

Ulupono Initiative
999 Bishop St., Suite 1202
Honolulu, HI 96813

P (808) 544-8960
F (808) 432-9695
E info@ulupono.com

ulupono.com

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The Honorable Chair and Commissioners
Public Utilities Commission
465 South King Street, #103
Honolulu, Hawai'i 96813

Re: Docket No. 2014-0135 - For an Order Approving the Green
Infrastructure Loan Program

Dear Chair Asuncion and Commissioners:

Ulupono Initiative LLC ("Ulupono") is pleased to submit its comments in support of the application by the Hawaii Green Infrastructure Authority (the "HGIA") to the Public Utilities Commission (the "Commission") to approve an enhancement to the HGIA's Green Energy Money Saver ("GEM\$") On-Bill Program to enable it to finance community-based renewable energy ("CBRE") projects in the State, as proposed and described in HGIA's Program Notification No. 15 for the Green Infrastructure Loan Program, filed in Docket No. 2014-0135 on August 12, 2022. Ulupono is an intervenor in the CBRE Docket No. 2015-0389, and has worked extensively with the parties and participants in that docket to help fashion the CBRE tariff and the documentation to implement both Phase 1 Phase 2 of the CBRE program. In this way, Ulupono has sought to assist the Hawaiian Electric companies as well as the Commission, the Consumer Advocate, other stakeholders, energy developers, and communities to support and facilitate the development of CBRE projects.

Pursuant to Act 100 (SLH 2015), the Commission approved Hawaiian Electric's CBRE tariffs for each of its service territories to make the benefits of renewable energy generation more accessible to a greater number of Hawai'i residents and businesses who would otherwise be unable to directly participate in renewable energy generation for various reasons. Act 100, Section 1. Further, in Phase 2 of the CBRE program, special emphasis is being given to developing CBRE programs for low- and moderate-income ("LMI") customers on all islands, and special requests for proposals have been issued for Molokai and Lanai potential subscribers.

Of particular interest to Ulupono is the CBRE project being developed on Molokai by the grass-roots organization Ho'āhu Energy Cooperative Moloka'i ("HECM") with Maui Electric Company, Limited ("MECO").



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Ulupono has been working with HECM on its CBRE project and is especially encouraged and supportive of this effort because it is a community-based organization comprised of dedicated residents committed to renewable energy development, affordable energy prices, extensive community involvement in the planning for and implementation of this project, and the achievement for their community of energy equity. A major challenge for this community, and for many communities on all islands in the State, is that these communities have many LMI residents and utility customers, and it is difficult for many of them to participate in, and be benefitted by, these types of programs, including the CBRE program, notwithstanding the goals of Act 100 and the CBRE tariff and program.

For this reason, Ulupono is very interested in the HIGA's proposal to enhance its GEM\$ On-Bill Program by extending this program to help finance CBRE projects and enable Hawai'i residents, especially LMI residents, to subscribe for, and participate in, these CBRE projects. This would clearly support and assist HECM in developing its CBRE project with MECO and enable Molokai resident, especially LMI customers, to participate in, and benefit from, HECM's CBRE project. This has special significance for Molokai residents, which continue to be burdened with the highest electricity rates in our State. Moreover, the application of the GEM\$ On-Bill Program to help finance CBRE projects, especially in LMI communities, would promote not only Act 100's goals but also the overarching State clean energy goals and be an effective demonstration of energy equity that the Commission is currently exploring in its Docket No. 2022-0250.

For these reasons, Ulupono very strongly recommends that the Commission favorably consider the HIGA's application to permit the GEM\$ On-Bill Program to be available to finance CBRE projects, including the HECM CBRE project on Molokai. Ulupono's active participation in the Commission's CBRE Docket No. 2015-0389 has been aimed, among other objectives, to help encourage LMI customers to be able to participate in, and benefit from, these CBRE projects. We offer this support and look forward to continued and fruitful cooperative efforts with the Commission, Hawaiian Electric, HGIA, and the stakeholders (including the HECM) involved in these efforts.

Ulupono appreciates the Commission's consideration of the foregoing.

Sincerely yours,



Murray Clay
President



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