BEFORE THE WASHINGTON

UTILITIES & TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UG-230393

CROSS-EXAMINATION EXHIBIT OF RONALD J. ROBERTS ON BEHALF OF THE PUYALLUP TRIBE OF INDIANS

EXHIBIT RJR-__X

Excerpt of Testimony of Matthew Stobart, CB&I for PSE, PCHB No. P19-087C (Apr. 22, 2021)

October 31, 2023

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VIDEOCONFERENCE HEARING

DAY 8

Pages 1751 - 2048

OLYMPIA, WASHINGTON

April 22, 2021

8:46 a.m.

REPORTED BY: CRYSTAL R. McAULIFFE, RPR, CCR 2121

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Q. Okay. And we didn't talk about this specifically, but each waste gas case has the composition of the gases that would go to the flare in those cases; is that right?

A. That's correct, yes.

Q. Did CB&I ever communicate directly with the Agency?

A. No.

Q. Let's talk a little bit about the bypass, which you -- you showed in your -- your talk on the video that little pipe at the top of flare that you call it the diversion vent.

What -- what is the purpose of the diversion vent?

A. It's a safety device. It's -- it's there to prevent you from blocking in those headers, because basically you don't want to keep pouring gas into the flare if it is not lit. If you have a failure of the flare or a flame-out, some other type of failure like an electrical failure, then you don't have combustion going on any more in the flare. And it is dangerous to put gas in there so we don't. It diverts. A couple of valves open up at that point and the gas diverts up to the vent.

Q. Okay. So how is it actually triggered?

A. It's in the event of a failure. If the -- if the detectors on the -- on the unit no longer detect a flame, that's one form of failure. There are some other forms of failure. But if you have a shutdown of the flare, that's -- that will open up the diversion vents.

Q. Okay.

A. Or diversion vent.

Q. And so the valves to the diversion vent, are those open or closed when the flare is operating?

A. They are closed when the flare is operating normally.

Q. And what does that mean to be closed?

A. It means there's no gas going through them. There's no gas going up through the vent.

Q. Okay. And if the vents are opened, and in the case of the failure that you are just talking about, are there methods for reducing how much gas goes out of that diversion vent?

A. Yes. The operating procedures for the facility are written such that the operators have to take immediate actions of flare failure. The first thing that they do is reduce the waste gas flows from the liquefier. They may try to re-light the -- the -- the flare. If they can't get it re-lit, they will immediately shut down the liquefier. And it probably

takes a couple of minutes. They will reduce the waste gas flows within seconds. It's a couple of set-points on the -- on the -- that the operator adjusts, but yeah.

Q. Sorry. You said the process to shut down just takes a couple minutes?

A. Yes. We think the liquefier would be shut down -- if you can't get the flare re-lit, the liquefier is shut down, I would say, within five minutes. The waste gas flows are reduced to kind of a trickle within, probably, one minute. The -- the liquefier can be shut down within about five minutes. And then all of the rest of the waste gas flow rates, like the chromatograph speed loops and the -- the compressor seals that also go to the flare, those can also be shut off within ten minutes of the initial failure of the flare.

Q. Okay. And so in paragraph 47 of his pre-filed testimony, Dr. Sahu calculates emissions from a single day of emissions bypassing the flare.

Is that a situation that can occur?

A. No. That's -- that's never going to happen.

First of all, it's a gross permit violation. But no, the operating procedures instruct the operators exactly what to do, and there's no way it runs for very long through that vent.

Q. Okay. Could you just talk a little bit about

the backup systems that are in place to ensure that the flare will not go out?

A. Yes. The -- the flare is -- one of the things is the electrical system is fed from an uninterruptible power supply, which is a battery backed-up power supply. The same power supply that supplies power to all the control systems throughout the whole facility and all the security systems for the facility and the hazard detection devices, they are all battery backed up and they would never lose power.

Q. Okay. How often would the bypass be expected to be used once the facility begins normal operations?

A. I hope it never gets used. But it's a safety device, just like release valves are a safety device. They are there in case you need them. But we hope that it never gets used. It might get used over a couple times over the lifetime of the facility.

Q. So yeah, can we pull up PSE 0069. Take a look at that real quick. A little non-sequitur.

A. You are going to display it?

MR. FRANK: Yes. Mr. Holtzen, can you just scroll through this a little bit so Mr. Stobart can see it?

THE WITNESS: Yes. These are the vendor drawings from LFG. And this is basically the general