



Washington State Energy Facility Site Evaluation Council

AGENDA

MONTHLY MEETING
Tuesday October 20, 2020
1:30 PM

CONFERENCE CALL ONLY
Conference number: (360) 407-3810 ID: 214817

- 1. Call to OrderKathleen Drew, EFSEC Chair
- 2. Roll CallTammy Mastro, EFSEC Staff
- 3. Proposed AgendaKathleen Drew, EFSEC Chair
- 4. Minutes **Meeting Minutes**.....Kathleen Drew, EFSEC Chair
 - September 15, 2020
- 5. Projects
 - a. **Kittitas Valley Wind Project**
 - Operational Updates.....Eric Melbardis, EDP Renewables
 - b. **Wild Horse Wind Power Project**
 - Operational Updates.....Jennifer Diaz, Puget Sound Energy
 - c. **Chehalis Generation Facility**
 - Operational Updates.....Mark Miller, Chehalis Generation
 - d. **Desert Claim**
 - Project Updates.....Amy Moon, EFSEC Staff
 - e. **Columbia Solar Project**
 - Project Updates.....Ami Kidder, EFSEC Staff
 - f. **WNP – 1/4**
 - Non-Operational Updates.....Kip Whitehead, Energy Northwest
 - g. **Columbia Generating Station**
 - Operational Updates.....Kip Whitehead, Energy Northwest
 - h. **Grays Harbor Energy Center**
 - Operational Updates.....Chris Sherin, Grays Harbor Energy
 - SCA Amendment update.....Kyle Overton, EFSEC Staff
- 6. Other
 - EFSEC Manager Project Update.....Sonia Bumpus, EFSEC Staff
 - Cost allocation.....Sonia Bumpus, EFSEC Staff
- 7. Adjourn.....Kathleen Drew, EFSEC Chair

Note: "FINAL ACTION" means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

Monthly Council Meeting

EFSEC

September 15, 2020



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WASHINGTON STATE
ENERGY FACILITY SITE EVALUATION COUNCIL
Lacey, Washington
Tuesday, September 15, 2020
1:30 p.m.

Telephonic Monthly Council Meeting
Verbatim Transcript of Proceedings

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1 A P P E A R A N C E S
2 Councilmembers:
3 KATHLEEN DREW, Chair
4 KATE KELLY, Department of Commerce
5 ROB DENGEL, Department of Ecology
6 MIKE LIVINGSTON, Department of Fish and Wildlife
7 STACEY BREWSTER, Utilities and Transportation Commission

8 EFSEC STAFF:
9 SONIA BUMPUS
10 AMI KIDDER
11 AMY MOON
12 STEWART HENDERSON
13 KYLE OVERTON
14 JOAN OWENS
15 TAMMY MASTRO

16 ASSISTANT ATTORNEY GENERAL:
17 JON THOMPSON

18 ALSO IN ATTENDANCE:
19 CHRIS SHERIN, Grays Harbor Energy
20 JENNIFER DIAZ, Wild Horse Wind Facility
21 TIM MCMAHON, Stoel Rives
22 KIP WHITEHEAD, Energy Northwest
23 KAREN MCGAFFEY, Perkins Coie
24 MACKENZIE EVANS, Invenergy
25 SARAH DE GROOT, Invenergy
FRANK SARDUY, South Shore Environmental
ERIC MELBARDIS, EDP Renewables

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1 LACEY, WASHINGTON; SEPTEMBER 15, 2020
2 1:30 P.M.
3 --o0o--
4 P R O C E E D I N G S

5
6 CHAIR DREW: Good afternoon. This is
7 Kathleen Drew, Chair of the Washington State Energy
8 Facility Site Evaluation Council for our September
9 meeting.
10 And will the clerk call the roll,
11 Ms. Mastro?
12 MS. MASTRO: Good afternoon, Chair Drew,
13 Councilmembers. This -- for the record, this is Tammy
14 Mastro.
15 Department of Commerce?
16 MS. KELLY: Kate Kelly, present.
17 MS. MASTRO: Department of Ecology?
18 MR. DENGEL: Rob Dengel, present.
19 MS. MASTRO: Fish and Wildlife?
20 MR. LIVINGSTON: Mike Livingston, present.
21 MS. MASTRO: Department of Natural
22 Resources?
23 CHAIR DREW: Excused.
24 MS. MASTRO: Utilities and Transportation
25 Commission?

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1 MS. BREWSTER: Stacey Brewster, present.
2 MS. MASTRO: EFSEC Staff, Sonia Bumpus?
3 MS. BUMPUS: Sonia Bumpus, present.
4 MS. MASTRO: Ami Kidder?
5 MS. KIDDER: Present.
6 MS. MASTRO: Joan Owens?
7 MS. OWENS: Present.
8 MS. MASTRO: Amy Moon?
9 MS. MOON: Present, Tammy, thanks.
10 MS. MASTRO: Kyle Overton?
11 MR. OVERTON: Yeah, this is Kyle Overton,
12 present.
13 MS. MASTRO: Stewart Henderson?
14 MR. HENDERSON: Here.
15 MS. MASTRO: Patty Betts or AAG Jon
16 Thompson?
17 MR. THOMPSON: Yes, I am present.
18 MS. MASTRO: Thank you, Mr. Thompson.
19 Chair Drew is present and there is a quorum
20 for the regular EFSEC Council. Thank you.
21 CHAIR DREW: Thank you.
22 Is there anyone else on the line who would
23 like to introduce themselves?
24 MR. SHERIN: Chris Sherin, Grays Harbor
25 Energy Center.

