

OFFICE OF INFORMATION PRACTICES

STATE OF HAWAII
NO. 1 CAPITOL DISTRICT BUILDING
250 SOUTH HOTEL STREET, SUITE 107
HONOLULU, HAWAII 96813
TELEPHONE: 808-586-1400 FAX: 808-586-1412
EMAIL: oip@hawaii.gov

To: Senate Committee on Ways and Means

From: Carlotta Amerino, Director

Date: February 25, 2026, 10:57 a.m.
State Capitol, Conference Room 211

Re: Testimony on S.B. No. 2497, S.D. 1
Relating to Electric Energy

Thank you for the opportunity to submit testimony on this bill, which would require electric utilities to provide customer bill impact analyses to the Public Utilities Commission (PUC), and require the PUC to make them publicly available in electronic form. The Office of Information Practices (OIP) recommended an amendment to a confidentiality provision in this bill as introduced, and that amendment was made in the S.D. 1 version of the bill. OIP has no further concerns regarding this bill.



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I
OFFICE OF THE DIRECTOR
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
KA 'OIHANA PILI KĀLEPA
335 MERCHANT STREET, ROOM 310
P.O. BOX 541
HONOLULU, HAWAII 96809
Phone Number: 1-844-808-DCCA (3222)
Fax Number: (808) 586-2856
cca.hawaii.gov

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

NADINE Y. ANDO
DIRECTOR | KA LUNA HO'OKELE

DEAN I. HAZAMA
DEPUTY DIRECTOR | KA HOPE LUNA HO'OKELE

Testimony of the Department of Commerce and Consumer Affairs

**Before the
Senate Committee on Ways and Means
Wednesday, February 25, 2026
10:57 a.m.
Via Videoconference**

**On the following measure:
S.B. 2497, S.D. 1, RELATING TO ELECTRIC ENERGY**

WRITTEN TESTIMONY ONLY

Chair Dela Cruz and Members of the Committee:

My name is Michael Angelo, 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 purpose of this bill is to: (1) require all electric utilities to provide transparent customer bill impact analyses that are accessible to the public in an electronic format reasonably usable by ratepayers; (2) establish requirements for bill impact analyses; and (3) require electric utilities to submit annual reports to the Public Utilities Commission (Commission).

The Department understands and appreciates the intent of this bill to increase public transparency regarding the estimated financial impact of electricity generation and/or storage projects on residential utility customer's bills. However, the Department offers that, as the bill is structured, the usefulness of such detailed information to

customers is not apparent and may be confusing. It is not clear how such level of detailed information would be used in a meaningful way by most customers. The Department offers that the proposed sections of Hawaii Revised Statutes § 269-47(c) through § 269-47(e) could be substantially simplified to focus on understanding the estimated annual bill impact of the project on a typical residential customer. The legislation could be changed in those sections to require that when the utility submits an application to the Commission for approval of utility owned generation and/or storage or a power purchase agreement with an independent power producer for generation and/or storage, the utility be required to file the unredacted annual estimated bill impact of the individual project for a typical residential customer together with a general qualitative explanation of the methodology used and key assumptions.

The Department would like to better understand whether the electric utility has specific concerns regarding disclosure of calculations related to the estimated annual bill impact and whether providing the annual estimated bill impact amount would adversely affect the competitiveness of the bidding process for procuring new generation.

Thank you for the opportunity to testify on this bill.

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR



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

JON S. ITOMURA
CHAIR

NAOMI U. KUWAYE
COMMISSIONER

COLIN A. YOST
COMMISSIONER

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

Website: puc.hawaii.gov
E-mail: puc@hawaii.gov

Testimony of the Public Utilities Commission

To the
Senate Committee on
Ways and Means

February 25, 2026
10:57 a.m.

Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee:

Measure: S.B. No. 2497, S.D.1
Title: RELATING TO ELECTRIC ENERGY.

Position:

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

Comments:

The Commission supports the intent of this measure to provide increased transparency to ratepayers and to allow for comprehensive bill impact analysis of project impacts on electric rates.

