

ORIGINAL

DIVISION OF CONSUMER ADVOCACY
Department of Commerce and
Consumer Affairs
335 Merchant Street, Room 326
Honolulu, Hawaii 96813
Telephone: (808) 586-2800

PUBLIC UTILITIES
COMMISSION

2004 NOV -8 P 3:45

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
)
HAWAIIAN ELECTRIC COMPANY, INC.)
)
For Approval of to Commit Funds in Excess)
of \$500,000 for Item Y48500, East Oahu)
transmission Project.)

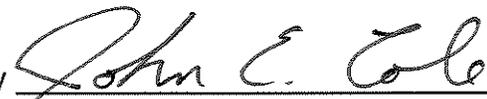
DOCKET NO. 03-0417

DIVISION OF CONSUMER ADVOCACY'S
SUPPLEMENTAL INFORMATION REQUESTS

Pursuant to the Schedule of Proceedings approved in Order No. 20968, the
Division of Consumer Advocacy hereby files its **SUPPLEMENTAL INFORMATION**
REQUESTS in the above docketed matter.

DATED: Honolulu, Hawaii, November 8, 2004.

Respectfully submitted,

By 

JOHN E. COLE
Executive Director

DIVISION OF CONSUMER ADVOCACY

DOCKET NO. 03-0417

HAWAIIAN ELECTRIC COMPANY, INC.

SUPPLEMENTAL INFORMATION REQUESTS

INSTRUCTIONS

In order to expedite and facilitate the Consumer Advocate's review and analysis in the above matter, the following is requested:

1. For each response, the Company should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Unless otherwise specifically requested, for applicable schedules or workpapers, the Company should provide hard copies of each schedule or workpaper together with one copy of each such schedule or workpaper on electronic media in a mutually agreeable format (e.g., Excel and Quattro Pro, to name two examples); and
3. When an information request makes reference to specific documentation used by the Company to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, Company instructions, or any other relevant authoritative source which the Company used.
4. Should the Company claim that any information is not discoverable for any reason:
 - a. State all claimed privileges and objections to disclosure;

- b. State all facts and reasons supporting each claimed privilege and objection;
- c. State under what conditions the Company is willing to permit disclosure to the Consumer Advocate (e.g., protective agreement, review at business offices, etc.); and
- d. If the Company claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a-c), identify each document or electronic file, or portions thereof, that the Company claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

DOCKET NO. 03-0417

HAWAIIAN ELECTRIC COMPANY, INC.

CONSUMER ADVOCATE'S

SUPPLEMENTAL INFORMATION REQUESTS

CA-SIR-1

System Planning Criteria

Please provide copies of HECO's distribution planning criteria, which are applicable to the 46 kV system.

CA-SIR-2

Ref: System Protection – HECO March 3, 2004 Pukele Substation Outage, pages 19 - 22

- a. Does HECO utilize a Permissive Overreaching Transfer Trip (POTT) scheme on all 138 kV transmission lines on the system?
- b. If no, please provide diagrams and descriptions of other protective schemes utilized on the 138 kV transmission system.
- c. Does HECO utilize backup protection relays on the 138 kV lines?
 1. If so, identify the type (distance, directional overcurrent, etc.) of relays used and explain why these relays are used.
 2. If no, explain why not.

- d. Please provide a protection one-line diagram for each type of protection scheme utilized on the 138 kV system.
- e. Please provide a brief synopsis of each type of protection scheme utilized.

CA-SIR-3

Ref: System Protection

Please provide information regarding protection of typical 46 kV substations. This request is not meant to require HECO to complete an exhaustive effort to produce protection diagrams for each 46 kV substation. Rather, a typical one-line diagram with protection elements identified and a brief synopsis for typical substation types will be adequate.

CA-SIR-4

Ref: Response to CA-IR-22, part b.

HECO's response indicates that it would "be impractical to change from one EIS process to another EIS process mid-stream or to administer two EIS processes in parallel for the same project. The public could also perceive a company or developer's attempt to have two EISs processed simultaneously for the same objectives as trying to mislead or confuse the community." Please answer the following questions regarding the above statement:

- a. The Kamoku-Pukele Revised Final EIS indicates that the EIS can be used to support ". . . any of the other transmission line alternatives should the proposed action not

be implemented.” (Page 1-3 of Final Revised EIS.) Please explain how pursuing other transmission alternatives (i.e., the complete underground solution from Pukele to Kamoku via Palolo) would have been impractical for HECO to pursue?

