

UE-152253 / Pacific Power & Light Company  
January 20, 2016  
WUTC Data Request 14

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**REQUESTED BY: Jeremy Twitchell**  
**Subject: Bridger Selective Catalytic Reduction**

Referring to lines 7-10 on page 6 of Exhibit No. \_\_ (RTL-1C), it appears that the company assumed that the work on gas conversion would take place from January to March of each year. Please explain why the company planned to do this work in the winter months, as opposed the fall months as done with the SCR installation.

**Response to WUTC Data Request 14**

The Company's assumption that the natural gas conversion work would take place from January to March directly relates to the assumption that the environmental compliance deadline for the coal fueled unit is December 31. Therefore, for planning purposes the coal fueled unit would operate throughout that timeframe. The next schedule driver would be the need to make the converted unit available for summer capacity. With that in mind, a reasonable schedule would be to pursue gas conversion in the months immediately following the compliance deadline that forced conversion, but prior to summer peak capacity needs. Hence the selection for analysis purposes of January to March.

With respect to the selective catalytic reduction (SCR) projects, while generation economics generally favor thermal unit major maintenance outages scheduled in the spring, the SCR project implementation and tie-in schedules were primarily driven by the ongoing environmental agency regional haze rulemaking activities, construction permitting, Wyoming certificate of public convenience and necessity (CPCN) procedural schedule, voluntary Utah pre-approval procedural schedule, and timing of state-by-state integrated resource plan (IRP) review dockets; effectively pushing the tie-ins from spring to fall outage windows.

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