

5-21-04

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

2004 MAY 21 A 11:58

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	PUBLIC UTILITIES COMMISSION)	DOCKET NO. 03-0371
)	
	Instituting a Proceeding to Investigate)	
	Distributed Generation in Hawaii)	
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INFORMATION REQUESTS TO ALL DG DOCKET PARTIES

OF

HAWAII RENEWABLE ENERGY ALLIANCE

AND

CERTIFICATE OF SERVICE

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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

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PUBLIC UTILITIES COMMISSION) DOCKET NO. 03-0371
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Instituting a Proceeding to Investigate)
Distributed Generation in Hawaii)
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I. INTRODUCTION AND SUMMARY

The Hawaii Renewable Energy Alliance hereby submits Information Requests (IRs) dated May 21, 2004 to the Parties as included below, in accordance with Public Utilities Commission’s (PUC’s) Prehearing Order Number 20922 (Reference Docket No. 03-0371).

II. HREA INFORMATION REQUESTs

HREA’s Information Requests are listed below by Party. Note: page number notations are references to the relevant Party’s Preliminary Statement of Position (SOP).

A. Division of Consumer Advocacy (“CA”)

HREA-CA-IR-1. On pages 5 and 6 of the CA’s SOP, the CA discusses the technologies believed to be feasible and viable in Hawaii. Would the CA agree that technology viability will be determined by the market, and especially a competitive market in which there is a level playing field and all barriers to market entry are removed?

HREA-CA-IR-2. On page 8, how does the CA define “firm” capacity and a “dispatchable resource”?

HREA-CA-IR-3. On page 8, would the CA support including net metering electricity as an energy offset in our RPS law?

HREA-CA-IR-4. On page 9, please clarify the statement: “When available, however, their energy can be absorbed by the electric utility system if the amount of generation is a

1 small percentage of the electric utility generating source.” For example, there are examples
2 of wind penetration on island grids, such as St. Paul Island, Alaska (See
3 <http://www.northernpower.com/template.php?t=7&g=22&c=122>), where the instantaneous
4 supply of wind-generated electricity can be 100% of the load.

5 HREA-CA-IR-5. On page 9, would the CA agree that a non-utility DG could be relied on
6 as a reliable energy (and capacity) source for the electric utility, if the non-utility DG had an
7 interconnection/power purchase agreement with the utility that specified a schedule of the
8 DG’s operation and/or delivery of capacity/energy to the utility?

9 HREA-CA-IR-6. On page 18, please explain the CA’s following statement: “So, wind
10 might have a benefit to meeting customer energy needs, but little benefit to the Electric
11 Utility Companies delivery systems.” HREA can think of several benefits, including providing
12 capacity when they are on-line, improving system reliability, helping the utilities meet their
13 RPSs, and staying on-line during utility faults to help protect the utility system.

14 HREA-CA-IR-7. On page 19 (last paragraph), is the CA concerned about the net impact
15 of the air emissions from multiple fossil DG units?

16 HREA-CA-IR-8. On page 20, we do not understand the CA’s reference to the
17 “unbundled rates” that would be implemented in conjunction with DG. Would not the
18 Customer compare and make his decision based on the cost of a DG with respect to the
19 retail rate that he is paying?

20 HREA-CA-IR-9. On page 26, the CA discusses issues regarding planning for DG in
21 IRP. Would the CA agree that planning for DG in IRP is dependent on how the DG is to be
22 implemented and should not alternate implementation strategies be evaluated as part of
23 IRP? For example, the utility typically plans for power plants as if they would be constructed
24 and operated by the utility. We argue that approach would give you one answer as to the
25 types of DG and their associated costs and performance characteristics that would go into

1 the IRP, whereas a utility solicitation for bids from customer-sited DG, provided by third
2 Parties, could give quite a different answer.

3 HREA-CA-IR-10. In the case where a utility is experiencing load growth, would the CA
4 agree that the maximum benefit to the ratepayers would occur if DG investments and fuel
5 costs were not rate-based?

6 HREA-CA-IR-11. As a follow-up to HREA-CA-IR-10, would the CA support DG
7 implementation in the following manner? The regulated utility specifies areas and amounts
8 of desired DG (including CHP) in IRP, and then solicits (in a competitive bidding process)
9 for DG proposals from potential DG customers and ONLY non-utility energy service
10 providers. Specifically, only an unregulated utility entity would be allowed to compete with
11 other non-utility entities. If not, why not?