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1 MS. DIAZ: Jennifer Diaz, Puget Sound
 2 Energy.
 3 MR. MELBARDIS: Eric Melbardis, EDP
 4 Renewables.
 5 MR. MCMAHON: Tim McMahon, Stoel Rives.
 6 MR. WHITEHEAD: Kip Whitehead, Energy
 7 Northwest.
 8 (Multiple speakers.)
 9 MS. EVANS: Mackenzie Evans, Invenergy.
 10 MS. MCGAFFEY: Karen McGaffey, Perkins Coie.
 11 MR. SARDUY: Frank Sarduy, South Shore
 12 Environmental.
 13 CHAIR DREW: There were a couple people from
 14 Invenergy that we may not have the correct spelling of
 15 your name, so, Mr. Sherin, will you make sure that gets
 16 to Ms. Owens and so we can make sure and have the
 17 minutes correct?
 18 MR. SHERIN: Yes, Chair Drew, I will.
 19 CHAIR DREW: Thank you.
 20 Okay. Moving on to the proposed agenda in
 21 front of you. Councilmembers, we have a proposed
 22 agenda. Is there a motion to approve the agenda?
 23 MS. KELLY: Kate Kelly, move to approve.
 24 MR. DENGEL: Second.
 25 CHAIR DREW: Thank you. I think that was

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1 Mr. Dengel for a second.
 2 MR. DENGEL: Yes.
 3 CHAIR DREW: Any discussion? All those in
 4 favor, please say aye.
 5 COUNCILMEMBERS: Aye.
 6 CHAIR DREW: Opposed? Motion carries.
 7 Moving on to the meeting minutes from
 8 August 18th, 2020. You have received them in your
 9 packets and they are presented on the screen. Is there
 10 a motion to adopt the minutes from August 18th, 2020?
 11 MR. DENGEL: Motion to approve. This is Rob
 12 Dengel.
 13 CHAIR DREW: Thank you.
 14 MS. KELLY: Second, Kate Kelly.
 15 CHAIR DREW: Okay. Thank you. It's been
 16 moved and seconded.
 17 Are there any comments or corrections on
 18 this transcript of the meeting?
 19 Hearing none, all those in favor of adopting
 20 the minutes, say aye.
 21 COUNCILMEMBERS: Aye.
 22 CHAIR DREW: Opposed? Minutes are adopted.
 23 So we will now move on to our -- the rest of
 24 our agenda. And first up is Kittitas Valley Wind Power
 25 Project, Mr. Melbardis.

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1 MR. MELBARDIS: Good afternoon, Chair Drew,
 2 EFSEC Counsel. This Eric Melbardis with EDP Renewables
 3 for the Kittitas Valley Wind Power Project. We have
 4 nothing nonroutine to report during the period.
 5 Quick update on the smoke situation by us.
 6 We're currently on work stand-downs because our -- our
 7 AQI, air quality indexes, are at times above 500.
 8 CHAIR DREW: Thank you. And I know that's
 9 also been going on for some manner of days, so difficult
 10 time.
 11 MR. MELBARDIS: Yes, thank you.
 12 CHAIR DREW: Moving on to the Wild Horse
 13 Wind Facility, Ms. Diaz?
 14 MS. DIAZ: Yes -- yes, thank you, Chair
 15 Drew, Councilmembers, and EFSEC Staff. This is Jennifer
 16 Diaz with Puget Sound Energy for the Wild Horse Wind
 17 Facility, and I have nothing nonroutine to report for
 18 the month of August.
 19 CHAIR DREW: Thank you.
 20 MS. OWENS: Looks like I'm having trouble
 21 with my documents here. Just one moment, please.
 22 CHAIR DREW: Okay. No one is speaking.
 23 Thank you for asking that question in the chat.
 24 So is -- our next item on the agenda --
 25 there you go -- is the Chehalis Generation Facility.

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1 Mr. Miller or Mr. Smith?
 2 MR. OVERTON: This is Kyle Overton, the
 3 EFSEC site specialist for the Chehalis facility.
 4 CHAIR DREW: Yes.
 5 MR. OVERTON: For the month of August, the
 6 Chehalis facility had no nonroutine items to report.
 7 CHAIR DREW: Okay. Thank you.
 8 For the Desert Claim Wind Power Project,
 9 Ms. Moon?
 10 MS. MOON: Good afternoon, Council Chair
 11 Drew and members of the Council. This is Amy Moon
 12 providing the update for the Desert Claim project, and
 13 EFSEC Staff continue to coordinate with Desert Claim;
 14 however, at this time, there are no project updates.
 15 CHAIR DREW: Thank you.
 16 Columbia Solar Project update, is that
 17 Mr. Overton or...
 18 MS. KIDDER: Chair Drew, this is Ami Kidder.
 19 I'll be providing the update for this month's Columbia
 20 Solar Project update.
 21 Good afternoon, Chair Drew and Council. For
 22 this month, the certificate holder continues to update
 23 EFSEC Staff on their progress preparing preconstruction
 24 plans for submission. Staff will update Council as
 25 things progress.

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1 CHAIR DREW: Okay. Thank you.
 2 Okay. Invenergy, Grays Harbor Energy,
 3 Mr. Sherin?
 4 MR. SHERIN: Good afternoon, Chair Drew and
 5 Councilmembers. For the month of August, I have no
 6 nonroutine items to report other than we submitted
 7 applications for some permit amendments which we will
 8 cover further. Thank you.
 9 MS. OWENS: Looks like I have to reopen the
 10 document. One moment, please.
 11 CHAIR DREW: Okay. Is this the
 12 presentation, then?
 13 MS. OWENS: Okay. We should be good now.
 14 CHAIR DREW: Okay. Are we going to start
 15 with the presentation by Mr. Sherin or the Staff
 16 presentation?
 17 MS. BUMPUS: I believe we're going to...
 18 MR. SHERIN: Yes, Chair Drew, I'll start it
 19 and then I'll hand it off to -- for the asset managers
 20 with Invenergy.
 21 CHAIR DREW: Okay. Please, go ahead.
 22 MR. SHERIN: Okay. Do you have the slides?
 23 Again, Chair Drew, Councilmembers, today we
 24 just have a brief presentation for the Council. Our
 25 application to amend our site certification agreement,

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1 SCA Amendment No. 5 and our Prevention of Significant
 2 Deterioration, PSD, Amendment 4 facilitate upgrading our
 3 combustion turbines.
 4 Next slide, please. There is just a brief
 5 overview of what we'll cover.
 6 Next slide. And then, again, I'm Chris
 7 Sherin, the plant manager. Also here at the facility I
 8 have Eric Pace, our plant engineer. Also on the call
 9 are our asset managers, Sarah de Groot, Mackenzie Evans.
 10 We also have Phil Mackey and Frank Sarduy on the call
 11 from South Shore Environmental and Karen McGaffey,
 12 our -- one of our attorneys with Perkins Coie.
 13 Next slide, please. So just I'll provide a
 14 brief overview of Grays Harbor for our -- specifically a
 15 few of our newer Councilmembers. Grays Harbor Energy,
 16 LLC is a subsidiary of Invenergy, which is one of the
 17 world's leading privately held stable energy companies.
 18 More than a hundred natural gas, wind, and solar and
 19 storage facilities.
 20 EFSEC first permitted a natural gas power
 21 plant at Satsop in 1996, which was Site Certification
 22 Agreement Amendment 2. UP Energy North America
 23 commenced construction of the facility in 2001 and
 24 subsequent -- subsequently ceased construction in 2003.
 25 Invenergy acquired the project in 2005 and resumed

