

**UNITED STATES OF AMERICA  
BEFORE THE  
DEPARTMENT OF ENERGY**

**Notice of Request for Information (RFI) on            )**  
**Ensuring the Continued Security of the United    )**  
**States Critical Electric Infrastructure                )**

VIA EMAIL  
[ElectricSystemEO@hq.doe.gov](mailto:ElectricSystemEO@hq.doe.gov)

**COMMENTS OF HAWAIIAN ELECTRIC COMPANY, INC.**

Hawaiian Electric Company, Inc. (“Hawaiian Electric”) is the largest electric utility serving the State of Hawai‘i, with operations on O‘ahu, Maui, Moloka‘i, Hawai‘i, and Lāna‘i. Hawaiian Electric serves these various islands itself and through the wholly owned subsidiaries Maui Electric Company, Ltd. (service on Maui and Moloka‘i), and Hawai‘i Electric Light Company, Inc. (service on the Island of Hawai‘i) (all referred to collectively as “Hawaiian Electric”). Hawaiian Electric is a member of the Edison Energy Institute (“EEI”) and relies on the knowledge and opportunity to share ideas that membership in EEI provides. EEI has stated its position in response to the Request for Information (“RFI”) issued by the Department of Energy (“DOE”) on April 22, 2021 in comments separately provided to the DOE. Hawaiian Electric is aligned with EEI’s position stated in EEI’s comments.

Hawaiian Electric is vertically integrated and is unique from other large utilities in the United States because Hawaiian Electric because its facilities are not interconnected to any neighboring service territory like the grid on the mainland. Electric demand on each island can

only be served by generation resources located on that island. Because Hawaiian Electric is remote, supply chain impacts are exacerbated for Hawaiian Electric in a way that does not impact other members of EEI. For this reason, Hawaiian Electric has determined that providing its own comments, as set forth in this correspondence, is necessary so that Hawaiian Electric's unique position can be considered by the DOE.

**I. Hawaiian Electric does not object to a prohibition order.**

Hawaiian Electric supports national security interests and understands the importance of the electrical system to Critical Defense Facilities and other critical community facilities located within the State of Hawai'i.

Hawaiian Electric takes pride in its mitigation efforts to reduce vulnerabilities to the Hawaiian Electric system, no matter who is served. In order to understand what vulnerabilities are being addressed by the January 16, 2021 Prohibition Order ("Prohibition Order") or a future prohibition order, having access to the intelligence gathered during the process of creating the Prohibition Order would help Hawaiian Electric identify and understand the primary risks and vulnerabilities to the bulk power system of which Hawaiian Electric should be aware. Not having this information puts Hawaiian Electric and other utilities at a disadvantage.

**II. A blanket prohibition order will have a greater impact on Hawaii compared to utilities located on the contiguous U.S.**

Hawaiian Electric is leading the nation in the implementation of renewable energy. The State of Hawai‘i has set a statutory goal of attaining a 100% Renewable Portfolio Standard by the year 2045. Accordingly, to meet these goals, Hawaiian Electric will review and implement novel solutions that have not been used throughout the rest of the nation, which Hawaiian Electric will deploy quickly in order to maintain reliable service to our customers. A blanket prohibition order that restricts certain sources of supply may delay the implementation of these solutions.

Because the State of Hawai‘i is remote from the rest of the nation, on a day-to-day basis, Hawaiian Electric has a longer and more complex supply chain for the materials and equipment needed to support utility operations. Because of this, Hawaiian Electric operates with less options for the sourcing and transport of materials and equipment and has a greater risk of delays in obtaining materials and supplies. A blanket prohibition order that cuts off available sources of supply for Hawaiian Electric will likely result in delays to existing and future renewable energy projects.

Hawaiian Electric has a finite number of resources. The January 16, 2021 Prohibition Order, as originally drafted is unclear regarding the required level of effort necessary to comply with the order. On its face, the Prohibition Order appears to restrict the acquisition of large bulk power system components, but it is unclear if the many intricate components, sub-components, and individual parts that make up large bulk power system components are also included in the

Prohibition Order. For example, while it is clear that the purchase of 69 kV or larger power transformers may be prohibited, the Prohibition Order does not specify whether the parts and components that comprise the transformers, which are likely sourced from multiple suppliers, must also meet the Prohibition Order's requirements. In other words, it remains unclear under the Prohibition Order whether a utility is permitted to purchase a 69 kV transformer manufactured in Canada that is comprised of parts supplied from one of the countries subject to the Prohibition Order. Must Hawaiian Electric track each part and component of the 69 kV transformer to ensure compliance? If so, because utilities are subject to the Prohibition Order but not vendors, utilities would then have to engage individual vendors to ensure that all parts used for purchased bulk power equipment meet the Prohibitions Order's requirements. This exercise would be counter-productive for Hawaiian Electric, which already needs to obtain materials and supplies as expeditiously as possible.

### **III. Hawaiian Electric's suggestions in light of its comments.**

In order to address Hawaiian Electric's comments stated herein, Hawaiian Electric suggests the DOE consider the following:

- a. Engage and communicate with key utility vendors who supply bulk power equipment, and provide compliance requirements that the vendors must meet in order to comply with the intent of the Prohibition Order;

- b. Consider applying the Prohibition Order to key utility vendors as well, and/or provide vendors the opportunity to self-certify compliance or to be certified by the DOE , so that utilities can purchase components subject to the Prohibition Order (or a future prohibition order) with confidence;
- c. Provide a database available to all utilities that identifies all vendors that have met compliance requirements; and
- d. Specify with particularity the scope of the Prohibition Order, and conversely communicate what is not within the scope of the Prohibition Order.

Hawaiian Electric appreciates the opportunity to provide feedback and information regarding this request. Due to our unique circumstances, we stand ready and willing to serve as an industry partner as plans and details are contemplated by DOE.

Respectfully submitted,

*/s/ Colton K. Ching*

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