

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation of AVISTA CORPORATION d/b/a AVISTA  
UTILITIES, PUGET SOUND ENERGY, and PACIFIC POWER LIGHT COMPANY  
Regarding Prudency of Outage and Replacement Power Costs

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DOCKET UE-190882

**AVI ALLISON ON BEHALF OF PUBLIC COUNSEL UNIT**

**EXHIBIT AA-8**

PacifiCorp Response to Public Counsel Data Request No. 316

January 10, 2020

### **PC Data Request 316**

**Refer to Direct Testimony of Charles Track, Exh. CLT-1T at 4:10-17.**

- a) Did any of the Colstrip owners perform any PM tests at Colstrip Units 3 or 4 between the official quarterly tests in February 2018 and June 2018 that followed the described official PM testing process? If so, identify the date and results (in lb/mmBtu) of each such test. If not, explain why not.
- b) Did PacifiCorp ever request that Talen perform any PM tests at Colstrip Units 3 or 4 between the official quarterly tests in February 2018 and June 2018 that followed the described official PM testing process? If so, identify the date upon which each such request was made. If not, explain why not.

### **Response to PC Data Request 316**

- a) No – As operator of the plant, Talen is the only entity authorized to perform tests at Colstrip Units 3 and 4.

The official Mercury and Air Toxic Standards (MATS) particulate matter (PM) tests were performed by Talen on the following dates:

Unit 3:

February 7, 2018  
June 21, 2018

Unit 4:

February 9, 2018  
June 26, 2018

These dates met the official quarterly MATS PM testing requirements.

Refer to the direct testimony of Charles L. Tack, Pages 4-7, regarding explanation on Talen's approach and PacifiCorp's involvement in testing relating to the elevated 2018 MATS PM results.

- b) Refer to the direct testimony of Charles L. Tack, Pages 4-7, which describes Talen's testing and trouble-shooting approach and PacifiCorp's involvement in these efforts relating to the elevated 2018 MATS PM results. PacifiCorp did not request that Talen conduct any additional PM testing. Based on discussions with Talen, PacifiCorp was assured the operator was investigating the issue.

As stated in the testimony: "On-going monitoring, operation evaluations, and extra attention are generally accepted operating practice in helping identify if the issue is real or a false positive. There are multiple components and

parameters throughout a power plant that, over the course of the year, may have random negative anomalies or outlier results. Operators monitor multiple data points (alternate indicators) to determine trends and gather as much information as available (not just single points) to understand if a specific reading represents a real or random issue.”