

ADDITIONAL INFORMATION

Water Resources

1. *In section E2.2.4 of your environmental report, you present unimpaired flow data for the Old Cow and South Cow creeks. You state that you adjusted measured flows at the Cow Creek near the Millville gage for diversions in the watershed by adding a consumptive use estimate to the measured flow. As stated in your report, the consumptive flows that you estimated would not be restored to the respective channels as a result of decommissioning. Therefore, please provide estimates of historical flow conditions without adjusting for consumptive uses. Please provide tables similar to those in Appendix E that include estimates of flows in the bypassed reaches without adding back in the consumptive uses as described in your report. In addition, please provide a historical record of average monthly flows diverted for power generation, which would no longer be diverted under your proposal. Although an exact record may not be available, an estimate could be made using estimated flows, diversion capacity, powerhouse generation converted to flow, or other available data. Please include a description of how these flows were estimated and calculated.*

RESPONSE – Water Resources Item 1, Non-Adjusted Flows:

Kilarc Bypass Reach (Old Cow Creek)

The estimated unimpaired monthly flow (i.e., the estimate of historical flow conditions) for each year and month of the modeled period of record (1950–2000) on Old Cow Creek at Kilarc Diversion is shown in Table 1 (Attachment A). This is the flow anticipated at the current point of diversion after PG&E’s decommissioning, and does not include any adjustment for consumptive use downstream of Kilarc Diversion. Any non-Project consumptive uses that occurred upstream of the bypass reach during the period of record would be reflected in the estimates provided. However, no significant consumptive uses occur upstream of Kilarc Diversion. As such, the anticipated future flows after decommissioning should be unaffected by any non-Project water uses. Therefore, Table 1 in Attachment A is identical to “Estimated Monthly Unimpaired Flow (cfs) For Old Cow Creek” provided in the License Surrender Application (LSA) (Appendix D, Table 1).

South Cow Creek Bypass Reach (South Cow Creek)

The estimated unimpaired monthly flow (i.e., the estimate of historical flow conditions) for each year and month of the modeled period of record (1950–2000) on South Cow Creek at the South Cow Creek Diversion is shown in Table 2 (Attachment B). This is the flow anticipated at the current point of diversion after PG&E’s decommissioning, and does not include an adjustment that adds a consumptive use estimate.

RESPONSE – Water Resources Item 1, Historical Record of Average Monthly Flows:

Kilarc Development

The Kilarc Main Canal has a capacity of 52 cubic feet per second (cfs) and a length of 3.65 miles, with approximately 2.03 miles of earthen canal. Flow records from the head of the canal

near Kilarc Diversion represent water diverted prior to any potential losses in the canal (e.g., leaks or seepage, evaporation). Attachment C, Kilarc Main Canal Gage CB2, presents monthly average flows measured at gage CB2, located near the head of the canal (but downstream of the minimum instream flow release back to Old Cow Creek), for Water Years 1968/1969 through the beginning of 2009/2010.

At times, flow data exceeded the canal's capacity. Flows exceeding the canal's capacity would have flowed through a spill channel downstream of the gage, returning to the stream. For example, in December of Water Year 1995/1996, monthly flow averaged approximately 168 cfs, indicating that a portion of that month's flow would have been returned to the stream. The streamflow gages operated by PG&E that are not used for compliance are not typically rated to U.S. Geological Survey standards, and gaps exist in the dataset. However, the data presented here are likely to be the best available information for flows diverted from Old Cow Creek over the period of record.

To supplement this record, Attachment D presents graphical records of flow data for July and August (i.e., low-flow period) for 5 years (2005 through 2009) through Kilarc Powerhouse. Each major vertical axis represents 1 day. These flows are based on a calculation of powerhouse generation converted to flow and, therefore, would be expected to differ from flows recorded at Gage CB2.

Cow Creek Development

South Cow Creek Main Canal has a capacity of 50 cfs and a length of 2.06 miles. Approximately 1.9 miles are unlined. Flow was monitored near the head of the canal near the diversion. Flow records from the head of the canal, representing flows that are diverted near the diversion dam, are most representative of diversions prior to potential losses through the canal. Attachment E, South Cow Creek Main Canal Gage CB8, presents monthly average flows at Gage CB8, located near the head of the canal, for Water Years 1968/1969 through 1995/1996. Gage CB8 was out of service after that time.

