

**Exhibit No. EB-6C**  
**Docket No. UE-200900,**  
**UG200901, UE-**  
**200894**

**AVISTA GENERAL RATE CASE**  
**Witness: Ed Burgess**

**BEFORE THE**  
**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKETS UE-200900, UG-200901,  
UE-200894 (*Consolidated*)

**EXHIBIT EB-6C TO THE**  
**PREFILED RESPONSE TESTIMONY OF**  
**ED BURGESS**  
**ON BEHALF OF THE SIERRA CLUB**

**April 21, 2021**

**Confidential per protective order - REDACTED VERSION**

**AVISTA CORP.  
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/12/2021
CASE NO.:	UE-200900, UG-200901, UE-200894	WITNESS:	Jason R. Thackston
REQUESTER:	Sierra Club	RESPONDER:	Thomas C Dempsey
TYPE:	Data Request	DEPT:	GPSS
REQUEST NO.:	SC-004C Supplemental	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

**SUBJECT: Colstrip**

**REQUEST:**

Please provide any and all analyses conducted by Avista, Talen, or other entity (prior to installing SmartBurn) on the expected costs and benefits of installing SmartBurn on Colstrip Units 3 & 4, including:

- a. Cost of installation of SmartBurn;
- b. Operating Costs of SmartBurn;
- c. Expected savings on SCR installation cost (from size reduction);
- d. Expected savings in operating costs of SCR due to SmartBurn installation (from reducing ammonia needs); and
- e. Other expected costs and benefits.

**RESPONSE:**

- a. Please see Avista's response to Staff DR 132.
- b. Please see Avista's response to Staff DR 132
- c. Please see Avista's response to Staff DR 133. Although pricing for a reduce sized SCR was not obtained, based on the BACT analysis results (Avista is seeking permission to produce relevant information from this document), an SCR would have had to reduce approximately 50% more NOx if installed in isolation versus a scenario where it was installed in combination with SmartBurn:  $0.17-0.04=0.13$  lb/MMBtu vs  $0.125-0.04 = 0.085$  lb/MMBtu.
- d. Based on chemical rates shown in the BACT analysis, Avista estimated that SmartBurn would reduce annual chemical costs in the range of \$500,000-\$800,000 per year depending on specified SmartBurn performance.
- e. Based on catalyst costs in the BACT analysis, Avista estimated that SmartBurn would reduce such catalyst costs by approximately \$500,000 per year depending on the specified SmartBurn performance. Although the estimated combination of chemical cost savings and catalyst savings alone exceeded the expected annualized cost of SmartBurn, additional cost savings would reasonably be expected in annual maintenance, materials, and labor. Other benefits include the actual reduction in NOx emissions and the associated visibility improvements and health benefits. Please refer to the recently prepared Four Factor analysis submitted to MDEQ included as an attachment in pre-filed Thackston testimony, Exh. JRT-10 part 2.

**SUPPLEMENTAL 04/12/2021**

The response provided with SC-DR-004C Supplemental is **Confidential per Protective Order in UTC Dockets UE-200900 and UG-200901.**

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