

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
SUBMISSION OF INFORMATION REQUESTS

Pursuant to the Hawaii Public Utilities Commission's Order No.40794 Establishing
A Statement of Issues and Setting Forth a Procedural Schedule, filed on May 23, 2024,
the Division of Consumer Advocacy hereby submits its **SUBMISSION OF**
INFORMATION REQUESTS in the above docketed matter.

DATED: Honolulu, Hawaii, May 31, 2024.

Respectfully submitted,

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

DIVISION OF CONSUMER ADVOCACY

DOCKET NO. 2024-0121

HAWAIIAN ELECTRIC COMPANY, INC.
HAWAI'I ELECTRIC LIGHT COMPANY, INC.
MAUI ELECTRIC COMPANY, LIMITED
dba HAWAIIAN ELECTRIC

SUBMISSION OF INFORMATION REQUESTS

INSTRUCTIONS

In order to expedite and facilitate the Consumer Advocate's review and analysis in the above matter, the following is requested:

1. For each response, the Respondent should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, the Respondent should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by the Respondent to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, Respondent instructions, or any other relevant authoritative source which the Respondent used.

4. Should the Respondent claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions the Respondent is willing to permit disclosure to the Consumer Advocate (e.g., protective agreement, review at business offices, etc.); and
 - d. If the Respondent claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that the Respondent claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

DOCKET NO. 2024-0121

**HAWAIIAN ELECTRIC COMPANY, INC.,
HAWAI'I ELECTRIC LIGHT COMPANY, INC. AND
MAUI ELECTRIC COMPANY, LIMITED
dba HAWAIIAN ELECTRIC**

SUBMISSION OF INFORMATION REQUESTS

CA-IR-1

Ref: Application, Verification, Exhibits A – K, and Certificate of Service, filed on April 30, 2024 (“Application”), at 10.

On page 10 of the Application, Hawaiian Electric Company, Inc. (“HECO”), Hawaii Electric Light Company, Inc. (“HELCO”), and Maui Electric Company, Limited (“MECO”) (collectively referred to as the “Company” or “Hawaiian Electric”)¹, states that Alden ONE, is “an online portal and database software tool to be shared among the Parties in order to facilitate efficient communication and tracking related to all steps of double pole creation and removals.”

- a. When did the Company start utilizing Alden ONE?
- b. Provide all applicable features of Alden ONE. Specifically, among other things: (1) what are the various security features of Alden ONE; (2) is information on the system fully

¹ The Company identifies the participating stakeholders as: (1) the City and County of Honolulu (“C&C”), (2) the State of Hawaii, Department of Transportation (“DOT”), (3) Hawaiian Telcom, Inc. (“HT”), (4) Spectrum Oceanic, LLC (“Charter”) (5) Cellco Partnership dba Verizon Wireless, (6) AT&T Corp., and (7) New Cingular Wireless PCS, LLC (collectively, hereafter referred to as “Stakeholders”). See Application, at 5. In turn, the Stakeholders and the Company are collectively referred to as the “Parties”. See Application, at 2, footnote 3.

searchable and sortable; and (3) is locational information regarding double poles easily identifiable?

- c. What is the upfront and annual subscription costs for Alden ONE?

CA-IR-2

Ref: Application, Exhibit A, at 25-26.

In a filing submitted on November 30, 2023, in response to the Public Utilities Commission's ("Commission") question regarding current Company-maintained databases used to track double poles (i.e., Question-02), the Company states that it uses "operating company-specific Joint Pole ("JP") databases where pole data information and responses are recorded." The Company specified that: (1) Oahu's JP web-based database is called Joint Pole Management ("JPM"); (2) Hawaii Island's JP database is call JP Track ("JPT"), which is a Access database, and (3) Maui's JP database is an Excel database called Notice of Intent ("NOI").

- a. Are HECO, HELCO and MECO all exclusively using Alden ONE currently? If not, why not?
- b. To the extent that JPM, JPT and NOI are still being used by HECO, HELCO, and MECO, respectively, when does the Company expect that Alden ONE will be exclusively utilized throughout the Company, statewide?

Ref: Application, Exhibit B, at 4.