At times, flow data exceeded the 50-cfs capacity of the canal, particularly during the rainy season. Flows exceeding canal capacity would have flowed through a spill channel downstream of the gage, returning to the stream. The streamflow gages operated by PG&E that are not used for compliance are not typically rated to U.S. Geological Survey standards, and gaps exist in the dataset. However, the data presented here are likely to be the best available information for flows diverted from South Cow Creek over the period of record.

To supplement this record, Attachments F-1 through F-5 present graphical records of annual flow data (January through December) for 5 years (2005 through 2009) through Cow Creek Powerhouse. Each major vertical axis represents 1 week. These flows are based on a calculation of powerhouse generation converted to flow and, therefore, would be expected to differ from flows recorded at Gage CB8.

- 2. There are inconsistencies in the data and units in reported metals data included in Tables E.2.4-5 and E.2.4-6, Appendix I, and Appendix N. For example, Table E.3.4-1 in Appendix N*

lists units as mg/L, whereas Tables E.2.4-5 and E.2.4-6 list units as µg/L for apparently the same values. Also, Table E.2.4-5 lists the maximum total copper concentration in the Kilarc Development as 0.011, whereas Table E.3.4-1 lists eight concentrations higher than this. Please verify that units in Tables E.2.4-5 and E.2.4-6 are correct or provide revised tables and associated text.

RESPONSE – Water Resources Item 2:

After review of the aforementioned items, as well as text within the technical memorandum (Appendix N) and the main body of the LSA, the following errata pages are attached. It should be noted that the results and discussion/conclusions based upon copper concentrations did not change, as the units in Appendix N, Table E.3.4-1 were typographical errors.

- Volume 1, Table E.3.4-1 (Attachment G): Table title was changed to “Summary of Copper Water Quality in the Kilarc and Cow Creek Developments,” and subheaders for each development were added.
- Volume 4, Appendix N, Table E.3.4-1 (Attachment H): Units were corrected from mg/L to µg/L. Data from Cow Creek Development were removed.
- Volume 1, Table E.2.4-5 (Attachment I): The maximum value for total copper was corrected from 0.077 to 0.62 µg/L. The title of the table was corrected to reflect the sampling month of March, versus the printed month of May.
- Volume 1, Table E.2.4-6 (Attachment J): The title of the table was corrected to reflect the sampling month of March, versus the printed month of May.
- Volume 4, Appendix N (Attachment H): The word “Draft” was removed from the title.
- Volume 4, Appendix N (Attachment H), Technical Memorandum: Page 3 of 10, second-last sentence of third paragraph states: “The average copper concentration from samples K-II and K-IIb (55µg/L) was selected as a conservative estimate....” Units of measurement were changed in text of this sentence from µg/L to mg/kg.
- Volume 4, Appendix N (Attachment H), Technical Memorandum: Page 3 of 10, last sentence of third paragraph states: “The K1 total copper concentration of 819 µg/L was assumed for the silt clay fraction.” Units of measurement were changed in text from µg/L to mg/kg.
- Volume 4, Appendix N (Attachment H), Technical Memorandum: Table 2.4.5-5 (partial) max copper concentration changed from 0.077 µg/L to 0.62 µg/L.
- Volume 4, Appendix N (Attachment H), Technical Memorandum: page 4 of 10 previously stated: “The background concentration of copper was assumed to be equal to the copper concentration measured in samples collected in May and October 2003” and was changed to “The background concentration of copper was assumed to be equal to the copper concentration measured in samples collected in March and October 2003.”

