

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----)
)
PUBLIC UTILITIES COMMISSION) DOCKET NO. 2022-0212
)
Instituting a Proceeding Relating)
To an Innovative Pilot Process for)
The Hawaiian Electric Companies.)
_____)

DECISION AND ORDER NO. 39099

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DECISION AND ORDER

By this Order,¹ the Public Utilities Commission ("Commission") approves the EV Telematics Pilot ("EV Telematics Pilot"), submitted on February 6, 2023,² pursuant to the Commission's expedited pilot process ("Pilot Process").³

¹The Parties to this proceeding are HAWAIIAN ELECTRIC COMPANY, INC. ("HECO"), HAWAII ELECTRIC LIGHT COMPANY, INC. ("HELCO") and MAUI ELECTRIC COMPANY, LIMITED ("MECO") (collectively, "Hawaiian Electric" or the "Companies") and the DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS, DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate"), an ex officio party to this proceeding, pursuant to Hawaii Revised Statutes § 269-51 and Hawaii Administrative Rules ("HAR") § 16-601-62(a).

²"Hawaiian Electric Companies' EV Telematics Pilot; Notice of Intent; Exhibits A-H; and Certificate of Service," filed on February 6, 2023 ("Notice").

³See Order No. 38663, "Opening the Docket," filed on October 20, 2022 ("Order No. 38663"); and Docket No. 2018-0088, Decision and Order No. 37507, filed on December 23, 2020 ("Decision and Order No. 37507") at 166-181.

Notwithstanding this Order's approval of the EV Telematics Pilot, the Commission is concerned that the Pilot Process may need improvement. While the Commission appreciates that the Companies, stakeholders, and the Commission are still growing acquainted with the novel Pilot Process, the Commission believes the Pilot Process will benefit from further evaluation.⁴ To that end, the Commission intends to host a meeting with the parties and interested stakeholders to discuss the implementation of the Pilot Process to date, including potential areas of improvement. Concomitantly, the Commission instructs Hawaiian Electric to temporarily suspend the filing of any further notices under the Pilot Process until after this meeting.

I.

BACKGROUND

A.

Procedural History

On December 23, 2020, in Docket No. 2018-0088, the Commission issued Decision and Order No. 37507, which established a Performance-Based Regulation ("PBR") Framework to govern the

⁴C.f. D&O 38753 at 2 (noting that the Commission "views the Pilot Process as an iterative process that will continue to evolve and improve as the parties, Commission, and interested stakeholders gain experience with the Pilot Process.").

Hawaiian Electric Companies.⁵ In pertinent part, the PBR Framework provides for the Pilot Process for the Hawaiian Electric Companies “to foster innovation by establishing an expedited implementation process for pilots that test new technologies, programs, models, and other arrangements.”⁶ Pursuant to the above, Hawaiian Electric collaborated with parties and other stakeholders to develop a workplan to support the Pilot Process (“Pilot Workplan”). Briefly, the Pilot Workplan identifies seven categorical areas that the Companies will target for pilot development, based on discussions with stakeholders (“Pilot Categories”).⁷

Following approval of Hawaiian Electric’s Pilot Workplan, the Commission opened this docket on October 20, 2022.⁸

On February 6, 2023, Hawaiian Electric submitted its Notice for the EV Telematics Pilot.

⁵See generally Decision and Order No. 37507.

⁶Decision and Order No. 37507 at 166.

⁷See Docket No. 2018-0088, Letter From: K. Katsura To: Commission Re: Docket No. 2018-0088, Instituting a Proceeding to Investigate Performance-Based Regulation; Hawaiian Electric Companies’ Innovation Pilot Framework Workplan, filed on November 12, 2021. See also Docket No. 2018-0088, Order No. 38578, “Instructing Hawaiian Electric to Supplement the Pilot Framework Workplan Filed November 12, 2021,” filed on August 29, 2022; Docket No. 2018-0088, “Hawaiian Electric Companies’ Supplement to Pilot Framework Workplan” filed on September 23, 2022; and Order No. 38654, “Approving Hawaiian Electric’s Pilot Framework Workplan,” filed on October 19, 2022 (“Order No. 38654”).

