



*Sent Via E-Mail to  
commentletters@waterboards.ca.gov*

October 26, 2012

GM 12-193

Charles R. Hoppin  
Chair, State Water Resources Control Board  
1001 I Street  
Sacramento, California 95814



**Re: Workshop 3, Comprehensive Review of the Bay-Delta Plan**

Dear Chair Hoppin:

The Sacramento Municipal Utility District (SMUD) is a consumer-owned electric utility created pursuant to the California Municipal Utility District Act, a political subdivision of the State, and a national leader in providing our customers with reliable and environmentally sustainable power. SMUD is a member of the Balancing Authority of Northern California (BANC), not a member of the California ISO. In addition to owning and operating its own hydro generation project, SMUD is both a Central Valley Project (CVP) power and water customer. SMUD has a major interest in the prudent management of CVP facilities and resources. SMUD has concerns when proposed projects, policies, and programs may modify the operations, management, and physical facilities of the CVP.

Our staff has been following the proceedings for the Comprehensive Review of the Bay-Delta Water Quality Control Plan (WQCP) by the State Water Resources Control Board (SWRCB) with great interest and submits the following comments as part of Workshop 3.

1. At this point in the WQCP process, it is difficult for SMUD to provide specific comments on the manner in which the SWRCB should update the WQCP. Some parties to the current proceedings have advocated that the WQCP include water quality objectives that would require substantially more water be devoted to environmental purposes. Other parties have advocated that the WQCP include water quality objectives that would require substantially less water be devoted to environmental purposes. Because hydropower operations are largely determined by water operations, SMUD believes that little can be said until the SWRCB has a better sense of the water quality objectives that will be included in the update of the 2006 Water Quality Control Plan.

John DiStasio, General Manager & Chief Executive Officer

2. The manner in which the SWRCB chooses to update the 2006 WQCP is very likely to have a large impact on hydroelectric power operations in California. Most of California's hydroelectric generation capacity is located on river systems that are within the Bay-Delta watershed. If the WQCP requires the Central Valley Project, the State Water Project or other hydroelectric projects to reoperate and release additional water to meet new water quality objectives, there are likely to be substantial impacts on hydroelectric generation and statewide electrical grid operation. However, as noted above, it is difficult – if not impossible – to discern what the effect will be at the present time.
  
3. Because it is premature for SMUD to offer specific comments at this time, SMUD respectfully requests that the SWRCB continue the current workshop until such time as the SWRCB can identify several different approaches to updating the WQCP. At such time, SMUD will be more than willing to discuss the advantages and disadvantages of those approaches. Indeed, SMUD is willing to assist SWRCB staff in the analysis of the impacts of those approaches on hydroelectric resources.

Please feel free to have your staff contact Steve Sorey of my staff at (916) 732-6521 if the SWRCB has any questions relating to this letter or the effects of the WQCP on hydropower resources.

Very truly yours,



John DiStasio  
General Manager and CEO

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cc: Corporate Files