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August 5, 2026

Kevin M. Katsura
Director, Regulatory Non-Rate Proceedings
Hawaiian Electric Company, Inc.,
kevin.katsura@hawaiianelectric.com
Regulatory@hawaiianelectric.com

Re: Docket No. 2026-0001, Proceeding to Investigate Integrated Grid Planning Second Cycle, Response to Hawaiian Electric Company, Inc.'s Request to Open a New Proceeding and Establish an Expedited Process for Approval of a Concurrent Firm Generation Request for Proposals for Oahu, Filed on July 17, 2026, in Non-Docketed Case No. PC-210789

Dear Mr. Katsura:

On July 17, 2026, Brendan S. Bailey, Vice President of Resource Procurement, submitted a letter requesting that the Commission: (1) open a new proceeding for the review and approval of a request for proposals ("RFP") for approximately 500 megawatts ("MW") of fuel-flexible firm generation ("Firm RFP") on O'ahu; (2) fold this Firm RFP request into the IGP RFP; or (3) address the request through a waiver from the competitive bidding framework ("HECO's Request").¹ Hawaiian Electric asked that this Firm RFP be administered concurrently with the Companies' Integrated Grid Planning Request for Proposals ("IGP RFP") and for an expedited procedural schedule allowing approval and issuance of the Firm RFP by the end of 2026.²

The Commission notes that HECO's request and the Commission's response do not constitute formal docket proceeding pleadings. Based upon HECO's letter request for formal Commission action, it is the Commission's opinion that it is not reasonable and in the public interest to open a docket or otherwise expedite review and approval of HECO's Firm RFP request at this time, **without the identification of need for an additional**

¹Letter from Hawaiian Electric Company, Inc. ("Hawaiian Electric" or "HECO") to Request to Open a New Proceeding and Establish an Expedited Process for Approval of a Concurrent Firm Generation Request for Proposals for Oahu, filed on July 17, 2026 at 1 (Non-Docketed Case No. PC-210789).

²See Docket No. 2024-0258, Decision and Order No. 42665, issued on June 17, 2026 ("Order 42665").

500 MW of fuel-flexible firm generation on O‘ahu. Without a demonstration of need, such a request can have far-reaching consequences, not only for O‘ahu customers, but for the State of Hawai‘i. The Commission also notes that the resolution of such crucial issues must consider substantial stakeholder feedback, transparency and thoroughness within the determinative processes.

The Commission further notes that Hawaiian Electric is currently negotiating with two companies for 307 MW of firm capacity on O‘ahu, through the Stage 3 RFP.³ Additionally, the Commission has recently approved the Waiau Repower Project⁴, which will replace the existing Waiau firm generation with 253 MW of firm generation. As a result of the recently approved IGP RFP, based on grid needs and system resources, an additional 81 MW of firm generation has been identified for O‘ahu. The Commission acknowledges the potential benefit of additional firm and flexible resources, however, Hawaiian Electric must explain how the proposed 500 MW fuel-flexible firm generation aligns with the IGP Action Plan Annual Update, filed on June 30, 2026⁵, and provide an analysis of system capacity and reliability needs, including evaluation of resource adequacy, load forecasting, frequency response requirements, and transmission constraints that would establish a need beyond the firm capacity that was identified and vetted in recent proceedings. Without thorough analyses and consideration of collaborative stakeholder engagement, it would be imprudent for the Commission to consider instigating a significant procurement request. With respect to the request for an expedited procedural schedule, given the ongoing planning and procurement efforts, the Companies must provide reasonable justification for the urgency of procuring an additional 500 MW of firm capacity on O‘ahu.

Therefore, the Commission declines Hawaiian Electric’s request for the Commission to: (1) open a new proceeding for the Firm RFP, including establishing an expedited schedule allowing approval by the end of 2026; (2) fold this Firm RFP request into the IGP RFP; or (3) address the request through a competitive bidding framework waiver. The Commission may reassess its position if Hawaiian Electric addresses the concerns and requested information stated in this letter, including but not limited to, providing relevant analyses that demonstrate O‘ahu’s need for additional firm capacity beyond the currently identified capacity.

³<https://www.hawaiianelectric.com/clean-energy-hawaii/our-clean-energy-portfolio/renewable-project-status-board>.

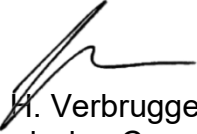
⁴See, *generally*, Docket No. 2025-0211, Decision and Order No. 42411, issued on March 23, 2026.

⁵See, *generally*, Docket No. 2026-0001, Integrated Grid Plan Action Plan Annual Update, filed June 30, 2026.

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If you have any questions, do not hesitate to contact me, at julia.h.verbrugge@hawaii.gov or at 808-586-2020.

Sincerely,



Julia H. Verbrugge
Commission Counsel

JHV:ljc

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