FEDERAL ENERGY REGULATORY COMMISSION Washington, D. C. 20426

OFFICE OF ENERGY PROJECTS

FERC No. 2079 – 054 Middle Fork American River Project Placer County Water Agency

Mr. Steve Jones
Power Systems Manager
Placer County Water Agency
P. O. Box 667
Foresthill, CA 95631

Subject: Minimum Streamflow Deviation

Dear Mr. Jones:

We received your July 29, 2005, report of a deviation from the required minimum streamflow below Hell Hole Reservoir on June 27, 2005. You reported that the release to the Rubicon River fell below the required release of 20 cubic feet per second (cfs) between 0800 and 1130 hours.

Background

Article 37 requires you to release 20 cfs below Hell Hole Dam between May 15 and December 14, and 10 cfs between December 15 and May 14 when the Folsom Reservoir runoff forecast on April 1 equals or exceeds 1 million acre-feet. The April 1, 2005, forecast exceeded 1.5 million acre-feet; therefore, you were required to maintain a minimum stream flow of 20 cfs below Hell Hole Dam on June 27, 2005.

You reported that the release from Hell Hole Reservoir is made through the small powerhouse at the base of the dam. You increased production of this unit to its maximum output on May 25, 2005, in anticipation of seasonal runoff, and maintained this level until June 27, 2005. Your operating staff was directed on that day to lower production to the May 25th level in response to a decrease in reservoir inflow.

The local operator completed the adjustment by 0800 hours and your operations center received an automated low-flow warning at 1031 hours. The center then ordered an increase in powerhouse output to provide the required minimum streamflow release. The increase was completed at 1123 hours. The flow records you provided show the following releases to the Rubicon River below Hell Hole Dam on June 27, 2005:

TIME (HOURS)	FLOW (CFS)
0745	26.0
0800	18.3
0815 thru 1100	17.1
1115	17.7
1130	19.5
1145	20.7
1200	21.9

You reported that between May 25th and June 27th all the snow on the ground between the powerhouse and the gage of record (U. S. Geological Survey Gage No. 11428800) melted. The loss of this contributory element to the flow recorded at the gage resulted in the deviation from the required streamflow for approximately 3.5 hours on June 27th.

You have advised the operator of the need to monitor streamflows at the gage when making adjustments, and to ensure that the releases exceed the requirement slightly to provide a small margin for error. You report you are also investigating the delay in the transmission of the automated low-flow warning.

Findings

The flow deviation on the Rubicon River below Hell Hole Reservoir was caused by operator error. Our December 12, 2002, letter regarding a flow deviation below the Interbay Dam caused by operator error stated that such deviations in the future could be identified as violations of your license. We conclude that the June 27, 2005, flow deviation below Hell Hole Dam is a violation of your license. The violation will be made a part of the compliance history for the project and taken into consideration regarding any future noncompliance events.

We find you have taken appropriate steps to try to prevent a similar occurrence in the future. We also find that, given the short duration of the violation, the time of year, and weather conditions, detrimental impacts to the aquatic resources of the Rubicon River likely did not occur. We request that within 45 days of the date of this letter, you

provide us with a report on the cause of the delay in the low-flow warning at your operations center. If you have any additional information or questions about this matter, contact Mr. Philip Scordelis at (415) 369-3335.

Sincerely,

Jane H Tuylin George H. Taylor, Chief

Biological Resources Branch

Division of Hydropower Administration

and Compliance