

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)	
)	
PRINCEVILLE UTILITIES COMPANY,)	Docket No. 2025-0172
INC.)	
)	
For Approval of a General Rate Increase)	
and Certain Tariff Changes)	
)	

2077823.2

**PRINCEVILLE UTILITIES COMPANY, INC.'S SUBMISSION OF INFORMATION
REQUESTS TO THE DIVISION OF CONSUMER ADVOCACY**

and

CERTIFICATE OF SERVICE

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PRINCEVILLE UTILITIES COMPANY,
INC.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Application of)	
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PRINCEVILLE UTILITIES COMPANY, INC.)	Docket No. 2025-0172
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For Approval of a General Rate Increase and Certain Tariff Changes)	
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**PRINCEVILLE UTILITIES COMPANY, INC.'S SUBMISSION OF INFORMATION
REQUESTS TO DIVISION OF CONSUMER ADVOCACY**

Applicant PRINCEVILLE UTILITIES COMPANY, INC. ("PUCI" or "Applicant"), by and through its counsel, Watanabe Ing LLP, hereby respectfully submits its Submission of Information Requests to the Division of Consumer Advocacy of the Department of Commerce and Consumer Affairs (the "Consumer Advocate" or "CA") pursuant to Order No. 41863, *Approving The Parties' Stipulated Procedural Schedule And Statement of Issues Filed on August 1, 2025*, filed August 6, 2025.

DATED: Honolulu, Hawaii, October 16, 2025.

/s/ David Y. Nakashima

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Attorneys for Applicant
PRINCEVILLE UTILITIES COMPANY,
INC.

DOCKET NO. 2025-0172

PRINCEVILLE UTILITIES COMPANY, INC. ("PUCI")

SUBMISSION OF INFORMATION REQUESTS TO DIVISION OF

CONSUMER ADVOCACY PURSUANT TO ORDER NO. 41863

INSTRUCTIONS

1. For each response, the Consumer Advocate should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response at the evidentiary hearing;
2. The Consumer Advocate is requested to produce the documents and data in the form specified in the specific request, where applicable. Where no form is specified, the Consumer Advocate is requested to provide the data in either Microsoft Word format or in searchable Adobe PDF. For spreadsheets and other numerical data, Microsoft Excel should be used if possible. If the Consumer Advocate is unable to provide the data in Microsoft Word or Adobe PDF or Microsoft Excel format, explain the reasons for failing to provide in any of the above-standard forms. Documents should be organized and labeled to correspond to these data requests;
3. When an information request makes reference to specific documentation used by the Consumer Advocate to support its response, it is not intended that the response be limited to just the specific document referenced in the request. The response should include any non-privileged memoranda, internal or external studies, assumptions, or any other relevant authoritative source that the Consumer Advocate used; and

4. Should the Consumer Advocate claim that any information is not discoverable for any reason:
 - a. State all privileges and objections to disclosure;
 - b. State all facts and reasons supporting each claimed privilege and objection;
 - c. State under what conditions the Consumer Advocate is willing to permit disclosure to PUCI (e.g., protective agreement, review at business office, etc.) and
 - d. If the Consumer Advocate claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 4(a)-(c), identify each document or electronic file, or portions thereof, that the Consumer Advocate claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

CA-T-2 WATER (DANTE MUGRACE)

PUCI-CA-IR-1

Ref: CA-T-2, Page 26, Lines 7 & 8

- a. Please identify the source of the following statement: “The Company calculated a three-year historical average for 2021-2023 to set the expense for 2024.”¹
- b. Please identify each expense calculation where Mr. Mugrace used an average of expenses for 2021 to 2023 as a base for the CA’s estimate of the TY June 2025 pro forma expense.
- c. Did Mr. Mugrace confirm that the amounts shown on the Company’s operating expenses for 2024 was the actual expense for 2024 and not the average of the expenses for 2021-2023?
- d. Please provide the pro forma expense if Mr. Mugrace used the average of the expenses for 2022 to 2024.

PUCI-CA-IR-2

Ref: CA-T-2, Page 27, Line 18, Mr. Mugrace states that the test year in this proceeding is 2025.

- a. Please confirm that the test year for this proceeding is the year ended June 30, 2026 and not 2025 as stated in Mr. Mugrace’s testimony.
- b. Please identify all changes that are required as a result of the misunderstanding of the test year.

¹ See Exhibit PUCI-T-200 (Direct Testimony of Robert L. O’Brien) at page 26, lines 16-17 (“The calculation uses the actual expense for the three years 2022 to 2024 which are increased to reflect the actual Honolulu Consumer Price Index (“HCPI”) factors as shown on lines 15 and 16.”)

