

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)
HAWAII ELECTRIC LIGHT COMPANY, INC.)
For Approval of a Residential)
Efficient Water Heating Program,)
Recovery of Program Costs and)
Lost Revenues, and Consideration)
for Shareholder Incentives.)

DOCKET NO. 95-0173

In the Matter of the Application of)
HAWAII ELECTRIC LIGHT COMPANY, INC.)
For Approval of a Commercial and)
Industrial Energy Efficiency)
Program, Recovery of Program Costs)
and Lost Revenues, and)
Consideration of Shareholder)
Incentives.)

DOCKET NO. 95-0174

In the Matter of the Application of)
HAWAII ELECTRIC LIGHT COMPANY, INC.)
For Approval of a Commercial and)
Industrial New Construction Program)
Recovery of Program Costs and Lost)
Revenues, and Consideration of)
Shareholder Incentives.)

DOCKET NO. 95-0175

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STATE OF HAWAII

PUBLIC UTILITIES
COMMISSION

2008 DEC 26 A 8:50

FILED

In the Matter of the Application of)
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HAWAII ELECTRIC LIGHT COMPANY, INC.)
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For Approval of a Commercial and)
Industrial Customized Rebate)
Program, Recovery of Program Costs)
and Lost Revenues, and)
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DOCKET NO. 95-0176

(CONSOLIDATED)

ORDER GRANTING IN PART AND
DENYING IN PART HELCO'S JULY 11, 2007 LETTER REQUEST

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Docket No. 95-0176

(CONSOLIDATED)

ORDER GRANTING IN PART AND
DENYING IN PART HELCO'S JULY 11, 2007 LETTER REQUEST

By this Order, the commission grants in part and denies in part the letter request filed by HAWAII ELECTRIC LIGHT COMPANY, INC. ("HELCO"),¹ on July 11, 2007, as amended on January 22, 2008, as follows: (1) the commission grants HELCO's request for approval of its proposed cumulative energy and demand savings goals for 2007 and 2008 for its energy efficiency Demand-Side Management ("DSM") programs;² (2) the commission grants HELCO's request to approve its proposed program budgets for its energy efficiency DSM programs for 2007 and 2008,

¹HELCO is a Hawaii corporation and a public utility as defined by Hawaii Revised Statutes ("HRS") § 269-1. HELCO was initially organized under the laws of the Republic of Hawaii on or about December 5, 1894. HELCO is engaged in the production, purchase, transmission, distribution, and sale of electricity on the island of Hawaii in the State of Hawaii.

²The subject DSM programs include: HELCO's Residential Efficient Water Heating ("REWH") Program; HELCO's Commercial and Industrial Energy Efficiency ("CIEE") Program; HELCO's Commercial and Industrial New Construction ("CINC") Program; and HELCO's Commercial and Industrial Customized Rebate ("CICR") Program, (collectively, "DSM programs").

including certain program modifications included in the development of the budgets; and (3) the commission denies HELCO's request for approval of its proposed DSM utility incentive cap of \$450,000 per year; and instead sets HELCO's incentive cap at \$200,000 for 2007 and 2008. In addition, the commission states that ordering paragraphs 1 and 4 of Order No. 23448, filed on May 21, 2007 ("Order No. 23448"), in Docket No. 05-0069 ("Energy Efficiency Docket"), apply to HELCO, but that ordering paragraphs 2-3 and 5-10 do not apply to HELCO, as discussed herein.

I.

