

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

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

ORDER NO. 38606

ADDRESSING THE HAWAIIAN ELECTRIC COMPANIES'
MOTION FOR CLARIFICATION AND/OR PARTIAL
RECONSIDERATION OF DECISION AND ORDER NO. 38482

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RECONSIDERATION OF DECISION AND ORDER NO. 38482

By this Order, the Public Utilities Commission ("Commission") denies in part and grants in part the Motion for Clarification and/or Partial Reconsideration of Decision and Order No. 38482¹, filed by HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC LIGHT COMPANY, INC., and MAUI ELECTRIC COMPANY, LIMITED (collectively "Hawaiian Electric" or "Companies"), as set forth herein.²

¹"Hawaiian Electric Companies' Motion for Clarification and/or Partial Reconsideration of Decision and Order No. 38482; Memorandum in Support of Motion; Exhibit 1; and Certificate of Service," filed on July 11, 2022 ("Motion for Clarification"). Because the Motion for Clarification has separate pagination from the Memorandum in Support of the Motion for Clarification, this Order will reference them separately.

²The Parties to this proceeding are Hawaiian Electric, the DIVISION OF CONSUMER ADVOCACY, an ex officio party,

I.

MOTION

On July 12, 2018, the Commission opened this docket to investigate the integrated grid planning ("IGP") process.³

On June 30, 2022, the Commission issued Decision and Order No. 38482⁴ which approved, with modifications, Hawaiian Electric's Grid Needs Assessment ("GNA") and Solution Evaluation Methodology.⁵ Among other things, Order No. 38482 required Hawaiian Electric to collaborate with the technical advisory panel ("TAP") and the Parties to create a resource adequacy workplan ("Resource Adequacy Workplan") that explains how it will develop resource adequacy criteria based on effective load carrying capability ("ELCC"), and file the Resource Adequacy Workplan with the Commission by August 31, 2022.⁶

and the Intervenor: (1) LIFE OF THE LAND; (2) ENERGY ISLAND; (3) COUNTY OF HAWAII; (4) HAWAII PV COALITION; (5) HAWAII SOLAR ENERGY ASSOCIATION; (6) PROGRESSION HAWAII OFFSHORE WIND, LLC; (7) ULUPONO INITIATIVE, LLC; and (8) BLUE PLANET FOUNDATION.

³See Order No. 35569, "Instituting a Proceeding to Investigate Integrated Grid Planning," filed on July 12, 2018.

⁴Order No. 38482, "Approving With Modifications Hawaiian Electric's Grid Needs Assessment," filed on June 30, 2022 ("Order No. 38482").

⁵"The Hawaiian Electric Companies' Grid Needs Assessment Methodology Review Point, Books 1-2," filed on November 5, 2021 ("Grid Needs Assessment Methodology").

⁶See Order No. 38482 at 63.

On July 11, 2022, Hawaiian Electric filed its Motion for Clarification, seeking reconsideration and/or clarification of Order No. 38482 in four areas, primarily related to the Resource Adequacy Workplan.

First, Hawaiian Electric "requests partial reconsideration of Order [No.] 38482 to allow the first IGP cycle to complete, at which time review of the current methodology and potential alternatives would be more appropriate."⁷ Hawaiian Electric requests, in the alternative, that "if the Commission is not inclined to wait until the end of the first IGP cycle, the Companies request clarification and/or partial reconsideration that the [Resource Adequacy Workplan] required by Order [No.] 38482 be focused on evaluating *whether ELCC is appropriate* rather than being the pre-determined outcome."⁸ In support of its request, Hawaiian Electric cites the TAP's statement that "[w]hile ELCC is widely recommended today, resource adequacy experts in California and on the TAP are starting to move away from it for very high renewable scenarios, and the TAP does not see it as the obvious best choice."⁹ Hawaiian Electric argues that its current capacity accreditation methodology,

⁷Motion for Clarification at 2.