12 **B. Kauai Island Cooperative Utility (KIUC)**

13 HREA-KIUC-IR-1 (Planning: Issue #1). On pages 6 to 8 of KIUC's SOP, KIUC
14 discusses the feasibility and viability of DG for Hawaii. Would KIUC agree that feasibility and
15 viability will be determined by the market, and especially one that is competitive and has a
16 level playing field, and all barriers to market entry are removed? If not, why not?

17 HREA-KIUC-IR-2 (Planning: Issue #2). On page 9, KIUC expresses concerns about
18 potential loss revenues due to non-utility owned DG. Would KIUC agree that revenue losses
19 would be eliminated or minimized in the case where a utility is experiencing load growth? If
20 not, why not?

21 HREA-KIUC-IR-3 (Planning: Issue #3). Referencing page 10, is it KIUC's position that a
22 generic case can not be made for the benefits of DG? If so, why not?

23 HREA-KIUC-IR-4 (Planning: Issue #3). On page 11 and later on page 14 (Impact: Issue
24 9), KIUC indicates there are potential risks, including a failure to gain anticipated DG
25 benefits, if there is an extensive or non-controlled infusion of DG. Would KIUC agree,

1 therefore, that DG should be planned in IRP, and, specifically, that areas for DG
2 development should be identified for implementation? If not, why not?

3 HREA-KIUC-IR-5 (Impact: Issue 6). Referencing page 12, could KIUC provide an
4 example to illustrate why DG would result in minimal savings due to small reductions in
5 transmission line losses?

6 HREA-KIUC-IR-6 (Impact: Issue 7). On pages 12 to 13, items (b) to (d) are listed by
7 KIUC has potential externalities costs and benefits from DG. Could KIUC comment on why
8 these items are externalities (i.e., those costs and benefits that are not presently accounted
9 for in our current energy transactions)?

10 HREA-KIUC-IR-7 (Implementation: Issue 9). Referencing page 16, paragraph (e),
11 would KIUC's concerns about potential degradations to their system be mitigated if DG were
12 required to meet IEEE-1547 and other appropriate standards?

13 HREA-KIUC-IR-8 (Implementation: Issue 10). Referencing page 18, does HREA
14 understand correctly that KIUC is proposing to install a CHP DG at a customer's site,
15 charge the customer the retail rate appropriate to the customer's class of service, and then
16 allow the customer to benefit from the free use of the waste heat component of the CHP, in
17 exchange for free rental of DG facility site on the customer's premises? Given this
18 approach, would KIUC be willing to partner with non-KIUC energy service providers for
19 installation, operation and maintenance of the DG facility?

20 HREA-KIUC-IR-9 (Implementation: Issue 10). As a follow-up to HREA-KIUC-IR-9,
21 would KIUC support DG implementation in the following manner. KIUC specifies areas and
22 amounts of desired DG and then solicits (in a competitive bidding process) for DG
23 proposals from potential DG customers and ONLY non-KIUC energy service providers? If
24 not, why not?

1 **C. Hawaiian Electric Company, Maui Electric Company and Hawaii Electric Light**
2 **Company (“HECO”)**

3 HREA-HECO-IR-1 (Planning: Issue 1). Referencing page 1 of HECO’s SOP, why
4 should DG be only price competitive in the short-term and not also in the long-term, and
5 what fuel does HECO consider to be sustainable in the long-term?

6 HREA-HECO-IR-2 (Planning: Issue 1). Referencing page 2, has HECO conducted any
7 studies to compare the emissions per MWH of Internal Combustion Engines (ICEs) used as
8 DG with conventional utility generators? If so, what were the results of the study?

9 HREA-HECO-IR-3 (Planning: Issue 1). On page 6, HECO states: “In order for DG to be
10 accepted in Hawaii, it must be highly efficient (such as CHP systems) and the application
11 must be large enough for a reasonable economy of scale.” Is this conclusion based on
12 HECO’s estimate of what it would cost the Company to install, own and operate fossil CHP?

13 HREA-HECO-IR-4 (Planning: Issue 2). Referencing page 7, does HREA understand
14 correctly that application (4) would be for a CHP that would off-set a portion up to all of the
15 customer’s load, whereas application (7) would be the same as (4), but with the option of
16 exporting electricity to the grid?