While maintaining that “*Automated Notice of Intent (“NOI”) Will Create Efficiencies*”, the Company states the following:

Hawaiian Electric issues NOIs to C&C, DOT, HT and Charter when a new pole is scheduled to replace an old pole and an Erection Notice (“EN”) when a pole is erected at a new location. The NOI includes specific details about the exact location of the new pole and is used to help applicable Stakeholders decide if they want to take an ownership interest in or attach to the new pole. NOIs prove particularly beneficial to HT and Charter as these early notifications allow their engineering teams to provide valuable information to Hawaiian Electric regarding the correct pole sizing and optimal positioning of the new pole. This guidance can help facilitate quicker removal of the old pole.

...

In general, Hawaiian Electric tries to send NOIs by email to applicable Stakeholders involving pole replacements approximately 30-45 days in advance.

- a. Please confirm that if the Stipulated Comprehensive Double Pole Removal Plan (“Stipulated Double Pole Plan”) is approved by the Commission, Alden ONE will be utilized by the Company to issue both NOIs and ENs.
- b. Given the importance of NOIs, as noted above, would the Company commit to issuing NOIs sooner than 30-45 days in advance?
- c. Is a commitment to issue NOIs 60 days in advance possible? If not, why not? Please provide any challenges to establishing

and meeting a 60 days' advance notice protocol regarding the issuance of NOIs.

CA-IR-4

Ref: Application, Exhibit B, at 6.

Here, the Company states that it has established standing monthly meetings with HT and Charter to discuss progress and raise any issues related to double poles.

- a. Would the Company be opposed to periodic meetings of all Stakeholders to discuss double pole issues and address implementation of the Stipulated Double Pole Plan, similar to the Status and Subcommittee Meetings held prior to the filing of the Application?
- b. If not opposed to periodic meetings, in the Company's view, how often should such meetings with Stakeholders be held?

CA-IR-5

Ref: Application, at 10-11; and Application, Exhibit B, at 6-10.

On pages 10-11 of the Application, the Company refers to the concept of "One Touch" and states that:

. . . where possible, using a "One Touch" concept whereby qualified contractors and certain union crews will be able to transfer several Stakeholders' equipment from the old pole to the new pole. This can minimize the number of different contractors that need to schedule and perform transfer work on a specific pole and limit how many times contractors or union crews go to that pole, thereby accelerating the pace of transfers and removals.

In addition, the “One Touch” concept is mentioned in various sections of the Stipulated Double Pole Plan (i.e., Application, Exhibit B, at 6-10) under the heading “Efficiencies Gained by Shared Resources” and in support of **Stipulation 5** and **Stipulation 6**.

- a. Rather than implementing “One Touch” *concepts*, should a “One Touch” program for the administration and removal of existing and new double poles in Hawaii be established and implemented?
- b. Please identify the various steps necessary in establishing and implementing a “One Touch” program (as opposed to a implementing concepts) with respect to the administration and removal of existing and new double poles in Hawaii.
- c. What are the challenges of establishing and implementing a “One Touch” program regarding double poles and what is needed to overcome them?
- d. Is the Company aware of any “One Touch” programs utilized in other states and communities to address double pole issues? If so, please provide a summary of a few “One Touch” programs adopted/established by other states or communities.
- e. What is the Company’s position with respect establishing a “One Touch” program for the administration and removal of

existing and new double poles in Hawaii? Is adopting and/or stipulating to “One Touch” *concepts* sufficient at this time?

CA-IR-6

Ref: Application, Exhibit B, at 15; and Exhibit E, at 4.

On Page 15 of the Stipulated Double Pole Plan (i.e., Application, Exhibit B), the Parties recognize that overgrown vegetation can slow down pole transfers and removals, and under **Stipulation 12** the Parties agree to: (1) make efforts to timely respond to reasonable vegetation management requests by the Company necessary to assist in double pole transfers; and (2) the concept of using Alden ONE to communicate and track vegetation management related to double poles. Under **Stipulation 13**, recognizing that excessive vegetation growth may impact the integrity of the poles that support its streetlights and traffic signal cables, the C&C has “agreed to enhance its proactive vegetation management program by trimming back vegetation a reasonable distance beyond its allocated space on the pole with the tools its crews have on hand.” (Footnote omitted.) In addition, the Parties agree to continue discussing vegetation as it relates to double poles (**Stipulation 14**).

