



May 27, 2020

The Honorable Chair and Members  
of the Hawai'i Public Utilities Commission  
Kekuanao'a Building, First Floor  
465 South King Street  
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Docket No. 2018-0165  
Instituting a Proceeding to Investigate Integrated Grid Planning  
Hawaiian Electric Companies Update to IGP Schedule, Workplan, and  
Interdependencies with Other Dockets

In response to Order No. 36725 *Providing Guidance* issued in the subject proceeding on November 4, 2019, the Companies<sup>1</sup> respectfully submit an update on the Integrated Grid Planning (“IGP”) Workplan,<sup>2</sup> schedule, and its interdependencies with other Commission proceedings.

## **I. Introduction**

The Commission directed that “the Companies should present an updated timeline as a part of every Review Point filing[ and, in] developing their timelines, the Companies should consider how their work in IGP depends upon and interacts with other commission dockets . . . .”<sup>3</sup> The following discussion is based on Figure 1, which illustrates the Companies’ proposed revision to the first cycle IGP workplan and schedule.

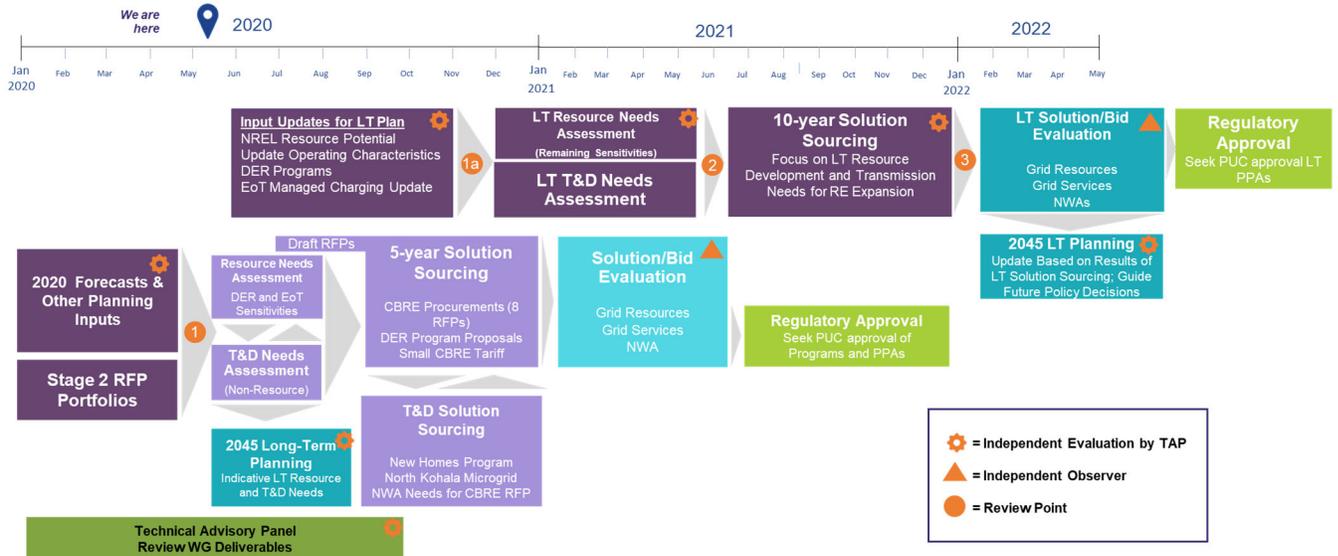
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<sup>1</sup> The “Companies” refers to Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai'i Electric Light Company, Inc.

<sup>2</sup> Filed in Docket No. 2018-0165 on December 14, 2018 and available at [https://www.hawaiianelectric.com/documents/clean\\_energy\\_hawaii/integrated\\_grid\\_planning/dkt\\_20180165\\_20181214\\_igp\\_workplan.pdf](https://www.hawaiianelectric.com/documents/clean_energy_hawaii/integrated_grid_planning/dkt_20180165_20181214_igp_workplan.pdf)

<sup>3</sup> See Order No. 36725 issued in Docket No. 2018-0165 on November 4, 2019 (“November IGP Commission Guidance”) at pp. 13-14.

