



July 26, 2024

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

Dear Commissioners:

Subject: Docket No. 2024-0121 – Double Pole Removal Plan  
Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and  
Maui Electric Company, Limited  
Hawaiian Electric Reply Statement of Position

Hawaiian Electric<sup>1</sup> respectfully submits this reply to the Consumer Advocate's statement of position ("SOP") filed on July 19, 2024, in the subject proceeding. In its SOP, the Consumer Advocate recommends that the Stipulated Comprehensive Double Pole Removal Plan (the "Stipulated Plan"), attached as Exhibit B to the Application filed by the Company on April 30, 2024, should be approved.

Hawaiian Electric appreciates the Consumer Advocate's support of the Application and Stipulated Plan, and supports the various proposals and recommendations described in Section II.B subsections 1 – 5 of the SOP.<sup>2</sup>

In particular, the Company is amenable to adopting the Consumer Advocate's recommendation that the Company provide bi-annual reporting in this docket on the progress of double pole removals, including the categories set forth on page 19 of the SOP.<sup>3</sup> The Company sees this reporting requirement as an opportunity to keep the Commission and the Consumer Advocate informed on double pole progress, and also as a means to provide transparency to the community.

The Company also appreciates the Consumer Advocate's concern regarding vegetation management set forth in Section II.(B)(7) of the SOP. The Company will continue its proactive

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<sup>1</sup> "Hawaiian Electric" or the "Company" refer collectively to Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

<sup>2</sup> The Company clarifies that the Stipulated Plan and Hawaiian Electric's double pole removal commitments only apply to Hawaiian Electric-owned poles. Hawaiian Electric's commitments for double poles do not relate to poles owned by Hawaiian Telcom or any government entities.

<sup>3</sup> Hawaiian Electric notes that its reporting will only include double poles that Hawaiian Electric is responsible for (standard transfers); Hawaiian Electric is not in a position to provide data on behalf of other parties that have double pole transfer or removal obligations. Any reporting on poles owned by third parties or on poles owned by Hawaiian Electric but whose double pole transfer is the responsibility of another party should be provided by the third party owning or controlling those poles or whose responsibility it is to remove.

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vegetation management on and around its lines and equipment and encourages all stakeholders to adopt similar proactive vegetation management on and around their equipment.

Based on the Consumer Advocate's supportive comments and recommendations, the Company believes that a formal Reply SOP is unnecessary and notifies the Commission that the proceeding is ready for decision making. The Company also recognizes the input and cooperation of the various stakeholders that have contributed to this successful process.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura  
Director  
Regulatory Non-Rate Proceedings

c: Division of Consumer Advocacy

**FILED**

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