- b. Please explain how pursuing two EISs could confuse or mislead the community?
- c. Are there any existing legal or other impediments that would preclude HECO from pursuing parallel projects through the same EIS, through two simultaneous EISs, or a supplemental EIS? Explain.
- d. While it is understood that HECO placed effort into pursuing other alternatives besides the partial overhead/underground Kamoku-Pukele 138 kV transmission line, does HECO now believe that it would have been prudent to pursue parallel projects to increase the chance of obtaining approval for at least one of the routes? Explain.
- e. Has HECO ever pursued an EIS(s) where parallel projects were pursued?
 1. If yes, provide copies of supporting documentation or references.
 2. In addition, what was the outcome of those projects (i.e., approved, disapproved)?

3. If no, explain why not.
- f. Is HECO aware of any other EIS(s) in which parallel projects were pursued in the State of Hawaii? If yes, provide copies of supporting documentation.
 - g. In the case where projects do not need an EIS, does HECO typically pursue parallel projects?
 1. For example, if easement, routing, or other impacts are expected to delay or stop a project, does HECO typically pursue parallel projects simultaneously to make certain that the project is not delayed or stopped?
 2. If yes, provide copies of supporting documentation or references.
 3. If no, explain why not?

CA-SIR-5

Ref: Responses to CA-IR-22, part b.

HECO's response indicates, "While the Kamoku-Pukele 138 kV Transmission Line Project (via Waahila Ridge) experienced major public opposition, there were no other compelling reasons or indications that the Board of Land and Natural Resources (BLNR) would deny the Conservation District Use Permit for Waahila Ridge." HECO continues on to reference other projects, which had potentially more significant impact on the environment (assumed in

HECO's opinion), yet were issued a CDUP. Relative to these HECO statements, please answer the following questions:

- a. Several correspondences from the BLNR, including the August 6, 1998 comments to the Draft EIS (DEIS) state opposition to the project, and indicate that HECO should first consider other existing power line routes before pursuing the Waahila Ridge route. In addition, other correspondences indicate that the existing 46 kV line required significant clearing which was a concern regarding installing the new line. Why does HECO not consider these communications as compelling reasons or indications as to why the BLNR might deny the CDUP?
- b. For the projects referenced such as the Waialua-Kuilima 46 kV Subtransmission Line project and the wind farm on Maui, did the BLNR express similar objections to these projects before issuing a CDUP? Provide copies of any supporting documentation available.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DIVISION OF CONSUMER ADVOCACY'S SUPPLEMENTAL INFORMATION REQUESTS** was duly served upon the following parties, by personal service, hand delivery, and/or U.S. mail, postage prepaid, and properly addressed pursuant to HAR § 6-61-21(d).

WILLIAM A. BONNET
VICE PRESIDENT – GOVERNMENT AND COMMUNITY AFFAIRS
HAWAIIAN ELECTRIC COMPANY, INC.
P. O. Box 2750
Honolulu, HI 96840-0001

PATSY H. NANBU
DIRECTOR – REGULATORY AFFAIRS
HAWAIIAN ELECTRIC COMPANY, INC.
P. O. Box 2750
Honolulu, HI 96840-0001

THOMAS W. WILLIAMS, JR., ESQ.
PETER Y. KIKUTA, ESQ.
GOODSILL ANDERSON QUINN & STIFEL
Alii Place, Suite 1800
1099 Alakea Street
Honolulu, HI 96813

HENRY Q. CURTIS
VICE PRESIDENT FOR CONSUMER ISSUES
LIFE OF THE LAND
76 North King Street, Suite 203
Honolulu, HI 96817

SCOTT K. SAIKI
c/o State Capitol, Room 438
Honolulu, HI 96813

KAREN H. IWAMOTO, PRESIDENT
PALOLO COMMUNITY COUNCIL
3443 Hardesty Street
Honolulu, HI 96816

TRAVER CARROLL, PRESIDENT
HOOLAULIMA O PALOLO
2525 Makaulii Place
Honolulu, HI 96816

COREY Y.S. PARK, ESQ.
PAMELA W. BUNN, ESQ.
PAUL JOHNSON PARK & NILES
1001 Bishop Street
Suite 1300, ASB Tower
Honolulu, HI 96813

DR. JEREMY LAM, PRESIDENT
MALAMA O MANOA
2230 Kamehameha Avenue
Honolulu, HI 96822

DAISY M. MURAI, SECRETARY
KAPAHULU NEIGHBORS
c/o 3039 Kaunaoa Street
Honolulu, HI 96813

DATED: Honolulu, Hawaii, November 8, 2004