

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

In the Matter of)	
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PUBLIC UTILITIES COMMISSION)	DOCKET NO. 2018-0165
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Instituting a Proceeding to Investigate)	
Integrated Grid Planning.)	
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**COUNTY OF HAWAI‘I’S COMMENTS ON THE HAWAIIAN ELECTRIC
COMPANIES’ INTEGRATED GRID PLANNING REPORT**

The COUNTY OF HAWAI‘I (“COUNTY”) by and through its attorneys JOSEPH K. KAMELAMELA, Corporation Counsel, and Deputy Corporation Counsel, ANGELIC M.H. HALL, hereby submits these comments in response to Commission Order 35569, allowing for comments on the Hawaiian Electric Companies’ (“HECO”) Integrated Grid Planning Report.

I. Introduction

COUNTY appreciates this opportunity to provide comment on the Hawaii Electric Companies’ Integrated Grid Planning Report, pursuant to Commission Order 35569. COUNTY has been an active stakeholder in providing feedback regarding the need for holistic electric grid planning, as it relates to the Power Supply Improvement Plan and the Commission’s review and

approval of HECO's Grid Modernization Plan, and during HECO's development of its current IGP proposal. COUNTY looks forward to continuing to work with the Commission and the utilities as they adopt what will hopefully be a nation-leading integrated grid planning process that guides the transformation of Hawai'i's grid from one that is centrally-focused and operated by a single entity, to one that is flexible, adaptable to customer-provided energy services and generation, and decreases overall energy bills for customers.

II. Comments on Commission's Process for IGP as Identified in Order 35569

- a. COUNTY supports Commission decision to retain this issue in a formal docket to provide adequate opportunity for public involvement and Commission supervision.¹

As the Commission stated in Order 35569, "The success of this new planning process depends on the details of implementation, which will come into sharper focus as the process proceeds."² COUNTY appreciates HECO's emphasis on an evolutionary approach to this new, highly integrated planning process. As HECO states, "this evolution will rely upon continuous improvement in the methods, analysis tools, data availability, and knowledge gained from conducting the process."³

The Commission rightly notes that HECO is leading a process from which utilities, regulators, and other stakeholders across the country can learn. By retaining this evolutionary process in a formal, public docket, participants and observers can appreciate the various iterations as the planning process changes. Participants and observers alike can learn best practices, as well as pitfalls to avoid, for similar integrated planning approaches. A sound

¹ Public Utility Commission Order 35569 at 21.

² *Id.* at 2.

³ Planning Hawai'i's Grid for Future Generations: Integrated Grid Planning Report. March 1, 2018. Page 6.

record of the assumptions, positions, and recommendations will prove invaluable as this process will be a fluid one over several years.

Additionally, the formal docket structure allows for organized and transparent engagement by stakeholders, with the Commission providing support and guidance and ensuring fairness and access. While HECO requests that this process occur outside of a formal docket, it is not clear how that would necessarily facilitate greater transparency, communication, and collaboration than when conducted within the known structure of a formal docket. The docket structure ensures meaningful public engagement efforts continue and provides public access to the data incorporated into planning iterations. Ultimately, this will benefit the public as well as HECO and will ensure the integrity of the planning process and agreements, negotiations, and decisions made therein.

- b. COUNTY supports Commission decision not to grant a waiver of Commission's procurement rules at this time.⁴

In 2006, the Commission adopted a Competitive Bidding Framework (in Decision and Order No. 23121) ("CB Framework") for HECO to follow when procuring a new generation resource or block of generation resources and in alignment with its Integrated Resource Plan. Waivers may be requested for certain projects. Additionally, the Commission may waive the CB Framework, but only

with a showing that the waiver will likely result in a lower cost supply of electricity to the utility's general body of ratepayers, increase the reliable supply of electricity to the utility's general body of ratepayers, or is otherwise in the public interest.⁵

⁴ Planning Hawai'i's Grid for Future Generations: Integrated Grid Planning Report. Page 19. *See also* Order 35569 at 20.

⁵ Docket 03-0372, Decision and Order No. 23121. Exhibit A, "Framework for Competitive Bidding." December 8, 2006. See Section II.A.4.(d).