17 HREA-HECO-IR-5 (Planning: Issue 2). Referencing page 8 (second full paragraph), in
18 the case of utility ownership of CHP, to whom would the CHP systems be cost-effective?
19 What does cost-effective mean in this case? Also, does the phrase “does not burden non-
20 participating customers” mean that there would be no rate impacts?

21 HREA-HECO-IR-6 (Planning: Issue 2). Referencing page 10 (first bullet in the first full
22 paragraph), how would the “interests of all customers be taken into consideration?”

23 HREA-HECO-IR-7 (Planning: Issue 2). Referencing page 11, regarding HECO’s claim
24 that “utility participation in the DG/CHP market can help to create a bigger DG/CHP market,”
25 what is the basis for the statement that “There is broad-based customer support for a utility
26 CHP program?”

1 HREA-HECO-IR-8 (Planning: Issue 2). Referencing the last sentence on page 12,
2 HREA does not understand how HECO would not be in the equipment sales business if
3 they were to supply utility-owned DG to customers. Please explain. On the other hand, if
4 HECO really wanted to facilitate customer choice and assist customers in making decisions
5 regarding DG, would not it be better for all customers if HECO were to encourage DG via a
6 Demand-Side Management (DSM) program (s), such as the highly-successful Residential
7 Efficient Water Heating (REWH) program? If not, why not?

8 HREA-HECO-IR-9 (Planning: Issue 3). Referencing the last paragraph on page 14,
9 please explain why HECO is against using customer-sited emergency generation in parallel
10 with the utility grid (i.e., application 7 as noted previously)?

11 HREA-HECO-IR-10 (Planning: Issue 3). Referencing the first paragraph on page 15,
12 HECO refers to the utility's role to develop and enforce interconnection standards, which are
13 reviewed and approved by the PUC. Does HECO support collaborative development of
14 interconnection standards with industry? If not, why not?

15 HREA-HECO-IR-11 (Planning: Issue 3). Referencing the second paragraph on page
16 15, please clarify "the utility's role to design and obtain approval for utility tariff provisions
17 that ensure that utility customers will not be unduly burdened by the provision of utility back-
18 up service to customers with customer-sited CHP systems or DG."

19 HREA-HECO-IR-12 (Impact: Issue 4). On page 16, HECO discusses the impacts of DG
20 on Hawaii's transmission and distribution ("T&D"). Would it be correct to view DG as
21 "negative loads?" Therefore, assuming that a DG is to be installed per an agreed-upon
22 interconnection standard, would it be correct to conclude that the load-carrying
23 requirements on the line feeding the DG customer would be reduced? Please clarify then
24 why assessing the "impact of DG on Hawaii's transmission and distribution ("T&D") is
25 complex and requires detailed studies of on a case-by-case basis?"

1 HREA-HECO-IR-13 (Impact: Issue 5). On pages 18 to 19, HECO discusses DG
2 interconnection requirements and the HECO interconnection standard for DG (Rule 14 H).
3 HREA believes that this rule may need to be revised on account of the DG Docket. Would
4 HECO support a collaborative effort to discuss and prepare revisions to Rule 14 H?

5 HREA-HECO-IR-14 (Impact: Issue 5). On page 19 (discussion of adverse impacts on
6 system reliability, first bullet), HECO states that “all DG units must be backed up by the
7 grid.” Would HECO agree that this statement would not be true if DG customers did not
8 require back-up from the utility? If not, why not?

9 HREA-HECO-IR-15 (Impact: Issue 5). On page 19 (discussion of adverse impacts on
10 system reliability, second bullet), would HECO still have this concern if the DG interconnect
11 agreement required the DG owner/operator to: (1) provide and update HECO with the
12 operational schedule of the DG facility, and (2) provide a data line to HECO for monitoring
13 the operation of the DG facility? If this is not sufficient to address HECO’s concerns, what
14 other requirements does HECO think would be appropriate?

15 HREA-HECO-IR-16 (Impact: Issue 6). Referencing the last sentence on page 22,
16 please provide an example of how “In the case of utility-owned CHP systems, all of these
17 factors can be taken into account so that non-participating customers are not burdened by
18 the offering of such services.”

19 HREA-HECO-IR-17 (Impact: Issue 7). On pages 23 to 24, HECO lists a number of
20 “positive and negative DG externalities”. Given that externalities are those costs and
21 benefits that are not presently accounted for in our current energy transactions, why are the
22 first and third bullets (on the positive externalities list) externalities? Specifically, in bullets 1
23 and 3, the DG owner would be paying for the described benefits, whereas the avoidance of
24 fossil emissions (bullet 2) are externalities that are being accounted for only in part, e.g.,
25 emissions fees on SOx and NOx, but not CO2.