⁸See Order No. 38663.

On February 21, 2023, the deadline for public comments on the EV Telematics Pilot passed, with no comments received by the Commission.⁹

On February 24, 2023, the Commission issued information requests ("IRs") to Hawaiian Electric, to which they responded on March 6, 2023.¹⁰

Pursuant to the 45-day period incorporated into the Pilot Process, absent affirmative Commission action by March 23, 2023, the Notice is considered approved as submitted.¹¹

B.

Summary of the EV Telematics Pilot

1.

Rationale

Hawaiian Electric states that more data about electric vehicles ("EVs") are necessary to accommodate their growth and to support the electrification of transportation ("EoT") efforts being made by Hawaiian Electric and other stakeholders,

⁹See Order No. 38663 at 12-13.

¹⁰See Letter From: D. Matsuura To: Commission Re: Docket No. 2022-0212 - Instituting a Proceeding Relating to an Innovative Pilot Process for the Hawaiian Electric Companies; Hawaiian Electric Companies' Responses to PUC-HECO-IRs 1-13, filed on March 6, 2023 ("HECO Response to PUC-HECO-IR-XX").

¹¹See Order No. 38663 at 10-11.

including the City & County of Honolulu, Maui County, Hawaii County, and major car rental companies.¹² Categories of data the Companies state would be useful include:

- Charging behavior details:
 - Plug-in/unplug times and average plug-in duration
 - Charging session location
- Battery level details:
 - Actual charge delivered (kWh)
 - State of charge (battery %)
- Vehicle details
 - Make, model and trim
 - Battery Electric Vehicle ("BEV") vs. Plug-in Hybrid Vehicle ("PHEV")
- Charger equipment details:
 - Home vs. away charging equipment
 - Type of charger (Level 1, Level 2, or DC fast charging)¹³

Hawaiian Electric states that such information would increase visibility into customer charging patterns that could inform system design and EV-specific rate options, as well as provide clearer EV load profiles among the different islands within Hawaiian Electric's service territory.¹⁴

¹²Notice at 6. See also, Notice, Exhibit A (containing letters in support of the Pilot from: the City & County of Honolulu's Office of Climate Change, Sustainability and Resiliency; Hawaii Energy; the Hawaii Electric Vehicle Association; the State of Hawaii, Department of Transportation; and Ulupono Initiative).

¹³Notice at 7-8.

¹⁴Notice at 8.

2.

Proposed EV Telematics Pilot

To address the above needs, Hawaiian Electric has developed the EV Telematics Pilot, which has the “core objectives” of enrolling EV driving participants, collecting telematics data, gaining visibility into EV charging behavior data, and sharing this data with stakeholders and soliciting feedback on its usefulness.¹⁵

Under the EV Telematics Pilot, Hawaiian Electric would contract with EV Energy, a software company, which would use its software platform to “enable[] customer vehicles to wirelessly connect to the existing internet connectivity already embedded by many manufacturers into their EV models[] to collect data (i.e., ‘telematics’), or alternatively, to collect data through internet-connected EV chargers in order to cover any vehicles lacking telematics (for example, pre-2017 models of the Nissan Leaf).”¹⁶ More specifically, the Companies state that their goals for the Pilot are:

¹⁵Notice at 25.

¹⁶Notice at 11.

- Enroll a representative sample size of the Companies' EV customers onto EV Energy's platform. Assuming a total of approximately 20,000 EVs in the Companies' service area, the Companies propose an enrollment target of 2,000 participants (i.e., 10% of total EVs), including an enrollment target of 300 participants for each of Maui County (including Lanai and Molokai) and Hawaii County.
- Gain increased visibility into EV customer charging behavior, including an interactive heatmap of where EVs are being charged, insights on customer habits, and a breakdown of customer vehicle and charging equipment types.
- Share EV data with internal and external stakeholders that have indicated a use for EV data (or request it at a later date), collect feedback over the course of the Pilot, and determine whether the data provides value.¹⁷

"The Pilot will include a customer-facing interface (i.e., a free app available for download on Google and Apple stores) as well as a utility-focused application (i.e., web-based dashboards displaying real-time customer charging data) developed by EV Energy[,]" as illustrated in the graphic below:¹⁸

¹⁷Notice at 12.

