11-1-04

FILED
2004 NOV -1 P 4:05
PUBLIC UTILITIES COMMISSION

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	)	
	)	

INFORMATION REQUESTS ON REBUTTAL TESTIMONIES OF VARIOUS PARTIES

OF

HAWAII RENEWABLE ENERGY ALLIANCE

AND

CERTIFICATE OF SERVICE

Warren S. Bollmeier II, President
HREA
46-040 Konane Place #3816
Kaneohe HI 96744

(808) 247-7753

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	)	
	)	
	)	

I. INTRODUCTION AND SUMMARY

The Hawaii Renewable Energy Alliance hereby submits Information Requests (IRs) dated November 1, 2004 to the Parties and Active Participants as included below, in accordance with Public Utilities Commission's (PUC's) Prehearing Order Number 20922 (Reference Docket No. 03-0371), on their Rebuttal Testimonies.

II. HREA INFORMATION REQUESTs

HREA's Information Requests are listed below by Party. Note: page number notations are references to the relevant Party's direct testimonies as identified.

A. Division of Consumer Advocacy ("CA")

The following are information requests to Joseph A. Herz, P. E., regarding his direct testimony (CA-RT-1) on behalf of the CA

HREA-CA-RT-1-IR-1. In the Table on page 11 what is the basis for the DG size limits? Why should there be specific limits as opposed to evaluating the merits of specific projects (over a certain threshold) on a case by case basis?

HREA-CA-RT-1-IR-2. Reference your comments on page 12 (lines 20 to 21), the Commission stated, in order 20582 on the instant docket, that "distributed generation involves the use of small scale electric generating technologies installed at, or in close proximity to, the end-user's location." Would you agree that this could involve resources

located on either side of the customer's utility meter, hence the resources could be supply-side and demand-side by the conventional definitions? Hence, would you agree that it would be too limiting to state that the "Commission's intent to focus on supply-side resources is clear?"

HREA-CA-RT-1-IR-3. On page 14 (lines 4 to 6) are you not considering the County of Maui's proposal to utilize emergency/standby generators as part of the Virtual Power Plant concept? If so, please explain.

HREA-CA-RT-1-IR-4. On page 14 (lines 15 to 17) HREA cannot speak for other Parties, but does the CA understand that the threshold issue from our perspective of this docket is to determine the appropriate role of the utility in the DG market, which is a much broader issue that just utility ownership?

HREA-CA-RT-1-IR-5. On page 19 (lines 6 to 8) HREA cannot speak for other Parties, but does the CA understand that HREA is concerned not only with the creation of a level playing field, but also the potential impacts of DG implementation on ratepayers?

HREA-CA-RT-1-IR-6. On page 20 (lines 5 to 8) does the phrase "not unduly or unreasonably preferential, discriminatory or anti-competitive" include the goal that there should be no rate impacts to non-DG customers? If not, please explain.

HREA-CA-RT-1-IR-7. On page 20 (lines 16 to 18) HREA would agree that KIUC is in a different situation than an investor-owned utility (IOU), and that the economics driving KIUC may be different than that of an IOU. However, it is not clear to us that the KIUC's decisions on behalf of their members will differ significantly with that of an IOU with respect to its shareholders. For example, KIUC has described the potential impacts of DG in terms of a "slower build up of equity, reduced margins and ultimately a reduction in patronage capital retirements to the members." Would you agree that the concern about patronage capital appears to be similar to potential impacts to the shareholders of an IOU? If not, please explain.

HREA-CA-RT-1-IR-8. On page 22 (line 20) to page 23 (line 2) regarding access to customer information, would you agree the utility: (i) has inherent knowledge of its customers and the overall utility system, and (ii) can investigate new technologies and marketing approaches at the expense of the ratepayer, where as a non-utility DG provider: (i) has to acquire the knowledge already resident at the utility, and (ii) pay for its marketing efforts, including the costs of establishing a presence in Hawaii with its own funds? Is not this an example of the utility's market power, and illustrates some of the barriers that third parties have to overcome? If you disagree, please explain. Note: also see page 44 (lines 8 to 10) in which the CA appears to agree that the utility has intimate knowledge of its T&D system.

