Monthly Council Meeting

EFSEC

September 15, 2020
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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A P P E A R A N C E S

Councilmembers:

KATHLEEN DREW, Chair
KATE KELLY, Department of Commerce
ROB DENGEL, Department of Ecology
MIKE LIVINGSTON, Department of Fish and Wildlife
STACEY BREWSTER, Utilities and Transportation Commission

EFSEC STAFF:

SONIA BUMPUS
AMI KIDDER
AMY MOON
STEWART HENDERSON
KYLE OVERTON
JOAN OWENS
TAMMY MASTRO

ASSISTANT ATTORNEY GENERAL:

JON THOMPSON

ALSO IN ATTENDANCE:

CHRIS SHERIN, Grays Harbor Energy
JENNIFER DIAZ, Wild Horse Wind Facility
TIM MCMAHON, Stoel Rives
KIP WHITEHEAD, Energy Northwest
KAREN MCGAFFEY, Perkins Coie
MACKENZIE EVANS, Invenergy
SARAH DE GROOT, Invenergy
FRANK SARDUY, South Shore Environmental
ERIC MELBARDIS, EDP Renewables
LACEY, WASHINGTON; SEPTEMBER 15, 2020

1:30 P.M.

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PROCEEDINGS

CHAIR DREW: Good afternoon. This is Kathleen Drew, Chair of the Washington State Energy Facility Site Evaluation Council for our September meeting.

And will the clerk call the roll, Ms. Mastro?

MS. MASTRO: Good afternoon, Chair Drew, Councilmembers. This -- for the record, this is Tammy Mastro.

Department of Commerce?

MS. KELLY: Kate Kelly, present.

MS. MASTRO: Department of Ecology?

MR. DENGEL: Rob Dengel, present.

MS. MASTRO: Fish and Wildlife?

MR. LIVINGSTON: Mike Livingston, present.

MS. MASTRO: Department of Natural Resources?

CHAIR DREW: Excused.

MS. MASTRO: Utilities and Transportation Commission?
MS. BREWSTER: Stacey Brewster, present.

MS. MASTRO: EFSEC Staff, Sonia Bumpus?

MS. BUMPUS: Sonia Bumpus, present.

MS. MASTRO: Ami Kidder?

MS. KIDDER: Present.

MS. MASTRO: Joan Owens?

MS. OWENS: Present.

MS. MASTRO: Amy Moon?

MS. MOON: Present, Tammy, thanks.

MS. MASTRO: Kyle Overton?

MR. OVERTON: Yeah, this is Kyle Overton, present.

MS. MASTRO: Stewart Henderson?

MR. HENDERSON: Here.

MS. MASTRO: Patty Betts or AAG Jon Thompson?

MR. THOMPSON: Yes, I am present.

MS. MASTRO: Thank you, Mr. Thompson.

Chair Drew is present and there is a quorum for the regular EFSEC Council. Thank you.

CHAIR DREW: Thank you.

Is there anyone else on the line who would like to introduce themselves?

MR. SHERIN: Chris Sherin, Grays Harbor Energy Center.
MS. DIAZ:  Jennifer Diaz, Puget Sound Energy.

MR. MELBARDIS:  Eric Melbardis, EDP Renewables.

MR. MCMAHON:  Tim McMahon, Stoel Rives.


(Multiple speakers.)

MS. EVANS:  Mackenzie Evans, Invenergy.

MS. MCGAFFEY:  Karen McGaffey, Perkins Coie.

MR. SARDUY:  Frank Sarduy, South Shore Environmental.

CHAIR DREW:  There were a couple people from Invenergy that we may not have the correct spelling of your name, so, Mr. Sherin, will you make sure that gets to Ms. Owens and so we can make sure and have the minutes correct?

MR. SHERIN:  Yes, Chair Drew, I will.

CHAIR DREW:  Thank you.

Okay. Moving on to the proposed agenda in front of you. Councilmembers, we have a proposed agenda. Is there a motion to approve the agenda?

MS. KELLY:  Kate Kelly, move to approve.

MR. DENGEL:  Second.

