

**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**

*Avista's Confidential Response to UTC Staff Data Request No. 62*

**January 10, 2020**

**COMPANY-CONFIDENTIAL PER PROTECTIVE ORDER – REDACTED  
VERSION**

**AVISTA CORP.  
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/23/2019
CASE NO.:	UE-190334 & UG-190335	WITNESS:	Thomas Dempsey
REQUESTER:	UTC Staff	RESPONDER:	Thomas Dempsey
TYPE:	Data Request	DEPT:	Gen. Prod Sub Support
REQUEST NO.:	Staff - 062	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

**REQUEST:**

**Background Section for UTC Staff Data Request No. 62, SUBPARTS A through F below**

In his response to UTC Staff Informal Data Request No. 5 (ERM), SUBPART D, Mr. Dempsey states that Avista does not recall Talen's investigation into the increase in particulate matter in Q1 2018 for the Colstrip Generation Station. He also states that Avista does not have any documentation dating back to Q1 of 2018 related to this question.

Mr. Dempsey's response to UTC Staff Informal Data Request No. 5 (ERM), SUBPART A, contains two confidential attachments: (1) Confidential Attachment A – 1 of 2; and (2) Confidential Attachment A – 2 of 2. UTC Staff Data Request No. 62, SUBPARTS A through D, refers to the following email messages contained in Attachment A:

1. Confidential Attachment A – 1 of 2, "[REDACTED]" contains an attachment titled "[REDACTED]".
2. [REDACTED] contains a single email message titled [REDACTED].
3. [REDACTED] This email message includes two additional attachments: 1) [REDACTED] and 2) [REDACTED].

In his confidential response to UTC Staff Informal Data Request No. 8 (ERM), Mr. Dempsey provides Attachment I titled "[REDACTED]".

Attachment I, above, contains the following:

[REDACTED]

[REDACTED]

[REDACTED]



In Docket UE-190324, Puget Sound Energy (PSE), in response to UTC Staff Informal Data Request No. 2 (PCA states the following regarding the decision to burn Area A coal from the Rosebud Mine:

SUBPART I: Since 2015, has Colstrip Units 3 and 4 burned any coal that was not mined from Area C of the Rosebud Mine?

**PSE Response:** Yes, in 2018 Units 3 and 4 burned coal that was not mined from Area C of the Rosebud Mine: a total of approximately 184,000 tons was purchased from Western Energy Company (“WECO”).

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. To that end, *the plant requested coal from Rosebud Area A* to see if different coal would improve the MATS PM level. The Area A coal did not bring the MATS PM level into compliance range and the facility resumed burning Area C coal through the remainder of the year. During the time the Units were out of compliance level, it made no significant difference whether Area C or Area A coal was being burned. Colstrip Units 3 and 4 burned a total of 5,974,128.92 tons of coal in 2018, the 184,000 tons of Area A coal was a small portion of that amount.

Mr. Dempsey’s response to UTC Staff Informal Data Request No. 5 (ERM), SUBPART E, Attachment B contains an email message titled; “**Colstrip Emissions Outage.msg.**” In the message string, he states: “*Units 3&4 were experiencing higher levels of particulate than normal. While they were in compliance with particulate regulations*, particulate is also used as a surrogate to estimate the levels of non-mercury metal emissions because those metals are hard to test for. Using this surrogate method they are deemed to be in non-compliance on those metals.”

Section 17 (c) of the Colstrip Unit 3 and 4 Ownership and Operating Agreement specifies that the Colstrip Project Committee shall meet regularly, but not less often than once in each calendar quarter, as may be agreed upon, and at such other times as requested by any Committee member

upon three days' written notice. It also requires the Operator [Talen] to prepare and distribute written minutes of all meetings.

**SUBPART A:** Are the Colstrip MATS Filterable Particulate Matter Quarterly Tests performed every quarter for each unit with results sent to Montana DEQ biannually, i.e. is [REDACTED] Talen's first report of the year to MDEQ encompassing Quarters 1 and 2 in 2018? If no, provide the Q1 report and when it was received by Avista.

**SUBPART B:** Provide the dates and hours that Colstrip Units 3 and 4 burned Area A coal for the purposes of investigating Q1 elevated PM levels prior to the 2018 outage and derate of Colstrip Units 3 and 4 (June 28 and June 29, 2018 respectively). Also provide the dates and hours when Colstrip Units 3 and 4 resumed burning Area C coal.

**SUBPART C:** In response to UTC Staff Informal Data Request No. 4 (ERM), SUBPART K, Mr. Dempsey provides Attachment E, which he stated contains the certificate of analysis of Area A coal used in Units 3 and 4 in 2018. The attachment is a scanned copy of a lab report where each line corresponds to an individual delivery of Area A coal starting on June 4, 2018 and culminating on June 29, 2018. Provide an explanation as to Avista's and Talen's role in procuring and burning Area A coal for the purposes of investigating the cause of elevated PM levels at Units 3 and 4 in Q1.

**SUBPART D:** Provide all minutes and any accompanying materials, presentations, emails, analysis, spreadsheets of the Colstrip Project Committee as required under Section 17 (c) of the Colstrip Ownership and Operation Agreement for the years 2017, 2018 and 2019 (through June 2019). If no Project Committee meeting minutes were created and distributed by the Colstrip Operator, explain why.

**SUBPART E:** Provide the entire message string for the email titled; "**Colstrip Emissions Outage.msg**" referred to above. In the email, is Mr. Dempsey referring to Q1? If yes, explain the inconsistency with his response to UTC Staff Informal DR No. 5 (ERM), SUBPART D.

**SUBPART F:** If, as a result of Staff's above clarification of its original request, Avista recalls Talen's investigation into the increase in particulate matters in Q1 2018, please provide a supplementary response to UTC Staff Informal Data Request No. 05 (ERM), SUBPART D and E.

## **RESPONSE**

Please see Avista's **CONFIDENTIAL** response to data request Staff\_DR\_062C. Please note that Avista's response to Staff\_DR\_062C is **Confidential per Protective Order in UTC Dockets 190222, and UE-190334 & UG-190335.**

## **SUBPART A**

Yes- the quarterly Colstrip MATS Filterable Particulate Matter tests are performed quarterly for each unit and they are submitted to MDEQ on a quarterly basis. The *CSES Units 34 2<sup>nd</sup> Qtr MATS Filterable Particulate Matter Test Report.pdf* was the second such report submitted to MDEQ in 2018. The 1<sup>st</sup> quarter report was received by Avista on March 9<sup>th</sup>, 2018. Please see the following attachment:

Staff-DR-062C Confidential Attachment A 2018 for the CSES Units 1-4 1st Qtr Particulate Compliance and PM Monitor Correlation Curve Rpt.pdf

**SUBPART B**

To the best of Avista's knowledge, Colstrip did not burn Area A coal for the purpose of evaluating elevated levels of PM in Q1.

**SUBPART C**

See response to SUBPART B

**SUBPART D**

Please see Staff-DR-062C Confidential Attachment B for the Colstrip Ownership & Operation Agreement Section 17(c) required meeting minutes from the Owners Meetings (i.e. Project Committee),

Avista is in the process of compiling additional materials from the owner meetings and will supplement this data response when such information is available.

**SUBPART E**

Please see the following attachment:

Staff-DR-062C Confidential Attachment C - Call From Billings Gazette Tom Lutey.

Mr. Dempsey is not referring to Q1 2018.

**SUBPART F**

Not Applicable