- a. Please provide a summary of the current protocols regarding vegetation on utility poles.
- b. Is the Company currently prohibited from removing overgrown vegetation on certain portions of the utility pole on its own

initiative? If there are prohibitions, please identify the documents and specific provisions that address this issue, and be as detailed as possible.

- c. In addition, please identify and explain any risks (and/or liabilities) and apportionment of costs, as applicable, regarding the removal of overgrown vegetation as it relates to double poles for the Company.

CA-IR-7

Ref: Application, Exhibit C, at 4-5.

On pages 4-5 of Exhibit C, the Company states the following:

. . . Hawaiian Electric is also issuing a revised RFP to various qualified contractors in an effort to lower the cost of per-pole HT standard transfers and double pole removals by providing bulk removal requirements. Doing so will help address the primary obstacle to the expeditious removal of double poles—limited funding. Lowering the cost of double pole removals will help enable Hawaiian Electric to reach its commitments for removal of backlog double poles and stay on top of preventive double pole removals. Hawaiian Electric is currently drafting an RFP to issue to several qualified contractors and anticipates that by increasing the quantity of poles sent to contractors and grouping them geographically for efficiency, will enable contractors to provide lower bulk pricing, thereby decreasing the overall per-pole cost of removals. This should reduce the costs for long-term projections and will also increase the short-term removals for the remainder of 2024.

- a. Please provide the Company's progress and any additional details regarding the revised request for proposal ("RFP") to various qualified contractors, as described above ("Revised

RFP”).

- b. If not yet issued, when does the Company plan to issue the Revised RFP? Please provide other applicable deadlines, including the date projected for the Company’s final decision regarding the Revised RFP.
- c. How much does the Company anticipate can be saved through the Revised RFP?

CA-IR-8

Ref: Application, Exhibit C, at 6.

Here, under the “Funding” section, the Company states the following:

Funding remains the primary obstacle to accelerating the pace of double pole removals. If these resource constraints were alleviated, it would increase Hawaiian Electric’s ability to address and remove both backlog and preventive double poles. Given that the backlog double poles have a finite quantity and because Hawaiian Electric is under an obligation to remove all of them by 2028, as part of the Stipulated Plan, Hawaiian Electric requests that the Commission seek State funding in the amount of \$500,000 per year for the next four (4) years, until the backlog removals are complete.

- a. Please elaborate regarding the Company’s request that the Commission seek State funding in the amount of \$500,000 per year for the next four (4) years (i.e., \$2,000,000)?
- b. Please provide justification for this request for State funding regarding double poles.
- c. Are there any federal funds available to remediate double pole issues? Can any federal funds be accessed through

respective counties to address double pole issues?

CA-IR-9

Ref: Docket No. 2018-0088, Performance-Based Regulation (“PBR”) proceeding.

Under PBR, the Commission established a number of Performance Incentive Mechanisms (“PIMs”) for the Company. Generally, PIMs are based on quantifiable and measurable indicators that translate into financial rewards or penalties for a utility and can be designed to address specific priority areas such as better reliability, increased energy efficiency, and fewer interconnection delays. Currently, there are 12 approved PIMs under which the Company’s performance is measured (see Company’s Transmittal No. 24-01, Spring Revenue Report, filed on March 28, 2024, in Case No. 2023-04666, at 20).

- a. What is the Company’s position regarding the establishment of a PIM for the administration and removal of existing and new double poles (“Double Pole PIM”)?
- b. Would the Company consider proposing the establishment of a Double Pole PIM in the PBR docket?
- c. In the Company’s view, how should a Double Pole PIM be structured?

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DIVISION OF CONSUMER ADVOCACY'S SUBMISSION OF INFORMATION REQUESTS** 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.

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DATED: Honolulu, Hawaii, May 31, 2024.

/s/ S. Strack

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PUBLIC UTILITIES

COMMISSION

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2024-0121

The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Case and Document Management System (CDMS).