

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST  
**COMPANY-CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET UE 190882**

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

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

**REQUEST NO. 6:**



**RESPONSE:**

Staff's reference here is to the costs and downtime needed to resolve the plant's PM issues after the start of the outage. Staff has recommended that the Companies be allowed to recover these post-outage costs. As for replacement power costs, these amounts were provided by the Companies, reviewed by Staff, and were found to be reasonable. Staff did not provide a hypothetical cost of replacement power costs but notes that market power prices were lower in the period referenced in Mr. Gomez's testimony than at the time of the outage. According to the Companies, after they had all been informed at the February 21, 2018, O&O meeting that Q1 PM levels for Units 3 and 4 had a zero percent compliance margin, they decided to accept Talen MT's explanation and disregard the risks associated with assuming the Q1 official results were a "false-positive." Inserting a hypothetical amount to offset actual costs incurred as a result of the Owners' and Talen MT's mismanagement of this issue is not reasonable.