



DEPARTMENT OF THE CORPORATION COUNSEL

COUNTY OF MAUI  
200 SOUTH HIGH STREET  
WAILUKU, MAUI, HAWAII 96793  
TELEPHONE: (808) 270-7740  
FAX: (808) 270-7152

May 21, 2004

Public Utilities Commission  
State of Hawaii  
465 South King St., Rm. 103  
Honolulu, HI 96813

PUBLIC UTILITIES  
COMMISSION

May 24 1 04 PM '04

FILED

ATTENTION: Chief Clerk of the Commission

Re: In the matter of PUBLIC UTILITIES COMMISSION Instituting  
a Proceeding to Investigate Distributed Generation In  
Hawaii; Docket No. 03-0371

Dear Chief Clerk of the Commission:

Enclosed for filing is the following:

1. COUNTY OF MAUI'S INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC LIGHT COMPANY, INC., AND MAUI ELECTRIC COMPANY, LIMITED; CERTIFICATE OF SERVICE (Original + 10)

Please return the file-marked copies to this office. A self-addressed, stamped, envelope is enclosed for your convenience.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*Kay A. Ozawa (Secretary)*  
CINDY Y. YOUNG  
Deputy Corporation Counsel

CYY:ko  
Enclosures

S:\CLERICAL\KAO\PUC\Ltr\puc.03-0371.wpd

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

PUBLIC UTILITIES  
COMMISSION

MAY 24 1 04 PM '04

FILED

In the Matter of )  
 )  
PUBLIC UTILITIES COMMISSION )  
 )  
Instituting a Proceeding to )  
Investigate Distributed )  
Generation in Hawaii. )  
\_\_\_\_\_ )

DOCKET NO. 03-0371

**COUNTY OF MAUI'S INFORMATION REQUESTS TO  
HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC  
LIGHT COMPANY, INC., AND MAUI ELECTRIC COMPANY, LIMITED**

**CERTIFICATE OF SERVICE**

DEPARTMENT OF THE CORPORATION COUNSEL 205

BRIAN T. MOTO 5421-0  
Corporation Counsel  
CINDY Y. YOUNG 7443-0  
Deputy Corporation Counsel  
County of Maui  
200 S. High Street  
Wailuku, Maui, Hawaii 96793  
Phone: (808) 270-7740  
Attorneys for Intervenor  
COUNTY OF MAUI

S:\CLERICAL\KAO\PUC\Distributed Gen\Info Request.wpd

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of )  
 )  
PUBLIC UTILITIES COMMISSION )  
 ) DOCKET NO. 03-0371  
Instituting a Proceeding to )  
Investigate Distributed )  
Generation in Hawaii. )  
\_\_\_\_\_ )

**COUNTY OF MAUI'S INFORMATION REQUESTS TO  
HAWAIIAN ELECTRIC COMPANY, INC., HAWAII ELECTRIC  
LIGHT COMPANY, INC., AND MAUI ELECTRIC COMPANY, LIMITED**

The following are the County of Maui's ("COM") Information Requests ("IRs") to Hawaiian Electric Company, Inc. ("HECO"), Hawaii Electric Light Company, Inc. ("HELC"), and Maui Electric Company, Limited ("MECO"), collectively referred to as the "Companies", regarding the Companies Preliminary Statement of Position ("SOP"). The IRs are designated as COM-Companies-SOP-(number).

COM-Companies-SOP-IR-1

Page 16, T&D System Impacts: Provide all summaries, studies, reports, or other documentation detailing the problems for customers and utilities with initial installations of small-scale DG units at customers' sites.

COM-Companies-SOP-IR-2

Page 17, Lost Revenue: Provide any mathematical examples prepared by the Utility of how utility ownership reduces the loss of fixed costs, and allows the structure of costs so that all parties are better off.

COM-Companies-SOP-IR-3

Page 19, DG Diversity Studies: Provide any analysis done by HECO or MECO on the number and/or size of Distributed Generation ("DG") units required to "create diversity" or how that diversity benefit would be measured.

COM-Companies-SOP-IR-4

Page 20, DG Distribution System Benefits: Is it required that DG units be located "at" targeted substations to increase reliability, or merely be connected to circuits served by those substations? Provide any relevant articles and analysis regarding this issue.

COM-Companies-SOP-IR-5

Page 20, Radial vs. Network Benefits of DG: Provide a list of communities and subcommunities on Maui served by radial distribution lines.

COM-Companies-SOP-IR-6

Page 21 DG Lost Margins: Provide the underlying analysis supporting the statement that DG benefits would be "generally more than offset" by the utility's revenue loss.

COM-Companies-SOP-IR-7

Page 21, Avoided Utility System Costs: Provide any studies done on the MECO system that identify potential transmission or central station costs that could be avoided through targeted DG.