Background

By Decision and Order No. 23258, filed on February 13, 2007, in Docket No. 05-0069 ("Decision and Order No. 23258"), the commission: (1) established energy efficiency goals for Hawaiian Electric Company, Inc. ("HECO"), HELCO, and Maui Electric Company, Ltd. ("MECO") (collectively, the "HECO Companies") until their next Integrated Resource Planning ("IRP") dockets; (2) selected the appropriate market structures for providing DSM programs; (3) determined the cost recovery mechanisms for utility recovery of utility-incurred DSM program costs; (4) determined the types of costs that are appropriate for utility recovery of utility-incurred DSM program costs; (5) established the appropriate DSM incentive mechanism for the HECO Companies; (6) determined that HECO's proposed energy efficiency DSM programs are likely to

achieve the energy efficiency goals and be cost-effective; (7) established the appropriate cost level for HECO's utility-incurred costs in base rates; (8) approved HECO's proposed DSM utility incentive, with modifications; (9) approved HECO's proposed energy efficiency DSM programs and Residential Customer Energy Awareness Program, with modifications; and (10) approved consideration of Hawaii Renewable Energy Alliance's Seawater Air Conditioning proposal, with modifications, under HECO's CICR Program.

By Order No. 23448, the commission granted in part and denied in part the Motion for Clarification and/or Partial Reconsideration of Decision and Order No. 23258 ("Motion for Reconsideration"), filed by the HECO Companies on March 8, 2007, as follows: (1) the commission clarified that Decision and Order No. 23258 identified cumulative megawatt ("MW")³ and megawatt-hour ("MWh") energy efficiency goals; (2) the commission granted HECO's⁴ request to restate HECO's 2007 MW and MWh energy efficiency goals to remove the impacts related to certain specified programs, subject to the corresponding exclusion of any energy and demand savings for purposes of calculating goal achievement, and denied HECO's request to approve HECO's proposed goals, as demonstrated in Tables 3 and 4 of the HECO Companies' Memorandum in Support of Motion for Reconsideration; (3) the commission

³For consistency, all kilowatt amounts and figures have been converted herein to megawatt amounts.

⁴Although the Motion for Reconsideration was filed by the HECO Companies, the various requests were made by HECO.

granted HECO's request to include the administrative and marketing costs for certain program components in the calculation of the 2007 net system benefits, and denied HECO's request to include certain other program costs in the calculation of net system benefits; (4) the commission clarified that in discussing the Existing Cost Recovery Mechanism, the term "labor costs" was intended to refer to "base labor," consistent with the HECO Companies' existing cost recovery mechanism; (5) the commission denied HECO's request for reconsideration of the commission's decision to reject HECO's flexibility request; (6) the commission denied HECO's request for flexibility to exceed its customer incentives budget and budget for expenses directly related to customer participation by 25% without commission approval; (7) the commission denied HECO's request for flexibility to shift or distribute its residential program budgets among residential programs, and its commercial and industrial program budgets among commercial and industrial programs, without commission approval; (8) the commission granted HECO the ability to request program modifications by letter request, subject to commission approval, pending the opening of a new docket; (9) the commission clarified that for purposes of calculating DSM utility incentives, the commission adopts HECO's proposed shared savings mechanism, which is calculated using the modified Utility Cost Test; and (10) the commission clarified that the net system benefits to be included in the modified Utility Cost Test should be gross of free-riders.

By letter dated July 11, 2007, HELCO requested commission "approval of its proposed: (1) cumulative energy and demand savings goals for 2007 and 2008 for its existing energy efficiency DSM programs; (2) program budgets for its existing energy efficiency DSM programs for 2007 and 2008, including certain program modifications included in the development of the budgets (these program modifications are also reflected in the cumulative energy and demand savings goals); and (3) DSM utility incentive cap of \$450,000 per year."⁵ HELCO also requested commission "confirmation that ordering paragraphs 1 and 4-10 of Order [No.] 23448 are applicable to the implementation of HELCO's energy efficiency DSM programs."⁶

II.

Discussion

A.

Energy Efficiency Goals for 2007 and 2008

In the Energy Efficiency Docket, the commission ordered that:

For the HECO Companies, until their next IRP dockets, within each utility's service territory, there will be megawatt-hour and megawatt Energy Efficiency goals for the commercial and industrial sector, and separate megawatt-hour and megawatt

⁵Letter dated and filed July 11, 2007, from HELCO to the commission, at 3.

