

JOSH GREEN, M.D.  
GOVERNOR

SYLVIA LUKE  
LT. GOVERNOR



**STATE OF HAWAII**  
**PUBLIC UTILITIES COMMISSION**  
465 S. KING STREET, #103  
HONOLULU, HAWAII 96813

LEODOLOFF R. ASUNCION, JR.  
CHAIR

NAOMI U. KUWAYE  
COMMISSIONER

COLIN A. YOST  
COMMISSIONER

Telephone: (808) 586-2020  
Facsimile: (808) 586-2066

Website: [puc.hawaii.gov](http://puc.hawaii.gov)  
E-mail: [puc@hawaii.gov](mailto:puc@hawaii.gov)

October 31, 2023

Kevin M. Katsura  
Director, Regulatory Non-Rate Proceedings  
Hawaiian Electric Company, Inc.  
[Kevin.katsura@hawaiianelectric.com](mailto:Kevin.katsura@hawaiianelectric.com)

Re: Double Pole Removal, Hawaii Electric Company, Inc. Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited ("Double Pole Removal Status").

Dear Mr. Katsura:

The Commission is preparing a report to the Hawaii State Legislature to address House Concurrent Resolution 41, Session Laws Hawaii 2023, ("HCR 41") and House Resolution 45, Session Laws Hawaii 2023 ("HR 45"), removal of double poles. To assist in the Commission's efforts, please submit responses to the enclosed questions by November 30, 2023, along with a fully completed Attachment A, Concurrence Sheet.

Additionally, within ten (10) calendar days of November 30, 2023, the Commission instructs Hawaiian Electric Company, Inc. Hawai'i Electric Light Company, Inc., and Maui Electric Company, Limited (collectively known as "Hawaiian Electric", or "the Companies") to coordinate and facilitate a status update meeting with all stakeholders on their work and plans to meet the Companies' 10-year goal<sup>1</sup> to bring the double pole backlog to zero.

The Commission stresses that this status update meeting is necessary for the Commission to obtain information from all double pole stakeholders, including Hawaiian Electric and Hawaiian Telcom, to accurately report back to the Legislature on HCR 41 and HR 45. Hawaiian Electric is expected to prepare an agenda, notify and invite all Attachers (Pole Owners, Hawaiian Telcom (HT), right-of-way attachers, and 3<sup>rd</sup> party renters) and other stakeholders (including the Consumer Advocate or "CA" and the Commission), and facilitate the status update meeting.

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<sup>1</sup> On page 23 of the Companies' application filed in Docket No. 2018-0075, Hawaiian Electric committed to performing a minimum of 1,000 standard transfers and double pole removals per year. In addition, Hawaiian Telcom committed to performing a minimum of 50 non-standard transfers and double pole removals per year. Along with these commitments, the Companies stated that "[t]he double pole backlog will be brought to net zero within ten years."

The Commission provides the following guidance to assist Hawaiian Electric in developing the meeting agenda:

- Hawaiian Electric is requested to present highlights of the Double Pole Removal Update report provided to the Commission on October 27, 2023 and Hawaiian Electric's responses to questions from the Commission (see attached).
- Hawaiian Electric is requested to allow all other Attachers to voice their concurrence or feedback on the presentation and or Hawaiian Electric's responses submitted to the Commission.
- Hawaiian Electric is encouraged to discuss their plans to modify current processes and procedures to achieve their committed removal of double poles.
- Hawaiian Electric is requested to allow for questions to be asked by all participating stakeholders, providing answers to the best of their knowledge at the status conference.

The Commission instructs Hawaiian Electric to utilize the Commission's Hearing Room for the status update meeting and strongly encourages that Hawaiian Electric's staff attend in person as available, or remotely if necessary. The Commission will live stream the meeting through the Commission's YouTube Account and will provide a WebEx meeting invite to allow for remote participation. Hawaiian Electric must notify the Commission at least two weeks in advance of the scheduled meeting date, and should inform invited stakeholders at least one week in advance with a formal invite. Although the Commission encourages stakeholders' in person participation, stakeholders may also attend remotely through WebEx.

The Commission expressly allows members of the public to either observe the meeting through the Commission's YouTube live stream or listen in person at the Commission's Hearing Room gallery. Members of the public may provide Public Comment on this topic by referencing "Double Pole Removal 2023" via the following methods:

- Postal mail to:  
State of Hawaii  
Public Utilities Commission  
465 South King Street, Room 103  
Honolulu, Hawaii, 96813
- In person written comment; or
- Online at <https://hpuc.my.site.com/cdms/s/consumers/public-comments>.

