

**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 – 324CC	TELEPHONE:	(509) 495-4960
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**REQUEST:**

**SHADED INFORMATION IS DESIGNATED COMPANY-CONFIDENTIAL PER PROTECTIVE ORDER IN DOCKET UE-190882.**

**Re: Rebuttal Testimony of Thomas Dempsey, Exh. TCD-1T, at 8; Charles L. Tack, Exh. CLT-9 at 3-4 and 6-7.**

Refer to Rebuttal Testimony of Thomas Dempsey, Exh. TCD-1T, at 8. Refer also to PacifiCorp Company Confidential Exh. CLT-9, pages 3-4, [BEGIN COMPANY- CONFIDENTIAL]

[REDACTED] [END COMPANY- CONFIDENTIAL]. Refer also to PacifiCorp Company Confidential Exh. CLT-9, pages 6-7, [BEGIN COMPANY- CONFIDENTIAL] [REDACTED]

**RESPONSE:**

- a) The Company has reviewed the cited pages of Mr. Tack’s testimony. Mr. Tack does not, in the excerpts cited by Public Counsel, characterize PM CEMS as not accurately portraying PM levels in Q1 2018. Notwithstanding the foregoing, Illustration 1 and 2 below show the 2017Q4 and 2018Q1 results and correlation between PM CEMS and MATS RM5 compliance tests. The PM CEMS correlation falls within the tolerance bands for both units and for both quarters. Additionally, it can be seen in both graphs that the PM CEMS did in fact increase proportionately with the RM5 test results from 2017Q4 to 2018Q1.

Illustration 1- 2017Q4 and 2018Q1 Unit 3 RM5 Vs PM CEMS Data

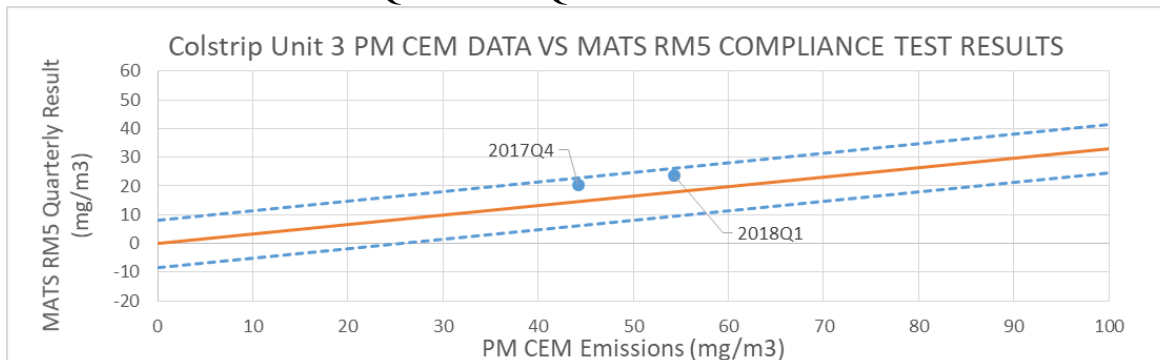
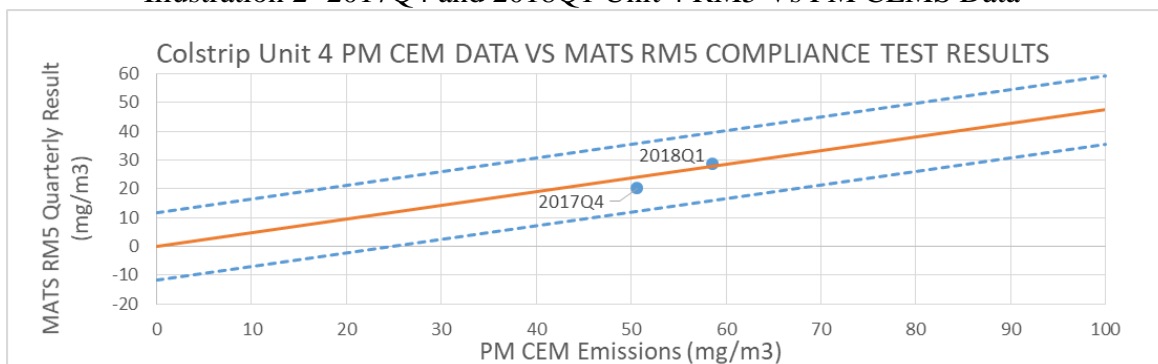


Illustration 2- 2017Q4 and 2018Q1 Unit 4 RM5 Vs PM CEMS Data



b) Mr. Tack appears to have based his statement that “alternative indicators were approximately the same” on graphs provided to him by Talen that show fluctuating data across both quarterly time periods. Avista considers this to be a reasonably accurate *visual* interpretation of the data.

Illustration 1 and Illustration 2 above show the actual numerical PM CEMS data as reported in the 2018 CSES Units 34 2nd Qtr MATS Filterable Particulate Matter Test Report. The increase in PM emissions from 2017Q4 to 2018Q1 is reflected in the PM CEMS results and the RM5 MATS test results.