

Exh. DCG-31
Dockets UE-200900, UG-200901,
UE-200894
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-200900, UG-200901,
UE-200894 (Consolidated)**

**EXHIBIT TO
TESTIMONY OF**

David C. Gomez

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

UE-190334, Avista's Response to Sierra Club Data Request Nos. 10, 12, 13 and 14

April 21, 2021

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/08/2019
CASE NO.:	UE-190222-334/UG-190335	WITNESS:	Jason Thackston
REQUESTER:	Sierra Club	RESPONDER:	Darrell Soyars
TYPE:	Data Request	DEPT:	Environmental Compliance
REQUEST NO.:	SC 010	TELEPHONE:	(509) 495-2860
		EMAIL:	Darrell.soyars@avistacorp.com

REQUEST:

Mr. Thackston states on page 34, lines 21-23 of his direct testimony that "the combination of SmartBurn and regional plant closures place Colstrip Units 3 and 4 within the glide path and SCR is not expected to be required." Please provide any assessment prepared by, on behalf of, or for the Company assessing the importance of each of these factors in mitigating or eliminating the need for SCR technology on Colstrip Units 3 and 4.

RESPONSE:

Mr. Thackston's statements on page 34, lines 21-23 regarding environmental liability areas are in reference to expected items to be addressed in the next IRP discussed on page 32, line 20 and page 33, lines 2-8. EPA performed extensive analysis prior to the issuance of the Regional Haze Federal Implementation Plan in Sept 2012 (FIP) – see SC-DR-010 Attachment A. See also the following documents in support of the FIP: SC-DR-010 Attachment B (January 31, 2011 response by PPL Montana to US Environmental Protection Agency Region VIII's Request for Additional Reasonable Progress Information); SC-DR-010 Attachment C (Executive Summary, supplement to January 31, 2011 response); and SC-DR-010 Attachment D (Earthjustice response on behalf of Montana Environmental Information Center, Sierra Club, and National Parks Conservation Association on Regional Haze Requirements for the Colstrip-fired Power Plant).

The Montana Department of Environmental Protection (MDEQ) also completed the Regional Haze 5-year Progress Report in August 2017 (see: <http://deq.mt.gov/Air/AQ/RegionalHaze>). MDEQ is currently working on a Regional Haze State Implementation Plan (SIP) for the 2nd planning period, due July 31, 2021 and has requested a "four factor" analysis for Units 3 & 4. Talen has begun work on this analysis but based on the "factors mentioned above" in combination with recent shutdown announcement for Units 1 & 2, we expect the completed analysis to eliminate the installation of SCR from the next IRP.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/08/2019
CASE NO.:	UE-190222-334/UG-190335	WITNESS:	Jason Thackston
REQUESTER:	Sierra Club	RESPONDER:	Darrell Soyars
TYPE:	Data Request	DEPT:	Environmental Compliance
REQUEST NO.:	SC 012	TELEPHONE:	(509) 495-2860
		EMAIL:	Darrell.soyars@avistacorp.com

REQUEST:

Mr. Thackston states on page 41, lines 5-6 of his direct testimony that "Talen reviewed a wide variety of NOx control solutions over the years, including selective non-catalytic reduction (SNCR), SCR, SmartBurn and others." Please provide all analyses, presentations, memos, board minutes, and any other materials produced by, for, or on behalf of Talen or the other Colstrip owners documenting, describing, or presenting the results of these reviews.

RESPONSE:

All commercially available NOx control solutions were evaluated in the Regional Haze Federal Implementation Plan (FIP) issued in Sept. 2012. The owners' of Unit 3 & 4 became aware of the SmartBurn technology (described in Mr. Thackstons' testimony on page 39) after it was installed on Unit 2, we are not aware of any other available NOx control solution reviews.

See also Avista's response to SC-DR-010.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/08/2019
CASE NO.:	UE-190222-334/UG-190335	WITNESS:	Jason Thackston
REQUESTER:	Sierra Club	RESPONDER:	Darrell Soyars
TYPE:	Data Request	DEPT:	Environmental Compliance
REQUEST NO.:	SC 013	TELEPHONE:	(509) 495-2860
		EMAIL:	Darrell.soyars@avistacorp.com

REQUEST:

Mr. Thackston states on page 42, lines 5-7 of his direct testimony that "[t]he owners...proactively decided to install SmartBurn in an effort to manage a future regulatory obligation, doing so in a strategic and cost-effective manner." Please provide all analyses, presentations, memos, board minutes, and any other materials relating to or describing the referenced decision process.

RESPONSE:

As mentioned on page 42, lines 7-9; "SmartBurn was the last available, low cost, NOx pollution prevention emission control prior to the expected installation of a very expensive emission control (e.g., SCR)". Based on the information available to the Company at the time (see Avista's response to SC-DR-010 and SC-DR-012 and SC-DR-014), no additional detailed analysis was necessary to see the potential benefits of the SmartBurn technology and the decision to install SmartBurn.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/30/2019
CASE NO.:	UE-190222-334/UG-190335	WITNESS:	Jason Thackston
REQUESTER:	Sierra Club	RESPONDER:	Darrell Soyars
TYPE:	Data Request	DEPT:	Environmental Compliance
REQUEST NO.:	SC 014 - REVISED	TELEPHONE:	(509) 495-2860
		EMAIL:	Darrell.soyars@avistacorp.com

REQUEST:

Mr. Thackston states on page 45, lines 17-19 of his direct testimony that "Talen analyzed Regional Haze requirements and determined that a final NOx Regional Haze solution would have required both Smart Burn and a SCR." Please provide the referenced analysis and any materials or presentations provided to the Colstrip owners pursuant thereto.

RESPONSE: (REVISED 07/30/2019)

As discussed by Mr. Thackston on page 45, lines 19-23, the reasoning for this determination was as follows:

The reason for this was that Smart Burn provides the first and easiest reduction of NOx by eliminating its up-front formation. By installing Smart Burn first and obtaining the necessary operating data, it would be possible to size a SCR appropriately. Furthermore, future chemical use in a SCR (ammonia) is reduced, and the incoming NOx is lower thus reducing O&M expense.

Please also see Avista's response to SC-DR-10, 12 and 13. No other analysis was undertaken by Avista.