⁶Letter dated and filed July 11, 2007, from HELCO to the commission, at 3. By letter filed January 22, 2008, HELCO updated the 2008 energy and demand savings goals for its REWH Program, as set forth in its Annual Program Modification and Evaluation ("M&E") Report, filed on November 30, 2007.

Energy Efficiency goals for the residential sector, that are each calculated based on the aggregate of the savings to be achieved by each individual program, as represented to the commission in the applications for, or requests to modify, each individual program, gross of (including) free-riders. Any revisions to the Energy Efficiency goals, or any future Energy Efficiency goals, should be established in the IRP process.⁷

Based on HECO's filings, and on Decision and Order No. 23258, as amended or clarified by Order No. 23448, the commission estimated HECO's gross Energy Efficiency goals as follows:

HECO's Energy Efficiency Megawatt-Hour Goals		
	2007	2008
Commercial and Industrial		
CIEE	46,757	70,136
CINC	19,540	29,311
CICR	25,252	37,878
Total Gross Energy Savings (MWh)	91,549	137,324
Residential		
ESH	24,938	32,080
REWH	7,533	11,300
RNC	6,045	8,867
RLI	2,633	5,267
Total Gross Energy Savings (MWh)	41,149	57,514

⁷Decision and Order No. 23258, at 143-44 (Ordering ¶ 2).

HECO's Energy Efficiency Megawatt Goals		
	2007	2008
Commercial and Industrial		
CIEE	6.878	10.318
CINC	2.864	4.297
CICR	3.299	4.948
Total Gross Demand Savings (MW)	13.041	19.563
Residential		
ESH	5.866	8.021
REWH	1.728	2.591
RNC	1.778	2.901
RLI	0.591	1.182
Total Gross Demand Savings (MW)	9.963	14.695

While Decision and Order No. 23258 addressed energy efficiency goals with respect to all of the HECO Companies, "[t]he commission was unable to estimate HELCO's and MECO's MW and MWh energy efficiency goals for illustrative purposes because neither HELCO nor MECO provided the relevant filings in this docket."⁸ By its July 11, 2007 letter, as amended on January 22, 2008, HELCO seeks to establish its energy efficiency DSM goals for 2007 and 2008 as follows:⁹

⁸Order No. 23448, at 15

⁹To be consistent with the 2007 and 2008 goals initially set by the commission for HECO and MECO, the commission declines to use the "revised" goals submitted by HELCO in subsequent filings.

HELCO's Energy Efficiency Cumulative Megawatt-Hour Goals		
	2007	2008
Commercial and Industrial		
CIEE	1,946	3,892
CINC	1,456	2,912
CICR	1,476	2,952
Total Commercial and Industrial	4,878	9,756
Residential		
REWH	1,072	2,647
Total Residential	1,072	2,647
Total Gross Energy Savings (MWh)	5,950	12,403

HELCO's Energy Efficiency Cumulative Megawatt Goals		
	2007	2008
Commercial and Industrial		
CIEE	0.283	0.566
CINC	0.165	0.330
CICR	0.196	0.392
Total Commercial and Industrial	0.644	1.288
Residential		
REWH	0.253	0.624
Total Residential	0.253	0.624
Total Gross Demand Savings (MW)	0.897	1.912

According to HELCO, the above goals reflect cumulative energy and demand savings for HELCO's energy efficiency DSM programs for 2007 and 2008, and are consistent with the impacts identified in HELCO's IRP-3 Report, filed on May 1, 2007. Specifically, Decision and Order No. 23258 approved higher customer incentive levels for HELCO's Commercial and

Industrial Energy Efficiency and Commercial and Industrial New Construction Programs, and also approved a modification to HECO's Commercial and Industrial Customized Rebate Program, which reduced the payback period from two years to one year. Consistent with Decision and Order No. 23258, HELCO asserts that the DSM program design incorporated in its IRP-3 Report included higher customer incentive levels for the CIEE and CINC Programs, and the reduced payback period for the CICR Program to achieve the forecasted energy and demand savings goals.

