

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.)
)

ORDER NO. 41023

APPROVING ADDITIONAL MODIFICATIONS TO THE
CHARGE READY HAWAII PILOT PROJECT

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APPROVING ADDITIONAL MODIFICATIONS TO THE
CHARGE READY HAWAII PILOT PROJECT

By this Order,¹ the Public Utilities Commission ("Commission") approves Hawaiian Electric's request to modify the Charge Ready Hawaii Pilot Project ("Charge Ready Pilot") filed on

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). Pursuant to Order No. 38663 (opening the docket), this proceeding is intended to receive filings and adjudicate requests submitted by Hawaiian Electric pursuant to the innovative pilot process under the Performance-Based Regulation Framework. See Order No. 38663, "Opening the Docket," filed on October 20, 2022 ("Order No. 38663"). See also, Docket No. 2018-0088, Decision and Order No. 37507, filed on December 23, 2020. Due to the nature of this docket, motions to intervene or participate are not contemplated; however, any interested person, including the Consumer Advocate, may file comments on an individual pilot notice. See Order No. 38663 at 5-7.

July 26, 2024,² pursuant to the Commission's expedited pilot process ("Pilot Process").³ This represents Hawaiian Electric's second request to modify the Charge Ready Pilot ("Second Modification Request").⁴ As a result, Hawaiian Electric may remove the dedicated metering and Commercial EV rate enrollment requirements for secondary-metered customers who enroll in the Charge Ready Pilot that have no practicable option for a new meter location.

I.

BACKGROUND

A.

The Charge Ready Pilot

The Charge Ready Pilot was initially the subject of Docket No. 2020-0202. Briefly, the pilot involves:

[I]nstalling make-ready infrastructure to enable an estimated 180 charging ports in the Companies' service territories. This is intended to support

²Letter From: J. Jarmon To: Commission Re: Docket No. 2022-0212 - Innovative Pilot Process; Proposed Modification to Charge Ready Hawai'i Pilot, filed on July 26, 2024.

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.

⁴The Commission previously granted a request from Hawaiian Electric to modify the Charge Ready Pilot on March 7, 2024. See Order No. 40650, "Approving Modifications to the Charge Ready Hawaii Pilot Project" ("Order No. 40650").

customer installation of EV charging infrastructure at commercial sites, multi-unit dwelling ("MUDs"), and fleet parking locations at the Companies' expense. The Pilot would target 30 customer sites, over a 3-year period, across the three Companies (the individual capital expenditure for each Company is not expected to exceed \$2.5 million), at a total cost of no more than \$4.98 million.⁵

In pertinent part, Charge Ready Pilot participants must follow certain requirements, including, in pertinent part:

- g. Participant agrees to take service on the proposed EV-J or EV-P tariffs, if the tariffs are approved. The charging station must be separately metered from the rest of the site to support data collection.⁶

The Companies proposed to implement the Charge Ready Pilot in three phases:

- (1) Design, during which the Companies will develop necessary documentation for Pilot implementation, while continuing to solicit customer interest (estimated to be six (6) to eight (8) months),
- (2) Implementation, during which the Companies will work with customers to confirm eligibility and site sufficiency, as well as design, construction, and installation of make-ready infrastructure (estimated to be 18 months), and
- (3) Utilization and Data Collection (estimated to be 12 months), which will begin following completion of the

⁵Docket No. 2020-0202, Decision and Order No. 38194, filed on January 24, 2022 ("D&O 38194"), at 8-9. "Make-ready" refers to "all infrastructure that the customer would otherwise be responsible for under Rule 14 Service Connections and is necessary to provide electrical service to the charging stations (including facilities on the customer side of the meter), but excludes the charging stations, which are provided by the customer." Id. at 8 n. 25.

⁶D&O 38194 at 14.

Implementation phase and will involve the Companies collecting data⁷

On September 23, 2022, following the Design phase of the Charge Ready Pilot, the Companies filed their Final Design Report for Charge Ready Pilot.⁸ In pertinent part, the Final Design Report clarified:

In order to ensure wide participation and funding for as many participants as possible the Company added a per project monetary cap to the Pilot. The Company will install the Make-Ready Infrastructure required to support the installation of four to six Level 2 charging ports in an amount not to exceed \$90,000 per site, at no cost to the Participant. If the cost exceeds the \$90,000 cap, the Participant has the option to pay excess costs, reduce the number of charging ports, or request other changes to the Final Design, to reduce the projected installation costs.⁹

On October 25, 2022, the Companies launched the Charge Ready Pilot.¹⁰

⁷D&O 38194 at 16-17.

