

Rocky Mountain Power  
Docket No. 21-035-01  
Witness: Brad Richards

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Surrebuttal Testimony of Brad Richards

January 2022

1 **Q. Please state your name, business address and present position with PacifiCorp,**  
2 **dba Rocky Mountain Power (“the Company”).**

3 A. My name is Brad Richards and my business address is 1407 West North Temple, Suite  
4 210, Salt Lake City, Utah 97232. My title is Vice President, Thermal Generation.

5 **Q. Are you the same Brad Richards who submitted response testimony on behalf of**  
6 **the Company in this proceeding?**

7 A. Yes.

### 8 **PURPOSE OF TESTIMONY**

9 **Q. What is the purpose of your surrebuttal testimony?**

10 A. My surrebuttal testimony responds to the rebuttal testimony of Mr. Philip DiDomenico  
11 and Mr. Dan F. Koehler of Daymark Energy Advisors, Inc. (“Daymark”) and proposed  
12 adjustments related to two generation plant outages identified in the Energy Balancing  
13 Account (“EBA”) Audit performed on behalf of the Utah Division of Public Utilities  
14 (“DPU”). Specifically, I respond to issues raised by Mr. DiDomenico and Mr. Koehler  
15 related to the generating plant outages at Hunter Unit 3 and Gadsby Unit 2.

### 16 **HUNTER UNIT 3 OUTAGE**

17 **Q. What issues were raised by Mr. DiDomenico and Mr. Koehler regarding the**  
18 **Hunter Unit 3 to which you would like to respond?**

19 A. Mr. DiDomenico’s and Mr. Koehler’s rebuttal testimony asserts, “The lack of  
20 procedures geared toward minimizing their impact on plant operations, especially for  
21 a facility with decades of operating experience, is unacceptable and serves as a basis  
22 for a finding of imprudence.”<sup>1</sup> Their rebuttal testimony continues, “It is incumbent on

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<sup>1</sup> Rebuttal Testimony of Philip DiDomenico and Dan F. Koehler, January 4, 2022, lines 64-66.

23 the Company to ensure proper procedures are in place to cover all major contingencies  
24 let alone contingencies that are recurring in nature.”<sup>2</sup>

25 **Q. How do you respond to Daymark’s claim that the Company was imprudent due**  
26 **to a lack of procedures?**

27 A. As stated in my response testimony, the Company routinely clears slag in the boiler  
28 while the unit is online. During this event, the standard practice for clearing the slag  
29 build up was ineffective, which is believed to be a result of unidentified poor coal  
30 quality. The Company identified an opportunity to improve operating practices for a  
31 specific type of event, contrary to Daymark’s suggestion that routine procedures are  
32 not in place. In the 20 years prior to the June 28, 2020, Hunter 3 outage, one slagging  
33 event occurred resulting in a unit outage. This clearly demonstrates the Company’s  
34 established practices of clearing slag from the online unit are successful, particularly  
35 when compared to Daymark’s admission that these types of events are recurring in  
36 nature. As part of the event review, the Company determined several improvements  
37 could be made to reduce the likelihood of this rare event reoccurring. One improvement  
38 identified included a procedure for a particular type of unit slagging, which also  
39 included several improvement projects.

#### 40 GADSBY UNIT 2 OUTAGE

41 **Q. What issues were raised by Mr. DiDomenico and Mr. Koehler regarding the**  
42 **Gadsby Unit 2 outage to which you would like to respond?**

43 A. Mr. DiDomenico and Mr. Koehler summarize that, “Intentionally switching an  
44 operating unit to dependence on a backup system to perform maintenance without first

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<sup>2</sup> Ibid. lines 66-68.

45 verifying the backup system will function as designed is an imprudent practice.”<sup>3</sup>

46 **Q. How do you respond to Daymark’s claim that the Company was imprudent**  
47 **because it did not verify the functionality of a backup system?**

48 A. As Mr. DiDomenico and Mr. Koehler concede, Original Equipment Manufacturer  
49 (“OEM”) procedures are essential to the proper operation of equipment. However, it is  
50 not possible for them to cover all possible configurations and field conditions. At times  
51 local judgement needs to be factored into the process. During this abnormal  
52 maintenance event, the Company determined that isolating the vacuum tank to repair  
53 the float was necessary. To perform this non-routine task, the Company used the best  
54 available information at the time, which was the OEM procedure for operating the  
55 system on a bypass line with an in-line regulator. Identifying a system component  
56 failure (vacuum tank float), determining the best course of action for repair, and  
57 utilizing the OEM operating procedure, does not suggest a lack of local judgement or  
58 imprudence. The Company identified a gap in an established OEM procedure in review  
59 of the event and improved their own procedures.

60 **Q. Does your recommendation to the Commission change with respect to the Hunter**  
61 **Unit 3 and Gadsby Unit 2 adjustments, proposed by Daymark?**

62 A. No. In both cases it would penalize the Company for seeking to improve OEM or plant  
63 procedures.

64 **Q. Does this conclude your surrebuttal testimony?**

65 A. Yes.

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<sup>3</sup> Ibid. lines 77-79.