



October 21, 2025

The Honorable Chair and Members
of the Hawai'i Public Utilities Commission
Kekuanao'a Building, First Floor
465 South King Street
Honolulu, Hawai'i 96813

Dear Commissioners:

Subject: Docket No. 2022-0212 – Innovative Pilot Process
Hawaiian Electric Companies' Response to Decision and Order No. 41980

In accordance with Ordering Paragraph No. 2 of Decision and Order No. 41980 (“D&O 41980”), issued on October 6, 2025, in the subject proceeding, the Hawaiian Electric Companies¹ hereby notify the Commission that they accept the conditions set forth in D&O 41980.² The Companies greatly appreciate the Commission’s approval of the Wildfire Enhanced Fast Trip Reliability Mitigation Pilot (“Pilot”). With this letter, the Companies provide their interpretation of and plan for compliance with each of the Commission’s conditions, as the Companies plan to move forward with the Pilot in short order.

As an initial matter, the Companies reiterate that this reliability enhancement Pilot is of critical and immediate importance for customers. The deployment of Enhanced Fast Trip (“EFT”) settings, while essential for wildfire risk mitigation, has negatively impacted service reliability as evidenced by significant increases in both the frequency and duration of outages (SAIFI/SAIDI) on affected circuits. Moving forward immediately with this Pilot is the responsible course of action to validate technical solutions that restore service reliability closer to pre-EFT levels while maintaining critical fire safety protocols. This Pilot is expected to benefit customers on the piloted circuits by delivering quantifiable reductions in outages without compromising the safety benefits of EFT. If the Pilot is successful, the piloted equipment could be deployed to an additional 29 distribution circuits.

D&O 41980 approved the Pilot subject to five (5) conditions,³ each of which is addressed below:

- (1) Track and report, for the circuits on which the Pilot is deployed, on the frequency of fast trip events, the number of circuit-days when EFT is enabled, and the frequency and duration in customer hours of unplanned outages resulting from EFT enablement, both total and at the circuit level, as well as whether this reflects a reduction or increase in fast trip events and/or outages. The Companies should also include a table listing all coordinated and uncoordinated trips for each Pilot circuit along with the duration, in*

¹ The “Hawaiian Electric Companies” or “Companies” are Hawaiian Electric Company, Inc., Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited.

² See D&O 41980, Section II.C, at 21-24.

³ *Id.*

customer hours, of each outage as well as the customer outage hours avoided by each coordinated trip.

Hawaiian Electric Companies’ Response:

For Condition No. 1, the Companies agree to track and report, for the circuits on which the Pilot is deployed, on the frequency of fast trip events, the number of circuit-days when EFT is enabled, and the frequency and duration in customer hours of unplanned outages resulting from EFT enablement, both total and at the circuit level, as well as whether this reflects a reduction or increase in fast trip events and/or outages. The Companies will also include a table listing all coordinated and uncoordinated trips for each Pilot circuit along with the duration, in customer hours, of each outage, however, the Companies clarify that they will not know the duration in customer hours for outages that were avoided by a coordinated trip (i.e., EFT of entire circuit blocked). For example, if an outage is avoided, the Companies will not know how long it would have been for a trouble inspector and/or crew to find and resolve the cause of the outage. However, the Companies will provide, as a part of Pilot reporting, an estimate of duration in customer outage hours that were avoided for each coordinated trip.

- (2) Track and report on the Pilot equipment’s rate of success in blocking EFT or reclose events compared to total opportunities to attempt the blocking of EFT or reclose and/or how this data supports a finding that the Pilot was successful;*

Hawaiian Electric Companies’ Response:

For Condition No. 2, the Companies will track and report on this condition.

- (3) Quantitatively assess the electric service reliability impacts of its EFT and Public Safety Power Shutoff (“PSPS”) wildfire mitigation programs including but not limited to tracking and reporting on the reliability impacts as an economic cost using a value of lost load framework;*

Hawaiian Electric Companies’ Response:

In their Reply Statement of Position filed in the Wildfire Safety Strategy proceeding (Docket No. 2025-0156), the Companies stated the following:

The Companies have also been working to develop methods to integrate the impacts of PSPS into their quantified risk assessment. It should be noted that quantifying reliability impacts may warrant a broader policy discussion with the Commission and stakeholders on the appropriate valuation and data to utilize, as the cost of an outage has implications for other types of capital-intensive investments such as those that generally improve reliability on the transmission and distribution system, adequacy of supply, among others. Reliability impacts or the cost of an outage should not be determined in isolation for wildfire investments as it similarly applies

to many other types of investments and activities the Companies conduct outside of wildfire mitigation.⁴

For Condition No. 3, the Companies maintain that quantifying reliability impacts may warrant a broader policy discussion with the Commission and stakeholders on the appropriate valuation and data to utilize. Absent those broader policy discussions and solely for the purposes of the Pilot, the Companies will provide with Pilot reporting, a quantitative assessment of electrical service impacts of EFT on the Pilot circuits based on publicly available research conducted with comparable mainland utilities using a value of lost load framework.

