

August 7, 2024

VIA E-FILING

The Honorable Chair and Members of the
Hawai'i Public Utilities Commission
465 South King Street
Kekuanao'a Building, Room 103
Honolulu, HI 96813

Re: (Non-Docketed) Case No. 2023-04661 – Manele Water Resources, LLC's
Submission of Utility Natural Hazard Mitigation Report

Dear Commissioners:

Manele Water Resources, LLC hereby submits its Natural Hazard Mitigation Report pursuant to Order No. 40396, filed on November 21, 2023 in Case No. 2023-04661 (non-docketed).¹ If you have any questions, please contact the undersigned.

Thank you for your attention to this matter.

Very truly yours,

WATANABE ING LLP

By: /s/ David Y. Nakashima
DAVID Y. NAKASHIMA

Enclosure
2018206.1

cc: Division of Consumer Advocacy (*via e-mail*)

¹ By Order No. 40669 *Granting Hawaiian Electric's Request for Extension of Time to File Natural Hazard Mitigation Reports*, filed on March 19, 2024 in Case No. 2023-04661 (non-docketed), the Commission granted all public utilities an extension of time from May 21, 2024 to August 21, 2024 to file their Utility Natural Hazard Mitigation Reports.

Background

On November 21, 2023, the Public Utilities Commission (“PUC”) issued Order No. 40396 “Directing Public Utilities to Develop and File Reports Related to Their Efforts And Future Mitigation Plans to Address Natural Hazards.”¹ In summary, the Order directed all Public Utilities to each provide a Report to the Commission, to be filed within the next six (6) months (i.e., by May 21, 2024).² On March 19, 2024, the PUC granted Hawaiian Electric’s request for an extension of time from May 21 2024 to August 21, 2024 to all Public Utilities in Order No. 40669.³ As such, Mānele Water Resources (“MWR”) hereby submits its response to the PUC’s request in Order No. 40396.⁴

1. Identification of Mitigation/adaption plans for natural hazards, including wildfires, red flag events, hurricanes, volcanic activity, earthquakes, floods, landslides.
 - a. Plan objectives, goals, and key performance indicators and metrics

| Name of Natural Hazard | Mitigation/Adaption Plan | Objectives of Plan | Goals of Plan | Indicators/Metrics of Plan |
|------------------------|--------------------------|--------------------|-------------------|----------------------------|
| Wildfires | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 |
| Hurricanes | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 |
| Tsunami | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 |
| Earthquakes | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 |
| Floods/Landslides | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 | Exhibit A, Page 2 |

- b. The utility’s cultural values and expectations around safety and natural hazard mitigation and preparedness;

MWR is part of Pūlama Lāna’i’s⁵ organization and as such shares the same values:

- E Ho’ohanohano: Respect,
- E Ho’oha’aha’a: To be humble (in all we do),

¹ Non-Docketed Case No. 2023-04661 “Directing Public Utilities to Develop and File Reports Related to Their Efforts And Future Mitigation Plans to Address Natural Hazards” issued on November 21, 2023.

² Ibid page 4.

³ Non-Docketed Case No. 2023-04661 “Directing Public Utilities to Develop and File Reports Related to Their Efforts And Future Mitigation Plans to Address Natural Hazards” issued on March 19, 2024.

⁴ Non-Docketed Case No. 2023-04661 “Directing Public Utilities to Develop and File Reports Related to Their Efforts And Future Mitigation Plans to Address Natural Hazards” issued on November 21, 2023, Pages 5 to 7.

⁵ MWR is wholly-owned subsidiary Lāna’i Resorts, LLC (“LRL”). LRL is a Hawai’i Limited Liability Company doing business as Pūlama Lāna’i.

- E Po’okela: Excellence,
- E Mālama iā Lāna’i: To care for Lāna’i as it cares for us,
- E ‘Ike Pono: To be of good spirit and mind.

These values guide us in achieving our mission, “To build a sustainable future for the island of Lāna’i by preserving our culture, building economic opportunity, stewarding our lands, and investing in our people.” By executing our mission each day, we continue to achieve our vision, “A self-sustaining vibrant island community where people and future generations thrive.”

MWR is responsible for providing reliable wastewater services to its service territory. In addition, MWR produces recycled water for irrigation purposes, which is a valuable re-use of wastewater effluent and subsequently reduces the use of drinking water for irrigation. Our commitment to our values help us achieve these specific goals, including our commitment to safety and preparedness.

c. Lessons learned from past natural hazard events;

There has been one major hazard event since 2012, see summary below.

| | |
|--|--|
| Hazard Event Date(s) | 1/21/2017 (Saturday) |
| Hazard Event Type (e.g., Wildfire, Windstorm, etc.) | Windstorm, loss of electrical power for three (3) days. |
| Emergency Proclamation (if yes, by whom) | No |
| Summary of Hazard Event | During a severe wind storm (winds up to 68 mph) on January 21, 2017, nineteen (19) Hawaiian Electric (“HECO”), fka Maui Electric, utility poles were damaged and downed. This caused a power outage to the entire island of Lāna’i for three (3) days. |
| Impact to MWR Assets (if yes, please describe) | None |
| Estimated Damage to MWR Assets | None |
| Lessons Learned | <ol style="list-style-type: none"> 1. Several areas, including Richard’s Market, the Central Office, and the Fleet Base yard, would need backup power generation. 2. HECO would need to harden pole lines or install underground lines along Miki Road. 3. Communications were down, no cell service, no internet, and there needed to be better communication with the residents and HECO/Emergency Operations Center (EOC). |

| | |
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| Implementation of Future Mitigation Measures | <ol style="list-style-type: none"> 1. Pūlama Lānaʻi purchased several new generators for its essential operations. 2. HECO replaced all the down poles, and a year later braced each pole for added stability and support. Undergrounding was not an option because of the cost. 3. The EOC and Pūlama Lānaʻi invested in mobile digital communications boards, additional radios, and satellite phones to improve communication. |
|---|--|

- d. Service territory information, including information regarding utility infrastructure, environmental conditions/relevant natural features, communities and regions at risk, critical facilities/customers, vulnerable or special needs customers, and environmental compliance and permitting issues and risks;

| Requested Information | Response | Confidential |
|---|----------------------|--|
| Service Territory Map (include mains, wells, pumps, reservoirs, generators) | Exhibit A, Page 3 | Yes, critical infrastructure asset locations are identified. |
| Identify Regions at Risk | Exhibit A, Pages 4-6 | Yes, critical infrastructure asset locations are identified. |
| Vulnerable / Special Needs Customers | None | No |

- e. Description of risk assessment methodology and process used to identify, describe, and prioritize mitigation of disaster risks and drivers for those risks;

MWR used a vulnerability based methodology to identify deficiencies in the drinking water system infrastructure, which identified the highest probability of disrupting service to our customers during and after a natural hazard event. The process identified natural hazard events by probability, identifying weaknesses in the water system infrastructure based on the disaster and the mitigation required before the natural hazard event and the steps for recovery.