Since the Integrated Grid Plan (“IGP”) is intended to replace the IRP, and the Commission has not discussed a replacement to the CB Framework, it follows that the CB Framework should continue to apply. HECO says “it is essential” that the PUC waive the CB Framework at this time, but it is not clear why. No rationale or explanation is provided in the report. For waivers of the Framework, there must be “a showing” that ratepayers will benefit, whether through decreased costs, increased reliability supply, or general public interest matters.

A waiver application must also adhere to the process outlined in Section II.A.4 of the CB Framework. Subsection (iii) specifically requires that a waiver request “accompany the filing of the proposed IRP for the Commission’s approval.” If HECO intended the section “Grant a waiver from the Framework for Competitive Bidding” in its IGP Report as its formal request that accompanies the filing of the IGP, then it must also be accompanied by specific evidence that the CB Framework would not be appropriate at this time.⁶

Waivers have been granted on a project basis, but only when those projects are proposed using prescribed criteria, and after there is significant evidence the projects would benefit ratepayers. In Order 31913⁷, for example, waivers were granted to three renewable energy projects that were developed as part of HECO’s “Invitation for Low Cost Renewable Energy Projects on Oahu.” The criteria for the projects required that the proposals “have a nameplate capacity greater than 5 MW and be priced below seventeen (17) cents per kilowatt-hour (“kWh”), levelized over a twenty (20) year term without the use of Hawaii state tax incentives.”

⁶ *Id.*, Section II A.4.(b) (c) and (d).

⁷ Docket 2013-0156, Decision and Order No. 31913.

HECO received 25 proposals, but only ten of those met the waiver criteria. Of those ten, five proposals⁸ with the lowest price per kWh were chosen. The waiver was granted after the project bids were submitted, and only because the bids were likely to deliver significant cost savings:

The average levelized price of the three (3) solar projects is 16.142 cents per kWh, which is approximately 28.2% lower than HECO's June 2013 on-peak avoided cost of 22.491 cents per kWh. HECO estimates that the total savings for the proposed projects will result in a \$0.29 per month reduction for a typical residential bill of 600 kWh.⁹

The request to waive the CB Framework is lacking in the critical details required by the Framework itself. As such, the Commission should continue to require adherence to the CB Framework. There should continue to be no discussion of waiver until HECO provides actual evidence that the CB Framework is not appropriate at this time, and that evidence should be provided in the request that accompanies its Report.

- c. COUNTY supports the Commission's decision to require HECO to file a work plan with additional detail on its proposed Integrated Grid Planning process.

Like the Commission, COUNTY "appreciates that [the lack of details in the IGP Report] is an inherent aspect of the early stages of a new planning process."¹⁰ Indeed, the IGP Report sets out admirable intentions for the new process, in particular the aim of expanding market opportunities by integrating market-based solutions early in the process and the intention to meaningfully involve stakeholders and ratepayers often in the process. COUNTY supports the Commission's order to provide a detailed IGP Workplan as a natural and necessary next step. Specifically, it is critical for HECO to develop the proposal for what, how, when, and to whom

⁸ Two of these voluntarily dropped out of the waiver proposal, leaving the three projects that bid outside of the CB Framework.

⁹ See Order 31913 at 5.

¹⁰ *Id.* at 27.

information will be shared throughout the IGP Process. Without this critical piece of infrastructure in place for the new IGP Process, key goals of communication and transparency could rapidly break down.

COUNTY specifically requests that HECO share the types of data inputs and outputs from the process diagram (Figure 3 on page 14) so that COUNTY and other stakeholders can more completely understand the process and provide comments. Appendix B summarizes some of this information in narrative detail, but a chart, table, or bulleted list of data would be helpful in general and inform COUNTY on when and how to provide input during the IGP Process. Similarly, COUNTY reinforces the Commission's request by asking specifically how stakeholders (Figure 4) fit into the IGP Process (Figure 6). A diagram illustrating HECO's plan to involve stakeholders would be invaluable, and further, HECO can specifically indicate what inputs and outputs are expected from Stakeholders and where/how that information fits into IGP Process blocks. Figures 3-6 do well to summarize the IGP Process in different ways, but the absence of a diagram integrating this information requires the Commission and COUNTY to make unnecessary, and potentially incorrect, inferences on how pieces of the IGP Process fit together.

