



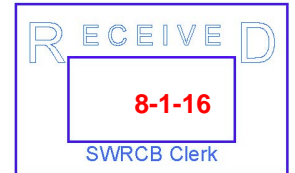
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August 1, 2016

VIA EMAIL
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State Water Resources Control Board
1001 I Street, 14th Floor
Sacramento, CA 95812-2000
Attn: Clerk of the Board



Subject: 8/2/16 BOARD MEETING – ITEM #6 (CONSIDERATION OF A PROPOSED ORDER ADDRESSING PACIFIC GAS AND ELECTRIC COMPANY’S PETITION FOR RECONSIDERATION OF THE WATER QUALITY CERTIFICATION ISSUED FOR THE DESABLA-CENTERVILLE HYDROELECTRIC PROJECT)

Dear Chair Marcus and Members of the State Water Resources Control Board:

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to provide comments on the Draft California State Water Resources Control Board Order WQ-2016-In the Matter of Petition for Reconsideration of Water Quality Certification for the PACIFIC GAS AND ELECTRIC COMPANY DESABLA-CENTERVILLE HYDROELECTRIC PROJECT FEDERAL ENERGY REGULATORY COMMISSION PROJECT NO. 803 (Proposed Order). PG&E generally supports the Proposed Order and respectfully requests some additional modifications and minor clarifications.

Table 2. Lower West Branch Feather River Minimum Flows

Footnote 1, of Table 2, states, “No diversion may occur until the minimum instream flows are satisfied, unless requested by the Operations Group and approved by the Deputy Director.” PG&E would like to recommend a revision to Footnote 1, of Table 2, which will allow for timely flow changes upon concurrence of the Operations Group and Deputy Director but will minimize delays in making those flow changes. PG&E believes that ensuring a timely diversion without potential delay is necessary to protect the resource and would be achieved with this revision:

“No diversion may occur until the minimum instream flows are satisfied, unless requested by the Operations Group and approved by the Deputy Director. **However, this requirement is superseded if language is incorporated into the annual Operation Plan that allows the Operation Group the flexibility to make flow changes and the Operations Plan is approved by the Deputy Director.**”

Mitigation Measure 3: Construction of the DeSabra Forebay Water Temperature Reduction Device

Mitigation Measure 3: Construction of the DeSabra Forebay Water Temperature Reduction Device is ambiguous and could easily be misinterpreted. For clarification, PG&E would like to recommend that Mitigation Measure 3 be revised as follows: The water temperature reduction device in the DeSabra Forebay will reduce water circulation and could cause a reduction in water quality. ~~PG&E is required to provide 1.175 cubic feet per second (cfs) flow to water users along the Upper Centerville Canal from the current release point in the forebay dam in the manner identified in the Butte Creek water rights decree¹. Neither this Mitigation Measure nor the water quality certification alters any rights or requirements of that decree.~~ A bypassed flow of at least 2 cfs ~~(a portion of which may also serve the water rights decree requirement)~~ shall be released into DeSabra Forebay at the upstream end of the temperature reduction device when in operation, providing some circulation through the forebay and reducing the risk of stagnation in the forebay pool. The circulation through the forebay would be further enhanced by operating the forebay at a lower elevation during the time when the temperature reduction device is operating to reduce retention time in the reservoir. Monitoring and reporting associated with this mitigation measure are required in the WQC plan outlined in Condition 9, DeSabra Forebay Water Temperature Improvements.

Pursuant to the Butte Creek water rights decree, PG&E may be ~~is~~ required to provide 1.175 cubic feet per second (cfs) flow to water users along the Upper Centerville Canal from the current release point in the forebay dam in the manner identified in the water rights decree¹. Neither this Mitigation Measure nor the water quality certification alters any rights or requirements of that decree. However, a portion of the bypassed flow of at least 2 cfs under this Mitigation Measure which may also serve the water rights decree requirement.

¹ Butte Creek Judgment and Decree, November 6, 1942.

Thank you for your consideration of these comments.

Sincerely,



Jim Gill, P.E.
Director, Hydro Licensing