CHAIR DREW:  Thank you. I think that was
Mr. Dengel for a second.

MR. DENGEL: Yes.

CHAIR DREW: Any discussion? All those in favor, please say aye.

COUNCILMEMBERS: Aye.

CHAIR DREW: Opposed? Motion carries.

Moving on to the meeting minutes from August 18th, 2020. You have received them in your packets and they are presented on the screen. Is there a motion to adopt the minutes from August 18th, 2020?

MR. DENGEL: Motion to approve. This is Rob Dengel.

CHAIR DREW: Thank you.

MS. KELLY: Second, Kate Kelly.

CHAIR DREW: Okay. Thank you. It's been moved and seconded.

Are there any comments or corrections on this transcript of the meeting?

Hearing none, all those in favor of adopting the minutes, say aye.

COUNCILMEMBERS: Aye.

CHAIR DREW: Opposed? Minutes are adopted. So we will now move on to our -- the rest of our agenda. And first up is Kittitas Valley Wind Power Project, Mr. Melbards.
MR. MELBARDIS: Good afternoon, Chair Drew, EFSEC Counsel. This Eric Melbardis with EDP Renewables for the Kittitas Valley Wind Power Project. We have nothing nonroutine to report during the period.

Quick update on the smoke situation by us. We're currently on work stand-downs because our -- our AQI, air quality indexes, are at times above 500.

CHAIR DREW: Thank you. And I know that's also been going on for some manner of days, so difficult time.

MR. MELBARDIS: Yes, thank you.

CHAIR DREW: Moving on to the Wild Horse Wind Facility, Ms. Diaz?

MS. DIAZ: Yes -- yes, thank you, Chair Drew, Councilmembers, and EFSEC Staff. This is Jennifer Diaz with Puget Sound Energy for the Wild Horse Wind Facility, and I have nothing nonroutine to report for the month of August.

CHAIR DREW: Thank you.

MS. OWENS: Looks like I'm having trouble with my documents here. Just one moment, please.

CHAIR DREW: Okay. No one is speaking.

Thank you for asking that question in the chat.

So is -- our next item on the agenda -- there you go -- is the Chehalis Generation Facility.
Mr. Miller or Mr. Smith?

MR. OVERTON: This is Kyle Overton, the EFSEC site specialist for the Chehalis facility.

CHAIR DREW: Yes.

MR. OVERTON: For the month of August, the Chehalis facility had no nonroutine items to report.

CHAIR DREW: Okay. Thank you.

For the Desert Claim Wind Power Project, Ms. Moon?

MS. MOON: Good afternoon, Council Chair Drew and members of the Council. This is Amy Moon providing the update for the Desert Claim project, and EFSEC Staff continue to coordinate with Desert Claim; however, at this time, there are no project updates.

CHAIR DREW: Thank you.

Columbia Solar Project update, is that Mr. Overton or...

MS. KIDDER: Chair Drew, this is Ami Kidder. I'll be providing the update for this month's Columbia Solar Project update.

Good afternoon, Chair Drew and Council. For this month, the certificate holder continues to update EFSEC Staff on their progress preparing preconstruction plans for submission. Staff will update Council as things progress.
CHAIR DREW: Okay. Thank you.

Okay. Invenergy, Grays Harbor Energy,

Mr. Sherin?

MR. SHERIN: Good afternoon, Chair Drew and Councilmembers. For the month of August, I have no nonroutine items to report other than we submitted applications for some permit amendments which we will cover further. Thank you.

MS. OWENS: Looks like I have to reopen the document. One moment, please.

CHAIR DREW: Okay. Is this the presentation, then?

MS. OWENS: Okay. We should be good now.

CHAIR DREW: Okay. Are we going to start with the presentation by Mr. Sherin or the Staff presentation?

MS. BUMPUS: I believe we're going to...

MR. SHERIN: Yes, Chair Drew, I'll start it and then I'll hand it off to -- for the asset managers with Invenergy.

CHAIR DREW: Okay. Please, go ahead.

MR. SHERIN: Okay. Do you have the slides?

