

**Exh. DCG-5
Dockets UE-190334, UG-190335,
and UE-190222
Witness: David C. Gomez**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**AVISTA CORPORATION, d/b/a
AVISTA UTILITIES,**

Respondent.

**DOCKETS UE-190334, UG-190335,
and UE-190222 (*Consolidated*)**

**EXHIBIT TO
TESTIMONY OF**

David C. Gomez

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Avista's response to Staff Data Request No. 1 (ERM)

October 3, 2019

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

JURISDICTION:	Washington	DATE PREPARED:	05/05/2019
DOCKET NO.:	190222	WITNESS:	Thomas Dempsey
REQUESTER:	UTC Staff	RESPONDER:	Thomas C Dempsey
TYPE:	Data Request	DEPT:	Generation Production Substation Support
REQUEST NO.:	Staff – 001	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

REQUEST:

SUBPART A: Provide all 2018 EAF calculations, on a unit level, that were used by Avista and/or generator owner to arrive at the figures for the thermal generating plants contained in Table 3 of Mr. William G. Johnson’s testimony (hereinafter Table 3), referenced above.

SUBPART B: Provide Avista’s and/or the generator operator’s 2018 GADS entries, on a unit level, for the individual plants contained in Table 3.

SUBPART C: If Avista and/or the generator operator used any method of calculation to arrive at the EAF percentages in Table 3 that is different than the method of calculation that it used to enter data into GADS, explain why.

SUBPART D: Provide the GADS-calculated unit-level EAF for the plants listed in Table 3 for the years 2014-2017.

RESPONSE:

All attachments are being provided in electronic format only.

- A. The 2018 Thermal Generation Plant Availability Factors contained in Table 3 in Mr. Johnson’s testimony did not utilize the GADS Equivalent Availability Factor (EAF) formula with the exception of Colstrip Units 3 and 4. Please see the following attachments for the data utilized to summarize the 2018 Thermal Plant Availability Factors as provided in Table 3 are based on an industry-standard availability factor calculation:

Colstrip – please see Staff_DR_001 Attachment A for the EAF calculation.

Kettle Falls – please see Staff_DR_001 Attachment D for Kettle Falls CT, and Staff_DR_001 Attachment E (Tab “Stats Summary”, cell N85) for the Kettle Falls Wood Burner. Please note that the information in Table No. 3 was related only to the Kettle Falls Wood Burner (i.e., 84.71%), the more significant generation asset at Kettle Falls. Thermal Availability Factors are based on the 2018 standard availability factor calculation.

$$\begin{aligned} 8760 \text{ (total hours)} - 96.24 \text{ (forced outage)} - 1242.79 \text{ (planned outage)} &= 7420.97 \text{ (avail. hours)} \\ 7420.97 / 8760 &= 84.71\% \end{aligned}$$

For the Kettle Falls CT, please see Staff_DR_001 Attachment D, Tab “Summary”, cell K68 which shows a 76.29% availability factor for that smaller unit.

Coyote Springs 2 - please see Staff_DR_001 Attachment F for Coyote Springs 2, Tab “Summary”, cell S20. Thermal Availability Factors are based on the 2018 standard availability factor calculation.

$$8760 \text{ (total hours)} - 888.10 \text{ (forced outage)} - 728.10 \text{ (planned outage)} = 7143.80 \text{ (avail. hours)}$$

$$7143.80 / 8760 = 81.6\% \text{ (rounded to 82\%)}$$

Lancaster – please see Staff_DR_001 Attachment C as provided for by the Plant Manager the calculation is as follows: 8283 (hours available) / 8760 (total annual hours) = 95%

- B. Please note that EAF percentages are calculated within NERC’s GADS system, and are not otherwise calculated by Avista. Avista provides the inputs (see Attachments below) for the various plants. Please see the following attachments for the inputs which were the basis for this calculation.

Staff_DR_001 Attachment A for Colstrip Units 3 and 4

Staff_DR_001 Attachment B for Coyote Springs 2 and Kettle Falls.

Staff_DR_001 Attachment C for Lancaster (as provided by Plant Operator).

- C. Per Order No. 03 in Docket No. UE-060181, the Company is required to make adjustments to its base rates if the Kettle Falls, Colstrip 3 and 4, or Coyote Springs 2 fails to meet a 70% availability factor during the ERM review period. The order does not specify the method required to calculate that metric. As such, an industry-standard reference point (standard availability factor calculation) is an easily calculated metric, with a formula not as complex as the formula utilized by GADS. It is noteworthy that regardless of which calculation was utilized – the Company was well within the established tolerance level.

- D. Please see the table below for a summary of 2014-2018 GADS entries:

Unit	2014	2015	2016	2017	2018	Comments
Colstrip 3	76.84	94.46	90.18	79.26	84.72	Provided by Talen MT
Colstrip 4	87.72	92.53	81.41	93.56	79.45	Provided by Talen MT
Lancaster	95.02	93.19	84.31	90.88	92.07	Provided by North American Energy Services
Kettle Falls	79.52	85.2	89.04	79.18	81.23	Avista- GADS Database
Coyote Springs 2	94.20	95.22	90.65	91.14	79.43	Avista- GADS Database