With respect to proposed electric generation and storage projects from the utilities, the Commission notes that there are certain elements of a typical bill impact analysis, prior to Commission decision, that may need to be redacted for public review. This includes, but is not limited to, contracts with Hawaiian Electric's and Kauai Island Utility Cooperative's ("KIUC") suppliers that file pricing information with the Commission under protective order; proposed pricing that Hawaiian Electric and KIUC provides in a self-build proposals that could disadvantage Hawaiian Electric and KIUC in future competitive bidding processes; and other proprietary or sensitive information. The Commission also notes that disclosure of contract terms could potentially disincentivize the submission of proposals in a market (i.e., Hawaii) that already struggles to receive an adequate number of electric generation and storage project bids.

Additional reservations related to the disclosure of such information include proposed project information would likely be voluminous and may not, in the end, be approved by the Commission and sensitive or proprietary information from other energy generation

and storage projects or contracts outside the proposed project considered by the Commission during decision-making. If this measure is passed into law, the Commission recommends narrowing the scope to information disclosed specific to Commission approved projects.

Finally, the Commission observes that the measure does not identify a threshold for which proposed energy or storage projects should be considered. Consistent with General Order 7, the Commission suggests that the threshold be set for projects requesting cost recovery at or above \$4.3 million. As for projects that fall below the \$4.3 million threshold, a simple “roll-up” could be provided, as seen below.

As such, the Commission requests that the Committee consider the following amendments:

Page 5, Line 3 to Line 9, additions in underline and bold:

(c) In addition to any requirements under this chapter, each electric utility that sells electricity for consumption in the State shall ~~submit a~~ **maintain an online bill impact analysis tool** for a ~~proposed electric power systems that are used and useful~~ generation or storage project to the commission, which shall provide full disclosure to ratepayers of all modeling **top level** assumptions used to calculate the **per project** projected impact on customer bills. **Provided an applicable threshold as determined by the commission by rule or order, each electric utility shall represent any power systems included in this tool that come in below the determined threshold in a set of categories in summation as determined by the electric utility.**

Page 5, Line 10 to Line 16 additions in underline and bold:

(d) The bill impact analysis disclosure required under subsection (c) shall be ~~submitted~~ **available for download** in an electronic format reasonably usable by ratepayers and others and, for purposes of reviewing and analyzing the underlying **top level** assumptions and calculations, shall be sufficient to allow sensitivity analysis and scenario testing. The bill impact analysis shall include, at a minimum, but shall not be limited to the following: **resource assumptions, project assumptions, and top level modeling.**

Page 5, Line 17 to Page 6, Line 20 request deletion from measure

Page 7, Line 1 to Line 9 additions in underline and bold:

(e) For the submitted bill impact analysis disclosure data required under this section:

(1) The data shall be made available through simple, electronic, consistent, machine-readable formats with temporal ~~and geographic~~ granularity in an electronic format reasonably usable by ratepayers and others and, for purposes of reviewing and analyzing the ~~underlying~~ **top level** assumptions and calculations, shall be sufficient to allow sensitivity analysis and scenario testing; and

Page 7, Line 19 to Page 8, Line 2 additions in underline and bold:

(f) The electric utility shall update the bill impact analysis required under this section if, ~~during the pendency of the proceeding,~~ any material assumption changes, including but not limited to ~~the delay, cancellation, or non-selection of a planned project~~ **project retirements and operational cost changes** included in the analysis.

With the recommended modifications to this measure, to remove projects that are not yet decided by the Commission, disclosure of project information on approved projects could be achieved on Hawaiian Electric's and KIUC's websites, with easy-to-use mouse-over diagrams that highlight the bill impact of each particular project with summaries of all approved projects on an annual basis. The Commission expects that Hawaiian Electric's and KIUC's annual filings may be made in an open docket for General Order 7 reporting.

Thank you for the opportunity to testify on this measure.