Again, Chair Drew, Councilmembers, today we just have a brief presentation for the Council. Our application to amend our site certification agreement,
SCA Amendment No. 5 and our Prevention of Significant Deterioration, PSD, Amendment 4 facilitate upgrading our combustion turbines.

Next slide, please. There is just a brief overview of what we'll cover.

Next slide. And then, again, I'm Chris Sherin, the plant manager. Also here at the facility I have Eric Pace, our plant engineer. Also on the call are our asset managers, Sarah de Groot, Mackenzie Evans. We also have Phil Mackey and Frank Sarduy on the call from South Shore Environmental and Karen McGaffey, our -- one of our attorneys with Perkins Coie.

Next slide, please. So just I'll provide a brief overview of Grays Harbor for our -- specifically a few of our newer Councilmembers. Grays Harbor Energy, LLC is a subsidiary of Invenergy, which is one of the world's leading privately held stable energy companies. More than a hundred natural gas, wind, and solar and storage facilities.

EFSEC first permitted a natural gas power plant at Satsop in 1996, which was Site Certification Agreement Amendment 2. UP Energy North America commenced construction of the facility in 2001 and subsequent -- subsequently ceased construction in 2003. Invenergy acquired the project in 2005 and resumed
construction in 2007. We completed construction in 2008
and been operating the facility ever since.

Grays Harbor Energy Center is a 650-megawatt
rated capacity two-by-one combined cycle natural gas
power generation facility located in Elma, Washington,
and that combined cycle unit is composed of two General
Electric, GE, 7FA.03 combustion turbine generators
coupled with Aalborg heat recovery steam generators and
a GE D11 steam turbine generator.

In 2011, the Council amended the Site
Certification Agreement Amendment No. 5 to authorize
construction of two more units, Units 3 and 4, to double
the size of the facility. This expansion has not yet
been built.

Grays Harbor Energy Center is one of the
most efficient natural gas facilities in the region and
as such, we have been operating with greater frequency
as peak demand in the region has increased.

We've always had a good working relationship
with EFSEC and its staff, and we're pleased to be here
today to talk about what we think is a pretty simple
request, to amend our Site Certification Agreement and
modify the PSD Permit so that we can install the latest
GE equipment to our facility.

At this point, I'll hand off the
presentation to Mackenzie Evans, the plant's asset manager, and she'll cover the advanced gas path upgrade and the amendment.

MS. EVANS: Thanks, Chris. You can probably go to the next slide.

So as Chris mentioned, Grays Harbor Energy Center has been supplying power to the Northwest Power Pool since 2008. So in framing today's conversation, it's -- it's important to understand the changing market dynamics in the Northwest Power Pool. And as you can see here detailed on this side, projected coal and hydro retirements are expected to be over 4.4 gigawatts in the next decade. On top of that, peak demand is expected to increase half a percent annually over the same time period.

So together these market forces combine and contribute to the tightening reserve margins and subsequently, a projected increase in Grays Harbor's operating hours as Grays Harbor is already one of the Northwest Power Pool's most efficient, if not the most efficient, gas-fired power plant.

And the last thing, you know, kind of to highlight here is just that Grays Harbor Energy does provide flexible gas power that helps with the increasing integration of intermittent renewable
resources.

Next slide, please. So now that you have a little bit more background on Grays Harbor and its role in the Northwest Power Pool, we are here today outlining the objectives of our recently submitted SCA and PSD amendments, so our objectives are twofold. First, the installation of GE's advanced gas path package and next, the extension of Units 3 and 4's construction deadline.

So specifically we submitted some materials that should be in your packet. Kind of walk through those quickly. First, we have the letter requesting the amendment. This letter discusses the Council's regulations concerning amendments and explains how our request satisfies each of those.

Next, we have a SEPA checklist which explains why the requested amendment is not expected to have any significant environmental impacts.

Next, is the redline of the SCA that shows the specific parts of the SCA that we have asked the Council to amend.

And lastly, the PSD minor modification application.

So this is the detailed air permitting material. And we do want to emphasize that we are not asking for any changes in the PSD permit limit; however,
but because the equipment would change, we do need a
minor modification of the PSD permit. So this
application obviously goes through all the regulatory
issues in detail and provides the technical information
for the EFSEC Staff and Ecology to review.