PUCI-CA-IR-3

Ref: CA-T-2

- a. Please identify any adjustment to the 2021 to 2023 expense average used by Mr. Mugrace in calculating the pro forma expense for the test year ended June 30, 2026 for increases in rates, charges and expenses in the four years between his average base year of 2022 and 2026.
- b. Does Mr. Mugrace believe that there have been increases in expense levels in that four year period?
- c. If the answer to PUCI-IR-4.b above is yes, please explain how the Company should adjust the historical average of the 2022 base expenses to recover those cost increases.
- d. If the answer to PUCI-IR-4.b is no, please provide supporting documentation showing that there was not any increase in the expenses making up the 2022 base expense used by Mr. Mugrace.

PUCI-CA-IR-4

Ref: CA-T-2, Page 38 to 42

- a. Please identify all cases where Mr. Mugrace has recommended that one half of expenses incurred by a company in rate cases be charged to the Company's shareholders.
- b. Please provide a copy of Mr. Mugrace's testimony supporting such a recommendation.

- c. Please identify all cases lists in response PUCI-5.a where the respective commission has adopted Mr. Mugrace's recommendations.
- d. Provide a copy of the Commission's decision adopting Mr. Mugrace's recommendations.

PUCI-CA-IR-5

Ref: Exhibit CA-201, Schedule CA-PW-104

- a. Please identify where the DM listed in the References are.
- b. If the references are incorrect, please provide corrected references.

CA-T-2 SEWER (DANTE MUGRACE)

PUCI-CA-IR-6

Ref: CA-T-2, Page 25, Lines 16 & 17.

- a. Please explain fully why Mr. Mugrace has removed the APCAC revenues from the present rates.
- b. Does Mr. Mugrace understand that the removal by the Company on Exhibit PUCI-S-6, column 2, lines 3, 5 and 7 of the APCAC revenues is not because those APCAC revenues are eliminated, but that the APCAC revenues have to be recovered in the new base rates established in the rate case?
- c. Please explain why Mr. Mugrace removed the APCAC revenues, as shown on Exhibit CA-202, Schedule CA-PS-104 but did not remove the APCAC revenues in the CA's water

presentation on Exhibit CA-201, Schedule CA-PW-104, lines 3 and 6.

PUCI-CA-IR-7

Ref: Exhibit CA 202, Schedule CA-PS-104.

- a. Please explain why Schedule CA-PS-104 shows an adjustment of \$12,304 in the Adjustment column on line 1 for Commercial Monthly Charge.
- b. If the \$12,304 in the Adjustment column should be removed, please provide updated schedule reflecting the removal of that adjustment.
- c. Please explain why the Total Operating Revenue in the Adjustment column is \$684,208 (Excel cell F24) and not the total Monthly Charges of \$1,189,716 (Excel F18) in the Adjustment column.
- d. Please confirm that the \$7,200 on Schedule CA-PS-104 (Excel cell G20) should be \$72,000.
- e. If the \$7,200 should be \$72,000, please provide the impact the change has on the CA's overall recommendation.

PUCI-CA-IR-8 **Ref: Exhibit CA 202, Schedule CA-PS-123. The interest expense in the Present Rates DCA Recommended column of \$27,952 is subtracted from the operating loss before income taxes of \$(485,939) which results in a State Taxable Income of \$(457,987).**

- a. Should the interest expense of \$27,952 have been added to the operating loss of \$(485,939)?
- b. If yes, please provide updated schedules showing the correction.
- c. If no, please explain why.

CA-T-3 (MAUREEN L. RENO)

PUCI-CA-IR-9 **Ref: Exhibit CA-301**

- a. Please provide Exhibit CA-301, Schedules MLR-1 through MLR-3 in electronic format, including all supporting data in PDF or Excel format with all links intact.

PUCI-CA-IR-10 **Ref: Exhibit CA-302**

- a. Please provide Exhibit CA-302, Schedules MLR-4 through MLR-8 in electronic format, including all supporting data in PDF or Excel format with all links intact.

PUCI-CA-IR-11 **Ref: CA-T-3 at page 6, footnote 3**

- a. Please provide a copy of the document referenced in footnote 3, page 6 of CA-T-3 Direct Testimony in its entirety: S&P Global Market Intelligence ("S&P MI"), "Water utility rate case data:

Jan. 1,2020-June 30, 2025”.

PUCI-CA-IR-12 **Ref: CA-T-3, page 15, footnote 7**

- a. Please provide a copy of the document referenced in footnote 7, page 15 of CA-T-3 in its entirety: Council of Economic Advisers, “Economic Indicators” (August 2025).

PUCI-CA-IR-13 **Ref: CA-T-2, page 16, footnote 10**

- a. Please provide a copy of the document referenced in footnote 10, page 16 of CA-T-3 in its entirety: Federal Open Market Committee, Federal Reserve Bank, “Press Release” (September 17, 2025).

