

PC Data Request 350

Re: Rebuttal Testimony of Michael Wilding, Exh. MGW-3CCT at 10.

- (a) Confirm that the summer Colstrip outage was a result of Colstrip exceeding the MATS emission standard, rather than of efforts to reduce emissions at Colstrip. If not confirmed, explain why not.
- (b) Confirm that tests to identify the source of elevated PM emission levels generally take place when generating units are operating. If not confirmed, explain why not.
- (c) Is it PacifiCorp's position that an outage of similar duration to the summer 2018 Colstrip outage would have been necessary for the Colstrip co-owners to identify and correct the elevated PM issue in spring 2018? Please explain.
- (d) What does PacifiCorp believe that an appropriate disallowance would be if the Commission determines that the Colstrip outage was the result of imprudent actions?

Response to PC Data Request 350

- (a) Yes – Colstrip Units 3 & 4 came offline following official MATS PM tests.
- (b) Yes –Please see Mr. Tack's Rebuttal Testimony at 11-12 discussing how "taking the units offline would have undermined Talen's ability to diagnose the cause of the unusually high PM test results."
- (c) It is not possible to predict the length or success of a planned outage in the spring of 2018. Please see Mr. Tack's Rebuttal Testimony at 11-12.
- (d) Pacific Power believes that the actions taken by Talen and Pacific Power were reasonable and prudent and that a disallowance is not appropriate. In the event the Commission determines a disallowance is appropriate, Pacific Power has identified some factors that should be considered by the Commission when reviewing the recommendations made by Public Counsel and Staff.