HREA-CA-RT-1-IR-9. On page 23 (lines 19 to 21) please explain what options that the utility could provide that non-utility DG providers could not.

HREA-CA-RT-1-IR-10. On pages 24 (lines 18 to 21) to page 25, HREA has recommended (as part of the approach whereby unregulated utility affiliates would be allowed to participate in the DG market) that there must be no cross-subsidization of the affiliate from the mother utility? In this section, the CA appears to imply that this would not be possible. Please explain.

HREA-CA-RT-1-IR-11. On page 26 (lines 12 to 20) the CA suggests that non-utility DG would not be reliable. If the utility wishes a specific DG to meet certain reliability and safety requirements, HREA supports including these requirements in DG interconnection agreements. HREA observes that this approach has worked well with Independent Power Producers (IPPs) that have provided reliable and safe power to the utility for many years. Please explain why you don't think this approach would work with DG?

HREA-CA-RT-1-IR-12. As a follow-up to HREA-CA-RT-1-IR-11, is the CA suggesting that the utility be the only one to provide customer-sited DG? Please explain.

HREA-CA-RT-1-IR-13. On page 29 (lines 1 to 30 HREA shares the general concern regarding cross-subsidization of utility-owned (as well as non-utility-owned) customer-sited DG by non-DG utility customers. However, HREA observes that there is already inter-rate class subsidization, e.g., on Oahu, Schedule R, H and F customers are subsidized by Schedule G, J and P. HREA believes this existing cross-subsidization may be a bigger problem, as the current market is not getting the correct price signal. Should not we fix this problem first? If not, please explain.

HREA-CA-RT-1-IR-14. On page 38 (lines 3 to 5) the CA has indicated a potential breakout for the unbundled rate components. Will the potential charges incurred by the DG facility be off-set, in part, by system benefits provided by the DG owner? For example, if the DG facility is non-utility, the facility will be providing capacity to the system.

HREA-CA-RT-1-IR-15. On page 41 (lines 8 to 17) is the CA suggesting that implementation of DG should wait until the need for unbundling of rates has been determined and implemented? Please explain.

HREA-CA-RT-1-IR-16. On page 44 (lines 8 to 15) and referring back to HREA-CA-RT-1-IR-8 (above), HREA would agree that the utility should identify DG needs in the IRP process, and release this information to potential third-party vendors. However, if the utility were allowed to participate directly as a DG provider, the utility would, by virtue of conducting the IRP analysis, possess early knowledge of the desired DG. HREA does not see how this would not give the utility a market advantage. Does the CA agree? Please explain.

HREA-CA-RT-1-IR-17. On page 47 (lines 7 to 15) HREA believes there is only one application that the utility is proposing for DG to support directly its other generating facilities, and that would be a DG at one of the utility's sub-stations. Does the CA believe that is a case where the "competitive procurement process will be extremely important in assuring that all generation, including DG, is implemented within the framework of a lowest,

reasonable cost IRP?" If so, is the CA suggesting, for example, that sub-station DG become part of Docket No. 03-0372, Competitive Bidding on New Generation?" Please explain.

HREA-CA-RT-1-IR-18. On page 48 (lines 10 to 12) HREA does not believe the current approach in IRP will result in the lowest, reasonable costs for providing reliable service, because: (i) the installation and operating costs of resource options are estimates prepared by the utility with input from consultants and IRP advisors, and (ii) the estimates generally are based on the cost for the utility to provide the resource, as opposed to comparing costs for alternative approaches to implementation. HREA believes a better approach would be to acquire costs based on solicitation and review of competitive bids, and, then finalize the 5-year action plan based on lowest-cost acceptable bids. Does the CA agree? Please explain.