⁸Docket No. 2020-0202, Letter From: K. Katsura To: Commission Re: Docket No. 2022-0202 - Hawaiian Electric Companies For Approval of Charge Ready Hawaii Pilot Project; Final Program Design Report, filed on September 23, 2022 ("Program Design Report").

⁹Program Design Report at 10.

¹⁰Docket No. 2020-0202, Letter From: K. Katsura To: Commission Re: Docket No. 2020-0202 - For Approval of the Charge Ready Pilot Project and to Recover Costs through the Renewable Energy Infrastructure Program Surcharge; Response to Consumer Advocate's Final Program Design Report Comments, filed on November 23, 2022. See also Program Design Report at 5 (stating that "Pilot launch will occur after the expiration of the 30-day review period, or upon completion of any action ordered by the Commission upon completion of its 30-day review.").

On March 7, 2024, the Commission issued Order No. 40650, which granted Hawaiian Electric's first request to modify the Charge Ready Pilot by removing certain requirements for primary-metered participants. Specifically, due to costs required to install a dedicated meter to enroll primary-metered participants in a Commercial EV rate¹¹ (a pilot requirement), the Companies asked that the requirement for primary-metered customers to enroll in a Commercial EV rate be removed.¹² The Commission granted the Companies' request, taking into account the limited number of pilot participants expected to be affected by this change, the ability of Hawaiian Electric to still collect other forms of data from participants, and that the change would not increase the Pilot's costs.¹³

On July 26, 2024, Hawaiian Electric filed its Second Modification Request.

¹¹Commercial EV rates refer to Schedule EV-J and EV-P.

¹²See Order No. 40650 at 5.

¹³See Order No. 40650 at 9-11.

B.

Proposed Modifications

Similar to issues reflected in its first request to modify the Charge Ready Pilot, Hawaiian Electric now requests to remove the dedicated metering and Commercial EV enrollment requirements for secondary-metered participants to the Pilot.

In particular, the Companies state:

During the Design and Build phase of the Pilot Implementation Schedule[], as the Company refined the detailed site designs, it became apparent there was not a practicable option to install a separately metered service at six to eight sites, as the designs would require extensive and costly upgrades to install a new meter.¹⁴

The Companies further state that they explored alternatives, but determined that these could cause damage to customer equipment, violate the Companies' Electric Service Installation Manual requirements, or increase costs beyond the \$90,000 allotted for each participant site (thereby discouraging participation).¹⁵ Accordingly, "the Compan[ies] determined that

¹⁴Second Modification Request at 2. (A separate meter is necessary to enroll participants in Schedule EV-J or EV-P).

¹⁵Second Modification Request at 2. As part of the Charge Ready Pilot, the Companies will install EV charging infrastructure at a participant's site. To ensure wide participation opportunities and to stay within the Pilot's budget, the Companies have allotted up to \$90,000 per site to cover the costs of installing infrastructure. If costs exceed \$90,000, the participant is responsible for any excess costs, which practically discourages participation for sites that will

the requested modification is the most cost-effective option to continue to enable participation for those customers, while mitigating risk.”¹⁶

The Companies clarify that they would still install a non-utility meter at exempted participant sites. While this will not allow participants to enroll in Commercial EV rates, it will still allow Hawaiian Electric to receive charging session data, albeit not EV rate meter data.¹⁷ The Companies expect that this modification will affect between six and eight participants out of the total 18 anticipated Charge Ready Pilot participants.¹⁸

This modified configuration for secondary-metered customers is reflected in Figure 2 reproduced below:¹⁹

require more than \$90,000 in infrastructure improvements. See Docket No. 2020-0202, Letter From: K. Katsura To: Commission Re: Docket No. 2020-0202 - Hawaiian Electric Companies For Approval of Charge Ready Pilot Project; Final Program Design Report, filed on September 23, 2022 (“Final Design Report”) at 10.