Figure 1 Revised IGP Workplan and Schedule



The revised IGP timeline is driven by the following considerations:

- COVID-19 impacts to the Companies;
- The remaining working group activities in the Competitive Procurement Working Group (“CPWG”) and Solution Evaluation Optimization Working Group (“SEOWG”);
- The reformation of the Technical Advisory Panel (“TAP”); and
- Recent Commission directives in the CBRE proceeding (Docket No. 2015-0389) and the DER Policies proceeding (Docket No. 2019-0323).

## II. COVID-19 has Impacted the Companies, Including IGP Activities

In response to the COVID-19 pandemic, the Companies responded proactively, causing their operations to be adjusted since March 2020<sup>4</sup> subsequently impacting company and consultant resource availability.

As State and county directives<sup>5</sup> ordered a halt to non-essential business and activities, the Companies took steps toward ensuring that they could continue to operate in normal course. The Companies’ focus on providing essential services stalled the IGP team’s ability to proficiently

<sup>4</sup> See, e.g., the Companies’ Application For Approval to Defer Costs Associated with the COVID-19 Pandemic Emergency filed in Docket No. 2020-0069 on April 22, 2020 (“Application to Defer Costs Associated with COVID-19”) at pp. 6-9.

<sup>5</sup> See, e.g., <https://governor.hawaii.gov/newsroom/latest-news/proper-use-of-covid-19-tests-imperative-there-is-a-current-shortage-of-hand-sanitizers-and-toilet-paper-in-hawaii-in-part-because-of-the-publics-over-reaction-to-covid-19-the-hawaii/>

advance its work as efforts shifted to COVID-19 risk mitigation priorities. The Companies, as providers of essential services, used in-house resources to assess operational and business risks as well as activate their Incident Management Team.<sup>6</sup> Personnel working on the IGP team were called upon to analyze the operational and business risks associated with changes to customer activities. Key personnel working on IGP also staffed incident management activities during the months of March through May. IGP related activities were further limited as on-site consultant support was not available due to the mandatory 14-day quarantine ordered by the Governor for all individuals arriving or returning to the State of Hawai'i.<sup>7</sup> In non-operational areas, which includes personnel working on IGP, employees have been required to telework since March 16, 2020,<sup>8</sup> requiring employees to adjust to the new work environment and logistics. At the same time, the Stage 2 RFP detailed evaluation required significantly more analysis and key IGP personnel were called upon to assist in running production simulations in order to select a final award group by May 8, 2020.

As of this letter, incident management activities have transitioned to a monitoring phase, consultants and IGP personnel have generally adjusted to remote communication and teleworking, and IGP activities have started to regain the momentum present prior to the onset of the COVID-19 pandemic.

### III. The Companies have made Substantial Progress on the IGP Workplan

As illustrated in Figure 2, and described in this filing, substantial milestones to start the IGP needs assessment phase have been achieved; however, a few tasks are still in-progress.

*Figure 2 Status of Major Tasks Required to Start the Grid Needs Assessment*

Development Tasks	Expected Completion	Status	Comments
<span style="color: blue;">●</span> = Complete <span style="color: green;">●</span> = On-schedule <span style="color: yellow;">●</span> = Slightly behind schedule <span style="color: red;">●</span> = Delayed			
GSPA Standardized Contract		<span style="color: blue;">●</span>	
Soft Launch RFP		<span style="color: blue;">●</span>	Independent Observer Final Report to be filed with Review Point 1
Resilience WG Report	May 2020	<span style="color: green;">●</span>	To be filed with Review Point 1

<sup>6</sup> See Application to Defer Costs Associated with COVID-19 at 7.

