

HAWAII STATE ENERGY OFFICE STATE OF HAWAII

235 South Beretania Street, 5th Floor, Honolulu, Hawaii 96813 Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804 Telephone: Fax: Web: (808) 587-3807 (808) 586-2536 energy.hawaii.gov

Testimony of SCOTT J. GLENN, Chief Energy Officer

before the HOUSE COMMITTEE ON FINANCE

Thursday, February 25, 2021 11:00 AM State Capitol, Conference Room 308

Comments in consideration of HB 111, HD2 RELATING TO RENEWABLE ENERGY.

Chair Luke, Vice Chair Cullen, and Members of the Committee, the Hawaii State Energy Office (HSEO) provides comments on HB 111, HD2, which eliminates the use of fossil fuels for electricity generation, except emergency generators, after 2045.

Discussions of how, and when, the complete replacement of fossil fuels in the electricity (and other) sectors can take place is occurring in many venues, including in the Integrated Grid Planning docket before the Public Utilities Commission. The results of these efforts will be beneficial to establishing retirement dates for various power plants. The potential re-purposing of existing equipment such as engine generators to other uses, such as synchronous condensers to provide inertia on the system, may be considered, as the benefits, roles, and changing forms of energy generation and storage are developed. It is clear that it is important to plan for flexibility and resilience in our electrical systems during the transition, which will be accelerated with the retirement of the coal plant on Oahu in 2022, the Kahului Power Plant in 2024, and other units as new renewable generators come on-line. HSEO's comments are guided by its mission to promote energy efficiency, renewable energy, and clean transportation to help achieve a resilient, clean energy, decarbonized economy.

Thank you for the opportunity to testify.

DAVID Y. IGE GOVERNOR

SCOTT J. GLENN

CHIEF ENERGY OFFICER

TESTIMONY OF JAMES P. GRIFFIN, Ph.D. CHAIR, PUBLIC UTILITIES COMMISSION STATE OF HAWAII

TO THE HOUSE COMMITTEE ON FINANCE

February 25, 2021 11:00 a.m.

Chair Luke and Members of the Committee:

MEASURE:H.B. No. 111 HD2TITLE:RELATING TO RENEWABLE ENERGY.

DESCRIPTION: Prohibits the use of fossil fuels for electricity generation or storage after 12/31/2045. Prohibits the Public Utilities Commission from approving cost recovery of any application or proposal for generation or storage facilities that use fossil fuels, with certain exceptions. Exempts emergency generators. Effective 7/1/2050. (HD2)

POSITION:

The Public Utilities Commission ("Commission") offers the following comments for consideration.

COMMENTS:

The Commission is supportive of this measure's intent to ensure that the state's electricity system is powered by renewable energy, as is consistent with the state's clean energy goals.

The Hawaiian Electric Companies' ("Companies") most recent power supply improvement plan (PSIP) update projects that the 100% renewable portfolio standard (RPS) will be reached in 2040. The Commission is currently overseeing the creation and implementation of an Integrated Grid Planning (IGP) Report, which proposes to merge three historically separate planning processes (generation, transmission, and distribution), while integrating competitive procurement into a comprehensive grid planning approach. The IGP Report succeeds the PSIP, which was designed to identity and meet each island's unique grid needs. Through its IGP efforts, the Commission and H.B. No. 111 HD2 Page 2

the electric utilities will attain a more holistic understanding of each island's grid and the steps required to meet existing and future needs.

Thank you for the opportunity to testify on this measure.



DAVID Y. IGE

JOSH GREEN LT. GOVERNOR

STATE OF HAWAII OFFICE OF THE DIRECTOR DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS

335 MERCHANT STREET, ROOM 310 P.O. BOX 541 HONOLULU, HAWAII 96809 Phone Number: 586-2850 Fax Number: 586-2856 cca.hawaii.gov CATHERINE P. AWAKUNI COLÓN DIRECTOR

JO ANN M. UCHIDA TAKEUCHI DEPUTY DIRECTOR

Testimony of the Department of Commerce and Consumer Affairs

Before the House Committee on Finance Thursday, February 25, 2021 11:00 a.m. Via Videoconference

On the following measure: H.B. 111, H.D. 2, RELATING TO RENEWABLE ENERGY

Chair Luke and Members of the Committee:

My name is Dean Nishina, and I am the Executive Director of the Department of Commerce and Consumer Affairs' (Department) Division of Consumer Advocacy. The Department offers comments on this bill.