HREA-CA-RT-1-IR-19. On page 51 (lines 15 to 18) did the "approved interconnection standards and agreements" developed via voluntary consensus process with input and participation from industry and other non-utility, non-CA parties, as was the IEEE-1547 standard? If not, please explain.

HREA-CA-RT-1-IR-20. On page 53 (lines 16 to 18) as part of the implementation process, does the CA support the development of a concise DG interconnection agreement (s), patterned in part after the utility's two-page, net metering agreement?

HREA-CA-RT-1-IR-21. On page 52, does the CA really believe there is no need to improve the utility's current interconnection agreements? For example, should not stand-by rates (where deemed appropriate, but which need further assessment) be included in the interconnection agreements? Please explain.

HREA-CA-RT-1-IR-22. Does the CA agree with Mr. Bill Bonnet's statement, on pages 11 and 12 of his rebuttal testimony (HECO-RT-6), that HECO's and the CA's are positions "aligned, or at least not in conflict, with respect to the issues in this proceeding?"

B. Hawaiian Electric Company, Maui Electric Company and Hawaii Electric Light Company ("HECO")

The following are information requests to Scott Seu, P. E., regarding his rebuttal testimony (HECO-RT-1) on behalf of HECO.

HREA-HECO-RT-1-IR-1. On page 9 (lines 1 to 3), you state the "independent implementation of DG/CHP results in loss of revenue to the utility." See also your comments on page 11 (lines 17 to 18). Is this really the case, when the utility is experiencing load growth, such as we are now in the islands? Specifically, as the load grows and new generation is needed, aren't we really talking about revenue opportunities, and not revenue losses?

HREA-HECO-RT-1-IR-2. On page 9 (lines 17 to 19), are you suggesting that because the "Companies have used DG sited at substations to address transmission and generation capacity requirements," that this makes it right for the Companies to do CHP? Please explain.

HREA-HECO-RT-1-IR-3. On page 10 (lines 10- to 12), please provide evidence of your assertion that "the general trend has been for CHP equipment vendors and energy service companies to move away from the model of owning equipment at a customer site."

HREA-HECO-RT-1-IR-4. On page 11 (lines 3 to 8), you claim that the Companies' economic analysis shows a positive net present benefit for all the Companies. HREA notes that the approximate net benefit over 20 years is $2.262M (about $113K/yr) for Oahu. However, we also note that the annual benefits are negative in 11 of the first 12 years of HECO's proposed program. With the $250K annual program cost element, which is not included in HECO's analysis, the annual average benefits would then be a NEGATIVE $137K. So how can you claim there is a net positive benefit to Oahu's ratepayers?

HREA-HECO-RT-1-IR-5. On page 14 (lines 3 to 11), your statements appear to be a restatement of your response to HREA-HECO-T-3-IR-1. Please provide specific examples to support your claim that third party CHP systems may be of substandard design or construction, and may be operated by third parties that lack adequate operating and maintenance training and experience. HREA also observes that you are implying that the Companies' CHP systems are superior. Please provide evidence that this is the case.

HREA-HECO-RT-1-IR-6. On page 15 (line 7) to page 16 (line 9) and also page 17 (lines 5 to 9), could not the system requirements/specifications that you propose for utility-owned CHP be made part of an non-utility CHP interconnection agreement that would make the non-utility CHP provider accountable to the utility for providing the same requirements/ specifications? Please explain your response.

HREA-HECO-RT-1-IR-7. As a follow-up to HREA-HECO-RT-1-IR-6, you indicate that HECO would use synchronous generators, which are quite a bit more expensive than induction generators. HREA notes that HECO's CHP tariff filing (Docket No. 03-0366) assumes that the utility will ONLY install induction generators (and if the customer wants synchronous generators, the customer is supposed to bear the cost differential). Given this change from induction to synchronous generators, are you planning to revise Exhibit H to the tariff filing to show synchronous generator costs?

HREA-HECO-RT-1-IR-8. As a follow-up to HREA-HECO-RT-1-IR-6, you indicate HECO will install four control modes, which are not currently provided on any of the third party installed systems in Hawaii. Are the added costs for these modes included in Exhibit H?