<sup>7</sup> Office of the Governor, News Release, posted on March 21, 2020, available at <https://governor.hawaii.gov/newsroom/latest-news/governors-office-news-release-gov-ige-orders-mandatory-14-day-quarantine-for-all-individuals-arriving-or-returning-to-the-state-of-hawai%ca%bbi/>.

<sup>8</sup> See Application to Defer Costs Associated with COVID-19 at 7.

Development Tasks	Expected Completion	Status	Comments
2020 System Forecast and Input Assumptions	May 2020	●	To be filed with Review Point 1
Distribution Planning Methodology	May 2020	●	To be filed with Review Point 1
NWA Opportunity Evaluation Methodology	May 2020	●	To be filed with Review Point 1
Competitive Bid Framework Revisions	July 2020	●	Ongoing discussions with CPWG stakeholders
SEOWG Deliverable (Grid Service Definitions, Needs Assessment Methodology, and Solution Evaluation Methodology)	June 2020	●	Discussions ongoing with SEOWG stakeholders. Technical Advisory Panel has been participating in WG.
NREL Resource Potential Study Update	July/August 2020	●	Work has been delayed due to COVID-19 and contracting

The majority of the working group deliverables that will discuss the inputs, assumptions, and methodologies to be used in the IGP Grid Needs Assessment will be filed shortly in the instant docket at the first Review Point, where the Commission will have the opportunity to approve, or approve with modifications, the IGP 2020 System Forecasts and Input Assumptions. Other working group deliverables as described in Figure 2, above, will also be included in the first Review Point filing where the Commission may provide the Companies additional feedback prior to the Companies commencing the Grid Needs Assessment. The Forecast and Input Assumptions as well as the working group deliverables are a result of extensive stakeholder collaboration throughout 2019.<sup>9</sup>

The currently on-going work is related to the CPWG and SEOWG. The CPWG is on track to file a revised Competitive Bidding Framework with the Commission in July 2020. The Companies are currently working with the CPWG on incorporating stakeholder feedback. The Companies will soon publish another draft of the SEOWG deliverable incorporating stakeholder and Technical Advisory Panel (“TAP”) feedback. Producing another iteration of the SEOWG deliverable will allow stakeholders additional time for review, including the TAP, given its importance and complexity.

<sup>9</sup> See <https://www.hawaiianelectric.com/clean-energy-hawaii/integrated-grid-planning/stakeholder-engagement>.

The NREL Resource Potential Study Update builds upon work that was performed for the 2016 Power Supply Improvement Plan (“PSIP”) to update the onshore wind and grid-scale PV resource potentials as well as develop an estimate of distributed rooftop PV. This information is a key assumption for the planning analyses to understand the achievable types of variable renewable resource portfolios that can be developed to achieve higher levels of renewable integration on the system. This work is ongoing and expected to be completed by the end of July.

As described further below, the TAP is being reformed to have engaged members that collectively have expertise in a broad spectrum of technical topics and are able to take a leading role as the independent evaluator for IGP. The start of the long-term (“LT”) resource needs assessment step in December 2020 (see Figure 1) will allow the new TAP members (along with incumbent members) to review the various deliverables and provide formal feedback to the Companies, as shown by the dark green box at the bottom of Figure 1. It should be noted that throughout 2019 the working groups have presented material at TAP meetings, and the TAP members have attended working group meetings and provided written comments to the Companies, which has been incorporated into the deliverables. However, the Companies may accept further comments, especially from new TAP members, and address any comments prior to starting the LT resource needs assessment in December 2020. Based on the revised workplan schedule, the Companies will work with the TAP to incorporate any new comments by October 2020.