¹⁸Notice at 11-12.

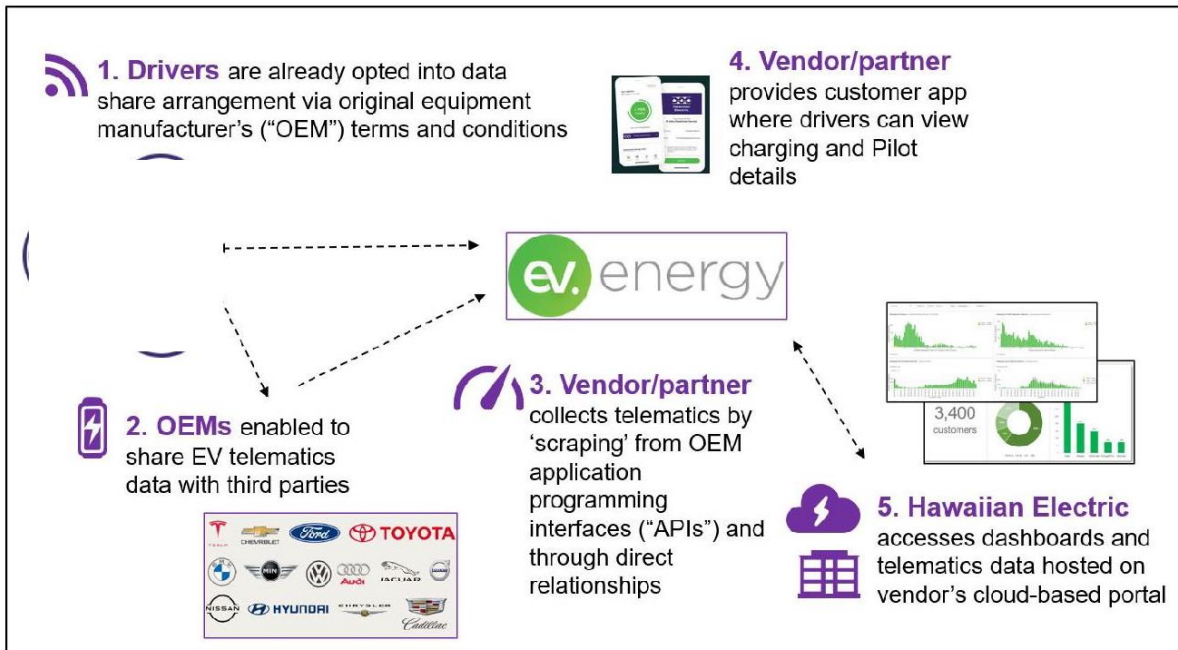


Figure 1. EV Telematics Pilot Concept Diagram.

Pilot participants would consist of EV owners within Hawaiian Electric's service territory. Each pilot participant would be offered an incentive of either \$150 or 10,000 Hawaiian Airlines frequent flier miles, as well as access to the EV Energy mobile app, which will provide them with insights into their EV charging behavior, which may help them better manage their energy use.¹⁹

Hawaiian Electric estimates that the Pilot would run for 18 months, tentatively from second quarter 2023 through September 2024.²⁰ Based on participant feedback and utilization,

¹⁹See Notice at 16-17.