| Natural Disaster | Risk/Vulnerability | Mitigation Before Event | Recovery After Event |
|-------------------------|--|---|--|
| Wildfire | Mānele Wastewater Treatment Facility and wastewater pump stations. | <ul style="list-style-type: none"> • Clear vegetation fifty (50) feet back from MWR's infrastructure | <ul style="list-style-type: none"> • Assess damage and provide backup power where needed. |

| Natural Disaster | Risk/Vulnerability | Mitigation Before Event | Recovery After Event |
|-----------------------|---|---|--|
| | | <ul style="list-style-type: none"> perimeter fence line. • Harden structures with fire resistant material. | |
| Hurricane | Mānele Wastewater Treatment Facility, wastewater pump stations and Recycled Water (“R-1”) pond | <ul style="list-style-type: none"> • Ensure that there is an inventory of parts, including R-1 pond liner material and sandbags available. • Relocate back up power generators before an event. | <ul style="list-style-type: none"> • Assess damage and provide backup power where needed. |
| Tsunami | <p>Mānele wastewater pump station #1.</p> <p>Mānele Small Boat Harbor wastewater pump station.</p> <p>Hulopo’e Beach Park collections system.</p> | <ul style="list-style-type: none"> • Remove backup power generator at wastewater pump station #1. • Cover collections system manhole covers to stop the ocean water flooding. | <ul style="list-style-type: none"> • Assess damage and provide backup power where needed. |
| Earthquake | System infrastructure | <ul style="list-style-type: none"> • Inventory and confirm material and equipment for repairs is available. | <ul style="list-style-type: none"> • Inventory system for damage and repair as needed. |
| Flooding / Landslides | Mānele Water Resources faces minimal vulnerability from flooding and landslides | <ul style="list-style-type: none"> • Ensure drainage in and around facilities are properly maintained. | <ul style="list-style-type: none"> • Assess damage and if there is any, remedy damage. |

- f. Natural hazard mitigation strategy development, including discussion of key processes and scoping, stakeholder engagement, mitigation prioritization and selection, and measuring the effectiveness of mitigation initiatives;

See **Exhibit A: Mānele Water Resources Natural Hazard Mitigation Plan** for summary as well. Each table identifies a hazard type and subsequent mitigation strategy, actions, procedures and on-island partners.

| | |
|---|--|
| Hazard Type (e.g., wildfire, windstorm, etc.) | Wildfire |
| Mitigation Strategy Description | Maintain a fifty (50) foot vegetation setback from the fenceline perimeter of MWR infrastructure. Harden facilities with fire retardant paint and install a sprinkler system to protect structures. |
| Action (Development) Plan Description | Cut back vegetation and identify infrastructure that needs to be hardened |
| Procedure during Event | <ol style="list-style-type: none"> 1) Inform the Fire Department of the fire's location by calling 911. 2) If it is a structural fire, terminate the electrical power to the structure, if possible. 3) Ensure access to fire is open and clear for the fire department or other authorities. 4) Identify water sources for the Fire Department's use. 5) Contact Director / Superintendent of MWR and inform them of the fire and details. Discuss well operation to ensure that well levels are maintained, if necessary. 6) Once the fire is extinguished, assess the damage and identify if the system is operational. 7) Notify Director/Superintendent of MWR of system damage. |
| On-island Partners during Event (e.g., list internal PL teams and external partners) | Pūlama Lānaʻi Aqua Engineers Inc. County of Maui, Department of Fire & Public Safety County of Maui, Department of Public Works Hawaiian Electric |

| | |
|--|--|
| Hazard Type (e.g., wildfire, windstorm, etc.) | Hurricane |
| Mitigation Strategy Description | Maintain a fifty (50) foot vegetation setback from the fenceline perimeter of MWR infrastructure. Design hardened structures for equipment storage. |
| Action (Development) Plan Description | Install backup power generation at Well 2 and Well 7. Well 7 is expected to be in service by Q1 2025. Finalize list of infrastructure to be strengthened. Initiate design and budget process. |

| | |
|---|---|
| Procedure during Event | <p>5 DAYS OUT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Review Incident Command (IC)⁶ structure and expectations <input type="checkbox"/> Account for expected manpower before, during, and after event. <input type="checkbox"/> Position 350 kW generators at Well 2 and Well 7. <input type="checkbox"/> Fuel check for large equipment and generators. <input type="checkbox"/> Test truck portable communication radios. <input type="checkbox"/> Clean shop and sites to secure any loose items <input type="checkbox"/> Check chlorine test kits for post event testing <p>3 DAYS OUT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Refuel all equipment <input type="checkbox"/> Stage 500 kW generator at Well 3. <input type="checkbox"/> Service generators at Well 8 and Well 14 <input type="checkbox"/> Begin to top off water system tanks <input type="checkbox"/> Review water system shut down plan <input type="checkbox"/> Account for personnel home preparedness <p>1 DAY OUT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Meeting with staff on IC expectations, shifts, info and locations for response. <input type="checkbox"/> Review of post event meeting site and communications. <input type="checkbox"/> Begin shut down of fire hydrants valves to isolate system. <input type="checkbox"/> Position small generator at Hi'i chlorinator. <input type="checkbox"/> Prepare equipment and tools <input type="checkbox"/> Switch OFF solar farm (currently inoperable) <input type="checkbox"/> Meet with HECO <input type="checkbox"/> Close up and secure utility sites <p>DAY OF EVENT Shut down water system / Disengage power.</p> <p>POST EVENT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Under IC structure. <input type="checkbox"/> Chlorine test water system <input type="checkbox"/> Assess damage and develop cost analysis for repairs. |
| On-island Partners during Event (e.g., list internal PL teams and external partners) | <p>Pūlama Lāna'i Aqua Engineers Inc. County of Maui, Department of Fire & Public Safety County of Maui, Department of Public Works</p> |

⁶ Incident Command (IC) is part of Pūlama Lāna'i's Emergency Preparedness and is led by Pūlama Lāna'i. Lāna'i Water Company is a part of the IC structure.

| | |
|--|---|
| | Hawaiian Electric Lānaʻi Oil Company |
|--|---|

| | |
|---|--|
| Hazard Type (e.g., wildfire, windstorm, etc.) | Tsunami |
| Mitigation Strategy Description | Identify tsunami inundation area. |
| Action (Development) Plan Description | Develop SOP for relocation of pump station #1 generator and power de-energizing. |
| Procedure during Event | <ol style="list-style-type: none"> 1) Once tsunami “Watch” is called, Director / Superintendent of MWR will monitor radio and emergency channels for status. Inform MWR staff of pending call out. 2) Confirm reservoir levels. 3) When tsunami “Warning” is confirmed, shut down the water system to Hulopoʻe Beach Park, Mānele Small Boat Harbor and Kaumālapaʻu Harbor. 4) After tsunami, identify damage and activate system if possible. Notify Director/ Superintendent of MWR of identified infrastructure damage. |
| On-island Partners during Event (e.g., list internal PL teams and external partners) | Pūlama Lānaʻi Aqua Engineers Inc. County of Maui, Department of Fire & Public Safety County of Maui, Department of Public Works Hawaiian Electric |

