

OPERATIONS REBUTTAL TESTIMONY



ALLOCATION

Variables Include:

- Current and Projected Storages
- Forecasted Runoff
- Required Feather River flows (FERC, NMFS, DFW)
- Feather River Settlement Contractor Delivery
- Anticipated Depletions, Valley and Delta
- Anticipated Delta Outflow and Salinity Objectives
- Anticipated Export Restrictions per BiOps
- Contractor Delivery Requests



ALLOCATION

- Uncertainty exists after final Allocation
 - Runoff forecast is very uncertain
 - Example:
 - Feb. 2012 Bulletin 120 3.3 MAF of uncertainty
 - May 2012 Bulletin 120 665 TAF of uncertainty
 - Degree of Export Restrictions per BiOp
 - Exact Amount of Water Necessary to Meet D-1641



ALLOCATION

- Projects use conservative assumptions for planning future operations
 - Drier end of Bulletin 120 forecast range
 - Less than minimum BiOp export restriction range
- Projects operate to real-time conditions
 - Additional storage, if any, used for project purposes following year



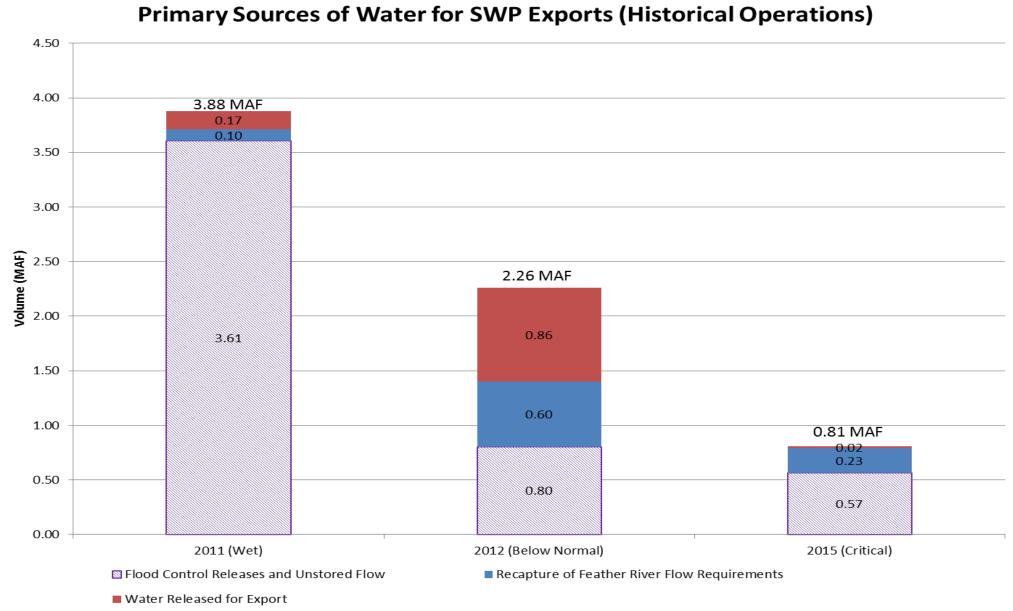
SOURCE OF WATER FOR EXPORT

1. Flood Control Releases and Unstored Flow

2. Recapture of Feather River flow requirements

3. Water Released for Export







PRIMARY REASON FOR RELEASES FROM LAKE OROVILLE

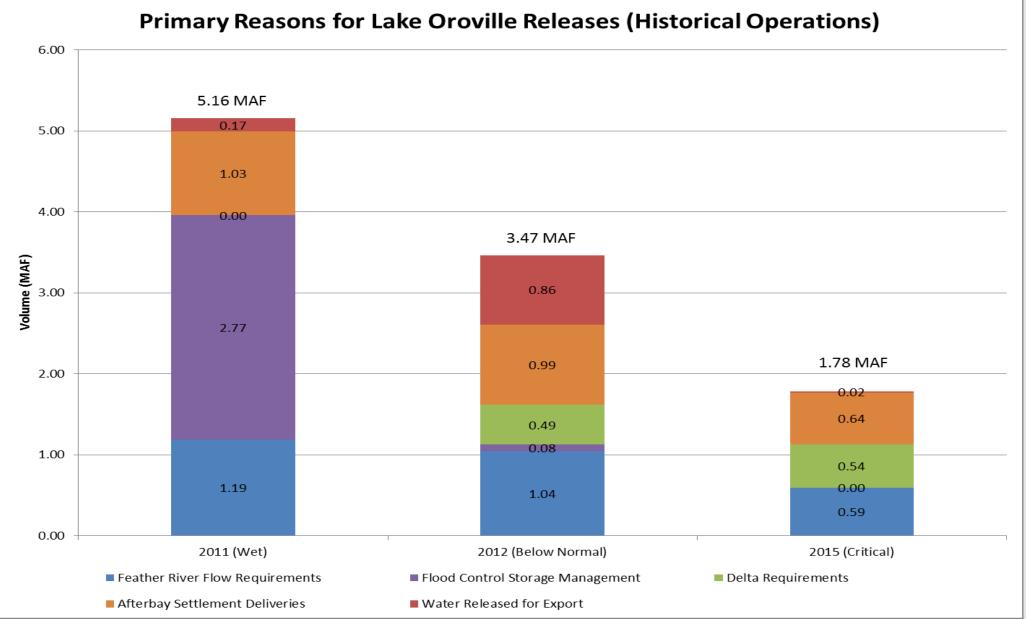
1. Regulatory and other Obligations:

