

Exhibit No. ____ (JBT-16)
Docket UE-152253
Witness: Jeremy B. Twitchell

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFIC POWER & LIGHT
COMPANY,**

Respondent.

DOCKET UE-152253

**EXHIBIT TO
TESTIMONY OF**

JEFEMY B. TWITCHELL

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Company Response to Staff Data Request 7: Avoidable Maintenance
Projects in Gas Conversion Scenario*

March 17, 2016

UE-152253 / Pacific Power & Light Company
January 20, 2016
WUTC Data Request 7

WUTC Data Request 7

REQUESTED BY: Jeremy Twitchell
Subject: Bridger Selective Catalytic Reduction

Referring to lines 14-18 on page 2 and lines 12-17 on page 16 of Exhibit No. ____
(CAT-1C) please identify:

- (a) Which of these major maintenance projects could have been avoided by converting Jim Bridger to run on natural gas;
- (b) Whether the company's analysis comparing the cost of continued coal operations at Jim Bridger to the cost of gas conversion reflected any major maintenance project costs that could have been avoided by gas conversion.

Response to WUTC Data Request 7

- (a) For Jim Bridger Unit 3, the burner replacement and selective catalytic reduction (SCR) projects could have been avoided if the unit was converted to natural gas in 2015, as the natural gas conversion project scope would have included replacement of the unit's burners and would have likely allowed technology other than SCR to be applied for NO_x emissions control. For Jim Bridger Unit 4, the burner replacement, absorber reline, and SCR projects could have been avoided if the unit was converted to natural gas in 2016, as the natural gas conversion project scope would have included replacement of the unit's burners, would have likely allowed technology other than SCR to be applied for NO_x emissions control, and would have allowed the absorbers to effectively be bypassed due to limited SO₂ emissions from the unit when fueled by natural gas.
- (b) Ongoing run-rate costs, developed specifically for the continued coal operation and natural gas conversion scenarios, were included in the Company's analysis. Any differentials in these cost estimates are reflected in the present value of revenue requirement differential (PVRRd) between the continued coal operation and gas conversion scenarios.

PREPARER: Richard Goff

SPONSOR: Chad Teply