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1 construction in 2007. We completed construction in 2008
 2 and been operating the facility ever since.
 3 Grays Harbor Energy Center is a 650-megawatt
 4 rated capacity two-by-one combined cycle natural gas
 5 power generation facility located in Elma, Washington,
 6 and that combined cycle unit is composed of two General
 7 Electric, GE, 7FA.03 combustion turbine generators
 8 coupled with Aalborg heat recovery steam generators and
 9 a GE D11 steam turbine generator.
 10 In 2011, the Council amended the Site
 11 Certification Agreement Amendment No. 5 to authorize
 12 construction of two more units, Units 3 and 4, to double
 13 the size of the facility. This expansion has not yet
 14 been built.
 15 Grays Harbor Energy Center is one of the
 16 most efficient natural gas facilities in the region and
 17 as such, we have been operating with greater frequency
 18 as peak demand in the region has increased.
 19 We've always had a good working relationship
 20 with EFSEC and its staff, and we're pleased to be here
 21 today to talk about what we think is a pretty simple
 22 request, to amend our Site Certification Agreement and
 23 modify the PSD Permit so that we can install the latest
 24 GE equipment to our facility.
 25 At this point, I'll hand off the

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1 presentation to Mackenzie Evans, the plant's asset
 2 manager, and she'll cover the advanced gas path upgrade
 3 and the amendment.
 4 MS. EVANS: Thanks, Chris. You can probably
 5 go to the next slide.
 6 So as Chris mentioned, Grays Harbor Energy
 7 Center has been supplying power to the Northwest Power
 8 Pool since 2008. So in framing today's conversation,
 9 it's -- it's important to understand the changing market
 10 dynamics in the Northwest Power Pool. And as you can
 11 see here detailed on this side, projected coal and hydro
 12 retirements are expected to be over 4.4 gigawatts in the
 13 next decade. On top of that, peak demand is expected to
 14 increase half a percent annually over the same time
 15 period.
 16 So together these market forces combine and
 17 contribute to the tightening reserve margins and
 18 subsequently, a projected increase in Grays Harbor's
 19 operating hours as Grays Harbor is already one of the
 20 Northwest Power Pool's most efficient, if not the most
 21 efficient, gas-fired power plant.
 22 And the last thing, you know, kind of to
 23 highlight here is just that Grays Harbor Energy does
 24 provide flexible gas power that helps with the
 25 increasing integration of intermittent renewable

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1 resources.

2 Next slide, please. So now that you have a

3 little bit more background on Grays Harbor and its role

4 in the Northwest Power Pool, we are here today outlining

5 the objectives of our recently submitted SCA and PSD

6 amendments, so our objectives are twofold. First, the

7 installation of GE's advanced gas path package and next,

8 the extension of Units 3 and 4's construction deadline.

9 So specifically we submitted some materials

10 that should be in your packet. Kind of walk through

11 those quickly. First, we have the letter requesting the

12 amendment. This letter discusses the Council's

13 regulations concerning amendments and explains how our

14 request satisfies each of those.

15 Next, we have a SEPA checklist which

16 explains why the requested amendment is not expected to

17 have any significant environmental impacts.

18 Next, is the redline of the SCA that shows

19 the specific parts of the SCA that we have asked the

20 Council to amend.

21 And lastly, the PSD minor modification

22 application.

23 So this is the detailed air permitting

24 material. And we do want to emphasize that we are not

25 asking for any changes in the PSD permit limit; however,

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1 but because the equipment would change, we do need a

2 minor modification of the PSD permit. So this

3 application obviously goes through all the regulatory

4 issues in detail and provides the technical information

5 for the EFSEC Staff and Ecology to review.

6 Next slide, please. So the first objective

7 of the amendment is installation of GE's advanced gas

8 path package, or AGP, in both units. So AGP involves an

9 upgrade to turbine software and hardware with more

10 robust parts manufactured from enhanced materials or

11 increased reliability. So if you look at the picture on

12 the slide here, the air comes in on the left side

13 through the inlet, it's compressed in the compressor

14 section, and then the gas is combusted and goes to the

15 turbine section to generate the power.

16 So the parts we're talking about here

17 looking at replacing is what's known as the hot gas path

18 section, which is just after the combustion section, so

19 these parts do see the highest temperatures. So then by

20 swapping them out, swapping the existing turbine parts

21 out with these AGP components, the turbines are able to

22 produce more output at an increased firing temperature,

23 which improves overall efficiency.

24 Next slide, please. So diving in a little

25 bit more about the upgrade. This is an upgrade that GE

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1 does all the time. Technology has been around for

2 several years. It's one of GE's most common upgrades.

3 In fact, there are other generators in the area who have

4 already upgraded their units to this technology.

5 So the upgrade is entirely interior to the

6 gas turbines. No change in the turbine footprint. And,

7 again, to be clear, we're not requesting any change that

8 limits any existing air water permits. And with that

9 said, we do want to point out that the greenhouse gas --

10 excuse me, greenhouse gas emission rate actually

11 improves with the increased efficiency from AGP.

12 In terms of timing, installation is planned

13 for spring of 2021 as a part of the facility's regularly

14 scheduled annual maintenance outage. So with the units

15 already on outage, no additional downtime is required

16 for installation. And kind of walking back from there,

17 in order to meet that timeline, we did submit the

18 material in August and we're here talking to the Council

19 today in September so that we can get approval before

20 the end of the year to buy the equipment and be good to

21 go for next spring.

22 Next slide, please. So to close the loop

23 here, the chart on this slide details Grays Harbor's

24 projected operations through 2029. We wanted to show

25 this to be clear that the demand for efficient natural

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1 gas-fired power is going to increase over the next

2 several years with the retirements discussed earlier.

3 So we expect the plan to run more often even if the

4 equipment is not changed. So the modest increase in

5 capacity from AGP means that Grays Harbor Energy Center

6 can provide a bit more power to meet this increasing

7 demand. And the improvement and efficiency means that

8 the facility may also run a little bit more often

9 because as we know, gas generation in the region is

10 dispatch -- dispatched based on efficiency. So of

11 course, you know, if Grays Harbor is running instead of

12 less efficient generation, it means less gas is consumed

13 and fewer greenhouse gases are emitted overall in order

14 to meet the regional load.