⁸Memorandum in Support of Motion for Clarification at 9, n.15 (emphasis in original).

⁹Motion for Clarification at 2 (citation omitted).

which is based on energy reserve margin ("ERM") and hourly dependable capacity ("HDC"), appears to meet the Commission's three stated goals of transparency, interactivity between resources, and no unfair bias towards firm thermal capacity.¹⁰

Second, Hawaiian Electric states that because it needs more time and resources, "and given competing needs (some of which rely upon the current GNA methodology), the Companies request that the Commission reconsider the immediate imposition of restrictions on the use of the current GNA methodology in other proceedings without prior Commission approval."¹¹ Hawaiian Electric further states that "[i]f the Commission is steadfast on its preference to move toward an ELCC methodology, the Companies require clarification as to how this restriction can be imposed without undue burden and delay to procurements and programs that will rely upon IGP analysis."¹²

Third, Hawaiian Electric requests clarification on the number of samples it must use in its stochastic assessment.¹³

¹⁰See Memorandum in Support of Motion for Clarification at 11-16.

¹¹Memorandum in Support of Motion for Clarification at 3.

¹²Memorandum in Support of Motion for Clarification at 3.

¹³See Memorandum in Support of Motion for Clarification at 21.

Fourth, Hawaiian Electric requests an extension of the deadline to file the Resource Adequacy Workplan from August 31, 2022, to September 14, 2022.¹⁴

II.

DISCUSSION

A.

Legal Standard

HAR § 16-601-137 requires motions for reconsideration to state the grounds on which the movant considers the decision or order to be unreasonable, unlawful, or erroneous. The Hawaii Supreme Court explains that “[a] motion for reconsideration is limited to allowing the parties to present new evidence and/or arguments that could not have been presented during trial and is not a device to relitigate old matters or to raise arguments or evidence that could and should have been brought during the earlier proceeding.”¹⁵ If a movant seeks to introduce new evidence in a motion for reconsideration, HAR § 16-601-139 requires that any such new evidence “not be cumulative and be

¹⁴See Memorandum in Support of Motion for Clarification at 23. The Commission granted this request in Order No. 38589, “Granting the Hawaiian Electric Companies’ Request for an Enlargement of Time,” filed on August 30, 2022.

¹⁵Gailliard v. Rawsthorne, 150 Hawaii 169, 180 (2021) (citation and quotations omitted).

accompanied by an explanation as to why such evidence was not previously adduced.”¹⁶ As discussed in detail below, insofar as the Motion for Clarification seeks reconsideration of Order No. 38482, it fails to meet this standard.

B.

Summary

As the Commission stated in Order No. 38482, “the Commission, like the TAP, believes that it is appropriate to explore improvements to Hawaiian Electric’s resource adequacy modeling.”¹⁷ Order No. 38482 simply requires Hawaiian Electric to begin that process by developing the Resource Adequacy Workplan with a few initial components.¹⁸ Nothing in the Motion for Clarification changes the Commission’s belief that Hawaiian Electric should explore improvements to its HDC + ERM approach, and that the Resource Adequacy Workplan is the proper first step of that exploration.

As the Commission stated in Order No. 38482, “ELCC is a well-established metric suitable for comparing the contribution toward resource adequacy provided by a wide range

¹⁶HAR § 16-601-139.

¹⁷Order No. 38482 at 27.

