upstream carryover storage under the NAA is no longer appropriate under CWF. In the NAA, a higher level of exports in the fall is appropriate, given the export restrictions in the spring. However, under the CWF, the greater ability to capture excess flows in the winter and spring, requires less movement of stored water in the late summer and fall as compared to the NAA. Using this strategy, it is possible to use the north-Delta-Diversion to both develop increased water supply and maintain upstream storage flexibility. To implement this view in the modeling, the Petitioners set San Luis rule curve lower during the fall and higher in the spring in their Alternative 4a, compared to their NAA.

In contrast, MBK's approach ignores the increased flexibility in winter and spring associated with the north-Delta-Diversion in the CWF in setting San Luis rule curves. In doing so, MBK's Alternative 4a rule curve encourages release and export of stored water in the fall to the same degree as in their NAA. This, in conjunction with their other discretionary actions to increase south of delta allocation goals, serves to unreasonably draw down upstream storage. MBK essentially uses the same rule curve for CVP under Alternative 4a as was used in the NAA

Based on my review of MBK's modeling, it is my opinion that MBK's implementation and application of the San Luis reservoir rule curve inadequately acknowledges the changes in operational flexibility that is afforded by the CWF, and that their prioritization of conveying upstream stored water overshadows the additional goals of CWF to maintain upstream storage flexibility.

II. III. Use of Joint Point of Diversion in Setting Allocations

Mr. Bourez states that "DWR/USBR BA Model includes artificial limits on the use of Joint Point of Diversion." [SVWU-100 2: 7 b) 2)]. He also states that, "This assumption tends to artificially and incorrectly keep modeled storage in NOD CVP reservoirs higher under DWR/USBR BA Alternative 4A as compared to the No Action Alternative." [SVWU-107, p. 2.] MBK's statements are misleading. As noted in Ms. Parker's testimony [DOI-33], removing the permitted capacity constraint on the JPOD wheeling capacity alone does not

change the petitioners modeling results presented in the Part 1A direct testimony.

In achieving their goals of lower upstream CVP storage under Alternative 4A compared to the No Action Alternative, in addition to removing the permitted capacity constraint from JPOD wheeling under Alternative 4A [SVWU-107 42: para 4], MBK changed the priority of the CVC wheeling and JPOD wheeling as stated here: "MBK Alternative 4A CVC wheeling logic alters the CalSim II logic to spread deliveries over the summer months, as opposed to concentrating deliveries in July, and to give priority to JPOD wheeling from July to September when it is needed to maintain CVP San Luis Rule Curve." [SVWU-107, pp. 41-42]. Further, MBK assumed that available JPOD wheeling capacity will be known during Mar-May when the allocations are set, and used this additional capacity to manually boost CVP SOD service contractor supply. [SVWU-100, p. 52.]

In justifying their changes related to JPOD, MBK speculates that JPOD wheeling capacity could be included in the CVP allocation process as a reliable means to convey CVP stored water, it could be used to boost CVP SOD allocations that SOD allocations are export capacity constrained. [SVWU100, pp. 41-42.]

However, as noted in Ms. Parker's testimony [DOI-33], it is not possible for Reclamation to include JPOD export wheeling capacity as part of the allocation setting process in Mar-May, given the uncertainty and unpredictability of the available Banks pumping plant capacity in the summer months.

III. III.4. The Sensitivity Analysis Isolates the Major Changes Between MBK and Petitioners' Modeling and Shows These Changes Were Discretionary

Exhibit SVWU-107, page 41 contains a bullet list for changes that MBK made to the petitioner's CalSim models to create their own CalSim model versions. The lists consists of 9 change categories for the No Action Alternative and an additional 8 change categories for Alternative 4A. MBK claims that their models with these changes show significantly different impacts than the petitioner's models. Through sensitivity studies it is shown that