3. *In section E3.2.3: Evaluation of Water Rights and Use, you state that you are consulting with water users potentially impacted by the cessation of artificial flows to Hooten Gulch regarding the development of options for alternate points of diversion. Please provide the status of that consultation including, at a minimum: any alternatives identified and/or discussed; the associated costs of the alternative(s); the persons you have been consulting with including the documentation of consultation, as appropriate; what, if any, impact the alternative(s) could have on your decommissioning proposal (including potential schedule changes, additional environmental benefits or impacts, etc); if consultation is ongoing, details on how consultation will proceed and a timeline for completing consultation.*

RESPONSE – Water Resources Item 3:

In 2007, PG&E initiated its most recent outreach to the Abbott Ditch Users and to Steve Tetrick (collectively, “Water Users”) regarding the cessation of flows in Hooten Gulch upon Project decommissioning.¹ On August 23, 2007, PG&E met with the Water Users in Palo Cedro, California, and the parties agreed upon a path for future discussions. Specifically, the Water Users committed to provide PG&E with a list of locations of potential diversion points in South Cow Creek that could supply water to the Water Users after Project decommissioning (although the Water Users have been diverting water from Hooten Gulch, their adjudicated state water rights allow them to divert water only from South Cow Creek). In return, PG&E committed to hiring a consultant to conduct a preliminary feasibility study of the locations proposed by the Water Users.

On September 18, 2007, prior to the preparation of the list of potential future diversion points by the Water Users, legal counsel for Mr. and Mrs. Steve Tetrick sent a letter to PG&E setting forth the Tetricks’ legal position regarding the future cessation of flows in Hooten Gulch. On September 26, 2007, the Abbott Ditch Users’ legal counsel sent a letter to PG&E setting forth the Abbott Ditch Users’ legal position regarding the future cessation of flows in Hooten Gulch. In response, on October 17, 2007, PG&E wrote to the Abbott Ditch Users and Mr. and Mrs. Steve Tetrick reiterating its understanding of the agreed path for future discussions (as agreed upon in the August 2007 meeting) and stating PG&E’s legal position regarding the assertions contained in the Water Users’ letters.

In December 2007, PG&E met with the Water Users’ legal counsel in Sacramento to discuss the decommissioning further. By letter dated December 13, 2007, PG&E received from Steve Tetrick a list of three potential future diversion points in South Cow Creek. On February 26,

¹ PG&E began initial outreach to the Water Users in 2004. *See* Pacific Gas and Electric Company’s Reply to Motions to Intervene; Comments Opposing Surrender and Decommissioning of Project as Proposed; Motion for Imposition of Terms and Conditions Necessary for Surrender Approval and to Allow Continued Operation of the Kilarc-Cow Creek Project, or in the Alternative, for Full Evaluation of the Decommissioning Alternatives, Including Retention of the Existing Kilarc-Cow Creek Hydroelectric Project Facilities as a Reasonable and Preferred Alternative, in the Public Interest; and Recommendations for Terms and Conditions of License Surrender of Tetrick Ranch, Abbott Ditch Users, and Shasta County, pp. 16-17 (August 20, 2009), Available at *eLibrary*, Accession No. 20090820-5112.

2008, PG&E, PG&E's consultant, and the Water Users conducted a site visit to two of the three potential locations in South Cow Creek (the third proposed location was inaccessible). On May 9, 2008, PG&E provided the Water Users with a preliminary feasibility study analyzing the potential diversion points.²

After additional discussions, the parties agreed to execute nondisclosure agreements before moving forward. On December 10, 2008, PG&E and Steve and Bonnie Tetrick executed a nondisclosure agreement governing future discussions regarding the Tetricks' legal assertions. On March 31, 2009, PG&E and the Abbott Ditch Users executed a nondisclosure agreement governing future discussions regarding the Abbott Ditch Users' legal assertions.

On July 13, 2009, the Water Users filed with FERC a pleading further arguing their legal positions and proposing an alternative to decommissioning that would, if adopted, render the need for a new diversion point moot.

The Federal Power Act reserves to the states jurisdiction over matters pertaining to water rights.³ Therefore, PG&E has considered the relocation of the Abbott Diversion as not appropriate to be addressed in this license surrender proceeding.⁴ Consequently, the selection and ultimate construction of an alternative diversion location, wherever it is, will not have an impact on PG&E's decommissioning proposal since such construction will be subject to a separate state authorization and permitting process with associated environmental review.