As discussed below, the CBRE and DER dockets will provide an opportunity for the TAP (as well as stakeholders) to gain additional insight into the novel proposed modeling techniques and methods to identify grid needs and their associated avoided cost. In working group discussions, stakeholders recognize the complexity of the model improvements being made. However, stakeholders asserted that the details of the mechanics of the capacity expansion modeling in RESOLVE are understood better through actual results and analysis. The CBRE procurements and the DER program track may serve to provide that opportunity by answering lingering stakeholder questions and to provide additional transparency to the TAP with respect to the modeling methods.

#### **IV. Recent Commission Directives Commencing CBRE Phase 2 and DER Policies Should be Aligned with IGP**

On April 9, 2020, the Commission issued Order No. 37070 in Docket No. 2015-0389 (“CBRE Order”), commencing Phase 2 of the CBRE Program. The CBRE Order expanded the program capacity to 235 MW and emphasized the need for smaller projects and greater customer access. Moreover, related specifically to IGP, the Companies will “use evaluation criteria to promote NWA to encourage and facilitate CBRE projects in locations that help defer or obviate

conventional investments in transmission and distribution infrastructure . . . [and] that can provide community resilience benefits . . . .”<sup>10</sup>

Also on April 9, 2020, the Commission issued Order No. 37066 in Docket No. 2019-0323 prioritizing the DER program track (“DER Program Track Order”), where the proceeding will focus on development of two programs for residential and commercial customers. The two programs will consist of a basic export-only program and an advanced program which will feature compensation for a combination of energy export and grid services.

As laid out in Figure 3, the Commission set forth an aggressive schedule for these two dockets. In total, the Commission directs the Companies to issue eight (8) different requests for proposals and DER program proposals over the next four (4) months.

*Figure 3 Procedural Schedule For CBRE Phase 2 and DER Program Track*

2020 Procedural Step	CBRE <sup>11</sup>	DER Program Track
June 30		Initial DER Program Proposals
July 1		Begin First Round of IRs
July 9	Draft Lana‘i RFP Draft Moloka‘i RFP Draft CBRE Tariff  Draft LMI RFP O‘ahu Draft LMI RFP Maui Draft LMI RFP Hawai‘i	
July 23		DER Technical Conference
July 29	CBRE Technical Conference	
August 5		End of First Round of IRs
August 12	CBRE Stakeholder Comments Due	
August 26		DER Program Proposal Updates
August 27		Begin Second Round of IRs

<sup>10</sup> CBRE Order at 26.

<sup>11</sup> This schedule reflects the Commission’s CBRE Order as amended by Order No. 37139 issued in Docket No. 2015-0389, Granting Hawaiian Electric Companies’ Motion for Partial Reconsideration of Order No. 37070.

<b>September 8</b>	Final Lana'i RFP Final Moloka'i RFP Final CBRE Tariff  Final LMI RFP O'ahu Final LMI RFP Maui Final LMI RFP Hawai'i	
<b>October 9</b>	Draft O'ahu RFP Draft Hawai'i RFP Draft Maui RFP	
<b>October 13</b>		DER Technical Conference
<b>October 21</b>		End Second Round of IRs
<b>October 28</b>	CBRE Technical Conference	
<b>November 5</b>		Final DER Program Proposals
<b>November 13</b>	CBRE Stakeholder Comments Due	
<b>December 1</b>	Final O'ahu RFP Final Maui RFP Final Hawai'i RFP	

The Companies agree that these initiatives should be prioritized and can help support Hawai'i's economic recovery from the COVID-19 pandemic. The introduction of new CBRE resources and DER programs may have a significant bearing on the near-term and long-term needs of the system. To ensure that the CBRE and DER programs are designed to deliver maximum value to customers, the Companies' resource plans should be updated using the IGP 2020 System Forecast and Input Assumptions to be filed with the first Review Point. The Companies also propose an evaluation of the grid services needs by applying the proposed grid needs assessment methodologies developed in the SEOWG. This will provide further opportunity to immediately test and vet these novel methods to identify and quantify grid services. This also allows the Companies to refine and adjust these novel methods prior to commencing the long-term resource needs assessment.