The purposes of this bill are to: (1) prohibit the use of fossil fuels for electricity generation or grid-tied battery energy storage after December 31, 2045; (2) prohibit the Public Utilities Commission (Commission) from approving cost recovery of any application or proposal for generation or storage facilities that use fossil fuels, with certain exceptions; and (3) exempt emergency generators.

The Department appreciates how H.D. 2 exempts emergency generators from the ban on using fossil fuels to generate or store electricity, as this exemption will provide flexibility to address reliability and resilience issues. However, the Department remains concerned about the unintended consequences that may result from subsection (b) on page 3, lines 18 through 21 of the bill. Testimony of DCCA H.B. 111, H.D. 2 Page 2 of 2

Subsection (b) creates a cost recovery exception under Hawaii Revised Statutes (HRS) section 269-6(d)(3), where the Commission can approve the utility cost recovery of a generating or storage unit that uses fossil fuels, at any time, as long as the utility also requests the establishment of a stranded cost recovery mechanism that encourages the accelerated retirement of the fossil fuel generation plant. The Department is concerned this exemption will allow the Commission to consider fossil fueled solutions in 2040, for example, as long as accelerated cost recovery occurs within five years to allow for early retirement. Renewable portfolio standards, once corrected to eliminate the sales-versus-generation loophole, will set clear guidelines for the Commission to ensure the elimination of fossil fuel reliance by 2045. However, if subsection (b) will remain, the Department recommends amending subsection (b) to be consistent with subsection (a) and read: "The public utilities commission shall not approve any application or proposal for public utility cost recovery for any generation or storage facilities that use fossil fuels[, except as provided under section 269-6(d)(3).] <u>after December 31, 2045.</u>"

The Department appreciates section 3's amendments to HRS section 269-6, as they clarify that the Commission does not need to conduct greenhouse gas emissions analyses when a utility seeks approval for such matters as financing authority, as well as when other utilities, such as a water or wastewater company, file an application with the Commission. Section 3 also provides further clarity related to future energy storage projects beyond the scope of battery storage systems.

Thank you for the opportunity to testify on this bill.

HB-111-HD-2 Submitted on: 2/23/2021 10:33:59 PM Testimony for FIN on 2/25/2021 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Natalie Parra	Keiko Conservation	Support	No

Comments:

We fully support this measure.

Thank you for the opportunity to submit testimony!

HB-111-HD-2

Submitted on: 2/24/2021 8:26:36 AM Testimony for FIN on 2/25/2021 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Ted Bohlen	Climate Protectors Hawaii	Support	No

Comments:

To: The Honorable Sylvia Luke, Chair,

The Honorable Ty Cullen, Vice Chair, and Members of the

House Committee on Finance

From: Climate Protectors Hawaii (by Ted Bohlen)

Re: Hearing HB111 HD2- RELATING TO RENEWABLE ENERGY

Thursday February 25, 2021, 11:00 a.m., by videoconference

Position: STRONG SUPPORT of HB111 HD2, WITH AN AMENDMENT!

Aloha Chair Luke, Vice Chair Cullen, and Finance Committee members:

The Climate Protectors Coalition is a group focused on reversing the climate crisis. As a tropical island State, Hawaii will be among the first places harmed by the global climate crisis, with more intense storms, loss of protective coral reefs, food insecurity, and rising sea levels destroying our shorelines. We must do all we can to reduce our carbon footprint and become carbon negative as soon as possible. The planet faces an existential climate crisis and we must act now! The IPCC (Intergovernmental Panel on Climate Change) says we have less than 10 years for worldwide climate action to avoid climate catastrophe. If we are to solve the climate crisis, it will require **all of us** working together. Hawaii can and should be a leader in showing the world the way forward towards a safe and sustainable climate and future. The sooner we inspire others to take action and lead by example, the better off the future will be for our children.

Electric generation using fossil fuels is one of Hawaii's largest sources of carbon emissions. In order to meet its goal of becoming carbon negative before 2045, the State needs to stop using fossil fuels to generate electricity. But, **2045 will be too late!** In order to keep the world's temperature increase below 1.5 degrees Celsius, we need to take dramatic action in the next ten years, not the next 25 years!