As discussed in the LSA, it is PG&E's intent to continue consulting with the Water Users. However, it is difficult to provide a timeline for completing consultation in part because it remains uncertain whether the Water Users' alternative proposal will be further considered and possibly implemented. As noted above, if it is considered and implemented, the Abbott Diversion will not need to be relocated.⁵ To the extent the Commission approves PG&E's decommissioning proposal, consultation will need to be concluded, and all necessary construction permits to re-locate the diversion would need to be obtained by the Water Users. To avoid any interruption in water delivery, the Water Users would need to obtain these permits prior to the initiation of deconstruction activities on the South Cow Creek portion of the Project. Deconstruction activities on the South Cow Creek portion of the Project were estimated in the March 2009 LSA to begin in the 2010 to 2013 timeframe. The permits required to construct the new diversion may include:

² While PG&E's consultant attempted to estimate the costs of each alternative, the estimates were preliminary in nature, did not include significant cost components, and were developed for informal settlement discussion purposes only. Consequently, PG&E does not believe it appropriate for the estimates to be used as part of a formal analysis in a regulatory proceeding, particularly in this one, since, as noted below, the Commission does not have jurisdiction over matters of state water law.

³ 16 United States Code Section 821

⁴ For further elaboration on this point, please see PG&E's August 20, 2009, filing at pp. 5-8.

⁵ Although PG&E remains fully committed to decommissioning, the proposed alternatives to decommissioning impact the ongoing discussions with the Water Users.

- Lake and Streambed Alteration Agreement from the California Department of Fish and Game;
- Clean Water Act (CWA) Section 404 permit from the U.S Army Corps of Engineers; and
- CWA Section 401 water quality certification from the California State Water Resources Control Board.

Aquatic Resources (Project Economics)

4. *After performing initial relicensing studies and consultation with the agencies, you concluded that the cost of providing the necessary protection, mitigation and enhancement measures for the resources affected by the project would outweigh the economic benefit of generation. Please describe what measures were anticipated and their estimated costs. Specifically, we are looking for detailed information as to how you concluded that the economics of these measures would outweigh the economics of relicensing and continued growth. For example, we assume that fish passage and bypass flows would have been a major factor during the relicensing process and the cost of installing fish passage and providing bypass flows would have negatively influenced the economics of the project. Please provide your itemized economic analysis of the costs associated with the enhancement measures proposed during relicensing and how you determined that these costs outweigh the economic benefit of the project. In particular please provide the following:*
- An itemized breakdown of your estimated \$14.5 million cost to decommission the project.*
 - An itemized list of the anticipated resource enhancement measures, and their location, that most likely would have been imposed on the licensee during the relicensing process.*
 - Estimated costs associated with installing or implementing each of these measures.*
 - The economic result of each of these measures on the project, if they had been implemented (i.e. percentage of generation lost, and the associated loss of revenue).*
 - The projected costs of maintaining each of the project's facilities, after licensed, versus the projected value of generation revenue if the project had been licensed.*

RESPONSE - Aquatic Resources Item 4:

PG&E made the decision not to relicense the Project during the early stages of the relicensing process. Although PG&E had been conducting relicensing studies for 2 years and had consulted with the resource agencies, the resource agencies had not yet proposed specific protection,

mitigation, and enhancement measures for inclusion in a new license.⁶ Rather, PG&E performed a general economic analysis informed by its experience in several other relicensing proceedings, by preliminary discussions with the resource agencies, and by certain Project-specific assumptions. The age, configuration and small capacity of the generation facilities were also factors in PG&E's conclusion that an already marginally economic project would be rendered uneconomic under a new license.

Response to Part a: As stated in Section D.3 of the LSA, the current cost estimate for decommissioning the Project is \$14.5 million. These costs are broken down as follows:

Activity Phase	Current estimated cost
FERC process to receive license surrender order	\$4.5 million
Project facility decommissioning	\$9 million
Post-decommissioning monitoring	\$1 million
Total preliminary estimated decommissioning costs	\$14.5 million

Response to Parts b, c, d, e: As discussed above, at the time PG&E made its decision not to relicense the Project, PG&E had not received from resource agencies the specific resource enhancement measures proposed for inclusion in a new license. However, PG&E did perform a general economic analysis based on the company's prior relicensing experience, preliminary discussions with the agencies, and certain project-specific assumptions. The methods, calculations, and results of the economic analysis are proprietary to PG&E.⁷

Land Use

5. *Please provide the status of your intentions to either purchase or restore the 1.87 acres held in trust by the Department of the Interior (DOI) for the Bureau of Indian Affairs located where the penstock crosses the Indian trust land at the Cow Creek Development. DOI, in its letter to you dated July 10, 2009, listed two options for you to consider: (1) you could purchase the land in the easement, or (2) remove the pipe and restore the land to pre-permit conditions.*

⁶ Although specific resource enhancement measures were not provided, some of the issues raised during preliminary consultations with agencies included instream flows and fish passage – both of which represent high-cost actions.