The CBRE RFPs should be informed by the outputs of the RESOLVE model analysis to identify the grid services needs within the CBRE Order program parameters. Supplementing the specific megawatt targets with complementary ancillary services would deliver better value to customers and allow developers to be better informed of system needs. Maui and Hawai'i Island are expected to achieve above 100 percent RPS with the selected Stage 1 and Stage 2 Renewable RFP projects so customers would increasingly benefit from a procurement designed to provide the right services at the right time.

Working within the constraints of the compressed procedural schedule, the Companies recommend that the draft RFPs to be submitted on July 9, 2020 include grid service definitions as proposed in the SEOWG so that stakeholders and prospective developers have an opportunity

to comment on the associated performance requirements. By the July 29, 2020 technical conference, the Companies will make best efforts to have initial RESOLVE outputs<sup>12</sup> available that quantify grid service needs based on the proposed (or approved) IGP forecasts and input assumptions from the first Review Point. Using this analysis to inform the LMI RFPs is critical because those procurements will be “uncapped.” Following the technical conference, the results of the RESOLVE analysis can then be inserted into the RFPs prior to issuance of the final RFPs on September 8, 2020.

The Companies also intend to provide similar information prior to issuing the draft RFPs due on October 9, 2020.

The DER Program Track Order directs the parties to submit DER program proposals by June 30, 2020. Once the Parties submit initial program proposals, the Companies may issue IRs during the first round to clarify aspects of the program proposals needed to properly evaluate the value of each proposal. The Parties’ program proposals may be further refined based on the tabulated grid needs assessment provided in the group of CBRE RFPs that are due on September 8, 2020. Subsequent to the first round of IRs, the Companies are open to having further discussion with the Commission and the Parties regarding how the DER Program Track can remain aligned with the IGP inputs, assumptions, and modeling while achieving the Commission’s intent to have Parties submit DER proposals that include a “quantitative estimate of the value of the program.”<sup>13</sup>

Based on the discussion above, and as the November IGP Commission Guidance stated, “[t]he commission stands ready to assist this effort, so the Companies can maximize potential synergies and avoid contradictions or unnecessary duplication. The Companies may describe these docket interactions as a part of Review Point filings . . . .”<sup>14</sup> The Companies, through Figure 4, describe the major workplan steps to integrate the Electrification of Transportation (“EoT”) Roadmap and CBRE Phase 2 with IGP. As noted above, the Companies are open to further discussions on how best to integrate the DER Program Track’s expedited timeline with IGP.

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<sup>12</sup> Significant updates are being made to the RESOLVE model to accommodate the grid services that have been proposed in the SEOWG. Producing results in this short timeframe will depend on the RESOLVE model to run without computational issues or “bugs” after these updates are made. If the model runs as expected, the results can inform proposers as to the quantities of various grid services on a temporal basis.

<sup>13</sup> DER Program Track Order at 11.

<sup>14</sup> November IGP Commission Guidance at 15.

*Figure 4 Proposed workplan steps to align EoT, CBRE, and DER Program Track dockets with IGP*

	<b>EoT Roadmap Update</b>	<b>CBRE</b>
<b>Current</b>	Update new RESOLVE model with IGP assumptions for O'ahu, Maui, Hawai'i Island	
<b>July 1</b>	Unmanaged and managed charging updates for O'ahu, Maui, and Hawai'i Island	Update new RESOLVE model with IGP assumptions for Moloka'i and Lana'i
<b>July 9</b>		Add placeholders to draft RFPs for grid services to be requested.  In-progress – Use managed charging RESOLVE portfolio from EoT Roadmap Update to run resource needs assessment
<b>July 29</b>		CBRE Technical Conference – present resource needs assessment
<b>September 8</b>		Final RFP updated with grid services needs

**V. The Companies Believe the Revised Workplan will Benefit the Overall IGP Process**

Within the context of IGP, the CBRE and DER directives issued by the Commission lay a clear path for near-term actions, which should be informed by updated analysis given significant changes in procured resources since the 2016 PSIP. The Companies view this as an opportunity to validate novel grid planning methods being proposed in the IGP SEOWG process (i.e., resource grid needs assessment, NWA's, etc.) as these are significant advancements to the RESOLVE model over the 2016 PSIP version.

