03-14-05

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF HAWAII

---- In the Matter of ----	)	
	)	
PUBLIC UTILITIES COMMISSION	)	DOCKET NO. 03-0372
	)	
Instituting a Proceeding to Investigate Competitive Bidding for New Generating Capacity in Hawaii.	)	

FILED
2005 MAR 14 P 2: 35
PUBLIC UTILITIES COMMISSION

PRELIMINARY STATEMENT OF POSITION

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. 03-0372
	)	
Instituting a Proceeding to Investigate Competitive Bidding for New Generating Capacity in Hawaii.	)	

I. INTRODUCTION AND SUMMARY

The Hawaii Renewable Energy Alliance hereby submits this document, including our Preliminary Statement of Position, dated March 14, 2005, to the Public Utilities Commission (PUC), in accordance with the PUC's Prehearing Order Number 20923 (Reference Docket No. 03-0372).

HREA supports competitive bidding for all new generation in Hawaii and believes there will be overall benefits to Hawaii's utilities and their ratepayers and Hawaii's economy. These include the potential to stabilize utility rates in the near term and reduce rates in the long term.

The implementation and impact of competitive bidding will be paced, in part, on: (1) how rapidly Hawaii's electricity market is opened to increased competition, (2) getting the implementation of competitive bidding right, (3) encouraging innovation in the market place, and (4) the ease of market entry to independent power producers.

HREA's preliminary statement of position, including our response to the issues as presented in this docket's Prehearing Order, is included in section II.

II. HREA's PRELIMINARY STATEMENT OF POSITION

Before a discussion of the specific issues raised in the PUC's Prehearing Order No. 20923, dated April 23, 2004, HREA would like to suggest a common jargon for the purpose of this Docket.

A. A Common Jargon

HREA suggests the following terms be defined for the purposes of this docket: back-up power, central generation, combined heat and power, distributed generation, energy service provider, energy storage, hybrid renewable energy systems, independent power producer and renewable energy..

Back-up power is as-needed power provided by supply-side devices, such as reciprocating engines. Traditionally, these devices are used to charge batteries or to meet electrical load requirements when the primary devices are not operating.

Central Generation (CG) is typically large conventional, fossil-fueled facilities (one or more units of one or more types of prime movers/electrical generators) which are designed to provide electricity to all customers on the grid via a transmission and distribution network. Note: in Hawaii CG is located in one or two key locations on each of the island grids, e.g., Kahe, Waiau and Barbers Point on Oahu, Hilo and Kona on Hawaii, Kahului and Maalaea on Maui, and Lihue and Port Allen on Kauai. CG is interconnected to the grid at transmission voltage (for example, 138 kV and 46 kV on Oahu; 138 kV, 69 kV, and 34.5 kV on Hawaii; 69 kV and 23 kV on Maui).

Combined Heat and Power (CHP) (also referred to as cooling, heating and power or cogeneration) is the sequential production of electricity and useful thermal energy such as steam, hot and chilled water, refrigeration and humidity control.

Decentralized generation (DCG) is facilities (fossil and renewable) that are generally larger than 10 MW and are interconnected to the grid at transmission or sub-transmission voltages. DCG are typically sited to be closer to new load centers than CG. Examples of DCG are the Honolulu Power Plant on Oahu; Hamakua Energy Partners and the proposed 20 MW South Point windfarm on Hawaii; and the proposed 30 MW Kaheawa Pastures windfarm on Maui.

Distributed generation (DG) includes supply- and/or demand-side devices that provide electricity, thermal and/or mechanical energy. These resources, generally 10 MW or less, can be located on-site or nearby to users. They can be used to meet baseload power, peaking power, backup power, remote power, power quality, and cooling, heating and power needs. DG includes energy supply devices ("prime movers") for providing electricity, thermal, and /or mechanical energy to users from on-site or nearby locations, and energy storage and interconnection equipment needed to interconnect with customers and/or the utility grid. Examples of DG are wind turbines, biomass cogeneration, hydroelectric plants, photovoltaics, fuel cells, microturbines, reciprocating engines, CHP, and pumped hydro storage.

HREA believes the differences between supply-side and demand-side DG needs further clarification as follows:

- Demand-Side DG. DG that are installed on the customer-side of the meter, are designed to serve a limited number of identifiable customers, and are typically interconnected at customer voltage levels (i.e., 110 v to 480 v), and
- Supply-Side DG. DG that are installed on the utility-side of the meter, designed to serve all customers in one portion of the grid, and are typically interconnected at sub-transmission or distribution voltage levels (e.g., 4 to 34.5 kV).