HREA-HECO-RT-1-IR-9. On page 18 (line 12), your reference to page 9 of HREA's direct testimony appears to be incorrect. Please identify the correct page number, or clarify your comment so that we can respond.

HREA-HECO-RT-1-IR-10. On page 18 (lines 18 to 22), you refer to the Companies' discussions with customers. HREA believes it would be valuable to this docket, if the Companies would identify the customers referenced above, and make them available for discussion. Are the Companies willing to do that? Please explain your response.

HREA-HECO-RT-1-IR-11. On page 22 (lines 10 to 16) and page 24 (lines 7) to page 25 (line 4), regarding HECO's perception of what makes for a competitive market, do you support use of conventional approaches, such as the Herfindahl-Hirschman market index, to characterize the nature of the anticipated CHP market? Specifically, in the Rebuttal Testimony of Jim Lazar on behalf of the County of Maui (Reference County of Maui Exhibit RT-2), Mr. Lazar has calculated the Herfindahl-Hirschman index for HECO's forecasted market share of CHP systems to be in excess of 5,300, where any number over 1,800 is considered to be "Highly Concentrated." Please explain position, given that Mr. Lazar's analysis contradicts your claim that "a competitive market will exist even if the utility owns and operates a majority of the CHP installations."

HREA-HECO-RT-1-IR-12. On page 22 (line 20) Page 23 (line 9), have there been any instances where HECO has offered balance of central plant equipment and services? If so, please explain the apparent change in HECO's philosophy on this issue.

HREA-HECO-RT-1-IR-13. On page 26 (lines 12 – 17), why would bidding every small CHP project not be efficient?

HREA-HECO-RT-1-IR-14. On page 28 (line 22) to page 29 (line 6), you have recognized that there have been complaints about the process to obtain an interconnection agreement and suggest that that the Rule 14.H will subject all Parties to the same requirements and process. Given that, what would be a reasonable amount of time be for a third party to receive an approved interconnection agreement from HECO, assuming the third party has submitted a "complete" application for an interconnection agreement? Also, please elaborate as necessary on what would constitute a "complete" application.

HREA-HECO-RT-1-IR-15. On page 32 (lines 16 - 21), would you agree that HECO is assuming less risk than third parties, knowing that HECO's costs will likely be approved for recovery by the PUC, whereas third parties don't have this type of "safety net?"

HREA-HECO-RT-1-IR-16. On page 32 (line 22) to page 33 (line 3), HREA suggests that this is an aspect of how Rule 14.H, which was not developed in a voluntary consensus manner, can negatively impact an industry entity. Please comment if you disagree.

HREA-HECO-RT-1-IR-17. On page 35 (lines 10 to 13), you state that the "Prior to the commencement of this docket; the Companies had not formulated a position as to whether a CHP System or a distributed generator owned by a third-party should be regulated by the Commission, except in the case of nonfossil-fuel generating facilities." HREA would like to note that MECO previously acquiesced to a non-utility diesel CHP plant for Maui Land & Pine that also served customers in the Kaahumanu shopping center, and the PUC approved it. Thus, it would appear that the Companies have formulated a position. Please comment if you disagree.

HREA-HECO-RT-1-IR-18. On page 39 (lines 9 to 18) and page 40 (lines 5 to 14), you have claimed that numerous customers see value in the Companies' proposed CHP program, and cite two example (Pacific Allied Products and the Sheraton Keauhou Resort). HREA believes it would be valuable to this docket, if the Companies would make these two customers available for discussion. Are the Companies willing to do that? Please explain your response.

HREA-HECO-RT-1-IR-19. On page 43 (lines 1 to 17), you have raised some important definition issues. Specifically, you suggest that "DSM Programs are designed to influence the use of energy." HREA would agree, and would clarify that definition by saying DSM Programs are designed to conserve energy and to use energy more efficiently, both of which serve to reduce energy demand. Would you agree?

