

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE

STATE OF HAWAII

In the Matter of

Docket No. 2018-0165

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate
Integrated Grid Planning.

**PROGRESSION HAWAII OFFSHORE WIND, LLC'S COMMENTS ON
HAWAIIAN ELECTRIC COMPANIES' FIRST REVIEW POINT**

AND

CERTIFICATE OF SERVICE

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Progression Hawaii Offshore Wind, LLC (“PHOW”), by and through its attorneys Schlack Ito, A Limited Liability Law Company, and pursuant to Order No. 37604 filed February 4, 2021,¹ hereby submits its comments on the Hawaiian Electric Companies’² First Review Point (“FRP”), as follows.³

As explained below, in this submission PHOW offers comments in two related areas. First, PHOW provides responses to the eight enumerated questions identified by the Commission in Order No. 37604. In addition, PHOW takes this opportunity to highlight and offer comments on key issues raised in the FRP concerning procurement and interconnection. Specifically, these comments address the viability and necessity for a long-term Request for Proposals (“LT RFP”), as well as related improvements to the process for interconnection of utility-scale renewable generation.⁴ The comments in both areas draw from the FRP, including sections 1 through 3 of the narrative report, as well as Exhibit A.1, “Draft IGP Inputs and

¹ Order No. 37604, Establishing a Procedural Schedule for the First Review Point, issued February 4, 2021 (“Order No. 37604”).

² Hawaiian Electric Company, Inc. (“HECO”), Hawaii Electric Light Company, Inc., and Maui Electric Company, Limited (collectively, “Hawaiian Electric” or “Companies”).

³ PHOW’s comments on the First Review Point are timely filed pursuant to Order No. 37604, which states that comments by intervenor parties (such as PHOW) are due on or before February 25, 2021. *Id.* at 2, 7.

⁴ PHOW’s comments on the LT RFP and interconnection issues are offered consistent with the statement that the Commission “encourages the Parties to be more expansive in their comments, and address any aspect of the First Review Point.” *See* Order No. 37604 at 6 (emphasis added).

Assumptions” (“Exhibit A.1”). Accordingly, the key points from PHOW’s comments in this submission may be briefly summarized as follows:

- PHOW does not object to the presentation of inputs and assumptions as to utility-scale offshore wind generation (“offshore wind”), subject to the necessity for supplemental and more robust data and information to ensure timely and viable long-term procurement processes.
- PHOW offers brief comments with regard to electric vehicle charging, programs and tariffs, procurement solution sourcing, retrospective evaluation, and Technical Advisory Panel review.
- Most importantly, PHOW strongly supports further Commission action as may be necessary to support and implement the LT RFP and improvements to the interconnection process, both of which are fundamental to achieving Hawaii’s 100% Renewable Portfolio Standard (“RPS”) by 2045.⁵
- Specifically, PHOW urges the Commission to approve the LT RFP in concept in the IGP docket, and to direct Hawaiian Electric to prepare and file an LT RFP for Commission review and approval within approximately the next one to two years.

Each of these points is discussed in greater detail below.

I. PARTICIPATION IN IGP WORKING GROUP PROCESS

PHOW appreciates the opportunity to provide these comments consistent with its ongoing commitment and participation in the Integrate Grid Planning (“IGP”) process since it was admitted as an intervenor party in this proceeding over two years ago.⁶ PHOW is an

⁵ See Part V of Haw. Rev. Stat. ch. 269 (“Hawaii RPS law”).

⁶ See Order No. 35727 Admitting Intervenors, issued October 2, 2018, at 1, 24.

experienced developer of renewable energy projects in Hawaii. Members of the PHOW team have been involved in developing, constructing, owning and operating several of the largest utility-scale energy projects now operating in Hawaii and have been actively engaged in developing offshore wind projects in Europe, North America, Hawaii and Asia.

