

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	06/21/2021
CASE NO.:	200894-900-901	WITNESS:	Jason Thackston
REQUESTER:	UTC Staff	RESPONDER:	Steve Wenke
TYPE:	Data Request	DEPT:	GPSS
REQUEST NO.:	Staff – 173	TELEPHONE:	(509) 495-4197
		EMAIL:	steve.wenke@avistacorp.com

Re: Colstrip

REQUEST:

[note: background information provided in the request is not repeated here.]

- a. Does [REDACTED] have anything to do with Westmoreland’s legal challenge of the EPA’s MATS Rule in federal court? Please also provide Westmoreland’s [REDACTED] referred to in the Project Committee Minutes.
- b. Do either of the following statements contained within in Avista’s response to UTC Staff Data Request No. 169C reference a derate?
 - [REDACTED]
 - “[REDACTED]”
- c. Please explain how Talen was able to [REDACTED], including derating. If, in fact, Talen [REDACTED], provide the corresponding NERC GADS reporting entries reflecting this state (including the period spanning the derate). If the plant [REDACTED] and no corresponding NERC GADS entries were made, explain why.
- d. Provide the 2020 U34 Plant Summary Reports prepared by the Operator and provided to the Colstrip Owners monthly. Indicate and explain the entries in the 2020 Owner Summary Event Logs for Unit 3 and Unit 4 (contained in the 2020 U34 Plant Summary Reports) which relate to [REDACTED] and [REDACTED].
- e. If Avista is in possession of any documents responsive to these requests but cannot release it because of the Joint Defense Agreement among the Colstrip Owners and/or any other restriction, list the documents and include for each, the specific privilege which bars its release.

Response:

Please see Avista’s **CONFIDENTIAL** response to data request Staff-DR-173C. Please note that Avista’s response to Staff-DR-173C is **Confidential per Protective Order in UTC Dockets UE-200900 and UG-200901**.

Avista is not privy to Westmoreland’s thinking and is not aware of if this was related to their legal challenge.

There was no written request sent to the owners regarding easing mercury limits. The comment came up in the phone conversation. This was never discussed nor considered by the owners. The

plant operator made their statement in the owners' meeting and it was recorded in the minutes. As with the phone call, this was not discussed or considered by the owners at that time.

b. The term "Dispatch" generally refers to market driven reductions in load and is not considered a derate.

The second bullet item does include a statement explaining that Talen, as the Operator, can take steps, including derating the unit if necessary, to maintain permit compliance.

c. Talen has not had to modify operations or derate the unit to maintain compliance with emission levels due to poorer quality coal. Please see the response to part d.

Per NERC Compliance requirements, all GADS events must be reported. If there were derates that were not reported, it is because they were too short in duration to qualify for a GADS record. *"If a derating is less than 2% of the unit's Net Maximum Capacity (NMC) and less than 30 minutes in duration, then report the derating at your discretion (optional). Otherwise, all other deratings shall be reported to GADS."* (refer to NERC GADS Data Reporting Instructions, Section III – Data Reporting instructions, page 12)

d. The Unit 3 and Unit 4 Plant Performance Reports are attached here:

Staff-DR-173C Confidential Attachment -1- 2020 U34 Plant Summary Reports.pdf

In the Plant Summary reports, there are three events where the plant operation was changed to maintain compliance. There were two times in March where the Unit 4 Opacity was a concern and the plant was derated. These are Unit 4 Events 24 and 26. (Event numbers are the most straight forward way to identify the entries.) Fuel quality was not the cause of these events.

There was one time in September where the Unit 3 SO₂ levels were a concern and the plant was derated. This was Unit 3 Event 52.

When the sulfur content of the fuel is viewed (also in the Plant Summary Report, on page 9 of the September 2020 report), there is no excursion in fuel quality that can be directly attributable to this event.

In short, there were three events where the operator changed the plant operation to assure compliance. None of these were related to poor quality coal.

e. Avista does not have any documents response to this request included in the Joint Defense Agreement.

Entire Document is CONFIDENTIAL per WAC 480-07-160

Staff-DR-173C Confidential Attachment 1

2020 U34 Plant Summary Report