

**Comments of the California Department of Water Resources’
Transmission Planning Branch
On the California Department of Water Resources’
“State Water Project Delivery Reliability Report 2007”
March 13, 2008**

The Transmission Planning Branch of the California Department of Water Resources’ Power Planning and Risk Management Office submits the following comments regarding the “State Water Project Delivery Reliability Report 2007”:

The biennial report identifies factors that may impact water availability along with changes that can be made to improve future water supply reliability. The report updates DWR’s estimate of the ability to maintain current (2007) and future (2027) State Water Project (SWP) delivery reliability.

The report identifies various factors that affect the SWP’s ability to convey source water to the desired point of delivery. Among the factors identified as affecting Delta pumping operations were water quality constraints, fish and wildlife constraints, future sea level rise impacts associated with climate change, and levee failure impacts. However, the report did not, but should, address another important factor – potential restrictions on Banks Pumping Plant operation due to curtailment of energy transmission service to operate the pumps.

The SWP pumping plants in the Delta receive transmission service under the Comprehensive Agreement between DWR and Pacific Gas and Electric (PG&E). Under this agreement, which terminates on December 31, 2014, DWR has contractual rights for up to 275 megawatts (MW) of transmission service at the Banks Pumping Plant switchyard. However, only 157 MW is firm service; the remaining 118 MW is subject to curtailment by the California Independent System Operator (CAISO). Investor-owned utilities, such as PG&E, own most of the California high voltage transmission grid and, as a result of the electricity deregulation, has turned over the operation of these transmission facilities to the CAISO.

In June 2007, Banks Pumping Plant operation was severely restricted for much of the month to protect the Delta smelt. When the Delta smelt constraints were lifted in July 2007, DWR had intended to operate the plant continuously at full capacity to make up for June’s pumping restriction. However, Banks Pumping Plant operation was curtailed due to curtailment of transmission service.

A recent operations study by DWR indicates that to make up for lost pumping opportunities and maximize water delivery reliability, Banks Pumping Plant and the expanded South Bay Pumping Plant will require a combined 305 MW of firm transmission service. To that end, DWR’s Transmission Planning Branch is working with PG&E, CAISO, and the Western Area Power Administration to identify reinforcements needed to provide 305 MW of firm transmission service for these Delta

pumping facilities. It is anticipated that this level of service will occur no earlier than 2011 and could occur as late as 2015.

If you have any questions regarding the comments, please call Linda Quok, Chief of DWR's Transmission Planning Branch, at (916) 574-0617.