HREA-HECO-RT-1-IR-20. As a follow-up to HREA-HECO-RT-1-IR-18, HREA observes that there are already DSM Programs that supply energy, i.e., the solar hot water programs for residential and commercial customers. HREA believes all DER measures, including measures to supply energy such as DG, *which are implemented on the customer's side of the meter*, all qualify as DSM measures, whether they are currently recognized and promoted as DSM programs. Another example would be net metering, which is not currently recognized as a DSM program. Would you agree?

HREA-HECO-RT-1-IR-21. On page 43 (line 20) to page 44 (line 9), are not there certain DSM measures, such as automated load management and efficiency systems, that are operated and maintained by third party Energy Service Companies (ESCOs)?

HREA-HECO-RT-1-IR-22. On page 44 (line 17) to page 46 (line 9), HREA thanks you for discussing the differences between solar hot water systems and CHP systems, especially in terms of level of energy output (certainly residential hot water systems are lower output than the CHPs envisioned by HECO, but higher temperature solar systems may soon come to the market, and some of these will be CHPs) and numbers (there are currently many more residential hot water systems that perhaps anyone envisions for CHP, unless you consider the possibility of residential CHPs, which may soon come to the market). Thus, HREA observes that the differences are primarily in scale rather than type. Both solar and CHP systems are options that a customer can elect to choose reduce his electrical demand from the utility. So, why would it be impractical for the Companies to own thousands of solar systems? For example, the Companies most likely own thousands of utility poles and transformers.

The following are information requests to Arthur Seki, regarding his rebuttal testimony (HECO-RT-2) on behalf of HECO.

HREA-HECO-RT-2-IR-1. On page 2 (line 24), since Renewable Hawaii, Inc. is a HECO company, please clarify how it is a non-regulated subsidiary.

The following are information requests to Ross H. Sakuda, P.E., regarding his rebuttal testimony (HECO-RT-3) on behalf of HECO.

HREA-HECO-RT-3-IR-1. On page 2 (line 4), please explain the generating system reliability goal of 4.5 years per day, and contrast this goal with other potential reliability goals, such as Mean Time Between Failure (MTBF) and percentage of time without failures (i.e., 99%, 99.9%, 99.99%, etc.).

HREA-HECO-RT-3-IR-2. On page 2 (line 25) to page 3 (line 3), please provide more details regarding the number and capacity of generators that were off-line, and comment on how the generator downtimes compare with and/or impacts the reliability goal stated above.

HREA-HECO-RT-3-IR-3. On page 5 (lines 22 to 24), wouldn't it be more correct if the sentence read; "the additional firm capacity will help address the reserve margin situation, but will not offset the need for capacity offered by *potential* CHP systems?"

HREA-HECO-RT-3-IR-4. On page 11 (lines 13 to 23), would it be possible to modify the existing base integration analysis to estimate the impacts of the utility CHP program on non-participants? If so, do you have an estimate of how much the modifications would cost?

The following are information requests to Shari Y. Ishikawa, P.E., regarding her rebuttal testimony (HECO-RT-4) on behalf of HECO.

HREA-HECO-RT-4-IR-1. On page 2 (lines 5 to 10) and several other places in your testimony (pages 5, 6, 7, 9, and 10), you discuss the difficulty of doing long-term analysis of transmission and distribution analysis to support planning for CHP in IRP. Why not just focus on short-term analysis to support the 5-year action plans for each IRP?

HREA-HECO-RT-4-IR-2. On page 12 (lines 18 to 23), you discuss the practical issues with DG. Would you agree that central generation (CG) has the same practical issues, and,

in general, resolving these issues is easier for DG than for CG? Please explain your answer.

HREA-HECO-RT-4-IR-3. Are there any other analytical models available today or under development which could enhance HECO's current ability to model transmission and distribution issues to support planning for CHP in IRP?

The following are information requests to Estrella Seese, P.E., regarding her rebuttal testimony (HECO-RT-5) on behalf of HECO.