PUCI-CA-IR-14 **Ref: CA-T-3, page 17, footnote 13**

- a. Please provide a copy of the document referenced in footnote 13, page 17 of CA-T-3 in its entirety: The Value Line Investment Survey, “Selection & Opinion”, Issue 8, (September 26, 2025).

PUCI-CA-IR-15 **Ref: CA-T-3, page 19, figure 1**

- a. Please provide the underlying data supporting Figure 1, page 19 of CA-T-3 in electronic format with all links intact.

PUCI-CA-IR-16

Ref: CA-T-3, page 21, figure 2

- a. Please provide the underlying data supporting Figure 2, page 21 of CA-T-3 in electronic format with all links intact.

PUCI-CA-IR-17

Ref: CA-T-3, page 24, footnote 19

- a. Please provide a copy of the document referenced in footnote 19, page 24 of CA-T-3 in its entirety: Federal Reserve Bank of Philadelphia, "Survey of Professional Forecasters: Third Quarter 2025" (August 15, 2025).

PUCI-CA-IR-18

Ref: CA-T-3, page 22, line 18

- a. Please provide the underlying data in electronic format with all links intact for the 2.27% TIPS spread noted on line 18, page 22 of CA-T-3.

PUCI-CA-IR-19

Ref: CA-T-3, page 24, footnote 24

- a. Please provide a copy of the DBET Forecasts Gradual Growth, Stronger Recovery by 2027, posted September 4, 2025 referenced in footnote 24, page 24 of CA-T-3.

PUCI-CA-IR-20

Ref: CA-T-3, page 25, footnote 25

- a. Please provide a copy of the document referenced in footnote 25, page 25 of CA-T-3 in its entirety: Value Line Investment Survey, “Water Utility” (July 4, 2025).

PUCI-CA-IR-21

Ref: CA-T-3, page 43, footnote 42

- a. Please provide a copy of the document referenced in footnote 42, page 43 of CA-T-3 in its entirety: S&P Global Market Intelligence, “RRA State Regulatory Evaluations – Energy” (July 2025).

PUCI-CA-IR-22

Ref: CA-T-3, page 46, footnote 47

- a. Please provide a copy of the document referenced in footnote 47, page 46 of CA-T-3 in its entirety: S&P MI, “RRA Regulatory Focus, FERC and Electric ROEs – 2022 Update” (September 26, 2022).

PUCI-CA-IR-23

Ref: CA-T-3, page 43, footnote 42

- a. Please provide a copy of the document referenced in footnote 48, page 46 of CA-T-3 in its entirety: J.B. Williams, The Theory of Investment Value (1938).

PUCI-CA-IR-24

Ref: CA-T-3, page 60, footnote 64

- a. Please provide a copy of the document referenced in footnote 64, page 60 of CA-T-3 in its entirety: Federal Reserve Bank of Philadelphia, Survey of Professional Forecasters: First Quarter 2025.

PUCI-CA-IR-25

Ref: CA-T-3, page 71, footnote 70

- a. Please provide a copy of the following Hawaii Public Utilities Commission orders referenced in footnote 70, page 71 of CA-T-3: Docket No. 2024-0038 and Docket No. 2024-0224.

CA-T-4 (KARL PAVLOVIC)

PUCI-CA-IR-26

Ref: CA-401.xlsx, Tab: "COSS Summary", Cell C18 and Tab: "Rate Design", Cell G41.

- a. Please confirm that Consumer Advocate's proposed sales-related revenue requirement is \$1,923,000, as presented in Tab: "COSS Summary", Cell C18.
- b. Please confirm if there is an error in Consumer Advocate's proposed rate design calculations where rates are designed to recover \$2,097,423, as presented in Tab: "Rate Design", Cell

G41, rather than the \$1,923,000. If there is no error, please explain the driver of this discrepancy.

- c. If there is an error in Consumer Advocate's rate design calculations, please provide revised workpaper CA-401.xlsx with Consumer Advocates proposed corrected rate design calculations.

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing document, together with this Certificate of Service, were duly served upon the following entities electronically to the email address shown below pursuant to HAR § 16-601-21(d), as modified by Order No. 38270 Setting Forth Public Utilities Commission Emergency Filing and Service Procedures, filed on March 14, 2022:

DEPARTMENT OF COMMERCE AND CONSUMER
AFFAIRS
DIVISION OF CONSUMER ADVOCACY
335 Merchant Street, Room 326
Honolulu, Hawaii 96813
mangelo@dcca.hawaii.gov
consumeradvocate@dcca.hawaii.gov

Via E-Mail

DATED: Honolulu, Hawaii, October 16, 2025.

/s/ David Y. Nakashima

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Attorneys for Applicant
PRINCEVILLE UTILITIES COMPANY,
INC.

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The foregoing document was electronically filed with the State of Hawaii Public Utilities Commission's Case and Document Management System (CDMS).