

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Dockets UE-190882  
Puget Sound Energy  
Prudency of Outage and Replacement Power Costs**

**PUBLIC COUNSEL DATA REQUEST NO. 332:**

**Re: Rebuttal Testimony of Ronald Roberts, Exh. RJR-4CCT at 6.**

- a) Confirm that the official February MATS compliance test indicated the highest Colstrip Unit 3 PM emissions rate ever reported from an official MATS compliance test to that point. If not confirmed, explain why not, and provide the date and emissions rate associated with each previous official test that showed a higher PM emissions rate.
- b) Confirm that the official February MATS compliance test indicated the highest Colstrip Unit 4 PM emissions rate ever reported from an official MATS compliance test to that point. If not confirmed, explain why not, and provide the date and emissions rate associated with each previous official test that showed a higher PM emissions rate.
- c) Explain the basis for Mr. Roberts's assertion that February 2018 official MATS PM results were "within the range of the historical variability."
- d) Provide all data and documents relied upon Mr. Roberts to conclude that the February 2018 official MATS PM results "were within the range of the historical variability."

**Response:**

- a) The official February 2018 MATS PM emissions compliance test did indicate the highest Colstrip Unit 3 PM emissions rate reported from an official MATS PM compliance test to that point. Prior to the implementation of 40 C.F.R. Part 63, Subpart UUUUU -National Emission Standards for Hazardous Air Pollutants: Coal- and Oil- Fired Electric Utility Steam Generating Units, commonly known as the federal Mercury and Air Toxics Standard (MATS), Colstrip conducted particulate matter emissions testing under an annual requirement. The annual PM testing was done using Method 5B prior to MATS. Previous particulate matter testing measured annual site wide PM emissions results in 2014 of 0.029, and 0.028 in 2016.

- b) The official February 2018 MATS PM compliance test did indicate the highest Colstrip Unit 4 PM emissions rate ever reported from an official MATS PM compliance test to that point. However, as with Unit 3 and explained above, the prior particulate matter testing used on Unit 4 in April of 2011 resulted in an annual site wide 0.031 emissions level.
- c) The statement the February 2018 official MATS PM results were “within the range of the historical variability” was based on the fluctuation of previous test results. As noted above, Colstrip has conducted particulate matter testing similar to the currently required testing since their initial commercial operation began and long before the current MATS PM testing was put in place. They have used EPA Method 5B to do PM emissions testing. The history of those tests show considerable variability. In just the period from 2004 to 2014 the results varied significantly – Unit 3 came in at .018 (05/06/09) to .035 (09/15/04) and Unit 4 at .019 (05/12/10) to .044 (06/30/04).
- d) For documentation related to the variability of Colstrip PM testing please refer to Attachment A, I-3 – I-4.