- Feather River Flow Requirements
- Flood Control Storage Management
- Delta Requirements
- Afterbay Settlement Deliveries

2. Discretionary:

Water Released for Export



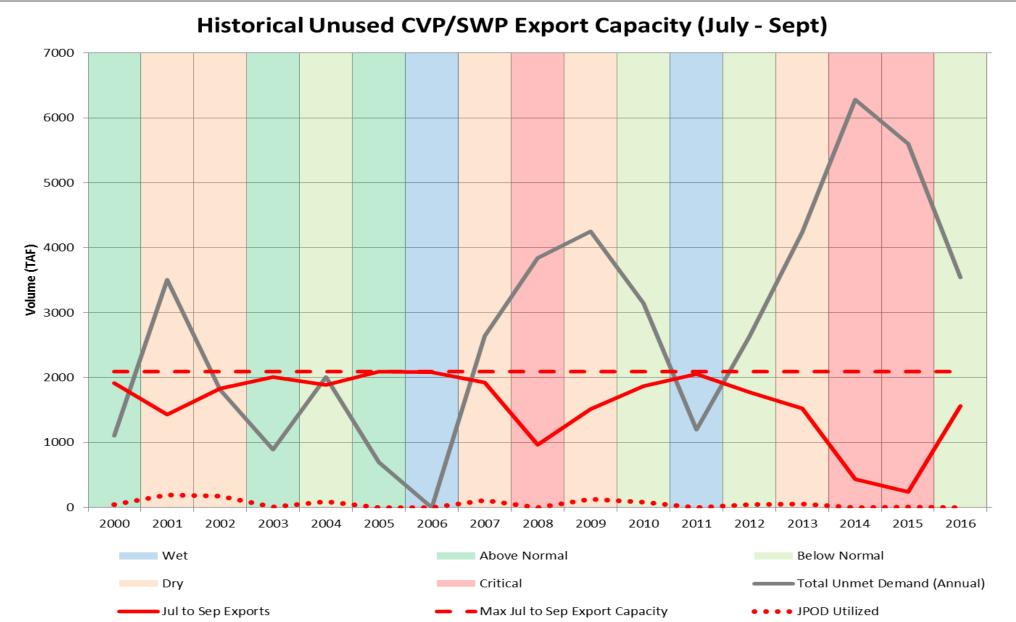




USE OF EXISTING PUMPING CAPACITY

- Historical Jul to Sep export capacity indicates:
 - Full export capacity used only in wetter years
 - In average to drier years:
 - Significant amount of unused capacity remains
 - Capacity for JPOD is available used sparingly
 - Demand left unmet
 - Projects actively limit amount of stored water for export