- d. COUNTY supports Commission requirement that additional outreach and public workshop be conducted.

COUNTY appreciates HECO's stakeholder engagement activities that have occurred within this process to date. Outreach discussions occurred at different milestones during HECO's process, which allowed COUNTY and other stakeholders to provide meaningful input at those points. Input from COUNTY and other stakeholders were then incorporated into the Report.

COUNTY supports the Commission's directive to HECO to hold a workshop discussing the current IGP iteration with stakeholders and the general public, as another important step in the

stakeholder engagement and public outreach process. With the IGP Report formally submitted to the docket, and the Commission’s Order related to the Report, this process has reached another milestone where stakeholder engagement and public outreach would provide value. Many interested stakeholders, including COUNTY, have had time to review the plan and are ready with questions for HECO. Many members of the public, however, likely have not had the opportunity to distill the information or discuss it with others. The initial workshop was led by HECO on September 25 for the public to receive answers and to hold a discussion of elements and data to be included in the IGP Workplan, as well as a timeline of next steps for HECO and the public alike. COUNTY suggests that it could be in the public interest to have a follow-up public workshop in 2019 to allow the public to provide input as IGP progresses.

III. Comments on HECO’s Integrated Grid Planning Report

a. Working Groups Require Greater Coordination, and Working Group on Customer Equity and Bill Reduction Should Be Added

As an active Stakeholder and consistent intervenor before the Commission, COUNTY appreciates the decision by HECO to develop a robust proposal for working groups that will feed into the Integrated Grid Planning cycles. However, COUNTY recommends several key improvements to ensure fulsome input and that the working groups are addressing equity and rate reduction issues.

First, COUNTY believes that the proposed stakeholder engagement groups lack necessary interplay. Specifically, there appears to be little information sharing contemplated between the Technical Advisory Panel, the Stakeholder Council, and the Working Groups.¹¹ Each of these groups will be addressing important topics, but none of those topics exists in a hermetically sealed vessel. Each of the areas covered by the Working groups, the Technical Advisory Panel

¹¹ See IGP Report at 16.

and the Stakeholder Council affect the other, and as a result, COUNTY asserts that either a) the Technical Advisory Panel, Council and Working groups should include cross-pollination from one another to ensure communication and diverse input or b) the Working groups, Council and Technical Panel should have a regularly scheduled meeting or call, in which the activities of each are made transparent.

COUNTY is also concerned that there is potential for the most important and defining issues to be resolved by the Technical Advisory Panel, sans input from key stakeholders and the public. This should be addressed before the working groups are launched.¹² For instance, HECO makes it clear that the technical panel will be tasked with serving as a “sounding board” on its methods and tools, as well as the results of those planning methods and tools, and yet, there is no evidence that the other working groups will be privy to these discussions or be offered the opportunity to provide input or feedback. This is extremely important in the initial phase as ‘assumptions’ are being defined and metrics are formulated. In previous dockets, (i.e., DG, IRP, PSIP), technical conferences presented assumptions made by the Companies without stakeholder input. As it turned out the assumptions were wrong, resulting in delays in the process moving forward. COUNTY understands the role and importance of a technical advisor panel, but asserts that the Commission should find some means by which this very crucial panel receives proper input from other stakeholders and working groups.

HECO also appears to have already chosen the members of the Technical Advisory Panel as well as its inaugural chairperson. Without providing specific comment on the individuals selected by the Company for the Technical Advisory Panel, COUNTY suggests that the Commission should be involved in the selection of this group or at the very least, HECO should take input from stakeholders on potential membership on the panel. Moreover, the Technical

¹² *Id.* at 16-17.

Advisory Panel members as outlined by HECO, represent a select, small group and should be expanded. At a minimum, the Technical Advisory Panel should also include representatives from the Counties, if the Counties are able to nominate a qualified individual.

COUNTY strongly supports the formation of a Market Working Group, but posits that this group's mission should be more expansive. Currently, the HECO plan merely calls for the group to address barriers caused by the competitive procurement process. COUNTY agrees that the competitive procurement process should be examined by the Market Working Group, but this group should also be tasked with identifying all barriers to entry in the energy market for new energy services.¹³ Among other barriers to the sound development of energy markets in Hawaii that could be explored and identified are utility incentive alignment, access to data and information, grid access and interconnection.