Next slide, please. So the first objective
of the amendment is installation of GE's advanced gas
path package, or AGP, in both units. So AGP involves an
upgrade to turbine software and hardware with more
robust parts manufactured from enhanced materials or
increased reliability. So if you look at the picture on
the slide here, the air comes in on the left side
through the inlet, it's compressed in the compressor
section, and then the gas is combusted and goes to the
turbine section to generate the power.

So the parts we're talking about here
looking at replacing is what's known as the hot gas path
section, which is just after the combustion section, so
these parts do see the highest temperatures. So then by
swapping them out, swapping the existing turbine parts
out with these AGP components, the turbines are able to
produce more output at an increased firing temperature,
which improves overall efficiency.

Next slide, please. So diving in a little
bit more about the upgrade. This is an upgrade that GE
does all the time. Technology has been around for several years. It's one of GE's most common upgrades. In fact, there are other generators in the area who have already upgraded their units to this technology.

So the upgrade is entirely interior to the gas turbines. No change in the turbine footprint. And, again, to be clear, we're not requesting any change that limits any existing air water permits. And with that said, we do want to point out that the greenhouse gas -- excuse me, greenhouse gas emission rate actually improves with the increased efficiency from AGP.

In terms of timing, installation is planned for spring of 2021 as a part of the facility's regularly scheduled annual maintenance outage. So with the units already on outage, no additional downtime is required for installation. And kind of walking back from there, in order to meet that timeline, we did submit the material in August and we're here talking to the Council today in September so that we can get approval before the end of the year to buy the equipment and be good to go for next spring.

Next slide, please. So to close the loop here, the chart on this slide details Grays Harbor's projected operations through 2029. We wanted to show this to be clear that the demand for efficient natural
gas-fired power is going to increase over the next several years with the retirements discussed earlier. So we expect the plan to run more often even if the equipment is not changed. So the modest increase in capacity from AGP means that Grays Harbor Energy Center can provide a bit more power to meet this increasing demand. And the improvement and efficiency means that the facility may also run a little bit more often because as we know, gas generation in the region is dispatched -- dispatched based on efficiency. So of course, you know, if Grays Harbor is running instead of less efficient generation, it means less gas is consumed and fewer greenhouse gases are emitted overall in order to meet the regional load.

Next slide, please. Moving on to the second objective of the amendments, the extension of the construction deadlines for Units 3 and 4. So the Council and the governor have already approved the addition of two more combustion turbine units at the facility as Chris noted. The SCA currently requires construction of these units to begin by 2021. We would like to extend that to 2028, which we think better lines up with the need for generation in the region resulting from the expected retirements.

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

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

CHAIR DREW: Thank you very much.

Now we will move on to Staff. Ms. Bumpus, do you have questions or would you like to go ahead and make your comments?

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

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

So, again, for the record, this is Sonia Bumpus, and I am going to talk about EFSEC's SCA amendment process. Going to just kind of provide a high level overview of -- of how the process works, and afterwards, I'd like to make some recommendations for the Council to consider with respect to next steps for this SCA amendment that's been proposed.

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

So now that we have a written request for an SCA amendment, we look to WAC 463-66-030. This requires the Council to hold one or more public hearing sessions at the times and places determined appropriate by the Council. And so this is where Staff at the end of this overview will make a recommendation. But essentially, the Council can decide as they go along if they need additional information and if they want to conduct additional public hearing sessions on the amendment request.
The public hearings, specifically the first public hearing, historically includes a presentation by the certificate holder about the amendment they're requesting, and it also provides an opportunity for public comment on the amendment request before the Council. So you could imagine that once we've had the opportunity of public comment and we've received public input, that helps move the process along particularly with respect to the SEPA process which EFSEC conducts under our promulgation of SEPA WAC in 463-47.

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

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

Number one is the intention of the original
SCA. So you're looking at whether the proposal is consistent with the intent of the original SCA.

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

Three, consistent with public health safety and welfare.