INCREASED OPPORTUNITIES TO CAPTURE EXCESS FLOWS AS A SUBSTITUTE FOR STORED WATER WITH CWF

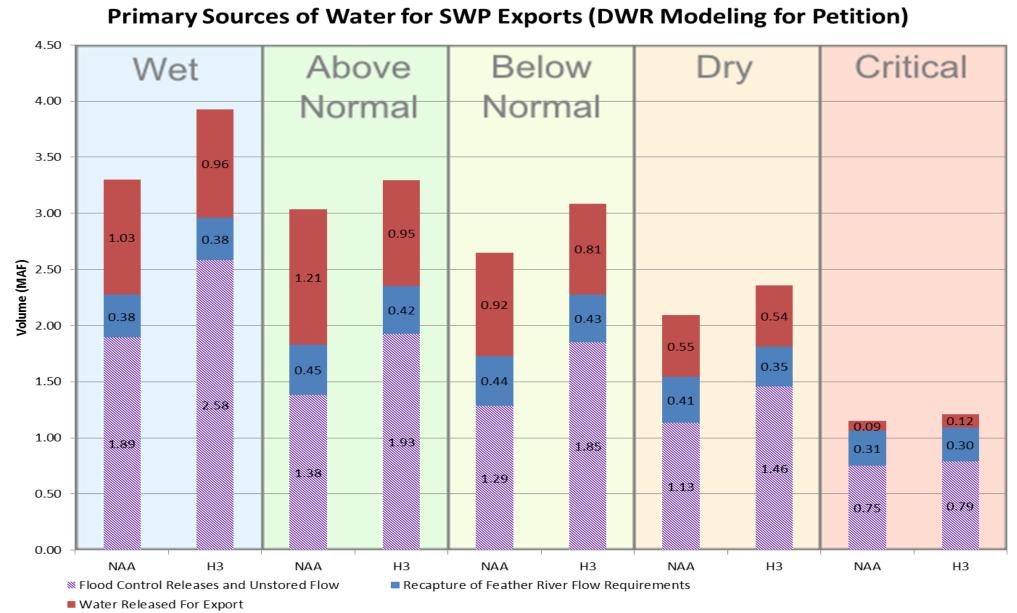
Petitioners modeling

- Increased reliance on unstored flow
- Decreased reliance on stored releases
- Consistent with SWP policy

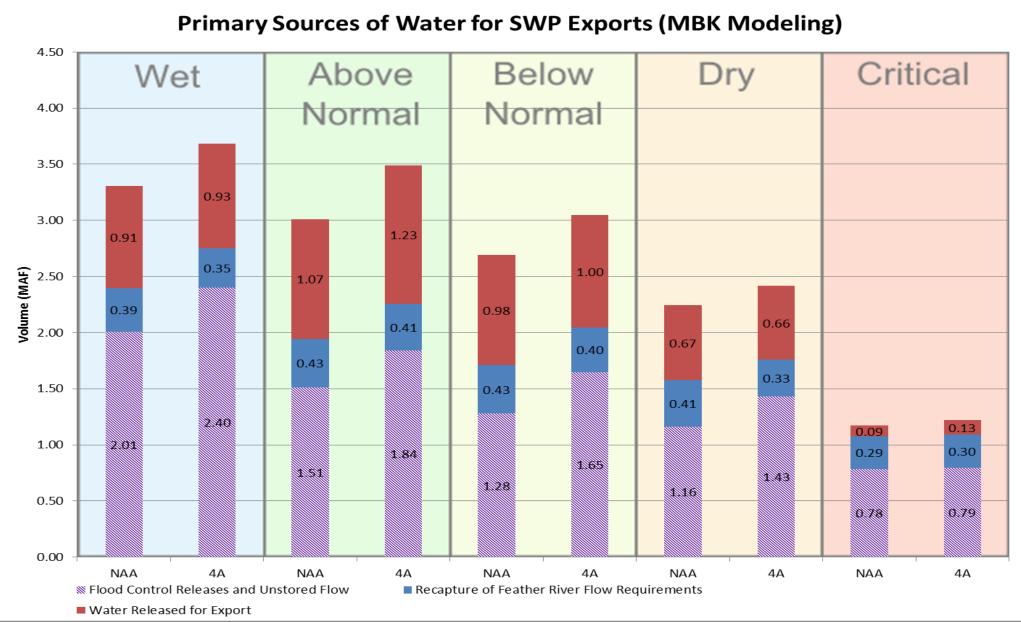
MBK modeling

- Increased reliance on both stored releases and unstored flow
- Aggressive use of stored water inconsistent with SWP policy









