



June 14, 2024

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

Dear Commissioners:

Subject: Dkt 2024-0121 Double Pole Removal Plan
Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and
Maui Electric Company, Limited
Hawaiian Electric Responses to Consumer Advocate's Information Requests

The Hawaiian Electric Companies¹ herein submit the responses to the Consumer Advocate's information requests, filed on May 31, 2024, regarding the Double Pole Removal Plan in the subject proceeding.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura
Director
Regulatory Non-Rate Proceedings

c: Division of Consumer Advocacy

¹ The "Hawaiian Electric Companies" or "Companies" refer to Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

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 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?

Hawaiian Electric Response:

- a. Hawaiian Electric started using Alden One in January 2024, as a pole inventory communication tool required by McLean Engineering (“McLean”), the contractor awarded the pole attachment inventory audit work. McLean used Alden One as a tool to help its clients process pole attachments violations and remediations. Accordingly, when Hawaiian Electric started using Alden One for the limited purposes of processing pole attachment violations, it required the carriers to also use Alden one as part of Hawaiian Electric’s pole attachment audit remediation efforts. See, also, page 3 of Exhibit B to the Application.

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.

- b. Some of the key features of Alden ONE include, streamlined application process, automated work order notification, visual asset map, and custom-built reporting and dashboards
- 1) The security features include, HTTPS secured website, limiting administrator privileges to those identified by Hawaiian Electric, and web application firewall.
 - 2) The information on the system is fully searchable, but no Company data other than attachment violation data has merged onto the system. Alden ONE is currently only being used to communicate known violations picked up from the pole attachment inventory audit. If and when Company pole data is in the system, the data will become searchable.
 - 3) The location of double pole information is not currently available because it is not all on the Alden ONE database. If and when all pole data gets entered into Alden ONE, then the double pole information will be available through the database.
 - 4) All features can be seen on Alden's system website, <https://www.aldensys.com>. Please also see the Company's response to CA-IR-2(b) for more information on the current and future uses of Alden ONE.
- c. The Alden ONE annual subscription is approximately \$0.48 per pole, regardless of the type of database features that Hawaiian Electric utilizes or number of users. There is no upfront cost, only an annual subscription cost based on the number of assets in the system. Hawaiian Electric has not yet finalized its contract with Alden ONE for future use and, therefore, has not finalized the price.

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?

Hawaiian Electric Response:

- a. The information stored and searchable in the JP databases, originally used to document when new poles were erected and to invite joint owners to buy interest in those new poles, does not serve the same purpose as Alden One, which is a communication portal that is currently used by Hawaiian Electric to only address pole attachment violation remediation with third-party attachers. Currently, the Companies collectively are using the JP databases, SAP, a stand-alone pole attachment database and Alden One to research and document various aspects of the pole attachment/joint pole ownership process.
- b. The Companies are currently using the various JP databases referenced in this question to track and manage double poles. As of now, Alden One is simply a communications portal that is being used by all of the Companies' service territories, but for communications necessary to remediate pole attachment violations resulting from the pole attachment inventory audit only. The Company is looking at expanding Alden One on a larger scale,

which would allow the Company to store more Company data in the system and could take the place of the JP database and the PIE stand-alone database, and merge with SAP, at which point it could be used to send NOIs and other notices. But that has not been fully vetted yet or adopted by the Company. In particular, an expansion merging with SAP has many cybersecurity requirements that are simply not necessary when just using it for the limited purposes of communication audit violation remediations. See, also, the Company's response to CA-IR-1(b) for more information.

CA-IR-3

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.

Hawaiian Electric Response:

- a. Yes, the Company is exploring the option of expanding the use of Alden One to incorporate all JP database information, which would allow the Company to issue NOIs and ENs in a more automated, standardized fashion. If for any reason the Company determines that Alden One is not the most suitable database, as it currently believes it to be, the Company would competitively bid or compare similar products as Alden ONE. See, also, the Company’s response to PUC-IR-6(a).