HREA-HECO-RT-5-IR-1. On page 4 (lines 14 to 24), HREA believes that the price signals should be improved by removing the class cross-subsidies. Do you agree? Please explain your answer.

HREA-HECO-RT-5-IR-2. On page 9 (lines 7 to 17), when designing stand-by service rates, would it not be appropriate to take into account the services that the DG facility is providing to the utility, e.g., capacity at no charge to the utility? Please explain your answer.

HREA-HECO-RT-5-IR-3. On page 10 (lines 8 to 13), you discuss the stipulated standby rate level on HELCO's standby service rider (Rider A). What was the basis for the apportionment among generation (at 20%), transmission (at 52%) and distribution demand (100%) costs?

HREA-HECO-RT-5-IR-4. Regarding the discussion on the COM's proposal on inverted rates for the residential class on pages 13 and 14, conceivably removing the class cross-subsidies could totally change this discussion. Do you agree?

HREA-HECO-RT-5-IR-5. On page 14 (lines 7 to 14), please provide a brief discussion of the demographics of the 160 residential customers participating in the pilot time-of-use rate program.

HREA-HECO-RT-5-IR-6. Also on page 14 (lines 17 to 22), please provide a brief discussion as to whether the current declining block rates for Schedules J and P reflect the actual costs to serve those customers. Specifically, how do the costs go down with increased energy use?

The following are information requests to Douglas A. Gegax, Consultant, regarding his rebuttal testimony (HECO-RT-5A) on behalf of HECO.

HREA-HECO-RT-5A-IR-1. On page 2 (lines 10 to 12), HREA observes that we already have a "partial" rate unbundling in Hawaii. On our monthly residential bills, we see separate charges as follows: customer charge, non-fuel energy, base fuel energy, energy cost adjustment, IRP cost recovery, and sometimes a temporary rate adjustment. If the bills were adjusted to incorporate the breakout that you have suggested on page 6 (i.e., generation, transmission, distribution, ancillary services and retail supply), HREA believes this would provide a valuable educational service to customers. Do you agree? Please explain your answer.

HREA-HECO-RT-5A-IR-2. On page 8 (lines 17 to 26), page 11 (lines 2 to 13) and page 13 (line 12) to page 15 (line 6), when designing stand-by service rates, would it not be appropriate to take into account the services that the CHP facility is providing to the utility, e.g., capacity at no charge to the utility? HREA notes that the CHP facility provides capacity by virtue of off-setting the need for utility generators to supply a portion up to the customer's entire load. Furthermore, given that there will be some periods when the CHP facility will be down for maintenance, it is primarily the down periods which coincide with the utility's peak periods that are important. In any case, given that an individual CHP's size will be a small fraction of the utility's capacity and it is not likely that a large number of CHPs will be down at the same time, HREA believes the utility ~~will be~~ able to cover the CHP's normal load with its operational reserve and/or spinning reserve (which is available on Oahu). Please explain your answer.

HREA-HECO-RT-5A-IR-3. On page 9 (line 9) to page 10 (line 6), why have you not mentioned the need for a customer of a utility-owned CHP to pay for stand-by service? Does not the utility have to provide back-up service to this DG customer upon request, just like any other customer?

whose site the generation is located, so that that customer should get a discount for it, or is that a benefit that belongs to the utility system customers as a whole and should be rolled in to all customer rates and ERAC computations?

HREA-HECO-RT-5A-IR-4. On page 9 (line 9) to page 10 (line 6), why have you not mentioned the need for a customer of a utility-owned CHP to pay for stand-by service? Does not the utility have to provide back-up service to this DG customer upon request, just like any other customer?

HREA-HECO-RT-5A-IR-5. On pages 13 and 14, how does your proposal for stand-by rates distinguish between those units that go down a lot and make more calls on the system from those which perform reliably? HREA observes that is why the County of Maui's consultant, Jim Lazar, puts more of the costs in the energy charge.

