







For Unit 3, the results of the performance testing indicated NO<sub>x</sub> emissions ranging from 0.089 lb/MMBtu at 300 MWg to 0.131/0.134 at 800 MWg. This range of values was close to the SmartBurn guarantee. For Unit 4, the results of the performance testing indicated NO<sub>x</sub> emissions ranging from 0.104 lb/MMBtu at 300 MWg to 0.123-0.144 at 800 MWg. This range of values was close to the SmartBurn guarantee. SmartBurn was projected to reduce NO<sub>x</sub> from 0.17 to 0.125 lb/MMBtu on units 3&4. This means that a subsequent installation of an SCR would have only had to reduce from 0.125 to ~0.06 lb/MMBtu. An SCR installed by itself would have to therefore remove 50% more NO<sub>x</sub> than an SCR installed in conjunction with SmartBurn. The owners considered the reduced cost of an optimally sized, smaller SCR with reduced upfront capital costs, reduced ongoing maintenance costs, reduced chemical use, reduced chemical storage requirements, potential reduction in footprint, and a reduction in draft losses. (Draft losses contribute to reduced efficiency overall and an increase in ALL emissions per MWh as a result). The potential benefits to customers go beyond these categories, however. By installing SmartBurn early on, Colstrip was demonstrating excellent progress with respect to the Regional Haze Glide Path. Given Regional Haze rules it was reasonable to conclude that the installation of SmartBurn could, at a minimum, delay the installation requirement of an SCR further into the future than if we had chosen to do nothing at all- with a significant time value of money benefit to customers.