

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAI‘I

| | | |
|---|---|----------------------|
| In the Matter of the |) | |
| |) | |
| PUBLIC UTILITIES COMMISSION |) | DOCKET NO. 2018-0165 |
| |) | |
| Instituting a Proceeding to Investigate |) | |
| Integrated Grid Planning |) | |
| |) | |
| |) | |
| |) | |
| _____ |) | |

COUNTY OF HAWAI‘I’S COMMENTS

Re: Input and Assumptions Filing under the Integrated Grid Planning (IGP) docket

I. Introduction

The County of Hawai‘i (COUNTY) appreciates the opportunity to provide feedback on the Hawaiian Electric Companies (Companies) upcoming October 1, 2021 Input and Assumptions filing under the IGP docket.

COUNTY appreciates the significant work that has gone into creating the Companies’ draft *Grid Needs Assessment and Solutions and Solution Evaluation Methodology* and the Companies’ engagement with experts through the Stakeholder Technical Working Group on the development of this report and the upcoming Input and Assumptions Filing. In response to Order No. 37927 Public Utilities Commission’s question 11, COUNTY provides the following questions that we request be answered in advance of the October 1st Input and Assumptions filing.

- 1) The draft *Grid Needs Assessment and Solutions and Solution Evaluation Methodology* mentions the use of curtailed power for virtual inertia in the system, but does not go into much greater detail about this curtailment assumption in the modelling work that the Companies are doing to support this report. Where do forecasts for curtailed power fit into the Companies' current input and assumptions for the IGP?
- 2) Has HECO considered implementing any technologies to use or store curtailed renewable electricity (from existing or planned new generation) so it is not wasted? If so, what input and assumptions have been made about the types of technologies which could be employed to use curtailed renewable electricity?
- 3) For the Phase 1 and 2 PV+BESS solar farms, what is the projected wasted PV electricity production once the battery has been fully charged daily/monthly annually?

COUNTY looks forward to receiving the Companies' responses to these questions.

DATED: Hilo, Hawai'i, September 10, 2021.

/s/ Angelic M.H. Hall
ANGELIC M.H. HALL
Deputy Corporation Counsel
Attorney for COUNTY OF HAWAI'I

CERTIFICATE OF SERVICE

I hereby certify that the foregoing COUNTY OF HAWAII'S COMMENTS was duly served upon the following parties, via U.S. mail and/or electronic service on September 10, 2021, addressed as follows:

DEAN NISHINA
EXECUTIVE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
DIVISION OF CONSUMER ADVOCACY
P.O. Box 541
Honolulu, HI 96809
Email: dean.k.nishina@dcca.hawaii.gov

DEAN MATSUURA
DIRECTOR, REGULATORY RATE PROCEEDINGS
HAWAIIAN ELECTRIC COMPANY, INC.
P.O. Box 2750
Honolulu, HI 96840-0001
Email: dean.matsuura@hawaiianelectric.com

ISAAC H. MORIWAKE
KYLIE W. WAGER CRUZ
EARTHJUSTICE
850 Richards Street, Suite 400
Honolulu, HI 96813
Attorneys for BLUE PLANET FOUNDATION
Email: imoriwake@earthjustice.org
Email: kwager@earthjustice.org

MELISSA MIYASHIRO
CHIEF OF STAFF
BLUE PLANET FOUNDATION
55 Merchant Street, 17th Floor
Honolulu, HI 96813
Email: melissa@blueplanetfoundation.org

WILLIAM J. ROLSTON
DIRECTOR
ENERGY ISLAND
73-4104 Lapaau Place
Kailua Kona, HI 96740-8424
Email: willenergyisland@gmail.com

BEREN ARGETSINGER
TIM LINDL
KEYES & FOX LLP
P.O. Box 166
Burdett, NY 14818
Attorneys for HAWAII PV COALITION
Email: bargetsinger@keyesfox.com
Email: tlindl@keyesfox.com

ROBERT MOULD
HAWAII SOLAR ENERGY ASSOCIATION
P.O. Box 37070
Honolulu, HI 96817
Email: rmould@hsea.org

HENRY Q CURTIS
VICE PRESIDENT FOR CONSUMER AFFAIRS
LIFE OF THE LAND
P.O. BOX 37158
Honolulu, HI 96837
Email: henry.lifeoftheland@gmail.com

DOUGLAS A. CODIGA, ESQ.
MARK F. ITO, ESQ
SCHLACK ITO
A LIMITED LIABILITY LAW COMPANY
Topa Financial Center
745 Fort Street, Suite 1500
Honolulu, HI 96813
Attorney for ULUPONO INITIATIVE LLC
Email: dcodiga@schlackito.com
Email: mito@schlackito.com

ERIK KVAM
PRESIDENT
RENEWABLE ENERGY ACTION COALITION OF HAWAI'I, INC.
4188-4 Keanu Street
Honolulu, Hawai'i 96816
Email: Erik.Kvam@REACHawaii.org

GERALD A. SUMIDA
ARSIMA A. MULLER
CARLSMITH BALL LLP
ASB TOWER, SUITE 2100
1001 Bishop Street
Honolulu, Hi 96813
Email: gsumida@carlsmith.com
amuller@carlsmith.com

DATED: Hilo, Hawai'i, September 10, 2021.

/s/ Angelic M.H. Hall
ANGELIC M.H. HALL
Deputy Corporation Counsel
Attorney for COUNTY OF HAWAI'I