| | |
|--|--|
| Hazard Type (e.g., wildfire, windstorm, etc.) | Earthquake |
| Mitigation Strategy Description | Design infrastructure projects to meet State of Hawaii / County of Maui standards. |
| Action (Development) Plan Description | Inventory facilities and develop a replacement parts list required to ensure replacement inventory is available at all times. |
| Procedure during Event | <ol style="list-style-type: none"> 1) Meet at the office for system inventory assignments. 2) Shut down the system as needed and disengage power to wells. 3) Notify the Superintendent of any damage found, and repairs needed. 4) Confirm emergency generators are operational. 5) Director / Superintendent to provide cost analysis for infrastructure repairs. |

| | |
|---|---|
| On-island Partners during Event (e.g., list internal PL teams and external partners) | Pūlama Lānaʻi Aqua Engineers Inc. County of Maui, Department of Fire & Public Safety County of Maui, Department of Public Works Hawaiian Electric |
|---|---|

| | |
|---|--|
| Hazard Type (e.g., wildfire, windstorm, etc.) | Flood / Landslide |
| Mitigation Strategy Description | Inventory facilities and develop short-term recommendations. |
| Action (Development) Plan Description | Install water diversion channels and storm drains to protect facilities. Identify alternate egress and ingress routes to facilities. |
| Procedure during Event | <ol style="list-style-type: none"> 1) Clear building drains and gutters before rain event. 2) Clear streams crossings and road culverts. 3) Identify alternate egress and ingress to facilities. 4) Inventory buildings, roads and stream crossings after the event. 5) Director / Superintendent to provide cost analysis for infrastructure repairs |
| On-island Partners during Event (e.g., list internal PL teams and external partners) | Pūlama Lānaʻi Aqua Engineers Inc. County of Maui, Department of Fire & Public Safety County of Maui, Department of Public Works Hawaiian Electric |

- g. Natural hazard mitigation measures, including infrastructure design, operations, and maintenance; vegetation management and inspections, if applicable; situational awareness and forecasting; community outreach and engagement; staff training and workforce planning, and public safety measures;

MWR is a small utility serving thirty two (32) customers.⁷ Aqua Engineers Inc. is contracted by MWR to operate the wastewater facility in Mānele. Aqua Engineers Inc. is in communication with Pūlama Lānaʻi's Director of Utilities on matters related to the operation of MWR. Community engagement and education are provided at community events hosted by Pūlama Lānaʻi, including quarterly in-person open house formats. In collaboration with Pūlama Lānaʻi, we post hazard signs on Lānaʻi Avenue as well as on the Lanai96763 website and Facebook page.

⁷ Number of customers as of July 2024 billing. The number of customers is different than the number of service accounts. For example, you may have one customer with several accounts.

- h. Planned projects/programs to address or implement identified natural hazard mitigation measures and system resiliency;

There are no planned projects at this time.

- i. Planned projects/programs to address or implement identified natural hazard mitigation measures and system resiliency;

See response to Item 1.h above.

- j. Practices surrounding data collection and reporting on identified key performance indicators/metrics;

| Data Source | Frequency of Obtaining Data (e.g., daily, weekly, etc.) | Data is used for information regarding this type of hazard (e.g., wildfire, windstorm, etc.) | How is data used in addressing hazard mitigation? |
|------------------------|--|---|---|
| Mānele Water Resources | Once per year | Wildfire | MWR completes visual inspections to ensure vegetation is cut once per year around critical assets at risk for the hazard. |
| Mānele Water Resources | Once Per Year | Hurricane | MWR completes visual inspections to ensure vegetation is cut once per year around critical assets at risk for the hazard. |
| Mānele Water Resources | Once Per Year | Earthquake | MWR completes annual physical inspections to identify infrastructure deficiencies. |
| Mānele Water Resources | Once Per Year | Flood/Landslide | MWR completes annual physical inspection of roads, drain culverts and topography changes in and around critical assets that are at risk for the hazard. |

2. Past Utility hazard response plans and lessons learned from past events;

See response to Item 1.c above.

3. Utility pre- and post-hazard mobilization and response guidelines, procedures and checklists, responsible persons and work duties before, during, and after an emergency event, emergency control center information (establishment details, functions, rules for reporting and recordkeeping, required personnel, and equipment), and personnel safety;

See response to Item 1.e and Item 1.f above.

4. Communications and reporting, including, but not limited to, coordination with outside organizations (including the Commission, other State agencies, and federal agencies), customer notification, and services for customers (including those with special needs);

See **Exhibit B: Mānele Water Resources Emergency Communications Plan**. Information contained in this plan should be treated as confidential and not for public dissemination. It should be redacted and under protective order for PUC access only.

5. Damage assessment, restoration priorities, and materials management plans;

See response to Item 1.e and Item 1.f above.

6. Business continuity plans for during or after a natural hazard event (including information regarding a Utility's relevant insurance coverage, reporting to the PUC on the financial health of the Utility, prioritization plans for dockets/projects/programs, and notices to relevant governmental agencies regarding major effects on the Utility's operations or finances).

MWR is a wholly-owned subsidiary of LRL. MWR has and will continue to rely on financial support from LRL in the event of a natural hazard event. MWR is a named insured on the company's property policies with limits of \$20 million and is also named insured on the company's casualty insurance policies. MWR will work with its insurance broker to quantify financial losses and submit any disaster claims. MWR's finance team is located in Honolulu, geographically separate from MWR's operations, and uses cloud based financial accounting systems.

MWR will continue to maintain regulatory compliance, to the extent possible, during the response to a natural hazard event.