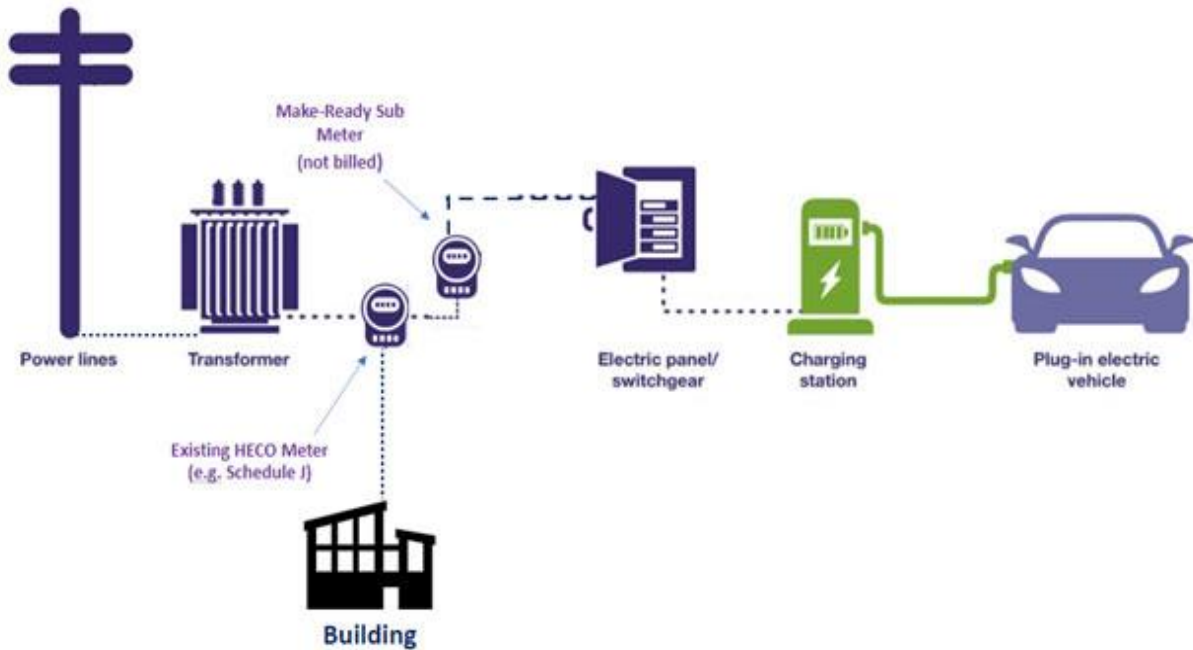
¹⁶Second Modification Request at 3.

¹⁷Second Modification Request at 4.

¹⁸Second Modification Request at 4.

¹⁹Response to PUC-HECO-IR-01.a, filed on February 20, 2024.

Figure 2. Make-Ready Infrastructure Configuration with Non-Utility Sub-Meter



II.

DISCUSSION

Under the Pilot Process, a request to modify an approved pilot requires Commission approval and must be submitted 45 days in advance of the proposed modification.²⁰

The Commission finds that the Companies' Second Modification Request is timely. Although the Companies have not proposed a specific date for the modifications to take effect, they have submitted a request pursuant to the

²⁰See Order No. 38663, "Opening the Docket," filed on October 20, 2022 ("Order No. 38663") at 11 (citing Decision and Order No. 37507, filed on December 23, 2020, at 174).

Pilot Process, which contemplates approval of the request within 45 days unless the Commission takes affirmative action.²¹ Thus, the request to modify the Charge Ready Pilot is made at least 45 days in advance of its proposed effect.

Upon review of the record, the Commission finds the Companies' proposed modifications to the Charge Ready Pilot reasonable. In reaching this conclusion, the Commission considers the following:

1. The modifications are expected to increase enrollment in the Charge Ready Pilot by between six and eight participants.²²

A. While these exempted secondary-metered participants will not be incentivized to charge EVs during the daytime due to their non-enrollment in the Commercial EV schedules, they will still provide "energy consumption data which will provide insights into the sites' overall utilization, total energy consumption, and estimated revenue from EV charging."²³

²¹Order No. 38663 at 11-12.

²²Second Modification Request at 2.

²³Second Modification Request at 4. See also, id. at 5 (identifying charging session data fields expected to be collected from the non-utility sub-meter).