  Note: HREA believes the distinction between supply-side DG and DCG may blur over time as DG become more prevalent.

Energy Service Provider is an entity that provides electric service to a retail or end-use customer.

Energy storage is defined as electrochemical and kinetic energy technologies which allow energy to be accumulated, stored and then released at a later time. These technologies include batteries, flywheels, compressed air, hot and cold water, pumped hydro and liquid, compressed or solid-state forms of hydrogen.

Hybrid Renewable Energy Systems are electrical-energy systems comprised of two or more renewable energy components with or without energy storage and/or back-up power. Some examples are wind/diesel, PV/battery, wind/PV/battery, and wind/PV/battery/biodiesel. Note: in this case, biodiesel means a diesel-electric generator which uses biodiesel fuel or a blend of biodiesel with conventional diesel fuel.

Independent Power Producer is a type of competitive power supplier. The term is synonymous with merchant generator, cogenerator, non-utility generator, private power producer, Qualifying Facility (QF)[1], and exempt wholesale generator.[2]

Renewable energy are those sources of energy that are naturally and constantly replenished, e. g., wind, solar, biomass, geothermal, hydro, ocean thermal and wave. One of the major benefits to Hawaii is that we have all of these renewable sources already in use or potentially available for development.

[1] A Qualifying Facility is an individual (or corporation) who owns and/or operates a generation facility, but is not primarily engaged in the generation or sale of electric power. QFs are either renewable power production or cogeneration facilities that qualify under Section 201 of PURPA. Reference: Independent Energy Producers Association web-site. See: http://www.iepa.com/FAQs.asp.

[2] Reference: Independent Energy Producers Association web-site. See: http://www.iepa.com/FAQs.asp.

B. HREA's Position on the Issues

The following is HREA's position on the issues as stated on page 2 in the Prehearing Order:

1. What are the benefits and impacts of competitive bidding?

HREA Position:

Overall Benefits. HREA believes competitive bidding will provide the following overall benefits to Hawaii's ratepayers and its economy:

- increased innovation and lower prices in the supply of electrical products and services,
- improved system efficiency, reliability and safety, and increased customer choice, and
- mitigation of rate increases in the short term, lower rates in the long term.

HREA notes that similar benefits were identified in Docket No. 96-0493 (Instituting a Proceeding on Electric Competition, Including an Investigation of the Electric Utility Infrastructure in the State of Hawaii):

- The Consumer Advocate stated: "the primary objective of introducing competition to the electric industry must be to reduce the price of electric services over time for all consumers, while retaining or enhancing safety, reliability, environmental protections and consumer protections[3]."
- In its draft position statement[4], the Department of Business, Economic Development and Tourism (DBEDT) stated: "the principal benefits expected of competition are lower prices that will result from greater efficiency and enhanced competitiveness for Hawaii's economy. In addition, greater use of advanced technologies could be anticipated."
- DBEDT also quoted from the Clinton Administration's *Comprehensive Electric Competition Plan:*[5] "We believe that a more competitive electricity industry will provide immense benefits to individual American consumers as well as being an overall boon to our economy. It will result in lower prices, a cleaner environment, greater innovation and new services, a more reliable power supply grid, and save the government money."

[3] Exploring Opportunities for Competition in Hawaii's Electric Industry, Division of Consumer Advocacy, State of Hawaii, June 5, 1998, pg. ES-1.

Specific Benefits. HREA anticipates the following specific benefits:

- Lower Prices. Lower prices to all consumers over time, as renewables, with lower costs than fossils, are implemented, and potentially with implementation of new, more-efficient fossil power plants. Note: however, HREA anticipates that efficiency gains in new fossil CG, DCG and supply-side DG will likely be off-set by increased fuel costs;
- Increased innovation. Innovation can be natural result of competitive bidding, as bidders seek to gain advantages by offering lower prices and/or expanded facility features and capabilities. On the other hand, an improperly designed competitive bidding process can stifle innovation and competition;
- Increased customer choice. HREA believes opening of the wholesale market to greater competition will lead to evaluation of a greater number of potential projects in IRP. How could this happen? For example, customers provide input to the utilities in the IRP process and the resulting IRP addresses the customer input. Note: It remains to be seen if the light of customer choice will really shine on IRP. So far, it really hasn't. Hence, we believe we cannot proceed very far on this docket without discussing how to improve IRP;
- Increased renewable energy and storage facilities. Given the impetus of our Renewable Portfolio Standard (RPS) law, the use of renewables should increase over time. HREA believes that use of complementary storage technologies, such as pumped storage, will provide a number of system benefits and should be supported;

---

[4] Draft Position Paper of the State of Hawaii Department of Business, Economic Development and Tourism Regarding Electricity Competition in Hawaii, Docket No. 96-0493, June 4, 1998, pg. 2.

