

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST  
**COMPANY-CONFIDENTIAL PER PROTECTIVE ORDER**

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

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

**REQUEST NO. 11:**

Referring to Mr. Tack's testimony, Exh. CLT-14CCT at 4:19-51, does Staff dispute that Colstrip has achieved top quartile availability rates with Talen as the plant operator?

**RESPONSE:**

Staff is aware that Mr. Tack states the following in his testimony:

As the plant operator, Talen's history of performance has demonstrated prompt and focused attention in response to other equipment challenges at Colstrip, as demonstrated by the *top quartile availability rates* at the plant. Pacific Power reasonably believed that Talen would continue to perform consistent with prudent operational practices. (emphasis added).

Mr. Tack provides no citation for this statement in his testimony. Accordingly, Staff cannot provide a position on this statement. However, Staff is aware of the National Energy Reliability Corporation's (NERC) Generation Availability Data System (GADS), in which Talen reported the following Equivalent Availability Factor (EAF) measures for calendar years 2014–2018.

<b>Talen GADS Equivalent Availability Factor (EAF)</b>					
<b>Unit</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Colstrip 3	76.84	94.46	90.18	79.26	84.72
Colstrip 4	87.72	92.53	81.41	93.56	79.45

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**REQUEST NO. 12:**

Please refer to Mr. Gomez's testimony, Exh. DCG-1CCT at 2:1-3, stating that Mr. Gomez has 31 years of experience before joining the Commission, including in operations and engineering. Please describe Mr. Gomez's prior operations and engineering experience, including Mr. Gomez's employer(s), job title(s), dates each position was held, and responsibilities.

**RESPONSE:**

Please see Attachment A for Mr. Gomez's resume. Please also see Attachment B for a list of the Professional Certifications Attained by Mr. Gomez.