

Rocky Mountain Power
Docket No. 16-035-36
Witness: James Campbell

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Direct Testimony of James Campbell in Support of the Gadsby Emissions
Curtailment Program

September 2016

1 **Q. Please state your name, business address and present position with Rocky**
2 **Mountain Power ("the Company"), a division of PacifiCorp.**

3 A. My name is James Campbell and my business address is 1407 West North
4 Temple, Suite 310, Salt Lake City, Utah, 84116. I am currently employed as a
5 Senior Environmental Analyst for Rocky Mountain Power.

6 **QUALIFICATIONS**

7 **Q. Briefly describe your educational and professional background.**

8 A. I have a Bachelor of Science in Materials Science and Engineering, a Master of
9 Engineering in Environmental Engineering and a Master of Business
10 Administration all from the University of Utah. I have previously worked as an
11 engineer with Foster Wheeler, Boston Scientific, and the Utah Division of Air
12 Quality. In November 2007, I joined the Company as a Senior Environmental
13 Analyst.

14 **Q. What are your responsibilities as Senior Environmental Analyst?**

15 A. My primary responsibilities include reviewing proposed and final environmental
16 rules, regulations, and laws. Also, I participate on state and local environmental
17 stakeholder processes representing the Company. Further, I support the
18 Company's compliance activities for state and federal environmental regulations.

19 **PURPOSE OF TESTIMONY**

20 **Q. What is the purpose of your testimony in this proceeding?**

21 A. My testimony supports the Company's proposed Gadsby Emissions Curtailment
22 Program described in the Application, and attached as Exhibit E thereto. Through
23 this Application the Company seeks Commission authorization for this program

24 under U.C.A. § 54-20-105(1)(e).

25 **GADSBY EMISSIONS CURTAILMENT PROGRAM**

26 **Q. Please describe the Company's proposed Gadsby Emissions Curtailment**
27 **Program.**

28 A. This program would establish a process where the Gadsby Power Plant would
29 curtail operations during winter inversion air quality events, as defined by the
30 Utah Division of Air Quality (“UDAQ”), to reduce emissions and reimburse the
31 system for the curtailment. Full program details are included in the Gadsby
32 Emissions Curtailment Program document which I am sponsoring and which is
33 included as Exhibit E to the Application.

34 **Q. What benefits will the Gadsby Emissions Curtailment Program provide to**
35 **customers and the state of Utah?**

36 A. The DAQ issues action alerts when pollution is approaching unhealthy levels.
37 These alerts proactively notify residents and businesses before pollution build-up
38 so they can begin to reduce their emissions. When pollution levels reach 15
39 $\mu\text{g}/\text{m}^3$ for PM_{2.5}, DAQ issues a ‘yellow’ or voluntary action day, urging Utah
40 residents to drive less and take other pollution reduction measures. At 25 $\mu\text{g}/\text{m}^3$,
41 10 $\mu\text{g}/\text{m}^3$ below the EPA health standard, DAQ issues a “red” or mandatory
42 advisory prohibiting burning of wood and coal stoves or fireplaces. It is at the 25
43 $\mu\text{g}/\text{m}^3$ level when the Company will take action to curtail the Gadsby Steam
44 units.

45 **CONCLUSION**

46 **Q. Please summarize the proposal for the Gadsby Emissions Curtailment**
47 **Program contained in this Application.**

48 A. After receiving notification from the DAQ that an “air quality event” is in effect,
49 the Company will curtail the operations of the Gadsby Power Plant. The
50 Company will calculate the system impacts of not operating the system resource
51 and request funding available under U.C.A. § 54-7-12.8(6)(b)(ii)(B) to cover costs
52 of the curtailment during the five-year pilot program period. The curtailment
53 program is budgeted for a total \$500,000. Once the funds are exhausted the
54 program will terminate.

55 **Q. In your opinion, is the Company's emissions curtailment program consistent**
56 **with STEP and in the interest of Rocky Mountain Power's customers?**

57 A. Yes. Section 54-20-105-1(e) states “a program to curtail emissions from thermal
58 generation plant in the Salt Lake non-attainment area during a non-attainment
59 event as defined by the Division of Air Quality.” The Gadsby Emissions
60 Curtailment Program is consistent with this language. Further, since the Gadsby
61 curtailment program may reduce emissions in the Salt Lake non-attainment area
62 (where customers reside) and assist the state in complying with federal National
63 Ambient Air Quality Standards, the curtailment program is in customers’
64 interests.

65 **Q. Does this conclude your direct testimony?**

66 A. Yes.