High Penetration of Distributed Solar PV Generation

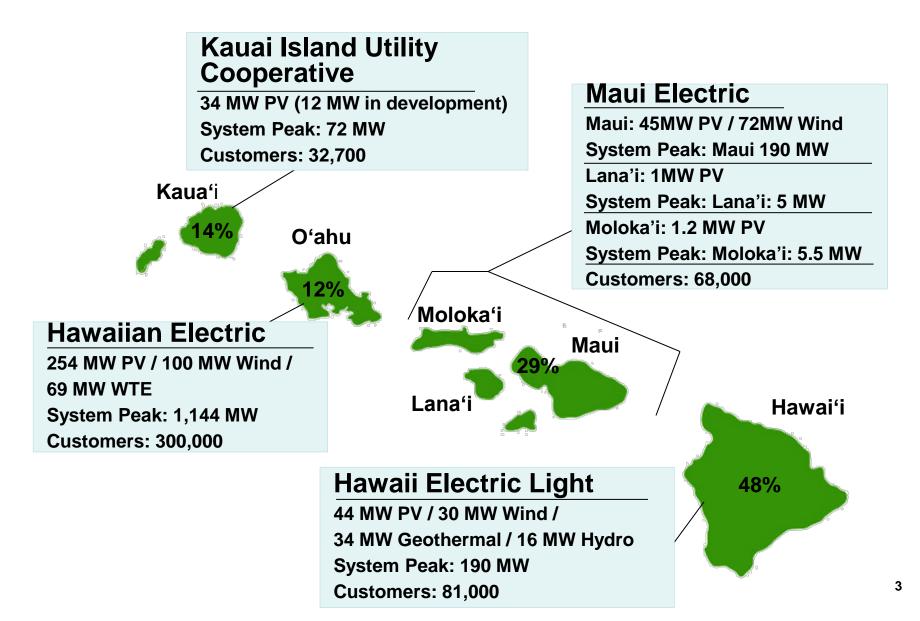
Lessons Learned from Hawaii

September 30, 2014

Solar PV penetrations trends in Hawaii

Lessons learned from Hawaii's high penetration of solar PV

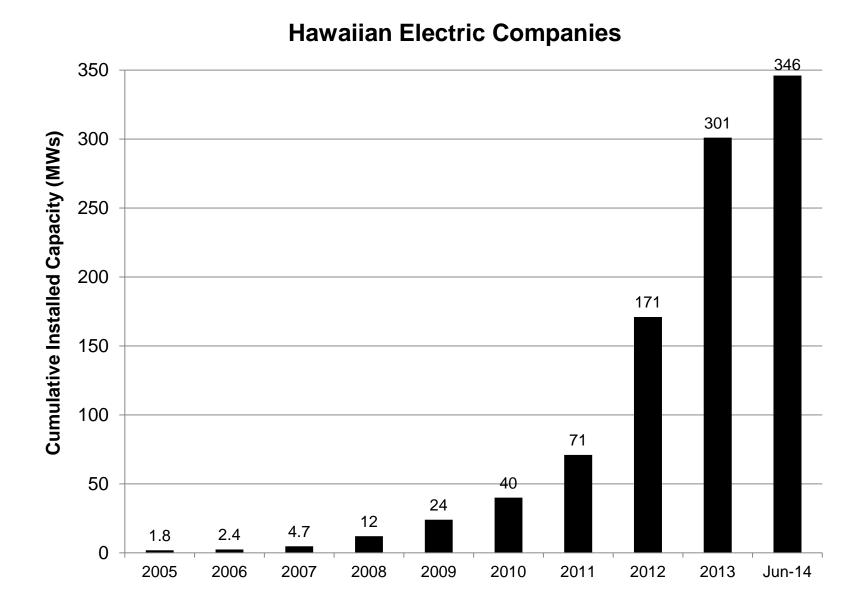
Need for new distributed solar PV business model and DER 2.0



Hawaii leads the nation in the penetration of residential rooftop solar PV systems and as a result, is at the forefront of the integration challenges associated with high solar PV penetration levels.