In addition, HELCO states that, as a result of the commission's decision in the Energy Efficiency Docket to turn over the administration of all energy efficiency DSM programs to a third-party administrator, it will not implement three new residential energy efficiency DSM programs; but "would like to offer its residential customers a key element of these new energy efficiency programs, namely offering customer incentives for the installation of compact fluorescent lamps ('CFLs')."¹⁰

Having reviewed HELCO's proposed energy and demand savings goals, the commission finds them to be consistent with Decision and Order No. 23258, as amended by Order No. 23448, and approves the goals for 2007 and 2008, as set forth above.

¹⁰Letter dated and filed July 11, 2007, from HELCO to the commission, at 4.

B.

Program Budgets and Program Modifications

HELCO also requested commission approval of its 2007 and 2008 annual program budgets, as follows:

HELCO's Proposed Energy Efficiency Annual Program Budgets		
	2007	2008
Commercial and Industrial		
CIEE	\$413,646	\$448,597
CINC	\$247,409	\$271,410
CICR	\$215,018	\$238,977
Total Commercial and Industrial	\$876,073	\$958,984
Residential		
REWH	\$1,017,222	\$1,027,379
Total Residential	\$1,017,222	\$1,027,379
Total Annual Program Budget	\$1,893,295	\$1,986,363

According to HELCO, the 2007 and 2008 annual program budgets correspond to the 2007 and 2008 energy and demand savings goals; the 2007 budgets are the same budgets that were provided in HELCO's Annual Program Modification and Evaluation Report filed on November 30, 2006; and the 2008 budgets are consistent with the budgets provided in HELCO's IRP-3 Report filed on May 31, 2007. In addition, HELCO states that the 2007 and 2008 budgets for the CIEE and CINC Programs include the higher customer incentive levels described above.

While DSM program budgets are typically included in the annual M&E Report and become effective at the beginning of

the year following the filing of the report,¹¹ the commission finds that approval of HELCO's 2007 and 2008 program budgets is appropriate and approves the budgets as set forth above, subject to the existing cost recovery process.

C.

DSM Utility Incentive Schedule and Incentive Cap

In Decision and Order No. 23258, the commission established the following DSM Utility Incentive Mechanism for HECO:

The DSM Utility Incentive Mechanism will be calculated based on net system benefits (less program costs), limited to no more than the utility earnings opportunities foregone by implementing DSM programs in lieu of supply-side rate based investments, capped at \$4 million, subject to the following performance requirements and incentive schedule. . . . In order to encourage high achievement, HECO must meet or exceed the megawatt-hour and megawatt Energy Efficiency goals for both the commercial and industrial sector, and the residential sector . . . for HECO to be eligible for a DSM utility incentive. If HECO fails to meet one or more of its four Energy Efficiency goals, . . . HECO will not be eligible to receive a DSM utility incentive. Upon a determination that HECO is eligible for a DSM utility incentive, the next step will be to calculate the percentage by which HECO's actual performance meets or exceeds each of its Energy Efficiency goals. Then, these four percentages will be averaged to determine HECO's "Averaged Actual Performance Above Goals." Finally, HECO will be awarded a DSM utility incentive in accordance with the . . . DSM Utility Incentive Schedule. . . . Except in describing the Energy Efficiency

¹¹See, e.g., Decision and Order No. 14683, filed on April 22, 1996, in Docket Nos. 94-0010, 94-0011, 94-0012 (consolidated).

goals and actual performance in terms of megawatt-hours (with no decimal places), and megawatts (with three decimal places), no rounding will occur at any point in the determination of the appropriate percentage of net system benefits to apply as the DSM utility incentive.¹²

