

**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 Corrected Response to UTC Staff Data Request No. 303*

**January 10, 2020**

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

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	11/25/2019
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 – 303 Corrected	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

**REQUEST:**

[REDACTED]

[REDACTED]

In its response to UTC Data Request No. 1 (UE-190458), Pacific Power stated:

Pacific Power understands the Project Committee to be the Ownership and Operating Committee, and for the time period covered by this proceeding (calendar year 2018), this committee met monthly on the 3rd Wednesday of the month.

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



**SUBPART A:** Please produce copies of any and all minutes and/or any other Documents (excluding the documents already provided and mentioned above) memorializing the Executive Ownership and Operating Committee's meetings from October 2017 to September 2018.

**SUBPART B:** Please explain why the documents pertaining to the Execute-Ownership and Operating Committee meetings from January 16, 2019 through June 19, 2019 have a section titled as "minutes."

### **CORRECTED RESPONSE (11/25/2019)**

#### **SUBPART A:**

The documents staff mentioned above constitute the minutes of the Ownership and Operating Committee meetings. These minutes document on a high level the topics that were discussed. Additional details and materials related to these topics are submitted by Talen to the owners on a periodic basis. All of these materials in Avista's possession were provided to Staff in response to DR 062.

*The Minutes are general; the periodic reports submitted by Talen are specific.* For example, in the document that Avista titled "2018 Unit 3 and 4 Executive Summaries.pdf", which was provided in the attachments to DR 062, you will find detailed breakouts of Safety, Environmental, & Unit 3/4 Performance. While the official meeting minute document, for example, has a category of "Safety"- it may only mention that Safety was discussed. The Monthly Executive Summaries, on the other hand, provide more specific safety information such as the number of recordable events year to date or the year to date Incident rate.

Likewise, the official meeting minutes may mention only that "Financial" was discussed. However during the Ownership and Operation meeting, the Avista representative may open the Budget to Actual Report spreadsheet previously received from Talen and relevant to the period in question to review and discuss the *details*.

Avista provided the following categories of documents received from Talen in response to DR 062:

- Budget to Actual Reports
- Environmental
- Exec Summary
- Fuel Reports
- Plant Performance
- Water Management Report

**SUBPART B:**

The “Minutes” section of the meeting minute documents from January 16, 2019 through June 19, 2019 is a listing of the high level topic areas discussed during the meeting. As mentioned in SUBPART A of this response, additional *detail* associated with these high level topics were provided in response to DR 062.

**ORIGINAL RESPONSE:**

- (a) Through recent conversations with Talen, the Company understands that due to first quarter particulate emissions being higher than expected, Talen made an effort to investigate those emissions even though the plant was in full compliance with MATS. Particulate is used as a surrogate for estimating emissions of non-mercury metals under MATS. If and to the extent particulate or any other regulated emissions appear to be higher than expected, TALEN investigates the circumstances as appropriate.
- (b) Through conversations with Talen, the Company understands that Talen reviewed and monitored operational parameters such as fuel, plumb bob DP, opacity, & boiler combustion in an effort to troubleshoot.
- (c) Talen was unable to identify the cause of elevated PM during the period of time referenced herein.
- (d) Avista has already provide all responsive materials in its possession; however, the co-owners have asked Talen to review their records to determine if they have additional responsive materials. Avista will supplement this response if such materials are identified and provided by Talen.

Please see Pacificorp’s Confidential response to Staff\_DR\_008C for additional information regarding the sequence of events leading up to the outage. For ease of reference we have attached it to this data response.