- b. The Company could be willing to commit to issuing NOIs sooner than 30-45 or 60 days. To do so will require getting multiple departments within Hawaiian Electric trained and comfortable entering pole replacement information into Alden One, which is not yet the practice today. For certain pole replacements for planned projects, the Company would be able to implement this after internal coordination. This is something that might be attainable, if and when the Company is able to integrate Alden One with SAP. Many pole replacements, however, are maintenance based and could occur at any time, including within a 30, 45, or 60-day window, which would make 60-days' advance notice impossible.
- c. See the Company's response to subsection (b), above.

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?

Hawaiian Electric Response:

- a. The Company would not be opposed to periodic meetings by all, and on occasion certain specific Stakeholder(s) as issues arise.
- b. In general, the Company recommends quarterly meetings.

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?

Hawaiian Electric Response:

- a. A state-wide One Touch program could be established and implemented, but the Company cannot force attachers to participate. If this became a mandatory requirement, the Commission or Legislature would need to establish it, subject to competing jurisdiction by the FCC. The Company worked with the Stakeholders to voluntarily agree to incorporating a One Touch concept for contractors and made progress in gaining agreement to coordinate

more efforts. Importantly, the Company introduced the idea of shared contractors for transfer of equipment as a “One Touch *concept*” rather than a “One Touch *program*” because the FCC has already established federal regulations for a One Touch Make Ready (“OTMR”) program. Accordingly, since the Company did not want to confuse telecommunications carriers that are already familiar with federal FCC regulations on the OTMR program with certain concepts that are borrowed from that program, the Stakeholders have agreed to a “One Touch concept.” Please see the Company’s response to subpart (d), below, for more information on OTRM.

The Parties realized there would likely be a One Touch process for standard transfers, and a separate One Touch process for non-standard transfers. But even then, it was a difficult conversation to have, considering there were so many sensitivities with each union. Further, since all unions were not directly involved in these discussions, except for Hawaiian Electric’s IBEW Local 1260, it was not something the Parties could stipulate to in detail. The Parties agreed to continue to discuss the idea.

- b. There were two major concerns with One Touch: (1) would the work compete or conflict with established union work by various unions, (2) some carriers or carriers’ clients are not willing or even able to allow other contractors to touch their equipment. Another step in the process is how contractors would invoice each Stakeholder for the work completed and if every Stakeholder would have to have their own procurement contract with each contractor or would there be one master contract. Through the Stipulations, the Parties have started the process for establishing a One Touch concept by sharing lists of approved contractors and committing to provide any shared approved contractors with each party’s color-coded identification tags.

- c. See the Company's response to subpart (b), above.
- d. The Company is not aware of any programs on the mainland where One Touch addresses double pole remediation. The FCC introduced a One Touch Make Ready ("OTMR") program for simple make ready work to accommodate new attachments in its 2018 Order.¹ The FCC's OTMR program can be adopted by any carrier across the country. Hawaiian Electric's idea of adopting a similar One Touch concept for double poles specifically is loosely based on the federal OTMR program.
- e. The Company believes it has made headway with the stakeholders on the idea of adopting One Touch concept in the future related to transfers for double poles. All Parties agree there is work to be done to make sure One Touch can be executed properly. The Company supports continued discussion in this area rather than the Commission enforcing a statewide One Touch program. As the Company has mentioned before, not all stakeholders are under Commission jurisdiction, and pole attachments in Hawaii are currently regulated at the federal level by the FCC. Therefore, a Commission enforced statewide program could be contested by others and may set back advancements the Company has made thus far.

¹ See, 47 CFR § 1.1411(j); FCC 18-111, establishing timelines and responsibilities associated with a OTMR regime for simple make-ready work.

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.

