Attachers.

Entity Name	Entity Type (Joint Pole Owner or 3rd Party Renter/ Attacher)	Entity Point of Contact (POC) Name	POC Signature indicating Review of Hawaiian Electric's Report of Responses to the Commission	Date Signed	Concur with Hawaiian Electric's Report? (Y/N) *See Note	Name of Attachment Submitted
City & County of Honolulu	Joint Pole Owner	Allyn Lee		11/27/23	Y	

*Note:
If N for non-concurrence, submit comments and issues as an Attachment to the Report. Please include all areas of non-concurrence, as well as areas of agreement.

QUESTION-17
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 1 (HAWAII DOT)
ATTACHMENT A
PAGE 1 OF 1

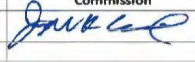
HCR 41 Double Poles

Report of Hawaiian Electric's Responses to the Commission Regarding Double Poles

Attachment A

Concurrence Sheet

Note: This list must include ALL entities who have attachments on Double Poles - Joint Pole Owners (HECO, MECO, HELCO, State of Hawaii, City and County of Honolulu, County of Hawaii, and County of Maui), Hawaiian Tel, and all 3rd Party Renters/Attachers.

Entity Name	Entity Type (Joint Pole Owner or 3rd Party Renter/ Attacher)	Entity Point of Contact (POC) Name	POC Signature indicating Review of Hawaiian Electric's Report of Responses to the Commission	Date Signed	Concur with Hawaiian Electric's Report? (Y/N) *See Note	Name of Attachment Submitted
State of Hawaii	3rd Party Renter/Att	John K. Gerard		11/28/23	Y	

*Note:
If N for non-concurrence, submit comments and issues as an Attachment to the Report. Please include all areas of non-concurrence, as well as areas of agreement.

QUESTION-17
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 3 (SPECTRUM)
ATTACHMENT A
PAGE 1 OF 2

SPECTRUM OCEANIC, LLC (CHARTER COMMUNICATIONS) RESPONSE TO QUESTION 17—ATTACHMENT A

HCR 41 Double Poles

Report of Hawaiian Electric's Responses to the Commission Regarding Double Poles

Attachment A

Concurrence Sheet

Note: This list must include ALL entities who have attachments on Double Poles - Joint Pole Owners (HECO, MECO, HELCO, State of Hawaii, City and County of Honolulu, County of Hawaii, and County of Maui), Hawaiian Tel, and all 3rd Party Renters/Attachers.

Entity Name	Entity Type (Joint Pole Owner or 3rd Party Renter/ Attacher)	Entity Point of Contact (POC) Name	POC Signature indicating Review of Hawaiian Electric's Report of Responses to the Commission	Date Signed	Concur with Hawaiian Electric's Report? (Y/N) *See Note	Name of Attachment Submitted
Spectrum Oceanic, LLC	Attacher	Mitchell Miyoshi		11/27/23	Spectrum's Answer to Question 17 is based on a "draft" of the Companies' Final report that the Companies provided to Spectrum on 11/24/23. Given the short period of time Spectrum has had to review the Companies' draft (the Companies requested that Spectrum provide Attachment A to the Companies on 11/27/23) and that the report is in draft form, Spectrum reserves the right to	N/A

QUESTION-17
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 3 (SPECTRUM)
ATTACHMENT A
PAGE 2 OF 2

					amend its Answer to Question 17, if and when it receives the Final report, at which time it will also execute Attachment A. In addition, Spectrum is unable to concur or not concur with any of the Companies' responses that are based on its internal information. Spectrum concurs, however, with the Companies' responses to questions 6 through 9, which involve its pole attachment agreements with attachers, with the exception that Spectrum's pole attachment agreement with the Companies provides for default (§2.9—Compliance with Agreement and Guidelines) in the event Spectrum does not effectuate a transfer in 30 days (§9.2.2—Pole Replacements).	

*Note:
If N for non-concurrence, submit comments and issues as an Attachment to the Report. Please include all areas of non-concurrence, as well as areas of agreement.

QUESTION-17
DOUBLE POLE REMOVAL STATUS
ATTACHMENT 4 (COUNTY OF HAWAII)
ATTACHMENT A
PAGE 1 OF 1

HCR 41 Double Poles

Report of Hawaiian Electric's Responses to the Commission Regarding Double Poles

Attachment A

Concurrence Sheet

Note: This list must include ALL entities who have attachments on Double Poles - Joint Pole Owners (HECO, MECO, HELCO, State of Hawaii, City and County of Honolulu, County of Hawaii, and County of Maui), Hawaiian Tel, and all 3rd Party Renters/Attachers.

Entity Name	Entity Type (Joint Pole Owner or 3rd Party Renter/ Attacher)	Entity Point of Contact (POC) Name	POC Signature indicating Review of Hawaiian Electric's Report of Responses to the Commission	Date Signed	Concur with Hawaiian Electric's Report? (Y/N) *See Note	Name of Attachment Submitted
County of Hawaii	Joint Pole Owner	Abraham Sylvester	Abraham Sylvester	11/27/23	Y	QUESTION-16-COH Response

*Note:
If N for non-concurrence, submit comments and issues as an Attachment to the Report. Please include all areas of non-concurrence, as well as areas of agreement.

Appendix C – Attendance Summary from December 11, 2023 Status Update Meeting

Stakeholders in Attendance	Number of Verified Representatives
Hawaiian Electric Companies	11
Hawaiian Telcom	3
Charter Communications	2
Verizon / Verizon Wireless	3
AT&T	3
City and County of Honolulu	1
State of Hawaii, Department of Transportation	1
State of Hawaii, Department of Commerce and Consumer Affairs, Division of Consumer Advocacy	2
Commissioners and Commission Staff	11

STIPULATED COMPREHENSIVE DOUBLE POLE REMOVAL PLAN

WHEREAS, the Hawaii State Legislature passed *House Concurrent Resolution 41 and House Resolution 45* during its 2023 Session urging the Commission to open a new proceeding relating to the removal of abandoned or double utility poles, lines, and equipment (See, HCR 41), and to reevaluate and adopt administrative rules relating to the removal of abandoned or double utility poles, lines, and equipment (see, HR 45).

WHEREAS, the Commission issued a *Report to the 2024 Legislature Pursuant to House Concurrent Resolution 41/House Resolution 45 (2023)* in December 2023 in which the Commission committed to "working with Hawaiian Electric and Stakeholders to establish a clear plan for removing existing and future double poles, and opening a proceeding on the double pole removal process improvements to meet the intent of HCR 41 and HR 45."

