

CBRE Order 37592 Stakeholder Working Group

Pre-Read Reference
Docket No. 2015-0389
February 22, 2021

Ground Rules

- ◆ Chatham House Rule will apply – no personal or organizational attribution will be made to any comments/feedback provided during the meeting by any participant nor in written documentation.
- ◆ Working group meetings, and other information exchanges are intended solely to provide an open forum or means for the expression of various points of view in compliance with antitrust laws.
- ◆ Under no circumstances shall engagement activities be used as a means for competing companies to reach any understanding, expressed or implied, which tends to restrict competition, or in any way, to impair the ability of participating organizations to exercise independent business judgment regarding matters affecting competition or regulatory positions.
- ◆ Proprietary information shall not be disclosed by any participant during any industry engagement meeting or information exchange. In addition, no information of a secret or proprietary nature shall be made available to industry engagement participants.
- ◆ All proprietary information which may nonetheless be publicly disclosed by any participant during any industry engagement meeting or information exchange shall be deemed to have been disclosed on a non-confidential basis, without any restrictions on use by anyone, except that no valid copyright or patent right shall be deemed to have been waived by such disclosure.



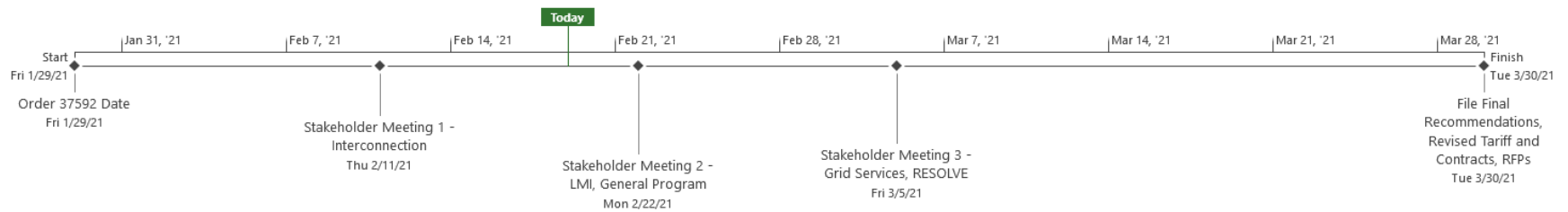
Order 37592

◆ PUC

- Parties, Participants and Independent Observer
 - How to make Hawaiian Electric's CBRE interconnection process more
 - Transparent
 - Predictable
 - Including costs, timelines and engineering decisions involved.
 - Best practices used in other jurisdictions



60-day Filing Schedule



Overview of LMI Verification and Enrollment Topics



LMI Verification & Enrollment

Problem:

- LMI process is not clear and simple.
LMI verification is burdensome.

Solution:

- Eliminate unnecessary verification
- Do not require SOs to verify income
- Make it easy for LMI participation
- Reduce risks and high transaction costs for SOs

Deliverables:

- Geographic Eligibility
- Expand list of comparable programs

Risks:

- Potential gaming of the system



Overview of General Participation Requirements



General Program Requirements

Problem:

- Filings are over 16,000 pages
- Requirements are restrictive

Solution:

- Simplify filings
- Develop a roadmap to find key elements in filing
- Reconsider six-month enrollment requirement
- Reconsider terms on transfer of interest

Deliverables:

- More simplified filing
- Remove six-month enrollment requirement
- Consider remove transfer restrictions

Risks:

- Filings were length partly to be more transparent
- Potential portal change requests (cost/time)
- People could oversize subscriptions
- Securities concerns with transfer of pay-as-you go
- More transfer administrative effort on SOs 8



Summary of Docket Comments

Docket 2015-0389

October 26, 2020 and November 13, 2020

Comments Submitted to Docket 2015-0389

LMI Anchor Tenants

Party	Comment
CA	Require the Hawaiian Electric Companies to report the size and percentage of the CBRE project capacity of each non-LMI Anchor Tenant; the approximate number of LMI customers the non-LMI Anchor Tenant serves; and how each anchor tenant passes savings and/or benefits to LMI individuals, families and/or communities. if the LMI Anchor Tenant's primary mission changes such that it no longer primarily serves or benefits LMI persons or households, the LMI Anchor Tenant must notify the Subscriber Organization and Hawaiian Electric within 30 days.
Ulupono	The concerns regarding limitations on parties that can serve as "anchor tenants" in CBRE projects
Joint Parties	Removing these amorphous restrictions on anchor tenants would not only create more opportunities for LMI projects to succeed but would also avoid administrative burden and confusion regarding eligibility and enforcement.