Fossil fuel use needs to be phased out and replaced by cleaner alternatives by 2030. We ask the Committee to amend HB111 HD2 to change the 2045 date to 2030, consistent with what the scientific consensus says is necessary to avoid a climate calamity, especially for an island state.

Please pass this bill with the date amended to 2030!

Mahalo!

Climate Protectors Hawaii (by Ted Bohlen)



Environmental Caucus of The Democratic Party of Hawaiʻi

Thursday, February 25, 2021, 11:00 am

House Committee on Finance

HOUSE BILL 111 – RELATING TO RELATING TO RENEWABLE ENERGY: Phasing out use of fossil fuels to generate electrical power

Position: Support

Me ke Aloha, Chair Sylvia Luke, Vice-Chair Ty Cullen, and Members of the Committee on Finance:

The Environmental Caucus appreciates the work on improving this bill by exempting emergency power sources, and accepts this modification as Hawaii transitions to a more robust and resilient all-renewable sourcing for our electrical power.

The Caucus reiterates its support of this important step, and notes our intention of continuing to work towards mapping out its assiduous implementation.

/s/ Charley Ice, Co-Chair, Energy & Climate Action Committee, Environmental Caucus of the Democratic Party of Hawaii.

FAITH ACTION FOR COMMUNITY EQUITY ENVIRONMENTAL JUSTICE TASK FORCE

House Finance Committee February 25, 2021 at 11:00 am Via Videoconference and Conference Room 308

SUPPORTING HB 111 HD 2

The Environmental Justice Task Force of Faith Action for Community Equity supports HB 111 HD 2, which will reduce our dependence on imported fossil fuels for generating electricity.

Climate change is accelerating, and in the several years before the Covid-19 pandemic, Hawaii's consumption of fossil fuels had not declined. Hawaii must do much more to do its part to control climate change.

This bill will reduce the consumption of fossil fuels and is consistent with the State's 2045 net zero emissions goal. This bill should be one of multiple bills passed by the Legislature to enable Hawaii to do its part to control climate change.

Please also consider amending to set a target date to reduce or end electricity generation via biomass combustion as this also contributes to the degradation of our environment.

Thank you for hearing and supporting HB 111 HD 2. The Environmental Justice Task Force of Faith Action for Community Equity supports HB 111 HD 2.



TESTIMONY BEFORE THE HOUSE COMMITTEE ON FINANCE

H.B. 111 H.D. 2

Relating to Renewable Energy

Thursday, February 25, 2021 11:00 am, Agenda Item #20 State Capitol, Conference Room 308

Marc Asano Director, Transmission and Distribution Planning Hawaiian Electric

Chair Luke, Vice Chair Cullen, and Members of the Committee:

My name is Marc Asano and I am testifying on behalf of Hawaiian Electric

Company in opposition to H.B. 111 H.D. 2, Relating to Renewable Energy.

H.B. 111, H.D. 2 proposes to ban the use of fossil fuels for electric generation

production after December 31, 2045 and does not allow the Public Utilities Commission to approve cost recovery of any proposal for generation or storage facilities that use fossil fuels.

Hawaiian Electric supports breaking the State's dependence on fossil fuels; however, it should be done in a cost-effective, reliable, and resilient manner. The State's 100% Renewable portfolio standards (100% RPS Mandate) pursuant to H.R.S. §269-92 already requires the Company to virtually eliminate fossil fuel usage by 2045. While we oppose this bill, if your Committee is considering its passage, please ensure proper alignment between H.B. 111 H.D. 2 and the State's 100% RPS Mandate. H.B. 111 H.D. 2 should include events or circumstances that are outside the electric utility's control as described in §269-92(d), to ensure the resilience of the electric system such that the utility is able to supply power during emergency situations, and where fossil fuel generation may be the only type of generation that the utility has access to during these events. Further the Company should be able to supply the community with fossil fuel power if that is the last option available, particularly in an emergency situation when access to renewable energy resources is limited or unavailable. The Company may also be unable to acquire renewable energy because of community, land use or other policy circumstances that may inhibit its development. To that end, the Company requests the following amendments:

• To meet the intent of this bill, Section 2, part (a) should clarify that electricity

generation facilities includes "merchant or co-generation facilities, owned or

operated by the electric utility, independent power producers, government and

non-government agencies, and any persons or entities, shall cease the use of all

fossil fuels for the generation or storage of electricity..."