COM-Companies-SOP-IR-8

Page 21, Avoided Utility System Costs: Provide any studies done by MECO regarding the transmission and/or distribution cost savings that would result from any specific DG proposals made by the Company or its customers in the last four years.

COM-Companies-SOP-IR-9

Page 21, Avoided Utility System Costs: Provide a complete copy of the current MECO line extension policy as it applies to a developer of a new residential condominium, including any analysis of the linkage between the line extension charges and the marginal cost of new transmission and distribution capacity discussed in question (13) above. To enhance practical understanding of the line extension policy, provide at least two examples of calculations under that line extension policy, at least one of which required the developer to make a contribution in aid of construction or customer advance in order to obtain service from MECO. The names of the actual customers may be deleted for privacy.

COM-Companies-SOP-IR-10

Page 21, Avoided Utility System Costs: Provide a complete copy of the current MECO line extension policy as it applies to a developer of a new Schedule P hotel or commercial structure, including any analysis of the linkage between the line extension charges and the marginal cost of new transmission and distribution capacity discussed in question (13) above. To enhance practical understanding of the line extension policy, provide at least two examples of calculations under that line extension policy. If any Schedule P customer connections in the past four years required the developer to make a contribution in aid of construction or customer advance in order to obtain service from MECO, provide the line extension study or studies. If such line extension study cannot be provided, provide two example line extension studies that did not trigger a developer contribution. The names of the actual customers may be deleted for privacy.

COM-Companies-SOP-IR-11

Page 22, Avoided Utility System Costs: Provide the most recent estimates by MECO of the cost of providing new peaking generating facilities to meet increases in peak demand, and the cost of providing new baseload or combined cycle generating facilities to meet increases in baseload requirements.

COM-Companies-SOP-IR-12

Page 22, Avoided Utility System Costs: Provide the most recent marginal cost of service study prepared on the MECO system showing marginal generation, transmission, and distribution capacity costs, and marginal energy costs.

COM-Companies-SOP-IR-13

Page 22, Avoided Utility System Costs: Provide any studies done by MECO of the generation, transmission, and distribution capacity cost savings that may be achieved through the use of distributed renewable resources in the residential sector, such as solar water heating systems or storage water heating system, including any analysis of the benefits of timers or interruptibility of these systems.

COM-Companies-SOP-IR-14

Page 30, Recovery of Standby Demand Costs from DG Owners: Provide the most recent fully allocated cost of service study prepared by MECO, and the most recent cost of service study for the MECO system prepared by any other party to a MECO rate proceeding, including any associated workpapers showing the inter-island and/or inter-class subsidies that MECO and other parties believe are reflected in current MECO rates.

COM-Companies-SOP-IR-15

Page 38, Sole Sourcing to Hess: Do other manufacturers or vendors offer CHP systems that are skid-mounted, pre-wired, pre-piped, factory-tested and UL approved that are substantially equivalent to those offered by Hess?

COM-Companies-SOP-IR-16

Page 38, Sole Sourcing to Hess: Provide any analysis done by the Companies in determining to sole-source its offering to Hess.

COM-Companies-SOP-IR-17

Page 39, Sole Sourcing to Hess: Provide a list of the "circumstances where the standard Hess Microgen offering does not meet the needs of the customer" and sufficient discussion of each to understand what the issues were for that customer.

COM-Companies-SOP-IR-18

Page 28, Interconnection: Provide a list of all known existing customer-owned generation that is synchronous to the MECO system, indicating the size of each generating unit, the fuel type, heat rate (if known), whether stand-alone or CHP, and location on the system.

DATED: Wailuku, Maui, Hawaii, May 21, 2004.

BRIAN T. MOTO  
Corporation Counsel  
Attorney for Intervenor  
COUNTY OF MAUI

By *Cindy Y. Young*  
CINDY Y. YOUNG  
Deputy Corporation Counsel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was duly served upon the following by the manner indicated hereinbelow on May 21, 2004, addressed as follows:

	METHOD OF SERVICE
	<u>MAIL</u> <u>HAND-DELIVER</u>
DIVISION OF CONSUMER ADVOCACY DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS 335 Merchant St., Rm. 326 Honolulu, HI 96813	XX
THOMAS W. WILLIAMS, JR., ESQ. PETER Y. KIKUTA, ESQ. Goodsill, Anderson, Quinn & Stifel Alii Place, Ste. 1800 1099 Alakea St. Honolulu, HI 96813 Attorneys for HAWAIIAN ELECTRIC COMPANY, INC. HAWAII ELECTRIC LIGHT COMPANY, INC. MAUI ELECTRIC COMPANY, LIMITED	XX
WILLIAM A. BONNET, Vice-President Hawaiian Electric Company, Inc. Hawaii Electric Light Company, Inc. Maui Electric Company, Limited P.O. Box 2750 Honolulu, HI 96840-0001	XX
PATSY H. NANBU Hawaiian Electric Company, Inc. P.O. Box 2750 Honolulu, HI 96840-0001 <b>For hand delivery:</b> 220 S. King St., Ste. 1301 Honolulu, HI 96813	XX
ALAN M. OSHIMA, ESQ. KENT D. MORIHARA, ESQ. Oshima, Chun, Fong & Chung LLP Davies Pacific Center 841 Bishop St., Ste. 400 Honolulu, HI 96813 Attorneys for KAUAI ISLAND UTILITY COOPERATIVE	XX