²⁰Notice at 21.

the Companies may propose to extend or modify the Pilot beyond this schedule.²¹

The Companies estimate that the Pilot will cost \$822,000, which will consist of “non-labor outside services and incentive payments for 2,000 Pilot participants.”²² The Companies clarify that they “are not proposing to recover any internal labor expenses for this Pilot, and no capital expenditures are expected for this Pilot.”²³ The Companies further clarify that Ulupono Initiative, LLC has contributed \$100,000 to increase the participant incentive amount to \$150.²⁴

To evaluate the success of the Pilot, Hawaiian Electric proposes to measure the pilot based on the following:

- *Participant enrollment:* Hawaiian Electric aims to enroll at least 80% of the total 2,000 participant limit within the first three months of the Pilot.

²¹Notice at 22. See also, id. at 13 (“Over the course of the Pilot, the Companies will periodically assess the value of the data, backed by stakeholder feedback, and decide whether to pivot or expand the Pilot.”).

²²Notice at 23.

²³Notice at 23. See also id. for a breakdown of the Pilot’s costs.

²⁴Notice at 9.

- *EV charging data collection:* Hawaiian Electric aims to collect various types of EV charging data to help evaluate the Pilot's usefulness.
- *Data sharing and stakeholder feedback solicitation:* Hawaiian Electric plans to share the EV telematics data gained from the Pilot with internal and external stakeholders and survey them quarterly to learn whether the data is of value to them.²⁵

Hawaiian Electric further offers that it will provide reports on the Pilot's progress during quarterly stakeholder meetings and/or any Pilot update meetings.²⁶

3.

Support

Hawaiian Electric states that the Pilot is aligned with numerous State goals and prior Commission orders, including the State's decarbonization goals, the State's receipt of federal funds to help deploy EV charging infrastructure, and the Companies' EoT Strategic Roadmap which has been approved by the Commission.²⁷

²⁵Notice at 25-26.

²⁶Notice at 26.

²⁷See Notice at 13-15. The Companies' EoT Roadmap was the subject of Docket No. 2016-0168.

In addition, Hawaiian Electric submits that the Pilot is consistent with the Pilot Work, and addresses the following Pilot Categories:

- *Decarbonization:* the Pilot supports EV charging, which is expected to reduce the use of imported fossil fuels and increase usage of renewables.
- *Customer Resources and Services:* the Pilot will enable participants to better manage their energy usage and the data could inform future programs.
- *Beneficial Electrification:* the Pilot supports EoT initiatives, including EV adoption, by increasing understanding of charging behavior and informing incentive structures for future programs.
- *Data Sharing, Access, and Analytics:* the Pilot will provide stakeholders with EV telematics data, which will support better decision making and stakeholder collaboration.
- *Technology Innovations:* the Pilot will “test[] an innovative solution through the deployment of an emerging cloud-based technology platform that will enable new data streams and insights on EV charging behavior.”²⁸

Hawaiian Electric also submits that the Pilot satisfies the Pilot Process’ eligibility criteria²⁹:

- *Product or services beyond the sale of basic electric service and alignment with established regulatory goals.* The Pilot propose to collect and share EV telematics data to gain insights on EV charging

²⁸Notice at 15-16.

²⁹See Order No. 38663 at 8-9.

behavior, which is separate from the sale of basic electric service. Also, the Pilot aligns with State energy goal and various Commission orders, including the Advanced Rate Design track of Docket No. 2019-0323 and a number of the Pilot Categories identified in the Pilot Workplan.

- *Funding from alternative resources.* The Pilot leverages contributions from Ulupono and Hawaiian Airlines to increase the incentive for Pilot participants.
- *Cost sharing and Hawaii-based vendors.* As part of the Pilot, EV Energy will perform customer surveys and focus group interviews at no additional cost. Hawaiian Electric states that there are no Hawaii-based vendors that offer EV telematics solutions and was only able to consider non-local vendors.
- *Estimated net present value ("NPV") and other metrics.* Beyond the immediate incentives paid to Pilot participants, the benefits of the Pilot, such as carbon reduction, are not quantifiable.
- *Access to data.* A key objective of the Pilot is to share EV telematics data with internal and external stakeholders and to solicit feedback on its

usefulness. These include the State Department of Transportation and the county governments of Hawaiian Electric's service territory.

