

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Investigation of Avista Corporation, d/b/a Avista
Utils., Puget Sound Energy, and Pacific Power & Light Co. Regarding
Prudency of Outage and Replacement Power Costs
Docket UE-190882**

**RESPONSE OF PUBLIC COUNSEL TO PACIFIC POWER & LIGHT CO.
DATA REQUEST NO. 4**

Request No: 4
Directed to: Lisa Gafken
Date Received: January 30, 2020
Date Produced: February 4, 2020
Prepared by: Avi Allison
Witnesses: Avi Allison

DATA REQUEST NO. 4.

Referring to line 4, page 11 of Exhibit AA-1CT, please specify all “sufficient measures” that the Colstrip Co-owners should have taken to “avoid an emissions exceedance in June.”

RESPONSE:

Sufficient measures to avoid an emissions exceedance in June would have included promptly conducting in-stack PM testing, fully investigating the cause of elevated PM levels, and implementing measures to reduce PM emissions. These measures would likely have included the very measures that the Colstrip co-owners ultimately implemented to bring Colstrip back into compliance with MATS by September 2019. Such measures are described in the Root Cause Analysis report conducted by Sologic and summarized in the testimony of PacifiCorp witness Charles Tack. These include [BEGIN

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