

LOL-HECO-IR-36

Ref: "Prepared by: Andrew H. Stewart ... George Gela" (Exhibit 7, EDM Report, page 2)

Question(s):

- a. What part of researching the report, writing the draft report, writing the final report, editing the report, and formatting the report, etc. were the responsibilities of each author?
- b. Please provide a copy of HECO's Original Work Order, and all EDM sub-work orders.
- c. Please provide a list of all draft and final reports issued by the Project Team that are not provided in Exhibit 7.
- d. Please provide an index on all documents provided by HECO to EDM, Andrew Stewart, and Dr. George Gela.

HECO Response:

- a. Research for the report, writing the draft and editing was done by both Mr. Stewart and Dr. Gela. Writing the final report and formatting was done by Mr. Stewart.
- b. A copy of HECO's Original Work Order is attached as pages 3-26. (Please note that page 23 contains the EDM billing rate schedule, and is proprietary to EDM. This information will be provided pursuant to an appropriate protective order.)
- c. HECO objects to this request to the extent that it asks for "a list of all draft and final reports issued by [Mr. Stewart and Dr. Gela] that are not provided in Exhibit 7" for projects other than the East Oahu Transmission Project. HECO also objects to the portion of the information request which seeks a "list of all draft ... reports issued by the Project Team that are not provided in Exhibit 7". This request is unduly burdensome and onerous as compiling a list would require that HECO go back through its files to locate each iteration of Exhibit 7 to the Application (no matter how small the change that was made), as each iteration could be construed to be a "draft". Without waiving any objections, the following

are the drafts of Exhibit 7 issued by Mr. Stewart and Dr. Gela that contained substantial revisions: April 2003 draft, a July 2003 draft of the conclusions and recommendations, and August 2003 draft. There were “drafts” of Exhibit 7 that were issued subsequent to the August 2003 draft, but these drafts addressed non-substantial subjects (e.g., typographical errors, grammar errors, etc.)

As to the portion of the request that seeks a list of “final reports” issued by Mr. Stewart and Dr. Gela that are not provided in Exhibit 7”, the answer is “none”. In other words, the only final report issued by Mr. Stewart and Dr. Gela for the East Oahu Transmission Project was Exhibit 7 to the Application.

- d. Please see attached pages 27-34 for an index of the documents provided by HECO to EDM, Mr. Stewart and Dr. Gela.