¹⁸See Order No. 38482 at 28-29.

of resource types, including renewable resources, energy storage, and dispatchable thermal subject to forced and maintenance outages.”¹⁹ The Commission explained how ELCC is superior to HDC because “ELCC assigns capacity credits to variable energy resources based on their actual contribution to resource adequacy revealed by stochastic reliability analysis[,]” while HDC “derates solar and wind capacity by an arbitrary 1- or 2-sigma deduction[.]”²⁰ The Commission further explained that “[u]nlike HDC, ELCC captures both the synergistic and antagonistic interactions between resources in a portfolio.”²¹ The Commission also found that ELCC can be more transparent than Hawaiian Electric’s proposed HDC + ERM methodology.²²

Although the Commission approved Hawaiian Electric’s modified HDC + ERM for the first IGP cycle, the Commission stated that:

the Commission would like to see methodologies that: (1) can be transparently derived from other models, such as PLEXOS, to minimize or even eliminate opaque planning judgments; (2) incorporate the interactive effects between resource types in determining their contributions to system reliability; and (3) use realistic assumptions about variable generators’ availability, so as to not unfairly bias resource

¹⁹Order No. 38482 at 23-24.

²⁰Order No. 38482 at 24.

²¹Order No. 38482 at 24.

²²See Order No. 38482 at 24-25.

selection in RESOLVE towards firm thermal capacity. These characteristics will become more important as the State adds more variable renewable energy resources and storage.²³

The Motion for Clarification lacks convincing evidence that Hawaiian Electric's proposed HDC + ERM criteria can satisfy these criteria better than ELCC could. Even if viewed charitably, the Motion for Clarification is little more than Hawaiian Electric's plea to use HDC + ERM indefinitely, notwithstanding the Commission's concerns. Nevertheless, the Commission is open to demonstrably better alternatives that also meet these criteria. It is critical for Hawaiian Electric to begin this work now, both because of the time it will take,²⁴ and because capacity accreditation is important in IGP and in other proceedings supported by IGP. The Commission addresses Hawaiian Electric's areas of concern, in detail, as follows.

C.

Implementing ELCC

Hawaiian Electric "requests partial reconsideration of Order 38482 to allow the first IGP cycle to complete, at which time review of the current methodology and potential alternatives

²³Order No. 38482 at 27-28.

²⁴See Memorandum in Support of Motion for Clarification at 20-21.

would be more appropriate.”²⁵ Hawaiian Electric requests, in the alternative, that “if the Commission is not inclined to wait until the end of the first IGP cycle, the Companies request clarification and/or partial reconsideration that the [Resource Adequacy Workplan] required by Order 38482 be focused on evaluating *whether ELCC is appropriate* rather than being the pre-determined outcome.”²⁶

As already stated in Order No. 38482, “the Commission, like the TAP, believes it is appropriate to explore improvements to Hawaiian Electric’s resource adequacy modeling.”²⁷ This is precisely what the Commission directed Hawaiian Electric to do with the Resource Adequacy Workplan.²⁸ For the reasons already stated in Order No. 38482, the Commission believes that ELCC could be an appropriate capacity accreditation metric to use in future rounds of IGP.²⁹ Essentially, the Commission believes that ELCC, if developed as part of a transparent and informed stakeholder process and implemented using the proper methodology, could do a better job than the HDC + ERM method that Hawaiian Electric

²⁵Motion for Clarification at 2.

²⁶Memorandum in Support of Motion for Clarification at 9, n.15 (emphasis in original).

²⁷Order No. 38482 at 27.

²⁸See Order No. 38482 at 28-29.

²⁹See Order No. 38482 at 19-29.

proposed and the Commission approved for the first round of IGP. The Commission is open to the idea that there may be other better metrics or more appropriate heuristics. The Resource Adequacy Workplan process will allow Hawaiian Electric to begin exploring ELCC so that it will be prepared to use ELCC in the next round of IGP. If this process shows that ELCC is not workable, then Hawaiian Electric will be better prepared to have appropriate alternatives available for the next round of IGP.

Hawaiian Electric's request for partial reconsideration of Order No. 38482 does not present new evidence or germane arguments that it is necessary to wait for the next round of IGP to begin considering ELCC. Therefore, the Commission denies Hawaiian Electric's request for partial reconsideration of Order No. 38482 to allow the first IGP cycle to complete before beginning the Resource Adequacy Workplan. Furthermore, the Commission denies Hawaiian Electric's request that the Resource Adequacy Workplan be focused on evaluating whether ELCC is appropriate.

