



Power Generation

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April 6, 2015

Via Electronic Submittal (E-File)

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426-0001

**Re: Phoenix Project (FERC No. 1061)
Request for Variance for Lyons Reservoir at Gaging Station S-51**

Dear Secretary Bose:

Pacific Gas and Electric Company (PG&E) submits this request to the Federal Energy Regulatory Commission (FERC) for an instream flow variance for its Phoenix Project (FERC No. 1061). FERC granted PG&E a similar variance request on June 11, 2014. PG&E is requesting that this variance, at gaging station S-51, to begin as soon FERC grants approval and to run through October 15, 2015.

License Compliance

Per license Article 105, PG&E is required to consult with the California Department of Fish and Wildlife (CDFW) on issues regarding flow variation. PG&E has consulted with the CDFW, and through a series of email communications, the parties have come to an agreement on the proposed variance request. The emails between PG&E and CDFW are attached in Enclosure 1.

Background

On June 10, 2014 PG&E submitted a letter to FERC that identified the monitoring compliance points the CDFW, the California State Water Resources Control Board and PG&E agreed upon as PG&E's proposed monitoring plan. FERC then approved the variance with an Order that was issued on June 11, 2014 titled, "Order Extending Temporary Variance on Minimum Flow Requirements." This Order allowed PG&E to maintain a 3-cubic feet per second (cfs) minimum instream flow requirement at gaging station S-51.

Variance Request

Currently, Lyons Reservoir is at roughly 80 percent capacity with (4,200 acre feet). However, due to the ongoing drought conditions and historic low snowpack levels, the current conditions are even worse than 2014 when the "end-of-spill" at Lyons Reservoir

Kimberly D. Bose, Secretary
April 6, 2015
Page 2

finished on May 31, 2014. Historically, the end-of-spill period has typically occurred in July. Due to the historic low snowpack levels, current reservoir elevations are not expected to increase through the spring. Runoff in the watershed upstream of Lyons is expected to drop substantially, and the reservoir will be drawn down to maintain instream flow releases and meet the needs of downstream end users such as the Tuolumne Utility District (TUD).

PG&E respectfully requests a variance at gaging station S-51 to allow for a 24-hour average flow regime established with a target instream flow release of 3 cfs. Using the 24-hour average flow, as opposed to the license required 15 minute instantaneous flow, will allow PG&E to eliminate the need for a buffer flow in addition to the 5 cfs license required instream flow. Under normal license conditions, PG&E over-releases flows at gaging station S-51 in the range of 2 cfs, on top of the license required 5 cfs, for a total flow release of 7 cfs. In absence of the buffer flow, PG&E is able to bank an additional amount of water that is vital to the downstream end users.

Conclusion

This variance request is based upon an expectation of an unusually early end to spring/summer snowmelt and exceptionally low levels of runoff upstream of Lyons Reservoir through the summer, combined with an early end to spill conditions at Lyons Reservoir. PG&E wishes to ensure that these reduced water resources can be managed to meet the needs of downstream users and sustain ongoing instream flow releases into the beginning of the 2015-16 water year season.

If you have any questions concerning this matter, please call me at (415) 973-3082.

Sincerely,

A handwritten signature in blue ink that reads "Sharon A. Jewell for Ezra Becker".

Ezra Becker, License Coordinator
Power Generation

Attachment

cc: Attached List

Kimberly D. Bose, Secretary
April 6, 2015
Page 3

cc: Mr. Frank Blackett, Regional Engineer
San Francisco Regional Office
Federal Energy Regulatory Commission
100 First Street, Suite 2300
San Francisco, CA 94105-3084

Tom Scesa, General Manager
Tuolumne Utilities District
18885 Nugget Blvd.
Sonora, CA 95370

United States Department of the Interior, Fish and Wildlife Service
Sacramento Fish and Wildlife Office
Attn: Deborah Giglio
2800 Cottage Way
Sacramento, CA 95825

California Department of Fish and Wildlife
Attn: Linda Connolly
1234 E. Shaw Ave
Fresno, CA 93710

United States Department of Agriculture, Forest Service
Stanislaus National Forest
Attn: Beth Martinez
19777 Greenley Rd.
Sonora, CA 95370

State Water Resources Control Board
Attn: Jeff Parks
1001 I Street
Sacramento, CA 9581-2828

Central Sierra Environmental Resource Center
Attn: John Buckley
P.O. Box 396
Twain Harte, CA 95383

Enclosure 1
CDFW Consultation Emails

San Pedro, Maria

From: Becker, Ezra
Sent: Friday, April 03, 2015 4:31 PM
To: Connolly, Linda@Wildlife
Cc: Single, Jeff@Wildlife; Thoma, Alvin; Vance, Julie@Wildlife; Parks, Jeff@Waterboards; Gill, Jim; Fransz, Matthew D
Subject: RE: S-51 Gaging Station Variance Request on the S. Fork of the Stanislaus River

Hi Linda,

I am writing to confirm that PG&E agrees with your recommendations for the variance request that I laid out in the earlier email communication dated March 24, 2015. PG&E will conduct the VES surveys and submit these surveys through email communication within 30 days of their completion. PG&E will provide CDFW with a technical memorandum as requested, by March 31, 2016. This memorandum will be delivered hard copy and will go to the same parties a similar memorandum went to in a cover letter dated March 5, 2015.

