



July 15, 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 Commission's Information Requests

The Hawaiian Electric Companies¹ herein submit the responses to the Commission's information requests, filed on June 28, 2024, regarding the Double Pole Removal Plan in the subject proceeding.

Sincerely,

/s/ Kevin M. Katsura

Kevin M. Katsura
Director
Regulatory Non-Rate Proceedings

Attachment

c: Division of Consumer Advocacy (w/attachment)

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

PUC-HECO-IR-09

Reference: “Hawaiian Electric Responses to Commission’s Information Requests,” filed on June 14, 2024 (“HECO’s response to PUC IR set 1”), Response to PUC-HECO-IR-01d at 2.

In HECO’s response to PUC IR set 1, Response to PUC-HECO-IR-01d, Hawaiian Electric states that it “has not received any revenues from pole attachments for the years 2024-2039 and therefore does not have a pro forma to provide.”

Please respond to the following:

- a) Provide the estimated future revenues (i.e., pro forma income statement) for joint pole attachments as separated by islands or by service territory for the years 2024-2039.
- b) To the extent that Hawaiian Electric is unable to provide substantive data as requested in subpart a, does Hawaiian Electric expect to receive any revenues from pole attachments for the years 2024-2039? If so, please explain why such estimates cannot be provided for the requested years.

Hawaiian Electric Response:

- a) Please see below for the Company’s estimated projected revenues for pole attachments. Numbers are in the thousands.

Company	2024	2025	2026	2027	2028	2029-2039*
HECO	\$4,583	\$4,628	\$4,675	\$4,722	\$4,769	\$4,817
HELCO	\$1,227	\$1,239	\$1,252	\$1,264	\$1,277	\$1,289
MECO	\$970	\$981	\$990	\$1,000	\$1,011	\$1,020
Total	\$6,780	\$6,848	\$6,917	\$6,986	\$7,057	\$7,126

*Annual Amounts; Hawaiian Electric does not have budget projections for pole attachment revenue farther than five (5) years from 2024.

- b) Please see the response to subpart a).

PUC-HECO-IR-10

Reference: HECO's response to PUC IR set 1, Response to PUC-HECO-IR-01g at 4.

In HECO's response to PUC IR set 1, Response to PUC-HECO-IR-01g, Hawaiian Electric states that it "does not have costs broken down by the categories in this IR, but [Hawaiian Electric] can provide the below rough estimates for standard transfer and double pole removals based on the current RFP responses [Hawaiian Electric] has received."

Please respond to the following:

- a) Please confirm that the rough estimates provided are inclusive of all costs needed for standard transfer double pole removals (e.g., Hawaiian Electric's internal labor and material costs).
- b) Please identify all costs and their categories that are included within the rough estimates provided in the response to PUC-HECO-IR-01g.

Hawaiian Electric Response:

- a) Confirmed, the estimates are inclusive of all costs to remove a standard transfer double pole.
- b) Estimates are comprised of and categorized as contractor labor.

PUC-HECO-IR-11

Reference: HECO's response to PUC IR set 1, Response to PUC-HECO-IR-05a at 1.

In HECO's response to PUC IR set 1, Response to PUC-HECO-IR-05a, Hawaiian Electric, when asked whether it anticipates that increasing the list of eligible contractors will speed up the equipment transfer and double pole removal process, states that "[i]t should." Hawaiian Electric also states that the "approved, eligible contractor list is a list Hawaiian Electric provides to carriers so they know who they can call on to perform work in the field that has already been vetted by the Company." In HECO's response to PUC IR set 1, Response to PUC-HECO-IR-05b, Hawaiian Electric states that it "cannot confirm whether other relevant stakeholders will have sufficient labor resources to achieve their projected goals."

Please respond to the following:

- a) Does Hawaiian Electric agree with the statement that increasing the number of eligible contractors will speed up equipment transfer and the double pole removal process?
- b) Does Hawaiian Electric provide a list of eligible contractors to the other stakeholders that only Hawaiian Electric has vetted? If not, please explain what other stakeholders are involved in the vetting process.
- c) Does Hawaiian Electric believe that there will be sufficient internal and contracted labor resources on Hawaiian Electric's side to meet projected removal goals?