**Hawaiian
Electric**

**WRITTEN TESTIMONY BEFORE THE SENATE COMMITTEE ON
WAYS AND MEANS**

**SB 2497, SD1
Relating to Electric Energy**

Wednesday, February 25, 2026
10:57 AM

State Capitol, Conference Room 211 & Videoconference

Dear Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee,

Hawaiian Electric is testifying with comments to **express concerns** with SB 2497, SD1, Relating to Electric Energy.

While the bill is framed as a transparency initiative intended to improve affordability, its practical effect would be the opposite: higher costs, slower project development, reduced competition, and increased regulatory conflict.

First, the Public Utilities Commission (PUC) already has the tools to achieve the bill's stated purpose. The PUC has broad authority to obtain modeling inputs, require disclosures, and evaluate the reasonableness of assumptions. The Commission, the Consumer Advocate, and intervening parties with an interest in a particular PUC proceeding routinely examine the relevant data and information to that docket. The regulatory process allows such parties to ask questions of Hawaiian Electric on such data and information as needed. The bill's "transparency" requirements do not meaningfully benefit customers. Instead, they primarily benefit market participants who would gain access to detailed utility modeling and commercial assumptions. This is not a gap that requires legislation; it is a matter already well within the PUC's discretion to manage.

Second, the bill forces disclosure of commercially sensitive and market-moving information and undermines procurement defensibility. It requires public release of cost, pricing, and operational assumptions that are normally protected to preserve competitive procurement, including bid-level pricing structures, dispatch expectations, fuel and cost forecasts, and operational strategies. Public disclosure of this information will predictably raise bid prices, as bidders will assume their pricing strategies will be exposed to competitors, and may further reduce the already small pool of participants in Hawai'i's solicitations. At the same time, revealing bid-evaluation thresholds and modeling assumptions enables bidders to strategically tailor offers to exploit known criteria rather than submit their lowest-cost proposals, compromising the fairness of the procurement process. By mandating publication of modeling structures, assumptions, and sensitivity cases, the bill also provides bidders and intervenors with a roadmap to challenge or manipulate procurement outcomes, increasing opportunities for gaming, procedural disputes, and litigation that erode the defensibility of competitive solicitations and delay or derail projects - outcomes that directly undermine affordability.

Third, the bill conflicts with existing PUC confidentiality and discovery frameworks. The PUC already has a well-established system for handling confidential information through protective orders and confidential exhibits. This bill attempts to legislate outcomes that are normally handled through Commission judgment on a case-by-case basis. By narrowing confidentiality so severely—while simultaneously requiring disclosure of cost, pricing, and operational assumptions—the bill creates direct conflict with existing regulatory practice and undermines the Commission's ability to balance transparency with market integrity.

Fourth, the continuous update requirement will delay approvals and increase litigation. Energy dockets are complex and often span many months. Assumptions routinely change as projects are delayed or withdrawn, market conditions shift, and resource plans evolve. This bill requires utilities to update and republish bill impact analyses every time a “material assumption” changes. That creates a powerful incentive for project opponents or unsuccessful bidders to argue that any change—no matter how minor—requires a full re-run of the analysis. The result will be more procedural disputes, more motions, more delays, and higher regulatory costs. This is the opposite of what Hawai'i needs to accelerate clean energy deployment.

Moreover, the bill mandates annual publication of levelized cost of energy (LCOE) based on actual dispatch, which is technically misleading. LCOE is a lifecycle metric, not an annualized performance measure. For projects with storage—or even for standalone generation—actual dispatch varies due to system conditions, not project economics. Without careful normalization, this requirement risks producing misleading comparisons that confuse rather than inform the public.

In addition, the bill increases cyber and system security risks. The bill requires data with “temporal and geographic granularity” combined with operational assumptions. This level of detail can reveal system constraints, dispatch patterns, vulnerability points, and resource dependencies. Although the bill attempts to carve out cybersecurity exceptions, it simultaneously prohibits confidentiality for cost, pricing, and operational assumptions “necessary for understanding.” These two provisions are in direct tension, and the result is a real risk of exposing sensitive operational information.