METHOD OF SERVICE  
MAIL                      HAND-DELIVER

ALTON MIYAMOTO  
President & CEO  
Kauai Island Utility Cooperative  
4463 Pahe'e St.  
Lihue, HI 96766

XX

GEORGE T. AOKI, ESQ.  
The Gas Company, LLC  
P.O. Box 3000  
Honolulu, HI 96802-3000  
**For hand-delivery:**  
Topa Fort St. Financial Tower  
745 Fort St., 18th Floor  
Honolulu, HI 96813  
Attorney for THE GAS COMPANY, LLC

XX

STEVEN P. GOLDEN  
The Gas Company  
P. O. Box 3000  
Honolulu, HI 96802-3000  
**For hand-delivery:**  
Topa Fort St. Financial Tower  
745 Fort St., 18th Floor  
Honolulu, HI 96813

XX

GAIL S. GILMAN  
The Gas Company  
P.O. Box 3000  
Honolulu, HI 96802-3000  
**For hand-delivery:**  
Topa Fort St. Financial Tower  
745 Fort St., 18th Floor  
Honolulu, HI 96813

XX

KALVIN K. KOBAYASHI, Energy Coordinator  
Department of Management  
County of Maui  
200 South High St.  
Wailuku, HI 96793

XX

WARREN S. BOLLMEIER, II, President  
Hawaii Renewable Energy Alliance  
46-040 Konane Pl., #3816  
Kaneohe, HI 96744  
Attorney for  
HAWAII RENEWABLE ENERGY ALLIANCE

XX

JOHN CROUCH  
Box 38-4276  
Waikoloa, HI 96738

XX

METHOD OF SERVICE  
MAIL                      HAND-DELIVER

RICK REED Inter Island Solar Supply 761 Ahua St. Honolulu, HI 96819	XX
HENRY Q. CURTIS Vice President for Consumer Issues Life of the Land 76 North King St., Ste. #203 Honolulu, Hawaii 96817	XX
SANDRA-ANN Y.H. WONG, ESQ. 1050 Bishop St., #514 Honolulu, HI 96813 Attorney for HESS MICROGEN, LLC	XX
CHRISTOPHER S. COLMAN, ESQ. Deputy General Counsel Amerada Hess Corporation One Hess Plaza Woodbridge, NJ 07095	XX
MICHAEL DE'MARSI Hess Microgen 4101 Halburton Rd. Raleigh, NC 27614	XX
THOMAS C. GORAK Gorak & Bay, LLC 76-6326 Kaheiau St. Kailua-Kona, HI 76740-3218 Attorney for JOHNSON CONTROLS, INC.	XX
GORDON BULL, Branch Manager Johnson Controls, Inc. 3526 Breakwater Court Hayward, CA 94545	XX
JIM REISCH Vice-President & General Manager Engine Division Pacific Machinery, Inc. 94-025 Farrington Hwy. Waipahu, HI 96797	XX
LANI D.H. NAKAZAWA County Attorney CHRISTIANE L. NAKEA-TRESLER Deputy County Attorney Office of the County Attorney County of Kauai 4444 Rice St., Ste. 220 Lihue, HI 96766-6315 Attorneys for COUNTY OF KAUAI	XX

METHOD OF SERVICE  
MAIL                      HAND-DELIVER

GLENN SATO, Energy Coordinator                      XX  
c/o Office of the County Attorney  
County of Kauai  
4444 Rice St., Ste. 220  
Lihue, HI 96766

JOHN W.K. CHANG    XX  
Deputy Attorney General  
Department of the Attorney General  
State of Hawaii  
425 Queen St.  
Honolulu, HI 96813

MAURICE H. KAYA, P.E.                                      XX  
Chief Technology Officer  
DBEDT-Strategic Industries Division  
P.O. Box 2359  
Honolulu, HI 96804  
**For hand-delivery:**  
235 S. Beretania St., Rm. 502  
Honolulu, HI 96813

STEVEN ALBER, Energy Analyst                              XX  
DBEDT-Strategic Industries Division  
P.O. Box 2359  
Honolulu, HI 96804  
**For hand-delivery:**  
235 S. Beretania St., Rm. 500  
Honolulu, HI 96813

DATED: Wailuku, Maui, Hawaii, May 21, 2004.

BRIAN T. MOTO  
Corporation Counsel  
Attorney for Intervenor  
COUNTY OF MAUI

By Cindy Y. Young  
CINDY Y. YOUNG  
Deputy Corporation Counsel