PHOW continues to devote time and resources to ensuring that commercial development of offshore wind generation remains an attractive and viable option in Hawaii. As part of this commitment, PHOW strongly supports a Hawaii-specific strategy that coordinates the multiple regulatory processes – including multiple opportunities for stakeholder and community input and participation – that are required for an offshore wind project to achieve a commercial operations by the targeted date of 2032.

Consistent with the focus on offshore wind generation, PHOW has been a dedicated participant in the Competitive Procurement Working Group (“CPWG”). PHOW has actively engaged in dialogue and provided multiple suggestions to improve the competitive procurement process. PHOW’s emphasis has been on the twin objectives of procuring resources from long-term projects and promoting mechanisms that encourage collaboration between the utility and developers to generate cost-savings throughout project development, especially concerning interconnection. As a general position, reliability and resiliency requirements should be balanced with benefits to utility customers and shareholders. PHOW appreciates that many of its contributions and inputs in the CPWG process are reflected in the working group’s final work products.

PHOW has similarly been an active participant in the Solution Evaluation and Optimization Working Group (“SEOWG”). Although the current modeling efforts can be improved upon, PHOW acknowledges the transparency Hawaiian Electric has provided in

sharing its modeling assumptions and results as part of the SEOWG process. As with the CPWG, PHOW appreciates that many of its contributions and inputs are reflected in the working group's final work product.

II. COMMENTS ON ITEM NOS. 1-8

A. Item Nos. 1-3 Concerning Exhibit A.1.

PHOW offers brief comments on Item Nos. 1-3 concerning baseline forecasts, stakeholder feedback and working groups, and approval of IGP assumptions, respectively, and how these items relate to the inputs and assumptions in Exhibit A.1 – with a specific focus on offshore wind generation. The discussion of offshore wind in Exhibit A.1 is generally limited to a brief narrative concerning data sources and a separate table on cost information.⁷ With regard to data sources, Exhibit A.1 states:

Offshore Wind Data Source

The source data for the offshore wind estimate was developed in collaboration with stakeholders. The underlying costs for both capital and O&M were based on the NREL report “Cost of Floating Offshore Wind Energy Using New England Aqua Ventus Concrete Semisubmersible Technology.” Cost trends provided in the study for capital and O&M were used as initial data points for capital and O&M costs from 2020-2032. Capital and O&M costs for years 2033-2050 were not available in the study so the cost forecast for the remaining years was estimated based on NREL’s Annual Technology Baseline (ATB) for the off-shore wind technology. The percent change in capital and O&M cost from NREL was used to approximate the cost trend for 2033-2050 for offshore wind With regard to the Exhibit A.1 baseline forecasts, Location Adjustment

The capital costs were converted to Hawai’i costs using a 35% EIA factor for wind technology. The O&M costs were converted to Hawai’i using an 18.5% RSMMeans factor. The location-specific interconnection costs were not included in the estimate, however, 1

⁷ It is noted that section 2.3 of the FRP, “Forecast Assumptions Working Group (‘FAWG’),” does not contain any reference to offshore wind generation.

kilometer of interconnection on dry land was included in the cost estimate as provided in the offshore wind study.⁸

Exhibit A.1 also includes Table 72, “Capital and O&M Costs for Resource Options (Offshore Wind, Grid-Scale Storage)” (“Table 72”).⁹

1. Item No. 1 (baseline forecasts).¹⁰

PHOW’s position at this time is that the information in Exhibit A.1, i.e., the data sources narrative and Table 72, help to provide a foundation for a “baseline set of forecasts and assumptions”¹¹ and thus a reasonable starting point for IGP long-term planning. The information in Exhibit A.1 should be considered as an initial starting point only, however. Additional and more robust data and information will be need to fully inform and develop the inclusion of offshore wind in the IGP process. PHOW has concerns about the extent to which Exhibit A.1 reflects current real-world development data and information.