15 Next slide, please. Moving on to the second

16 objective of the amendments, the extension of the

17 construction deadlines for Units 3 and 4. So the

18 Council and the governor have already approved the

19 addition of two more combustion turbine units at the

20 facility as Chris noted. The SCA currently requires

21 construction of these units to begin by 2021. We would

22 like to extend that to 2028, which we think better lines

23 up with the need for generation in the region resulting

24 from the expected retirements.

25 So the SCA already requires us to make

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1 detailed filings throughout the environmental
 2 requirements in effect at the time we proposed to
 3 initiate construction, and it also requires us to get
 4 the Council's approval before we begin. So those
 5 requirements would of course continue to be in effect,
 6 and so the Council would have a chance -- a chance to
 7 look at those issues in detail before authorizing
 8 construction to proceed.

9 Next slide, please. And that brings us to
 10 the end of the presentation we had prepared. On behalf
 11 of the team, we really do appreciate your time fitting
 12 us on the schedule today, and with that said, I'd like
 13 to open it up for any questions.

14 CHAIR DREW: Thank you very much.
 15 Now we will move on to Staff. Ms. Bumpus,
 16 do you have questions or would you like to go ahead and
 17 make your comments?

18 MS. BUMPUS: Thank you, Chair Drew. Good
 19 afternoon, Councilmembers. No questions. I can go
 20 ahead and proceed with the presentation if that's okay
 21 with the Council?

22 CHAIR DREW: Yes, and then we'll come back
 23 because I do have a couple of questions about the
 24 presentation, but why don't you go ahead because I think
 25 you're going to talk about our process here.

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1 MS. BUMPUS: Yes. Okay, great.
 2 So, again, for the record, this is Sonia
 3 Bumpus, and I am going to talk about EFSEC's SCA
 4 amendment process. Going to just kind of provide a high
 5 level overview of -- of how the process works, and
 6 afterwards, I'd like to make some recommendations for
 7 the Council to consider with respect to next steps for
 8 this SCA amendment that's been proposed.

9 So the procedures concerning an amendment
 10 request for a site certification agreement are outlined
 11 in EFSEC's WAC, Washington Administrative Code, 463-66.
 12 The Council when acting on the site certification
 13 agreement amendment request can accept, reject, or
 14 reject the request with conditions. This is in
 15 463-66-060.

16 So now that we have a written request for an
 17 SCA amendment, we look to WAC 463-66-030. This requires
 18 the Council to hold one or more public hearing sessions
 19 at the times and places determined appropriate by the
 20 Council. And so this is where Staff at the end of this
 21 overview will make a recommendation. But essentially,
 22 the Council can decide as they go along if they need
 23 additional information and if they want to conduct
 24 additional public hearing sessions on the amendment
 25 request.

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1 The public hearings, specifically the first
 2 public hearing, historically includes a presentation by
 3 the certificate holder about the amendment they're
 4 requesting, and it also provides an opportunity for
 5 public comment on the amendment request before the
 6 Council. So you could imagine that once we've had the
 7 opportunity of public comment and we've received public
 8 input, that helps move the process along particularly
 9 with respect to the SEPA process which EFSEC conducts
 10 under our promulgation of SEPA WAC in 463-47.

11 So EFSEC SEPA-responsible official, which is
 12 the EFSEC manager, would review the amendment
 13 documentation re- -- which is what we've already begun
 14 to do, would request additional information if -- if
 15 needed to complete the review, the environmental review,
 16 and would then make a SEPA determination with respect to
 17 the environmental impact associated with the amendment
 18 request and would report that to the Council in a public
 19 meeting.

20 And at that point, the Council then can
 21 proceed with review of the SCA amendment request, which
 22 is outlined in WAC 463-66-040, and I've encouraged the
 23 Council to take a look at these four provisions, and I'm
 24 just going to highlight them really quickly.
 25 Number one is the intention of the original

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1 SCA. So you're looking at whether the proposal is
 2 consistent with the intent of the original SCA.

3 Two is, is it consistent with applicable
 4 laws and rules.

5 Three, consistent with public health safety
 6 and welfare.

7 And four, the provisions of Chapter 463-72.
 8 And so there's sort of an outline of -- of
 9 how the Council approaches the review of -- of the
 10 amendment.

11 For the Council to approve the SCA amendment
 12 request, there are two paths on which the Council can
 13 proceed. One is to approve the Council -- or to approve
 14 the amendment request by resolution, and this is in
 15 463-66-070. There's a second option for approval, but
 16 it applies only if certain criteria are met. This is in
 17 463-66-080 and this requires approval by the governor.

18 So I'm -- and I can answer questions about
 19 this. It's a lot of information. So I'm just trying to
 20 sort of touch on the highlights, but I wanted to let the
 21 Council know that it -- historically what we've done is
 22 once public hearings have been conducted, SEPA -- a SEPA
 23 determination has been made, the Council is reviewing
 24 the SCA amendment request in light of those four
 25 provisions, consistency with those four provisions that

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1 I just outlined.
 2 Typically around that time is when Staff
 3 would make a recommendation to the Council on a path
 4 forward whether, you know, we would recommend that the
 5 Council proceed by approval of -- you know, through
 6 resolution or would it be triggering those criteria in
 7 463 -- 463-66-080 requiring approval by the governor.
 8 So I'm not going to make a recommendation
 9 with respect to that at this time, but I wanted to let
 10 the Council know about those two paths for approval down
 11 the road.
 12 So that's -- that's the overview of our
 13 process, and I'm going to stop here before I get into
 14 what I would recommend as next steps to see if the
 15 Council have any questions about any of these rules that
 16 I've just gone through.
 17 CHAIR DREW: So what I'd like to do perhaps
 18 is to ask questions -- let's see, I -- I think I still
 19 have some questions on the information and -- that was
 20 provided to us by Grays Harbor Energy and Invenergy, and
 21 so why don't we start with those questions. I know this
 22 is a lot coming at the Council right now and I'm sure
 23 that, Sonia, you will also share those citations in an
 24 email so people don't have to write them down. And then
 25 we'll take questions on the process and then we'll talk