The Resource Adequacy Workplan is intended to: (1) increase the Commission's understanding of the timeline, challenges, and opportunities of adopting ELCC; and (2) inform a future decision on the resource adequacy criteria to be used in future rounds of IGP. Hawaiian Electric is free to propose alternative resource adequacy criteria, in addition

to ELCC, in the Resource Adequacy Workplan so long as it can explain: (1) how the alternative criteria meet the Commission's requirements of transparency, interactivity, and no bias towards firm thermal generation; and (2) why the alternative criteria are preferable to ELCC.

D.

ELCC In Other Jurisdictions³⁰

Hawaiian Electric cites the TAP's statement that "[w]hile ELCC is widely recommended today, resource adequacy experts in California and on the TAP are starting to move away from it for very high renewable scenarios, and the TAP does not see it as the obvious best choice."³¹ The Commission is aware that California is exploring modifications to ELCC to improve its planning processes. But it is not at all clear that California is abandoning ELCC. Although California is proposing to move away from ELCC towards a "slice-of-day" approach for its short-term resource adequacy market, California still appears to

³⁰The Commission may take official notice of facts that are not already in the record. See HAR § 16-601-48. Pursuant to HAR § 16-601-48, the Commission takes official notice of the reports and information cited below, insofar as they are not already in the record.

³¹Motion for Clarification at 2 (citation omitted).

be using ELCC for long-term planning and procurement.³² Moreover, evidence from outside California strongly suggests that ELCC is appropriate for grids with high renewable penetrations.³³ Many other jurisdictions and independent system operators are moving towards adopting ELCC for capacity accreditation in their resource adequacy proceedings.³⁴ The Commission envisions the Resource Adequacy Workplan process as a way to similarly improve

³²See Matt Barmack, Observations on California's Accreditation Approach, Calpine (November 22, 2021), at 9, available at: <https://www.iso-ne.com/static-assets/documents/2021/11/20211122-tech-info-session.pdf>.

³³See, e.g., Nick Schlag, Zach Ming, Arne Olson, Lakshmi Alagappan, Ben Carron, Kevin Steinberger, and Huai Jiang, Capacity and Reliability Planning in the Era of Decarbonization, Energy+Environmental Economics (August 2020), at 1, available at: <https://www.ethree.com/wp-content/uploads/2020/08/E3-Practical-Application-of-ELCC.pdf>; and Mark Specht, ELCC Explained: the Critical Renewable Energy Concept You've Never Heard of, available at: <https://blog.ucsus.org/mark-specht/elcc-explained-the-critical-renewable-energy-concept-youve-never-heard-of/>.

³⁴See Resource Adequacy in the Desert Southwest, Energy+Environmental Economics, at 28, Table 2-3, available at: https://www.ethree.com/wp-content/uploads/2022/02/E3_SW_Resource_Adequacy_Final_Report_FIN_AL.pdf. The entities using ELCC for resource adequacy include utilities in Arizona, New Mexico, Idaho, Nevada, Oregon, Colorado, and Washington, and independent system operators and regional transmission operators: ISO-NE, MISO, NYISO, PJM, SPP, and WRAP. See also Resource Capacity Accreditation in the Forward Capacity Market Key Project, available at: <https://www.iso-ne.com/committees/key-projects/resource-capacity-accreditation-in-the-fcm>.

Hawaii's planning processes by preparing Hawaiian Electric to have appropriate alternatives to HDC + ERM for the next round of IGP.

E.

