VIA FERC Service

Debbie Powell, Senior Director
Pacific Gas and Electric Company
P.O. Box 770000
San Francisco, CA 94177

Subject: Ramping Rate Deviation

Dear Ms. Powell:

This letter is in response to your December 23, 2019 filing, regarding review of your October 8, 2019 request for temporary variance of the ramping rate requirements in the North Fork Mokelumne River below Electra diversion at the Mokelumne River Project No. 137.

License Requirements

Ordering paragraph (D) of the project license incorporates the conditions submitted by the U.S Forest Service (Forest Service) under section 4(e) of the Federal Power Act, as set forth in Appendix A of the license.1 Forest Service condition 9 provides ramping rate requirements for various locations throughout the project.

Pursuant to the stated condition, you are excused from complying with the ramping rate requirements in the event of law enforcement or search and rescue activities, regulatory compliance, or equipment malfunction or failure that is directly related to providing the specified ramping rates. After such an event occurs, you must, within 10 days, provide notification to the Commission, the Mokelumne Ecological Resource Committee (ERC), and the Forest Service for areas within its jurisdiction.

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Background

In your October 8, 2019 request, you notified the Commission of a planned outage at the Electra powerhouse from October 1 until November 30, 2019, and proposed to implement a ramping rate variance, as measured at gage M-46 during the Electra powerhouse outage. Commission staff, in a letter issued November 27, 2019, noted that you filed the ramping rate variance request with the Commission on the day following its proposed commencement.\(^2\) The letter notified you that we would review your potential failure to comply with the requirements of condition 9 of the Forest Service conditions, and required you to file a report following the completion of the Electra powerhouse outage, addressing comments provided in the letter. Your December 23, 2019 filing is in response to the November 27, 2019 allegation of potential non-compliance with your project license.

In your December 23, 2019 filing, you indicate that because your Ramping Rate Variability Plan,\(^3\) eliminated gage M-46 as a license compliance point for ramping rates, your initial request for a ramping rate variance was actually not required. Per your Ramping Rate Variability Plan, gage M-46 was eliminated as the compliance point because it had been problematic for the purpose of gauging ramping rate operations. In your plan, you state that because flow adjustments are made at the Tiger Creek Afterbay dam, the new compliance point in that stream reach would be moved to gage M-59, downstream from the Tiger Creek Afterbay dam. However, as stated in your October 2019 variance request, due to the dredging operation that was ongoing at the Tiger Creek Afterbay, you were regulating the Tiger Creek Afterbay elevation by controlling flow through the West Point powerhouse. The West Point powerhouse is below compliance point M-59, therefore potential changes through the powerhouse would not be not measured by gage M-59.

Review

After reviewing the available information, we confirmed that gage M-46 was eliminated as the ramping rate compliance point for the stream reach in question. Although flow changes occurred as a result of your operation modifications, in accordance with your Ramping Rate Variability Plan, due to the fact that gage M-46 was eliminated as a ramping rate compliance point, no deviations from the ramping rate requirements as measured by the established compliance gages actually occurred throughout the duration of the requested variance period. Your December 23, 2019 filing

\(^2\) The delegated letter is available on the Commission’s eLibrary system (FERC Accession Number 20191127-3062).

\(^3\) The Ramping Rate Variability Plan required by Forest Service condition 9, was filed with the Commission March 31, 2009, and accepted by a Commission staff letter issued June 15, 2009.
also responds to comments Commission staff included in the November 27, 2019 letter, including an explanation for the late filing of the temporary variance proposal, an evaluation of the potential effects to kokanee salmon, and potential public safety concerns as a result of the ramp up. We reviewed your filing, and found the responses were adequate and appropriately addressed the concerns raised in our additional request for information. You also indicate in the report that you did not receive any comments or concerns from any resource agencies regarding the ramping rate changes at gage M-46. For these reasons, we will not consider the ramping rate changes and the events that occurred a violation of your project license. Please ensure that any future operation changes necessitating temporary variances from the requirements of your project license are coordinated with the resource agencies and the Commission in advance of the planned dates of project operation adjustments.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Korede Olagbegi at (202) 502-6268 or korede.olagbegi@ferc.gov.

Sincerely,

Kelly Houff
Chief, Engineering Resources Branch
Division of Hydropower Administration and Compliance