It is important to note that the Pilot will not mitigate the reliability impacts of a PSPS event, and therefore, PSPS will not be included in the quantitative assessment.

(4) Consider conducting customer surveys before and after the Pilot or implementing targeted outreach to collect feedback from customers on the Pilot circuits and track and report on any customer feedback, provided this requirement will not unduly delay the Pilot timetable. The Companies shall include in the reporting an explanation on how and why the process or method employed for obtaining customer feedback was determined and established; and

Hawaiian Electric Companies’ Response:

For Condition No. 4, the Companies will consider conducting customer surveys before and after the Pilot or implementing targeted outreach to collect feedback from customers on the Pilot circuits and track and report on any customer feedback, provided this requirement will not unduly delay the Pilot timetable. The Companies will assess timing (e.g., whether it is feasible to gather feedback prior to the Pilot implementation), survey design, overall work, and costs involved to collect the customer feedback in considering what options may be most feasible and most likely to result in useful data.

(5) Track and report on whether and how the Pilot specifically addressed the objective of reducing the impact of reliability disruptions caused by wildfire mitigation on low-to-moderate income customers, customers with special medical needs, kupuna customers, public safety partner customers, and critical facility customers.

Hawaiian Electric Companies’ Response:

For Condition No. 5, the Companies will report on how the fault signaling equipment supports the objective of the Pilot – namely, reducing the impact of reliability disruptions caused by EFT on Pilot circuits measured by the metrics identified in the Pilot Notice and Condition No. 1.

The Companies currently have the capability to retrieve customer counts on each circuit for the following categories:

⁴ *Hawaiian Electric’s Reply Statement of Position*, filed on August 27, 2025, in Docket No. 2025-0156, at 12-13.

- Customers who have received financial assistance from the Hawaii Home Energy Assistance Program (“H-HEAP”), formerly LIHEAP;⁵
- Customers enrolled in the Special Medical Needs Rate Program;⁶
- Customers who have indicated the use of life support equipment.⁷

Additionally, the Companies track the number of critical infrastructure customers on each circuit. These customers are defined as service providers or facilities essential to maintaining public safety, health, and well-being during a power outage, and that require uninterrupted power supply to ensure service continuity. Examples include hospitals, police and fire stations, emergency response systems, water supply, wastewater treatment facilities, communication service, etc.

Using this data, the Companies will report the percentage of customers in each of these categories on the Pilot circuits. This analysis will support a high-level estimate of how the Pilot helps mitigate the impact of EFT disruptions on vulnerable and critical customer segments.

It is important to note that the Companies do not maintain income information for any customers, nor do the Companies have any indication of whether kupuna or elderly individuals reside at a specific account. It is reasonable to assume that a percentage of kupuna receive service through each distribution circuit, however, the Companies are not able to quantify specific percentages.

The Hawaiian Electric Companies appreciate the Commission’s approval of the Pilot Notice in less than the 45-day review period specified in Order No. 38663 and look forward to implementing this Pilot.

Sincerely,

/s/ Rick Pinkerton

Rick Pinkerton
Director, Asset Planning & Strategy

⁵ See <https://www.hawaiianelectric.com/billing-and-payment/payment-assistance/low-income-programs/h-heap>.

⁶ See <https://www.hawaiianelectric.com/billing-and-payment/payment-assistance/special-medical-needs>.

⁷ See <https://www.hawaiianelectric.com/billing-and-payment/payment-assistance/life-support>.

From: noreply@salesforce.com on behalf of PUC CDMS <hpuc@notify.hawaii.gov>
Sent: Tuesday, October 21, 2025 2:22 PM
To: Mounthongdy, Christine
Subject: Hawaii PUC CDMS eSERVICES - E-Filing F-332867 FILED Confirmation

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E-Filing Filed Confirmation

Aloha Christine Mounthongdy,

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E-Filing Confirmation Number: F-332867

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