For any procedural questions such as those around meeting coordination, slides, or any requests by the Companies or invited stakeholders, please contact Andrew Okabe at [Andrew.J.Okabe@hawaii.gov](mailto:Andrew.J.Okabe@hawaii.gov) or (808) 586-2020.

Special accommodations for persons with disabilities can be made if requested reasonably in advance by contacting the Commission's Honolulu Office.

Thank you for your assistance.  
Sincerely,



Grace E. Relf  
Chief of Policy and Research

Enclosure

c: Email Service to Hawaiian Electric  
Email Service to the Consumer Advocate's Office -

HCR 41 / HR 45 (SLH 2023) - Double Pole Removal  
Hawaiian Electric Company, Inc. Hawai'i Electric Light Company, Inc., and Maui Electric  
Company, Limited ("Hawaiian Electric" or "Companies")  
Questions

General Instructions

Unless otherwise directed, all responses to these Questions that concern or require tabular or graphic representations of data should include the data in an electronic spreadsheet file compatible with MS Excel. All spreadsheet files provided in the responses to these Questions should be provided in live or dynamic format with cell logic, references, calculations, and formulas intact; and all cell unhidden and unprotected.

**QUESTION-01**

According to the Hawaiian Electric Double Pole Removal Update dated 10/27/2023 (Double Pole Removal Update), "Hawaiian Electric" or "the Company" is responsible for removing double poles on the five islands that Hawaiian Electric serves. Please clarify if there is only one department in the Company that is overall responsible for double pole removal on all five islands, or if there is a separate department for each of HECO, MECO, and HELCO. In either case, please provide a single department and single point of contact who represents the Company, who can provide status and responses to questions regarding this effort.

**QUESTION-02**

Please identify all current company-maintained databases used to track double poles. For each database, please include a brief description of what is included in the database and how/when updates are done.

**QUESTION-03**

Please provide the information in the following Data Tables:

	<b>Summary of All Double Poles</b>	<b>HECO</b>	<b>MECO</b>	<b>HELCO</b>	<b>Total</b>
1	# of Double poles requiring a standard transfer by Hawaiian Telcom (HT)				
2a	# of Double poles requiring a non-standard transfer by the County				
2b	# of Double poles requiring a non-standard transfer by State of Hawaii				
3	# of Double poles requiring a non-standard transfer by a Renter (an attacher who is NOT an Owner)				
4	# of Double poles to be removed that have NO attachments remaining				
5	Other categories of poles that contribute to Total # Double poles, if any. Please provide a list at the end of this table.				
6	<b>TOTAL # of Double poles presently, as of __/__/2023 (The Company to fill in the date)</b>				
7	Out of total double poles (100%), the estimated average percentage of double poles that require a standard transfer and the estimated average percentage of poles that require a non-standard transfer *See Note A below				
8	Total # of double poles at start of 10-year period based on the Companies' field audit in June 2018 (10-year period from October 2018 to October 2028)				
9	Total # of double poles removed since the start of the 10-year period.				
10	Estimated # double poles added each year *See Note A below				

\*Note A: Provide basis for the estimate.

**QUESTION-04**

Please also provide this information, which should provide an idea of how many poles are in each stage of the process.

- a. **Standard Transfers (HE contractor performs the transfer and removes the double pole)**

Poles Requiring Standard Transfers	Number of Poles in Each Stage			
	Note: Each pole should be counted in only one of the stages below			
Company	The Company has not hired the Contractor yet (A)	Contractor hired, but is waiting for HT to provide materials for the transfer (B)	Contractor work in progress – The Company is waiting for Contractor’s notification that transfer was complete and pole was removed (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO				
MECO				
HELCO				
<b>Total</b>				

- b. **Non-Standard Transfers (Each attacher performs the transfer and either removes or has the electric utility remove the double pole)**

Poles requiring non-standard transfers	Number of Poles in Each Stage			
	Note: Each pole should be counted in only one of the stages below			
Company	The Company to send First Notification to Attachers (A)	Transfer work in progress – The Company is waiting for Attacher’s notification that transfer was complete and pole was removed (B)	Transfer was complete but waiting for The Company to remove the pole (C)	Total (A+B+C) Note: this should be equal to the total number of Double Poles
HECO				
MECO				
HELCO				
<b>Total</b>				

### **QUESTION-05**

For each service territory and for each of the following: a) standard transfers, which can be coordinated and performed by the Company and its contractors, b) non-standard transfers needed by POLE OWNERS, c) non-standard transfers needed by RIGHT OF WAY ATTACHERS, and d) non-standard transfers needed by RENTERS:

- a. Please outline the process and steps involved with the removal of the double pole, up to the final step of formally removing the double pole from the double pole count.
- b. Please list all attachment owners and types of attachments. Define authorized attachers and renters.