Ongoing Procurements and Programs

Hawaiian Electric states that "[d]ue to the need for additional time and resources, and given competing needs (some of which rely upon the current GNA methodology), the Companies request that the Commission reconsider the immediate imposition of restrictions on the use of the current GNA methodology in other proceedings without prior Commission approval."³⁵ Hawaiian Electric states that "[i]f the Commission is steadfast on its preference to move toward an ELCC methodology, the Companies require clarification as to how this restriction can be imposed without undue burden and delay to procurements and programs that will rely upon IGP analysis."³⁶

Nothing in Order No. 38482 is intended to delay any ongoing procurements or other applications. The Commission's approval to use an HDC + ERM capacity accreditation methodology in the first round of IGP only does not mean it is forbidden elsewhere. It simply means that Hawaiian Electric must request

³⁵Memorandum in Support of Motion for Clarification at 3.

³⁶Memorandum in Support of Motion for Clarification at 3.

approval to use it elsewhere, and the Commission will review the materials pertinent to that request. To eliminate any remaining confusion, Order No. 38482 does not require Hawaiian Electric to implement ELCC in the ongoing Stage 3 procurements, which are the subject of Docket No. 2017-0352. Hawaiian Electric may use its HDC + ERM methodology in Docket No. 2017-0352. If Hawaiian Electric wants to use its HDC + ERM methodology anywhere other than the first round of IGP and Docket No. 2017-0352, it must request Commission approval at an appropriate time, such as when it files an application, and explain why using HDC + ERM is appropriate. If Hawaiian Electric anticipates filing an application that will rely on HDC + ERM, it may request permission before it files the application, at its discretion.

F.

Transparency, Interactivity, and Bias

Hawaiian Electric argues that its current HDC + ERM capacity accreditation methodology meets the Commission's three stated goals of transparency, interactivity between resources,

and no unfair bias towards firm thermal capacity.³⁷ The Commission disagrees and addresses each goal in turn.

Transparency. Hawaiian Electric states that 1- and 2-sigma reductions for solar and wind resources are “not arbitrary” and “result in probabilities that are comparable to firm unit unplanned outages.”³⁸ It is not clear why Hawaiian Electric chose probabilities associated with firm unit unplanned outages to justify solar and wind HDCs. Although it is true that the 80th percentile HDC is based on underlying weather data,³⁹ Hawaiian Electric justifies its choice of the 80th percentile value on its agreement with the 1-sigma HDC.⁴⁰ This reductive line of reasoning does not support transparency. Although there could be transparent reasoning to better support the 80th percentile HDC, that reasoning is not apparent in the record.

The Commission understands that many design and modeling decisions and judgments must be made to produce ELCCs. But these decisions can be made openly, and in consultation with

³⁷See Memorandum in Support of Motion for Clarification at 11-16.

³⁸Memorandum in Support of Motion for Clarification at 12.

³⁹See Memorandum in Support of Motion for Clarification at 12.

⁴⁰See https://www.hawaiianelectric.com/documents/clean_energy_hawaii/integrated_grid_planning/stakeholder_engagement/technical_advisory_panel/20220120_tap_meeting_presentation_materials.pdf at 20.

stakeholders. Once these decisions are made, ELCCs will emerge directly from stochastic modeling and can be transparently vetted and discussed by stakeholders. In these ways, ELCC can be transparent in a way that Hawaiian Electric's HDC + ERM approach currently cannot.⁴¹

Interactivity. By definition, HDC does not consider the interactivity between resource types.⁴² Hawaiian Electric states that "HDC will capture synergistic and antagonistic interactions between resources in a portfolio when used as part of the ERM criteria[.]"⁴³ The Commission understands that ERM can capture interactive effects that HDC cannot, because RESOLVE considers all resources together when selecting a portfolio to meet the ERM

⁴¹See Response to PUC-HECO-IR-26 (stating "HDC for renewable and thermal plants and batteries in RESOLVE should be set at a level that reflects their contribution to adequacy as found in the resource adequacy model. This may be achievable by using expected availability de-rated by forced outage rates in the ERM calculations. Or it may be preferable to use a framework, such as an ELCC calculated in the resource adequacy model for each resource (wind, solar, batteries, thermal capacity) and a capacity target equal to peak or average demand plus ERM").

