



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

----- In the Matter of ----- ) PUC Docket No. 03-0371  
)  
)  
PUBLIC UTILITIES COMMISSION )  
)  
Instituting a Proceeding to Investigate )  
Distributed Generation In Hawaii )  
)

**I. INTRODUCTION**

The Hawaii Renewable Energy Alliance (“Movant”) hereby moves the Hawaii Public Utilities Commission (“Commission”) for an order allowing Movant to intervene as a party in this Docket for Instituting a Proceeding to Investigate Distributed Generation (DG) in Hawaii.

**II. MOTION TO INTERVENE OF THE HAWAII RENEWABLE ENERGY ALLIANCE**

**BACKGROUND**

The Hawaii Renewable Energy Alliance (HREA) is a Hawaii-based, private, non-profit corporation, exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986, composed of developers, manufacturers, distributors, scientists, engineers, and advocates in renewable energy. Individual HREA members were intervenors in PUC Docket No. 94-0226 (Renewable Energy) and in the first two rounds of HECO’s IRP, including the Externalities Working Group, Supply-Side and DSM Advisory Committees. HREA was an intervenor in PUC Docket No. 96-0493 (Electric Competition, Including an investigation of the Electric Utility Infrastructure in the State of Hawaii). HREA is a current intervenor in PUC Docket No.

99-0004 (MECO IRP – 2000 to 2020). Accordingly, the HREA has a substantial and continuing interest in the subject of renewable energy in the electric utility sector. Furthermore, since there are renewable types of DG<sup>1</sup>, such as individual wind turbines, small clusters of wind turbines and windfarms, concentrating solar power and photovoltaics, biomass cogeneration, combustion and gasification, and hydropower, Thus, HREA has a substantial and continuing interest in DG.

HREA has also filed a motion to intervene in PUC Docket No. 03-0366 on Combined Heat and Power (CHP). HREA observes that CHP is a type of DG, and that the issues and potential resolutions for CHP and DG are similar. Thus, we support consolidating the two Dockets into one.

#### ARGUMENT

Pursuant to Hawaii Revised Statutes Section 269-6 and Sections 6-61-41 and 6-61-55, Rules of Practice and Procedure before the Public Utilities Commission, Chapter 61, of Title 6 of the Hawaii Administrative Rules, Movant states the following in support of its motion:

1. Nature of Movant's Statutory or other Right to Participate in this Proceeding.

By opening this Docket, the Commission has invited all interested electric service providers, organizations, business groups and community groups to participate in this docket as intervenors or participants.

Petitioner is an "organization" within the meaning of the invitation.

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<sup>1</sup> Per PUC Order No. 20582, "Distributed generation involves the use of small scale electric generating technologies installed at, or in close proximity to, the end-user's location."

2. The Nature and Extent of the Applicant's Property, Financial, and Other Interest in the Pending Matter.

Member organizations and individuals are owners, employees, consultants or agents involved in and/or considering electrical generation, including DG, and are concerned about access to the market and other issues. Accordingly there are substantial financial and other interests implicated in this docket.

3. Effect of Pending Order upon Movant's Interest.

See #2 above.

4. Other Means by Which the Movant's Interest may be Protected.

None

5. Extent to Which Movant's Interest will be Represented by Other Parties.

None. For example, the utilities and the Consumer Advocate cannot adequately represent the interests of HREA and its individual members.

6. Extent to Which Movant Can Assist in the Development of a Sound Evidentiary Record.

The resources, expertise and time necessary for individual members to effectively participate in this process require effective and professional coordinated representation. The HREA will provide such representation for its members.

7. Extent to Which Movant's Participation will Broaden the Issues or Delay the Proceeding

None

8. Extent to Which Movant's Interest from the General Public

See #2 above.

9. Whether the applicant's position is in support of or in opposition to the relief sought

HREA supports DG in principle, and specifically its application on our electric grids. DG has the potential to help reduce our dependence on imported fossil energy and protect the environment. We believe that DG should be implemented in an innovative and competitive manner to provide reliability, high quality power to customers at the lowest possible cost.

CONCLUSION

Based on the foregoing, Movant respectfully requests the Commission to grant Movant's Motion to Intervene.

DATED: November 6, 2003, Honolulu, Hawaii

  
Alan S. Ballman, President

CERTIFICATE OF SERVICE

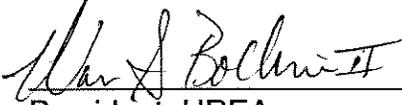
I hereby certify that I have this day served the foregoing Motion to Intervene upon the following parties by causing a copy hereof to be hand-delivered or mailed, postage prepaid, and properly addressed the number of copies noted below to each such party:

ACTING EXECUTIVE DIRECTOR, CHERYL KIKUTA  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS  
DIVISION OF CONSUMER ADVOCACY  
P O BOX 541  
HONOLULU HI 96809

Number of Copies: 2

WILLIAM A. BONNET  
VICE-PRESIDENT, GOVERNMENTAL AND COMMUNITY AFFAIRS  
HAWAIIAN ELECTRIC COMPANY INC  
P O BOX 2750  
HONOLULU HI 96840-0001

Number of Copies: 1

  
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President, HREA