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FEDERAL ENERGY REGULATORY COMMISSION
Washington D.C. 20426

OFFICE OF ENERGY PROJECTS

Project No. 137-206—California
Mokelumne River Project
Pacific Gas and Electric Company

July 17, 2020

VIA FERC Service

Mr. Jan Nimick
Vice President, Power Generation
Pacific Gas and Electric Company
245 Market Street
Mail Code: N11E
San Francisco, CA 94177

Subject: Tiger Creek Flow Modification

Dear Mr. Nimick:

This is in response to your Tiger Creek flow modification notification, filed with the Federal Energy Regulatory Commission (Commission) on March 3, 2020 for the Mokelumne River Project No. 137. U.S. Forest Service (Forest Service) Section 4(e) Condition No. 5 requires that you release minimum flows from various project locations, including from Tiger Creek Regulator Dam, into Tiger Creek. Specifically, during March and April of critically dry water years, you are required to release 10 cubic feet per second (cfs) from Tiger Creek Regulator Dam. In addition, Condition No. 5 also states that minimum streamflow may also be temporarily modified for short periods in non-emergency situations after 5 days’ notice to the Ecological Resource Committee (ERC), the Commission, and upon approval of the U.S. Fish and Wildlife Service (FWS), California Department of Fish and Wildlife (CDFW), and as applicable, the Bureau of Land Management and the Forest Service for areas within its jurisdiction. You are also able to implement emergency flow reductions due to equipment malfunction or operating emergencies, followed by notification to the Commission, Forest Service, and the ERC within 10 days of occurrence.

You report that on March 23, 2020, you reduced flows from the Tiger Creek
Regulator Dam to adapt to changing and limited water conditions at the project. Specifically, you explain that the Tiger Creek Canal that feeds the reservoir was out of service for maintenance and that the only input was through natural inflow. You also explained that water demands through Amador Water Agency’s siphon had increased due to increased water demand as a result of Amador County’s shelter in place order. Finally, you state that the area is experiencing critically dry water conditions. Consequently, you explain that storage in the Tiger Creek Regulator Dam was decreasing at 0.83 feet per day. In order to maintain sufficient water storage for Amador Water Agency’s water needs, you opted to decrease flows in Tiger Creek to 5 cfs.

Prior to implementing the flow reduction, you state that you consulted with, and received approval from the CDFW and FWS. You also provided a voicemail message to the Forest Service in advance of the reductions. Due to diminishing storage, you also implemented the flow reduction prior to the established 5-day notification period. In addition, you provided email notification to the ERC after the reduction had been implemented. Based on cool ambient and water conditions, the timing of the reduction, and scale of the reduction, you conclude that there were unlikely to have been any significant adverse effects from the flow reduction. Finally, you state that you are expediting canal maintenance activities and would resume inflows into the Tiger Creek Regulator as soon as possible.

Review of your filing indicates that you opted to reduce flows into Tiger Creek, based on diminishing water storage behind Tiger Creek Regulator Dam. Your project license allows you some flexibility to implement short-term departures from the minimum flow requirements during both non-emergency and emergency situations. In these instances, you are required to consult with the applicable resource agencies as outlined in Condition 5. Your filing indicates that you followed the non-emergency protocols by communicating with the FWS and CDFW prior to the flow reduction but were initially unable to reach the Forest Service. However, you also provided an additional notification to the Forest Service and Ecological Resource Committee, following the emergency requirements of Condition 5. In a follow-up email, you provided flow data that indicated minimum flows resumed on April 15, 2020.

Commission staff have typically defined meeting domestic water needs under low storage conditions as constituting an emergency situation. Therefore, it appears that you followed the protocols for emergency flow reductions in Tiger Creek by consulting with the resource agencies and notifying the Commission. The flow reduction was also within the short-term provisions of the project license. Therefore, no additional action is required. As a reminder, in the event of a discretionary, non-emergency situation, you
are required to obtain approval from all applicable resource agencies at least five days prior to implementation. Further, if you plan to implement an extended flow variance in excess of 2-3 weeks in length, you must request and obtain Commission approval prior to its implementation.

Thank you for your cooperation. If you have any questions concerning this letter, please contact Mr. John Aedo at (415) 369-3335 or at john.aedo@ferc.gov.

Sincerely,

Thomas J. LoVullo
Chief, Aquatic Resources Branch
Division of Hydropower Administration and Compliance

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1 The Commission has defined a short-term flow variance as 2-3 weeks in length.