

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST
COMPANY-CONFIDENTIAL PER PROTECTIVE ORDER

DATE PREPARED: February 4, 2020
DOCKET: UE-190882
REQUESTER: PacifiCorp

WITNESS: David C. Gomez
RESPONDER: David C. Gomez
TELEPHONE: (360) 664-1240

REQUEST NO. 11:

Referring to Mr. Tack's testimony, Exh. CLT-14CCT at 4:19-51, does Staff dispute that Colstrip has achieved top quartile availability rates with Talen as the plant operator?

RESPONSE:

Staff is aware that Mr. Tack states the following in his testimony:

As the plant operator, Talen's history of performance has demonstrated prompt and focused attention in response to other equipment challenges at Colstrip, as demonstrated by the *top quartile availability rates* at the plant. Pacific Power reasonably believed that Talen would continue to perform consistent with prudent operational practices. (emphasis added).

Mr. Tack provides no citation for this statement in his testimony. Accordingly, Staff cannot provide a position on this statement. However, Staff is aware of the National Energy Reliability Corporation's (NERC) Generation Availability Data System (GADS), in which Talen reported the following Equivalent Availability Factor (EAF) measures for calendar years 2014–2018.

Talen GADS Equivalent Availability Factor (EAF)					
Unit	2014	2015	2016	2017	2018
Colstrip 3	76.84	94.46	90.18	79.26	84.72
Colstrip 4	87.72	92.53	81.41	93.56	79.45

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REQUEST NO. 12:

Please refer to Mr. Gomez's testimony, Exh. DCG-1CCT at 2:1-3, stating that Mr. Gomez has 31 years of experience before joining the Commission, including in operations and engineering. Please describe Mr. Gomez's prior operations and engineering experience, including Mr. Gomez's employer(s), job title(s), dates each position was held, and responsibilities.

RESPONSE:

Please see Attachment A for Mr. Gomez's resume. Please also see Attachment B for a list of the Professional Certifications Attained by Mr. Gomez.