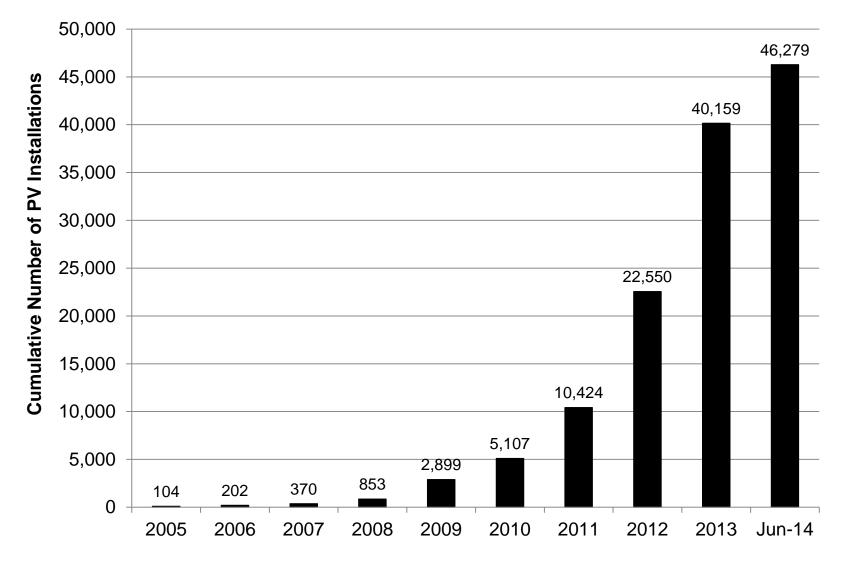
At the same time, Hawaii is on track by 2017 to become a world leader in the utilization of solar PV resources – both distributed and utility-scale – with installed solar PV capacity penetration levels exceeding 75% of typical daytime gross system loads likely on several island electric grids.

Hawaii's Distributed Solar PV Capacity Growth



Hawaii's Distributed Solar Customer Adoption

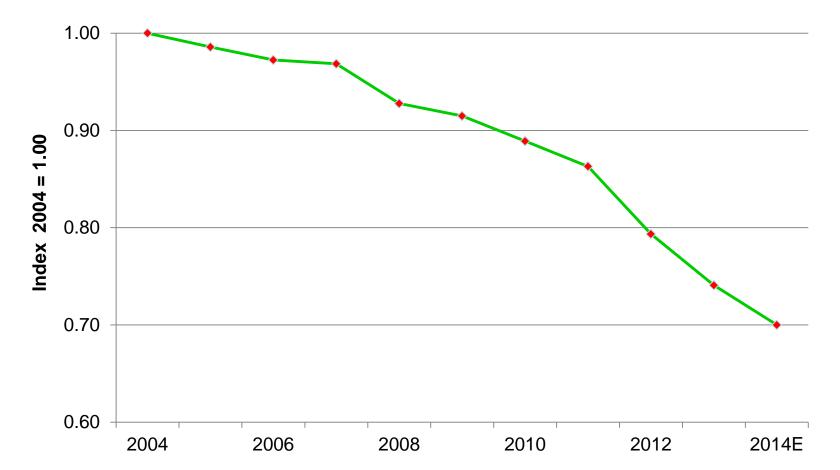
Hawaiian Electric Companies



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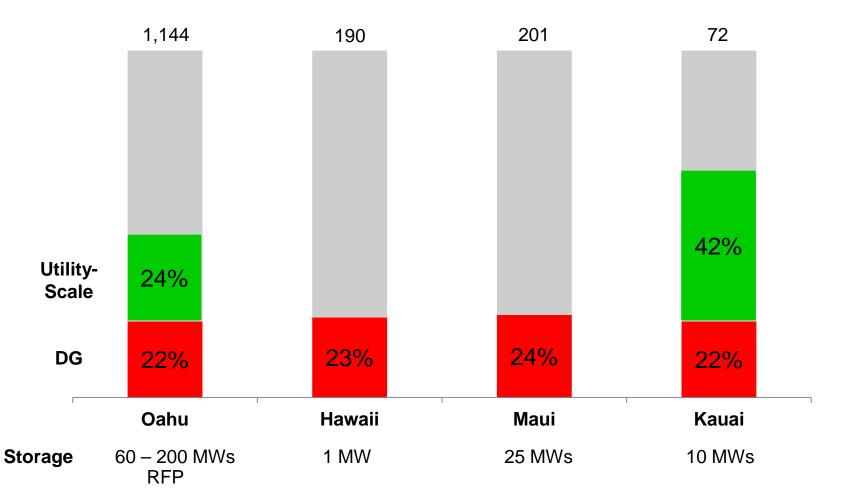
Hawaii – Decline in Average Residential Electricity Usage

