

From: [Melton, Jessica](#) on behalf of [Krausse, Mark](#)
To: katherine.walsh@waterboards.com; Johnson, Julie@Waterboards
Cc: [Jones, Kathleen \(Law\)](#); [Krausse, Mark](#); [Melton, Jessica](#); [Cunningham, Bryan](#)
Subject: DCPD OTC Interim Mitigation Fee 2017-2018
Date: Tuesday, January 15, 2019 4:35:07 PM
Attachments: [DCPD OTC Intake Volumes 2017-10 thru 2018-09.pdf](#)

Dear Ms. Johnson:

In response to your January 11, 2019 letter regarding the OTC interim mitigation fee requirements for Diablo Canyon Power Plant for October 2017 through September 2018, Pacific Gas and Electric Company would like to continue to use the site-specific interim mitigation fee for Diablo Canyon established for 2015-2016. The information requested to calculate the fee is attached and further background on the information is provided below.

Valid Entrainment Data

Data previously submitted for Diablo Canyon was used by the SWRCB's consultant to calculate a site-specific fee for the plant which was then used along with entrainment data from other OTC plants to calculate an average interim mitigation fee for facilities without site-specific data. This Diablo Canyon fee of \$3.12 MGD should be the starting point for determining the plant's fee.

Monthly and Total Intake Volume

Attachment 1 is the Plant OTC operational data for the October 2017 through September 2018 period formatted by month.

Actual Impingement Data

Diablo Canyon does not collect impingement data. It has long been recognized by the plant's technical work group and the Central Coast Regional Board that impingement is not an issue at Diablo Canyon. For the impingement portion of the interim mitigation fee, it is recommended that the Diablo Canyon impingement data included in the OTC policy SED be used, an average of 710 pounds per year.

We would be happy to meet with your team to discuss this information in more detail. If you have any questions, please give me a call.

Sincerely,

Mark Krausse
Director, State Agency Relations
916-995-6827

Pacific Gas and Electric Company
Diablo Canyon Monthly Intake Volume
October 01, 2017 – September 30, 2018

Month	OTC Intake Volume (MG)
October 2017	77,066
November 2017	74,580
December 2017	77,066
January 2018	77,066
February 2018	47,713
March 2018	51,970
April 2018	71,271
May 2018	77,066
June 2018	74,580
July 2018	77,066
August 2018	77,066
September 2018	74,298
TOTAL	856,808