



November 17, 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' Responses to PUC-HECO-EVTariffPilot-IRs 01-03

The Hawaiian Electric Companies¹ enclose for filing the Companies' responses to PUC-HECO-EVTariffPilot-IRs 01-03, which the Commission issued in this proceeding on November 10, 2025.

Sincerely,

/s/ Peter C. Young

Peter C. Young
Director, Regulatory Rate Proceedings

Enclosures

c: Division of Consumer Advocacy

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

PUC-HECO-EVTariffPilot-IR-01

Reference: Letter From: A. Marceau To: Commission Re: Docket No. 2022-0212 – Innovative Pilot Process; Proposed Modification to Schedule EV-J and EV-P Tariff Pilot Terms and Conditions, filed on October 28, 2025 (“Companies’ Request”) at 2-3.

The Companies state the following:

Charging stations are often completed and open for public use long before building permit closure. Permit closure is often unrelated to charging stations’ commercial operation and may be delayed due to administrative requirements or outstanding corrections elsewhere on a project site.

The requirement for a closed building permit is duplicative of existing utility processes used to verify that permits are issued for utility services, where required, and that Authorities Having Jurisdiction (“AHJ”) have inspected installations for code conformity. Prior to energizing a new electrical service, the Companies require a meter inspection release from the AHJ as confirmation that they have inspected the metering infrastructure and deemed it acceptable to energize. The Companies’ position is that a meter inspection release from the AHJ is sufficient assurance that the customer has taken the appropriate steps to obtain the necessary AHJ approvals to allow for service, and that the requirement for a closed building permit(s) is unnecessary for Pilot enrollment.

- (a) Please discuss the existing utility processes in greater detail, including whether a charging station that has passed AHJ inspection can become energized prior to closure of the building permit.
- (b) Please discuss in detail the process for obtaining and closing a building permit, including the average permit approval timeline and the average timeline for obtaining a meter inspection release.
- (c) Please discuss in detail what the AHJ meter inspection release specifically covers in each of the Companies’ service territories, and how the Companies are ensuring that all safety and compliance aspects previously covered by the closed permit requirement are adequately addressed solely by the meter release, particularly given the variety of charging types covered by the Pilot tariffs.

Hawaiian Electric Companies’ Response:

- (a) To accurately measure and bill customers for their electricity consumption, the Companies must install a utility meter prior to energizing a new or upgraded electrical service. Once the customer has installed all infrastructure to support the meter (i.e.,

meter base/metering switchboard, enclosures, etc.) and downstream electrical infrastructure, they may request AHJ inspection to certify safety and code-compliance under their electrical permit. Upon successfully passing all required AHJ electrical inspections, the AHJ will send the Companies notice of meter inspection release directly via email. This meter inspection release certifies to the Companies that the AHJ has inspected all infrastructure under their jurisdiction and that it is safe to energize.

The AHJ will not issue a meter inspection release unless the customer has obtained all electrical permits applicable to their project. Since utility meter installation is a prerequisite to energizing an electrical service, the meter inspection release acts as a proxy for confirmation that the customer has obtained all required electrical permits for the scope of work.

Additionally, the Companies confirm that an electrical permit has been issued for a new or upgraded electrical service, if required, before initiating utility infrastructure installation (transformer, conductors, etc.).

The Companies require meter inspection release prior to energizing an electrical service, but do not require building permit closure. Thus, the Companies may energize an electrical service following receipt of meter inspection release, even if the building permit has not been closed.

- (b) The detailed processes for building permit issuance and closure and meter inspection release are administered by the AHJ and are managed directly between the AHJ and the customer/building permit applicant. Therefore, the Companies are not typically involved in these processes for Pilot participants, and do not have insight into process details for

obtaining and closing a building permit, nor average permit approval timelines and average timelines for obtaining a meter inspection release.

The Companies note, however, that during Pilot administration, the Companies monitor permit closure and have become aware of customer delays in obtaining final closed permits while monitoring Pilot applicant enrollment progress. While seeking to enroll customers in the Pilot, the Companies were unable to complete Pilot enrollment due to customers having not yet obtained their final closed building permit. In other words, following energization, the Companies monitor potential Pilot participants' permit closure status to confirm Pilot enrollment eligibility. Importantly, data collected by the Companies for potential Pilot participants shows an average timeline of 135 days from energization to permit closure, which represents the delay in Pilot enrollment experienced by customers resulting from the Pilot's closed permit enrollment criterion.