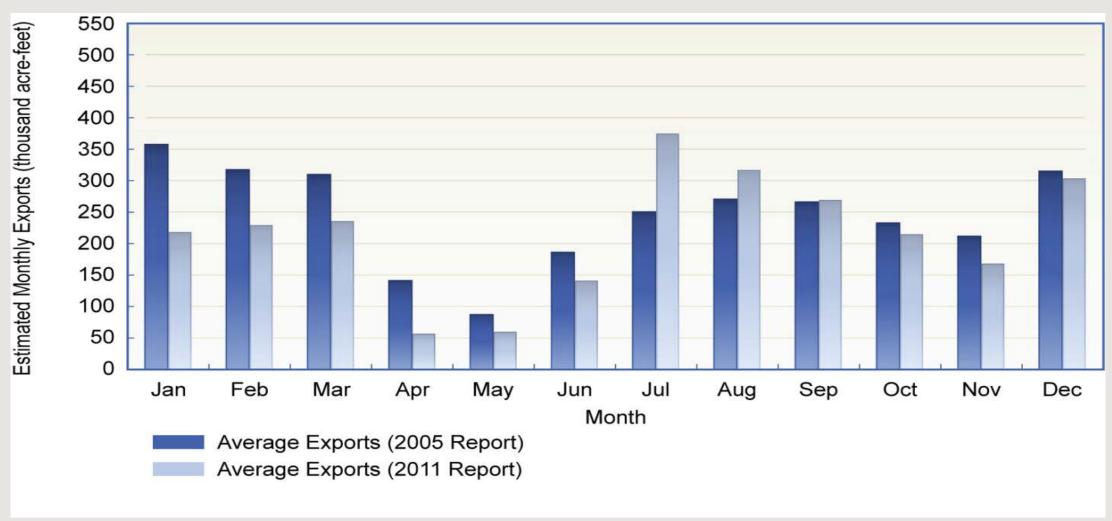


INCREASED OPPORTUNITIES TO CAPTURE EXCESS FLOWS AS A SUBSTITUTE FOR STORED WATER WITH CWF

- Pre-BiOps (prior to 2008)
 - Ability to capture some spring runoff events for beneficial uses
- Post-BiOps (2008 to present)
 - Exports during the spring severely limited by OMR restrictions
- CWF will return some pre-existing ability to export excess flows



AVERAGE MONTHLY SWP EXPORTS (PRE AND POST BIOPS)



Source: http://baydeltaoffice.water.ca.gov/swpreliability/FINAL_2011_DRR.pdf



DIFFICULTIES IN MEETING STANDARDS IN SOME YEARS

- TUCPs are rare and are only implemented under extreme conditions
- Last years 2013 to 2015 were extreme:
 - 2013: lowest precipitation on record
 - 2014: warmest on record
 - 2015: the lowest snow pack on record
 - TUCPs were one of several emergency management actions taken to balance shortages among beneficial uses



INCREASED EFFICIENCY OF DELTA FLOW REGIME WITH CWF

Cross Delta Flow

 Required to meet D1641 water quality standards in central and south Delta

Negative OMR Flow

 Required to meet D1641 water quality standards at CCWD and other M&I locations

Negative Western Delta Flow

- Source of salinity intrusion for the central Delta
- Caused by heavy south Delta pumping
- Countered with increased Delta outflow



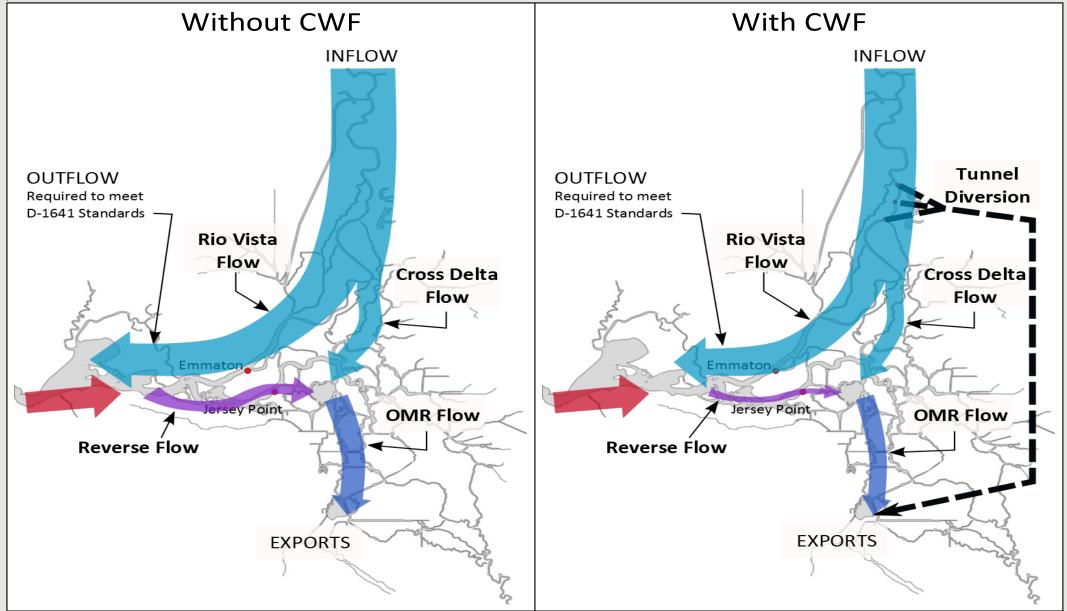
INCREASED EFFICIENCY OF DELTA FLOW REGIME WITH CWF

Operations with CWF

- Require continued export out of south Delta to maintain interior water quality
- Allow for higher export rates without increasing reverse flows in western Delta
- Allow capture of storm events
- The core hydrodynamics in the Delta will not change



DELTA HYDRODYNAMICS





TERM 91 NOT EXPECTED TO CHANGE WITH CWF OPERATION

Term 91 is a condition determined by SWRCB where:

 In-basin uses and Delta water quality are exceeding the available natural flows and must be supplemented by project storage



TERM 91 NOT EXPECTED TO CHANGE WITH CWF OPERATION

- In-basin use is not expected to change with the CWF
- Changes in Delta requirements are expected to limit project diversion out of the south Delta
- The frequency of Term 91 is not expected to change