Hawaiian Electric Response:

- a) Yes, Hawaiian Electric agrees that the availability of more eligible contractors could help speed up equipment transfers and the double pole removal process.
- b) No, Hawaiian Electric did not provide a list of eligible contractors to the other stakeholders that only Hawaiian Electric has vetted. However, the Company does have a list with contractors that are approved by Hawaiian Electric, Hawaiian Telcom and Charter. Any contractors that are on one company's list but not on the other(s), are encouraged to be vetted and approved by the others. Not all Stakeholders have agreed to use shared contractors.
- c) Yes, but additional resources could expedite removals.

PUC-HECO-IR-12

Reference: HECO's response to PUC IR set 1, Response to PUC-HECO-IR-07 at 1.

In HECO's response to PUC IR set 1, Response to PUC-HECO-IR-07, Hawaiian Electric states that it "is currently in the process of conducting a service-wide pole attachment inventory audit."

Please respond to the following:

- a) As part of this pole attachment inventory audit, will Hawaiian Electric also inventory the number of backlog double poles, along with their location?
- b) If Hawaiian Electric is not planning to conduct an updated double pole audit annually, then how does Hawaiian Electric plan to maintain an accurate record of the double pole counts (broken down by backlog, preventive, standard transfer, and non-standard transfer types) on an ongoing basis?

Hawaiian Electric Response:

- a) Hawaiian Electric already has the data collected for backlog double poles. Because no new backlog double poles are created, there is no need to conduct future inventories of backlog double poles. The current pole attachment inventory audit does collect data on any double pole locations, but is designed primarily to capture pole attachment locations, volume, and obvious non-compliance with NESC and safety standards.
- b) Hawaiian Electric is permitted by the Federal Communications Commission to conduct pole attachment inventory audits that attachers must contribute their pro rata share of the costs to, no more frequently than once every five (5) years, provided that the audits may be conducted on a rolling basis such that a particular pole is never audited more than once every five (5) years. Hawaiian Electric does not believe that conducting an annual audit paid by ratepayer funds is either in the public interest or feasible, but will continue to perform cyclical attachment audits as necessary in no shorter than five (5) year increments. Hawaiian Electric does, however, keep records of all new pole attachments

requests and pole replacements that have occurred since it took over ownership and management of the communication space from Hawaiian Telcom in 2018. So, to the extent attachers provide accurate and timely information in accordance with their respective attachment agreements, Hawaiian Electric will be able to maintain and provide accurate data in between the rolling five-year audit schedule.

PUC-HECO-IR-13

Reference: Hawaiian Electric Advisory on June 17, 2024 “Reconductoring work Thursday on Lualualei Homestead Rd. To impact traffic in Wai‘anae near Pōka‘i Bay Beach Park.

Hawaiian Electric mentions in this referenced advisory that “Hawaiian Electric crews will replace primary and secondary conductors on several utility poles along Lualualei Homestead Road.”

Would it be possible for Hawaiian Electric to specify in future advisories, such as this one referenced, whether or not Hawaiian Electric is planning to leave behind a double pole or otherwise remove the old pole to leave a single pole standing? If not, please explain. Does Hawaiian Electric require the Commission to order Hawaiian Electric to provide more specific details in its advisories?

Hawaiian Electric Response:

Hawaiian Electric never plans to create and leave a double pole long-term; double poles only exist out in the field until the other applicable attaching parties transfer their equipment off the pole. If Hawaiian Electric replaces a pole and there are no other attaching entities on that pole, then the Company removes it that day if possible. The only reason the poles stay out in the field is because another attaching entity needs to transfer their equipment, which Hawaiian Electric is not responsible for, nor able to do on their behalf. Accordingly, Hawaiian Electric does not believe it is appropriate or necessary to provide notice of any potential short-term double poles, just as it does not believe it is necessary to provide, for example, details about what equipment is involved in reconductoring.

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