WHEREAS, City and County of Honolulu ("C&C"); State of Hawaii, Department of Transportation ("DOT"); Hawaiian Telcom, Inc. ("HT"); Spectrum Oceanic, LLC ("Charter"); Cellco Partnership D/B/A Verizon Wireless ("Verizon"); AT&T Corp.; New Cingular Wireless PCS, LLC ("AT&T Mobility") (collectively, "Stakeholders"), and Hawaiian Electric are parties to this Stipulation (collectively, the "Parties");

WHEREAS, the Parties had four status meetings with the Commission and Consumer Advocate and 13 subcommittee meetings, to which the Consumer Advocate attended the meetings until April 8, 2024. From April 11, 2024, Hawaiian Electric and the Stakeholders conducted meetings to discuss the Stipulated Plan. See Table 1 from Application.

WHEREAS, Hawaiian Electric led the effort to discuss challenges and obstacles with respect to double poles, and also discussed possible process improvements, while recognizing,

the Commission's jurisdiction over only some of the Parties, and the Federal Communications Commission's regulatory authority over pole attachments.

WHEREAS, Hawaiian Electric and the Stakeholders have agreed to the following Stipulated Comprehensive Double Pole Removal Plan ("Stipulated Plan"),[1] intended to improve communication and coordination among Parties, thereby expediting the volume of double pole removals and preventing the creation of another substantial backlog. The plan includes a number of strategic initiatives and improvements that apply to backlog double poles, preventive double poles, standard transfers, and non-standard transfers.

I. STIPULATED PLAN

Hawaiian Electric, HT, and C&C commit to meeting the schedules proposed in their respective short-term and long-term plans that will eliminate the original backlog of pre-2018 double poles and prevent sizable backlog of double poles going forward. The following stipulated process changes are intended to enable the Parties to execute their short-term and long-term plans set out further in Exhibits C-E and prevent future sizeable backlog of double poles.

A. <u>Communication Improvements via Alden ONE</u>

1) *Use of shared double pole database*.

Currently there is no single database for tracking double pole equipment and transfers. For example, notices for pole replacements, equipment transfers, and customer complaints are provided manually via email, phone, and/or letter. This disparate and manual exchange and input of information has led to incomplete records and inefficiencies in communications among some Parties and hindered coordinated efforts between them.

[1] Nothing herein is intended to supersede existing pole attachment license agreements or joint ownership agreements between Hawaiian Electric and the Stakeholders. Not all the Stipulations are applicable to or involve all Stakeholders and Stakeholders agree only to those stipulations to which they have agreed as indicated herein.

Hawaiian Electric currently uses Alden ONE, an online portal and database software tool, to enable Hawaiian Electric to communicate with attachers, engineers and contractors to help standardize, automate and optimize its pole attachment audit and remediation efforts. Through subcommittee meetings, it was clear that many of the challenges associated with transfers and removal of double poles stems from lack of an automated and universally accessible communication tool for all Parties to use. Given that most Stakeholders are familiar with Alden ONE because they are also involved in the pole attachment audit and remediation efforts, Hawaiian Electric suggested using Alden ONE for double pole coordination and communication efforts. Alden ONE would not replace each Stakeholders' internal processes and systems for tracking, scheduling, and completing pole transfers; Alden ONE will simply be an additional tool used by all Parties to improve the process and create a coordinated tracking and reporting environment to keep all Parties aware of issues that may impact scheduling.

STIPULATION 1: As part of the Stipulated Plan, the Parties agree to the concept of using Alden ONE, at no cost to the Stakeholders.[2] This platform will be employed to, among other things, manage communications matters related to double poles: 1) scheduling of transfers, 2) completion notices, 3) customer complaints, 4) joint permit progress, 5) timeline tracking, 6) dashboard-style reporting, and any other communication Hawaiian Electric and Stakeholders discover and agree to as necessary. Additionally, it will be used for all other communications between the parties essential for facilitating the execution of the pole transfer plans. Alden ONE system will be password protected and dissemination of access will be restricted to those that the Stakeholders identify need access and personnel at Hawaiian Electric managing the double pole removal program. The Parties also acknowledge that the Commission, Consumer Advocate, and

[2] There are no incremental costs associated with expanding Alden One for double poles, as a result Hawaiian Electric is able to offer this solution at no cost to the Stakeholders.

other entities outside this effort (*e.g.*, Board of Water) may also benefit by having access to certain reporting dashboards or scheduling layers as requested in the future and agreed to by the Parties. Hawaiian Electric agrees to hold training sessions for all Stakeholders on how to use Alden ONE and approve access to the database for Stakeholder personnel that are identified as necessary parties.

2) *Automated Notice of Intent ("NOI") Will Create Efficiencies*

Hawaiian Electric issues NOIs to C&C, DOT, HT and Charter when a new pole is scheduled to replace an old pole and an Erection Notice ("EN") when a pole is erected at a new location. The NOI includes specific details about the exact location of the new pole and is used to help applicable Stakeholders decide if they want to take an ownership interest in or attach to the new pole. NOIs prove particularly beneficial to HT and Charter, as these early notifications allow their engineering teams to provide valuable information to Hawaiian Electric regarding the correct pole sizing and optimal positioning of the new pole. This guidance can help facilitate quicker removal of the old pole.

The Parties also explored the possibility of using the NOI process for addressing riser pole replacements. Riser poles are poles that have risers that transition facilities from aerial to underground support structures. Given that underground infrastructure is static, relocating facilities to a new pole location incurs significant cost and time delays, often extending over many months, to navigate through civil designs and obtain necessary governmental permits. Early engineering discussions enabled by the NOI process will facilitate Stakeholder discussions on the strategic placement of the new pole where there are risers.

In general, Hawaiian Electric tries to send NOIs by email to applicable Stakeholders involving pole replacements approximately 30-45 days in advance. Because the current NOI

process is manual, sometimes there are delays in Hawaiian Electric issuing the NOI and delays by some attachers responding to the NOIs. This has been challenging for C&C due to the sheer volume of NOIs received and C&C staffing issues, including different people stepping in and out of the role. See Exhibit E for more details on C&C's short- and long-term plans that address this issue.

The EN is important because it notifies Stakeholders that the new pole has been installed and drives the schedule for transferring attachments to the new pole. There have been instances where the NOI was received at the same time as the EN, leaving no opportunity to optimize the requirements and positioning of the replacement pole and instead resulting in an unnecessary double pole situation. Automation of these notices through Alden ONE can help minimize these delays.

STIPULATION 2: As part of the Stipulated Plan, applicable Stakeholders agree to the concept of using Alden ONE to optimize the NOI and EN process.

