

DIVISION OF CONSUMER ADVOCACY  
Department of Commerce and  
Consumer Affairs  
335 Merchant Street, Room 326  
Honolulu, Hawaii 96813  
Telephone: (808) 586-2800

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
 )  
HAWAIIAN ELECTRIC COMPANY, INC. )  
HAWAI'I ELECTRIC LIGHT COMPANY, INC.)  
MAUI ELECTRIC COMPANY, LIMITED )  
DbA HAWAIIAN ELECTRIC )  
 )  
For Approval of Stipulated Comprehensive )  
Double Pole Removal Plan. )

DOCKET NO. 2024-0121

**DIVISION OF CONSUMER ADVOCACY'S**  
**PRELIMINARY STATEMENT OF POSITION**

Pursuant to the Hawaii Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Hawaii Administrative Rules ("HAR") § 16-601-62, the Division of Consumer Advocacy ("Consumer Advocate") informs the Commission that it has conducted a preliminary review of the application in which Hawaiian Electric Company, Inc., Hawaii Electric Light Company, Inc., and Maui Electric Company, Limited (hereafter collectively referred to as the "Company") are requesting that the Commission:

1. Approve the Stipulated Comprehensive Double Pole Removal Plan ("Stipulated Double Pole Plan") which is attached as Exhibit B to the application; and

2. Grant the Company such other and further relief as may be just and equitable under the circumstances.<sup>1</sup>

At the outset, the Consumer Advocate commends the Company for organizing and hosting the four status update meetings and the numerous subcommittee meetings<sup>2</sup> and the Commission and participating stakeholders<sup>3</sup> for their active involvement and contributions in the meetings. The Consumer Advocate was invited to and participated in the status update meetings and subcommittee meetings and appreciates and recognizes the work conducted by the Company and all the stakeholders, which has resulted in the development of the Stipulated Double Pole Plan and other work products in the Application to address “the administration and removal of existing and new double poles in” Hawaii.<sup>4</sup> Through these discussions and as reflected in the Application and attached documentation, the Consumer Advocate notes that several work processes have been identified to prioritize and collaborate (e.g., shared database, shared resources, improvements to the permit processes and future review checkpoints among stakeholders, etc.) to improve efficiencies in the removal of double poles.

The Consumer Advocate notes that such efforts will continue and that stakeholders and other entities may be offering additional comments to the Application and attached

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<sup>1</sup> The Company’s application was filed on April 30, 2024, and hereafter will be referred to as the “Application.”

<sup>2</sup> See Application at 9.

<sup>3</sup> The Company identifies the participating stakeholders as: (1) the City and County of Honolulu, (2) the State of Hawaii, Department of Transportation, (3) Hawaiian Telcom, Inc., (4) Spectrum Oceanic, LLC, (5) Cellco Partnership dba Verizon Wireless, (6) AT&T Corp., and (7) New Cingular Wireless PCS, LLC. See Application at 5.

<sup>4</sup> Application at 3.

documentation. In doing so, the Consumer Advocate will continue in its review and will offer additional comments once a Commission approved procedural schedule has been filed or pursuant to deadlines agreed upon by the parties to this proceeding.<sup>5</sup>

The Consumer Advocate will participate in the above-captioned proceeding and will state its position upon completion of its investigation.

DATED: Honolulu, Hawaii, May 20, 2024

Respectfully submitted,

By /s/ Michael S. Angelo  
MICHAEL S. ANGELO  
Executive Director

DIVISION OF CONSUMER ADVOCACY

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<sup>5</sup> The filing of formal information requests may be affected by any motions for intervention or participation and when a Commission order granting intervenor or participant status has been filed.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **DIVISION OF CONSUMER ADVOCACY'S PRELIMINARY STATEMENT OF POSITION** was duly served upon the following parties electronically to the e-mail addresses below pursuant to HAR §16-601-21 (d), as modified by Order No. 38270 Setting Forth Public Utilities Commission Electronic Filing and Service Procedures, filed on March 14, 2022.

KEVIN M. KATSURA  
DIRECTOR, REGULATORY NON-RATE PROCEEDINGS  
Hawaiian Electric Company, Inc.  
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DATED: Honolulu, Hawaii, May 20, 2024.

/s/ S. Strack\_\_\_\_\_

**FILED**

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PUBLIC UTILITIES

COMMISSION

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