



July 11, 2018
E-Filing

Don Pedro Hydroelectric Project
FERC Project No. 2299-082
La Grange Hydroelectric Project
FERC Project No. 14581-002

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Subject: Don Pedro Hydroelectric Project, FERC Project No. 2299-082
La Grange Hydroelectric Project, FERC Project No. 14581-002
Filing of Additional Information Requested by FERC on July 3, 2018

Dear Secretary Bose:

On June 29, 2018, FERC's Project Manager for the relicensing of the Don Pedro Hydroelectric Project contacted HDR Engineering, Inc (HDR) by telephone to request certain additional computer modeling of both the licensees' and relicensing participants' proposals related to alternative future operations of the Don Pedro Project. The Projects' co-licensees, Turlock Irrigation District and Modesto Irrigation District (collectively, the Districts) filed an Amended Final License Application (AFLA) for the Don Pedro Project with FERC on October 11, 2017. Subsequent to FERC's issuance of a Ready for Environmental Analysis (REA) notice with respect to the AFLA on November 30, 2017, a number parties filed comments, recommendations, and preliminary mandatory conditions with FERC on January 29, 2018. On February 16, 2018, FERC issued to the Districts a request for additional information consisting of running alternative flow and non-flow proposals through the suite of models developed as part of the FERC relicensing process. The Districts filed this information on May 14, 2018. In his June 29, 2018 telephone call with the Districts' licensing consultant (HDR), the FERC Project Manager requested further modeling of alternative flow proposals. On July 2, 2018, the Districts' licensing consultant asked for further clarifications of the requested information and such clarifications were provided on July 3, 2018.

In accordance with the request for information, the following information is provided as part of this filing:

- Operations Modeling for the 1971-2012 period of the Districts' Preferred Plan (DPP-1r) without the operation of the infiltration galleries (IGs) proposed by the Districts to be installed and operated at RM 26. Table 5.6-2 of the Districts' AFLA contains a tabular breakdown of the Districts' proposed minimum instream flow releases without the IGs in operation. The Operations model was run using the Table 5.6-2 minimum flows for the case where the IGs are not operational.

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- Operations Modeling for the 1971-2012 period of The Bay Institute (TBI)¹ proposed flow alternative without the operation of the IGs. Although the IGs were not specifically part of the TBI proposal, the May 14, 2018 filing had included the IG operation. The model results provided herein remove the IGs from the TBI proposed flow alternative.
- Operations Modeling for the 1971-2012 period of the ECHO proposed flow alternative without the operation of the IGs. Although the IGs were not specifically part of the ECHO proposal, the May 14, 2018 filing had included the IG operation. The model results provided herein remove the IGs from the ECHO proposed flow alternative.

The Districts' have reviewed their prior filing of May 14, 2018, and can confirm that the SWRCB's flow proposal did not include any operation of the IGs when it was run through the full suite of models, including the reservoir and river temperature models and the two fish population models.

The Districts will run each of the above Operations Models through the Socioeconomics Model and file these results by July 18, 2018.

The Districts will also run the Operations Models for the above-referenced cases through the 3-D MIKE3 reservoir model of the temperature dynamics of the 2-million acre-foot Don Pedro Reservoir. Each modeling run requires seven to nine days to complete. The Districts' consultants are running each of the three reservoir temperature model runs identified above in parallel. The TBI and the ECHO flow proposals cause the Don Pedro Reservoir to be drawn down to very low levels for long periods of time, and this may cause a challenge for modeling the thermal dynamics of the reservoir. For this reason, the Districts feel that a reasonable filing date for the remaining suite of model runs for the three cases listed above is July 30, 2018. The Districts will file results as they are completed, if sooner than July 30.

If you have any questions, please do not hesitate to contact either of us.

Respectfully submitted,



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cc: Relicensing & Licensing Participants E-Mail Groups and Server Lists

¹ In FERC's July 3, 2018 Request for Additional Information, TBI's proposal was mistakenly attributed to the Bay Area Water Supply & Conservation Agency (BAWSCA). BAWSCA has not submitted a flow proposal.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service lists compiled by the Secretary in these proceedings, in accordance with Rule 2010 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.2010.

Dated at Washington, D.C., this 11th day of July, 2018.

/s/ Kimberly Ognisty

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