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Karen Niiya
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Comments on Scope of Comprehensive Bay-Delta Plan Review

Dear Ms. Niiya:

The Northern California Power Agency (NCPA)¹ appreciates the opportunity to provide these comments in response to the *Supplemental Notice of Preparation and Notice of Scoping Meeting* (Supplemental NOI), issued on January 24, 2012, regarding the comprehensive review of the 2006 Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta) (Bay-Delta Plan), prepared by the State Water Resources Control Board (Board).

NCPA owns and operates a diverse portfolio of low-carbon resources to help meet the power supply needs of our member communities and districts. This portfolio includes hydroelectric generation plants along the North Fork of the Stanislaus River. As public agencies, NCPA's members also receive power generation from the Federal facilities in Northern California that make up the Central Valley Project, and would be directly impacted by any changes to the Bay-Delta Plan.

Any Proposed Revisions to the Bay-Delta Plan Must Consider the Impacts on Electricity Generation for Hydropower.

The Supplemental NOI describes the project as including "review of potential modifications to current objectives included in the 2006 Bay-Delta Plan, the potential establishment of new objectives, and

¹ NCPA is a nonprofit California joint powers agency established in 1968 to generate, transmit, and distribute electric power to and on behalf of its fourteen members: the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah; the San Francisco Bay Area Rapid Transit (BART), the Port of Oakland, the Truckee Donner Public Utility District, and two associate members: Placer County Water Agency, and the Plumas-Sierra Rural Electric Cooperative serving nearly 700,000 electric consumers in Central and Northern California.

modifications to the program of implementation for those objectives.”² (Supplemental NOI, p. 6) NCPA believes that the scope of this review must be comprehensive, and must include a review of how any changes or modifications to the current objectives will impact the hydroelectric generation facilities that are located within the Project Area. There is growing awareness at the legislature and emerging concerns regarding the energy related impacts of any changes in the Bay-Delta region and the State’s hydroelectric resources. With emerging concerns at both the federal and State level regarding the implications of any changes in the Delta-Bay Plan on the State’s energy goals, fully analyzing the impacts on hydropower generation should be a key consideration in this process.

The Bay-Delta Plan currently identifies beneficial uses of the Bay-Delta, and according to the Supplemental NOI, the Board is seeking comments on the “potentially significant environmental effects, reasonable alternatives, and mitigation measures related to potential changes to the 2006 Bay-Delta Plan, as identified in this comprehensive review.” (Supplemental NOI, p. 2) Due to the interrelated nature of the various uses of the Bay-Delta region, it is impossible to make any revisions to existing programs or elements without impacting the generation of electricity from the zero-greenhouse gas (GHG) emitting hydroelectric facilities located in the Project Area. Because these facilities are an integral part of California’s electricity generation portfolio (providing millions of megawatt hours of electricity to California residents and businesses each year), and make a significant contribution to facilitating California’s transition to lower overall emissions levels and the state mandated thirty-three percent renewable electricity portfolio standard, the potential detrimental impacts on these facilities must be addressed.

The Board Should Host a Scoping Workshop on Hydropower Impacts.

In a notice issued on April 24, the Board is proposing a series of workshops to inform this process. The Board has scheduled a workshop to address “the Analytical Tools for Evaluating the Water Supply, Hydrodynamic, and Hydropower Effects of the Bay-Delta Plan.” Since impacts on hydroelectric generation are not easily assessed, NCPA agrees that special consideration in the context of a separate workshop is warranted. To maximize the efficacy of such a workshop, however, the workshop must address the myriad complexities presented for hydroelectric generation facilities. For example, changes to flow criteria have direct impacts on the production of electricity, and could result in the loss of energy generation. Furthermore, since power plant efficiency changes with head and flow rates, it is imperative that these factors be fully modeled for all hydropower plants that would or could be impacted by any proposed changes. Impacts on resource adequacy must also be modeled and assessed, as changes in operating reserves also impact electricity system reliability and the provision of ancillary service. Potential impacts also extend to the delivery of other renewable resources, particularly zero-GHG wind

² The Supplemental NOI goes onto note that the proposed project “also includes potential changes to the monitoring and special studies program included in the 2006 Bay-Delta Plan. The proposed Project does not include amendments to water rights and other measures to implement a revised Bay-Delta Plan. A separate Environmental Impact Report will be prepared for these actions. As noted above, a separate SED is being prepared to address updates to the water quality objectives for the protection of southern Delta agricultural beneficial uses; San Joaquin River flow objectives for the protection of fish and wildlife beneficial uses; and the program of implementation for those objectives.” NCPA does not address the issues that slated for consideration under a separate EIR or SED, but urges the Board to also include impacts on hydroelectric electricity within the ambit of review for those separate items, as well.

and solar power. Accordingly, the loss of hydropower generation's capability to quickly respond to load and generation changes, and its ability to firm intermittent resources, must also be assessed.

NCPA urges the Board to ensure that the scope of these workshops fully address the potential impacts of any proposed revisions on the generation of electricity from these hydroelectric resources. The workshop should be attended by experts and advisors from entities currently operating hydroelectric generation facilities in the Project Area, as well as representatives from the State's electricity agencies. While these issues should also be addressed during the Scoping Meeting, currently scheduled for May 16, the range of impacts warrant a separate discussion that would allow stakeholders to thoroughly review the potential impacts and ensure that they are all clearly articulated for purposes of doing the further assessment of potential revisions to the Bay-Delta Plan.

Changes to the Current Bay-Delta Plan Must be Analyzed and Implemented in a Comprehensive Manner that Addresses the State's Aggressive Greenhouse Gas Emissions Policies.

Hydroelectric generation is an essential component of the State's emissions reduction strategies, as it is carbon-free and relatively low cost. Adverse impacts on hydroelectric generation impact not only the provision of this low-cost resource, but also have detrimental impacts on the ability of the State to firm intermittent renewable resources – such as wind and solar – which are a vital part of many utilities' renewable electricity portfolios. Impacting the generation of this clean and lower cost electricity will result in the need to utilize higher GHG-emitting and more costly resources. Reducing the ability to generate low cost electricity from hydropower during the times of greatest demand significantly increases electricity costs for California's utilities—and the millions of residential and business customers they serve. This would also be contrary to the express intent of Governor Brown and the Legislature, and undermine the significant investments that the State and stakeholders have made in emissions reduction measures and renewable energy projects, as hydropower is an essential tool in firming and shaping renewable resources and ensuring their deliverability to California's residents and businesses.

In the interest of sound policy for California, all energy impacts associated with any proposed changes to the Delta-Bay Plan need to be considered in order to achieve our shared goal of a successful plan that can achieve the State's goals and be supported and sustained in the years to come. To fully achieve and harmonize the State's environmental and electricity goals, it is important that the policies developed toward this end are based on a comprehensive approach that assures implementation of sustainable and effective revisions to the Delta-Bay Plan that are thoroughly analyzed and reviewed by all impacted and relevant agencies.

Sincerely,



Jane Dunn Cirrincione
Assistant General Manager
for Legislative and Regulatory Affairs