⁷ Even if the results of PG&E's 2005 sensitivity analysis showed that the Project would have been economic, which it did not, or if it was demonstrated that PG&E's 2005 analysis was unduly pessimistic, which it was not, it is not clear what purpose would be served by the disclosure of such information. Because PG&E did not file an application for new license by the statutory deadline of March 27, 2005, it may not now seek a new license. To the extent the Commission is trying to assess whether the Project's licensing by some other entity might be economic in the current 2009 context, PG&E suggests it is inappropriate to ask PG&E to support that analysis.

RESPONSE - Land Use Item 5:

On September 4, 2009, PG&E sent Dr. Virgil Akins of the Bureau of Indian Affairs a letter expressing the company's intent to make an offer to purchase the property following completion of an appraisal (Attachment K). Although development of the appraisal took longer than anticipated, it was completed in mid-November. PG&E is currently reviewing the appraisal and anticipates contacting the Bureau of Indian Affairs (BIA) by early 2010 to begin negotiations to purchase the property.

6. *Does PG&E have any records of how often or how many times the California Department of Forestry & Fire Protection or the U.S. Forest Service has obtained water from Kilarc forebay for fire suppression activities? If so, please provide such records of how many times these agencies or others have accessed the project forebay to obtain water for fire suppression.*

RESPONSE – Land Use Item 6:

PG&E does not have a record of how often Kilarc Forebay has been used by state or federal agencies for fire suppression activities. California Department of Forestry and Fire Protection (Cal Fire) is the responsible agency for this area. PG&E has contacted Cal Fire and inquired about records for such use (Personal communication, Cheri (did not provide last name), Cal Fire, with J. Grady, ENTRIX, November 18, 2009; Personal communication, B. Payne, Aviation Management Unit, Cal Fire, with J. Grady, ENTRIX, December 2, 2009). Cal Fire has responded that these data are not normally recorded.

7. *Please provide the Commission with information pertaining to how you are negotiating decommissioning impacts on project lands owned by entities other than the licensee. Specifically, please address how you are working with private land owners with lands inside the project boundary, and used for project purposes, and how issues surrounding decommissioning of the project are being resolved. Also, provide a discussion on approximate timelines and deadlines to complete all decommissioning activities on privately-owned lands.*

RESPONSE – Land Use Item 7:

Throughout the decommissioning process, PG&E has been in communication with private landowners that own lands within the Project boundary that are used for Project purposes. Depending on the level of interest and involvement requested from the private landowners, PG&E has held meetings, site visits, conference calls, and phone discussions with individual private landowners to describe the decommissioning process, define PG&E's plans for decommissioning, and/or gain input on the decommissioning. In addition, some of the private landowners formally commented on the Project's Preliminary Proposed Decommissioning Plan (PPDP) and the LSA. Whenever possible, PG&E made an effort to accommodate private landowners concerns in the PPDP, for instance, by making revisions to the descriptions of Project facilities, or by altering the proposed method to decommission a facility. Looking

forward, PG&E anticipates continued discussions with some of the private landowners about access for decommissioning and subsequent resource monitoring.

PG&E's proposed schedule (as listed in LSA Section C.3, Proposed Schedule for Decommissioning) anticipated a reasonable amount of discussions and/or negotiations with private landowners, and PG&E anticipates resolving any remaining issues with private landowners by the time permits are issued for the decommissioning (currently estimated to occur between 2010 and 2013). PG&E also anticipated that the timeline to complete decommissioning activities on private land would follow the same proposed schedule as the physical decommissioning (currently estimated to end in the 2013 to 2016 timeframe), and the schedule to conduct post-decommissioning monitoring (currently estimated to end in the 2015 to 2018 timeframe).