Mānele Water Resources

Natural Hazard Mitigation Plan

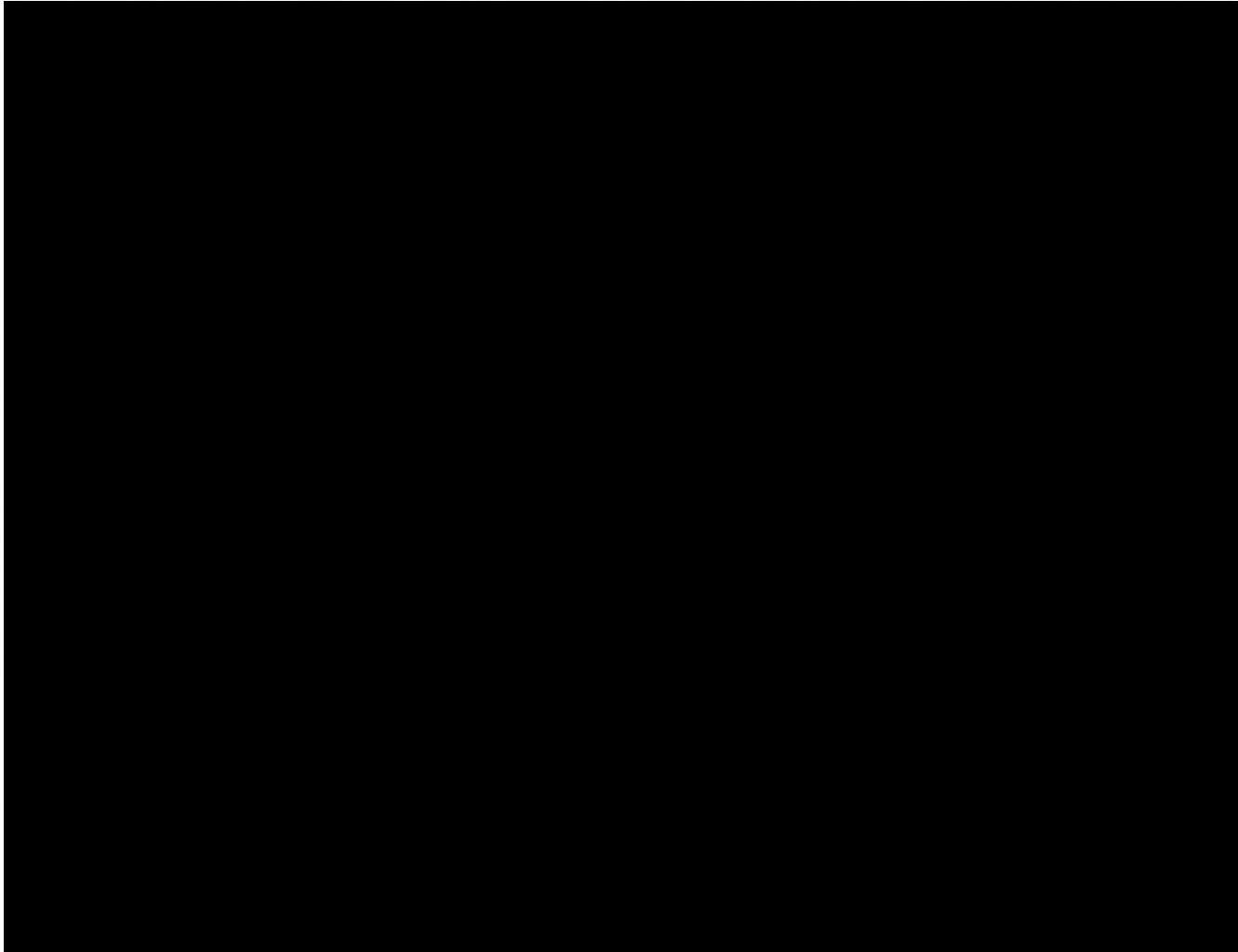
Objective / Goal

The objective of the Mānele Water Resources (“MWR”) Natural Hazard Mitigation Plan (“NHMP”) is to identify MWR infrastructure that may be affected by natural disasters, including but not limited to, wildfires, hurricanes, flooding, tsunamis, earthquakes, and flooding / landslides. MWR NHMP identifies mitigation recommendations for the short and long term range. In addition, indicators and metrics are provided to measure and track progress of the NHMP.

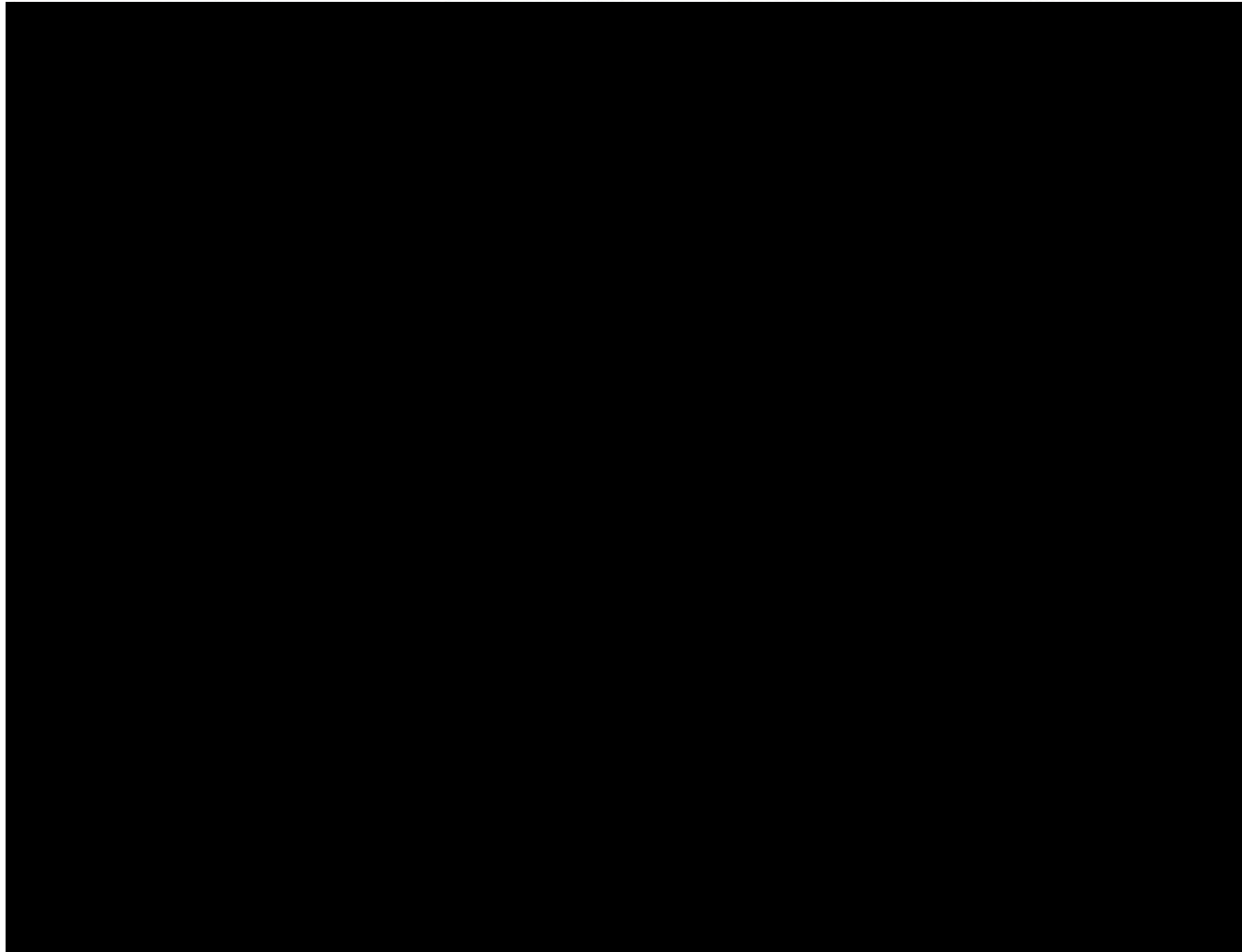
Natural Hazards are listed in order of severity to the infrastructure of MWR.