Hawaiian Electric notes that the PUC has established a controlled and highly regulated framework under which the Company may submit bids into renewable energy

RFPs. This process is overseen by both the PUC and an Independent Observer, a PUC appointed neutral party responsible for monitoring the RFP process end-to-end and reporting to the Commission on whether it was fair, unbiased, and conducted in accordance with established rules.

Under PUC requirements, the Company's self-build team, which prepares and submits bids on behalf of Hawaiian Electric, must remain strictly separate from the RFP evaluation team reviewing all proposals. The Independent Observer closely monitors this separation, as well as the evaluation and selection process and key decisions, and flags any potential bias or rule violations. As a result of these safeguards, the self-build team does not have access to the types of information this bill would require to be made publicly available, such as resource assumptions or pricing-related bid selection criteria.

In sum, as drafted, this bill will raise costs, slow projects, reduce competition, and increase regulatory conflict - all of which undermine the State's affordability and clean energy goals. The PUC already has the authority and tools to manage transparency appropriately without the unintended consequences this bill would create.

Hawaiian Electric appreciates the opportunity to provide its **concerns** with SB 2497, SD1. Thank you for this opportunity to submit written testimony.



TESTIMONY TO THE COMMITTEE ON WAYS AND MEANS

10:57 AM, FEBRUARY 25, 2026

Conference Room 211 & Via Videoconference

SB 2497 SD1

Chair Dela Cruz, Vice Chair Moriwaki and Members of the Committee,

Hawaii Clean Power Alliance (HCPA) **supports SB 2497 SD1**, which requires all electric utilities to provide transparent customer bill impact analyses that are accessible to the public in an electronic format reasonably usable by ratepayers. Establishes requirements for bill impact analyses. Requires electric utilities to submit annual reports to the Public Utilities Commission.

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.

Applications for approvals of energy projects include the projected bill impact to ratepayers because every approved project ultimately feeds into customer bills through PUC authorized cost recovery. Providing this information in a transparent and standardized format allows consumers to understand how individual projects translate into real dollar impacts on their household bills. It also enables meaningful comparison between the stable and predictable costs of renewable energy compared to continued exposure to volatile fossil fuel prices. More information provided to the ratepayers can help the consumers understand the benefits of clean energy and the long-term impact on their bill.

Some have expressed concern that greater transparency could harm the competitive bidding process. However, when a Project Docket is filed, the PPA price is public. Other competitive bids submitted through the utility's RFP process cannot be indiscriminately changed once submitted. The procurement framework includes strict guardrails that limit post-selection price adjustments and require justification for any modification. Aggregated customer bill impact information does not reveal proprietary bid details or allow competitors to reprice their proposals. Transparency regarding customer bill impacts is distinct from disclosure of confidential bid strategies.

Attached are exhibits from an open docket before the Public Utilities Commission. The filing discloses the PPA price and includes assumptions regarding future renewable projects and the retirement of existing resources. However, it does not disclose the pricing assumptions

underlying those projections or the cost assumptions for existing generation currently on the grid.

In addition, portions of the analysis are redacted, including information that can be readily extrapolated from disclosed data, as well as key assumptions that may not reflect current regulatory, market, or policy realities.

Consumers are suffering from the highest electricity rates in the nation and if they don't have transparent data, they could incorrectly conclude that those high rates are the result of the state's policy to achieve 100% renewable energy by 2045. In reality, electricity bills reflect a combination of fuel costs, legacy generation costs, infrastructure investments, and new resource additions. Transparent bill impact analysis allows customers to see how each component contributes to their total bill.

This bill can help correct misinformation by requiring disclosure of methodology, assumptions, and annual comparisons of forecasted versus actual impacts on customer bills. This creates accountability, enables continuous improvement, and protects consumers from unsupported cost projections.

When ratepayers can clearly see how projects translate into monthly bill impacts, they are more likely to trust the regulatory process and support responsible clean energy development. This bill strengthens transparency, improves decision-making, and builds public confidence in Hawai'i's clean energy transition.

We respectfully ask the Committee to pass SB2497 SD1.

Thank you for the opportunity to testify.

