

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

CITY OF SPOKANE

For an Order Declaring that the City of
Spokane Waste to Energy Facility is not
“baseload electric generation” under RCW
80.80.010(4) and WAC 480-100-405(2)(a)

DOCKET UE-210247

Declaration of Chris Averyt in Support of
City of Spokane’s Reply to Staff’s and
NWEC’s Response Comments

1. I, Chris Averyt, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct.

2. As stated in my prior declaration, I am the Interim Plant Manager for the Waste to Energy (“WTE”) Facility for the City of Spokane (“City”). My responsibilities include oversight for all operational, maintenance, health, safety, environmental, financial, and administrative functions for the WTE Facility.

3. I have reviewed the comments that Commission Staff and the NW Energy Coalition (“NWEC”) submitted in this docket.

WTE Emissions and Maintenance Practices

4. The WTE Facility emissions come from the incineration of wastes, and not the turbine generator.

5. If the turbine generator goes offline, e.g., for maintenance, the WTE Facility continues to burn trash for waste disposal purposes. In other words, we consume this “fuel” regardless of whether we are generating power because the purpose of the plant is to manage waste, not to generate power.

Chris Averyt Declaration in Support of
City of Spokane’s Reply to Staff’s and NWEC’s Response Comments

WTE Facility Design Documents

6. The attached documents discuss the design of the WTE Facility and the turbine generator specifically. None of these documents identify a designed “plant capacity factor” for the generator. We are providing them in response to Staff’s comments about design documents for the generator.

7. Attached as Exhibit A is a true and correct copy of the Spokane Construction Agreement and Appendix B of that agreement.

8. Attached as Exhibit B is a true and correct copy of the Spokane Regional Waste to Energy Project Request for Proposals, dated December 17, 1986.

9. Attached as Exhibit C is a true and correct copy of the Synchronous Generator Data Sheet from the WTE Facility O&M Manual.

10. Attached as Exhibit D is a true and correct copy of the cover page and table of contents of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

11. Attached as Exhibit E is a true and correct copy of Section I of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

12. Attached as Exhibit F is a true and correct copy of Section II, Appendix A of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

13. Attached as Exhibit G is a true and correct copy of Section II, Appendix B of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

14. Attached as Exhibit H is a true and correct copy of Section II, Appendix C of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

15. Attached as Exhibit I is a true and correct copy of Section II, Exhibit A of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

16. Attached as Exhibit J is a true and correct copy of Section III, Appendix A of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

17. Attached as Exhibit K is a true and correct copy of Section III, Appendix B of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

18. Attached as Exhibit L is a true and correct copy of Section III, Exhibit B of the Spokane Regional Waste-To-Energy Project Solid Waste Permit Application, dated August 1987.

No Adverse Effects to Avista and its Ratepayers

19. Attached as Exhibit M is true and correct copy of an email that Marlene Feist, Public Works Director for the City of Spokane, received from Jason Thackston, Senior Vice President, Energy Resources at Avista, on May 14, 2021.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 14th day of May, 2021 at Spokane, Washington.



Chris Averyt
Interim Plant Manager, Waste to Energy
Facility, City of Spokane