The Companies propose that by December 2020, long-term resource plans be updated with a focus on a 10-year action plan that will allow for the procurement of resources with a commercial operations date (“COD”) beyond 2025. This allows the Companies to be responsive to stakeholder feedback that projects with longer development time should be allowed to compete in the competitive procurement process. This includes recognition that even for shorter lead time projects such as solar + storage, transmission capacity following the recent Stage 2 procurement is extremely limited in renewable development areas. This will allow the grid needs assessment to compare building new transmission facilities to harness renewable energy zones against DER alternatives, or other types of resources.

## **VI. Other Aspects of the Revised Workplan to be Addressed**

Referencing Figure 1, in addition to the CBRE Phase 2 Order and DER Program Track Order, the near-term action plan includes:

- An evaluation of a New Homes Program related to the Soft Launch RFP;
- North Kohala Microgrid opportunity;
- An identification of T&D capital deferral opportunities where projects located in certain areas may receive credit in the CBRE evaluation;
- An update of EoT analysis of managed and unmanaged charging to inform EV rate designs pursuant to the Companies' Electrification of Transportation Workplan filed on October 29, 2019 in Docket No. 2018-0135, *EoT Strategic Roadmap*;
- Prior to commencing the start of the LT Resource Needs Assessment, the Companies intend to update the model inputs with the NREL resource potential update, any information on CBRE Phase 2, DER Programs, and results of the EoT rate design analysis. The Companies intend to file an updated Review Point 1a with the Commission reflecting any updates prior to commencing the LT grid needs assessment.

## **VII. The TAP will Fill the Role of Independent Evaluator of the IGP Technical Work**

The December 14, 2018 Integrated Grid Planning Workplan stated that:

Technical Advisory Panel members will provide relevant knowledge and experience to discuss technical planning related issues and provide guidance on engineering issues and emerging best practices. The expectation is for members to make contributions towards achieving the meeting goals by sharing ideas, asking questions, and contributing to discussions. The Technical Advisory Panel is an independent advisory group and is not a decision-making body. The TAP will also not produce any engineering and economic analyses or evaluation of sourcing/procurements but may provide feedback on the methods and processes that the Companies use to perform such work.

Through its November IGP Commission Guidance, the Commission noted that, “[f]or the stakeholder process outlined in the Workplan to effectively serve as a replacement for independent evaluation, the Technical Advisory Panel would have to take an active role in analyzing, evaluating, and providing public feedback on Working Group activities and Review Point filings.”<sup>15</sup> The Commission continued by stating its expectation that the Companies “use the Technical Advisory Panel to provide independent review of each Review Point filing that the Companies will file. If the Technical Advisory Panel is unable or unwilling to do so, or if the

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<sup>15</sup> See November IGP Commission Guidance at 11.

commission finds such review insufficient, the commission may require independent evaluation at that time.”<sup>16</sup> In response to this guidance, the Companies have asked the Hawaii Natural Energy Institute (“HNEI”) to assist them in developing a more productive approach to the use of the TAP. The Companies, along with HNEI, propose the following.

### **Observations on the TAP**

The proposal intends to address limitations and improve the efficacy of the TAP to assist the Companies in meeting their goals.

- a. **TAP Member Engagement:** A number of the participants are either only intermittently involved or may not have the ideal expertise to address the Companies’ issues, such as large-scale distributed energy penetration on an island grid.
- b. **Working Group Review:** Current working group presentations at the TAP meetings, while useful, have not led to substantive TAP guidance and review. Furthermore, waiting for formal review point filings will not lead to optimal TAP input.
- c. **TAP Meeting Preparation:** The current TAP presentations seem to be structured to have the TAP more in a listening mode rather than as an advisor – that is, there seems to be insufficient time for a dynamic interchange of questions and ideas.
- d. **Stakeholder Council-TAP Engagement:** Despite the guidance of the Commission to better engage the Stakeholder Council, there has been limited substantive interaction between the Stakeholder Council and the TAP.