3) *Stakeholders to Timely Alert Hawaiian Electric of Transfer Completions*.

Through subcommittee discussions, the Parties discussed that timely completion notices are critical to officially close out a double pole. Hawaiian Electric requires these completion notices because they install and replace poles and are responsible for coordinating with HT for pulling the old, bare pole once all transfers are complete.

STIPULATION 3: As part of the Stipulated Plan, the applicable Stakeholders agree to the concept of using Alden ONE to timely notify Hawaiian Electric within 10 days of transferring its equipment from the old pole to the new pole so that the bare pole can be removed.

4) *Regularly Scheduled Meetings and Action Items*.

Hawaiian Electric has established standing monthly meetings with HT and Charter to discuss progress and raise any issues related to double poles on a monthly basis. HT and Charter also periodically meet to discuss certain double pole issues.

STIPULATION 4: As part of the Stipulated Plan, Hawaiian Electric, HT, and Charter agree to use Alden ONE to input any action items that may impact the double pole schedule or plans that result from their standing meetings, and to use these meetings to track status of the short- and long-term pole transfer plans and work together toward keeping to the committed timelines.

B. **Efficiencies Gained by Sharing Resources**

1) Shared Contractors.

There are a limited number of qualified contractors on each island eligible to perform transfers. Certain Parties with union labor have discussed the many sensitivities with using union crews to do transfers and the additional difficulties associated with moving small cell wireless facilities, wireline attachments that belong to the federal government, and streetlights. Hawaiian Electric keeps a list of qualified contractors that may perform work in the communication space, and several of those contractors are also used by HT and Charter. The standing practice has been that each Stakeholder uses their crew or contractor to move only their own piece of equipment. Furthermore, through subcommittee meetings the Parties have learned that some Stakeholders may have limited ability to share crews or contractors because of specific union or federal government agreements. As a result, it is often the case that a single contractor (or combination of contractor and crew) could be hired by several different Stakeholders to make separate trips to the same pole to transfer the different Stakeholders' attachments. Sharing crews

and contractors, when applicable and feasible, would speed up the removal of double poles. That concept is referred to as "One-Touch." While it is not a new concept, it is not often used in Hawaii.

For HT standard transfers, Hawaiian Electric's and HT's Operating Agreement and Pole Licensing Agreement allow Hawaiian Electric to transfer HT's equipment.[3] Under certain circumstances Hawaiian Electric and HT may also move Charter's equipment. Hawaiian Electric and the County of Hawaii also have an agreement in which Hawaiian Electric transfers the County of Hawaii's streetlights.

STIPULATION 5: As part of the Stipulated Plan, applicable Stakeholders agree to share their respective approved contractor list and use reasonable efforts to allow certain qualified contractors to move their equipment at the same time that such contractors are moving equipment of other Stakeholders, and then be invoiced accordingly. Applicable Stakeholders consent to exchange their respective list of approved contractors with Hawaiian Electric, granting permission for these qualified contractors to relocate their equipment following proper notification and approval/authorization.[4] This process will have a sizeable positive impact on the double pole removal process. The Parties agree to continue discussions regarding the best way to utilize approved contractors and crews in the spirit of One Touch, recognizing that not all Stakeholders may be able to participate, and that not all circumstances will allow for it.

---

[3] Hawaiian Electric and HT have a Pole Licensing Agreement and an Operating Agreement that cover the responsibility of each Party to perform the transfer of HT's equipment and removal of the bare pole in different circumstances. Hawaiian Electric is responsible for transferring HT's equipment to a new pole for "HT Standard Transfers," when a pole is replaced when the equipment will be located in approximately the same position on the new pole and requires no splicing and does not result in an interruption of HT service to HT's customers. HT is responsible for transferring all of its equipment in "HT Non-Standard Transfers," which typically involve splicing and/or other more complex elements to the transfer. The definitions, including illustrative examples of both types of transfers, is set forth in the parties' Pole Licensing Agreement in Section 9 of Annex 1 to the contract.

[4] The qualified contractor list may be modified in the future based on agreement by all Parties to add or remove contractors. This list is intended exclusively for operational use and shall remain confidential, not for public disclosure.

- Hawaiian Electric has agreed to issue a new Request for Proposals to its qualified contractors to include the One Touch concept.
- HT and Charter have agreed to explore a One Touch approach to non-standard transfers, where feasible.
- C&C has agreed to continue discussion about the One Touch concept for streetlights.
- Both wireless carriers, Verizon and AT&T recognize their small cell wireless antennas are much more complicated to move but agree to continue conversations. Thus far, they have agreed to the following:
    - Any contractors moving Verizon antennas would need to obtain Verizon Wireless approval.
    - AT&T Mobility is agreeable to having qualified contractors complete this work as long as AT&T Mobility preapproves the contractors and is provided an opportunity to flag unique concerns or circumstances associated with the subject facility.
- AT&T Corp. has limited ability to agree to use One Touch due to the fact that their customer is often the federal government, which has ample restrictions against others moving their equipment. AT&T Corp. agreed to continue discussions and is committed to cooperate with other Stakeholders to help complete transfers in a timely fashion.

2) *Union Work.*

In addition to a list of approved contractors, some of the Parties have discussed the important role their respective union crews can play in performing transfers to maximize efforts in removing the backlog and also to help prevent new double pole buildups. Given the

complexities inherent in each union's bargaining agreements, finding a universally applicable and acceptable solution remains challenging. Hawaiian Electric has had discussions with its union, IBEW Local 1260, but many more discussion will be necessary before any formal changes can be implemented. Through initial discussions, Hawaiian Electric's union has expressed a willingness to perform streetlight transfers on Oahu, similar to the existing and longstanding streetlight transfer work it already does in Hawaii County. Hawaiian Electric's union has similarly expressed willingness to perform HT standard transfers to prevent new double poles. Specific, they may be able to perform HT standard transfers because they are already at the site installing the new pole. Having IBEW Local 1260 move HT standard equipment and potentially streetlights at the same time is in the spirit of One Touch and would allow the crew to remove the old pole immediately after the transfer is complete. With other unions, it may not be as simple or logical to apply the One Touch concept.

STIPULATION 6: As part of the Stipulated Plan, Hawaiian Electric and Stakeholders agree to continue discussions on the best way to utilize approved contractors, crews, and respective unions, as feasible in the spirit of One Touch. The Parties recognize that not all Stakeholders may be able to participate, and that not all circumstances will allow for it.

3) Non-Standard Transfers.