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

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

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

Typically around that time is when Staff would make a recommendation to the Council on a path forward whether, you know, we would recommend that the Council proceed by approval of -- you know, through resolution or would it be triggering those criteria in 463 -- 463-66-080 requiring approval by the governor.

So I'm not going to make a recommendation with respect to that at this time, but I wanted to let the Council know about those two paths for approval down the road.

So that's -- that's the overview of our process, and I'm going to stop here before I get into what I would recommend as next steps to see if the Council have any questions about any of these rules that I've just gone through.

CHAIR DREW: So what I'd like to do perhaps is to ask questions -- let's see, I -- I think I still have some questions on the information and -- that was provided to us by Grays Harbor Energy and Invenergy, and so why don't we start with those questions. I know this is a lot coming at the Council right now and I'm sure that, Sonia, you will also share those citations in an email so people don't have to write them down. And then we'll take questions on the process and then we'll talk
So I will, if we can, go back to a couple questions about the information from Invenergy and Grays Harbor Energy. Mr. Sherin, I don't know how you want to handle that in terms of responses, but I have -- first of all, my question as we went through the items provided the SEP- -- SEPA checklist as I reviewed it only applies to the advanced gas path and not to the construction extension; is that correct?

MR. SHERIN: Yes, Chair Drew, that's correct.

MS. MCGAFFEY: Excuse me, Chair Drew, this is Karen McGaffey. The checklist actually applies to both. I think from our view, the actual immediate effects of the amendment all relate to the advanced gas package. There wouldn't be any environmental effects from a -- the extension by itself. The Council's subsequent decision when Grays Harbor requests authorization to begin construction would clearly require some consideration by the council of environmental issues at that point. But I think that extension by itself does not have additional environmental impacts and that's why you don't see a bunch of things discussed in the checklist.

CHAIR DREW: Okay. I understand that. And
so the -- I'll -- I'll skip to a different question I have which is along those same lines. So the current Amendment 5 allows for construction of two-by-one combined cycle turbine and steam turbines the same as is currently used in Units 1 and 2; is that correct?

MR. SHERIN: Yes, that's correct.

CHAIR DREW: So would you imagine putting in those exact same units?

MR. SHERIN: I wouldn't imagine it would put in the exact same units, but I wouldn't rule it out either. I think this is what Ms. McGaffey was implying is that if we -- when we -- if we were to build Units 3 and 4, then we would have -- pretty -- we'd pretty much have to go through another amendment and the whole process for those two units.

CHAIR DREW: Okay. So that -- that was actually the point I was getting to I -- is that, and so I think that we should lay that out here that if there are changes to what was approved in the Amendment 5 for the facility for the Units 3 and 4, then we would have to do another amendment, which would have its own SEPA checklist with it?

MR. SHERIN: Yes, that would be correct.

CHAIR DREW: Okay. So another question I have is -- and -- and this may be something that you
want to get back to us on. I'm -- followed the chart a little bit in terms of, I mean, I saw the lines go up in terms of current capacity and with -- and this is with the advanced gas path, so let me clarify that. And then the additional capacity provided by that but also a forecast that's rather substantially increased in terms of the actual sold generation power from the facility. Excuse me if I'm not using the right term there. And that's confusing to me how that forecast was developed because it looks very divergent from the history of the facility.

MS. EVANS: I can maybe take a first stab -- stab at this one. So with the impact of the retirements expected in the region as -- as we kind of walked through that that creates a larger need for a gas-fired power -- power generation. So that was kind of what we're seeing in the market is that we expect to be operating more than we have historically with that -- with or without the AGP installation based on changing market forces and we foresee a need for more power generation.

CHAIR DREW: So is that an internal, then, forecast as opposed to an external forecast?

MS. EVANS: I believe so, yes. We -- we do have a, you know, commercial modeling team.
CHAIR DREW: Okay. Yeah, I'd be -- I'd be interested in -- in more detail because it's quite substantially different, and so I'm -- I'm interested in more information along those lines.