In addition, although the narrative and Table 72 were sufficient to provide an initial approximation, they must be updated. For example, as discussed in a recent SEOWG meeting, there is a pending study by the National Renewable Energy Laboratory (“NREL”) focusing on Oahu resources. The baseline forecasts should be updated based on the result of this NREL Oahu study when it is completed and after review and comment on the study results by stakeholders.¹²

⁸ Exhibit A.1, Hawaiian Electric 2020 Integrated Grid Planning Inputs and Assumptions, Draft September 2020 (“Inputs and Assumptions”) at 39 (citations omitted).

⁹ Exhibit A.1, Inputs and Assumptions at 87.

¹⁰ See Order No. 37604 at 3 (“1. Reference: First Review Point, Exhibit A.1. Is the baseline set of forecasts and assumptions proposed in Exhibit A.1 of the First Review Point a reasonable starting point for IGP long-term planning? If so, why? If not, why not? If more information is necessary to answer this question, please explain.”).

¹¹ *Id.*

¹² Under an interagency agreement with the Bureau of Ocean Energy Management (“BOEM”), NREL is conducting a study to evaluate the cost of implementing floating offshore wind near Oahu based on NREL’s Offshore Regional Cost Analyzer (“ORCA”) model using up-to-date floating offshore wind technology information. To tailor the ORCA cost model assumptions specifically to Hawaii, BOEM and NREL sought input from the SEOWG and IGP Stakeholder Council. See IGP Solution Evaluation & Optimization Working Group: Offshore Wind Study Meeting

2. Item No. 2 (stakeholder feedback and working groups).¹³

From PHOW's perspective as concerns offshore wind, the data and information in Exhibit A.1 sufficiently incorporates stakeholder feedback. PHOW submits, however, that additional time is needed for stakeholders to discuss the options and share input. The process should continue to gather input from stakeholders in the procurement process, including the development of the upcoming RFP, selection and interconnection study processes. In addition, the process should be structured to facilitate small group interactions among the stakeholders. This may be achieved by using an online platform that better supports small-group discussion and collaboration through break-out rooms, etc. Large online meetings (with over eighty participants in some instances) should be appropriately balanced with small-group interaction.

3. Item No. 3 (approval of IGP assumptions).¹⁴

PHOW's position at this time is that the Commission should approve the IGP inputs and assumptions presented in Exhibit A.1 concerning offshore wind. Notwithstanding this general support, PHOW shares concerns about the utility's reliance on the RESOLVE model with regard to modeling of offshore wind. In the initial model results shared in in 2020, the projection was that offshore wind resources would not be needed on the HECO grid until 2040 to meet RPS mandates.

PHOW strongly supports a proactive and timely approach to procuring renewable resources necessary to achieve the 100% RPS mandate will in advance of 2045. There is a concern that the current approach, as reflected in the modeling and otherwise, favors delaying the

Summary (January 22, 2021), *available at* <https://www.hawaiielectric.com/clean-energy-hawaii/integrated-grid-planning/stakeholder-engagement/working-groups/solution-evaluation-and-optimization-documents>.

¹³ See Order No. 37604 at 3 (“2. Reference: First Review Point, Exhibit A.1. Does the First Review Point, Exhibit A.1 (i.e., the draft inputs and assumptions) sufficiently incorporate stakeholder feedback, or transparently explain why it did not, consistent with Commission guidance?”).

¹⁴ See Order No. 37604 at 4 (“3. Reference: First Review Point, Exhibit A.1. Please explain if the Commission should approve, reject, or modify the IGP inputs and assumptions presented in the First Review Point, Exhibit A1, and specifically identify any modifications that should be required before approval.”).

necessary procurement of these resources until closer to 2045, as exemplified by modeling results not calling for offshore wind until 2040. This would be only five years before the RPS statutory year of 2045 and would not allow sufficient time given the ten to fifteen year development time period for offshore wind generation. PHOW submits that this approach also fails to properly account for risks of delays in the development process, especially as competition increases over available project sites. Accordingly, the foregoing demonstrates that RESOLVE modeling is limited insofar as it lacks the appropriate inputs to produce accurate results.