The term "non-standard transfers" is not widely recognized within the telecommunications sector. The concept of non-standard transfers was introduced to differentiate between the types of transfers Hawaiian Electric would handle (HT standard transfers) and those that HT would handle (HT non-standard transfers). Non-standard transfers often involve intricate procedures not typical of usual operations, such as cutting and splicing cable, transferring and re-mounting large equipment boxes, moving equipment powered by commercial power sources, riser pole

transfers, and engaging in other complex facilities transfers that necessitate special skills beyond those of a standard Line construction worker.

a. *Cross-Arms*.

Hawaiian Electric uses and maintains cross-arms for its distribution or transmission systems in the electric space only. Because Hawaiian Electric does not use communications cross-arms, Hawaiian Electric requires the attachers place and maintain the cross-arms when placing a new pole. This has contributed to cross-arm ownership and maintenance questions that have yet to be addressed.

STIPULATION 7*:* As part of the Stipulated Plan, HT and/or Charter have agreed to install cross arms required for non-standard transfers where the existing pole has cross-arms. HT agrees to 1) manage and coordinate all activities required to complete the transfers from the old pole to the new pole where cross-arms are involved, and 2) communicate with Charter about transfer completion dates or alternate transfer completion dates, subject to mutual agreement between HT and Charter.

For HT's non-standard transfers, HT or Charter will place the new cross-arm(s) in the same position on the new pole as the old pole being replaced. HT will supply all cross-arms or reimburse Charter for any cross-arms that they place. HT and Charter also agree to continue exploring opportunities to increase efficiencies and reduce costs such as one touch transfer opportunities.

b. Joint Permits

The subcommittee discussed situations where one pole transfer involving multiple risers could require multiple permits from the C&C. For example, if two Stakeholders both have a riser on a non-standard pole, each would file their own permit to relocate risers from each

company's independent underground infrastructure to the new location of the pole. This creates more work for C&C, which is a concern given how overwhelmed C&C already is with permit reviews. This duplicative permit review, approval, and subsequent civil work can create extra delays in resolving transfers with riser poles.

Consolidation of this work under one permit for multiple companies was discussed as a means to reduce time and efforts by both the applicants and the reviewers. However, further discussion is required to work out the details and feasibility, as all companies have their own consultants and civil engineers so consolidation of work, lead responsibilities, and cost sharing will all need to be worked out. This joint effort could potentially be coordinated through Alden ONE.

STIPULATION 8: As part of the Stipulated Plan, Hawaiian Electric, HT, and Charter will attempt to file one joint permit, where possible, to eliminate the extra burden placed on C&C to review multiple riser requests at the same pole. This joint effort could be communicated through Alden ONE. These same companies will explore the feasibility of similar coordinated work for riser poles on Maui, Hawaii Island, and with the State Department of Transportation.

c. Improvements to Trenching Permit Verification Process

When completing non-standard transfers, permits are required to move risers and other equipment in the right-of-way. In particular, a trenching permit from the C&C is required when excavating, breaking, digging, disturbing, or undermining any city highways, streets, thoroughfares, alley or sidewalk, including streets or roads that are city maintained, but privately owned. C&C agencies and other utility stakeholders sign off on the trenching permit applications as shown below in Table 1.

Currently, C&C permit runners need to go to the various agencies listed and obtain wet signatures to verify underground conditions, availability, and/or open space, among other things. This is a time-consuming process and delays completion of transfers involving multiple risers. The Parties recognized improvements could be made to the permit runner process, especially when some of those on the list are Stakeholders to this process. Currently, C&C is facilitating discussions with Department of Planning and Permitting ("DPP"), Department of Transportation Services ("DTS"), and Department of Design and Construction ("DDC") to see if this Alden ONE approach is an acceptable solution to help streamline the permitting process.[5]

Table 1.

AGENCY CLEARANCES	SIGNATURE	DATE	ADDRESS	PHONE NO.
DPP, Wastewater Branch			650 So. King St., FMB, 1st Flr	768-8210
DTS, Traffic Signal			650 So. King St., FMB, 2nd Flr.	768-8388
DDC, Street Lighting			650 So. King St., FMB, 11th Flr.	768-8431
BWS, Customer Care			630 So. Beretania St., 1st Flr.	748-5460
Hawaiian Electric Com., Inc., Engineering Division			820 Ward Avenue, 4th Flr.	543-5654
Hawaiian Telcom, Excavation			1177 Bishop St., Lobby	546-5654
Gasco., Inc., Maps & Records			515 Kamakee St., 1st Flr.	594-5575
Spectrum, Engineering & Construction			200 Akamainui St. haw.engineering.research@charger.com	625-8443
DFM, Division of Road Maintenance (if trenching 200 linear feet or more)			99-999 Iwaena Street, #214	786-3800

[5] The Parties acknowledge that the C&C is willing to coordinate conversations with various permitting departments on Oahu, but other conversations with the counties of Maui and Hawaii will need to take place with respect to permitting.

STIPULATION 9: As part of the Stipulated Plan, applicable Stakeholders—C&C, State, Hawaiian Electric, HT, and Charter—agree to the concept of using Alden ONE to self-confirm pre-clearances instead of adding the step of requiring a C&C permit runner. Parties can internally review their records to determine if they have existing underground facilities that could be impacted by the excavation work and indicate so in Alden ONE. Alden ONE will then issue a pre-clearance notice that could be attached to the trenching permit applications, eliminating the need for five (5) separate signatures. These same companies will explore the feasibility of using Alden ONE for similar plan reviews for Maui, Hawaii Island, and with the State Department of Transportation projects.

C. **Additional Improvements Impacting Double Poles**

1) *Tagging*.

Hawaiian Electric and applicable Stakeholders agree that tagging of their respective telecommunications and cable wireline equipment[6] is important so that the Parties and the public can readily identify what equipment belongs to whom. This is important for numerous reasons in the context of double pole removals, including contacting necessary Stakeholders in cases of emergency, for coordination of equipment transfers, and for reporting and/or invoicing once transfers are complete. Stakeholders tag new equipment, but some existing equipment may not have tags, and only a limited number of Stakeholders provide tags to contractors to install on their behalf. Hawaiian Electric expressed difficulties in identifying existing equipment out in the field and experienced delays in performing HT standard transfers due to not knowing whose equipment was attached to a particular pole.

[6] Not all equipment attached to Hawaiian Electric poles requires tags. C&C and DOT do not need to tag streetlight equipment but have agreed to tag their telecom wireline equipment. Wireless small cell antennas by AT&T Mobility and Verizon are also not required to tag their antennas. There are other identifying markers on small cell antennas. The tagging requirement is primarily to discern wireline cables and equipment.