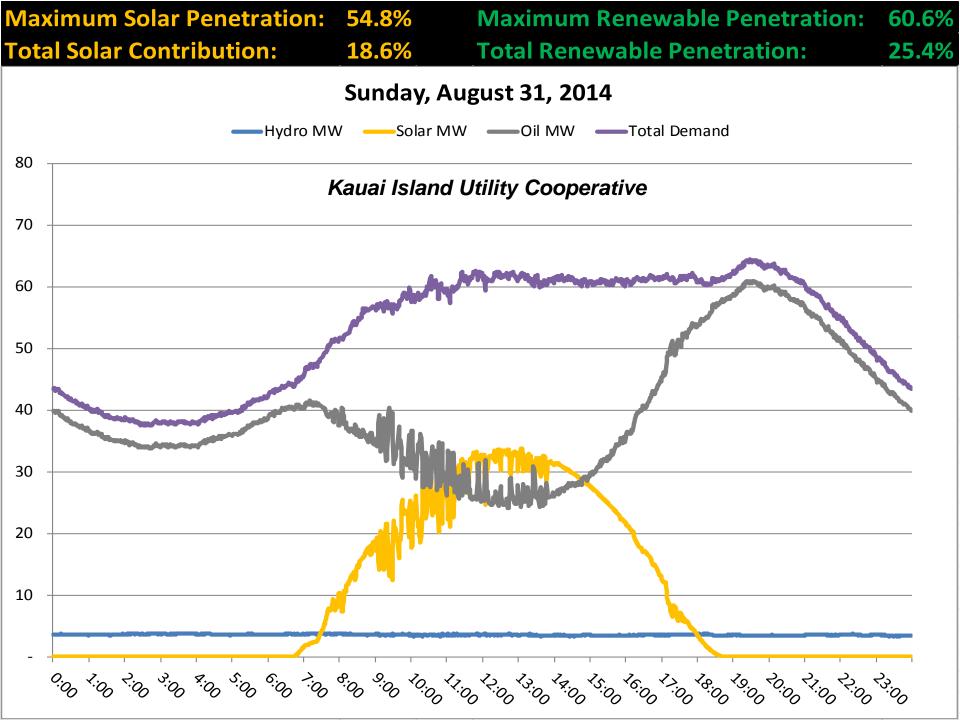




Hawaii's Distributed Solar PV Penetration

Distributed Solar PV Penetration Percentage of Annual System Peak Load





Circuit Penetration Level	No. of Circuits			Percentage of Circuits		
	Hawaiian Electric	Hawai`i Electric Light	Maui Electric	Hawaiian Electric	Hawaiʻi Electric Light	Maui Electric
> 120% Daytime Minimum Load ("DML")	101	21	8	24.3%	15.4%	5.8%
> 100% up to and including 120% DML	29	9	17	7.0%	6.6%	12.4%
> 75% up to and including 100% DML	59	26	21	14.2%	19.1%	15.3%
< 75% DML	227	80	91	54.6%	58.8%	66.4%
TOTAL	416	136	137	100.0%	100.0%	100.0%

Hawaii Distributed Solar PV -- Lessons Learned

- Exponential growth in customer solar PV installations occurred without fully understanding consequences
 - High rates, state tax policy, solar leasing and declining solar costs drove growth
 - NEM program size caps removed to accommodate customer demand and solar industry growth; no future check points
 - Outpaced ability of utility to effectively manage customer PV interconnection queue and integration issues slow to anticipate and recognize consequences
- Creating "boom-bust" cycle for distributed solar PV in Hawaii
 - Interconnection approvals have slowed significantly due to utility safety, reliability and operational concerns
 - Technical basis for concerns, and proposed mitigations, not well understood
 - General perception that electric utilities protecting their generation monopoly
 - Cost shift to non-participants only becoming material due to high proportion of avoided energy cost in total cost-of-service (⅔ of electric bill vs ≈ ⅓ on mainland)
- Substantial utility-scale solar PV development slated for completion by 2016 harmonize distributed and utility-scale renewable generation deployment