Additionally, COUNTY recommends that an additional Working Group on Customer Equity and Bill Reduction be formed, to focus formally and exclusively on the question of reducing overall energy bills for Hawai'i residents and businesses. As COUNTY consistently points out, Hawai'i residents face the highest utility bills in the nation, and as such, this issue calls out for specific focus by HECO and the Commission as part of the IGP process. Additionally, many ratepayers find themselves living at or below the poverty line, leaving them at increased exposure to high energy costs. A separate working group aimed entirely at addressing equity for low-income customers of HECO is warranted.¹⁴

Figures 1 and 2 below demonstrate how COUNTY's proposed additions to the IGP process could be reflected and implemented.

¹³ *Id.* at Appendix A, at 3.

¹⁴ *Id.* at 18 and Appendix A, at 4.

Figure 1

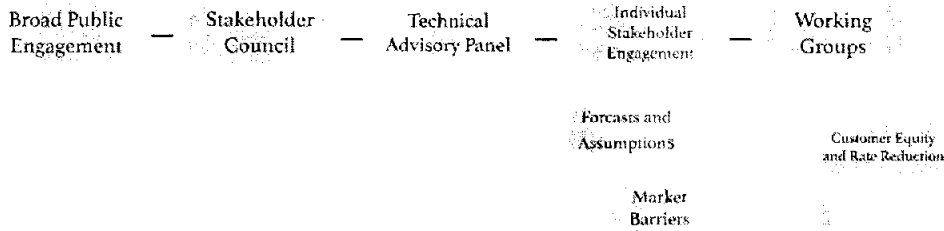
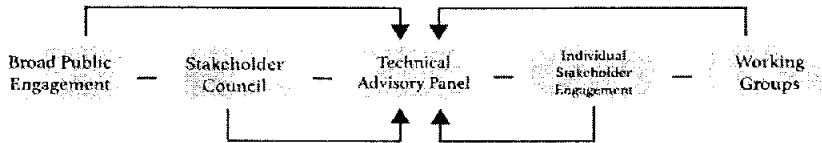


Figure 2



b. Increased Effort is Requested for Engaging and Educating the Public

In noting that ratepayers have become more active in energy dialogues in Hawai'i and around the nation, what plans do the companies have to involve, educate, and learn from the public during the IGP Process? Appendix A indicates ways to obtain interview data that can be largely driven by the scope and format of questions. COUNTY requests that the companies provide more details on surveys and the other measurement instruments indicated on Page 4 of

Appendix A. Further, can the companies develop a simple, yet illustrative, online forum with basic modeling or illustrations that more directly engages the public in understanding and examining alternatives? That form of engagement would better demonstrate HECO's commitment to "educate your consumer" and involve ratepayers in a more engaging, exploratory, and bi-directional exchange.

c. Performance Based Regulation Should Be Addressed/Incorporated Into the IGP Process

The Report fails to incorporate a reference to or description of how the Commission's adoption of Performance Based Regulation will affect or interplay with HECO's proposed Integrated Grid Planning process. Performance Based Regulation is emerging as a fundamental building block for the state's efforts to meet its far-reaching policy objectives, including achieving 100 percent Renewable Energy in a cost-effective manner and could be a key tool in holding down stranded costs, bringing down overall energy bills, and developing the state's third party energy markets. As such, COUNTY recommends that PBR proposals be integrated and coordinated with the IGP process and that HECO include a proposal for how PBR should be addressed by the various working groups identified in the Report.¹⁵

d. Additional Clarity Requested on Role(s) of Technical Advisory Panel

The IGP Plan indicates a high amount of workload for the Technical Advisory Panel, at least in relation to other stakeholders, and such work and technical study may require funding to complete. COUNTY requests that HECO indicate how such work will be funded and who the Technical Advisory Panel will specifically represent – HECO, ratepayers, or other.