| Natural Hazard | Mitigation Recommendation | Short Term Goals 1-2 Years | Long Range Goals 3-5 Years | Indicator / Metrics |
|-----------------------|---|--|--|--|
| Wildfire | Maintain a fifty (50) foot vegetation setback from the fenceline perimeter of MWR infrastructure. Protect Motor Control Center structures with fire retardant paint. | Cut back vegetation to maintain a fifty (50) foot setback. Inventory structures, Develop fire mitigation project list and budget. | Develop long range budgeting for fire vegetation mitigation. Initiate project to harden infrastructure from wildfires.. | Yearly inspections of vegetation setbacks. Using project milestones track fire protection plan progress. |
| Hurricane | Inventory facilities and Develop a procedure to de-energize infrastructure. | Clear vegetation back and inventory structures. Develop facilities de-energizing Standard Operating Procedure (“SOP”). | Upgrade structures to County of Maui hurricane design standards (greater than 5 years). | Yearly review and update of de-energizing SOP. |
| Tsunami | De-energize wastewater pump station #1. | Develop facilities de-energizing SOP. | Relocate wastewater pump station #1 out of tsunami zone. (greater than 5 years). | Review SOP annually with staff. |
| Earthquake | Design projects to meet State / County earthquake standards. | Inventory utility replacement material and equipment supplies. Standardize on site back up inventory. | Upgrade structures to County of Maui hurricane design standards (longer than 5 years). | Annual inspection of inventory and using project milestones track progress to upgrade structures to County of Maui hurricane design standards. |
| Flood/ Landslide | Monitor construction in and around the facilities to ensure that there are no significant changes in topography. Maintain access roads to facilities | Develop access map to facilities that identify alternate routes to and from facilities.. | Install protective drainage as needed around facilities. | Annual inspection of drainage system near and around facilities. |

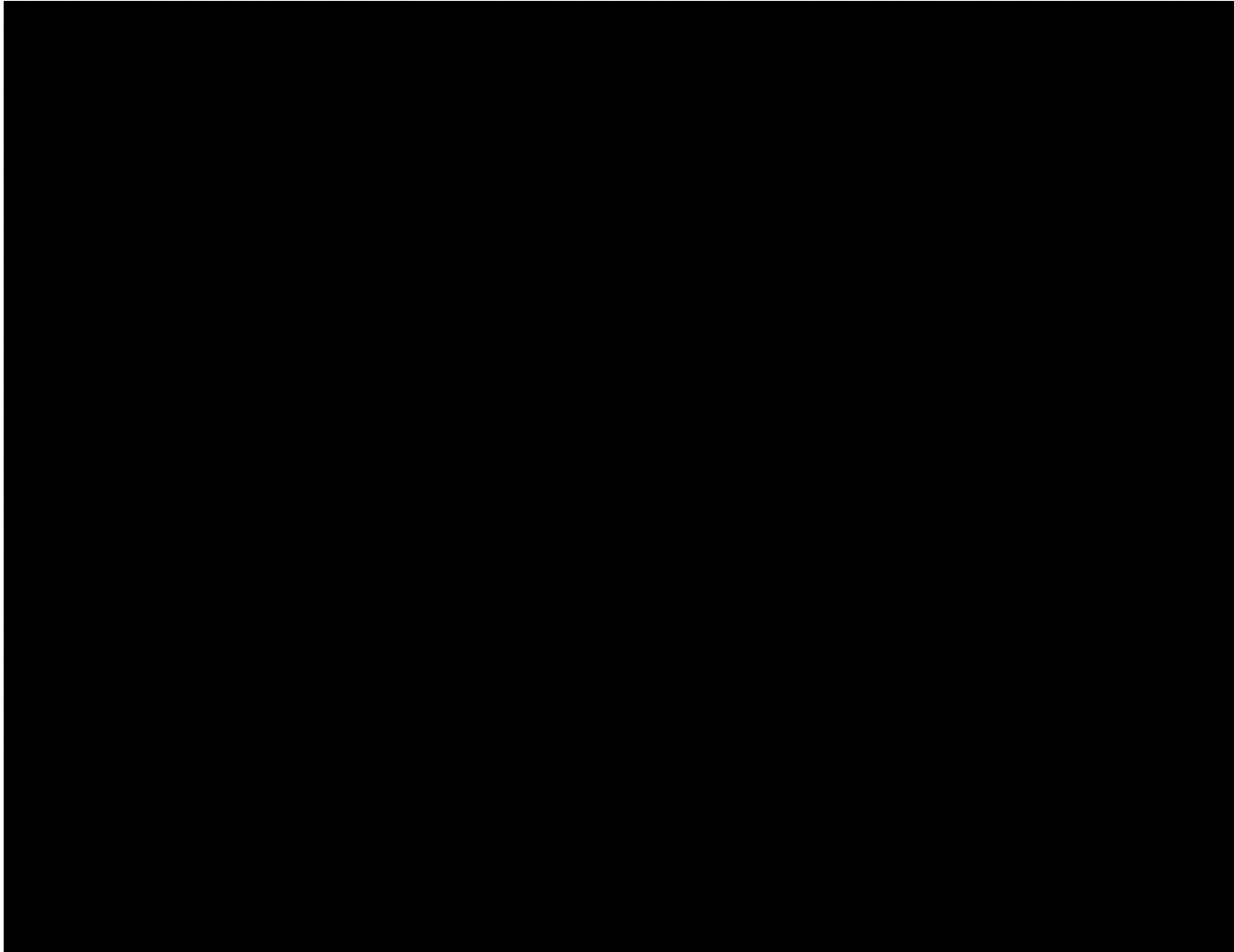
****Identification of critical infrastructure –request to be treated as confidential under protective order****