Recreation

8. *Do any recreational facilities and/or opportunities exist in the vicinity (i.e., within 40 miles) of the Project area (e.g., the Battle Creek Project, FERC No. 1121) that are accessible to disabled persons? If so, please describe those accessible facilities.*

RESPONSE – Recreation Item 8:

Similar PG&E facilities to those at Kilarc Reservoir exist at Grace Lake and Lake Nora (FERC No. 1121), both of which are within 14 miles (direct radial measurement⁸) of the Project Area, and at Macumber and North Battle Creek reservoirs (FERC No. 1121), which are within 12 miles. As is true of Kilarc Reservoir, none of these lakes have facilities that comply with the Americans with Disabilities Act (ADA). However, like Kilarc Reservoir, the Grace Lake and Lake Nora areas have fairly wide access across level areas to their shorelines. Much of Lake Nora is encompassed by a drivable road making the shoreline accessible. Like Kilarc Reservoir, Grace Lake, Macumber, and North Battle Creek reservoirs also have berms surrounding the lake that only can be accessed cross-country. All of these reservoirs have picnic areas and restrooms that can be accessed from flat terrain and nearby parking.

In addition, Shasta-Trinity National Forest and Lassen National Forest have a wide range of accessible facilities that comply with ADA guidelines, many of which are within 40 miles⁹ of the Project Site. Shasta-Trinity National Forest facilities located within 40 miles include Antlers, Centimudi, and Packers Bay. Shasta-Trinity National Forest and Lassen National Forest facilities are displayed in Attachment L.

⁸ Using Kilarc Forebay as a centerpoint, measurements were taken using a direct route overland to the recreational site.

⁹ Using Kilarc Forebay as a centerpoint, a circle with a 40-mile radius was drawn around the area. Facilities within this area were included in Appendix I.

Cultural Resources

9. *Comments filed in response to scoping indicate that the upper portion of the Kilarc canal may have originally been constructed as a hydraulic mining source. While the Cultural Resources Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Decommissioning Project, FERC No. 606, Shasta County, California, addresses the existence of hydraulic mining water sources in the area prior to construction of the Kilarc facility, it does not specifically address the use of any portion of the Kilarc canal as a mining water source. Also, the Kilarc canal system, with the exception of the powerhouse, has been determined not eligible for listing on the National Register of Historic Places (NRHP) due to the lack of physical historic integrity of the resource. Has use of the canal for mining been specifically explored? If so, was this information part of the analysis and evaluation of the resource for listing on the NRHP?*

RESPONSE – Cultural Resources Item 9:

PG&E has reviewed the comments¹⁰ filed in response to scoping, to which FERC refers. The landscape features and old piping, which these comments speculate may be possible evidence of past hydraulic mining, were surveyed as part of the Cultural Resources Inventory and Evaluation for the Kilarc-Cow Creek Hydroelectric Decommissioning Project (Section 106 Report) where they occurred within the FERC Project boundary. No evidence of mining was observed in the area surveyed.

The potential historical use of the canal for mining was considered in preparing the Section 106 Report and in the analysis and evaluation of the resource for listing on the NRHP. However, no evidence was found that substantiated historic use of the canal for mining. Further, regardless of its past use the canal itself is not eligible for listing on the NRHP due to the lack of physical historic integrity of the resource, as FERC has noted. Therefore, even if historic use of the canal for mining had occurred, the lack of integrity of the resource would have precluded its listing.

10. *Please provide information on to what extent the interiors of the two powerhouses, along with all equipment and components (i.e. turbines) associated with the powerhouses, have been investigated and surveyed by you to determine any possible eligibility for the NRHP. Was such an investigation included in earlier archeological and historic property surveys done in association with decommissioning of the project?*

RESPONSE – Cultural Resources Item 10:

The Section 106 Report fully addressed the NRHP eligibility of the two powerhouses and their interiors as part of the decommissioning and LSA process. The Section 106 Report included a full NRHP evaluation of the two powerhouses and their interior components and equipment.

¹⁰ KC LLC et al. October 16, 2009. Comments of Davis Hydro on the scoping document for the Kilarc-Cow Creek Hydroelectric Project-California. FERC Docket No. P-606-000. Available at: http://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=12176640.