Given that future resources and grid services are likely to include new technologies and/or new approaches, how does HECO plan to involve the Technology Advisory Panel in comparing

¹⁵ See IGP Report at 15 and Appendix B, at 2.

options solicited through the Request for Information and Request for Proposals as mentioned on Appendix B, pg. 5? The capability of the Technology Advisory Panel could be useful to leverage for third-party review of proposals including new technologies and approaches.

e. RFP Process, Definition of Market Solutions Require Additional Detail

COUNTY supports HECO's effort to achieve "net value" by assessing resource solutions that span across the entire electric system.¹⁶ However, COUNTY believes the Commission should require HECO to provide an additional level of detail regarding its methodology for reaching net value. In particular, additional information is needed regarding the RFP process identified by HECO for transmission and distribution needs, what kinds of entities are envisioned to respond to these RFPs, on what schedule, and how individuals will become involved in potentially providing these services. For instance, though the company points to existing programs and tariffs, it is not specific regarding which programs may need to be expanded or revised, nor are any new tariffs or programs envisioned.¹⁷

Additionally, the Report states that market-based solutions are at the heart of HECO's IGP plan without providing much definition around what is considered a market solution.¹⁸ Given the importance of market solutions to the overall IGP effort in Hawaii, and given the growing third party energy market in the state, COUNTY believes it appropriate for the Company to spell this out in detail. Indeed, the Report states that, "The success of this re-engineered planning and sourcing process will depend on the establishment of an efficient and competitive marketplace that addresses resource and grid needs that create customer value."¹⁹ COUNTY agrees that a marketplace for energy services must develop, but COUNTY would suggest that this statement

¹⁶ See IGP Report at 12.

¹⁷ *Id.* at 14.

¹⁸ *Id.* at 11.

¹⁹ *Id.* at 15.

begs the question who will serve as the judge of whether that marketplace has been established? COUNTY believes that the Commission should be involved in making that determination and urges that the Commission's role be made clear in the Report.

f. Missing Risks and Mitigation Strategy

The process outlined in Figure 3 on page 14 does well to recast conventional planning models for a more integrated, renewables-driven, and potentially distributed-driven future. Given that the proposed IGP Process is different than the IRP Process, COUNTY requests that HECO provide a summary of risks and mitigation strategies for the IGP Process, either at the end of each section or for the full report. A fully enumerated list of risks that is accompanied by thoughtfully considered mitigation strategies is an essential, and absent, component of HECO's proposed IGP Plan. HECO is requested to provide such information and report back to Commission and COUNTY. For example, how will HECO mitigate the challenge of inaccurate net load forecasts for distribution infrastructure and substations? Appendix B, pg. 8 correctly notes this is an issue. Could those forecasts be improved, or can the IGP Process be adapted to accommodate these uncertainties, or can infrastructure be expanded with reasonable-cost "flexibility" to buy-down the risk of an uncertain future?

IV. IGP Process and Methods: Additional Information Requests and Suggested Additions

COUNTY appreciates the information provided by HECO regarding its proposed IGP process and methods but, like the Commission, believes that additional information and details are required prior to moving forward with the framework as set forward in the Report. The following represents COUNTY's additional follow-up questions and requested additions to the proposed IGP process and methods:

- COUNTY is in full agreement that “Customer Needs and Policy Goals” should be included in HECO’s forecasts and planning inputs but would suggest that HECO also include a consideration of how resource planning can improve customer equity and reduce overall energy bills for Hawaii residents.²⁰
- In describing its vision for resource acquisition and solution sourcing, the IGP Report would appear to be short on details regarding how much of the new resource development HECO envisions as utility-owned versus IPP. For instance, COUNTY would request additional visibility into what the utility believes is the right proportionality of utility-owned versus IPP-provided generation, and how will that be determined?²¹
- HECO notes that its SLACA analysis of its distribution systems is currently only conducted on Oahu, and that it plans to extend that to the other islands. COUNTY urges that this expansion to the other islands, including Hawaii Island, be expedited, such that this analysis at least be done to coincide with the first IGP planning cycle. COUNTY may assist with the ‘other inputs’ for future and new development by providing permitting plans/approvals, locations, and timelines.²²
- HECO states in the Report that, “The new distribution planning process will incorporate new tasks as part of the integrated planning process, in addition to the current annual reviews of distribution system capacity, DER circuit hosting capacity...distribution planning will need to identify the distribution needs to accommodate technologies and resources that are brought by the market. One of the challenges distribution planning will face is the identification of needs for a resource

²⁰ See Appendix B, at 2-3.