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAI‘I**

In the Matter of the Application of

**HAWAIIAN ELECTRIC COMPANY,
INC.**

**For Approval of Power Purchase
Agreement for Renewable Dispatchable
Generation with Mahi Solar, LLC.**

DOCKET NO.

HAWAIIAN ELECTRIC COMPANY, INC.’S APPLICATION

EXHIBITS 1 – 14 and A

VERIFICATION

AND

CERTIFICATE OF SERVICE

**JACK W. RELF
ASSOCIATE GENERAL COUNSEL
Hawaiian Electric Company, Inc.
P.O. Box 2750
Honolulu, Hawai‘i 96840-0001**

the Facility will allow the Company to store solar energy generated by the Facility to be delivered during times of available demand. When grid charging, the Company will also be able to store energy from other resources on the grid, including distributed energy resources, to allow for greater certainty of supply for periods of lower solar production. Additionally, the facilities provide many additional services including, but not limited to regulating reserve, primary frequency response, and voltage regulation, and all of the Stage 3 RFP projects are required to provide “black-start” capabilities to facilitate restoration of the system following a black-out situation.

The Lump Sum Payment under the PPA is \$4,640,835.94, based on a Unit Price, as defined in the PPA, of \$230.5699919/MWh as of the execution date of the PPA (the “Unit Price_{Execution Date}”). To address the Company’s credit rating, inflation, changes to the federal Investment Tax Credit (“ITC”) due to the One Big Beautiful Bill Act (“OBBBA”), and federal policies related to tariffs, the Company and Seller agreed to numerous provisions in the PPA, detailed below, that allow the Unit Price_{Execution Date} to be adjusted both upward and downward.

The Unit Price may be adjusted downward, if [REDACTED] [REDACTED] [REDACTED]
[REDACTED]

Under the terms of the PPA, the Unit Price can be increased up to a cap of [REDACTED] (the “Total Adjustment Cap”) without needing to seek further approval of the Commission. Any price increase above the Total Adjustment Cap would be subject to approval by the Commission prior to implementation.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

ATTACHMENT 1

Resource Plan

Year	Base Case: Portfolio without Mahi	Year	Alternate Case: Portfolio
2026	Remove 15 MW Load Build Remove 26 MW Load Reduce Install	2026	Remove 15 MW Load Build Remove 26 MW Load Reduce Install
2027	Install 6 MW 30 MWh Puuloa Solar	2027	Install 6 MW 30 MWh Puuloa Solar
2028		2028	Install 120 MW 480 MWh Mahi Solar
2029	Install 99 MW Puuloa Energy Remove 108.1 MW Waiiau 5-6	2029	Install 99 MW Puuloa Energy Remove 108.1 MW Waiiau 5-6
2030	Install 750 GWh Renewable Energy + 350 MW GFM (363 MW hybrid solar)	2030	Install 750 GWh Renewable Energy + 350 MW GFM (363 MW hybrid solar)
2031	Remove 30 MW Kahuku Wind Remove 169.1 MW Waiiau 7-8	2031	Remove 30 MW Kahuku Wind Remove 169.1 MW Waiiau 7-8
2032	Remove 1 MW KSEP Remove 69 MW Kawaihoa Wind	2032	Remove 1 MW KSEP Remove 69 MW Kawaihoa Wind
2033	Remove 5 MW KS2 Remove 5 MW KREP Remove 164.9 Kahe 1-2 Remove 60 MW Load Build 3 Remove 60 MW Load Reduce 3 Kalaeloa A&R PPA Expires Install 208 MW Kalaeloa Install 252.6 Waiiau Install 232 GWh Renewable Energy (11 MW Standalone Solar, 99 MW Onshore Wind)	2033	Remove 5 MW KS2 Remove 5 MW KREP Remove 164.9 Kahe 1-2 Remove 60 MW Load Build 3 Remove 60 MW Load Reduce 3 Kalaeloa A&R PPA Expires Install 208 MW Kalaeloa Install 252.6 Waiiau Install 232 GWh Renewable Energy (11 MW Standalone Solar, 99 MW Onshore Wind)
2036	Install 2,230 GWh Renewable Energy (400 MW Offshore Wind, 140 MW 560 MWh Standalone BESS)	2036	Install 2,230 GWh Renewable Energy (400 MW Offshore Wind, 140 MW 560 MWh Standalone BESS)
2037	Remove 171.5 MW Kahe 3-4	2037	Remove 171.5 MW Kahe 3-4
2039	Remove 27.6 MW Waianae Solar	2039	Remove 27.6 MW Waianae Solar
2040	Remove 24 MW NPM Wind Install 12 MW 48 MWh Standalone BESS Install 28 MW PV Install 24 MW Onshore Wind	2040	Remove 24 MW NPM Wind Install 12 MW 48 MWh Standalone BESS Install 28 MW PV Install 24 MW Onshore Wind