HREA-HECO-RT-5A-IR-6. On page 16 (lines 17 to 21), you state that "Lazar failed to include ancillary service charges in his description of wheeling fees." First, do you agree with CA (page 37 of Herz's rebuttal testimony), that it might be too hard to calculate ancillary service charges? Second, would you agree that a major benefit of unbundling the rates would be to calculate ancillary service charges, whether it be for wheeling fees or for standby rates?

HREA-HECO-RT-5A-IR-7. On page 17 (lines 15 to 17), are you aware of any public utility, including municipally-owned and cooperatives, that have implemented any sort of an impact fee on new demand? If so, please provide a brief discussion.

HREA-HECO-RT-5A-IR-8. HREA believes that the price signals should be improved by removing the class cross-subsidies. Do you agree? Please explain your answer.

HREA-HECO-RT-5A-IR-9. In the case where the utility owns and operates a CHP, the ratepayers will pay for the effective capacity, e.g., 1 MW. Given that the utility must provide back-up for that 1 MW load, won't the ratepayers be paying for the capacity twice? Please explain your answer.

****

END OF INFORMATION REQUESTS

****

DATED: November 1, 2004, Honolulu, Hawaii

President, HREA

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Information Requests on the Rebuttal Testimonies of Various Parties 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:

Party		Party	
DIVISION OF CONSUMER ADVOCACY 335 Merchant Street Room 326 Honolulu, HI 96813	3 copies	BRIAN T. MOTO, CORPORATION COUNSEL County of Maui Dept. of the Corporation Counsel 200 S. High Street Wailuku, HI 96793	1 copy
THOMAS W. WILLIAMS, JR. ESQ. PETER Y. KIKUTA, ESQ. Goodsill, Anderson, Quinn & Stifel Alii Place, Suite 1800 1099 Alakea Street Honolulu, Hawaii 96813	1 copy	CINDY Y. YOUNG, DEPUTY CORPORATION COUNSEL County of Maui Dept. of the Corporation Counsel 200 S. High Street Wailuku, HI 96793	1 copy
WILLIAM A. BONNET, Vice President Hawaiian Electric Company, Inc. Hawaii Electric Light Company, Inc. Maui Electric Company, Limited P. O. Box 2750 Honolulu, Hawaii 96840-0001	1 copy	JOHN CROUCH Box 38-4276 Waikoloa, HI 96738	1 copy
PATSY H. NANBU Hawaiian Electric Company, Inc. P. O. Box 2750 Honolulu, Hawaii 96840-0001	1 copy	RICK REED Inter Island Solar Supply 761 Ahua Street Honolulu, HI 96819	1 copy
ALAN M. OSHIMA, ESQ. KENT D. MORIHARA, ESQ. 841 Bishop Street, Suite 400 Honolulu, Hawaii 96813	2 copies	CHRISTOPHER S. COLMAN Deputy General Counsel Amerada Hess Corporation One Hess Plaza Woodbridge, N.J. 07095	1 copy
ALTON MIYAMOTO President & CEO Kauai Island Utility Cooperative 4463 Pahe'e Street Lihue, Hawaii 96766	1 copy	SANDRA–ANN Y. H. WONG, ESQ. 1050 Bishop Street, #514 Honolulu, Hawaii 96813	1 copy
KALVIN K. KOBAYASHI, ENERGY COORDINATOR County of Maui Department of Management 200 S. High Street Wailuku, HI 96793	1 copy	MICHAEL DE'MARSI Hess Microgen 4101 Halburton Road Raleigh, NC 27614	1 copy

Party

HENRY CURTIS Life of the Land 76 North King Street, Suite 203 Honolulu, HI 96817	3 copies
LANI D. H. NAKAZAWA, ESQ. Office of the County Attorney County of Kauai 4444 Rice Street, Suite 220 Lihue, HI 96766	2 copies
GLENN SATO, ENERGY COORDINATOR c/o Office of the County Attorney County of Kauai 4444 Rice Street, Suite 220 Lihue, HI 96766	1 copy

Dated: November 1, 2004

President, HREA