

10-035-124/Rocky Mountain Power
June 22, 2011
UAE Data Request 14.8

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With respect to RMP's Response to DPU Data Request 36.8 please provide all documents supporting or relating to PacifiCorp's claims made in the column titled "Other Compliance Issues/Concerns with Existing System Prior to Commitment?" with respect to the Huntington 1, Hunter 1 and Hunter 2 units. Among other things, please provide:

- a. An explanation as to each such unit of the date and nature of the "Commitment" referenced in the column title (i.e., explain what is meant by "Prior to Commitment" and the date and nature of the referenced "Commitment").
- b. Any internal or external studies or analyses of the referenced "Compliance Issues/Concerns."
- c. Any cost-benefit analyses or studies addressing alternatives to addressing the specified "Compliance Issues/Concerns" in a manner other than through the selected scrubber upgrades.
- d. Any documents showing or relating to the anticipated remaining life of any of the referenced waste handling systems or reagent preparation facilities at any time in the ten years prior to installation of the scrubber upgrade projects.

Response to UAE Data Request 14.8

- a. The reference to the phrase "Prior to Commitment" in the Company's response to DPU Data Request 36.8 is associated with the timeframe prior to the date the state issued the respective approval orders for each of the scrubber projects referenced, effectively establishing new emission limits via permit. The Hunter approval order was issued March 13, 2008. The Huntington 1 approval order was issued August 6, 2009. These commitments were further reinforced within the state's 2008 Regional Haze SIP.
- b. Please refer to Confidential Attachment UAE 14.8b, which is a report commissioned and performed by URS for PacifiCorp in 2003 concerning waste disposal options. This study was instituted before ground water permits were issued for the Hunter and Huntington facilities in 2005 and 2006. The ground water permits and existing landfill permits do not allow the placement of free liquids in a manner that may impact ground water. The URS study indicates that to get to a level of solids that will not contain free liquids, forced oxidation and vacuum filtration will be necessary. A solids level of only 65 to 67% is possible through continued use of the thickener/fly ash blending approach. The study does not address in detail the quantity of ash required to reach higher solids weight percentages, which as coal sulfur content increases will be not be available in sufficient quantities at normal coal ash levels.