### **QUESTION-06**

At the virtual meeting held on October 19, 2023 ("October meeting"), HECO stated numerous challenges of having the Owners and Renters respond to HECO's requests. For example, 1) HT often does not have the materials required for HECO's contractor to perform a standard transfer, 2) HECO often does not receive notification when a pole transfer is completed by the Owner or Renter.

- a. For the Companies, please provide a list of penalties, or actions that each can take based on the most current Pole Attachment Agreements, Joint Pole Agreements, and any other contracts with Hawaiian Tel. Cite the references.

### **QUESTION-07**

Please identify all notification and enforcement options currently available to the Companies (e.g., from Master License Agreements, FCC rules/complaint). Have the Companies explored other options to expedite the timely transfers of all attachments? If so, please identify and explain these efforts.

### **QUESTION-08**

Do the Companies currently enforce any or all of the current penalties or actions to ensure response and action by the other Pole Owners and Attachers? Why or why not?

### **QUESTION-09**

Specifically, is there currently a contract or agreement that considers an attachment "a breach of contract" or "unauthorized" if a Pole Owner or Renter is unresponsive to the Companies' pole transfer requests?

### **QUESTION-10**

At the October meeting, HECO stated that it currently uses O&M and Removal funds to remove double poles. HECO also stated the cost to fund the pole transfers is not sufficient to cover the costs. For the Companies, please discuss whether removing the remaining double poles is in the budget for the next 5 years. If double pole removals have been budgeted, please provide how much is in the budget for each service territory. If it is already known that the budgeted amount will be insufficient, please discuss the Companies' plans to remedy this insufficiency.

### **QUESTION-11**

If after the completion of Data Table item 4 (number of double poles that have NO remaining attachments) there are double poles with no remaining attachments, please discuss the reasons or challenges for delays in the removal of these poles.

### **QUESTION-12**

At the October meeting, HECO stated that it is very difficult to obtain the actual double pole counts and status, in both the Joint Pole Database and the PI Database. Also, that HECO, MECO, and HELCO each maintain their own records in these two databases. According to Docket 2018-0075, HECO planned to acquire a consultant to provide the actual count of double poles. Please describe the Companies' plans to upgrade and/or consolidate both databases to monitor the double pole counts and status?

### **QUESTION-13**

At the October meeting, per HECO, the current double pole count (standard transfers only) for all islands is 6,604, which amounts to over 1,300 double pole removals per year. However, this number does not include double poles requiring non-standard transfers, double poles that are bare and pending HECO removal, and new double poles that are added each year.

- a. With consideration of the number of pole removals completed in the past 5 years, what assurances can the Companies give to the PUC that the remaining balance of double poles can be removed within the next 5 years?
- b. If the Companies continue "business as usual" regarding removal of double poles, do each of HECO, MECO and HELCO commit to meeting the goal of removing ALL double poles (as provided in the October 27, 2023 report) within the remaining 5 years?
- c. If the answer is no, then what new or future improvements, programs, actions, or updates to the contracts/agreements to invoke penalties, etc., are the Companies planning to implement to ensure this goal is met?

### **QUESTION-14**

At the October meeting, HECO discussed the discrepancies of the actual initial double pole count of 14,000 (see Docket No. 2018-0075) for the Companies. Given the audit performed, please confirm the actual number of double poles that the Companies finally committed to being removed within the 10-year period.



**QUESTION-15**

Do the Companies have a preference for how to publicly provide status of the joint poles (number removed, balance remaining, for example) , such as within a publicly available status conference that allows for public comment, or a webpage on the Companies' websites that specifically provides information as it is known to the Companies?

**QUESTION-16**

Please provide the following questions to all of the entities who are pole Attachers (pole owners, right of way attachers, and 3<sup>rd</sup> party renters). Collect and include each entity's responses as part of your responses to the Commission's questions:

- a. How many non-standard transfers have HECO, MECO, or HELCO sent you requests for, that have not been completed yet?
- b. After receiving the electric utility's notification of a pole transfer request, what is your average response time to perform the transfer? Are you also responsible for removing the pole after you have completed the transfer?
- c. If the electric utility is responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed your transfer? What is the average time after the transfer that you provide notification?
- d. If you are responsible for removing the pole after you have completed the transfer, do you notify the electric utility when you have completed the transfer and removed the double pole? What is the average time after the pole removal that you provide notification?

**QUESTION-17**

Upon completion of responses to these questions, the Companies shall have all of the entities who are pole Attachers (pole owners, right of way attachers, and 3<sup>rd</sup> party renters), review the final Report of HECO's Responses to the Commission Regarding Double Poles, and sign Attachment A, Concurrence Sheet. Attachment A with signatures and attachments submitted by the entities shall be included in the final report of responses to the Commission.