1 HREA-HECO-IR-18 (Impact: Issue 8). Referencing the first paragraph on page 26,
2 HECO states that “forecasted load growth is much higher than can be met with distributed
3 generation alone, given the relatively small scale of distributed generation systems.” Does
4 HREA understand correctly that this statement is based on a HECO study of the DG
5 market? If so, please provide a copy of the market study to HREA?

6 HREA-HECO-IR-19 (Implementation: Issue 10). In the next to last paragraph on page
7 31, HECO discusses the impacts of DG on the existing cost-of-service for residential vs.
8 other classes, e.g., large power and commercial. Currently, HREA understands that the
9 rate-of-return on residential accounts is less than that for commercial accounts. HECO
10 states that: “This benefits the residential class, but only as long as large commercial
11 customers do not leave the system because of rates that are higher due to the subsidy.” Is
12 it correct to assume that commercial DG customers would “leave the system?” Would not
13 commercial DG customers remain interconnected with the grid?

14 HREA-HECO-IR-20 (Implementation: Issue 11). On page 33, HECO states that no
15 changes are needed to the IRP process. Would HECO agree that implementation of DG
16 would benefit from the utility specification in IRP of areas and amounts of DG that would
17 provide positive impacts to the utility system, e.g., to reduce line losses, off-set new T&D
18 upgrades and defer generation?

19 HREA-HECO-IR-21 (Implementation: Issue 13). Referencing page 35, HREA cannot
20 support the Companies’ proposed CHP program and CHP tariff, in part, as it would
21 perpetuate increased utility rates when the utility makes new investments and continues to
22 pass through fuel costs. Would it not be better for the ratepayer, if DG investments and fuel
23 purchases were not rate-based?

1 **D. Hess Microgen (“Hess”)**

2 HREA-HESS-IR-1 (Planning: Issue 3). On page 3 of Hess’s SOP, Hess states: “The
3 role of the regulated electric utility companies (“utilities”) should be the same as private
4 companies that are competing to deploy DG to customers.” Based on this statement, is it
5 correct to assume that Hess believes it will NOT be at a competitive disadvantage, if it has
6 to compete directly with HECO? Please explain.

7 HREA-HESS-IR-2. On page 5 (Impact: Issue 2), Hess indicates that most their CHP
8 facilities are designed to operate 7800 hours a year. This translates to about 89% of the
9 time. What would an average capacity factor for a typical CHP be?

10 HREA-HESS-IR-3. On page 6 (Impact: Issue 2), in the first full paragraph, Hess
11 indicates that a DG unit that does not feedback electricity to the grid will not have a negative
12 impact to the grid. Is this true? For example, if the unit was not operating properly, would
13 not it be possible for the unit to drag down the line voltage?

14 HREA-HESS-IR-4. On page 9 (Implementation: Issue 1), with respect to the National
15 Interconnection Standard IEEE 1547, would Hess agree that HECO’s Rule 14 H comports
16 with IEEE 1547? If not, why not?

17 HREA-HESS-IR-5. On page 10 (Implementation: Issue 4), in IRP would Hess agree
18 that implementation of DG would benefit from the utility specification of areas and amounts
19 of DG that would provide positive impacts to the utility system, e.g., to reduce line losses,
20 off-set new T&D upgrades and defer new generation?

21 **E. The Gas Company (“TGC”)**

22 HREA-TGC-IR-1 (Impact: Issue 4). Referencing page 6 of TGC’s SOP₁, does HREA
23 understand correctly that TGC is not taking a position on whether DG will have a positive
24 impact on the utility’s T&D systems, e.g., to reduce line losses, off-set T&D upgrades and
25 defer and/or offset new generation?

1 HREA-TGC-IR-2 (Implementation: Issue 11). Referencing page 9, in IRP would TGC
2 agree that implementation of DG would benefit from the utility specification of areas and
3 amounts of DG that would provide positive impacts to the utility system, e.g., to reduce line
4 losses, to off-set new T&D upgrades, and defer offset new generation?

