

Area	Joint Party Recommendations	Disposition	
Area 1: Transparent/Expedited Interconnection Timelines	1. Make clear to what extent CBRE projects are reviewed and approved under Rule 14H, apply ongoing Rule 14H process improvements related to DERs to CBRE projects.	Quick Win	
	2. For small projects (e.g., < 250 kW), waive interconnection studies for projects sited in locations with available hosting capacity (based on LVMs).	Quick Win	
	3. For mid-size projects (e.g., 1-2.5 MW), develop a modular pre-approved basic interconnection and performance design, system impact review and cost estimate.	Parking Lot	
	4. Develop and disclose standard interconnection cost and time schedules with complete assumptions before RFP is issued.	Quick Win	
	5. Communicate early and regularly with developers to manage costs/expectations.	a. Conduct early scoping meetings to address interconnection questions.	Parking Lot
		b. Identify what items of the scope of work can be done by developer to reduce costs.	Quick Win
		c. Provide developers with a short list of vendors that HECO has worked with in the past and/or understand HECO's system for developers to use for their system parameter assumptions.	Parking Lot
	6. Allow reasonable increases to project size that may arise in the course of project development, if there is capacity headroom (e.g., during shoulders of the solar day).	Parking Lot	
	7. File a notice with the Commission if/when a step in the interconnection process will be delayed by more than 30 days from previously established timeline. Notice should include a description of project, reason for delay in process, and near-term actions/pathways to ensure project remains viable/on track for interconnection.	Quick win	
		a. Streamline the scope, cost, and time of system impact and facilities study IRS to address only what is necessary.	Quick win
b. Standardize interconnection facilities requirements as much as possible (e.g., transformers and related breaker and switches) to promote efficiencies and economies of scale in production and procurement.		Quick win	
c. Simplify communication and reporting requirements to a standard, repeatable minimum essential design.		Quick win	

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	8. Streamline, streamline, streamline (examples):	d. Simplify inverter performance modeling and testing requirements.	Quick win	
		e. Use generic models for T&D modeling for projects of certain sizes.	Quick win	
		f. Eliminate or streamline system level analyses in the system impact component of the IRS.	Quick win	
		g. Eliminate or streamline need to redo IRSs in response to non-major changes in project capacity; allow discrete, targeted supplements to IRS only as necessary.	Quick win	
	9. Grid transparency:	a. Provide quarterly updates to LVMS; include secondary distribution system and line capacity.	Parking Lot	
		b. Disclose all LVM/hosting capacity assumptions.	i. Clarify whether the shoulders of the solar day can be used to export, to optimize the quantity of storage and make informed economic decisions about the benefits of tracking and DC coupling.	Quick win
			ii. Do not double-count PV + storage in assessing hosting capacity.	Quick win
		c. Share better data (grid assumptions) with developers to shorten back and forth with utility (usually takes about 6 months).	Quick win	
		d. Develop an "interconnection corridor/opportunity map" that identifies cost to interconnect in certain areas of the islands.	Oppose	
	Interconnection Cost Estimates	1. Publicly disclose unit costs (e.g., file an Annual Unit Cost Guide in 2021-0024 (Interconnection Docket)), providing component/technology costs (i.e., poles, metering, telemetry requirements) and estimated costs for a variety of project sizes and resource generation (i.e., solar, storage, wind, etc.).	a. Provide for independent review of unit costs (including labor costs) to ensure the costs are reasonable.	Parking Lot
b. Clarify when and why DTT would be necessary for CBRE projects.			Quick win	

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Area 2: Transparent, Accurate, Verifiable Interconnection	2. Provide developers and/or Commission with an invoice/report on HECO's project management costs related to each project's interconnection process. Alternatively, file a report with the Commission detailing HECO's project management costs for interconnection after each RFP.			Parking Lot
	3. Allow for a level of cost adjustment to be built into the total project cost (i.e., network upgrades, interconnection facilities, etc.).			Oppose
Area 3: Performance Mechanisms	1. For small projects (e.g., <250 kW), establish standard interconnection fee or interconnection cost cap (e.g., California commercial NEM projects <1 MW); alternatively, implement cost envelope (described below).			Quick Hit
	2. Implement cost envelope for interconnection for small and/or large projects (e.g., California and Massachusetts).	a. Require shareholders/utility to bear interconnection costs that exceed a certain percentage (e.g., 25%) of cost estimate; utility can ratebase cost exceedances only upon a showing of good cause/reasonableness for exceedance.		Parking Lot
		b. If actual costs are less than a certain percentage (e.g., 75% of cost estimate), savings go to ratepayers.		Parking Lot
		c. (Alternatively, apportion cost overages among developer, utility/shareholders, and ratepayers in equal		Parking Lot
Area 4: Independent Evaluation of Interconnection Costs and Timelines	1. Independent Engineer to oversee and facilitate process improvements stated above.	a. Provide input and "second opinion" on standardized unit costs.		Parking Lot
		b. Provide recommendations to PUC on necessary decisions and other action items		Parking Lot
		c. Review/preside over disputes re cost, process, time.		Parking Lot
Area 5: Dispute Resolution	1. Create dispute resolution process for disputing costs, process, time (oversight by Independent Engineer).	a. Coordinate with IO to provide recommendations for PUC review and disposition within expedited timeframe.		Parking Lot
		b. Gain better understanding of developer rights to dispute any cost overages or utility determinations		Parking Lot
		c. Gain better understanding related to the need for developers to sign a "Hold		Parking Lot
Area 6: Developer Training	Developer Training			Quick win
	PUC: More comprehensive interconnection reforms			Parking Lot

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Parking Lot (Suggested by PUC)	PUC: Cluster Studies			Parking Lot
	PUC: A methodology for proactive upgrades in areas with forecasted high penetration of new generation			Parking Lot
	PUC: Interruptible export service (eg active network management) with tariffs that encourage positive export behavior			Parking Lot
	PUC: Coordinating export tariffs with ARD underway			Parking Lot