Comments Submitted to Docket 2015-0389

LMI 6-Month Residency Requirement

Party	Comment
Joint Parties	The CBRE program should allow for waiting lists for potential LMI subscribers, and not subject them to six-month residency requirements or credit check verifications.
NexAmp	This is a problem for two reasons: first, it would make acquiring customers more costly - the smaller the pool of possible subscribers, the more money it costs to find and acquire them. Second, it would limit the size of a waitlist a Subscriber Organization could generate to backfill open capacity once existing subscribers leave. In other words, having as flexible and open a market as possible actually reduces the risk of customer chum. There is no reason why a subscriber should not be able to be enrolled in a project before it is live simply because she has not had electrical service for six months.



Comments Submitted to Docket 2015-0389

LMI Income Verification

Party	Comment
CA	Require the Companies to work with LIHEAP, SNAP, and Housing Choice Voucher program partners and SOs to periodically verify that existing subscribers still qualify under one of more of these programs. Review program, participating rosters, and re-verification process after a designated period
NexAmp	The Companies are only allowing participation in three assistance programs to serve as a proxy for income verification through review of tax documents.
NexAmp	Companies should consider allowing income verification by address, using census-designations
NexAmp	A universal rule requiring customers to enroll online could be a barrier to their participation.

Comments Submitted to Docket 2015-0389

LMI - Additional Comments

Party	Comment
CA	Explore whether outreach for CBRE LMI projects should be coordinated with governmental agencies and NGOs who already interface with targeted demographic groups.
Joint Parties	Lower LMI participation barriers including: removing limits on types of entities that may serve as anchor tenants; allow waiting lists; remove six-month residency requirements or credit check verifications.



Comments Submitted to Docket 2015-0389

General Participation Comments

Party	Comment
CA	Companies have committed to complete CA suggested portal enhancements by 1Q 2021. The Consumer Advocate believes that it will be important to have portal enhancements completed ahead of the period during which multiple CBRE projects are expected to be online to assist potential subscribers in making investment decisions.
Joint Parties	The Companies should be prepared for and willing to accept bids that allow subscribers, Subscriber Organizations, and developers to be fairly compensated for the energy they produce. The Commission could, alternatively, set a minimum discount rate at which subscribers would be compensated, e.g., at least 20%-30%.



Comments Submitted to Docket 2015-0389

General Participation Comments

Party	Comment
Joint Parties	The Commission should require the Companies to pare down, simplify, and streamline all documents to the bare minimum contents, and consider removing provisions that penalize or increase burden on developers.
Uluono Initiative	The need for more simplified, clear and less voluminous tariffs and RFP documents, including the Mid-Tier CBRE SFC contract forms and the Large CBRE Model RDG PP A contract forms



Comments Submitted to Docket 2015-0389

Transfer Subscriptions - Comments

Party	Comment
Ulupono Initiative	The requirement that a Pay-As-You-Go transfer must be 100% of the subscription rather than 50% as prescribed by the Commission
Joint Parties	...this new requirement violates the Commission's previous orders that allow for 50% or greater interest transfers (subject to a minimum subscription size of 1 kW) and unnecessarily hinders program flexibility.



Comments Submitted to Docket 2015-0389

Backup Queue - Comments

Party	Comment
Joint Parties	<p>Maintaining a reserve queue until the next tranche or phase of the CBRE program commences will increase the likelihood that available program capacity will be utilized and more projects will go online, and could also help to avoid lengthy freezes in CBRE project development between tranches and phases. Phase 1 of the CBRE program ended more than 15 months ago, and more months will likely pass before Phase 2 commences. In the unfortunate event that a similar pause occurs before Tranche 2 or the next phase of the CBRE program, projects in the reserve queue should be allowed to move forward in the interim using available program capacity that the Commission will have already approved.</p>