### **Proposed Changes for Improving TAP Effectiveness**

**TAP Member Engagement:** Reform TAP membership with new members that will be more involved and relevant to the Companies’ challenges and needs. Clearly state expectations ahead of time, including calendar of meetings (in-person), expected feedback, funding requirements, and expected hours per month.

- a. Set up coordination schedule between the Companies, HNEI, and TAP members. This should be done on a regular basis with dates set far enough in advance for the TAP members to plan accordingly. An initial proposal would have meetings on a bi-monthly basis. Every third meeting would be in-person and other meetings would be via webinar.
- b. Since the next meeting should be with the new TAP, it should be an in-person meeting; however, due to ongoing COVID-19 restrictions this meeting may need to take place virtually.

**Working Group Review:** The TAP will review working group output as it is developed with the intention of identifying critical issues requiring more in-depth analysis, and provide suggestions for coordination among working groups. Process improvements to include:

- a. Assigning TAP members to review outputs of specific working groups.
- b. The TAP will develop a list of questions that will need to be addressed in the next TAP meeting.

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<sup>16</sup> Id. at 11-12.

- c. The TAP will also provide an overall, independent assessment of all final Working Group deliverables, including but not limited to, the process, reasonableness of proposed methods, etc. The intent is to “close the loop” prior to the Companies commencing analytics steps, so that the Commission has a view of the TAP’s observations.
- d. The TAP will present results of assessments to the Stakeholder Council.

**Review Point filings:** The TAP will review, evaluate, and provide feedback on review point filings and provide their independent perspective for the Commission and stakeholders. Review Points are intended to be the outputs of the analytical steps.

**TAP Meeting Preparation and Follow-up:** Use TAP working group reviews to identify agenda topics for TAP meetings (in addition to the Companies’ items). The TAP to recommend follow-up subsequent to meeting.

- a. Suggested agenda items will be forwarded to the Companies three weeks prior to the TAP meeting to allow time for company responses and input.
- b. The ensuing TAP meeting should focus on addressing a select number of these questions, rather than simply going over internal working group reports.
- c. Following the conclusion of the TAP meeting, a summary should be developed discussing the issues raised and resolved during the meeting, and recommended follow-on actions.

**Stakeholder Council-TAP Engagement:** Once the TAP is able to establish a cadence of meetings, TAP meeting summary results and recommendations will be presented at the subsequent Stakeholder Council meeting by HNEL.

## **VIII. Conclusion**

The November IGP Commission Guidance acknowledged that:

Because the IGP process is an ambitious and novel effort, with many interdependent parts, it is understandable and reasonable that the first iteration is taking longer than planned. Although the Companies should strive to meet their timelines, the Companies should also allow themselves enough time to complete necessary steps.<sup>17</sup>

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<sup>17</sup> Id. at 13.

The Honorable Chair and Members  
of the Hawai'i Public Utilities Commission  
May 27, 2020  
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The Companies appreciate the opportunity to update the Commission on the revised workplan and schedule in response to the November IGP Commission Guidance and look forward to continued progress incorporating the process improvements set forth above.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura  
Director  
Regulatory Non-Rate Proceedings

c: Service List

SERVICE LIST  
(Docket No. 2018-0165)

DEAN NISHINA  
EXECUTIVE DIRECTOR  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
DIVISION OF CONSUMER ADVOCACY  
P.O. Box 541  
Honolulu, HI 96809  
[Dean.K.Nishina@dcca.hawaii.gov](mailto:Dean.K.Nishina@dcca.hawaii.gov)