MR. SHERIN: Chair Drew, I'll also add that even from 2015 on, basically our total megawatt hours produced in a year has increased. 2018 it dropped off, but that was because of the -- essentially we didn't run for that last month and three-quarters -- we didn't run for a month and three-quarters because of the pipeline explosion up in British Columbia. We were on pace to have a -- potentially have a record-setting year in 2018 for total megawatt hours produced, and then last year in 2019 we did actually have a record-setting year for the plant's total capacity.

CHAIR DREW: And then --

MR. SHERIN: Megawatt hours produced over the course of the year and that -- that trend we expect to continue.

CHAIR DREW: And this year was a little odd too.

MR. SHERIN: Yes, we had a -- this year that will not be the case. This year due to COVID demands down, it's been a challenging year and we also had a forced outage for three and a half months on one of the
turbines. So we physically -- with that occurring, we physically -- this year we physically couldn't produce more than in the past.

CHAIR DREW: Okay. Well, it would be -- it would be, I think, helpful to the Council to have some view of the recent past and -- and the considerations in the forecast in the future. Thank you.

Let's see, then my last question at this point is, so in terms of the construction extension, why 2028, why seven years?

MS. EVANS: Sarah, you want to take that one?

MS. DE GROOT: Sure, I would be happy to.

So I -- you know, our thought was to kind of keep this in line with when we're seeing coal retirements and, you know, assuming -- or -- or knowing that it would take a couple years for construction to -- to account for that as well. So that timeline is -- is aligned with -- with the coal retirements in the area.

CHAIR DREW: Okay.

MS. DE GROOT: And when there would be a potential need for additional capacity.

CHAIR DREW: Thank you.

I saw in the chat that -- that Mr. Dengel has some questions?
MR. DENGEL: Yes, I think they may have just answered one of them. So it sounds like you mentioned in the supporting materials that the market conditions then currently support the construction; however, it may support it in 2028. Is that what you're referring to with the -- with the phase-out creating that additional demand, is that the market conditions that would facilitate the need for this construction or are there other factors that would also heavily weigh in and make this more tentative?

MS. DE GROOT: Yeah, great question. That is the primary driver. I think there is an increase in -- we're seeing an increase in peak demand as well, but the -- the main driving factor would be coal retirements.

MR. DENGEL: I have one other question regarding the emissions. I don't know if you have this information available, but looking at the -- kind of your -- your operation as a whole, with the -- with the gas pathway, it does sound like there'll be an increase in emissions to the facility as a whole but a decrease in the -- in the pollution per kilowatt hour.

Overall to your system, because you're phasing out some coal plants but you're also phasing out hydro as well, where does your kind of overall emissions
land as a result of making this change? Is it an -- is it an increase, decrease or is it all negligible?

MR. SARDUY: I can field that one. This is Frank Sarduy with South Shore Environmental. The data that GE has provided has -- has shown that for all of the pollutants that -- for which the facility has permit limits and does not have a control, all of those emissions will stay the same or go down on a pounds per MBtu basis.

The -- there -- as far as knots in CO goes, any -- any increases would be able to be addressed by the plant's emission control systems by the SCR and the oxidation catalyst, so we wouldn't expect to see increases in those. And as part of the application, there were no requests for increased permit limits so they can live with the -- with the -- with the permit as written.

MR. DENGEL: Okay. So I -- I get the immediate facility. I mean -- and I appreciate you providing that additional recap and clarity. I'm just wondering with the retirements going on and the increased capacity, overall looking at what those other emissions were on those retirements and going to this, I'm just wondering emission-wise is it resolving in an increase, decrease, or is it -- is it tough to tell;
does that make sense?

MR. SARDUY: I -- I gotcha. The -- I -- I
don't have that -- that information with me. I know
that there are some coal retirements, so obviously
there's -- there's going to be a great improvement there
when -- when those units are retired. But I -- I don't
have a percentage number that I could give you on -- on
what the net change would be.

MR. DENGEL: Thank you. That's all the
questions that I had. Appreciate it.

CHAIR DREW: Okay. Thank you.

Are there other questions from
Councilmembers?

Okay. Hearing none, are there questions
about the process as you heard outlined by EFSEC
manager, Sonia Bumpus?

MS. KELLY: Chair Drew, this is Kate Kelly.