At this time, PG&E does not expect to spill at Lyons Dam, however, there may be a late season storm that may trigger a spill event. The reservoir is currently at 4,200AF.

I will attach this string of email communications to the PDF of a draft letter that was provided in the earlier email communication dated March 24, 2015 and submit it for FERC's review. PG&E appreciates your timely response.

Thank you very much for your help in this matter,

Ezra

From: Connolly, Linda@Wildlife [mailto:Linda.Connolly@wildlife.ca.gov]
Sent: Monday, March 30, 2015 2:55 PM
To: Becker, Ezra
Cc: Single, Jeff@Wildlife; Thoma, Alvin; Vance, Julie@Wildlife; Parks, Jeff@Waterboards
Subject: RE: S-51 Gaging Station Variance Request on the S. Fork of the Stanislaus River

Hello Ezra,

Department of Fish and Wildlife (CDFW) staff have reviewed and discussed PG&E's FERC license variance request at gaging station S-51 and the related draft letter to FERC for the Phoenix Project, license No. 1061, and we have a few recommendations for the proposal.

Within the targeted 24-hour average flow release of 3 cubic feet per second (cfs) that is proposed, CDFW requests that a minimum instantaneous rate of 2 cfs be maintained.

In your email you indicate that the same monitoring regime would be implemented as proposed in 2014. Overall that is acceptable to CDFW, though CDFW requests a couple minor modifications to allow CDFW to understand pertinent aspects of the system during 2015 rather than a year following the modified conditions. CDFW requests that the visual encounter survey (VES) for all amphibian life stages be completed before May 31, 2015, and that the VES survey results and each of the water temperature measurements (taken at the same locations and with the same timing as in 2014) be submitted to CDFW within 30 days of each survey. Those results may be emailed directly to me or mailed to me in Fresno (address below), whichever is more convenient to PG&E. The remaining collected data may be submitted to CDFW by the proposed date of March 31, 2016, provided that CDFW receives the monitoring report (technical memorandum) at least two weeks before receiving any license variance request for gaging station S-51 during 2016.

CDFW also requests an update of whether PG&E currently anticipates that spilling from the dam during the spring will be included in its 2015 operations.

If you have any questions just let me know, we can schedule a call if needed.

Thanks,
Linda

Linda Connolly
Senior Environmental Scientist
Supervisor, Lake and Streambed Alteration Program
FERC Coordinator
Central Region
California Department of Fish and Wildlife
1234 East Shaw Avenue
Fresno, California 93710
(559) 243-4014 extension 242
Linda.Connolly@wildlife.ca.gov
www.wildlife.ca.gov

From: Becker, Ezra [<mailto:E1BH@pge.com>]
Sent: Tuesday, March 24, 2015 4:54 PM
To: Connolly, Linda@Wildlife
Cc: Single, Jeff@Wildlife; Thoma, Alvin; Vance, Julie@Wildlife; Parks, Jeff@Waterboards
Subject: S-51 Gaging Station Variance Request on the S. Fork of the Stanislaus River
Importance: High

Hi Linda,

As you know PG&E and California have seen another year of record setting dryness throughout the state. PG&E will be requesting a variance at S-51, which is below Lyons Dam on the South Fork of the Stanislaus River. According to license article 105 for FERC Project No. 1061, PG&E is required to consult with the California Department of Fish and Wildlife (CDFW) for all variances below Lyons Dam at gaging station S-51. PG&E is requesting the same variance as was requested last year, a 3 cfs 24-hour averaged flow regime that would last from the time the variance is approved until October 15, 2015. PG&E hopes to receive the approval from FERC shortly after CDFW's approval is received. In an effort to help this process along, PG&E proposes that it will follow the same monitoring regime as was agreed upon last year, with one minor change of submitting the technical memorandum by March 31, 2016. The monitoring regime which was agreed upon between Alvin Thoma of PG&E and Jeff Single of CDFW, by an email dated March 17, 2014 and then submitted to FERC by a letter dated March 17, 2014 (attached), explains the agreed upon conditions for last year's variance.

Upon receiving your permission through email, PG&E would like to submit the near complete letter, dated March 24, 2015 (attached), to signify CDFW's approval of PG&E's proposed variance at S-51. PG&E will take this email chain and submit it to FERC to gain their approval for the variance request.

Please let me know if there are any questions or concerns. PG&E respectfully requests a rapid turnaround for this pressing issue.

Thank you very much,

Ezra

Ezra Becker
Hydro License Coordinator
(415) 973-3082 office
(415) 205-7544 cell

Document Content(s)

PGE2015-04-06_Phoenix_VarianceRequestBelowLyons_S-51.PDF.....1-6