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1 about next steps.
 2 So I will, if we can, go back to a couple
 3 questions about the information from Invenergy and Grays
 4 Harbor Energy. Mr. Sherin, I don't know how you want to
 5 handle that in terms of responses, but I have -- first
 6 of all, my question as we went through the items
 7 provided the SEP- -- SEPA checklist as I reviewed it
 8 only applies to the advanced gas path and not to the
 9 construction extension; is that correct?
 10 MR. SHERIN: Yes, Chair Drew, that's
 11 correct.
 12 MS. MCGAFFEY: Excuse me, Chair Drew, this
 13 is Karen McGaffey. The checklist actually applies to
 14 both. I think from our view, the actual immediate
 15 effects of the amendment all relate to the advanced gas
 16 package. There wouldn't be any environmental effects
 17 from a -- the extension by itself. The Council's
 18 subsequent decision when Grays Harbor requests
 19 authorization to begin construction would clearly
 20 require some consideration by the council of
 21 environmental issues at that point. But I think that
 22 extension by itself does not have additional
 23 environmental impacts and that's why you don't see a
 24 bunch of things discussed in the checklist.
 25 CHAIR DREW: Okay. I understand that. And

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1 so the -- I'll -- I'll skip to a different question I
 2 have which is along those same lines. So the current
 3 Amendment 5 allows for construction of two-by-one
 4 combined cycle turbine and steam turbines the same as is
 5 currently used in Units 1 and 2; is that correct?
 6 MR. SHERIN: Yes, that's correct.
 7 CHAIR DREW: So would you imagine putting in
 8 those exact same units?
 9 MR. SHERIN: I wouldn't imagine it would put
 10 in the exact same units, but I wouldn't rule it out
 11 either. I think this is what Ms. McGaffey was implying
 12 is that if we -- when we -- if we were to build Units 3
 13 and 4, then we would have -- pretty -- we'd pretty much
 14 have to go through another amendment and the whole
 15 process for those two units.
 16 CHAIR DREW: Okay. So that -- that was
 17 actually the point I was getting to I -- is that, and so
 18 I think that we should lay that out here that if there
 19 are changes to what was approved in the Amendment 5 for
 20 the facility for the Units 3 and 4, then we would have
 21 to do another amendment, which would have its own SEPA
 22 checklist with it?
 23 MR. SHERIN: Yes, that would be correct.
 24 CHAIR DREW: Okay. So another question I
 25 have is -- and -- and this may be something that you

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1 want to get back to us on. I'm -- followed the chart a
 2 little bit in terms of, I mean, I saw the lines go up in
 3 terms of current capacity and with -- and this is with
 4 the advanced gas path, so let me clarify that. And then
 5 the additional capacity provided by that but also a
 6 forecast that's rather substantially increased in terms
 7 of the actual sold generation power from the facility.
 8 Excuse me if I'm not using the right term there. And
 9 that's confusing to me how that forecast was developed
 10 because it looks very divergent from the history of the
 11 facility.
 12 MS. EVANS: I can maybe take a first stab --
 13 stab at this one. So with the impact of the retirements
 14 expected in the region as -- as we kind of walked
 15 through that that creates a larger need for a gas-fired
 16 power -- power generation. So that was kind of what
 17 we're seeing in the market is that we expect to be
 18 operating more than we have historically with that --
 19 with or without the AGP installation based on changing
 20 market forces and we foresee a need for more power
 21 generation.
 22 CHAIR DREW: So is that an internal, then,
 23 forecast as opposed to an external forecast?
 24 MS. EVANS: I believe so, yes. We -- we do
 25 have a, you know, commercial modeling team.

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1 CHAIR DREW: Okay. Yeah, I'd be -- I'd be
 2 interested in -- in more detail because it's quite
 3 substantially different, and so I'm -- I'm interested in
 4 more information along those lines.
 5 MR. SHERIN: Chair Drew, I'll also add that
 6 even from 2015 on, basically our total megawatt hours
 7 produced in a year has increased. 2018 it dropped off,
 8 but that was because of the -- essentially we didn't run
 9 for that last month and three-quarters -- we didn't run
 10 for a month and three-quarters because of the pipeline
 11 explosion up in British Columbia. We were on pace to
 12 have a -- potentially have a record-setting year in 2018
 13 for total megawatt hours produced, and then last year in
 14 2019 we did actually have a record-setting year for the
 15 plant's total capacity.
 16 CHAIR DREW: And then --
 17 MR. SHERIN: Megawatt hours produced over
 18 the course of the year and that -- that trend we expect
 19 to continue.
 20 CHAIR DREW: And this year was a little odd
 21 too.
 22 MR. SHERIN: Yes, we had a -- this year that
 23 will not be the case. This year due to COVID demands
 24 down, it's been a challenging year and we also had a
 25 forced outage for three and a half months on one of the

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1 turbines. So we physically -- with that occurring, we
 2 physically -- this year we physically couldn't produce
 3 more than in the past.
 4 CHAIR DREW: Okay. Well, it would be -- it
 5 would be, I think, helpful to the Council to have some
 6 view of the recent past and -- and the considerations in
 7 the forecast in the future. Thank you.
 8 Let's see, then my last question at this
 9 point is, so in terms of the construction extension, why
 10 2028, why seven years?
 11 MS. EVANS: Sarah, you want to take that
 12 one?
 13 MS. DE GROOT: Sure, I would be happy to.
 14 So I -- you know, our thought was to kind of keep this
 15 in line with when we're seeing coal retirements and, you
 16 know, assuming -- or -- or knowing that it would take a
 17 couple years for construction to -- to account for that
 18 as well. So that timeline is -- is aligned with -- with
 19 the coal retirements in the area.
 20 CHAIR DREW: Okay.
 21 MS. DE GROOT: And when there would be a
 22 potential need for additional capacity.
 23 CHAIR DREW: Thank you.
 24 I saw in the chat that -- that Mr. Dengel
 25 has some questions?