In order to determine whether the HECO Companies have met or exceeded their respective energy efficiency goals for a given year, each company's Cumulative Actual Performance will be measured against that company's Cumulative Energy Efficiency Goals, to calculate the Cumulative Actual Performance Above Goal. Next, the Cumulative Actual Performance Above Goals will be reduced by the previous year's Cumulative Actual Performance Above Goal (which cannot be less than 0 MWh), to determine that year's Annual Actual Performance Above Goal (which cannot be less than 0 MWh). As such, the company will not receive multiple incentives for the same achievement Finally, the commission clarifies that although it will utilize the Annual Actual Performance Above Goal in the calculation of incentives attainable under the DSM Utility Incentive Schedule, if any, the commission will utilize the Cumulative Actual Performance Above Goal to determine eligibility for incentives.¹³

As set forth in Decision and Order No. 23258, HECO will be awarded a DSM utility incentive in accordance with the DSM Utility Incentive Schedule established in section III.H of the decision and order, limited to no more than the utility earnings opportunities foregone by implementing DSM programs in lieu of supply-side rate based investment capped at \$4 million.

HELCO requests commission approval of an annual cap on its DSM utility incentive of \$450,000. According to HELCO,

¹²Decision and Order No. 23258, at 102-04.

¹³Order No. 23448, at 8-9.

"[i]n determining the annual cap, HELCO used a simplified method of scaling its utility incentive cap to HECO's annual cap of \$4 million, based on the ratio between HELCO and HECO's MW and MWh impacts for similar efficiency programs (approximately 11.1% of \$4 million)."¹⁴ While the commission agrees that a ratio between HELCO's and HECO's MW and MWh impacts should be utilized, it disagrees that the calculation should be limited to the programs that both HELCO and HECO implement in common.

HECO's incentive cap of \$4 million is based on all of its commercial and industrial and residential programs. In calculating its proposed cap, HELCO, however, only included the programs that were similar between HECO and HELCO; excluding the analogous HECO programs that HELCO has not implemented, which in the commission's estimation unfairly rewards HELCO for achieving less of its proportionate energy and demand savings. As HELCO is requesting goals that will allow it to achieve less energy and demand savings than HECO, its incentive cap should be lower in proportion to the energy and demand savings goals set for HECO. Accordingly, the commission finds it appropriate to set HELCO's incentive cap as a ratio between all of HECO's programs and all of HELCO's programs. To do so, the commission added each of HECO's and HELCO's MW and MWh program goals to derive HELCO to HECO ratios for the 2007 MWh goals, 2008 MWh goals, 2007 MW goals and 2008 MW goals. The average of the four ratios was .05%, which the commission then multiplied by

¹⁴Letter dated and filed July 11, 2007, from HELCO to the commission, at 7.

HECO's incentive cap of \$4 million, resulting in an incentive cap of \$200,000.

As discussed below, the incentive cap of \$200,000 applies to 2007 and 2008.

	2007		HELCO to HECO Ratio	2008		HELCO to HECO Ratio
	HECO	HELCO		HECO	HELCO	
MWh Goals						
Commercial and Ind.						
CIEE	46,757	1,946		70,136	3,892	
CINC	19,540	1,456		29,311	2,912	
CICR	25,252	1,476		37,878	2,952	
Residential						
ESH	24,938	0		32,080	0	
REWH (including SSP)	7,533	1,072		11,300	2,647	
RNC	6,045	0		8,867	0	
RLI	2,633	0		5,267	0	
Total (Comm + Res)	132,698	5,950	0.044839	194,839	12,403	0.063658

	2007		HELCO to HECO Ratio	2008		HELCO to HECO Ratio
	HECO	HELCO		HECO	HELCO	
MW Goals						
Commercial and Ind.						
CIEE	6.878	0.283		10.318	0.566	
CINC	2.864	0.165		4.297	0.330	
CICR	3.299	0.196		4.948	0.392	
Residential						
ESH	5.866	0.000		8.021	0.000	
REWH (including SSP)	1.728	0.253		2.591	0.624	
RNC	1.778	0.000		2.901	0.000	
RLI	0.591	0.000		1.182	0.000	
	23.004	0.897	0.038993	34.258	1.912	0.055812