- *Participant surveys and progress against success criteria.* The Pilot will feature semi-annual surveys and focus groups with participants help measure progress and success.³⁰

In addition, Hawaiian Electric addresses guidance the Commission recently provided on the Pilot Process in Decision & Order No. 38753,³¹ including: the benefits to both participants and non-participants of the Pilot; how and why the Pilot is considered innovative; how the Pilot aligns with State energy goals and Commission orders in a distinct way; the stakeholder engagement that went into developing the Pilot; the inclusion of specific use cases to illustrate the potential benefits of the Pilot; how the Pilot represents an efficient use of resources; and the provision of succinct references to similar EV telematics initiatives on the mainland.³²

³⁰Notice, Exhibit E at 1-5.

³¹Decision and Order No. 38753, filed on December 8, 2022 ("D&O 38753") (approving Hawaiian Electric's Data Analytics Clearinghouse Pilot).

³²Notice, Exhibit F at 1-10.

II.

DISCUSSION

A.

Compliance With Notice Filing Requirements

As set forth in Order No. 38663, a pilot notice must comply with certain filing requirements.³³ Upon review, the Commission finds that, on the whole, the Notice sufficiently complies with these requirements, as summarized below. In reaching this determination, the Commission considered both the supporting materials provided by the Companies, as well as the nature of the EV Telematics Pilot, itself.

As it pertains to the Notice and supporting materials, the Commission finds that the Notice:

- Contains a narrative explanation of the EV Telematics Pilot;³⁴
- Offers how the EV Telematics Pilot can provide benefits, both to participants and non-participants;³⁵
- Proposes that participation in the EV Telematics Pilot be capped to 2,000 participants, based on the Companies observation that “[o]ther utilities have

³³See Order No. 38663 at 8-10; and Notice at 10-13.

³⁴See Order No. 38663 at 9; and Notice at 16-21.

³⁵See Order No. 36883 at 9; and Notice 16-18.

initially used 10% of enrollment targets for their EV telematics pilots/programs[;]”³⁶

- Explains that a greenhouse gas (“GHG”) analysis was not included because the Companies do not believe a GHG analysis applicable to the EV Telematics Pilot, as “the scope of this Pilot primarily relates to data collection, sharing the data, and evaluating its usefulness, and, as such, a lifecycle analysis of GHG emissions is not applicable to this Pilot[;]”³⁷
- Estimates that the EV Telematics Pilot will cost \$822,000 and is not intended generate any revenue at this time;³⁸
- Provides a project timeline of approximately 18 months for the EV Telematics Pilot;³⁹ and
- Proposes several categories of metrics for measuring the success of the EV Telematics Pilot, as well as periodic reports on the progress of the Pilot.⁴⁰

³⁶See Order No. 38663 at 9; and Notice at 12 (including n.31).

³⁷See Order No. 38663 at 9; and Notice at 1, n.1.

³⁸See Order No. 38663 at 10; and Notice at 23-25.

³⁹See Order No. 38663 at 10; and Notice at 21-22.

⁴⁰See Order No. 38663 at 10; and Notice at 25-27.

Hawaiian Electric states that desired outcomes of the EV Telematics Pilot include: enrolling at least 80% of the participant target within the first three months; collecting a variety of charging data; and soliciting feedback from stakeholders on data sharing from the Pilot.⁴¹ Hawaiian Electric also describes how the Pilot will support State energy goals and Commission orders by supporting decarbonization efforts, EoT initiatives, and advanced rate design for EV ratepayers.⁴²

Hawaiian Electric also acknowledges the potential overlap between the EV Telematics Pilot and the Data Clearinghouse Pilot and clarifies that they serve distinct purposes.⁴³ “The EV Telematics is a ‘transactional system’ and a ‘System of Record,’” and serves as a primary aggregator of data. In comparison, the Data Clearinghouse takes data from multiple Systems of Record and aggregates that data for analytics purposes.⁴⁴ As the Companies explain, “[t]he purpose of transacting and operating the data in source systems [(i.e., the EV Telematics Pilot)] versus aggregating multiple systems for

⁴¹See Order No. 38663 at 10; and Notice at 25-26.