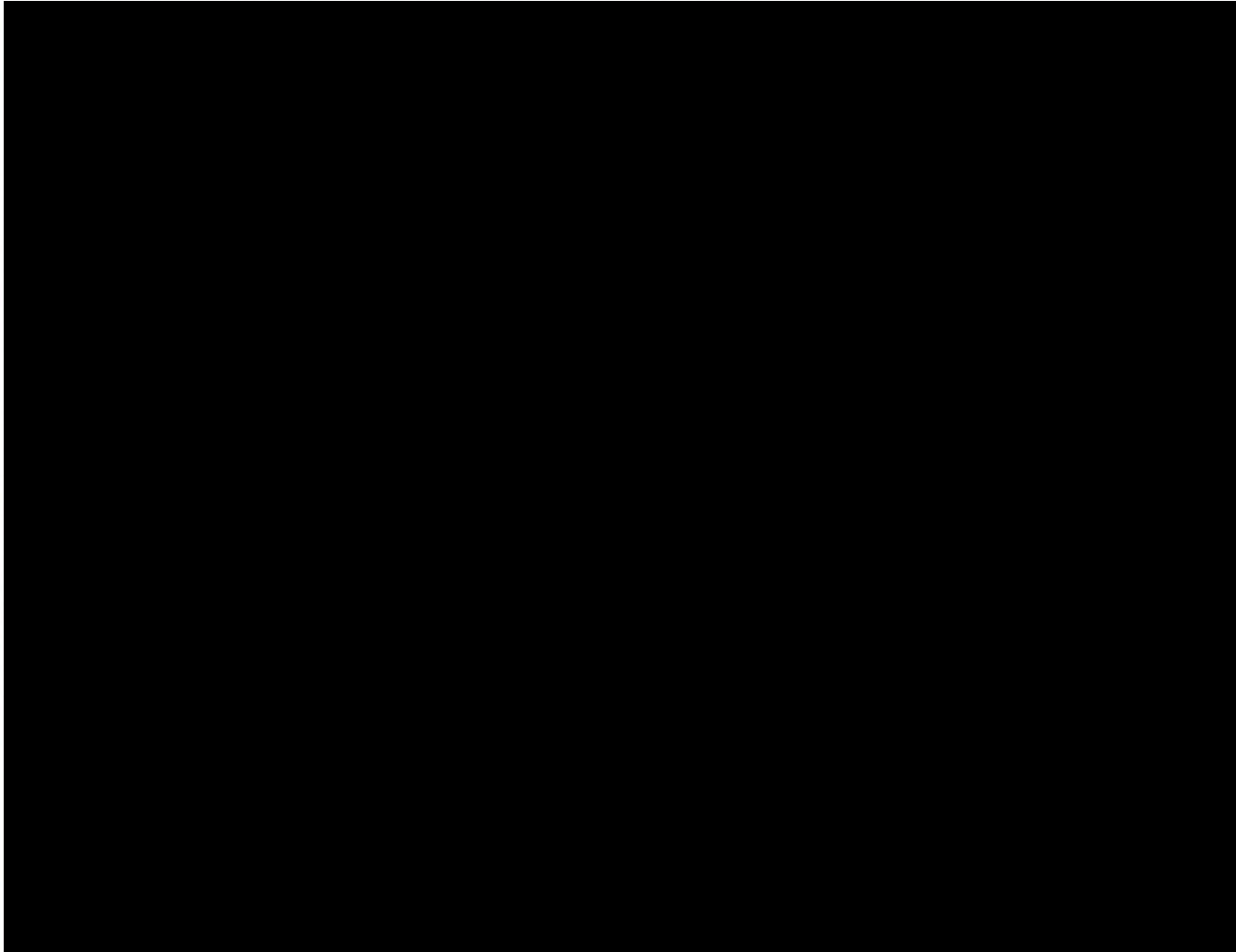
Mānele Water Resources Service Territory Map, identifying sewer water lines and sewer pump station locations.



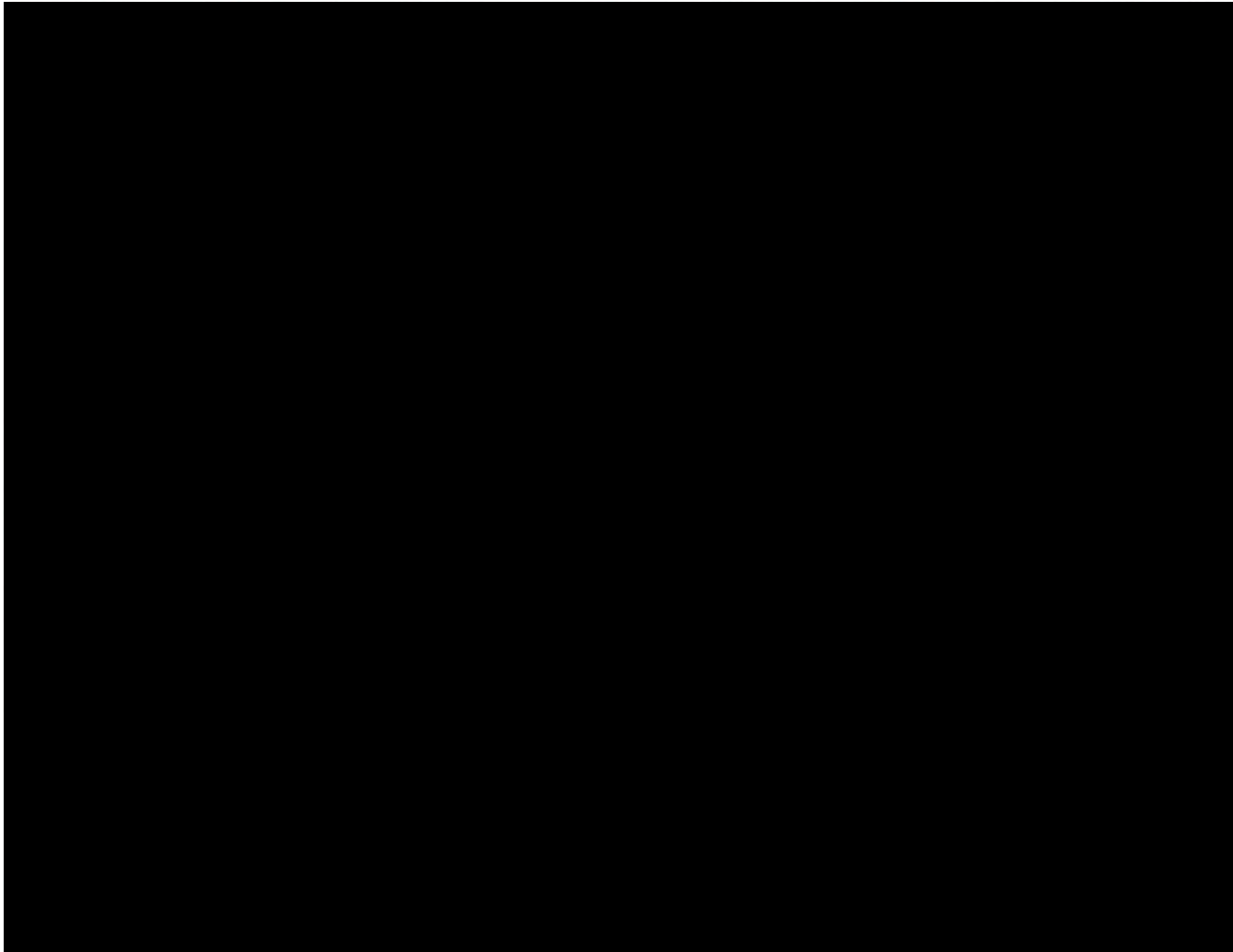
Identification of areas that may be at risk to MWR assets, if there is a wildfire risk in the vicinity.