5 HREA-TGC-IR-3 (Implementation Issue 11). As follow-up to HREA-TGC-IR-2, would
6 TGC support implementation of a CHP via a competitive bidding process with potential DG
7 customers and ONLY non-utility energy service providers? Specifically, only an unregulated
8 utility entity would be allowed to compete with other non-utility entities? If not, why not?

9 **F. Pacific Machinery Inc. ("PMI")**

10 HREA-PMI-IR-1. Is PMI going to prepare a SOP?

11 **G. Johnson Controls, Inc. ("JCI")**

12 HREA-JCI-IR-1 (Executive Summary and Implementation Issues). Referencing pages 4
13 and 20 to 21 of JCI's SOP, HREA understands that JCI's position includes development of
14 reasonable interconnection standards. Does JCI consider HECO's Tariff 4 H to be
15 reasonable? If not, why not?

16 HREA-JCI-IR-2 (Executive Summary and Implementation Issues). As a follow-up to
17 HREA-JCI-IR-1, would JCI support the collaborative development of revised interconnection
18 standards for DG?

19 HREA-JCI-IR-3 (General Statement of Position). Referencing the discussion on pages 6
20 and 7, would JCI support the utility specification in IRP of areas and amounts of DG that
21 would provide positive impacts to the utility system, e.g., to reduce line losses, off-set new
22 T&D upgrades and defer generation?

23 HREA-JCI-IR-4 (General Statement of Position). Referencing the discussion on page 9
24 and as a follow-up to HREA-JCI-IR-3, would JCI support implementation of a DG (including
25 CHP) via a competitive bidding process with potential DG customers and ONLY non-utility

1 energy service providers? Specifically, only an unregulated utility entity would be allowed to
2 compete with other non-utility entities. If not, why not?

3 **H. Life of the Land (“LOL”)**

4 HREA-LOL-IR-1 (Introduction). Referencing page 5 of LOL’s SOP, HREA understands
5 the concepts of LOL’s basic discussion of Imports, Exports and Economic Development. As
6 a clarification, when LOL calculates imports and exports, is LOL including the outside
7 investment coming to Hawaii (build new hotels/resorts or windfarms, etc.) and Hawaii
8 investment elsewhere (Hawaii financial institutions, pension plans, the large estates, etc.,
9 invest outside of Hawaii)? Does LOL have an estimate of what the import/export ratio would
10 be for that case?

11 HREA-LOL-IR-2 (Introduction). Referencing LOL’s discussion on page 9 on correlation,
12 would it be correct to say that LOL’s argument with respect to renewables would be true if
13 we decoupled the price of renewables from oil? Specifically, would LOL agree that LOL’s
14 arguments do not apply if we continue to price renewable according to the PURPA (Public
15 Utility Regulatory Policy Act) of 1978?

16 HREA-LOL-IR-3 (Introduction). Referencing LOL’s discussion on page 15 regarding
17 global warming, LOL has presented yet another take on why we need to take action to
18 mitigate the effects of global warming. However, since we have failed in previous attempts
19 in Hawaii to the quantify the externalities of global warming, does LOL have something
20 specific to propose as part of this docket?

21 HREA-LOL-IR-4. Referencing LOL’s definition on page 19 regarding of “Outages,” is
22 LOL implying that catastrophic outages cannot be man-made or caused? Catastrophic
23 would seem to be a measure of the extent of an outage and the element of suddenness or
24 surprise, not its cause. Furthermore, if one is seeking to blame power outages on factors
25 that relate to extreme weather (high temperatures, lightning, hurricanes, etc), whether we

1 attribute it to a deity initially or not, would LOL agree that there is now a persuasive
2 argument that man is contributing to more severe weather?

3 HREA-LOL-IR-5. As a follow-up to HREA-LOL-IR-5, HREA would agree that outage
4 data can lead to one or more metrics (or methodologies of estimating or calculating) of
5 reliability. Keeping in mind that reliability is the probability of a given event happening or not
6 happening (Reference HREA's SOP), the one reliability metric that might be of most relevance
7 would be the "loss-of-load probability." In that case, would LOL agree that the customers
8 loss of power would be highly correlated to loss of load, and hence reliability?

9 HREA-LOL-IR-6. Referencing LOL's definition on page 20 of "Intra-Government
10 Wheeling," would LOL agree that the concept of wheeling (retail or otherwise) could also be
11 between an agency's location to another location of the same agency?