⁴²See Order No. 38663 at 10; and Notice at 13-16.

⁴³See Order No. 38663 at 10.

⁴⁴Notice, Exhibit F at 4.

comparative analytics [(i.e., the Data Clearinghouse Pilot)] are two separate functions.”⁴⁵

Upon considering the above, the Commission finds that the Notice substantially comports with the filing requirements set forth in Order No. 38663. Specifically, Hawaiian Electric has supported the Notice with material addressing the requirements set forth in Section II, Paragraphs 6.C and D of Order No. 38663, as well as describing how the EV Telematics Pilot supports several of the identified categories under Section II, Paragraph 6.A.

However, review of a pilot notice also involves a qualitative examination of the merits of pilot itself, which is provided below.

B.

Approving the EV Telematics Pilot

Upon considering the Notice, the Companies’ responses to the Commission’s IRs, and the record for this Notice, the Commission approves the EV Telematics Pilot. In particular, the Commission finds the EV Telematics Pilot addresses the considerations in Section II, Paragraph 6 of Order No. 38663 as follows:

⁴⁵Notice, Exhibit F at 4.

- The EV Telematics Pilot is responsive, in various degrees, to the Pilot Categories of “Decarbonization,” “Customer Resources and Services,” “Beneficial Electrification,” “Data Sharing, Access, and Analytics,” and “Technology Innovations and Cybersecurity Improvements” identified in the Pilot Workplan.⁴⁶
- The EV Telematics Pilot is intended to provide a product and/or services beyond the sale of basic electric service and is aligned with various State and Commission regulatory goals through improving the nature of, and access to, EV charging data.⁴⁷
- The EV Telematics Pilot incorporates funding from Ulupono and Hawaiian Airlines to increase the incentives for Pilot participants.⁴⁸ In addition, Hawaiian Electric states that EV Energy will provide certain services, such as customer surveys and focus group interviews, at no additional cost.⁴⁹

⁴⁶See Order No. 38663 at 8 (listing the seven categories for pilot notices); and Notice at 15-16.

⁴⁷See Order No. 38663 at 8; and Notice, Exhibit F at 1.

⁴⁸See Order No. 38663 at 8; and Notice at 9 and 24.

⁴⁹Notice, Exhibit E at 2-3.

Hawaiian Electric also states that it will not seek to recover any internal labor expenses or capital costs for the EV Telematics Pilot.⁵⁰

- Although EV Energy is not a local vendor, Hawaiian Electric explains that there are no local vendors that offer EV Telematics solutions for utilities.⁵¹
- Due to the nature and scope of the EV Telematics Pilot, Hawaiian Electric has not provided estimates for the NPV of the Pilot.⁵² The Companies state that they are not assessing user fees for the Pilot, and it is not expected to generate revenue, making cost savings unquantifiable at this time.⁵³
- Data from the EV Telematics Pilot will be made available to certain stakeholders, including the State Department of Transportation, the City & County of Honolulu, Hawaii County, Maui County, the Consumer Advocate, and the Commission.⁵⁴

⁵⁰Notice, Exhibit F at 9.

⁵¹See Order No. 38663 at 9; and Notice, Exhibit E at 3.

⁵²See Order No. 38663 at 9.

⁵³See Notice, Exhibit E at 3.

⁵⁴See Order No. 38663 at 9; and Notice, Exhibit E at 4.

- The Companies plan to solicit periodic feedback from EV Telematics Pilot participants and stakeholders who receive Pilot data to evaluate the overall progress of the Pilot, including potential improvements.⁵⁵

In addition, Hawaiian Electric has described how the Pilot is intended to serve the specific need for EV charging data and is intended to inform efforts around EV charging options, including siting for EV charging infrastructure and improved rate design choices for EV customers. Hawaiian Electric has also described how the Pilot is expected to provide benefits to other entities with whom Hawaiian Electric plans to share the telematics data and who are pursuing their own EoT and EV initiatives. The City & County of Honolulu Office of Climate Change, Sustainability and Resiliency, Hawaii Energy, the Hawaii Electric Vehicle Association, the State Department of Transportation, and Ulupono have all provided letters of support for the EV Telematics Pilot.⁵⁶

For the reasons discussed above, the Commission approves the EV Telematics Pilot, pursuant to the Pilot Process.