B. Item Nos. 4-8 Concerning Other FRP Matters.

1. Item No. 4 (electric vehicle ('EV') charging).¹⁵

At this time, PHOW has no objection to Hawaiian Electric's proposed treatment of EV charging. The Companies propose that the unmanaged vehicle charging assumption will be incorporated into the baseline forecast, and the outcomes from managed charging will subsequently modify this forecast based on specific program provisions. PHOW views this as a reasonable way for Hawaiian Electric to treat electric vehicle charging at this juncture in the IGP process.

2. Item No. 5 (programs and tariffs).¹⁶

At this time, PHOW has no objection or concern with regard to Hawaiian Electric's proposed treatment of programs and tariffs. The Companies propose to not include pending programs and tariffs pertaining to distributed energy resources, electrification of

¹⁵ See Order No. 37604 at 4 ("4. Reference: First Review Point at 5-6. Hawaiian Electric explains that the unmanaged vehicle charging assumption is incorporated into the baseline forecast and the outcomes from managed charging will then modify this forecast based on specific program provisions. Is this a reasonable way for Hawaiian Electric to treat electric vehicle charging? If so, why? If not, why not? If more information is necessary to answer this question, please explain.").

¹⁶ See Order No. 37604 at 4 ("5. Reference: First Review Point at 9. Hawaiian Electric proposes not to include energy distributed energy resources, or electrification of transportation tariffs, and programs from ongoing Commission dockets in this first IGP cycle. Please explain if it is appropriate for Hawaiian Electric to wait until the next IGP cycle to include these tariffs and programs. If not, please propose a remedy. Please be as specific as possible.").

transportation, and similar initiatives in the first IGP cycle. PHOW views this as reasonable to the extent these programs and tariffs are not subject to a final Commission order at this juncture in the IGP process. Although this may be acceptable for the first IGP cycle, all future IGP cycles should properly consider relevant approved programs and tariffs.

3. Item No. 6 (procurement solution sourcing).¹⁷

At this time, PHOW has no objection to Hawaiian Electric's proposed use of procurements for solution sourcing. The FRP appears to propose that Hawaiian Electric will initially source solutions solely through procurement, and then consider near-term needs not met through procurement in a follow-on procurement, or in a program or tariff. In general, PHOW supports the central focus on market-based procurement in the IGP process. The Companies' proposal appears to be consistent with that approach.

4. Item No. 7 (retrospective evaluation).¹⁸

At this time, PHOW's view is that retrospective evaluation of IGP deliverables by the newly formed Stakeholder Technical Working Group would not provide benefits commensurate with the additional time spent. PHOW favors devoting limited time and resources in the IGP process to forward-looking actions and initiatives.

¹⁷ See Order No. 37604 at 5 ("6. Reference: First Review Point at it, 30. The IGP Workplan proposed to consider programs concurrent with the request for information ("RFI") step within the competitive procurement process. The First Review Point includes a proposed updated sourcing process that appears to indicate that Hawaiian Electric will source solutions solely through procurement first. Then Hawaiian Electric would consider near term needs not met through procurement in a follow-on procurement and/or program or tariff. Is it appropriate for Hawaiian Electric to source solutions via procurements before considering pricing and programs? Should Hawaiian Electric compare solutions sourced through pricing, programs, and procurements simultaneously?").

¹⁸ See Order No. 37604 at 5-6 ("7. Reference: First Review Point at 12. Would retrospective evaluation of IGP deliverables by the newly formed Stakeholder Technical Working Group provide benefits commensurate with the additional time spent?").

5. Item No. 8 (Technical Advisory Panel ('TAP') review).¹⁹

At this time, PHOW views the response from the TAP as sufficient to constitute independent review. PHOW notes that the TAP is expected to continue to be involved in evaluating IGP outputs in the future on an ongoing basis.