[5] Comprehensive Electricity Competition Plan, U. S. Department of Energy, <http://www.doe.gov/>, April 13, 1998.

- Improved system efficiency. System efficiency will improve over time as DG, DCG and CG are installed with higher operating efficiencies that existing power plants. The improvements in system efficiency will translate to lower lifecycle costs and potentially lower utility rates. This trend will be enhanced, if there is a shift away from CG and DCG to DG. However, as noted above, HREA anticipates that efficiency gains in new fossil CG, DCG and supply-side DG will likely be off-set by increased fuel costs;
- Reduction of greenhouse gas emissions. Clearly, reduction of greenhouse gas emissions is a collateral benefit of installing more renewables. Whereas, installation of more efficient fossil CG, DCG and DG doesn't guarantee the same benefit. However, if an existing fossil CG was replaced by more efficient CG or DG, then there would be a net reduction in emissions.
- Enhanced energy security. Energy security now looms as the new wild card in energy policy. Clearly, diversification of resources through competitive bidding would provide greater energy security. However, HREA believes, lest we be overly sanguine about increasing the number of power plants to boost our energy security, we need only remember that a terrorist attack on a key T&D component could bring a grid down. Consequently, HREA believes more emphasis on DG is warranted.

Impacts. HREA anticipates the following specific impacts with implementation of competitive bidding in Hawaii:

- Need to improve IRP to facilitate competitive bidding. HREA believes we have to improve IRP. See detailed discussion below on issue 2.d;
- Costs and benefits of structuring competitive bidding of wholesale power sources. This is one of the major challenges/opportunities on this docket. See detailed discussion below on issues 2.a to 2.c;
- Assuring system reliability and safety. HREA believes system reliability and safety can be assured and improved over time by:
  - including reliability and safety requirements in the specifications for requests for proposals (RFPs) in competitive bidding, and
  - requiring reporting of reliability and safety attributes on existing and future facilities.
- Protecting consumer interests. HREA believes consumer interests can be protected and addressed over time by:
  - PUC actions to ensure that competitive bidding is designed and implemented in a fair, equitable and even-handed manner, and
  - requiring competitive bidding on all new wholesale power facilities and retrofits to existing facilities.
- Balancing investor owned utility (IOU) interests with the interests of the ratepayers. HREA believes the:
  - IOU should have the opportunity to compete directly or via a utility-affiliate for the provision of wholesale power to the grid (See issue 2.b), and
  - ratepayers' interests would be protected by the likely result of competitive bidding approach to achieve lowest costs.

2. Whether a competitive bidding system should be developed for acquiring or building new generation in Hawaii"

HREA Position:

HREA's position is "yes", a competitive bidding system should be developed for acquiring or building new generation in Hawaii

If the answer is "yes", then:

a. How can a fair competitive bidding system be developed that ensures that competitive benefits result from the system and ratepayers are not placed at undue risk?

HREA Position:

HREA considers this to be both an interesting and thought-provoking question. First, we are not sure how to define "undue risk." Undue can have several connotations, e.g., excessive, unnecessary and unjustified. We observe that utility rates have gone up when the utility installs a new power plant, and rate increases are not viewed as placing undue risk on the ratepayer. We also observe that the proposed rate increase for the East Oahu Transmission Project is on the order of 10%. So is a rate increase of 10% considered to be putting the ratepayer at undue risk? Depending on one's perspective, one could say yes or no, depending upon whether one thought the rate hike was excessive, unnecessary and/or unjustified.

Let's consider another potential for "undue risk." Currently, ratepayers absorb all costs for electrical service provided by the utility pursuant to their customer class and the utility charges allowed by the PUC. Hence, HREA believe it is appropriate to say that the ratepayer assumes most, if not all, of the risks associated with his electricity service. The question is whether some of his risks, such as the risks associated with fuel costs, are undue? We believe they are. HREA believes further that the ratepayer should not absorb all the risks. We believe the:

- utility should be required share some of the risks, e.g., some of the risks associated with continued use of fossil fuels, and
- risks can be reduced through implementation of a fair competitive bidding system.