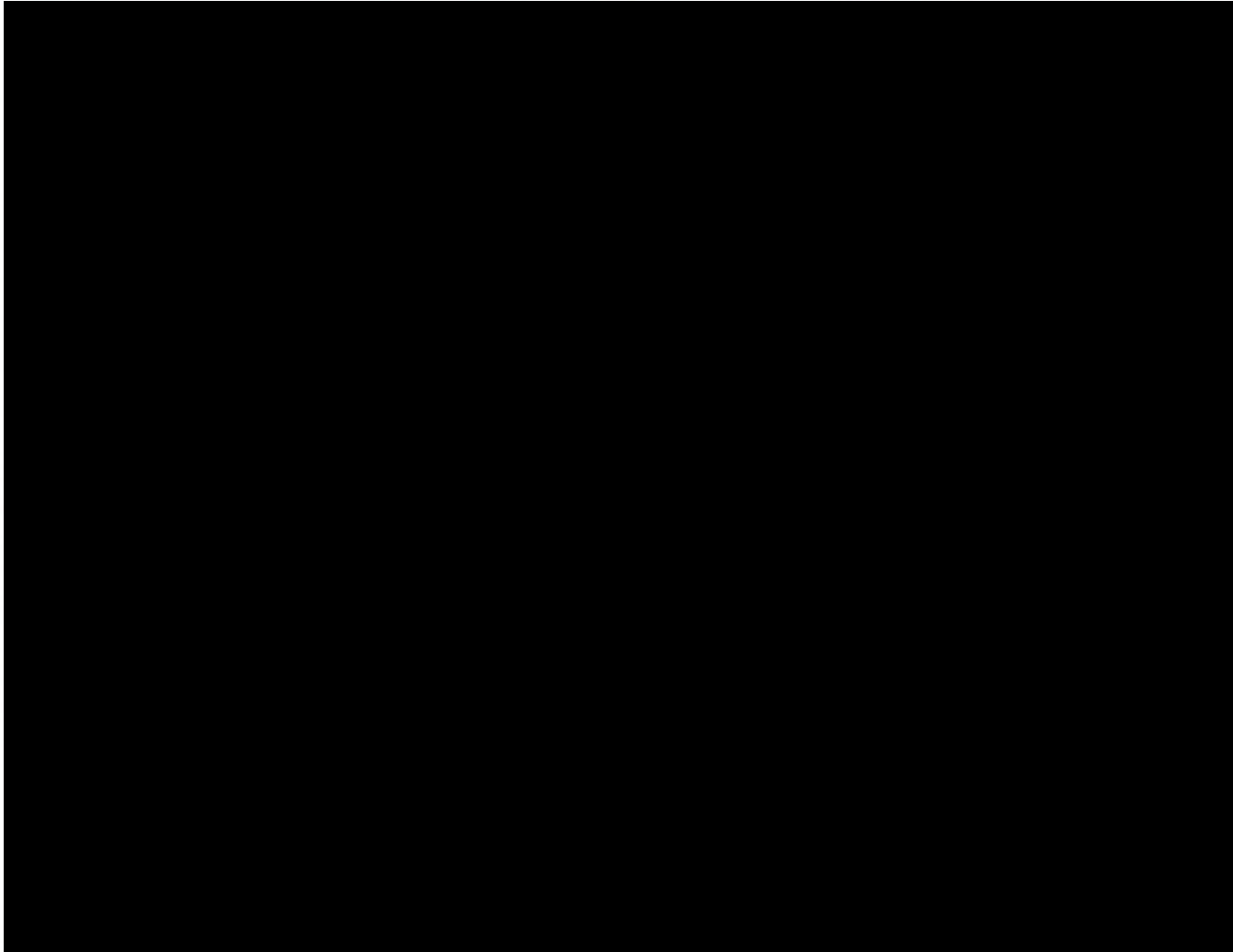
Identification of areas that may be at risk to MWR assets, if there is a hurricane risk in the vicinity.



Identification of areas that may be at risk to MWR assets, if there is a tsunami risk in the vicinity.



Identification of areas that may be at risk to MWR assets, if there is an earthquake risk in the vicinity.



Identification of areas that may be at risk to MWR assets, if there is a flood / landslide risk in the vicinity.



LĀNAʻI UTILITIES
P.O. Box 630310
Lānaʻi City, Hawaiʻi 96763
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Mānele Water Resources

EMERGENCY COMMUNICATIONS PLAN

Revised: 6/20/2024

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1. Emergency Communications
2. Priority Customers
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1. Emergency Communications:

Mānele Water Resources ("MWR") has developed the following communications plan to assist in its response to emergencies and/or natural disasters that are likely to affect its operation. Disaster/emergencies that are likely to occur in MWR's service area include Wildfires, Hurricanes, Tsunamis, Earthquakes, and Floods / Landslides. Extended power outages due to grid power equipment failure may also create wastewater emergencies requiring communication with customers and stakeholders.

2. Priority Customers:

- Four Seasons Resort, Lānaʻi located at 1 Mānele Road, Avi Phookan (General Manager), 202-230-4087 (mobile).

3. Contractors:

- 1) Aqua Engineers, [REDACTED]
- 2) Good Fellow Brothers, [REDACTED]
- 3) Keo Konstruction, [REDACTED]

4. Communication Channels:

Updates will be posted on the following communication channels and updated as information is available.

- Lānaʻi Water Company recorded voicemail line: 808-565-3664
- Lanai96763 Facebook
- Lanaiwatercompany.com
- Lanai96763.com
- Physically visit door to door (if needed)

| Media Outlet | Contact Information |
|---------------------|--|
| Maui News | 808-244-3981 citydesk@mauinews.com |
| Pacific Radio Group | 808-877-5566 |
| KAOI Radio Group | 808-244-9145 |
| Hawaii Public Radio | 808-955-8821 808-792-8233 (after hours) news@hawaiipublicradio.com |

5. Emergency Contact Information:

| Stakeholder | Contact Person | Contact Information | Role |
|--|-------------------------------|--|--|
| Lānaʻi Water Company | [REDACTED] | [REDACTED] | LWC point person |
| Lānaʻi Water Company | [REDACTED] | [REDACTED] | LWC point person |
| Lānaʻi Water Company | [REDACTED] | [REDACTED] | LWC point person |
| Lānaʻi Water Company | [REDACTED] | [REDACTED] | Set up LWC voicemail |
| State Department of Health (DOH) | Engineering Section | [REDACTED] | State point person |
| Maui County Department of Water Supply (DWS) | [REDACTED] | water.supply@mauicounty.gov [REDACTED] | County point person |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Field calls |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Social media and website updates |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Fleet |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Back-up support |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Awareness |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Awareness |
| Pūlama Lānaʻi | [REDACTED] | [REDACTED] | Awareness |
| Four Seasons | Landscaping Supervisor Mānele | [REDACTED] | Stop irrigation and implement water rationing measures |
| Four Seasons | [REDACTED] | [REDACTED] | Mānele Hotel Operations |
| Four Seasons | General Manager | [REDACTED] | Notify guests as appropriate and take other actions |
| Four Seasons | [REDACTED] | [REDACTED] | Kōʻele Resort |
| Mānele & Kōʻele HOA | [REDACTED] | [REDACTED] | Notify homeowners |

| Stakeholder | Contact Person | Contact Information | Role |
|-------------|----------------|---------------------|-----------------|
| Media | | | Media inquiries |

6. Public Notification Forms:

Natural Disaster

A natural disaster such as an earthquake or hurricane has the potential to interrupt wastewater service. Depending on the disaster, the EOC or Maui Police Department may take the lead and Pūlama Lānaʻi will help disseminate information and updates through its communications channels.

MĀNELE WASTEWATER – SEWAGE SPILL OVER 1,000 GALLONS

In the event of a sewage spill great than 1,000 gallons, a press release must be distributed according to **Section 7 of the DOH Wastewater Spill Requirements**.