12 HREA-LOL-IR-7 (Planning: Issue 1). Referencing LOL's definition on page 20 of "real
13 renewables," HREA is curious why LOL did not include biomass, geothermal, hydro (falling
14 water), ocean current, and ocean thermal (use of differential water temperatures) in your
15 definition of "real renewables" (resources)? We also assume by "moon" you are referencing
16 to harnessing ocean and sea tides?

17 HREA-LOL-IR-8 (Planning: Issue 2). Referencing LOL's discussion on page 22
18 regarding funding of the PUC, given that the PUC doesn't spend all the revenues that it
19 acquires annually, would LOL agree that taxing Independent Power Producers (IPPs) might
20 not be needed or that IPPs could be taxed at a lower rate than the T&D company?

21 **I. County of Maui ("COM")**

22 HREA-COM-IR-1. On page 3 (Section 3) of the COM's SOP, the COM discusses DG
23 Due Diligence Reviews. Is the COM suggesting that these reviews be conducted as part of
24 the utilities' IRP? If not, why not?

25 HREA-COM-IR-2. As a follow-up to HREA-COM-IR-1, would the COM support the utility
26 specification in IRP of areas and amounts of DG that would provide positive impacts to the

1 utility system, e.g., to reduce line losses, off-set new T&D upgrades and defer generation?

2 If not, why not?

3 HREA-COM-IR-3. As a follow-up to HREA-COM-IR-2 and to the COM's discussion of
4 the utility's role as a market facilitator on page 4, would the COM support implementation of
5 DG, including CHP, via a competitive bidding process with potential DG customers and
6 ONLY non-utility energy service providers? Specifically, only an unregulated utility entity
7 would be allowed to compete with other non-utility entities. If not, why not?

8 **J. County of Kauai ("COK")**

9 HREA-COM-IR-1. Would the COM support KIUC's specification in IRP of areas and
10 amounts of DG that would provide positive impacts to the utility system, e.g., to reduce line
11 losses, off-set new T&D upgrades and defer generation? If not, why not?

12 HREA-COM-IR-2. As a follow-up to HREA-COM-IR-1 would the COK support KIUC's
13 facilitation of the DG market, including CHP, by implementation of DG (based on the IRP
14 results) via a competitive bidding process with potential DG customers and ONLY non-KIUC
15 energy service providers? If not, why not?

16 **K. Department of Business, Economic Development and Tourism ("DBEDT")**

17 HREA-DBEDT-IR-1. Referencing pages 5 to 6 of DBEDT's SOP (Implementation: Issue
18 9), DBEDT discusses Interconnection Standards and Interconnection Agreements for DG.
19 Would DBEDT support the collaborative development of revised interconnection standards
20 for DG in Hawaii?

21 HREA-DBEDT-IR-2. Referencing page 8 (Planning: Issue 2), DBEDT states: "DBEDT
22 believes that electric utility customers/end users, energy service companies/DG vendors,
23 and the electric utilities should be allowed to own and operate DG projects. DBEDT
24 supports a level play in field when it comes to DG ownership and operations relative to the
25 utilities, which could also complement their marketing of energy efficiency measures."

1 DBEDT discusses this issue further on pages 9 to 10, regarding the role of the regulated
2 electric utility in the deployment of DG in Hawaii. Would not a regulated utility entity have
3 an unfair competitive advantage over non-utility entities wishing to supply DG products and
4 services? If not, why not?

5 HREA-DBEDT-IR-3. As a follow-up to HREA-DBEDT-IR-3, would DBEDT support the
6 following approach to planning and implementing DG, including CHP, in Hawaii? The
7 regulated utility specifies areas and amounts of desired DG (including CHP) in IRP and then
8 solicits (in a competitive bidding process) for DG proposals from potential DG customers
9 and ONLY non-utility energy service providers. Specifically, only an unregulated utility entity
10 would be allowed to compete with other non-utility entities. If not, why not?

11 HREA-DBEDT-IR-4 (General Question). HREA understands that DBEDT is in the
12 process of completing a study of DG in Hawaii. Are there any preliminary results regarding
13 the potential market for DG in Hawaii, and any other relevant information, that could be
14 made available at this time?

15 *****

16 END OF INFORMATION REQUESTS

17 *****

18 DATED: May 21, 2004, Honolulu, Hawaii

19 
20 President, HREA

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Preliminary Statement of Position upon the following parties by causing a copy hereof to be hand-delivered or mailed, postage prepaid, and properly addressed the number of copies noted below to each such party:

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Dated: May 21, 2004


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