Kilarc and Cow Creek powerhouses and the interior components and equipment are historical resources within the Project Area of Potential Effects that are eligible for listing in the NRHP.

11. The October 2009 environmental site review did not include entering the powerhouses. Therefore, please provide us with the nameplates and rating information of the generating equipment inside the powerhouse as well as any photographs of the equipment.

RESPONSE – Cultural Resources Item 11:

Rating information is as follows:

Kilarc Powerhouse

- Two 3000-HP Pelton turbines that operate at 300 RPM
- Generators:
 - Unit #1 – 1500-kW Westinghouse synchronous generator, 2200 volts, 393 field amps
 - Unit #2 – 1730-kW Vasalia Electric synchronous generator, 2300 volts, 455 field amps
- 125 Excitation Voltage; 0.8 Power Factor

Cow Creek Powerhouse

- Two 1500-HP Pelton turbines that operate at 400 RPM
- Generators:
 - Unit #1 - 720-kW General Electric synchronous generator, 2300 volts, 206 field amps
 - Unit #2 - 720-kW General Electric synchronous generator, 2300 volts, 226 field amps
- 125 Excitation Voltage; 0.9 Power Factor; 900 KVA @ 60°C

See Attachment M for pictures of Kilarc Powerhouse's interior and its generating equipment nameplate. See Attachment N for pictures of Cow Creek Powerhouse's interior and its generating equipment nameplate.

12. In your October 2, 2009, response to the Commission's additional information request, you include information on consultation with the Redding Rancheria, other Tribes, and the Bureau of Indian Affairs. Please provide any form of documentation available to substantiate the information given in the October 2 filing. Documentation of consultation can include emails, phone records, and other types of documented communication, along with dated letters and meeting minutes.

RESPONSE – Cultural Resources Item 12:

See Attachment O for correspondence log and documentation on PG&E’s consultation with the Native American Heritage Commission, Redding Rancheria, other Indian tribes, and Bureau of Indian Affairs.

Socioeconomics

13. Please provide any available information on the affected environment and project impacts related to socioeconomics [pursuant to 18 CFR §4.41(f)(5)]. In addition, please specifically address how the proposed action (and its associated affects on water delivery systems) would affect the employment and/or livelihoods of the Abbott Ditch Users. Finally, how many distinct parties compose the Abbott Ditch Users and how many acres are irrigated by each user from the Abbott Ditch?

RESPONSE – Socioeconomic Item 13:

Per the Commission’s request, a socioeconomic analysis has been prepared pursuant to 18 CFR §4.41(f)(5) and is provided in Attachment P.

The Abbott Ditch Users are entitled, pursuant to a state court Adjudication of the watershed, to divert 13.13 cfs from the natural flow of the east channel of South Cow Creek below the confluence with Hooten Gulch (and not from Hooten Gulch itself).¹¹ Because PG&E assumes the Abbott Ditch Users’ diversion will be relocated to South Cow Creek consistent with the Adjudication, PG&E also assumes the Abbott Ditch Users’ livelihoods will not be impacted by the cessation of artificial flows in Hooten Gulch upon decommissioning.¹² However these issues are ultimately resolved, PG&E assumes the end result will be that the Abbott Ditch Users will exercise their water right.

According to a Motion to Intervene filed with FERC on July 13, 2009, by counsel for the Abbott Ditch Users and other parties, the Abbott Ditch Users is an informal association of property owners adjacent to Tetrick Ranch that “...consist of Donna Abbott, Art Abbott, Marcille Farrell, Rich Sabanovic, Erik Poole, Bob and Debbie Stanton, and Richard and Dana Jones.”¹³ PG&E does not have data regarding the number of acres irrigated by each user.

¹¹ LSA Section E.2.2.6.

¹² As noted in the response to Question # 3 above, PG&E has engaged with the Abbott Ditch Users in an effort to try and resolve the issues stemming from the relocation of the Abbott Diversion. Since the Federal Power Act reserves to the states jurisdiction over matters involving water rights, it has been PG&E’s expectation that issues involving matters of state water law would be addressed in a state forum. PG&E, therefore, did not address them in the LSA.

¹³ Motion to Intervene filed on July 13, 2009, by Tetrick Ranch, Abbott Ditch Users, and Shasta County. Available at: http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20090713-5165.