

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

2 In achieving their goals of lower upstream CVP storage under Alternative 4A
3 compared to the No Action Alternative, in addition to removing the permitted capacity
4 constraint from JPOD wheeling under Alternative 4A [SVWU-107 42: para 4], MBK
5 changed the priority of the CVC wheeling and JPOD wheeling as stated here: “MBK
6 Alternative 4A CVC wheeling logic alters the CalSim II logic to spread deliveries over the
7 summer months, as opposed to concentrating deliveries in July, and to give priority to
8 JPOD wheeling from July to September when it is needed to maintain CVP San Luis Rule
9 Curve.” [SVWU-107, pp. 41-42]. Further, MBK assumed that available JPOD wheeling
10 capacity will be known during Mar-May when the allocations are set, and used this
11 additional capacity to manually boost CVP SOD service contractor supply. [SVWU-100, p.
12 52.]

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

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

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22 **III. III.4. The Sensitivity Analysis Isolates the Major Changes Between MBK and**
23 **Petitioners’ Modeling and Shows These Changes Were Discretionary**

24 Exhibit SVWU-107, page 41 contains a bullet list for changes that MBK made to the
25 petitioner’s CalSim models to create their own CalSim model versions. The lists consists of
26 9 change categories for the No Action Alternative and an additional 8 change categories for
27 Alternative 4A. MBK claims that their models with these changes show significantly
28 different impacts than the petitioner’s models. Through sensitivity studies it is shown that