As noted in the response to PUC-HECO-EVTariffPilot-IR-03, the Companies' request to remove the closed building permit as a condition of Pilot enrollment would allow enrollment in the Pilot upon energization as opposed to waiting for permit closure, and therefore focuses on eliminating the delay between energization and permit closure.

- (c) As discussed in the Companies' response to subpart (a) above, the AHJ's meter inspection release confirms that the AHJ has inspected all electrical infrastructure under their jurisdiction, certifying that all electrical infrastructure meets all applicable electrical codes and is safe for the Companies to energize. Since the AHJ will not issue meter inspection release without the required permits in place, the meter inspection release confirms, by proxy, that the customer has obtained any required permits for the scope of work.

While the type of EV charging infrastructure may vary, the AHJ's meter inspection release indicates to the Companies that all electrical infrastructure under the AHJ's jurisdiction has been installed to code and is safe to energize irrespective of the equipment and infrastructure that is installed on the customer's side of the meter.

As the electric utility, the Companies' purview is limited to the electrical infrastructure serving the project. Any other safety or compliance verification enforced through building permit closure, such as surface restoration, civil infrastructure, landscaping, completion of administrative documentation, etc., is outside of the Companies' purview.

By requiring the AHJ's meter inspection release prior to energizing, the Companies are assured that the AHJ has verified that all electrical infrastructure under their jurisdiction has been inspected and the appropriate safety verifications have been completed. Therefore, the meter inspection release confirms that the project is code compliant and is safe for the Companies to energize.

PUC-HECO-EVTariffPilot-IR-02

Reference: 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' Annual Pilot Update Report, filed on March 24, 2025, Attachment 3 at 22; Companies Request at 2.

In the Annual Pilot Update Report, the Companies state:

From a customer experience standpoint, Pilot enrollees strongly agreed that the conditions of enrollment were easy to understand, and that the enrollment process was clear, easy, and efficient, as seen in Figure 16 and Figure 17. These scores showed marked improvement over the 2023 average score of 2.7 for both questions.

Figure 16. Average Enrollee Response Score re: Enrollment Requirement Comprehension

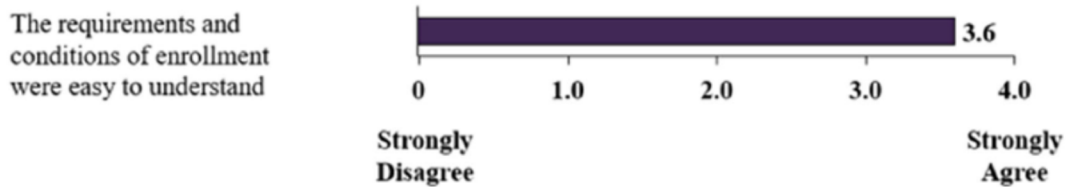
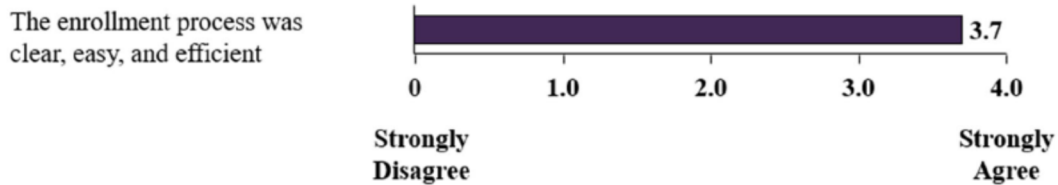


Figure 17. Average Enrollee Response Score re: Enrollment Process



The Companies' Request states:

Obtaining a final closed building permit (i.e., permit closure) has delayed Pilot enrollment for eight (8) out of the ten (10) enrolled permitted EV charging installations, with an ongoing delay of seventeen (17) months for one customer awaiting enrollment. In this time, the customer pending enrollment could have saved over \$42,000 in electricity costs but remains ineligible to enroll until their building permit is closed despite meeting all other eligibility requirements. Furthermore, requiring a closed building permit as a condition of enrollment eligibility adds administrative burden to customers and to the Companies to monitor permit status, gather permit-related information, and submit exceptional rate change requests. These requirements and the associated delays in enrollment negatively impact customers' experience with the Pilot.