• In order to ensure consistency with HRS Section 269-92 (d) in addition to exempting emergency generators insert the following:

2) For events or circumstances that are outside of an electric utility company's reasonable control, and may include, to the extent the event or circumstance could not be reasonably foreseen and ameliorated:

- a) Weather-related damage;
- b) Natural disasters;
- c) Mechanical or resource failure;
- d) Failure of renewable electrical energy producers to meet contractual obligations to the electric utility company;
- e) Labor strikes or lockouts;
- f) Actions of governmental authorities that adversely affect the generation, transmission, or distribution of renewable electrical energy under contract to an electric utility company;
- g) Inability to acquire sufficient renewable electrical energy to meet the renewable portfolio standard goals beyond 2030 in a manner that is beneficial to Hawaii's economy in relation to comparable fossil fuel resources;
- h) Substantial limitations, restrictions, or prohibitions on utility renewable electrical energy projects; and
- i) Other events and circumstances of a similar nature.

Additionally, it is unclear whether part (b) of this bill related to Public Utilities Commission approval of generation that uses fossil fuel would be effective December 31, 2045. The Company recommends that December 31, 2045 also apply to part (b) of this bill.

Accordingly, the Hawaiian Electric opposes H.B. 111 H.D. 2., while offering proposed amendments for your consideration. Thank you for this opportunity to testify.



Testimony to the Committee on Finance Thursday, February 25, 2021 11:00 AM VIA Video Conference Conference Room 308, Hawaii State Capitol HB 111

Chair Luke, Vice Chair Cullen, and members of the committee,

Hawaii Clean Power Alliance (HCPA) <u>supports</u> HB 111 HD2, which eliminates fossil fuels in Hawaii for electricity generation and storage.

The Hawaii Clean Power Alliance is a nonprofit alliance organized to advance and sustain the development of clean energy in Hawaii. Our goal is to support the state's policy goal of 100 percent renewable energy by 2045. We advocate for utility-scale renewable energy, which is critical to meeting the state's clean energy and carbon reduction goals.

We offer these comments in support of HB 111 HD1:

This bill reinforces the intent of the state's 2045 policy – eliminating fossil fuel powered electricity generation and storage, which will help steadily increase renewable generation, while providing the electric utility with enough time to transition to 24X7 firm renewable generation while not negatively impact its current achievement of RPS.

With the 2045 goal of 100% RPS just over two decades away, we should avoid allowing further investment into fossil generation because it is no longer aligned with the need to steadily accelerate our renewable energy future. We cannot wait until just prior to 2045 to retire fossil generation all at once, as doing so would unnecessarily prolong and encourage the continued use of legacy fossil generation. Rather, legacy fossil generation should gradually be retired in lock step with new additions of sufficient renewable generation such that ratepayers do not have to pay for both assets. Liken this to keeping your old worn out car and maintaining it after you have purchased your new replacement car. Reliability of the grid does not have to be compromised, because this bill will provide enough time for the utility to plan to keep grid reliability and costs in check.

Previous committees deleted a key amendment that would require the public utilities commission to not approve or extend new generators that could only be powered by fossil fuels. It would also disallow any material improvements for fossil fuel powered existing generators to be overhauled. This would align the utilities with the consumer by not burdening the ratepayer to pay for assets beyond 2045 that would be obsolete because of the 2045 mandate. This would also incent the utilities to responsibly convert these facilities to dual-powered renewable fuels, while allowing them to continue their fossil fuels until 2045.

Therefore, we respectfully request the committee consider re-inserting the following amendment with the date of 2025.

"<u>§269-</u> Elimination of fossil fuels for electricity production. (a) Beginning after 2025, the public utilities commission shall not approve or extend:

- (1) Any electricity generation facility that applies or proposes to use fossil fuels to generate electricity or to store electricity into a public utility grid-tied battery energy storage system resource; or
- (2) (2) Any material improvements, overhauling, or refurbishing of any existing electricity generation facilities that extend the life of fossil fuel-powered electricity generation facilities or storage facilities that use fossil fuel-powered electricity.