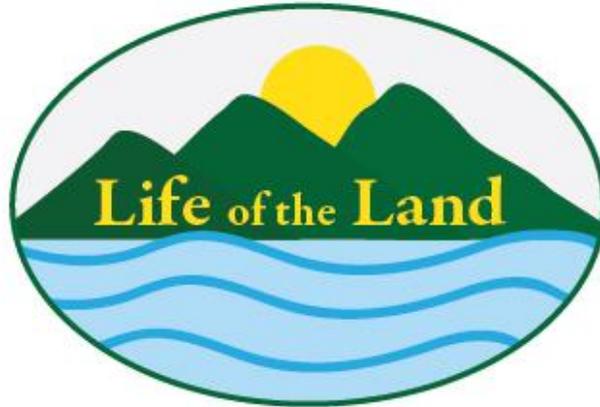
2041	Remove 109.6 MW Clearway Projects
2044	Remove 20 MW West Loch PV
2045	Install 182 MW 728 MWh Standalone BESS Install 1,310 MW 2,619 MWh Aggregated DER BESS Install 1,310 MW Aggregated DER Install 129 MW PV Biodiesel Conversion on all firm units
2046	Remove 269.5 MW Kahe 5-6
2050	Install 27 MW 508 MWh Standalone BESS Install 947 MW 1,894 MWh Aggregated DER BESS Install 947 MW Aggregated DER

2041	Remove 109.6 MW Clearway Projects
2044	Remove 20 MW West Loch PV
2045	Install 182 MW 728 MWh Standalone BESS Install 1,310 MW 2,619 MWh Aggregated DER BESS Install 1,310 MW Aggregated DER Install 129 MW PV Biodiesel Conversion on all firm units
2046	Remove 269.5 MW Kahe 5-6
2050	Install 27 MW 508 MWh Standalone BESS Install 947 MW 1,894 MWh Aggregated DER BESS Install 947 MW Aggregated DER

ATTACHMENT 3

Typical Residential Bill Impact of Mahi (Base Price)

	a	b	c = a - b	d	e = (c/d)/10	f = (500 * e)/100
Year	Mahi Total Revenue Requirement (Current Year \$)	Hawaiian Electric Total Avoided Revenue Requirement (Current Year \$)	Incremental Revenues Required (Current Year \$)	Estimated Hawaiian Electric Sales (MWh)	Estimated Rate Impact (cents/kW h in Current Year \$)	Est Impact on Typical Residential Bill of 500 kWh (Current Year \$)
2028				6,532,425		0.59
2029				6,568,915		1.01
2030				6,640,731		1.12
2031				6,674,592		0.89
2032				6,711,051		(0.32)
2033				6,767,619		(2.96)
2034				6,813,855		(1.63)
2035				6,872,225		(0.61)
2036				6,957,270		(0.49)
2037				7,015,457		(2.12)
2038				7,094,196		(0.48)
2039				7,198,883		(2.25)
2040				7,349,507		(1.73)
2041				7,435,690		(2.03)
2042				7,566,494		(2.93)
2043				7,711,832		(4.17)
2044				7,885,928		(4.68)
2045				8,025,447		(1.56)
2046				8,188,033		(2.17)
2047				8,352,064		(2.23)
2048				8,534,057		(2.60)
2049				8,659,700		(3.18)
2050				8,790,178		(1.06)
2051				8,914,228		(1.38)
2052				9,074,257		(1.63)
2053				9,188,450		(1.47)