Average of the four ratios = 0.05^{15}
HELCO Cap based on \$4 million HECO Cap = \$200,000¹⁶

¹⁵ $(0.044839 + 0.063658 + 0.038993 + 0.055812) \div 4 = 0.050826$

¹⁶ $0.05 \times \$4,000,000 = \$200,000.$

For 2009, pursuant to the Order Setting the Public Benefits Fee Surcharge for 2009, filed on December 15, 2008, in Docket No. 2007-0323 ("PBF Surcharge Order"), the commission reduced HECO's incentive cap to \$2 million, and stated that "HELCO's cap should be lowered accordingly."¹⁷ Accordingly, HELCO's incentive cap for 2009 is \$100,000. In addition, HELCO's 2009 incentive cap is also subject to being prorated based on the number of months in 2009 that HELCO does not provide programs.¹⁸

D.

Applicability of Order No. 23448

HELCO requests that the commission confirm that ordering paragraphs 1 and 4-10 of Order No. 23448 are applicable to the implementation of its energy efficiency DSM programs. Ordering paragraphs 1 and 4 apply to all of the HECO Companies. In contrast, ordering paragraphs 2-3 and 5-10 address specific requests made by HECO. Accordingly, only ordering paragraphs 1 and 4 of Order No. 23448 apply to HELCO, and ordering paragraphs 2-3 and 5-10 do not apply to HELCO. This does not mean, however, that HELCO is entitled to, for example, budget flexibility as was denied to HECO in ordering paragraph 5; indeed, HELCO may assume that the commission would rule consistently in accordance with its past decisions.

¹⁷PBF Surcharge Order, at 13.

¹⁸PBF Surcharge Order, at 13 and 15.

III.

Orders

1. HELCO's request for approval of its proposed cumulative energy and demand savings goals for 2007 and 2008 for its existing energy efficiency DSM programs is granted.

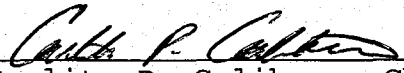
2. HELCO's request for approval of its proposed program budgets for its existing energy efficiency DSM programs for 2007 and 2008, including certain program modifications included in the development of the budgets, as discussed herein, is granted.

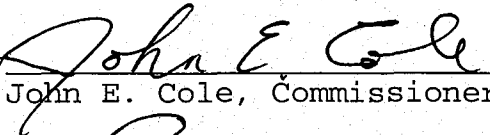
3. HELCO's request for approval of its proposed DSM utility incentive cap of \$450,000 per year is denied; HELCO's incentive cap is \$200,000 for 2007 and 2008 only. HELCO's 2009 incentive cap shall be lowered in proportion to the reduction in HELCO's 2009 incentive cap and prorated based on the number of months in 2009 that HELCO does not provide DSM programs.

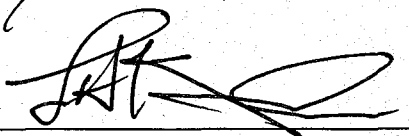
4. Ordering paragraphs 1 and 4 of Order No. 23448 apply to HELCO, and ordering paragraphs 2-3 and 5-10 do not apply to HELCO, as discussed herein.

DONE at Honolulu, Hawaii DEC 26 2008.

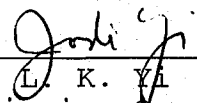
PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

By 
Carlito P. Caliboso, Chairman

By 
John E. Cole, Commissioner

By 
Leslie H. Kondo, Commissioner

APPROVED AS TO FORM:


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95-0173, 95-0174, 95-0175, 95-0176 (CONSOLIDATED).laa

CERTIFICATE OF SERVICE

The foregoing order was served on the date of filing by mail, postage prepaid, and properly addressed to the following parties:

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