1 Copy  
Electronic Transmission

JOSEPH K. KAMELAMELA  
CORPORATION COUNSEL  
ANGELIC M.H. HALL  
DEPUTY CORPORATION COUNSEL  
COUNTY OF HAWAI'I  
101 Aupuni Street, Suite 325  
Hilo, Hawaii 96720  
Attorneys for COUNTY OF HAWAI'I  
[AngelicMalia.Hall@hawaiicounty.gov](mailto:AngelicMalia.Hall@hawaiicounty.gov)

1 Copy  
Electronic Transmission

ISAAC H. MORIWAKE  
KYLIE W. WAGER CRUZ  
Earthjustice  
850 Richards Street, Suite 400  
Honolulu, HI 96813  
Attorneys for BLUE PLANET FOUNDATION  
[imoriwake@earthjustice.org](mailto:imoriwake@earthjustice.org)  
[kwager@earthjustice.org](mailto:kwager@earthjustice.org)

1 Copy  
Electronic Transmission

WILLIAM J. ROLSTON  
DIRECTOR – ENERGY ISLAND  
73-4101 Lapa‘au Place  
Kailua Kona, Hawaii 96740-8424  
[willenergyisland@gmail.com](mailto:willenergyisland@gmail.com)

1 Copy  
Electronic Transmission

BEREN ARGETSINGER  
Keyes & Fox LLP  
P.O. Box 166  
Burdett, NY 14818  
Counsel for HAWAI'I PV COALITION  
[bargetsinger@keyesfox.com](mailto:bargetsinger@keyesfox.com)

1 Copy  
Electronic Transmission

TIM LINDL  
Keyes & Fox LLP  
580 California Street, 12th Floor  
San Francisco, CA 94104  
Counsel for HAWAI'I PV COALITION  
[tlindl@keyesfox.com](mailto:tlindl@keyesfox.com)

1 Copy  
Electronic Transmission

SERVICE LIST  
(Docket No. 2018-0165)

WILLIAM G. GIESE  
Executive Director  
HAWAII SOLAR ENERGY ASSOCIATION  
c/o Hawaii Solar Energy Association  
PO Box 37070  
Honolulu, HI 96817  
[wgiese@hsea.org](mailto:wgiese@hsea.org)

1 Copy  
Electronic Transmission

HENRY Q CURTIS  
VICE PRESIDENT FOR CONSUMER AFFAIRS  
LIFE OF THE LAND  
P.O. Box 37158  
Honolulu, Hawaii 96837  
[henry.lifeoftheland@gmail.com](mailto:henry.lifeoftheland@gmail.com)

1 Copy  
Electronic Transmission

DOUGLAS A. CODIGA  
MARK F. ITO  
Schlack Ito  
A Limited Liability Law Company  
Topa Financial Center  
745 Fort Street, Suite 1500  
Honolulu, Hawaii 96813  
Attorneys for PROGRESSION HAWAII OFFSHORE WIND, LLC  
[dcodiga@schlackito.com](mailto:dcodiga@schlackito.com)

1 Copy  
Electronic Transmission

ERIK KVAM  
PRESIDENT  
RENEWABLE ENERGY ACTION COALITION  
OF HAWAII, INC.  
4188-4 Keanu Street  
Honolulu, Hawaii 96816  
[Erik.Kvam@REACHawaii.org](mailto:Erik.Kvam@REACHawaii.org)

1 Copy  
Electronic Transmission

GERALD A. SUMIDA  
ARSIMA A. MULLER  
Carlsmith Ball LLP  
ASB Tower, Suite 2100  
1001 Bishop Street  
Honolulu, HI 96813  
Attorneys for ULUPONO INITIATIVE LLC  
[gsumida@carlsmith.com](mailto:gsumida@carlsmith.com)  
[amuller@carlsmith.com](mailto:amuller@carlsmith.com)

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Electronic Transmission

## Chun, Marisa

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