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1 MR. DENGEL: Yes, I think they may have just
 2 answered one of them. So it sounds like you mentioned
 3 in the supporting materials that the market conditions
 4 then currently support the construction; however, it may
 5 support it in 2028. Is that what you're referring to
 6 with the -- with the phase-out creating that additional
 7 demand, is that the market conditions that would
 8 facilitate the need for this construction or are there
 9 other factors that would also heavily weigh in and make
 10 this more tentative?
 11 MS. DE GROOT: Yeah, great question. That
 12 is the primary driver. I think there is an increase
 13 in -- we're seeing an increase in peak demand as well,
 14 but the -- the main driving factor would be coal
 15 retirements.
 16 MR. DENGEL: I have one other question
 17 regarding the emissions. I don't know if you have this
 18 information available, but looking at the -- kind of
 19 your -- your operation as a whole, with the -- with the
 20 gas pathway, it does sound like there'll be an increase
 21 in emissions to the facility as a whole but a decrease
 22 in the -- in the pollution per kilowatt hour.
 23 Overall to your system, because you're
 24 phasing out some coal plants but you're also phasing out
 25 hydro as well, where does your kind of overall emissions

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1 land as a result of making this change? Is it an -- is
 2 it an increase, decrease or is it all negligible?
 3 MR. SARDUY: I can field that one. This is
 4 Frank Sarduy with South Shore Environmental. The data
 5 that GE has provided has -- has shown that for all of
 6 the pollutants that -- for which the facility has permit
 7 limits and does not have a control, all of those
 8 emissions will stay the same or go down on a pounds per
 9 MBtu basis.
 10 The -- there -- as far as knots in CO goes,
 11 any -- any increases would be able to be addressed by
 12 the plant's emission control systems by the SCR and the
 13 oxidation catalyst, so we wouldn't expect to see
 14 increases in those. And as part of the application,
 15 there were no requests for increased permit limits so
 16 they can live with the -- with the -- with the permit as
 17 written.
 18 MR. DENGEL: Okay. So I -- I get the
 19 immediate facility. I mean -- and I appreciate you
 20 providing that additional recap and clarity. I'm just
 21 wondering with the retirements going on and the
 22 increased capacity, overall looking at what those other
 23 emissions were on those retirements and going to this,
 24 I'm just wondering emission-wise is it resolving in an
 25 increase, decrease, or is it -- is it tough to tell;

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1 does that make sense?
 2 MR. SARDUY: I -- I gotcha. The -- I -- I
 3 don't have that -- that information with me. I know
 4 that there are some coal retirements, so obviously
 5 there's -- there's going to be a great improvement there
 6 when -- when those units are retired. But I -- I don't
 7 have a percentage number that I could give you on -- on
 8 what the net change would be.
 9 MR. DENGEL: Thank you. That's all the
 10 questions that I had. Appreciate it.
 11 CHAIR DREW: Okay. Thank you.
 12 Are there other questions from
 13 Councilmembers?
 14 Okay. Hearing none, are there questions
 15 about the process as you heard outlined by EFSEC
 16 manager, Sonia Bumpus?
 17 MS. KELLY: Chair Drew, this is Kate Kelly.
 18 CHAIR DREW: Yes, go ahead.
 19 MS. KELLY: I -- I guess that -- to
 20 understand the process going forward, the -- the
 21 application materials that we have are a little thin on
 22 the extension of time for the 3 and 4, and there's just
 23 not a lot of substance in there. Are -- so I'm -- I'm
 24 just trying to understand are we going to receive more
 25 material about it so that we can better understand the

1 my take -- my understanding is that if you were to grant
 2 this permit extension, if there was to be any change in
 3 the proposed -- because there was a prior EFSEC decision
 4 for the engines themselves, if there was any change as
 5 far as what those engines look like outside of the
 6 current proposal, it would have to come back for a later
 7 amendment; is -- is that correct?
 8 CHAIR DREW: That's correct.
 9 MR. DENGEL: Okay. Thank you.
 10 CHAIR DREW: So, Ms. Bumpus, if you want to
 11 proceed with the next steps.
 12 MS. BUMPUS: Thank you, Chair Drew. Yes, so
 13 as I was saying, there are -- there's a first public
 14 hearing that the Council is required to hold and of
 15 course additional public hearing sessions can be held.
 16 So to start, Staff would like to recommend that the
 17 Council conduct a public hearing session on Invenergy's
 18 SCA Amendment request on October 6th and that that
 19 public hearing session be conducted virtually as we've
 20 been holding our Council meetings, our monthly Council
 21 meetings, and we provide a presentation, or rather the
 22 certificate holder would provide a presentation. We
 23 could, of course, provide some additional information to
 24 the Council and public. And another portion of the
 25 meeting would be for public comment, and we would do

1 implications of what's being asked and what happens if
 2 this doesn't get approved?
 3 And to tack onto that, I -- I got a --
 4 particularly reading the existing site certificate, it
 5 was a little confusing about what the current
 6 requirements are and there was five years and there was
 7 ten years and just understanding what the implications
 8 are for -- for the site amendment permits that are on
 9 it.
 10 CHAIR DREW: I think that what we will do as
 11 Councilmembers is share some of the questions that we
 12 want for additional information with our Staff, and they
 13 will then provide that in a data request to the Grays
 14 Harbor Energy for additional information. And we can
 15 also ask additional questions at the public hearing
 16 coming up. So I think those are both two methods where
 17 we can make sure that we understand the specific
 18 information and the context. And I agree with you, it
 19 is quite thin on the construction timeline extension in
 20 terms of information.
 21 MS. KELLY: Thank you.
 22 CHAIR DREW: Are there questions about the
 23 process from Councilmembers?
 24 MR. DENGEL: So just one clarification on
 25 the -- on the time extension and the engines. So my --

1 this virtually.
 2 The -- the time for the meeting that we are
 3 thinking would be best is to start the meeting at 4:00
 4 p.m. and go to 6:00 p.m. We also have a public comment
 5 database that we would activate on EFSEC's website
 6 during that day so that those who could not call into
 7 the meeting or attend on the platform in which we're
 8 hosting it would -- would be able to submit -- they
 9 could also mail it in, but submit an electronic comment
 10 to EFSEC.
 11 CHAIR DREW: So just to --
 12 MS. BUMPUS: There are --
 13 CHAIR DREW: I'm -- I'm sorry, on that point
 14 can we clarify? I heard you say that we would activate
 15 the comment database on that day, but we would give
 16 people more than that day to comment I would assume?
 17 MS. BUMPUS: Well, we will notice the -- the
 18 public hearing session to the public if the Council's
 19 agreeable to what we're proposing, this proposed
 20 schedule. We would notice that likely this week, and
 21 the public is -- is free to submit, you know, comments
 22 to us now. The -- Chair Drew, are you wanting to know
 23 if we could activate our comment database for basically
 24 from the beginning of the notification until the
 25 meeting?

