



Power Generation

245 Market Street
San Francisco, CA 94105

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Mailing Address
Mail Code N13E
P. O. Box 770000
San Francisco, CA 94177

Via Email
(Meiling.Roddam@waterboards.ca.gov)

State Water Resources Control Board
Division of Water Rights - Water Quality Certification Program
Attn: Meiling Roddam
P.O. Box 2000
Sacramento, CA 95812

**RE: Comments on Draft EIR and Proposed Water Quality Certification
Amendment – PG&E's Pit 1 Hydroelectric Project, FERC Project No. 2687**

Dear Meiling:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the State Water Resource Control Board's (SWRCB) June 26, 2017 draft Proposed Amendment to the Water Quality Certification (WQC) and draft Environmental Impact Report (EIR) for the Pit 1 Hydroelectric Project (FERC No. 2687). In general, PG&E supports the SWRCB's proposed amendment to the Pit 1 401 certification, noting that as requested by the U.S. Fish and Wildlife Service, the amendment permanently eliminates summer flushing flows and confirms the October recreational flows ordered by FERC on June 14, 2011. PG&E has the following minor comments and clarifications.

Draft EIR - Project Description

On page x of the EIR's Executive Summary, the project description includes three components: water management, planned outage and unplanned outage. The paragraph addressing unplanned outages states the following:

"PG&E would minimize or avoid out-of-season pulsed flows in the Pit 1 Bypass Reach during unplanned outages by implementing new operational procedures. PG&E would reduce the maximum allowable operating limit on the Pit 1 Forebay by 0.5 foot (from 3,303.5 feet to 3,303 feet NGVD [3,323 feet to 3,322.5 feet PG&E datum]) during the summer, which would provide PG&E additional time to address the unplanned outage before having to spill from the Pit 1 Forebay."

PG&E requests that the reference to this proposed new operational procedure be deleted from the draft EIR. This proposed operational procedure has been eliminated from the latest Proposed Action in support of modification of the Project's Biological Opinion, which will be submitted to FERC on or before December 31, 2017. This procedural change has been eliminated because the data collected indicate that implementing this measure would not avert any unplanned outage spills during the summer months. The data supporting

this conclusion is included within the draft EIR in Section 2-4. Further, since the U.S. Fish and Wild Life Service requested a permanent suspension of flushing flows in 2009, no out-of-season spills have occurred at Pit 1 Forebay due to unplanned outages.

Finally, the reduction of the maximum allowable operating limit by 0.5 feet would restrict PG&E's operational flexibility, while not providing a meaningful mechanism to prevent out-of-season spills. This is true because reducing the maximum allowable operating limit by 0.5 feet would provide approximately 40 additional minutes before a spill would occur in the event of a two-unit outage, depending on the conditions at the time of the outage. During times of peak demand in the summer, PG&E may have several hours (even eight to ten hours depending on current inflow to the forebay) before needing to spill. The extra 40 minutes is not a meaningful increase.

Proposed Amendment to Pit 1 Water Quality Certification

The last paragraph of the proposed amendment includes the following language:

The State Water Resources Control Board reserves the authority to modify the conditions of the amended certification if monitoring results indicate that continued operation of the Pit 1 Project could impact water quality standards or in response to new information regarding the Shasta Crayfish.

PG&E would like to confirm that, by this language, the SWRCB's intention is to reserve the right to modify only the proposed amended language. This modification could occur if the required report summarizing the monitoring results, during the period flushing flows were suspended, provided new information regarding the Shasta Crayfish or the controlling of aquatic vegetation or mosquito production.

PG&E looks forward to working with the SWRCB in implementing the amended water quality certification. Should you have any questions, please contact PG&E License Coordinator, Sean Murphy, at (415) 973-5629, or Sean.Murphy3@pge.com.

Thank you,



Neil J. Wong
Supervisor, Hydro Licensing