

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UE-190882

**EXHIBIT TO
TESTIMONY OF**

David C. Gomez

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PSE's Response to UTC Staff Informal Data Request No. 6

January 10, 2020

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-190324
Puget Sound Energy
Power Cost Adjustment Mechanism Annual Report**

WUTC STAFF INFORMAL DATA REQUEST NO. 006:

RE: PSE's first awareness of elevated PM levels and the use of coal from Rosebud Area A.

In PSE's response to Staff Data Request No. 2, PSE stated that:

The decision to request coal from Rosebud Area A was part of the investigative process into the 2018 MATS PM issue. During individual unit diagnostic testing just prior to the late June official site-wide MATS PM testing, the operator's personnel observed an elevation in the unofficial MATS PM level. The facility took a broad approach to the investigation of the elevated level and one of the areas they explored was the effect coal quality on the boilers.

Please state when PSE first became aware that (a) Colstrip Units 3 and/or 4 would be burning coal from Rosebud Area A; and (b) there was, as stated by PSE, "an elevation in the unofficial MATS PM level." Please indicate when and how PSE first learned about each of these items (e.g., via email, letter, meeting, report, etc.), and provide this correspondence.

Response:

Puget Sound Energy ("PSE") does not recall the exact date it first became aware that (a) Colstrip Units 3 and/or 4 would be burning coal from Rosebud Area A. Coal quality was discussed among the owners in July as Talen MT worked to identify potential causes and solutions to the elevated MATS PM levels. PSE does not have any written communication in its possession related to this issue. Colstrip co-owners were notified of the use of Area A coal during verbal discussions on the investigation of the MATS PM compliance issue.

In compliance with the Ownership and Operation agreement for Units 3&4, Talen MT, as operator, is tasked with operating the plant in a prudent utility manner and within applicable laws and regulations. Testing, including unofficial MATS PM testing, is performed by the operator as a regular operational procedure at Colstrip. Given that testing was a normal course of business, and work was ongoing to address the issue, Talen MT did not inform PSE of unofficial MATS PM tests that showed elevated levels.

Talen MT informed the owners of the PM MATS non-compliance issue on June 27, 2018, as soon as the official compliance tests showed indications of non-conformity.