HREA would like to recommend the following principles for a fair competitive bidding system in Hawaii, based on the possible application of one or both of two models:

- Model 1 (Competition Based on Utility Proposal). This model assumes that a site has been identified by the utility for a new facility. The utility has identified the desired capacity of the facility and possibly the type (fossil, renewable, storage), firm vs. intermittent and other details. The competition would proceed with the following steps:
  - Utility study for new facility. The utility identifies the need and prepares specifications/costs for a new power plant based on results of IRP (site, size, type, installed cost, O&M costs, lifecycle costs, timeline, etc.);
  - Facility Bidding Baseline. The utility prepares a facility bidding baseline, including the desired facility type (fossil, renewable, storage), capacity (in MWs or kWs), diurnal capacity delivery schedule, minimum annual energy (in MWHs or kWhs), installed costs, operating costs over X years, the delivered wholesale cost of electricity, the desired operational date, details on permitting actions, and a standard offer contract (SOC) for purchase of power from independent power producers (IPPs), and all other relevant information or actions required by a successful bidder;
  - Solicitation. The utility provides the bidding baseline to independent contracting agent (ICA), selected and monitored by the PUC, who solicits and reviews bids from independent power producers (IPPs) to meet or beat the utility's baseline system requirements, costs and timeline; and

- PUC Approval/Project Award. The PUC reviews and approves the ICA recommendation for the project award. If the winner is an IPP, the PUC monitors the negotiation of and approves the power purchase agreement (PPA). If the winner is the utility, the PUC monitors the utility, including technical performance, timeline and costs and timeline.

- Model 2 (Open Competition with IPPs Only). This model does NOT assume that a site has been identified by the utility for a new facility. The utility HAS identified the desired capacity of the facility and possibly the type (fossil, renewable, storage), firm vs. intermittent, site (if identified) and other details. The competition would proceed with the following steps
  - Facility Bidding Requirements. The utility prepares the requirements for the facility based on results of IRP, including the desired facility type (fossil, renewable, storage), capacity (in MWs or kWs), diurnal capacity delivery schedule, minimum annual energy (in MWHs or kWhs), site (if identified), a target delivered wholesale cost of electricity (cents/kWh), the desired operational date and term of operation, the SOC, and all other desired information from the bidder;
  - Solicitation. The utility provides the bidding requirements to the ICA, selected and monitored by the PUC, who solicits and reviews bids from IPPs. Note: a utility-affiliate could bid as an IPP, but the utility cannot bid in this case; and
  - PUC Approval/Project Award. The PUC reviews and approves the ICA recommendation for the project award. The PUC monitors the negotiation of and approves the PPA.

b. What are the specific competitive bidding guidelines and requirements for the prospective bidders, including the evaluation system to be used and the process for evaluation and selection?

HREA Position:

In addition to the discussion in response to issue 2.a (above), HREA would like to make the following comments and recommendations:

- Either of the models described in response to issue 2.a could be used for a competitive bidding process for fossils, renewables and storage;
- HREA recommends that separate competitive bidding processes be implemented for fossils, renewables and storage, i.e., a fossil-only vs. a renewable-only vs. a storage-only. There could be some exceptions, e.g., if the utility was interested in a relatively small firm facility, it may make sense to solicit fossil, renewable and storage bids;
- The bidding process should be flexible to allow a two-step approach as follows:
  - <u>Step 1: Resource Assessment, Site Access and Permitting</u>. The bidder might propose as specific time period (one to three years) to complete resource assessment activities, an agreement to gain access to the project site, and time to secure a permit); and
  - <u>Step 2: Negotiation of the PPA and approval by the PUC</u>. After completion of the first step, which is generally required for an IPP to secure financing, the bidder would negotiate the PPA with the utility, sign and forward to the PUC for approval; and

- HREA recommends that the evaluation criteria to be used by the ICA in reviewing and selecting the winning bid (s) be developed by the utility, reviewed by the PUC and presented to potential bidders in a pre-bidders conference, scheduled in advance of the release of the request for proposals (RFP). At a minimum, the evaluation criteria should include following:
  - background experience and expertise of the bidder,
  - proposed technical approach to the meeting the requirements of the RFP,
  - proposed management approach for the proposed project,
  - proposed cost for the delivery of electricity to the utility, and
  - contributions to the state's RPS law.

