



November 22, 2021

The Honorable Chair and Members of  
the Hawai'i Public Utilities Commission  
Kekuanao'a Building, First Floor  
465 South King Street, #103  
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Docket No. 2019-0323  
Instituting a Proceeding to Investigate Distributed Energy Resource Policies  
Pertaining To The Hawaiian Electric Companies  
Hawaiian Electric's Notification Regarding Smart Export and Customer Grid  
Supply Plus Program Capacities

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Pursuant to Ordering Paragraphs No. 37 and 49 in Decision and Order No. 34924, issued October 20, 2017, in Docket No. 2014-0192 ("D&O 34924"),<sup>1</sup> Hawaiian Electric<sup>2</sup> respectfully informs the Commission that the 75% notification threshold for the Customer Grid Supply Plus ("CGS+") program, based on conditionally approved applications, has been reached for Maui County and Hawai'i Island. In addition, the 75% notification threshold has been reached on Maui County for the Smart Export program.

In D&O 34924, the Commission defined Smart Export and CGS+ program capacity limits for the Company. Ordering Paragraph Nos. 35 and 48 provide that the Smart Export and CGS+ program capacity limits "shall be based on a kW measure of systems actually installed."<sup>3</sup> With respect to the Smart Export program, the Commission also directed the Company to "process and approve applications until the capacity associated with approved applications reaches the program cap. Thereafter, the Company shall continue to accept applications, but shall issue a notice to the applicant informing him or her that the application has been accepted,

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<sup>1</sup> In recognizing the increasing overlap between the issues and policies implicated by its Distributed Energy Resources ("DER") and Demand Response ("DR") investigations, the Commission closed the DER docket (Docket No. 2014-0192) in Order No. 36476 issued August 19, 2019, and closed the DR docket (Docket No. 2015-0412) in Order No. 36499 issued September 3, 2019, and opened the current docket to investigate these issues and policies comprehensively. See Docket No. 2019-0323, Order No. 36538, issued September 24, 2019.

<sup>2</sup> Hawaiian Electric Company, Inc., Maui Electric Company, Limited, and Hawai'i Electric Light Company, Inc. (collectively referred to herein as "Hawaiian Electric" or "Company") 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.

<sup>3</sup> D&O 34924 at 178, 182.

but approval is conditioned on available capacity space.”<sup>4</sup> The Commission ordered the same with respect to the CGS+ program administration.<sup>5</sup>

In Ordering Paragraph No. 37, the Commission directed the Company to “publicly announce and notify the commission and Parties when 50%, 75%, and 90% of their respective interim Smart Export program caps have been reached.”<sup>6</sup> The Commission required the same announcement and notification procedure with respect to the CGS+ program administration in Ordering Paragraph No. 49.<sup>7</sup>

As discussed in its prior notice to the Commission on this subject, filed on January 29, 2021, the Company is tracking the capacity associated with approved applications, which are defined as those that receive conditional approval to proceed with construction.<sup>8</sup> The Company is also tracking the installed capacity as defined by fully executed agreements. The Company has been reporting this information to the Commission and Parties in the DER Weekly Queue Report since the programs began in 2018.

The Company will continue to report the status of the program caps in the Weekly Queue Report. To provide as much advance notice as possible, the Company is using conditional approvals as the trigger to publicly notify the Commission and Parties when 50%, 75% and 90% of program caps have been reached. The Company will provide notice by the following methods:

- Filing a letter in this proceeding to the Commission and Parties;
- Communication to all active installers and contractors;
- Posting the information on Hawaiian Electric’s websites; and
- As applicable, discussing the status of program caps during any regularly scheduled DER stakeholder meeting.

With regards to the CGS+ program, the Company is providing notice that Maui County and Hawai'i Island have reached the 75% threshold for conditionally approved applications. As shown in the table below, as of the week of November 19, 2021, Hawai'i Island is at 82%, Maui County is at 80%, and O'ahu is at 91% of their respective CGS+ program caps. By Order No. 37714, issued on April 7, 2021, the Commission increased the program capacity for CGS+ for O'ahu from 35

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<sup>4</sup> Id. at 178-179.

<sup>5</sup> Id. at 182.

<sup>6</sup> Id. at 179.

<sup>7</sup> See id. at 182-83.

<sup>8</sup> Hawaiian Electric’s January 29, 2021 filing provided notice that the 90% notification threshold for CGS+ applications had been reached on O’ahu. Prior to that, Hawaiian Electric’s November 20, 2020 filing provided notice that the 75% notification threshold for CGS+ applications had been reached on O’ahu. In addition, the Company provided notice that the 50% notification threshold had been reached on O’ahu and Maui County for the Smart Export program.

MW to 50 MW. By Order No. 37066, issued on April 9, 2020, the Commission increased the program capacity for CGS+ for Hawai'i Island from 7 MW to 12 MW.

With regards to the Smart Export program, the Company is providing notice that Maui County has reached the 75% threshold for conditionally approved applications. As shown in the table below, as of the week of November 19, 2021, Maui County is at 83%, Hawai'i Island is at 70%, and O'ahu is at 60% of its respective Smart Export cap for conditionally approved applications.

Territory	Program	Submitted (RC/ITR/SR)	Approved (PI/PV+PE)	Executed (EX)	Program Capacity	Remaining
Hawai'i Island	CGS Plus	0.13 MW	2.34 MW	7.45 MW	12.00 MW (82%)	2.08 MW
	Smart Export	0.03 MW	1.12 MW	5.91 MW	10.00 MW (70%)	2.94 MW
Maui County	CGS Plus	0.49 MW	2.17 MW	3.43 MW	7.00 MW (80%)	0.91 MW
	Smart Export	0.08 MW	1.65 MW	2.48 MW	5.00 MW (83%)	0.79 MW
Oahu	CGS Plus	1.77 MW	15.46 MW	30.23 MW	50.00 MW (91%)	2.54 MW
	Smart Export	0.26 MW	4.07 MW	10.82 MW	25.00 MW (60%)	9.85 MW

Pursuant to D&O 34924, Hawaiian Electric confirms that, for both the Smart Export and CGS+ programs, even after the program caps are met, applications will still be accepted, and customers in queue will be admitted to the program as space becomes available to the extent applications are cancelled.

Sincerely,

/s/ Kaiulani Shinsato

Kaiulani Shinsato  
Director  
Customer Energy Resources Programs