Hawaii Distributed Solar PV – Technical Lessons Learned

- Safety, reliability or operational issues not evident at lower penetration levels due to mostly residential systems and "integration" margin inherent in Hawaii's electric grids
- Size of customer's PV grid "footprint" matters -- unscheduled and uncontrolled export of excess solar energy onto grid regardless whether grid can physically or economically utilize energy is major challenge
- Bulk power system reliability challenges, not individual distribution circuit penetration levels, ultimately binding constraint on electrical island grids, and have emerged – finite amount of system technical and economic "capacity" to accommodate
- PV inverters are crucial part of distributed solar PV integration equation with high solar PV penetration; advanced inverters required but path forward uncertain
- Inability to curtail customer solar PV output requires curtailment of utility-scale renewable projects due to excess variable energy; customer PV effectively higher priority grid access
- Potential significant grid integration costs as utility-scale and distributed solar PV penetrations increase; moreover, less renewable energy output to spread mitigation fixed costs due to PV inherent low capacity factor

Hawaii Distributed Solar PV – Policy Lessons Learned

- Future deployment options under high penetration solar PV scenarios not well defined – emerging generic options:
 - Customer self-supply ("retail customer choice") non-energy export option driven by market in response to utility TOU rate and DR options
 - Customer grid-supply (wholesale energy) grid energy export option driven by utility energy procurements consistent with least-cost, balanced portfolio of renewable energy resources
- Current distributed solar PV business model (NEM) not sustainable, nor consistent with either emerging generic customer PV development option
 - Customer self-supply NEM predicated upon customer "self-supply" financially but relying heavily upon grid physically creating circuit and system challenges (≈ 20% PV capacity factor cannot supply ≈ 75% load factor residential energy usage without significant grid PV footprint)
 - Customer grid supply -- NEM procures "wholesale" energy supply at retail pricing as compared to utility-scale solar PV PPA pricing or where wholesale energy value may be negative due to surplus solar PV energy (*need additional system load, not additional solar PV energy*)

Hawaii Distributed Solar PV – Policy Lessons Learned (continued)

- Distributed solar PV industry will, out of necessity, have to migrate to a new business model⁽¹⁾ ("DER 2.0")
 - Customer self-supply define pricing terms and conditions and regulatory compact for solar PV full or partial "retail customer choice" option that minimizes customer grid footprint (non-export) unless dispatched by grid
 - Customer grid-supply define service offerings and pricing constructs for distributed solar PV "virtual power plant" option to supply cost-competitive wholesale energy, ancillary services and DR as required by grid

Utility service offerings and pricing options are critical component of DER 2.0

- Define technical and operating requirements that enable distributed solar PV to provide maximum grid value under either customer self or grid-supply options
- Establish transparent grid avoided cost-based price signals that enable DER developers to create product offerings to encourage customer participation
- Avoids potential adverse economic impacts on non-participant customers
- Legacy customer and technology issues growing challenge until DER 2.0

⁽¹⁾ See Hawaii Public Utilities Commission Decision and Order No. 32053 in Docket No. 2011-0206, dated April 28, 2014, at 49 - 50. On August 21, 2014, Commission commenced proceeding (Docket No. 2014-0192) to investigate distributed energy resource technical, economic and policy issues.

DER 2.0 – Distributed Solar PV Industry: Selective Perspectives

- TOU rates to incentivize DER customers to align load and generation through non-exporting systems and systems that only export during onpeak system load period
- Develop tariffs for fleets of DER that can be dispatched day-ahead and/or real-time providing ramping, frequency support, voltage support and other ancillary services
- Allow DER customers to participate in demand response programs and tariffs
- Expedited interconnection for DER with advanced inverters, energy management systems, non-export systems and energy storage technology that provide grid support services

Excerpts from White Paper attached to The Alliance for Solar Choice (TASC) motion to intervene, dated September 10, 2014, in Hawaii Public Utilities Commission Docket No. 2014-0192, proceeding to investigate distributed energy resource technical, economic and policy issues.

Electric Utilities – embrace customer DER technologies as potential solutions to renewable integration challenges and grid modernization; not problems that must be accommodated. *Maximizing solar DG grid value minimizes potential grid defection.*

Solar Industry – migrate to new business model that reflects value DER provides to grid (DER 2.0), not predicated upon avoiding grid financially (NEM)

Customers – recognize rapid pace of customer solar PV interconnections not sustainable when grid infrastructure mitigations need to be deployed and advanced inverter functionality not yet available

Public Policy – pursue balanced, least-cost portfolio of renewable energy resources recognizing grid integration costs