Communications Template for wastewater spill

The press release will need to include the following information, at minimum:

- Location of the spill
- Amount of wastewater released
- What caused the spill
- What is being done to correct the situation
- Public should not enter areas marked with signs saying “Do not enter – sewage spill”
- Media contact: Lyssa Fujie, iQ360

Notification

At minimum, the press release shall be faxed, emailed or telephoned to the following

| Outlet/Agency | Contact Information |
|--|--|
| Maui News | 808-244-3981 [REDACTED] citydesk@mauinews.com |
| Star-Advertiser | citydesk@staradvertiser.com |
| DOH Communications Office, Oahu | 586-4442 (Phone) 586-4444 (Fax) |
| Clean Water Branch (for spills in state waters) | 586-4309 (Phone) 536-4352 (Fax) |
| Wastewater Branch (for spills in non-state waters) | 586-4294 (Phone) 586-4352 (Fax) |
| Maui District Health Office | 984-8234 (Phone) 984-8237 (Fax) |

(Non-Docketed) Case No. 2023-04661
Manele Water Resources, LLC's Submission of Utility Natural Hazard Mitigation Report Pursuant to Order No. 40396
CONFIDENTIALITY LOG

| Document Name/Reference | Page Number; Line Number(s) or Section Redacted | Designation | Identification | Basis of Confidentiality | Cognizable Harm |
|-------------------------|---|--------------|---|--|---|
| Exhibit A | Portions of pages 3-8 | Confidential | Redacted portions of maps showing critical infrastructure security information. | HRS § 92F-13(3) frustration exception; OIP Ltr. No. 17-02, 2016 WL 9184584 (Dec. 8, 2016); OIP Ltr. No. 07-05, 2007 WL 1267787 (Apr. 13, 2007). | <p>Public disclosure of the redacted portions of the maps indicating precise locations of utility critical infrastructure installations may increase the risk of terroristic threats or targeting. In such an event, Manele Water Resources, LLC ("Company") and its customers may be exposed to various public safety and/or national security risks, which may result in Company paying increased costs to mitigate security risks in the future thereby increasing costs for utility operations and customers.</p> <p>* The cognizable harm to Company is discussed further in Appendix A attached hereto.</p> |
| Exhibit B | Portions of pages 2-4 | Confidential | Personal identities and contact information | HRS § 92F-13(1) privacy exception; OIP Ltr No. 17-02, 2016 WL 9184584 (Dec. 8, 2016); OIP Ltr. No. 92-08, 1992 WL 437701 (July 8, 1992); OIP Ltr. No. 90-09, 1990 WL 482357 (Feb. 26, 1990). | Public disclosure of personal identities and contact information of individuals would constitute an invasion of privacy and expose certain representatives to, among other things, undue exposure of their proprietary/ commercial information and/or personal information to competitors and third parties. As a result, there is an expectation that this information will be kept private and confidential, and any disclosure of the same could expose Company to potential liability. |

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|--|--|--|--|--|---|
| | | | | | <p>* The cognizable harm to Company, its employees, and/or their affiliates is discussed further in Appendix A attached hereto.</p> |
|--|--|--|--|--|---|

APPENDIX A

Basis of Confidentiality – Narrative

Frustration Exception

The redacted portions of the maps meet the frustration exception of the Uniform Information Practices Act (“UIPA”) pursuant to HRS Chapter 92F-13(1).

Specifically, the redacted portions of the maps contain sensitive infrastructure security details, including specific locations of critical infrastructure installations. The redacted portions of the maps are held and maintained in strict confidence by Company, and are only being provided for the limited purpose of this proceeding. See OIP Ltr. No. 17-02, 2016 WL 9184584 (Dec. 8, 2016), available at <https://oip.hawaii.gov/f17-02/> (finding that local-level scaled maps showing locations of network infrastructure may be withheld under UIPA’s frustration exception to prevent compromising the security of critical telecommunication infrastructure); OIP Ltr. No. 07-05, 2007 WL 1267787 (Apr. 13, 2007), available at <https://oip.hawaii.gov/07-05/> (finding that the Department of Business, Economic Development & Tourism may withhold information about the physical security of critical energy infrastructure to mitigate the exposure risk to security hazards, such as vandalism, copper or equipment theft, or criminal activity).

Based on the foregoing opinions, Company believes that the redacted portions of the maps showing detailed locations of critical infrastructure security information meet the frustration exception under UIPA.

Privacy Exception

The redacted portions of the above-referenced responses and/or attachments meet the privacy exception of the UIPA pursuant to HRS Chapter 92F-13(1).

Specifically, the redacted portions of the responses and confidential attachments contain personal identities and contact information of Company employees and other individuals. Here, the identities and contact information are being held in strict confidence by Company, and are only being provided for the limited purpose of this proceeding. See OIP Ltr. No. 92-08, 1992 WL 437701 (July 8, 1992), available at <https://oip.hawaii.gov/92-08/> (finding that State agencies may not disclose to the U.S. Department of Veterans Affairs the name, ethnicity, and home address of each veteran who resides in the State because disclosure would constitute a clearly unwarranted invasion of personal privacy); OIP Ltr. No. 90-09, 1990 WL 482357 (Feb. 26, 1990), available at <https://oip.hawaii.gov/90-09/> (finding that the Board of Water Supply may not disclose the telephone numbers of its individual customers because disclosure would constitute a clearly unwarranted invasion of personal privacy).

Based on the foregoing opinions, Company believes that the redacted portions of the responses and confidential attachments regarding the identities and contact information of Company employees and other individuals meet the privacy exception under UIPA.

Cognizable Harm – Narrative

Frustration Exception

Public disclosure of the redacted portions of the maps showing detailed locations of critical infrastructure security information may cause substantial harm to Company and its customers by providing the public with confidential and sensitive information that exposes Company's utility infrastructure to security threats and/or criminal activity.

The confidential information: (1) has not been previously publicly disclosed or otherwise disseminated; (2) is not of the kind of information that Company would customarily disclose to the public or competitors; and (3) is of the nature that its disclosure could (a) impair the Commission's ability to obtain necessary information from similarly situated parties in the future, and (b) cause substantial harm to Company, its customers, and/or their affiliates as described above. See OIP Ltr. No. F17-02, at 14-15.

Privacy Exception

Public disclosure of the identities and contact information of Company employees and other individuals may cause substantial harm to Company, its vendors/customers, and/or their affiliates by providing the public with confidential and sensitive information that would warrant an unreasonable invasion of personal privacy, as described in further detail above.

Public disclosure of private information could expose Company to potential liability from its employees, customers, and/or their affiliates. Such misuse or unpermitted disclosure could (1) discourage other businesses or customers from making confidential disclosures to Company; (2) discourage businesses or customers from doing business with Company; (3) harm Company's relationships with existing and/or prospective businesses/customers; and (4) result in Company paying increased expenditures in the future, which would increase costs for utility operations and customers.

The confidential information: (1) has not been previously publicly disclosed or otherwise disseminated; (2) is not of the kind of information that Company would customarily disclose to the public or competitors; and (3) is of the nature that its disclosure could (a) impair the Commission's ability to obtain necessary information from similarly situated parties in the future, and (b) cause substantial harm to Company, its customers/vendors, and/or their affiliates as described above. See OIP Ltr. No. F17-02 (December 8, 2016) at 14-15.

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