STIPULATION 10: As part of the Stipulated Plan, applicable Stakeholders agree to tag their telecommunications and cable wireline equipment with their designated color for all new double pole installations. Applicable Stakeholders who are not already doing so, also agree to add a tag to older, existing equipment out in the field when they are doing transfers or other work on a pole where existing installations are found. Going forward, applicable Stakeholders agree to provide tags to approved contractors and/or field employees or unions—as relevant to individual Stakeholders— to tag existing equipment on their behalf.

a. Tag Identifiers. The designated color coding of tags is listed at Table 2.

Table 2 – Color Tagging Master List

	CARRIER	TAG COLOR	STRIPE COLOR	TEXT COLOR
1	Level 3/Century Link/Lumens	Red	None	Black
2	Hawaiian Telcom	Orange	None	White
3	AT&T Corp (for non-military installations)	White	None	Black
4	Servpac	Green	None	White
5	AT&T Corp (for military installations on Govt Property only)	Green	None	Black
6	Sprint	Silver or Gray	None	Black
7	Spectrum	Blue	None	White
8	Hawaiian Electric	Yellow	None	Black
9	Crown Castle	Purple	None	White
10		Black	None	White
11	State DOT Hwys	Pink	None	Black
12		Red	White Stripes at both ends	White
13		Orange	White Stripes at both ends	White
14		White	Black Stripes at both ends	Black
15		Green	White Stripes at both ends	White
16		Silver or Gray	Black Stripes at both ends	Black
17		Blue	White Stripes at both ends	White
18	C&C of Honolulu DTS	Yellow	Black Stripes at both ends	Black
19		Black	White Stripes at both ends	White
20		Pink	Black Stripes at both ends	Black

b. Additional Tagging.

STIPULATION 11: As part of the Stipulated Plan, Hawaiian Electric and applicable Stakeholders agree to include tagging requirements in their agreements with approved

contractors, to the extent they do not already do so. Approved contractors will have to stock the tags and keep track of how many are used or when more are needed.

2) *Vegetation Management*.

Overgrown vegetation can slow down double pole transfers and removals. The subcommittee discussed that vegetation management can speed up pole transfers.

STIPULATION 12: As part of the Stipulated Plan, as specifically related to double poles, Hawaiian Electric and the Stakeholders agree to make efforts to timely respond to reasonable vegetation management requests by Hawaiian Electric necessary to assist in in double pole transfers. The Parties also agree to the concept of using Alden ONE to communicate and track vegetation management related to double poles.

STIPULATION 13: C&C recognizes excessive vegetation growth may impact the integrity of the poles that support its streetlights and traffic signal cables and has agreed to enhance its proactive vegetation management program by trimming back vegetation a reasonable distance beyond its allocated space on the pole with the tools its crews have on hand.[7]

STIPULATION 14: As part of the Stipulated Plan, the Parties agree to continue discussing vegetation as it relates to double poles.

3) *Removal of Abandoned Cables*.

Certain wireline Stakeholders may have abandoned cables no longer in use that remain on Hawaiian Electric's distribution system. As discussed in subcommittee meetings, abandoned equipment can complicate transfers. In addition, they should not be transferred to new poles when a pole is replaced.

[7] Please note that C&C electricians are not licensed or professional landscapers or tree trimmers, and major pruning would need to be contracted out and may eventually become part of any future discussion on a state-wide proactive vegetation management program.

STIPULATION 15: As part of the Stipulated Plan, the Stakeholders agree to not knowingly transfer abandoned lines in the double pole transfer process to the extent possible. The Stakeholders also generally agree to remove any unused and abandoned cables and equipment within a reasonable time of discovery. Specific to each Stakeholder:

- HT agrees to remove known abandoned cables and equipment (not including poles), no longer in use within 60 days or 60 days after all regulatory requirements have been fulfilled, whichever is later.
- Charter currently identifies abandoned cables in the normal course of its employees' work in the field. Charter uses its own employees or hires a contractor to remove the cables typically within 60 days. Charter agrees to continue this effort.
- C&C agrees to continue its practices of removing known C&C abandoned cables when new replacement cables are installed.
- AT&T Corp. agrees to remove abandoned cables as necessary based on current requirements for aerial and underground facilities.
- This does not impact wireless telecom providers such as AT&T Mobility or Verizon.

The Parties also agree to explore using Alden ONE to replace any current detachment notices.

D. Penalties for Non-Compliance

The Parties designed the Stipulated Plan to centralize all status and performance metrics in Alden ONE, as well as other key improvements to lower the cost of removals by re-bidding contractor work, obtaining union approval to perform transfers where appropriate, and by agreeing to share contractor costs. Thus, as currently designed, the Alden ONE platform will provide transparency about the Parties' performance and, therefore, accountability. Together, the Parties believe that this Stipulated Plan will generate the performance desired in HCR 41.

STIPULATION 16: The Parties agree that their collaborative efforts and agreements made herein will mitigate the conditions that lead to delays in pole transfers and that they will be able to self-police to ensure timely double pole transfers and removals. The Parties agree that they will periodically discuss the need for penalties in the future, if new processes do not result in more streamlined removals. [8], [9],[10]

E. Funding

The Parties discussed the additional costs that would be incurred for agreeing to, carrying out, and administering this Stipulated Plan (e.g., the incremental costs for Parties and/or their contractors, to remove abandoned lines when performing a transfer, and hiring additional staff) and agreed that funding is a critical component to the success of the plan. The Parties have not reached a stipulation as to this issue.

[8] Verizon does not agree by this stipulation that penalties will be necessary, but agrees to revisit the issue of whether such penalty provisions may be necessary in the future. Verizon notes that it is attached to a small number of Hawaiian Electric's poles, has not engaged in any double pole transfers, and believes that the stipulations in the plan may only minimally affect it in the future. However, Verizon has participated in the spirit of supporting the State's goals for eliminating the double pole backlog.

[9] Charter does not agree by this stipulation that any penalties are necessary or appropriate and does not agree to having future discussions regarding penalties.

[10] Hawaiian Telcom does not agree to this stipulation. However, HT will commit to engaging in discussions on penalty measures and other remedies with the Commission and Consumer Advocate should the self-regulation of the plan prove ineffective.

IN WITNESS WHEREOF, the parties have executed this Stipulated Comprehensive Double Pole Removal Plan as of the date of this application.

CITY AND COUNTY OF HONOLULU

/s/ (see below for signature)

for Haku Milles
Director
Department of Design and Construction
City and County of Honolulu

STATE OF HAWAII DEPARTMENT OF TRANSPORTATION

/s/ Ryan Nakata

Ryan Nakata

Highways Division
State of Hawaii Department of Transportation

AT&T CORP.
NEW CINGULAR WIRELESS PCS, LLC ("AT&T MOBILITY")

/s/ David Collier

David Collier
Lead Regulatory Relations
AT&T Services, Inc.