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1 CHAIR DREW: I think that would be helpful,
 2 because if we want to have all the comments collected by
 3 the meeting date, then that gives people different
 4 opportunities of time to comment rather than extending
 5 it beyond hearing that date. Because I -- I understand
 6 they can send them in writing too, but it's much easier
 7 perhaps for a lot of people to enter a comment in a
 8 database. So just a question on that.
 9 MS. BUMPUS: Yeah, so I -- I think that
 10 that -- that would be fine. We can certainly activate
 11 the comment database at the same time as the public
 12 notice goes out and then just keep that comment database
 13 open and available as an alternative to mailing in a
 14 hard copy comment or something like that. And then it
 15 can still serve as an alternative should someone be
 16 intending to join in on the meeting and then for some
 17 reason can't make it, they've got another way of
 18 submitting a comment pretty quickly. So yes, we can
 19 make sure that that happens.
 20 CHAIR DREW: Okay. That sounds good. Did
 21 you have additional information?
 22 MS. BUMPUS: So the only other thing I was
 23 going to add is that as I mentioned, we are conducting a
 24 SEPA review, and so we are reviewing all of the same
 25 materials that the Council has already started to

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1 review. We will be compiling a data request, which, of
 2 course, can include some of the Councilmembers'
 3 questions. Staff will also have a set of questions.
 4 We'll send that for additional information, and if we
 5 have everything we need, Staff can proceed with
 6 preparation of the -- of the SEPA documentation for the
 7 SEPA determination.
 8 So there'll be more to follow about that
 9 pretty soon, I think. The sooner we get the data
 10 request out. And then I think we can go from there. So
 11 that was the only other thing I was going to add is that
 12 we are working on the SEPA review now.
 13 CHAIR DREW: So, Councilmembers, I would
 14 like you to send your availability for a public hearing
 15 on October 6th, between 4:00 and 6:00 p.m. to Ms. Owens
 16 because I very much would appreciate as much
 17 participation as we can have from the Council at that
 18 time.
 19 And do you have any other questions for
 20 Staff?
 21 And are you -- and we don't really have to
 22 have a vote on this, but does the approach in terms of
 23 the public hearing and the comment database sound
 24 reasonable to you?
 25 MR. LIVINGSTON: Chair Drew, this is Mike

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1 Livingston. It -- it sounds reasonable to me. I
 2 would -- with the timing of the public hearing, is there
 3 a possibility that this would be coming to us in October
 4 for a vote, then, or are we anticipating needing more
 5 time before that next meeting?
 6 CHAIR DREW: Honestly, I -- I think we need
 7 time to digest this right now before we have an answer.
 8 I heard the timing in terms of what the certificate
 9 holder is looking for is to have some sort of resolution
 10 before the end of the year. We don't have to wait until
 11 the last minute, but I think we want to hear what the
 12 public has to say and make a determination after that.
 13 MR. LIVINGSTON: Thank you.
 14 MS. KELLY: Chair Drew, this is Kate Kelly
 15 again. Has any consideration been given to separating
 16 these into two different decision streams, the two
 17 issues that have been combined?
 18 CHAIR DREW: They -- they are -- I guess
 19 that's one of the questions I have is they seem to me
 20 unrelated, but I think we can have further conversations
 21 as we hear some information. And perhaps -- I don't
 22 know if Mr. Thompson has an answer to that question or
 23 has thought about that, but he may be able to help us
 24 with --
 25 MS. BUMPUS: Chair Drew, this is Sonia

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1 Bumpus. I -- I wanted to share a little bit of
 2 information related to that question. So Staff has
 3 discussed internally the possibility of bifurcating
 4 these -- these two requests. We also see that they are,
 5 you know, basically can stand on their own. And so
 6 one -- one approach that we've talked about amongst
 7 ourselves internally is that after the initial public
 8 hearing session, it might be a good time then to decide
 9 if we want to separate these out.
 10 I would imagine that if we hear comments
 11 about one versus the other or the comments are perhaps
 12 complex in nature, it really would make sense at that
 13 point to perhaps separate these out and if -- if the
 14 Council were to want to hold additional public hearing
 15 sessions to perhaps proceed in holding those additional
 16 sessions with those issues separated out and having a
 17 dedicated hearing session for -- for each by -- by
 18 issue.
 19 So that's sort of what Staff have been
 20 thinking should these start to get tangled or one starts
 21 to perhaps hold up the other.
 22 MS. KELLY: So, again, this is Kate Kelly
 23 and -- and that seems like a good approach. I'm pleased
 24 to keep that option on the table. It seems like the
 25 standard for review and the decision whether to send it

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1 up to the governor or not may be different for the two
 2 paths. So it's -- it's -- I'm glad we're keeping our
 3 options open.
 4 MR. DENGEL: This is Rob Dengel. I would be
 5 supportive of this approach as well knowing that maybe
 6 we could separate.
 7 CHAIR DREW: Okay. Thank you.
 8 Any other comments? Thank you all.
 9 We will -- hearing the comments from the Councilmembers,
 10 we'll ask Staff to proceed with noticing the public
 11 hearing on October 6th and opening the comment database.
 12 I think that concludes our discussion on the
 13 amendment.
 14 Okay. Our next item on the agenda is
 15 Columbia Generating Station and WNP-1/4 for a monthly
 16 report from Mr. Whitehead.
 17 MR. WHITEHEAD: Good afternoon. This is Kip
 18 Whitehead from Energy Northwest. I'll be reporting on
 19 the Washington Nuclear Project 1 and 4 and the Columbia
 20 Generating Station. There are no nonroutine issues to
 21 discuss for the month of August. Are there any
 22 questions?
 23 CHAIR DREW: Any questions?
 24 Thank you. Hearing none, we will move to
 25 our next item. It looks like that is adjournment. So

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1 if there's no other business to come before us, thank
 2 you all for participation today, and this meeting is
 3 adjourned.
 4 (Adjourned at 2:29 p.m.)
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1 CERTIFICATE
 2
 3 STATE OF WASHINGTON
 4 COUNTY OF THURSTON
 5
 6 I, Tayler Garlinghouse, a Certified Shorthand
 7 Reporter in and for the State of Washington, do hereby
 8 certify that the foregoing transcript is true and
 9 accurate to the best of my knowledge, skill and ability.
 10
 11 
 12 Tayler Garlinghouse, CCR 3300
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EFSEC Monthly Council Meeting – Facility Update Format

Facility Name: Kittitas Valley Wind Power Project

Operator: EDP Renewables

Report Date: October 8 2020

Reporting Period: September 2020

Site Contact: Eric Melbardis

Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- Power generated: 18,849 MWh
 - Wind speed: 6 m/s
 - Capacity Factor: 25.97%
-

Environmental Compliance

- No incidents

Safety Compliance

- Nothing to report

Current or Upcoming Projects

- Nothing to report

Other

- No sound complaints
- No shadow flicker complaints

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Wild Horse Wind Facility
Operator: Puget Sound Energy
Report Date: October 6, 2020
Report Period: September 2020
Site Contact: Jennifer Diaz
SCA Status: Operational

Operations & Maintenance

September generation totaled 38,802 MWh for an average capacity factor of 19.77%.