⁴²See Grid Needs Assessment Methodology, Exhibit 1 at 100. See also "Comments of Ulupono Initiative LLC on the Hawaiian Electric Companies Updated Revised Inputs and Assumptions; and Certificate of Service," filed on September 10, 2021 ("Ulupono I&A Comments") at 9-10; "Comments of Ulupono Initiative LLC on the Hawaiian Electric Companies Grid Needs Assessment Methodology and Solution Evaluation Methodology Filed November 5, 2021; and Certificate of Service," filed on December 17, 2021 ("Ulupono GNA Comments"), Attachment 1 at 25.

⁴³Memorandum in Support of Motion for Clarification at 12.

criteria, and can optimize that portfolio based on the interactive effects. But it is unclear if ERM fully captures the value of these interactive effects since utility-solar, wind, and distributed-solar availability are reduced by the HDC before RESOLVE is ever run. In other words, modeling in RESOLVE to select candidate resource portfolios that meet an ERM target does not incorporate interactive effects. But since HDC - which does not account for interactive effects in its computation - is fed into the RESOLVE model during this step, it could introduce bias such that RESOLVE does not capture the full value of the interactive effects.⁴⁴

The practical effects of this practice are unclear, but could be illuminated by using an alternative capacity accreditation method, such as ELCC. As the Commission already stated, "unlike HDC, ELCC captures both the synergistic and antagonistic interactions between resources in a portfolio."⁴⁵ Unlike Hawaiian Electric's preferred HDC + ERM approach, ELCC, as a capacity accreditation metric, avoids bias in its

⁴⁴See Ulupono I&A Comments at 9-10 (stating "[t]he contribution of an additional solar project to generation adequacy varies depending on how much other solar, wind, storage or demand response is implemented at the same time. It is simply not possible to assign a meaningful HDC to each resource.")

⁴⁵See Order No. 38482 at 24 (emphasis added).

representation of interactive effects since they are directly accounted for in its computation.

Bias Towards Firm Thermal Generation. Hawaiian Electric argues that its "current methodology does not unfairly bias resource selection in RESOLVE toward firm thermal capacity[,]” and that the Oahu GNA “proves that the ERM/HDC methodology does not bias towards firm generation[,]” because it selected “large amounts of solar paired with battery energy storage and wind resources, with minimal selection of new firm generation[.]”⁴⁶

The Commission understands that RESOLVE did not select as much firm thermal generation as it could have in the Oahu GNA, given the reliability shortfalls suggested in the stochastic reliability modeling. But these results do not prove that Hawaiian Electric’s models are unbiased towards firm thermal capacity. Without any available basis for comparison, it is impossible to determine that the Oahu GNA is free of bias towards thermal generation. A flawed methodology could provide results that do not highlight the methodology’s flaws. Using different models would allow comparisons that could reveal possible bias. This is one reason why the Commission directed Hawaiian Electric to develop the Resource Adequacy Workplan. The Commission is confident that Hawaiian Electric will work with the TAP,

⁴⁶Memorandum in Support of Motion for Clarification at 15.

the Parties, and other IGP stakeholders to develop resource adequacy methodologies that demonstrably reduce or eliminate bias.

G.

Stochastic Assessment

Hawaiian Electric requests clarification on the number of samples it must use in its stochastic assessment.⁴⁷ The Commission clarifies that Order No. 38482 endorsed Hawaiian Electric's and the TAP's proposed method to use a total sample size of 250 for the stochastic assessment of resource adequacy.⁴⁸

H.

Request for Hearing

Hawaiian Electric requests a hearing on its Motion for Clarification "[b]ecause written filings alone may not be the most effective means to allow for full comprehension of the issues

⁴⁷See Memorandum in Support of Motion for Clarification at 21.