2. The modifications are expected to support some of the goals or objectives of the Charge Ready Pilot.²⁴

A. According to Hawaiian Electric, the modifications will allow more sites to participate in the Charge Ready Pilot, which will allow the Companies to learn from installing make-ready infrastructure and developing approaches to address challenges they encounter.²⁵

3. The modifications are not expected to increase the Pilot's per customer or overall costs.

A. As noted above, the Charge Ready Pilot affords up to \$90,000 for each participant site.²⁶ The modifications represent a means by which to increase participation in the Pilot without needing to increase Pilot costs.²⁷

²⁴Second Modification Request at 5-6; see also Letter From: Y. Kaplan To: Commission Re: Docket No. 2022-0212 - Innovative Pilot Process; Hawaiian Electric Responses to PUC-HECO-IRs 01-05, filed on August 26, 2024 ("Response to PUC-HECO-IR-XX"), at Response to PUC-HECO-IR-01.a.

²⁵Response to PUC-HECO-IR-01.a.

²⁶Final Design Report at 10.

²⁷See Response to PUC-HECO-IR-02.a (reflecting the comparative costs of the modified non-utility meter to the dedicated utility meter for the affected participant sites).

4. The Commission previously approved a similar modification request for the Charge Ready Pilot for primary-metered customers.²⁸

5. The Commission did not receive any comments regarding the proposed modifications.²⁹

Notwithstanding the above, the Commission expresses concern over the evolving nature of the Charge Ready Pilot. As noted as part of their first request to modify the Charge Ready Pilot, the Companies stated that due to Pilot cost constraints, they estimated that up to 20 participant sites could be accommodated within the Pilot budget.³⁰ In response to the Companies' first request to modify the Charge Ready Pilot to remove the dedicated meter requirement for primary-metered customers, the Companies indicated that this is expected to accommodate two primary-metered participants.³¹

As part of their Second Modification Request, the Companies state that the proposed modifications for

²⁸See Order No. 40650.

²⁹See Order No. 38663 at 12-13 (Paragraph 10).

³⁰See Letter From: A. Marceau To: Commission Re: Docket No. 2022-0212 - Innovative Pilot Process; Hawaiian Electric Responses to PUC-HECO-IRs 06-09, filed on March 4, 2024 ("First Modification IR Response to PUC-HECO-IR-XX"), at First Modification IR Response to PUC-HECO-IR-06.b.

³¹First Modification IR Response to PUC-HECO-IR-07.e.

secondary-metered customers "is expected to apply to between six and eight customer sites of the current total 18 anticipated sites."³² This indicates that of the total 18 Pilot participants, between 8 and 10 participants (two primary-metered participants and between six and eight secondary-metered participants) will not be enrolled in Commercial EV rates. While the Commission notes that increased enrollment may support several of the Pilot's purposes, including developing ways for the Companies to support make-ready infrastructure for EV charging stations and enabling and accelerating the electrification of vehicles in the Companies' service territories, the lack of enrollment in Commercial EV rates does not support the Pilot's third purpose of "[i]mprov[ing] renewable energy integration through EV charging on the proposed EV-J and EV-P tariffs."³³ The Commission reminds Hawaiian Electric that the Charge Ready Pilot should seek to test a program that serves all three purposes and that focus should not be diverted from assessing how this Pilot may support EV charging utilizing Commercial EV rates approved by the Commission.

³²Response to PUC-HECO-IR-01.b.

³³See Second Modification Request at 1-2 (citing to Docket No. 2020-0202).

III.

ORDERS

THE COMMISSION ORDERS:

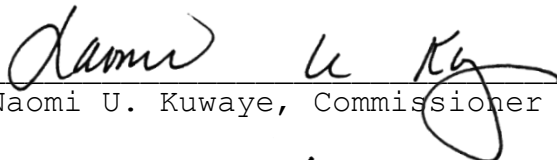
Hawaiian Electric's request to modify the Charge Ready Pilot, as proposed in the Second Modification Request filed on July 26, 2024, is granted.

DONE at Honolulu, Hawaii SEPTEMBER 9, 2024.

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By 

Leodoloff R. Asuncion, Jr., Chair

By 

Naomi U. Kuwaye, Commissioner

By 

Colin A. Yost, Commissioner

APPROVED AS TO FORM:



Mark Kaetsu
Commission Counsel

2022-0212.ljk

CERTIFICATE OF SERVICE

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

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