- (a) Given Pilot enrollees' responses to the 2024 and 2023 surveys indicating they strongly agree or somewhat agree that the enrollment process was clear, easy, and efficient,

- combined with the Companies' statement that obtaining permit closure has delayed Pilot enrollment for 8 in 10 enrolled permitted EV charging installations, please discuss why the Companies' believe customer satisfaction with Pilot enrollment improved in 2024 compared to 2023 and provide any supporting analysis to support such position.
- (b) Please discuss whether the Companies have established any internal targets for customer satisfaction pertaining to Pilot enrollment. If not, please discuss why not.
 - (c) Please clarify whether applicants subject to pending enrollment are surveyed for the Annual Pilot Update Report.
 - (d) Please discuss whether the customer who the Companies' assert "could have saved over \$42,000 in electricity costs" has communicated to the Companies their dissatisfaction with the closed building permit enrollment criterium. If so, please provide copies of any such communication to and from the customer on this matter.

Hawaiian Electric Companies' Response:

- (a) Participating customers' responses to the annual survey in aggregate indicate that they strongly agree or somewhat agree that the enrollment process was clear, easy, and efficient, however these survey questions refer to the enrollment experience in general, and not specifically enrollment delays due to pending permit closure. The 2023 survey captured feedback from the first three (3) accounts to enroll in the EV Tariff Pilot Rates. At the time of their enrollment, the Companies were progressively defining and refining Pilot enrollment processes to offer a consistent and streamlined customer experience. At the time of the 2024 survey, there were an additional four (4) new participants for a total of seven (7) accounts enrolled in the Pilot. The Companies believe that the 2024 survey's improved customer satisfaction scores are likely due to enrollment process improvements implemented over the course of the Pilot, including clear, early communication of enrollment expectations; regular, consistent touchpoints prompting enrollment documentation submission; and timely enrollment once all pre-requisite criteria are satisfied.

- (b) The Companies have not established any internal targets for customer satisfaction pertaining to Pilot enrollment. The Companies did not set a target because the EV Tariff Pilot rates are a new initiative (with account enrollment beginning in 2023) and the primary purposes of the Pilot are to encourage EV charging behavior that benefits the grid, collect EV charging data on customer response to Pilot rates, and gain a deeper understanding of how EV charging rates suit the various needs of commercial customers. The Companies nevertheless endeavor to offer an excellent customer experience by responding promptly to customers' inquiries, offering clear and consistent customer communication, and seeking ways to streamline the enrollment process including ways to remove administrative barriers to enrollment. The Companies use customer experience survey data collected to inform an assessment of lessons learned, areas for potential improvement, and points of success in the Annual Pilot Update.
- (c) Customers actively enrolled in the EV Tariff Pilot Rates are surveyed for the Annual Pilot Update Report. Customers pending enrollment are not surveyed, as they are not yet enrolled in the EV Tariff Pilot Rates and are not yet considered to be Pilot participants.
- (d) The customer has not explicitly communicated their dissatisfaction with the closed building permit requirement criterium. They have nonetheless contacted the Companies several times requesting Pilot enrollment updates while their permit was pending closure.

PUC-HECO-EVTariffPilot-IR-03

Reference: 295, Session Laws of Hawaii 2025 (“Act 295”).

Among other things, Act 295, which takes effect July 1, 2026, allows expedited permitting for new dwelling units if no action is taken by the permitting department within 60 days of application receipt.

Please discuss whether Act 295 has any impact on the timeline for individuals to obtain a closed building permit.

Hawaiian Electric Companies’ Response:

The Companies do not expect Act 295 to have an impact on the relevant timeline for individuals to close their building permits. Permit closure refers to the process of officially ending the permit’s validity once all Authorities Having Jurisdiction (“AHJ”) requirements are met, and work is completed, inspected and approved by the AHJ.

Act 295 provides a pathway for expedited permit approval and certificate of occupancy for qualifying single-family and multi-family housing projects, subject to certain conditions, but it does not address permit closure. Therefore, the Companies do not expect it to expedite permit closure.

Act 295 also has limited relevance to Pilot-eligible projects. Act 295 solely applies to single-family and multi-family housing projects. Single-family homes are not eligible for Pilot enrollment, and only separately-metered EV charging electrical services within multi-family housing projects would be Pilot-eligible. Act 295 would not have applied to any of the Pilot’s current participants.

To clarify, the Companies’ request to remove the closed building permit as a condition of Pilot enrollment would allow enrollment in the Pilot upon energization as opposed to waiting for permit closure, and therefore focuses on eliminating the delay between energization and permit

closure. To further clarify, energization may occur after the AHJ provides the Companies with their meter inspection release and the Companies have installed any required utility infrastructure (i.e., transformer, primary conductors, meter, etc.). Act 295 does not address the delay between energization and permit closure.