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To <Catherine.P.Awakuni@hawaii.gov>

cc

bcc

Subject Re: Act 95 Second Concept Paper and Reschedule of
Second Workshop

Aloha Cat,

Thank you for sending me the second Act 95 concept paper. My comments relate to the scope of the work. I suggest that the RPS include customer-owned renewable energy systems, especially those supported by the electric utilities via net metering and DSM programs. If customer-owned renewables are not considered in the RPS, then the electric utilities would not have an incentive to support distributed renewables on the customers' side of the meter. Equal treatment should be given to renewables on both sides of the meter because in some cases, renewables are the most cost effective on the customers' side of the meter. This is because the cost effectiveness of distributed renewables on the customers' side of the meter is based upon the higher retail price of electricity, whereas the cost effectiveness of utility-scale renewables is based upon the lower wholesale price of electricity.

Accordingly, if customer-owned renewables are included in the RPS, particularly those that are net metered or supported with DSM programs, then consideration should also be given to the establishment of impact fees, inclining block rate designs, demand response programs, and other rates and fees that support customer-owned renewables.

Please contact me if there are any follow-up questions and thank you for the opportunity to comment.

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