CHAIR DREW: Yes, go ahead.

MS. KELLY: I -- I guess that -- to
understand the process going forward, the -- the
application materials that we have are a little thin on
the extension of time for the 3 and 4, and there's just
not a lot of substance in there. Are -- so I'm -- I'm
just trying to understand are we going to receive more
material about it so that we can better understand the
implications of what's being asked and what happens if this doesn't get approved?

And to tack onto that, I -- I got a -- particularly reading the existing site certificate, it was a little confusing about what the current requirements are and there was five years and there was ten years and just understanding what the implications are for -- for the site amendment permits that are on it.

CHAIR DREW: I think that what we will do as Councilmembers is share some of the questions that we want for additional information with our Staff, and they will then provide that in a data request to the Grays Harbor Energy for additional information. And we can also ask additional questions at the public hearing coming up. So I think those are both two methods where we can make sure that we understand the specific information and the context. And I agree with you, it is quite thin on the construction timeline extension in terms of information.

MS. KELLY: Thank you.

CHAIR DREW: Are there questions about the process from Councilmembers?

MR. DENGEL: So just one clarification on the -- on the time extension and the engines. So my --
my take -- my understanding is that if you were to grant this permit extension, if there was to be any change in the proposed -- because there was a prior EFSEC decision for the engines themselves, if there was any change as far as what those engines look like outside of the current proposal, it would have to come back for a later amendment; is -- is that correct?

CHAIR DREW: That's correct.

MR. DENGEL: Okay. Thank you.

CHAIR DREW: So, Ms. Bumpus, if you want to proceed with the next steps.

MS. BUMPUS: Thank you, Chair Drew. Yes, so as I was saying, there are -- there's a first public hearing that the Council is required to hold and of course additional public hearing sessions can be held. So to start, Staff would like to recommend that the Council conduct a public hearing session on Invenergy's SCA Amendment request on October 6th and that that public hearing session be conducted virtually as we've been holding our Council meetings, our monthly Council meetings, and we provide a presentation, or rather the certificate holder would provide a presentation. We could, of course, provide some additional information to the Council and public. And another portion of the meeting would be for public comment, and we would do
this virtually.

The -- the time for the meeting that we are thinking would be best is to start the meeting at 4:00 p.m. and go to 6:00 p.m. We also have a public comment database that we would activate on EFSEC's website during that day so that those who could not call into the meeting or attend on the platform in which we're hosting it would -- would be able to submit -- they could also mail it in, but submit an electronic comment to EFSEC.

CHAIR DREW: So just to --

MS. BUMPUS: There are --

CHAIR DREW: I'm -- I'm sorry, on that point can we clarify? I heard you say that we would activate the comment database on that day, but we would give people more than that day to comment I would assume?

MS. BUMPUS: Well, we will notice the -- the public hearing session to the public if the Council's agreeable to what we're proposing, this proposed schedule. We would notice that likely this week, and the public is -- is free to submit, you know, comments to us now. The -- Chair Drew, are you wanting to know if we could activate our comment database for basically from the beginning of the notification until the meeting?
CHAIR DREW: I think that would be helpful, because if we want to have all the comments collected by the meeting date, then that gives people different opportunities of time to comment rather than extending it beyond hearing that date. Because I -- I understand they can send them in writing too, but it's much easier perhaps for a lot of people to enter a comment in a database. So just a question on that.

MS. BUMPUS: Yeah, so I -- I think that that -- that would be fine. We can certainly activate the comment database at the same time as the public notice goes out and then just keep that comment database open and available as an alternative to mailing in a hard copy comment or something like that. And then it can still serve as an alternative should someone be intending to join in on the meeting and then for some reason can't make it, they've got another way of submitting a comment pretty quickly. So yes, we can make sure that that happens.

CHAIR DREW: Okay. That sounds good. Did you have additional information?

MS. BUMPUS: So the only other thing I was going to add is that as I mentioned, we are conducting a SEPA review, and so we are reviewing all of the same materials that the Council has already started to
review. We will be compiling a data request, which, of course, can include some of the Councilmembers' questions. Staff will also have a set of questions. We'll send that for additional information, and if we have everything we need, Staff can proceed with preparation of the -- of the SEPA documentation for the SEPA determination.