Note 1: Each of the criteria would be given a "weighting factor" so that an overall quantitative score can be determined.

Note: HREA reserves the right to provide additional comments and recommendations on this issue at a later time, including a review of lessons learned from other jurisdictions.

c. How can a fair competitive bidding system encourage broad participation from a range of prospective bidders?

HREA Position:

In addition to the discussion in response to issues 2.a and 2.b (above), HREA would like to make the following comments and recommendations:

- Independent Solicitation Process. HREA believes this is absolutely the single-most important step to ensure that the competitive bidding system is fair and will encourage broad participation from a range of prospective bidders. In addition to the discussion in 2.a and 2.b above, if there is even the slightest appearance that the utility can influence the recommendations of the ICA and the decision of the PUC, prospective bidders will be reluctant to participate. Consequently, the ratepayers cannot be assured that new generation will be acquired at the lowest costs;
- Standard Offer Contract. A standard offer contract (SOC) is absolutely needed as an element of the RFP. While a bidder may be able to meet the overall technical requirements of the RFP, the bidder will not be able to prepare an adequate offer for the delivered price of electricity, if he does not know the terms and conditions of the SOC;
- Uniform availability of data and information. The ICA and PUC must be able to ensure that all prospective bidders are provided with all relevant data and information available to the utility regarding the project. This is particularly true if the bidders are in competition with utility (Model 1) or a utility-affiliate (Model 2); and
- PUC as the watchdog. HREA believes that the PUC will need to act as the watchdog to monitor and enforce the competitive bidding process to ensure that it is fair and that broad participation is encouraged.

d. What revisions should be made to the integrated resource planning process?

HREA Position:

HREA believes each element of the existing IRP process can be improved to enhance the process of competitive bidding. Competitive bidding, in turn, can then be used to feedback and enhance and improve the IRP process. We will use the following discussion of the generic elements in an improved IRP process to discuss and illustrate our recommendations:

- Forecasting. Forecasting now includes traditional estimates of new load growth taking into consideration the impacts of certain demand-side management (DSM) measures. Forecasting should now include all the DSM measures as discussed below.
- Demand-side management. Demand-side management includes evaluation of measures to reduce demand, which may or may not be implemented via utility DSM program elements. The following are current and proposed new measures (which are *italicized)*:
  - Traditional energy-efficiency and load management,
  - Energy conservation, including solar hot water, *sea water cooling and solar air conditioning;*
  - *Net metered renewable systems, and*
  - *Other DG, including CHP.*

  The selected DSMs are provided as input to Forecasting and Integration.

- Supply-Side Management. HREA proposes a number of clarifications and revisions to the screening and evaluation of supply-side management (SSM) measures including:
  - Fossil Screening and Evaluation. Traditional screening and evaluation of fossil sources should focus on identifying technologies to:
    (i) provide as input for a fossil-only, competitive bidding process (as discussed above in response to issues 2.a to 2.c), and
    (ii) continue to track, evaluate, and recommend to Integration fossil technologies for both the 5-year action plan and 20-year long-term plan;
  - Renewable Screening and Evaluation. Screening and evaluation of renewables sources should focus on identifying technologies to:
    (i) provide as input for a renewable-only, competitive bidding process (as discussed above in response to issues 2.a to 2.c), and
    (ii) continue to track, evaluate, and recommend to Integration renewable technologies for both the 5-year action plan and 20-year long-term plan;
  - 5-Year Action Plan. The most promising fossil and renewable/storage sources for short-term, 5 year action plan should be updated, based on the results of the competitive bidding processes (as discussed above in response to issues 2.a to 2.c); and
  - 20-Year Action Plan. The most promising fossil and renewable/storage sources for the 20-year long-term plan should be updated based results of the competitive bidding processes (as discussed above in response to issues 2.a to 2.c).

- Integration. Overall, whereas in the past, a number of alternative IRPs were generated from the committee inputs, HREA believes it will be more productive to go directly for the "golden fleece" – the plan to meet our RPS law, mitigate energy and fuel supply risks and move us down the path to sustainable energy. In this regard, HREA proposes a number of clarifications and revisions to the Integration process as follows:
  - Maximizing the amount of DSMs – based on a thorough evaluation of the costs/benefits of each measure with a focus on the 5-year action plan. This activity should include providing inputs to the PUC regarding desired taxpayer/ratepayer incentives, including justification for continuation of existing incentives and proposals for new incentives;
  - Maximizing the value of competitive bidding – based on evaluating inputs from SSM and updates to select projects for the 5-year action plan. This activity would provide a more accurate assessment of costs for specific projects and would hopefully provide Integration with the data and information need to make the decisions for the SSMs to meet demand, RPS and other IRP goals; and
  - Providing Inputs to the Advisory Group – based on reviewing implementation options, Integration would provide the details of the recommended IRP to the Advisory Group.