⁴⁸See Order No. 38482 at 21. See also Letter From: M. Asano To: Commission Re: "Docket No. 2018-0165, Instituting a Proceeding to Investigate Integrated Grid Planning, May 4 and 5, 2022 TAP Presentation and Notes," filed on July 26, 2022, at 16, Slide 27, (stating "250 samples is a reasonable start for probabilistic [resource adequacy analysis].")

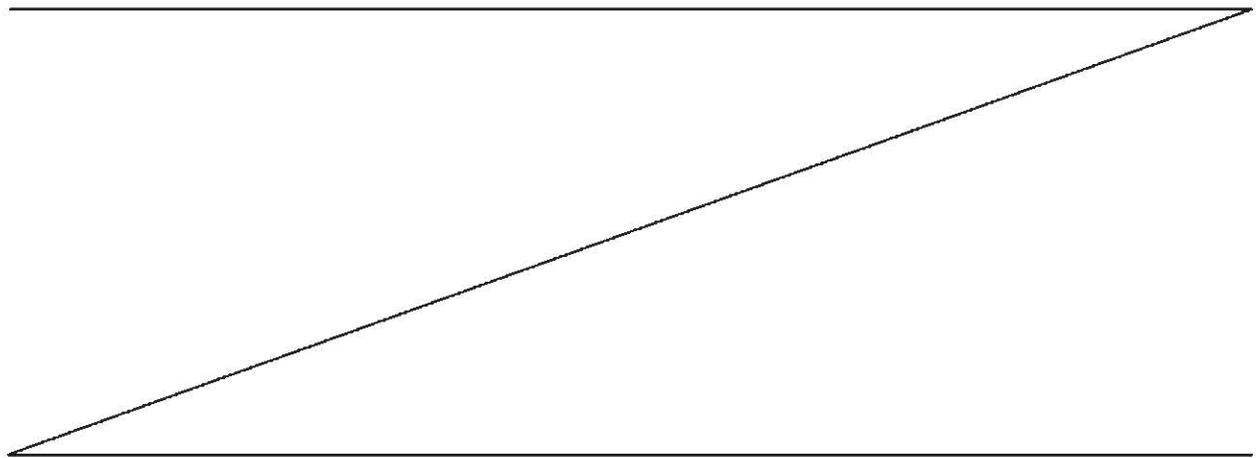
raised[.]”⁴⁹ Hawaiian Electric suggests two alternatives to a hearing, either a technical conference hosted by the Commission, or an IGP Stakeholder Technical Working Group (“STWG”) meeting with the TAP. Based on the foregoing discussion, the Commission is not inclined to hold a hearing or a technical conference on the Motion for Clarification, and therefore denies Hawaiian Electric’s request. Nevertheless, Hawaiian Electric is free to convene an STWG meeting to discuss the Resource Adequacy Workplan at any time.

III.

ORDERS

THE COMMISSION ORDERS:

1. Hawaiian Electric’s requests for reconsideration and/or clarification, set forth in its Motion for Clarification, are denied in part and granted in part, as set forth in detail herein.



⁴⁹Motion for Clarification at 2.

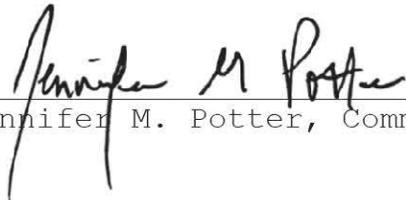
2. Hawaiian Electric's request for a hearing on the Motion for Clarification is denied.

DONE at Honolulu, Hawaii SEPTEMBER 14, 2022 .

PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By 

Leodoloff R. Asuncion, Jr., Chair

By 

Jennifer M. Potter, Commissioner

By 

Naomi U. Kuwaye, Commissioner

APPROVED AS TO FORM:



Mike S. Wallerstein
Commission Counsel

2018-0165.ljk

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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