⁵⁵See Order No. 38663 at 9; Notice at 18 and 26 and Exhibit E at 4-5.

⁵⁶Notice, Exhibit A.

Notwithstanding this approval, the Commission believes that the Pilot Process can continue to improve and that these initial pilot notices (i.e., the Data Analytics Pilot and the EV Telematics Pilot) have provided valuable experience to evaluate the implementation of the Pilot Process. Accordingly, at this juncture, the Commission believes it would be prudent to meet with the parties and interested stakeholders to evaluate the Pilot Process and collaboratively discuss how it may be improved outside of the context of a particular pilot notice. This may include some revisions to the Pilot Process and/or Pilot Workplan to refine notice requirements and/or better reflect the Pilot Process' objectives and expectations.

This is not a critique of the Pilot Process or Hawaiian Electric's efforts related thereto. As discussed above, Hawaiian Electric has complied with the requirements of the Pilot Process and attempted to address guidance previously provided by the Commission. Rather, the Commission appreciates that this is only the second notice submitted under the Pilot Process and that the parties, the Commission, and stakeholders are still gaining familiarity with this Process. As stated in D&O 37507, the Pilot Process arose from the recognition that a more flexible regulatory approach may be

appropriate for certain pilot projects.⁵⁷ To address this situation, the Pilot Process is intended to be a new kind of regulatory process, and the Commission finds that taking this opportunity to discuss it with the parties and stakeholders will improve its chances for success.

C.

Next Steps

The Commission will schedule and host an informal meeting with the parties and interested stakeholders to discuss the Pilot Process and potential areas for improvement. This meeting is intended to be collaborative. The Commission is hopeful that candid, informal discussion will help move this process forward and improve its quality and efficiency.

Relatedly, the Commission believes it is prudent to temporarily suspend the submission of pilot notices under the Pilot Process until after this meeting takes place. The Commission believes that this is administratively efficient, so that Hawaiian Electric can consider the Commission's guidance and related discussions before submitting its next pilot notice. Recognizing that Hawaiian Electric has notified the Commission

⁵⁷See D&O 37507 at 169-170.

that it is currently working on other pilot notices, the Commission will strive to hold this meeting during Q2 of 2023.

III.

ORDERS

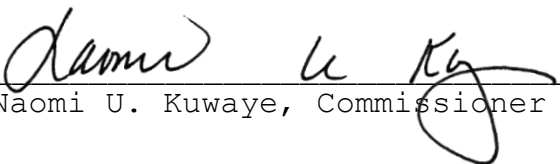
THE COMMISSION ORDERS:

1. Hawaiian Electric's EV Telematics Pilot is approved.
2. The Commission will schedule a meeting with the parties and stakeholders to discuss the Pilot Process, including potential refinements and improvements.
3. Pending the outcome of the meeting referenced in Paragraph No. 2, above, there shall be a temporary suspension of submitting pilot notices under the Pilot Process in this docket.

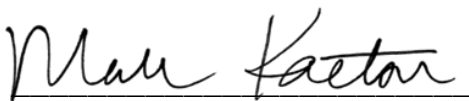
DONE at Honolulu, Hawaii MARCH 22, 2023.

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By 
Leodoloff R. Asuncion, Jr., Chair

By 
Naomi U. Kuwaye, Commissioner

APPROVED AS TO FORM:


Mark Kaetsu
Commission Counsel

By 
Colin A. Yost, Commissioner

CERTIFICATE OF SERVICE

The foregoing Order was served on the date it was uploaded to the Public Utilities Commission's Document Management System and served through the Document Management System's electronic Distribution List

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COMMISSION

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