

Exhibit ___ (DN-2)
Docket UE-090205
Witness: David Nightingale

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP D/B/A PACIFIC POWER
& LIGHT COMPANY,**

Respondent.

DOCKET UE-090205

**EXHIBIT TO TESTIMONY OF
DAVID NIGHTINGALE
STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION
IN SUPPORT OF SETTLEMENT**

Issues Related to Chehalis Plant and Marengo II

September 22, 2009



STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
905 Plum Street SE, PO Box 43172 • Olympia, Washington 98504-3172

February 13, 2009

Karen M. McGaffey
Perkins Coie
1201 Third Avenue, Suite 4800
Seattle, WA 98101-3099

Re: **Certification of Compliance with the Emissions Performance Standard of
RCW 80.80.040 and WAC 463-85-130 for the Chehalis Power Plant**

Dear Ms. McGaffey,

In a letter dated January 22, 2009 you requested that the Energy Facility Site Evaluation Council (EFSEC) certify that the Chehalis Power Plant is in compliance with the greenhouse gas emissions performance standard of Revised Code of Washington (RCW) 80-80-040.

Background

Base load electrical generating facilities in operation on June 30, 2008 are presumed to be in compliance with the greenhouse gas emissions performance standard of RCW 80-80-040 until the facilities are the subject of long-term financial commitments. A change in ownership qualifies as a long-term financial commitment. The Chehalis Power Plant began operation in 2003. PacifiCorp Energy purchased the Chehalis Power Plant on September 15, 2008. RCW 80-80-040 and Washington Administrative Code (WAC) 463-85-130 currently require that applicable base load electrical generating facilities not emit greenhouse gas emissions in excess of 1,100 pounds per megawatt hour of electrical power produced.

Emissions data from calendar year 2007 (the most recent year for which an analysis has been conducted) indicate that total greenhouse gas emissions were less than 900 pounds per megawatt hour of electrical power produced. This is substantially lower than the standard.

Conclusion

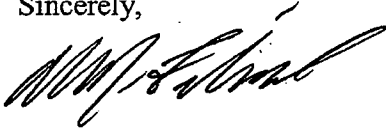
Based on information provided for calendar year 2007; the Chehalis Power Plant is currently in compliance with the greenhouse gas emission standard of RCW 80-80-040 and WAC 463-85-130. This conclusion is supported by the emissions calculations

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Ms. Karen McGaffey
February 13, 2009
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provided with your letter, and a second set of emissions calculations provided by Mr. Clint Lamoreaux of the Southwest Clean Air Agency (attached).

Sincerely,

A handwritten signature in black ink, appearing to read "Allen J. Fiksdal". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Allen J. Fiksdal

EFSEC Manager

cc: Kyle Davis - PacifiCorp
Clint Lamaroux – Southwest Clean Air Agency
Bob Burmark - Ecology

Chehalis Power

Comparison of 2007 Emissions with Greenhouse Gases Emissions Performance Standard from WAC 463-85-130(1)

Default CH₄ = 0.9 g/MMBtu IPCC and EPA's EF in GHG program (2006 inventory guidance)
Default N₂O = 2.8 g/MMBtu IPCC and EPA's EF in GHG program (2006 inventory guidance)

2007 Statistics

Heat Input = 14,034,718 MMBtu (as reported to the EPA's Acid Rain Program)

Emissions

CO₂ = 834,108.3 tons (as reported to the Acid Rain Program)
CH₄ = 13,923,638 tons (calculated from default emission factor above and heat input from Acid Rain Program)
N₂O = 43,317,986 tons (calculated from default emission factor above and heat input from Acid Rain Program)
Total GHGs = 834,165.5 tons

MW-hrs Reported by Chehalis Power

Total = 1,864,191

Performance = **894.94** lb/MW-hr based on Chehalis Power generation data