In addition, utility-scale storage was not yet commonly available in the market during the passage of previous renewable energy focused statutes. With improvements in technology and lower pricing making utility-scale storage a viable option for the state, our laws need to address potential misalignment in achieving the state's 2045 renewable energy goals. Just as the federal income tax credit (ITC) is not allowed for stand-alone storage filled with fossil fuel energy, we must prohibit the use of fossil fuels to fill stand-alone storage, even if such storage was procured through a renewable energy competitive bid. Prohibiting the use of fossil fuels to fill stand-alone storage will encourage the reduction of fossil fuels and carbon emissions in alignment with state goals.

Allowing storage to be powered by fossil fuels, negating many benefits that would be available through renewable storage, is a step backwards and promotes more fossil fuel use at an even higher cost than the coal plant that is scheduled to be retired in September 2022. HCPA believes strongly that today's grid and storage investments should move us collectively towards the interim RPS targets and 2045 goal. The original statute's intent was to gradually eliminate fossil fuels plain and simple. It never contemplated that storage would be filled with fossil fuels. With this bill, the state will close the loophole that potentially allows filling energy storage with fossil fuel electricity pretending this is renewable energy. Filling a grid-connected storage system with fossil fuel electricity only adds inefficiency (power losses) and increases costs to ratepayers, as well as increases carbon emissions. This cuts against the state's goal of reducing fossil fuel generation and should not be allowed.

We ask the committee to pass this bill and consider the amendments proposed.

Thank you for the opportunity to testify.

Sincerely,

Frederick Redell, PE

Executive Director (949) 701-8249 www.hawaiicleanpoweralliance.org



To: The House Committee on Finance From: Sherry Pollack, 350Hawaii.org

Date: Thursday, February 25, 2021, 11am

Comments for HB111 HD2

Aloha Chair Luke, Vice Chair Cullen, and members of the Finance committee,

I am Co-Founder of the Hawaii chapter of 350.org, the largest international organization dedicated to fighting climate change. On behalf of our 6,000 members and supporters, 350Hawaii.org offers the following comments on this bill.

We are in strong support of HB111 that proposed a deadline for the use of fossil fuels by electric utilities. However, we have serious concerns and are in **strong opposition** to the date which was inserted for prohibition, December 31, 2045 in the current version of this measure.

The planet faces an existential climate crisis and we must act now. As an island state, Hawaii is ground zero for climate devastation, from more intense storms, to food insecurity, to rising seas and shoreline destruction. Scientists have made clear that we are part of the last generation that can stop or at least mitigate the devastating impacts of climate change. If we are to solve the climate crisis, it will require all of us working together. Hawaii can and should be a leader in showing the world the way forward towards a safe and sustainable climate and future. The sooner we inspire others to take action and lead by example, the better off the future will be for our children.

Emissions from fossil fuel power plants are a leading cause of global warming. This bill *could take* a major step in reducing these harmful emissions, but a target date of 2045 is woefully too late.

The Climate Crisis is here now. Scientists have made clear that we must swiftly phase out fossil fuel use or face untold suffering. We no longer have the luxury to wait to take the necessary actions to drastically reduce our greenhouse gas emissions. Fossil fuel use needs to be phased out and replaced by nonclimate-harming alternatives by 2030.

We ask the Committee to amend HB111 HD2 to change the 2045 date to 2030, consistent with what the scientific consensus says is necessary to avoid climate chaos. We recommend that the bill be amended to better keep within our carbon budget and align with the UN IPCC goals of carbon emissions reductions so that Hawaii will do its share to limit the increase of global temperatures from rising greater than 1.5 degrees Celsius. To better achieve this, we recommend this measure require the Energy Office convene a working group to develop a plan with metrics and benchmarks with annual

evaluations on the progress of achieving these goals, with the plan submitted to the legislature in 2022.

Please pass this bill amended to 2030!

Mahalo for the opportunity to testify.