CHARTER COMMUNICATION

/s/ Gregg Fujimoto

Gregg Fujimoto
Senior Vice President
Charter Communication

VERIZON WIRELESS

/s/ Jane Whang

Jane Whang
Attorney for Verizon
Public Policy, Law and Security
Verizon

HAWAIIAN TELCOM

/s/ Daniel Masutomi

Daniel Masutomi
Senior Director
Strategic Planning
Hawaiian Telcom

HAWAIIAN ELECTRIC COMPANY, INC.

/s/ Christian Whitney

Christian Whitney
Director
Pole Infrastructure Enterprise
Hawaiian Electric Company, Inc.

IN WITNESS WHEREOF, the parties have executed this Stipulated Comprehensive Double Pole Removal Plan as of the date first written above.

CITY AND COUNTY OF HONOLULU

/s/ Digitally signed by Bryan Gallagher
Date: 2024.04.30 13:27:59 -10'00'

for Haku Milles
Director
Department of Design and Construction
City and County of Honolulu

STATE OF HAWAII DEPARTMENT OF TRANSPORTATION

/s/

Ryan Nakata

Highways Division
State of Hawaii Department of Transportation

AT&T CORP.
NEW CINGULAR WIRELESS PCS, LLC ("AT&T MOBILITY")

/s/

David Collier
Lead Regulatory Relations
AT&T Services, Inc.

CHARTER COMMUNICATION

/s/

Gregg Fujimoto
Senior Vice President
Charter Communication

Hawaiian Electric's Double Pole Removal Plans

I. INTRODUCTION

Included herein is Hawaiian Electric's proposed plans for removal of backlog HT standard transfer double poles, broken out into its short-term plans for the remainder of 2024, as well as its longer-term plans for the remaining four (4) years of backlog double pole removal. Hawaiian Electric is committed to the removal of existing backlog HT standard transfer double poles as well as working collaboratively with other Stakeholders to maximize efficiencies in an effort to minimize the creation of new preventive double poles.

The figures set forth below for both short and long-term removals are projections based on Hawaiian Electric's current estimates for removal. As many of the process improvements set forth in the Stipulated Plan come into practice, combined with efficiencies Hawaiian Electric is planning on gaining by enhancing its agreements and pricing with its contractors, Hawaiian Electric is hopeful that it will be able to exceed the pace of backlog HT standard transfer double pole removal for its long-term projections.

II. HAWAIIAN ELECTRIC'S SHORT-TERM (2024) DOUBLE POLE REMOVAL PLAN

On March 15, 2024, Hawaiian Electric and Hawaiian Telcom submitted their short-term double pole removal plan for 2024, quarter 2 (Q2) and quarter 3 (Q3) to the Commission. Hawaiian Electric's plan included a total of 300 specific backlog HT standard transfer double poles for each of Q2 and Q3. The 600 specific backlog HT standard transfer double poles were further broken down to 200 double poles on Oahu, 50 double poles on Hawai‘i, and 50 double

poles on Maui, for each of Q2 and Q3.[1] As shown in Table I below, Hawaiian Electric slowed its progress in 2024 Q2 and is targeting to complete the balance of backlog HT standard transfer double poles in Q3 and Q4 under a revised contract, still removing a total of 600 by end of Q3. Hawaiian Electric plans to complete the removal of approximately 1,300 backlog HT standard transfer double poles by year end.

Table I – 2024 Backlog HT Standard Transfer DP Removal Plan

ISLAND	YEAR				
	2024 Q1 (Act)	2024 Q2 (Est)	2024 Q3 (Est min)	2024 Q4 (Est min)	2024 TOTAL (Est min)
Oahu	270	236	158	158	822
Hawaii	0	0	133	133	266
Maui	0	0	104	104	208
Subtotals	**270**	**236**	**395**	**395**	**1,296**

III. HAWAIIAN ELECTRIC'S LONG-TERM (2025-2028) DOUBLE POLE REMOVAL PLAN

At the end of 2024, when Hawaiian Electric removes the targeted 1,296 backlog HT standard transfer double poles shown in Table I above, Hawaiian Electric will have removed close to 4,300 backlog HT standard transfer double poles since it started the backlog transfers and removals in 2019. Hawaiian Electric will then have an estimated 5,148 backlog HT standard transfer double poles to remove for years 2025 through 2028. To achieve this, Hawaiian Electric is targeting to remove 1,305 backlog HT standard transfer double poles in years 2025 through 2027, decreasing to 1,269 backlog HT standard transfer double poles in year 2028. These annual targets may change slightly as Hawaiian Electric continues to review and reconcile data from its

[1] Since the submittal to the Commission, Hawaiian Electric revised its Q2 and Q3 short-term plan as it prepares to issue a revised Request for Proposal ("RFP") with geographical quadrants of poles for the contractors to bid on, with an expectation of achieving lower contractor costs for per-pole standard transfers and double pole removals. The long-term impacts of the revised RFP and any resulting contracts is explained more below in discussion with Hawaiian Electric's long-term plans in Section III.

pole records and new audit information collected through Hawaiian Electric's pole attachment audit currently in progress. Table II below shows the annual targets of backlog HT standard transfers and removals, by island, for years 2025 through 2028.

Table II – 2025-2028 Backlog HT Standard Transfer DP Removal Plan

ISLAND	YEAR				
	2025 (Est min)	2026 (Est min)	2027 (Est min)	2028 (Est min)	TOTAL
Oahu	825	825	825	813	3,288
Hawaii	270	270	270	254	1,064
Maui	210	210	210	202	832
Subtotals	**1,305**	**1,305**	**1,305**	**1,269**	**5,184**

Throughout this process surrounding double poles, Hawaiian Electric has led extensive dialogue with all the attachers and has made progress in understanding the various obstacles that prevent the quick removal of double poles. Through these discussions, Hawaiian Electric and the Stakeholders have strategized on various efficiencies and improvements that will facilitate the removal of all double poles, both backlog and preventive. One of the most valuable tools that will help coordinate and streamline communication and identify progress and issues is the use of Alden ONE by all Parties to track double pole progress and removals. Hawaiian Electric anticipates that the use of the Alden ONE will significantly reduce the communication issues, progress monitoring, and streamline the transfer and removal process. Alden ONE will also be able to offer visibility into progress and issues surrounding the transfer and removal processes, so that if other process improvements need to be made, that Parties can identify them and discuss either informally or in ownership or license agreement renegotiations.[2] In addition to the uses

[2] In its license agreements with carriers, Hawaiian Electric remains aware that it cannot unilaterally impose any requirements and that it must work within its bargaining power to get parties to agree on any terms. Moreover, Hawaiian Electric remains sensitive to the fact that federal law and federal regulations by the Federal Communications Commission retain jurisdiction over the rates, terms, and conditions in its pole attachment license

and benefits set forth in the Stipulated Plan that will provide efficiencies for all Parties, the portal & database tool will provide Hawaiian Electric, as the majority owner and manager of the communication space, helpful tools to manage the attachments and the double poles.

