

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	01/31/2020
CASE NO.:	UE-190882	WITNESS:	Thomas Dempsey
REQUESTER:	Public Counsel	RESPONDER:	Thomas Dempsey
TYPE:	Data Request	DEPT:	Gen. Prod Sub Support
REQUEST NO.:	PC – 329	TELEPHONE:	(509) 495-4960
		EMAIL:	tom.dempsey@avistacorp.com

REQUEST:

Re: Rebuttal Testimony of Thomas Dempsey, Exh. TCD-1T at 16, Illustration 6.

- a) Explain why Avista views a 2018 Q1 Colstrip PM rate differential of 32 percent (23.6 – 17.9)/17.9) between PM CEMS and the official PM compliance test as indicating a “good correlation” between the results of these two tests.
- b) Refer to PacifiCorp Company Confidential, Charles L. Tack, Exh. CLT-6,

COMPANY-CONFIDENTIAL] [REDACTED]

[END COMPANY-CONFIDENTIAL].

RESPONSE:

- a) Avista bases its assessment of there being a “good correlation” between the PM CEMS and RM5 on the fact that the correlation for Q1 between the PM CEMS and RM5 was within the permit prescribed PM CAM plan tolerance requirements. With respect to the correlation between the Q1 PM CEMS and the RM5 test results, Avista does not base its assessment of there being “good correlation” between the two on a subjective evaluation of percent difference. Also, it is not appropriate to “cherry pick” a single unit to represent “good correlation”. For example, if only Unit 4 is considered, that would show **only a 3.7%** difference between the PM CEMS and RM5 results (28.8-27.8)/27.8.
- b) This subpart of the data request appears to be based on an incorrect premise. CLT-6 does not show an “acceptable PM CEMS threshold greater than 35 mg/m³”. Avista did not deem any such PM CEMS result to be acceptable. Avista is not aware of any other entity deeming any such PM CEMS result to be acceptable.

REDACTED VERSION