Sherry Pollack Co-Founder, 350Hawaii.org COMMITTEE ON FINANCE Rep. Sylvia Luke, Chair Rep. Ty J.K. Cullen, Vice Chair

HEARING DATE: Thursday, February 25, 2021 TIME: 11:00 am PLACE: VIA VIDEO CONFERENCE Conference Room 308 State Capitol 415 South Beretania Street

HB111

COMMENTS

Aloha Chair Luke, Vice Chair Cullen, and Members of the Committee:

This testimony is being submitted on behalf of the membership of the International Brotherhood of Electrical Workers Local 1260. IBEW Local 1260 represents more than 3000 members throughout the Pacific, across the Hawaiian Islands, Guam and Wake Island. One of our largest jurisdictions includes utility workers from Hawaiian Electric, Maui Electric, Hawaii Electric Light and Kauai Island Utility Cooperative, as well as several signatories that contract with these utilities to maintain our independent grids across the islands.

Our organization wants to be clear; we are 100% behind a green renewable energy platform. We not only want to be part of this transformation, but we want to take a leading role in making this conversion take place. IBEW Local 1260 consists of highly trained and skilled members who are eager to take on the challenges of our electric grids and their impact to climate change. Our members want to be on the front lines moving forward with the creation, installation, and maintenance of new smart grids able to handle the challenges based solely on renewables. It is our belief that a 100% renewable energy platform requires a comprehensive plan, utilizing current technologies, those in development, and ones that are presently conceptual.

We would like to offer the following as a proposed amendment to Section 2 for your consideration:

(b) Utilization priority will be given to baseload firm renewable generation or storage facilities. To phase out the use of fossil fuels, the Public Utility Commission can only approve applications or proposals for public cost recovery for generation or storage facilities that use fossil fuels required to maintain grid stability.

We believe this sets our target of transitioning to 100% renewables as the true goal and allows the sunsetting of fossil fuels generation at the pace that the infrastructure can handle.

We sincerely thank the Committee on Finance for their time, consideration, and dedication to the future of the Hawaiian Islands and our role in climate change.

Leroy Chincio Business Manager and Financial Secretary International Brotherhood of Electrical Workers Local 1260 700 Bishop Street #1600 Honolulu, HI 96813

HB-111-HD-2 Submitted on: 2/23/2021 10:34:17 PM Testimony for FIN on 2/25/2021 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Andrea Quinn	Individual	Support	No

Comments:

Dear Honorable Committee Members,

Please support HB111.

Thank you,

Andrea Quinn

HB-111-HD-2 Submitted on: 2/24/2021 3:21:59 AM Testimony for FIN on 2/25/2021 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Thomas Brandt	Individual	Support	No

Comments:

Support

HB-111-HD-2

Submitted on: 2/24/2021 10:12:09 AM Testimony for FIN on 2/25/2021 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Janet Pappas	Individual	Support	No

Comments:

Dear Chair Luke, Vice Chair Cullen, and Finance Committee members,

Our planet and humanity's existence are now in grave danger due to ongoing climate change. Scientists tell us we must take immediate steps to stop global warming. Hawaii is a huge consumer of fossil fuels, to the tune of \$5 billion of imported fuel yearly. Transitioning away from these carbon-based fuels NOW is critical if we are to reverse the warming.

Bill HB111 HD2 moves us in the right direction by disallowing fossil fuel use for electricity generation and storage after a given date. For best results for ratepayers, and because scientists warn us that time is of the essence, I suggest 50% conversion by 2025 and 100% by Jan. 1, 2030. A plan needs to be in place by 2022 with milestones showing progress toward our goal.

Hawaii has many incentives to convert as soon as it is feasible. Using renewable energy will:

1) reduce our dependence on imported and price-volatile fossil fuels (now costing us nearly 5 billion/yr) which will help strengthen and stabilize Hawaii's economy

2) bring clean energy jobs to Hawaii lifting people out of poverty, and

3) reduce carbon emissions that will help protect Hawaii and the world from a climate and environmental catastrophe

As with the pandemic, the critical partners need to work together--in this case, the government agencies and energy utilities--and act quickly and steadily to ensure a livable planet for future generations.

Please pass HB111 this session with the earliest possible transition dates eliminating fossil fuel use for both electricity generation and battery energy storage.

Thank you for the opportunity to testify.

Sincerely,

Jan Pappas

Aiea, Hawaii