So there'll be more to follow about that pretty soon, I think. The sooner we get the data request out. And then I think we can go from there. So that was the only other thing I was going to add is that we are working on the SEPA review now.

CHAIR DREW: So, Councilmembers, I would like you to send your availability for a public hearing on October 6th, between 4:00 and 6:00 p.m. to Ms. Owens because I very much would appreciate as much participation as we can have from the Council at that time.

And do you have any other questions for Staff?

And are you -- and we don't really have to have a vote on this, but does the approach in terms of the public hearing and the comment database sound reasonable to you?

MR. LIVINGSTON: Chair Drew, this is Mike
Livingston. It -- it sounds reasonable to me. I would -- with the timing of the public hearing, is there a possibility that this would be coming to us in October for a vote, then, or are we anticipating needing more time before that next meeting?

CHAIR DREW: Honestly, I -- I think we need time to digest this right now before we have an answer. I heard the timing in terms of what the certificate holder is looking for is to have some sort of resolution before the end of the year. We don't have to wait until the last minute, but I think we want to hear what the public has to say and make a determination after that.

MR. LIVINGSTON: Thank you.

MS. KELLY: Chair Drew, this is Kate Kelly again. Has any consideration been given to separating these into two different decision streams, the two issues that have been combined?

CHAIR DREW: They -- they are -- I guess that's one of the questions I have is they seem to me unrelated, but I think we can have further conversations as we hear some information. And perhaps -- I don't know if Mr. Thompson has an answer to that question or has thought about that, but he may be able to help us with --

MS. BUMPUS: Chair Drew, this is Sonia
Bumpus. I -- I wanted to share a little bit of information related to that question. So Staff has discussed internally the possibility of bifurcating these -- these two requests. We also see that they are, you know, basically can stand on their own. And so one -- one approach that we've talked about amongst ourselves internally is that after the initial public hearing session, it might be a good time then to decide if we want to separate these out.

I would imagine that if we hear comments about one versus the other or the comments are perhaps complex in nature, it really would make sense at that point to perhaps separate these out and if -- if the Council were to want to hold additional public hearing sessions to perhaps proceed in holding those additional sessions with those issues separated out and having a dedicated hearing session for -- for each by -- by issue.

So that's sort of what Staff have been thinking should these start to get tangled or one starts to perhaps hold up the other.

MS. KELLY: So, again, this is Kate Kelly and -- and that seems like a good approach. I'm pleased to keep that option on the table. It seems like the standard for review and the decision whether to send it
up to the governor or not may be different for the two
paths. So it's -- it's -- I'm glad we're keeping our
options open.

MR. DENGEL: This is Rob Dengel. I would be
supportive of this approach as well knowing that maybe
we could separate.

CHAIR DREW: Okay. Thank you.

Any other comments? Thank you all.

We will -- hearing the comments from the Councilmembers,
we'll ask Staff to proceed with noticing the public
hearing on October 6th and opening the comment database.

I think that concludes our discussion on the
amendment.

Okay. Our next item on the agenda is
Columbia Generating Station and WNP-1/4 for a monthly
report from Mr. Whitehead.

MR. WHITEHEAD: Good afternoon. This is Kip
Whitehead from Energy Northwest. I'll be reporting on
the Washington Nuclear Project 1 and 4 and the Columbia
Generating Station. There are no nonroutine issues to
discuss for the month of August. Are there any
questions?

CHAIR DREW: Any questions?

Thank you. Hearing none, we will move to
our next item. It looks like that is adjournment. So
if there's no other business to come before us, thank you all for participation today, and this meeting is adjourned.

(Adjourned at 2:29 p.m.)
CERTIFICATE

STATE OF WASHINGTON
COUNTY OF THURSTON

I, Tayler Garlinghouse, a Certified Shorthand Reporter in and for the State of Washington, do hereby certify that the foregoing transcript is true and accurate to the best of my knowledge, skill and ability.

Tayler Garlinghouse, CCR 3358