



November 22, 2021

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. 2017-0352 – To Institute a Proceeding Relating to a Competitive Bidding Process to Acquire Dispatchable and Renewable Generation Development of Stage 3 RFP for Hawai‘i Island

In light of Hawaiian Electric’s¹ November 2, 2021 notice of withdrawal of its request for Commission approval of the Power Purchase Agreement for Renewable Dispatchable Generation and related requests filed on November 13, 2020 in Docket No 2020-0189 for the ENGIE 2020 ProjectCo-HI1 LLC project (“ENGIE Project”), the Company is providing an update on the draft Request for Proposals for Hawai‘i Island (“Stage 3 Hawai‘i RFP”), filed on October 15, 2021.

With the withdrawal of the ENGIE Project, the Company has re-evaluated the provision in Section 1.2.6 of the Stage 3 Hawai‘i RFP that requires that “Projects submitted into this RFP must be located on the eastern portion of the Hawai‘i Electric Light system.”² The Company will now broaden where Projects can be located to include portions of the western area of the island. In addition to the interconnection points located on the eastern portion of the system, the Company will also offer three substations on the west side for potential interconnection: Ouli, Poopomino,³ and Keamuku.⁴ The Company will also make available interconnection to transmission lines on the west side and cross-island transmission lines in the Saddle Road, Hamakua Coast, and Waimea areas.⁵ The Company estimates it will need to push out the filing of a proposed final RFP

¹ “Hawaiian Electric” or the “Company” collectively refers to Hawaiian Electric Company, Inc., Hawai‘i Electric Light Company, Inc., and Maui Electric Company, Limited.

² Area defined as, having “Point(s) of Interconnection interconnect to the 69 kV lines or substations within the area extending south of the Pepe‘eoko Switching Station, north of the Puna Power Plant Switching Station, and east of the Kaumana Switching Station.” Within these areas, “Projects can interconnect via a new substation to a 69 kV transmission-level line. The Company will also offer available space within two existing Company substations for interconnection consideration – the Puueo substation and the Kanoelehua substation. Proposers must inquire about the transmission line available MW capacity or substation conditions.”

³ Should a Proposer select to interconnect to the Poopomino substation, the Proposer must work with a private landowner to secure land rights for the substation expansion.

⁴ Should a Proposer select to interconnect to the Keamuku substation, the Proposer should expect to construct a new switching station adjacent to the existing Keamuku substation.

⁵ The following transmission lines will not be included: the 7200 transmission line (connecting Waimea and Keamuku) and the 8100 transmission line (connecting Anaehoomalu and Keamuku). The Company will be seeking locational diversity in the Stage 3 Hawaii portfolio to support resiliency. Total interconnection to the west areas will be limited to 60 MW of capacity.

The Honorable Chair and Members
of the Hawai'i Public Utilities Commission
November 22, 2021
Page 2

approximately two months from the January 28, 2022 date that was in the Company's proposed schedule. This additional time will provide the Company the needed time to compile details on the additional interconnection scope expansion, transmission line available MW capacity, and substation conditions, to assist Proposers in developing their bids.

The Company does not intend to revise any other requirement in the Stage 3 Hawai'i RFP based on the withdrawal of the ENGIE Project.

In the interim, the Company requests that the Commission continue to proceed with the review process of the Stage 3 Hawai'i RFP in this docket to allow for guidance to be provided by the Commission and feedback provided by stakeholders on all other aspects of the RFP. The Company can then file a proposed final RFP that both incorporates the additional interconnection scope and addresses any further guidance on other aspects of the RFP.

The Companies look forward to working with the Commission, the Independent Observer, and stakeholders to finalize the RFP and launching a competitive and successful procurement.

Sincerely,

/s/ Rebecca Dayhuff Matsushima

Rebecca Dayhuff Matsushima
Director
Renewable Acquisition

cc: Division of Consumer Advocacy