

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: February 4, 2020
DOCKET: UE-190882
REQUESTER: PacifiCorp

WITNESS: David C. Gomez
RESPONDER: David C. Gomez
TELEPHONE: (360) 664-1240

REQUEST NO. 10:

Does Staff contest that Mr. Tack engaged in the following actions after the elevated official Q1 test results and before the forced outage occurred?

- a. Attended meetings of the O&O Committee to discuss the elevated PM levels. Direct Testimony of Charles L. Tack, Exh. CLT-1T at 2:19-3:2.
- b. Assessed the information provided by Talen based on Mr. Tack's operational experience. Direct Testimony of Charles L. Tack, Exh. CLT-1T at 3:18-23.
- c. Had multiple additional conversations with Talen's representatives regarding the elevated PM levels. Direct Testimony of Charles L. Tack, Exh. CLT-1T at 5:11-13.
- d. Asked for more specificity regarding the actions that were being taken. Direct Testimony of Charles L. Tack, Exh. CLT-1T at 5:13-16.

RESPONSE:

Staff can only assess the actions and decisions of the Company prior to the 2018 Colstrip outage and derate as it relates to what is in the record and the Commission's prudence standard. Staff has provided testimony and exhibits which clearly answers the question above. Mr. Tack's after the fact assertions of the diligence he applied to stay abreast of the PM issue at Colstrip is not supported by any contemporaneous documentation within the record.

In order to render a recommendation to the Commission that the specific actions and decisions of a regulated utility are prudent, Staff has to be able to follow the company's decision-making process at the time those actions and decisions were made. After-the-fact narratives and recollections that rely on memory, are an unreliable source of facts and can be spun to suit a biased narrative. The fact that most of the exhibits and accompanying narratives came from Talen MT after the outage contradict Witness Wilding's assertions in his prefiled direct testimony that: "The company participates to the fullest extent of the joint-ownership agreement, including participation in on-going operations and the management committee, in which a representative from the company is present at a monthly meeting to discuss, among other items, safety, operations, environmental, finance, and to provide input for decisions related to the Colstrip plant."⁴

⁴ Wilding, Exhibit No. MGW-1T at 13:21 to 14:3.