Environmental Compliance

Nothing to report.

Safety Compliance

No lost-time accidents or safety injuries/illnesses.

Current or Upcoming Projects

Nothing to report.

Other

Nothing to report.

EFSEC Monthly Council Meeting – Facility Update

Facility Name: Chehalis Generation Facility
Operator: PacifiCorp
Report Date: October 7, 2020
Reporting Period: September 2020
Site Contact: Mark A. Miller
Facility SCA Status: Operational

Operations & Maintenance

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

- 264,025 MW-hrs generated in August for a year-to-date 1,792,303 MW-hrs and a capacity factor of 55.7%.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Permit status if any changes.

- No changes.

-Update on progress or completion of any mitigation measures identified.

- No issues or updates.

-Any EFSEC-related inspections that occurred.

- None.

-Any EFSEC-related complaints or violations that occurred.

- None.

-Brief list of reports submitted to EFSEC during the monthly reporting period.

- None.

Safety Compliance

-Safety training or improvements that relate to SCA conditions.

- Zero injuries this reporting period and a total of 1889 days without a Lost Time Accident.

Current or Upcoming Projects

-Planned site improvements.

- No planned changes.

-Upcoming permit renewals.

- No upcoming renewals.

-Additional mitigation improvements or milestones.

- No issues or updates.



Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

- **Nothing to report.**

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council).

- **Nothing to report.**

-Public outreach of interest (e.g., schools, public, facility outreach).

- **Nothing to report.**

Respectfully,

A handwritten signature in black ink, appearing to read "M. Miller".

Mark A. Miller--P75451
Manager, Gas Plant
Chehalis Generation Facility

Desert Claim Wind Power Project

October project update

[Place holder]

Columbia Solar Project

October project update [Place
holder]

EFSEC Monthly Council Meeting – September 2020

Facility Name: **Columbia Generating Station and Washington Nuclear Project 1 and 4 (WNP-1/4)**

Operator: **Energy Northwest**

Report Date: **October 7, 2020**

Reporting Period: **September 2020**

Site Contact: **Kip Whitehead**

Facility SCA Status: (Pre-construction/Construction/Operational/Decommission): **Operational**

CGS Net Electrical Generation for September 2020: 817,086 MW-Hrs

-Relevant energy generation information, such as wind speed, number of windy or sunny days, gas line supply updates, etc.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

-Brief list of reports submitted to EFSEC during the monthly reporting period.

Only routine reports submitted for the month

Current or Upcoming Projects

-Planned site improvements potentially related to SCA conditions, EFSEC-issued permits, or future permitting needs.

- **Energy Northwest recently signed a new lease agreement with the Department of Energy.**
- **The new lease agreement requires the Industrial Development Complex (IDC) located at WNP 1/4 to no longer use groundwater as its water source by July 2022.**
- **The IDC is planning to use surface water from the Columbia River as its water source and will be installing a new water filtration system at the site.**

Other

-Current events of note (e.g., Covid response updates, seasonal concerns due to inclement weather, etc.).

- **Pandemic Response: Benton-Franklin County is currently under a modified phase 1. Energy Northwest began a slow transition of non-essential employees back to the facilities in a reduced capacity to ensure social distancing measures are maintained.**

-Personnel changes as they may relate to EFSEC facility contacts (e.g., introducing a new staff member who may provide facility updates to the Council). **Shannon Khounnala is no longer the Environmental Manager at Energy Northwest. The new Environmental Manager is Brad Barfuss.**

EFSEC Monthly Council Meeting

Facility Name: Grays Harbor Energy Center
Operator: Grays Harbor Energy LLC
Report Date: October 20, 2020
Reporting Period: September 2020
Site Contact: Chris Sherin
Facility SCA Status: Operational

Operations & Maintenance (only applicable for operating facilities)

- GHEC generated 374,967MWh during the month and 1,757,768MWh YTD.

The following information must be reported to the Council if applicable to the facility:

Environmental Compliance

- There were no emissions, outfall or storm water deviations, during the month.
- Monthly Discharge Monitoring Reports were submitted to staff.
- Annual Relative Accuracy Test Audit (RATA) results were submitted to staff.

Safety Compliance

-None.

Current or Upcoming Projects

-Gray Harbor Energy LLC submitted additional information to EFSEC staff in response to follow up requests on the PSD amendment application.

Other

-Ongoing COVID-19 mitigation efforts at the site.

-

Energy Facility Site Evaluation Council

Non-Direct Cost Allocation for 2nd Quarter FY 2021

October 1, 2020 – December 31, 2020

The EFSEC Cost Allocation Plan (Plan) was approved by the Energy Facility Site Evaluation Council in September 2004. The Plan directed review of the past quarter's percentage of EFSEC technical staff's average FTE's, charged to EFSEC projects. This along with anticipated work for the quarter is used as the basis for determining the non-direct cost percentage charge, for each EFSEC project.

Using the procedures for developing cost allocation, and allowance for new projects, the following percentages shall be used to allocate EFSEC's non direct costs for the 2nd quarter of FY 2021

| | |
|---|------------|
| Kittitas Valley Wind Power Project | 9% |
| Wild Horse Wind Power Project | 9% |
| Columbia Generating Station | 24% |
| Columbia Solar | 8% |
| WNP-1 | 3% |
| Whistling Ridge Energy Project | 3% |
| Grays Harbor 1&2 | 15% |
| Chehalis Generation Project | 12% |
| Desert Claim Wind Power Project | 8% |
| Grays Harbor Energy 3&4 | 9% |



Sonia E. Bumpus, EFSEC Manager

Date: 10/19/2020