

July 12, 2018

Via Electronic Mail

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Re: Part 2 Rebuttal – Exhibit DWR-1217

Dear Mr. Mizell, Ms. Ansley, and Ms. Morris,

In DWR Part 2 Rebuttal Exhibit 1217, dated July 10, 2018, Metropolitan Water District of Southern California employee Chandra Chilmakuri addresses the Part 2 Testimony of Dr. Susan Paulsen submitted on behalf of the Sacramento Regional County Sanitation District (Regional San). In his testimony, Dr. Chilmakuri asserts:

As pointed out during DWR's cross-examination, SRCSD did not submit the underlying SRWTP operations model that was used to generate the results that form basis of Dr. Paulsen's opinion. At request of DWR, SRCSD agreed to provide the SRTWP operations model along with

James "Tripp" Mizell  
Jolie-Ann Ansley  
Stefanie Morris  
Re: Part 2 Rebuttal – Exhibit DWR-1217  
July 12, 2018  
Page 2

detailed inputs, outputs and assumptions and any evidence of independent review of this model during the cross-examination. (Transcript Volume 20, page 59.) *However to date, SRCSD has failed to provide this information.* (Exhibit DWR 1217, p. 18:16-21, emphasis added)

As shown by the attached correspondence, on April 16, 2018, our office provided each of you with the information requested during DWR's cross examination. Regional San went to considerable effort to provide you, nearly three months ago, with the information you requested. Dr. Chilmakuri's assertion that Regional San failed to provide the requested information is simply not correct.

Sincerely,



Kelley M. Taber

Enclosures

cc: Hearing Chair Tam Doduc (*Via Electronic Mail*)  
Co-Hearing Chair, Felicia Marcus (*Via Electronic Mail*)  
CWF Service List (*Via Electronic Mail*)

KMT:mb

# **ATTACHMENT 1**

# Follow up to DWR requests for underlying data in CWF hearing

Mizell, James@DWR <James.Mizell@water.ca.gov>

Fri 3/23/2018 1:15 PM

To: Paul Simmons <psimmons@somachlaw.com>;

Cc: Jolie Ansley <jsansley@duanemorris.com>; Stefanie Morris <smorris@swc.org>;

Hi Paul,

As we discussed at the hearing today (3/23/2018), I'm listing for your reference the types of detail that DWR is seeking in the modeling underlying Sac Regional County Sanitation District's Part 2 testimony referred to as the ESB modeling runs.

Modeling data files  
Mat Lab script files  
Calculation spreadsheets  
Analytical spreadsheets  
Calibration and validation reports  
Peer/independent review technical reports

Please do me the favor of providing your response to all the addressees on this email.

-Tripp Mizell  
Sr. Staff Counsel  
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California Department of Water Resources

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This email is confidential and may be subject to confidentiality rules under the attorney work product or attorney client communication privileges. If you have received this email in error, please inform the sender and delete it.

# **ATTACHMENT 2**

**From:** [Michelle Bracha](#)  
**To:** [Kelley Taber](#); [Mizell, James@DWR](mailto:Mizell.James@DWR)  
**Cc:** [Paul Simmons](#); [Kristian Corby](#); [Jolie-Anne S. Ansley](#); [Stefanie Morris](#)  
**Subject:** RE: WaterFix: Documents Requested During Cross Examination of Regional San Part 2 Witness  
**Date:** Monday, April 16, 2018 2:57:00 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Good afternoon,

As discussed below, a link has been sent so that you may access the files through the Hightail website. Please contact me if you have any problems accessing the documents.

Best regards,

Michelle



**Michelle Bracha** | *Legal Secretary*

500 Capitol Mall, Suite 1000 | Sacramento, CA 95814  
**Office** 916.446.7979 | **Direct** 916.469-3816 | **Fax** 916.446.8199 |  
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**From:** Kelley Taber  
**Sent:** Monday, April 16, 2018 2:29 PM  
**To:** Mizell, James@DWR <James.Mizell@water.ca.gov>  
**Cc:** Paul Simmons <psimmons@somachlaw.com>; Kristian Corby <kcorby@somachlaw.com>; Michelle Bracha <mbracha@somachlaw.com>; Jolie-Anne S. Ansley <JAnsley@duanemorris.com>; Stefanie Morris <smorris@swc.org>  
**Subject:** WaterFix: Documents Requested During Cross Examination of Regional San Part 2 Witness

Dear Tripp:

Pursuant to your request during cross examination of Dr. Susan Paulsen on March 23, 2018 and follow up email to Paul Simmons, we will be sending you, Ms. Ainsley and Ms. Morris via separate link a set of files that are responsive to your request. The package will include a cover letter describing the model codes, input and output files, and a timeline/history of the development of the codes and the peer review processes over time.

Please note that this package does not include "calculation spreadsheets" or "analytical spreadsheets," since Exponent and Flow Science did not use spreadsheets in the evaluation of ESB capacity and diversions.

Please let me know if you have any questions.



**Kelley Taber** | *Attorney*

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# **ATTACHMENT 3**



**From:** Hightail  
**To:** [Michelle Bracha](#)  
**Subject:** File Delivered: WaterFix: Documents Requested During Cross Examination of Regional San Part 2 Witness  
**Date:** Monday, April 16, 2018 2:54:19 PM

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## Your files have been sent!

Good afternoon, The attached files are sent on behalf of Kelley Taber. If you have any questions or wish to discuss this matter further, please contact Ms. Taber directly.

### 3 files were delivered to the following recipients:

*James.Mizell@water.ca.gov*

*psimmons@somachlaw.com*

*smorris@swc.org*

*ktaber@somachlaw.com*

*kcorby@somachlaw.com*

*mbracha@somachlaw.com*

*JSAnsley@duanemorris.com*

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