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Subject Act 95 Workshops--Initial Concept Paper

Aloha Cat,

Thank you for the opportunity to participate in this important endeavor. We applaud the Commission's approach and initiative in addressing Act 95. The proposed workshops and the subsequent rulemaking proceeding are appropriate and they should facilitate public participation and the development of a complete record for the Commission. The following are our comments on the Commission's initial concept paper on electric utility rate design:

1. Renewable energy alternatives in Hawaii should include demand-side generation alternatives, such as consumer-owned photovoltaic systems and biofuel CHP systems.
2. Candidate renewable energy investments should include demand-side generation alternatives.
3. Candidate rate designs should consider the rate and fee design proposals by the County of Maui in Docket No. 03-0371, including our proposed time-of-use block rates for commercial customers and our proposed impact fees for new development.

We plan to participate in this proceeding and we are in the process of hiring an expert witness/consultant. Please feel free to contact me if you have any questions.

Kal

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