

1 In contrast, MBK's method uses an input time series of export estimates in their model
2 The MBK time series is shown in Figure 5 below. For example, if the model is simulating
3 historical year 1984, the MBK method will utilize a specific, manually-derived export
4 estimate for that year. Such use of pre-determination, or unreasonable foresight related to
5 the outcome of the specific year, ignores the uncertainty that is used in actual operational
6 decision-making and in the Petitioner's CalSim II model. The MBK model is inconsistent
7 with standard modeling protocols. Unlike MBK's method, CVP and SWP operators, not
8 knowing the future, use conservative estimates for future conditions, resulting in reasonable
9 allocation that can be delivered.

10 Additionally, MBK disregarded its own export estimates for certain years to increase
11 south of Delta allocations. In Figure 6 every entry that shows 9999 is an example of where
12 MBK disregarded its own export estimate and manually bypassed the export estimate.
13 Note that the 9999 (or manual bypass) does not show up in MBK' No Action alternative
14 modeling, demonstrating an inconsistent implementation of discretionary decisions
15 between alternatives. (For detailed technical information on this topic please see DWR-
16 670)

17 Based on the July 15, 2015 joint review by DWR and Reclamation, the petitioners
18 concluded that MBK's use of discretionary actions (pertaining to San Luis Reservoir
19 operations and allocation logic) in their modeling is inappropriate for use in comparative
20 planning modeling for the CWF; the results produced involve too much advanced
21 knowledge of future conditions and cannot be justified in the context of real-time
22 operations. Furthermore, it is my opinion that these changes are not justified because they
23 induce bias between alternatives and it would be improper to incorporate them into this
24 comparative analysis for CWF.