Hawaiian Electric Response:

- a. Generally, Hawaiian Electric will perform vegetation management in and around its facilities including, but not limited to, its poles/guys/anchors. Ideally, the Company tries to inspect and clear each area every 18-24 months. For vegetation in the communications space that the Company observes and believes may either threaten the attacher’s equipment or the integrity of Company poles, Hawaiian Electric sends notice to the attacher(s) to perform corrective vegetation management to correct the condition. Attachers then must correct the condition, or, if they fail to correct the condition within the contractually agreed period, Hawaiian

Electric may perform the corrective vegetation management work and bill the attacher for the cost of doing so plus a small administrative fee.¹

- b. The Company is not prohibited from removing vegetation in the communications space on the pole; however, the Company is not authorized to use ratepayer funds to cover the incremental cost necessary to remove vegetation on an area of the pole. The Company is not responsible for clearing and has contracted with the telecommunications carriers to perform their own vegetation management in the communications space. Currently, the Company's contracts with the carriers do not provide for cost-share of vegetation management in the communication space. But for the presence of wireline attachments in the communications space – where the vegetation latches on and pulls down on the cables – vegetation growth is not typically a problem in that space on the pole. Accordingly, vegetation management in the communication space remains the responsibility of the telecommunications attachers. Attachers, as renters on the pole, typically prioritize vegetation management when their own equipment is rendered inoperable or is threatened, (i.e., reactive as opposed to preventative), whereas the Company considers the safety and reliability of the entire pole and the distribution system as the basis for any vegetation management it performs. As a result, the Company and the attachers differ in viewpoints of when vegetation management is required. See, also, the Company's response to PUC-HECO-IR-2(c).
- c. See the Company's response to subpart (b) above.

¹ See, LAPA sections 8.11, 8.2-8.3; Operating Agreement between Hawaiian Electric and HT at section 21, as partially amended in the parties' Comprehensive Settlement Agreement dated May 20, 2024.

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?

Hawaiian Electric Response:

- a. The Company issued a new double pole RFP on May 8, 2024, to various qualified contractors. The new RFP included two major changes: 1) Lump sum pricing by geographical quadrants of known standard transfer double poles for each island; and 2) Unit pricing by geographical quadrants of future standard transfer double poles. Contractor bids were due and received on May 31, 2024. The Company is currently reviewing the bids and preparing an overall bid evaluation. The Company is expected to award and begin double pole work with the selected contractor(s) by July 1, 2024.
- b. Not applicable, see the response to subpart a. above.

- c. Based on data and feedback received from the contractors, by including a guaranteed set amount of poles a year, there is a potential 30% cost savings. These potential savings are projected to be achieved if the Company is able to issue awards and successfully negotiate contracts under the currently issued RFP, and does not account for unexpected changes in the bids.

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?

Hawaiian Electric Response:

- a. Hawaiian Electric has committed to removing the remaining backlog of standard double poles, with an estimate of 1,300 backlog poles to be removed annually, in the next four (4) years. Hawaiian Electric is doing its best to reduce costs and gain efficiencies, including via the stipulations in this docket and via reduced contractor costs in the Company’s new RFP. However, if additional funding were to be available, it could expedite the removal of the backlog double poles and allow more focus and attention to removing and limiting the presence of new preventive double poles. Additionally, any new outcomes or obligations that come from this docket or agreements with Stakeholders may also require additional funding. Please also see the Company’s response to PUC-HECO-IR-1 and PUC-HECO-IR-8.
- b. See the Company’s response to subpart (a), above.

- c. The Company is not aware of any federal funds to be used towards double pole remediation.

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?

Hawaiian Electric Response:

- a. The Company made commitments and agreed to stipulations through this docket and does not believe a Double Pole PIM is necessary. A PIM would also not address responsibilities and obligations of the Stakeholders and their role in the administration and removal of existing and new double poles.
- b. See the Company’s response to subpart a. above.
- c. See the Company’s response to subpart a. above.

FILED

2024 Jun 14 P 14:08

PUBLIC UTILITIES

COMMISSION

F-308885

2024-0121

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