Specifically, Stakeholders' transfer completions will be standardized in Alden ONE and therefore will allow Hawaiian Electric to verify completions and schedule bare removals for easily. Invoices will also be standardized and paid by all attachers in the same format, simplifying the billing and financial aspect for Hawaiian Electric. Additionally, the Quality Assurance/Quality Control report, which comprises and verifies the materials used by Hawaiian Electric for HT standard transfers and for which HT supplies to Hawaiian Electric, will be automatically created in Alden ONE, thus eliminating the manual entry and balancing of figures. Alden ONE will also be critically helpful in enabling Hawaiian Electric, as the owner and manager, to track and monitor progress, issues, communications, and evaluate enforcement under its contracts in a single, organized place. Accordingly, Hawaiian Electric anticipates that the joint use of Alden ONE as applied to double poles will significantly improve the efficiency of the process and thereby increase the pace of double pole removals.

In addition to the process improvements agreed to with the Stakeholders that the Company anticipates will streamline the removal of double poles, Hawaiian Electric is also issuing a revised RFP to various qualified contractors in an effort to lower the cost of per-pole HT standard transfers and double pole removals by providing bulk removal requirements. Doing so will help address the primary obstacle to the expeditious removal of double poles—limited funding. Lowering the cost of double pole removals will help enable Hawaiian Electric to reach its commitments for removal of backlog double poles and stay on top of preventive double pole

agreements, pursuant to 47 U.S.C. § 224. Accordingly, Hawaiian Electric may be limited in the extent of what it may require of attachers in its pole attachment agreements.

removals. Hawaiian Electric is currently drafting an RFP to issue to several qualified contractors and anticipates that by increasing the quantity of poles sent to contractors and grouping them geographically for efficiency, will enable contractors to provide lower bulk pricing, thereby decreasing the overall per-pole cost of removals. This should reduce the costs for long-term projections and will also increase the short-term removals for the remainder of 2024. If the Commission were to request state funding to supplement Hawaiian Electric's budget for double pole removal, that would have the potential of greatly speeding up the rate of double pole removals.

IV. UNION WORK ON PREVENTIVE DOUBLE POLES TO STREAMLINE REMOVALS

The IBEW 1260 generally supports performing One Touch equipment transfers when pole replacements are completed, so the old pole can be removed immediately, preventing new double poles from being created. This is the most efficient and cost-effective approach, as well as least disruptive, and contributes positively to the long-term plans in reducing and eliminating double poles. Accordingly, Hawaiian Electric and the IBEW are in early discussions on IBEW 1260 starting to help perform One Touch equipment transfers and double pole removals for preventive double poles in the future.

The IBEW 1260 recognizes that if it commits to performing this One Touch work, there are circumstances when either the telecommunication companies or contractors would be required to perform the One Touch transfers, such as but not limited to, non-standard transfers, standard transfers of large telecommunication cable bundles, transfers involving brittle equipment and corroded hardware, or other situations deemed unsafe for Hawaiian Electric crews.

V. FUNDING

Funding remains the primary obstacle to accelerating the pace of double pole removals. If these resource constraints were alleviated, it would increase Hawaiian Electric's ability to address and remove both backlog and preventive double poles. Given that the backlog double poles have a finite quantity and because Hawaiian Electric is under an obligation to remove all of them by 2028, as part of the Stipulated Plan, Hawaiian Electric requests that the Commission seek State funding in the amount of $500,000 per year for the next four (4) years, until the backlog removals are complete.

Introduction:

To address the backlog of non-standard double pole transfers, Hawaiian Telcom has developed a comprehensive removal plan that involves both short-term and long-term strategies, incorporating targeted removal goals, prioritization of complex cases, and systematic tracking.

Short-Term Plan (2024)

Objective: To remove 225 poles in Q2 and Q3, aiming for a total of 450 pole removals in 2024.

Strategy:

1. Prioritize poles based on safety concerns, community impact, and age of the double pole situation.
2. Engage with other utilities for coordinated effort on transfers to the new poles.
3. Streamline the removal process by identifying and preparing resources in advance.
4. Ramp resources and optimize processes in 2024 to transition into long-term plans

2024 Quarterly Targets

Quarter	Target Removals
Q1	50
Q2	75
Q3	150
Q4	175
Totals	**450**

Long-Term Plan (2025-2028)

Objective: To annually remove 1000 - 1200 double poles to address both the existing backlog and new cases.

Strategy:

1. Implement technology to improve tracking and management of double pole situations.
2. Develop Internal Service Level Expectations (SLEs) to drive results
3. Develop partnerships with local authorities and other utilities to streamline processes.
4. Optimize the non-standard transfers, focusing on efficiency and cost-reduction.
5. Invest in training and resources for handling complex transfers, like riser poles.

Annual Targets

Year	Target Removals (min)	Target Removals (max)
2025	1000	1200
2026	1000	1200
2027	1000	1200
2028	1000	1200
Totals	**4000**	**4800**

Key Steps for Long-Term Strategy:

1. Assessment of non-standard transfer requirements and development of specialized engineering teams to look at riser pole options.
2. Engagement in continuous training for teams on new technologies and methods for efficient transfers.
3. Ensure construction resources available on all islands based on scheduled removals.
4. Establishment of monitoring to tackle the highest priority cases first, considering both safety and community impact.
5. Assessment teams to optimize resources working in pole transfer areas that can be leveraged to complete pole transfers.
6. Reduce permit requirements or permit processing time by working with local government and other utilities.

Monitoring and Reporting

1. Implement a digital dashboard for real-time tracking of double pole situations, removal progress, and coordinating efforts with other utilities.
2. Monthly metric reporting to identify trends and opportunities for managers to drive results.
3. Quarterly reviews of progress against targets with adjustments as needed to meet annual goals.
4. Annual report to stakeholders detailing achievements, challenges, and strategies for the following year.

Conclusion

By employing a structured approach focused on prioritization, efficiency, and collaboration, Hawaiian Telcom can effectively reduce its backlog of double pole transfers through self-regulation and commitment.