²¹ See Appendix B at 6.

²² See Appendix B, at 7, Footnote 34.

choice like aggregated DER because of the locational impacts of DER.”²³ It is COUNTY’s view that this statement begs the question what kind of transparency will these issues be given by the Company, and it requires elaboration. Who will have access to the new tasks undertaken as well as the information produced by them, and which working groups will address them?²⁴

- In the IGP Report, HECO calls for the Market Working Group to analyze distribution grid services prior to the commencement of T&D Sourcing and proposes to use four principles in the group’s analysis: Location of where distribution service is provided; timing of when distribution service is provided; level of DER service provided; DER availability and assurance of ability to provide.²⁵ COUNTY supports these four principles and suggests two additional principles be utilized: Value to Ratepayers, which will allow HECO and the Commission to approve services and solutions that carry the greatest ability to reduce energy costs across the islands and provide maximum value to all customers; and the contribution to the RPS targets and reductions in greenhouse gas emissions. HECO indicates in the Report that it intends to form a “select group of non-market participants” to “conduct a comparative evaluation of wires and non-wires alternatives or traditional versus technology-driven alternatives.” This would appear to COUNTY to be an incredibly important assessment, and COUNTY calls for additional information on how this working group relates to the others proposed in the Report, as well as who would comprise the group. Counties should be included on this group.

²³ See Appendix B, at 13.

²⁴ *Id.*

²⁵ Appendix B at 14.

V. Conclusion

COUNTY appreciates the opportunity to comment on HECO's IGP Report and the Commission's Order related to same. Overall, the IGP Report lays out ambitious objectives for this new, complex planning process. Now the difficult work begins on details; the communication structure, timelines, and definitions must be refined.

COUNTY agrees that transparency and continuous, meaningful stakeholder engagement is imperative to the integrity of this process. County supports the Commission's order to retain this in a formal docket and requests that no waiver of the CB Framework be discussed until some evidence supporting the waiver application is provided. COUNTY also supports the development of an IGP Workplan that includes important details necessary to begin this process in an open and efficient manner. In particular, the Workplan should provide a proposal for communication of assumptions, data, and other key information that will be shared across platforms and working groups. It should also include timelines for the analysis proposed in this IGP Report.

As noted throughout these comments, there are some important details missing from the Report that should be provided to the Commission, to stakeholders, and the public as soon as possible. In particular:

- HECO should provide their definition of "net value" and "market-based solutions" as well as baselines and metrics for achieving these objectives.
- The concurrent Performance-Based Regulation docket should be noted and discussed in the IGP process.
- With four proposed Working Groups listed in the report, the Companies should provide a plan for coordination.


- HECO should indicate whether it envisions that the majority of new resource development under this plan will be utility-owned or owned by IPPs.
- Finally, HECO proposes an important evaluation of “wires and non-wires alternatives or traditional versus technology-driven alternatives” to be conducted by non-market participants. COUNTY would appreciate more overall information related to this group, including how it will relate to the Working Groups and how participants will be selected.

In addition to the need for the IGP Report to include more details, COUNTY also believes that the following elements should be included in the IGP process:

- Ratepayer value and equity should be included as objectives. As part of this, the Customer Equity and Bill Reduction Working Group should be added to the list of Working Groups
- “Value to ratepayers” and “greenhouse gas emissions” should be added to the four principles (to make a total of six) in the Market Working Group analysis.
- At this time in the process, it would be prudent for HECO to provide a summary of risks for the IGP process as well as mitigation strategies for those risks.

COUNTY appreciates the opportunity to provide these comments and looks forward to further participation in the Integrated Grid Planning process.

Dated: Hilo, Hawai‘i, October 10, 2018.



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CERTIFICATE OF SERVICE

I hereby certify that the foregoing County of Hawai'i's Comments on the Hawaiian Electric Companies' Integrated Grid Planning Report was duly served on October 10, 2018,

United States mail, postage prepaid, on and properly addressed to the following:

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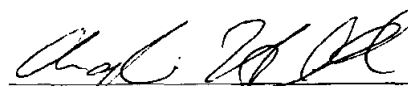
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