P.O. Box 37158, Honolulu, Hawai`i 96837-0158
Phone: 927-0709 henry.lifeoftheland@gmail.com

COMMITTEE ON WAYS AND MEANS
Senator Donovan M. Dela Cruz, Chair
Senator Sharon Y. Moriwaki, Vice Chair

Thursday, February 25, 2026
10:57 AM
Conference Room 211

SB 2497 SD1 Electric Bills

OPPOSE

Aloha Chair Dela Cruz, Vice Chair Moriwaki, and Members of the Committee

I have represented Life of the Land in 65 PUC proceedings over the past 30 years.

I believe the info sought in the bill would be costly for the utility to generate, the costs would be passed onto ratepayers, less than 0.1% of the population would be able to do the calculations, and far less would want to spend the 100s and 1000s of hours to understand the assumptions and models and conduct the sensitivity analyses.

Real Transparency

Renewable energy % of Bill	Average Cost / kWh
Fossil fuel % of Bill	Average Cost / kWh

Henry Curtis
Executive Director



Testimony Before the Senate Committee on Ways and Means
and Senate Committee on Energy and Intergovernmental Relations

By Scott Sato

Government Affairs and Energy Services Manager

Kaua'i Island Utility Cooperative

4463 Pahe'e Street, Suite 1, Lihu'e, Hawai'i, 96766-2000

Wednesday, February 25, 2026; 10:57 am

Conference Room #211 & Videoconference

Senate Bill No. 2497, Senate Draft No. 1 – RELATING TO ELECTRIC ENERGY

To the Honorable Chair Donovan M. Dela Cruz, Vice Chair Sharon Y. Moriwaki and Members of the Committee:

Kaua'i Island Utility Cooperative (KIUC) is a not-for-profit utility providing electrical service to more than 34,000 commercial and residential members.

KIUC opposes this measure.

KIUC supports transparency and accountability in utility regulation and has a strong history of working collaboratively with the Public Utilities Commission (PUC) to provide information necessary for effective oversight. However, even with the amendments approved by the previous committees, SB 2497 SD 1 raises concerns by potentially requiring the public disclosure of information that is more appropriately reviewed and evaluated by the PUC in the first instance.

KIUC believes the PUC is best positioned to review bill impact analyses and determine whether specific information should be made public or allowed to remain confidential. The PUC already has established procedures and expertise to balance the public interest in transparency with the legitimate need to protect sensitive information.

There are often valid and necessary reasons why KIUC cannot publicly disclose all components of a bill impact analysis. These reasons include, but are not limited to:

- Protecting competitive and market-sensitive information that could place the cooperative at a disadvantage;
- Avoiding the compromise of ongoing or future negotiations related to power purchases, contracts, or infrastructure development; and

- The complexity and preliminary nature of certain data, which may be subject to assumptions, evolving inputs, or proprietary methodologies that are not well-suited for public release without proper regulatory context.

Mandating disclosure without allowing the PUC to make confidentiality determinations could inadvertently harm KIUC’s ability to operate efficiently and prudently on behalf of its member-owners.

For these reasons, KIUC respectfully requests that SB 2497, SD 1 be deferred.

Thank you for the opportunity to provide comments on this measure. Mahalo for your consideration.

To: Senator Donovan M. Dela Cruz, Chair
Senator Sharon Y. Moriwaki, Vice Chair
Committee on Ways and Means

From: Veronica Moore, Individual Citizen

Date: February 24, 2026

RE: Senate Bill 2497 SD1
Measure Title: RELATING TO ELECTRIC ENERGY.
Report Title: PUC; Electric Utilities; Bill Impact Analyses; Customer
Transparency; Ratepayers; Reports

To All Concerned,

My name is Veronica Moore and I support Senate Bill 2497 SD1. Thank you for your consideration.

Sincerely,

Veronica M. Moore