

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	06/09/2021
CASE NO.:	200900-901-894	WITNESS:	Jason Thackston
REQUESTER:	UTC Staff	RESPONDER:	Thomas C Dempsey
TYPE:	Data Request	DEPT:	GPSS
REQUEST NO.:	Staff – 169	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

Re: Colstrip

REQUEST:

- a. Please provide the Excel workbook titled 2020 Coal Quality Analysis.xlsm, provided by Avista to Staff as an informal data request response in the Company’s Energy Recovery Mechanism (ERM) Annual Review in Docket UE-210216.
- b. Provide a similar Excel workbook, as was provided in the ERM Annual Review (referenced above), for Colstrip coal fuel deliveries for the years 2019 and 2021 (year to date). Please explain the results and trends observed.
- c. As a follow-up to Staff’s informal data request in the ERM Annual Review, Docket UE-210216, Staff requested and Avista provided the PNW Owner’s September 2, 2020 letter to Westmoreland Mining, LLC regarding their concerns over Colstrip coal fuel quality. Please provide a copy of this letter as a well as Westmoreland’s response.

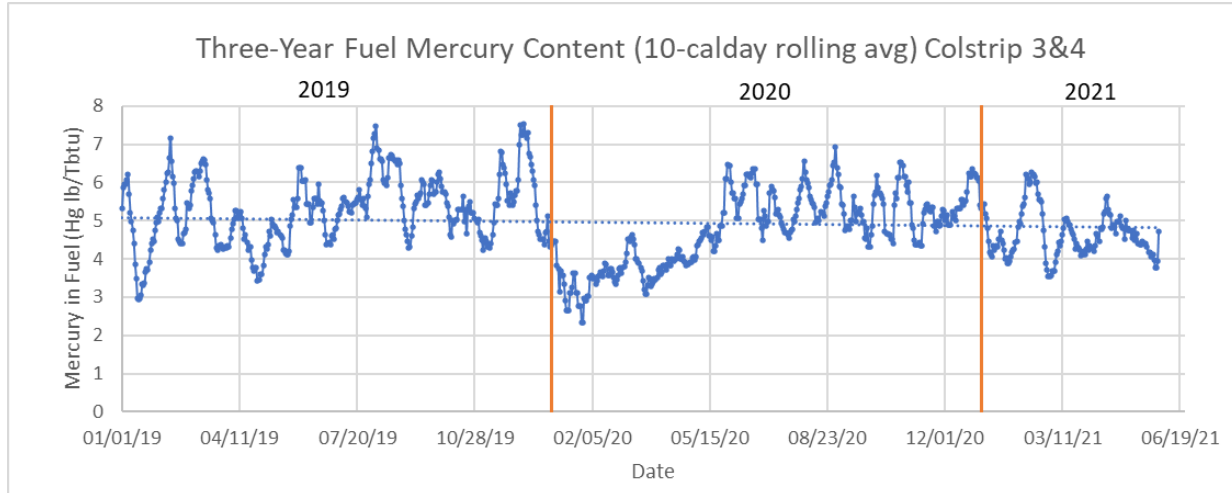
RESPONSE:

Please see Avista’s **CONFIDENTIAL** response to data request Staff-DR-169C. Please note that Avista’s response to Staff-DR-169C is **Confidential per Protective Order in UTC Dockets UE-200900 and UG-200901**.

- a. Please see attachments Staff-DR-169C Confidential Attachment A-2020 Coal Quality Analysis.xlsm, Attachment B - 2020 Coal Quality Analysis.xlsm R1 and Attachment C - 2020 Coal Quality Analysis.xlsm R2. Attachment A - 2020 Coal Quality Analysis.xlsm is the file you requested. Attachment B - 2020 Coal Quality Analysis.xlsm R1, which was sent via email to David Gomez on June 03, 2021, is exactly the same spreadsheet except that conditional formatting was added to aid Staff in interpreting data. Attachment C - 2020 Coal Quality Analysis.xlsm R2 is almost exactly the same except that Avista incorporated data from the last ten days of 2019 to correctly reflect the 10-day rolling averages for January 1st through January 9th, 2020. All versions are provided for completeness, but the R2 file (Attachment C) should have all the information you need.
- b. Please see Staff-DR-169C Confidential Attachment F-2019 Coal Quality Analysis and Attachment G-2021 Coal Quality Analysis. The results and any observed trends are discussed below.
- c. Please see Staff-DR-169C Confidential Attachment D - 20210601 Email to Annette Brandon Regarding 2020 letter to mine.pdf. This pdf includes the letter and an email addressing Western’s response as requested.

ADDITIONAL DISCUSSION

Please see below for a graph of the rolling 10-day averages for Mercury content:



- The graph reflects a slightly downward trend over the period depicted.
- Coal delivered in 2019 had the greatest number of incidents where the rolling 10-day average exceeded 6.0 lbs/TBtu- however mercury was not addressed in the contract which was in effect for that year.
- Please see Staff-DR-169 Attachment E - 20210607 Coal quality results YTD 2021. This is an email from Greg Frohn to Thomas Dempsey regarding fuel quality to date in 2021. As the email notes, the rolling 10-day Mercury averages exceeded 6.0 lbs/TBtu during the period from February 8-17th. The ownership group sent a letter addressing these deliveries. The letter is included in the attachment. The email also notes improvements subsequent to those February excursions made using on-site blending efforts.
- Avista wishes to point out that **at no point in time has Colstrip exceeded its mercury emissions limits for the plant**- even during periods where delivered coal had mercury above the 6.0 threshold. The MATS violation of 2018 related to particulate emissions used as a surrogate for NON-MERCURY metal emissions.

Entire Document is CONFIDENTIAL per WAC 480-07-160

Staff-DR-169C Confidential Attachment D
20210601 Email to Annette Brandon Regarding 2020 letter to mine

Entire Document is CONFIDENTIAL per WAC 480-07-160

Staff-DR_169C Confidential Attachment D3

RE_ [External] RE_ Colstrip Fuel Quality

Entire Document is CONFIDENTIAL per WAC 480-07-160

Staff-DR-169C Confidential Attachment E

20210607 Coal quality results YTD 2021

Entire Document is CONFIDENTIAL per WAC 480-07-160

Staff-DR-169C Confidential Attachment E1

210303 Colstrip Fuel