CITY AND COUNTY OF HONOLULU COMMENTS

I. BACKGROUND

The City and County of Honolulu ("C&C") is a municipal corporation of the State of Hawaii. The C&C encompasses the Island of Oahu and provides a multitude of services to its residents and visitors on the island. One of these services to ensure that our streets work for all of us; safely moving people, while balancing the needs of all roadway users, such as pedestrians, bicyclists, transit riders, and motorists. Multiple C&C agencies are involved to ensure these roadways are designed, constructed, operated and maintained as efficiently as possible.

The Department of Design and Construction ("DDC") is the primary agency responsible for the implementation of the C&C's Capital Improvement Program. The DDC provides engineering expertise and advice to the C&C's program planning, design, construction, inspection, and land acquisition for public facilities, which includes new street light installations within the C&C right-of-way. The DDC is the primary point-of-contact to the Joint Pole Committee and processes the changeover requests received from the Hawaiian Electric Company.

The Department of Facility Maintenance ("DFM") maintains the roadways and bridges within the C&C right-of-way. The DFM also ensure that the 53,000 C&C street lights within the C&C are properly working for roadway users traveling at night. The C&C is the only county in the State of Hawaii that owns, operates and maintains its street lighting system with its in-house personnel. The DFM street light electricians also are responsible for changing over existing street lights from old joint poles to new joint poles when notified by DDC and when work load permits.

The Department of Transportation ("DTS") is responsible for of the City's multimodal transportation system. One of DTS' responsibility is the operation, maintenance, and coordination of Honolulu's (850) interconnected traffic signalized intersections, which utilize joint poles in its communications network. The DTS traffic signal electricians are primarily responsible for addressing traffic signal malfunctions and knock downs due to motor vehicle accidents. They also change over existing communications cables from old joint poles to new joint poles when notified by DDC and when work load permits.

II. SCHEDULE FOR DOUBLE POLE REMOVALS

The C&C understands that the Hawaiian Electrical Company is behind in its commitment in removing the backlog of double poles on the Island of Oahu. The C&C has increased its efforts in transferring street lights and traffic signal cables from old joint poles to new joint poles. The Hawaiian Electric Company has identified (477) poles as priorities for the C&C. At the end of the first quarter of 2024, the C&C has addressed (163) street lights and (21) traffic signal communications cable transfers and has identified (436) poles in which there are no traffic signal facilities. This clears the way for HECO to remove the old joint poles. By the end of the second quarter, the C&C plans to address another (120) street lights and investigate the remaining (20) poles for traffic signal facilities. By the end of the third quarter, the C&C plans to address (120) street lights. The remaining street lights on the priority list should be addressed by the end of the calendar year. The priority list does not include new change over requests, which the C&C will also continue to work on.

In addition to the priority list, the Hawaiian Electric Company has identified over 3,800 "paper" notices that have not yet been cleared. C&C staff is manually sorting through these old notices and periodically reporting the completion status to the Hawaiian Electric Company. This

task should be completed by the end of the calendar year. The C&C will continue to work with the Hawaiian Electric Company in its plans to address the backlog of double poles over the next five years.

III. C&C SUPPORT OF STRATEGIC INITIATIVES AND IMPROVEMENTS

The process of addressing the double pole issue has been very challenging for the C&C with its limited resources and multitude of other responsibilities. As such, the C&C supports improvements to the current antiquated process.

One area of improvement is a having a centralized software platform, such as Alden ONE, to improve communications among all of the stakeholders. This platform should allow the stakeholders to track and report the progress of the double pole transfers. The platform should be able to identify the individual joint poles by GPS coordinates to make it easier for field crews to locate, should include billing addresses for electric meters attached the joint poles for reference, should include information on owners of any risers attached to the joint poles, should include any traffic signs attached to the joint poles, and should include photos of the poles showing the different attachments. The platform should be searchable and sortable so that work on certain streets or neighborhood can be grouped together. This should reduce the number of times crews need to go back to these streets and neighborhoods, making this process more efficient. The C&C is concerned about the security and the protection of its assets. As such, the platform should be password protected to limit access to sensitive information. All stakeholder should receive proper and periodic training on this platform, in order for it to effectively communicate with all stakeholders. The C&C understands that there will be some upfront costs in implementing the platform and support the securing of outside funding. At this time, the C&C

is willing to contribute directly in funding a portion of the development of this software and suggests that such costs be included as part of the annual maintenance costs.

In addition to the centralized communications system, the C&C is willing to participate in quarterly meetings to continue the discussion on double poles.

One obstacle in the timeliness in transferring communications cables is identifying the owner of the cables. The C&C will participate in actively identifying its communications cables by color-coding the cables according to the guidelines established by the Joint Pole Committee. The C&C also proactively removes its old cables when new cables are installed during communications systems upgrades.

Another obstacle affecting the transfers of facilities from old joint poles to new joint poles is overgrown vegetation. The C&C periodically trims back foliage that interferes with the operations of its street lights and traffic signals to ensure the safety of the roadway users. The C&C also recognizes that excessive vegetation growth may impact the integrity of the poles that support its street lights and traffic signal cables and will enhance its proactive vegetation management program by trimming back vegetation a reasonable area/distance beyond its allocated space on the pole with the tools its crews have on hand.

The C&C's permitting process in other obstacle affecting the transfers of facilities from old joint poles to new joint poles, when underground conduits need to be relocated as well. The C&C will facilitate discussions with the C&C Department of Planning and Permitting to see if the Alden ONE software platform could be used to obtain clearances from stakeholders prior to the processing of the excavation permits, which are routed to multiple agencies.

Addressing double poles is a very involved and complex process. The C&C supports the efforts of the Hawaiian Electric Company to streamline the process and making it as efficient as possible.

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAI‘I

In the Matter of the Application of	)	
HAWAIIAN ELECTRIC COMPANY, INC. HAWAI‘I ELECTRIC LIGHT COMPANY, INC. MAUI ELECTRIC COMPANY, LIMITED Dba HAWAIIAN ELECTRIC	)	DOCKET NO.
For Approval of Stipulated Comprehensive Double Pole Removal Plan	)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application, Exhibits A through E, together with this Certificate of Service, was duly served on the following party, by electronic mail service as set forth below:

Division of Consumer Advocacy
Department of Commerce and Consumer Affairs
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DATED: Honolulu, Hawai‘i April 30, 2024

/s/ Richard VanDrunen

Richard VanDrunen
Hawaiian Electric Company, Inc.
Regulatory Affairs

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Case and Document Management System (CDMS).