- Advisory Group. The Advisory Group is an independent group of non-utility stakeholder organizations and individuals. HREA recommends:
  - Make up of the Advisory Group. The Advisory Group should have a balanced number of members from the key stakeholder groups, such as government, industry, community organizations, environmental organizations, and the community at-large;
  - Review and comment on the IRP process and results. The Advisory Group has traditionally reviewed and commented on the IRP process, proposed plans and recommended IRP. In addition, HREA recommends that the Advisory Group's recommendations be given more weight in the overall process, and specifically that the utilities resolve to work in a more collaborative manner with the Advisory Group;
  - Ensuring inputs from the utility's customers – HREA recommends that the Advisory Group assist the utility in soliciting input and comments from the community at-large. In this regard, HREA suggests that MECO's current efforts to reach out to the community should be tracked and evaluated as a potential model for other IRP processes; and
  - Advisory Overall Goal. HREA believes that the overall goal of the Advisory Group should be to achieve a collaborative effort with the utility, such that the resulting IRP does not need to be contested.

C. Conclusion

Our Preliminary Statement of Position is presented with the august goal of working with the PUC and the other Parties in this docket to develop and implement a robust, innovative and competitive market for new generation in Hawaii. We believe achieving this goal will help us take a major step down the path to the sustainable energy future that awaits us.

DATED: March 14, 2005, Honolulu, Hawaii

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:

Party		Party	
DIVISION OF CONSUMER ADVOCACY 335 Merchant Street Room 326 Honolulu, HI 96813	3 copies	SANDRA–ANN Y. H. WONG, ESQ. 1050 Bishop Street, #514 Honolulu, Hawaii 96813	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	CHRISTOPHER S. COLMAN Deputy General Counsel Amerada Hess Corporation One Hess Plaza Woodbridge, N.J. 07095	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	MICHAEL DE'MARSI Hess Microgen 4101 Halburton Road Raleigh, NC 27614	1 copy
PATSY H. NANBU Hawaiian Electric Company, Inc. P. O. Box 2750 Honolulu, Hawaii 96840-0001	1 copy	BRIAN T. MOTO, CORPORATION COUNSEL County of Maui Dept. of the Corporation Counsel 200 S. High Street Wailuku, HI 96793	1 copy
KENT D. MORIHARA, ESQ. MICHAEL H. LAU, ESQ. 841 Bishop Street, Suite 400 Honolulu, Hawaii 96813	2 copies	CINDY Y. YOUNG, DEPUTY CORPORATION COUNSEL County of Maui Dept. of the Corporation Counsel 200 S. High Street Wailuku, HI 96793	1 copy
H.A. DUTCH ACHENBACH JOSEPH McCAWLEY MICHAEL YAMANE Kauai Island Utility Cooperative 4463 Pahe'e Street Lihue, Hawaii 96766	1 copy	KALVIN K. KOBAYASHI, ENERGY COORDINATOR County of Maui Department of Management 200 S. High Street Wailuku, HI 96793	1 copy

Party		Party	
LANI D. H. NAKAZAWA, ESQ. Office of the County Attorney County of Kauai 4444 Rice Street, Suite 220 Lihue, HI 96766	2 copies	THOMAS C. GORAK Gorak & Bay, LLC 76-6326 Kaheiau Street Kailua-Kona, HI 96740-3218	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	GORDON BULL Branch Manager Johnson Controls, Inc. 3526 Breakwater Court Hayward, CA 94545	1 copy
GEORGE T. AOKI, ESQ The Gas Company P.O. Box 3000 Honolulu, HI 96802-3000	1 copy	RICK REED Inter Island Solar Supply 761 Ahua Street Honolulu, HI 96819	1 copy
STEVEN P. GOLDEN The Gas Company P.O. Box 3000 Honolulu, HI 96802-3000	1 copy	JOHN CROUCH Box 38-4276 Waikoloa, HI 96738	1 copy
GAIL S. GILMAN The Gas Company P.O. Box 3000 Honolulu, HI 96802-3000	1 copy		

Dated: March 14, 2005

President, HREA