III. COMMENTS ON LONG-TERM RFP AND INTERCONNECTION

PHOW appreciates that the IGP process has confirmed – throughout the working group process that has culminated in the FRP – the continued need for active consideration of offshore wind as a necessary source of renewable generation to contribute toward achievement of the 100% RPS mandate. As noted above, PHOW's comments on the LT RFP and interconnection issues are offered (in addition to the above comments on Items Nos. 1-8) consistent with the Commission's encouragement that parties address "any aspect of the First Review Point."²⁰

For the following reasons, PHOW proposes that the Commission should approve the LT RFP in concept in the IGP docket, and direct Hawaiian Electric to prepare the and file an LT RFP for Commission review and approval within approximately the next one to two years.

First, the LT RFP will fulfill the long-term focus of the IGP process. The IGP Framework and IGP Workplan both call for long-term planning. One major benefit of the IGP process is that it encourages the Companies to align long-term energy planning with the RPS and to shape a realistic plan to achieve the 100% RPS by 2045. This longer-term view encourages the Companies and the Commission to consider sourcing renewable generation from a diverse range of technologies and projects.

¹⁹ See Order No. 37604 at 7 ("8. Reference: First Preview Point at 200-207. Is this response from the Technical Advisory Panel sufficient to provide independent review? If not, what additional independent review would be appropriate?").

²⁰ See Order No. 37604 at 6.

Second, despite the many benefits of utility scale solar photovoltaic generation facilities paired with battery energy storage systems (“solar plus storage”), it will be necessary to add renewable generation from sources other than solar plus storage projects to achieve the 100% RPS mandate. For example, it is PHOW’s understanding that the Hawaii Natural Energy Institute believes Oahu will be able to achieve a maximum of only seventy percent RPS relying on solar plus storage projects. Thus, to achieve the 100% RPS mandate it will be necessary to consider adding renewable generation from other sources, including but not limited to offshore wind, geothermal, pumped storage, hydrogen, and potentially large-scale solar projects that require time-intensive transmission upgrades.

Similarly, the LT RFP is necessary due to basic features of the long-term project development process, particularly with regard to capital investments. For example, long-term projects may have a development period of approximately ten to fifteen years. For an offshore wind project to meet a commercial operations date in 2032, for example, the RFP would likely need to be issued in late 2021 or early 2022. Such projects will also require significant capital investments. Compared to short-term solar projects, long-term projects require more costly energy resource studies, interconnection studies, and leases of ocean or land space and engineering. To make these early stage investments, long-term projects would need to be selected in an RFP to ensure the power purchase contract was in place or in negotiation. In short, a project must be selected through an RFP to secure such capital investments.

In addition, and as explained above, it is imperative for the utility to procure the maximum feasible amount of renewable generation as early as possible and well in advance of 2045. This because project development costs, based on competing priorities for limited land and resources in Hawaii, are expected to increase as Hawaii progresses toward achieving the

100% RPS mandate. In this context, postponing the development of long-term projects until closer to 2045 is not prudent or reasonable. Rather, it is necessary to proceed now with the LT RFP.

Third, the LT RFP and attendant procurement process will provide a necessary framework for the development and procurement of long-term projects. Solar plus storage projects typically require four to five years to reach commercial operations, while long-term projects – such as offshore wind, geothermal, pumped-storage or hydrogen – are likely to require ten to fifteen years to reach commercial operations. Enabling long term projects to be proposed in parallel with short-term solar projects would allow the utility to procure designated amounts of both short-term and long-term generation resources simultaneously, without short-term and long-term projects competing against each other. It will also facilitate the necessary planning, coordination of regulatory processes, studies, and stakeholder engagement over an extended time period for these projects. The intended result of the LT RFP will be a larger, more diverse range of energy technologies and projects.

Fourth, the LT RFP is consistent with and supported by State energy policy, including the Hawaii RPS law, the 2045 decarbonization mandate,²¹ and Performance-Based Regulation (“PBR”).²² As previously explained, the LT RFP is necessary to achieve the 100% RPS mandate. Replacing existing fossil fuel generation with renewable resources will result in reductions of greenhouse gas emissions. And the PBR regime includes the RPS-Accelerated performance incentive mechanism, which rewards the utility for accelerating achievement of

²¹ See Haw. Rev. Stat. § 225P-1 (to protect the State’s economy, environment, health, and way of life the State will mitigate its greenhouse gas emissions by sequestering more atmospheric carbon and greenhouse gases than the State produces as quickly as practicable, but no later than 2045).

²² See Decision and Order No. 37507, Docket No. 2018-0088, issued December 23, 2020 (“D&O 37507”).

RPS mandates.²³ By promoting procurement of long-term resources, the LT RFP will aid the utility in its efforts to comply with these statutory mandates and energy policies.

Fifth, the LT RFP is readily implementable insofar as it is consistent with and builds upon the current Stage 1 and Stage 2 RFPs in Docket No. 2017-0352. The LT RFP will require modifications to the Stage 2 RFP documents and timelines, but would generally follow the same processes and procedures. PHOW strongly recommends, however, that the utility continue to seek input from multiple stakeholders in developing an LT RFP, an LT Model PPA and an LT interconnection requirements study (“IRS”) process to reduce delays and incorporate shared savings mechanisms. The involved stakeholders should include multiple developers of potential LT energy projects with relevant experience and expertise.

Sixth, the LT RFP will provide a basis for the Commission to address interconnection delays by approving an RFP that pro-actively addresses and reduces interconnection delays and costs. The LT RFP should incorporate a shared savings mechanism to address interconnection delays and costs. This would incentivize the utility and developer to work together to accelerate interconnection studies, pursue more time-saving designs and less costly equipment, and optimize interconnection costs.

Finally, PHOW submits that upon review and consideration potential impediments or barriers do not provide a basis for failing to move forward with the LT RFP within the next one to two year period. For example, the ongoing BOEM process does not provide a basis for delaying the LT RFP. To the contrary, PHOW views the BOEM process as complementary to the LT RFP insofar as it will require review and examination of key aspects of the project development process. In that respect, BOEM review is essentially the same as similar review processes for many other governmental permits and approvals necessary for an offshore

²³ See D&O 37507 at 114-23.

wind project. It is not necessary to complete the BOEM process before initiating the LT RFP. Rather, that process may properly continue along with other agency processes without delaying the LT RFP.

Similarly, the ongoing community outreach process also does not provide a basis for delaying the LT RFP primarily because community outreach is expected to continue throughout the offshore wind development process. PHOW has been conducting community outreach about offshore wind since 2012. PHOW remains committed to continuing the community outreach process during the lengthy development process and into the foreseeable future.

The development process is intended identify, consider and possibly incorporate commercially reasonable changes to the project design based in part on the community outreach process. It is not necessary to achieve a relatively definitive substantive conclusion or determination from the ongoing community outreach process prior to moving forward with the LT RFP. Rather, the LT RFP should be properly viewed as a necessary next step in continuing the community outreach process because it will allow community review of more specific offshore wind project proposals.

It is also noted that an LT RFP is expected to comply with the Framework for Competitive Bidding (“CBP”) and the CBP is not expected to be an issue or impediment as to the LT RFP. On February 12, 2021, HECO filed its “Submission of an Updated Framework for Competitive Bidding.” This submission notes that the CPWG discussed the need for a “long-term RFP track for projects that have longer developmental timelines (8-12 year timeframe).”²⁴ The submission concludes: “Presently, the group believes that the CBF is broad and flexible enough to incorporate long-term RFPs and therefore has not proposed specific updates at this

²⁴ *Id.*, Exhibit 1 at 2-3.

time, and will work together to address specific issues in these future procurements.”²⁵

IV. CONCLUSION

For all of the foregoing reasons, PHOW respectfully requests the Commission to consider and act upon the foregoing comments with regard to the First Review Point, and to grant any further relief the Commission deems just and proper.

DATED: Honolulu, Hawaii, February 25, 2021.

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²⁵ *Id.*, Exhibit 1 at 3.

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