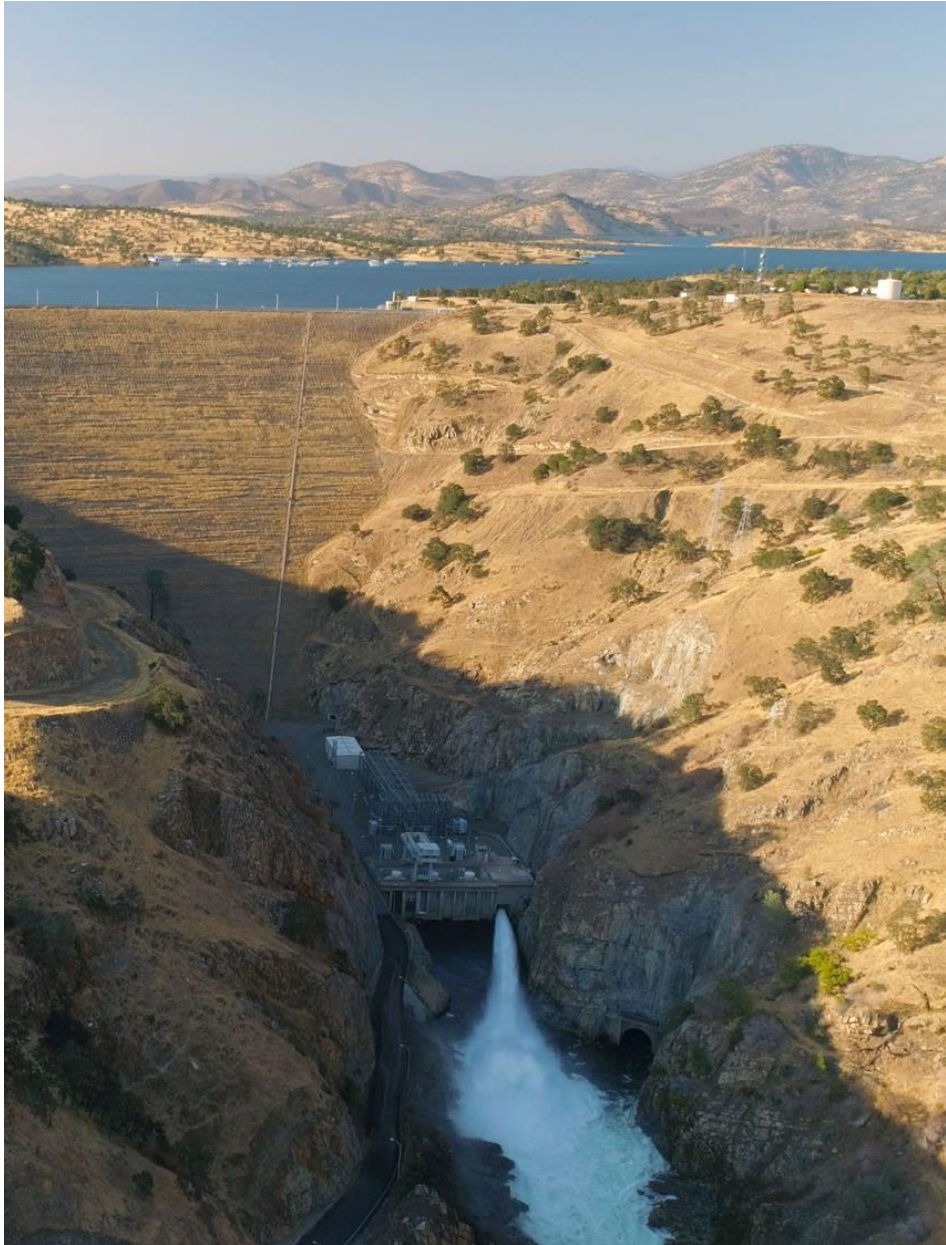




Don Pedro Hydroelectric Project Relicensing Case Study

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Located on the Tuolumne River in the Central Valley of California



Original Dam was built in 1923



New Don Pedro Completed in 1971 (500 ft. replacement dam)



Owned by two not-for-profit Irrigation Districts, the Modesto Irrigation District & Turlock Irrigation District



City and County of San Francisco



203 MW of Hydropower Generation



Provides 2,030,00 AF of water storage, irrigation and recreation



License Expired April 30, 2016

Don Pedro Project - Case Study



Since 2011, the Districts and the City and County of San Francisco have been working to relicense the Dam under the **Integrated Licensing Process**



Relicensing is a complicated undertaking because you have a living river shared by various species, used for multiple purposes- irrigation, storage and recreation.



However, 10 years to renew a license on a Dam when no physical changes being made seems excessive.

FERC's Integrated Licensing Process (ILP)



Over the years, however, Congress and FERC have tried to make improvements.

FERC adopted the **Integrated Licensing Process** in 2003 and made incremental improvements in the Energy Policy Act of 2005.

ILP PURPOSE:

To provide “predictable, efficient, and timely licensing process.”

Three Principles:

1. early issue identification and resolution of studies;
2. integration of other stakeholder permitting process needs; and
3. established time frames to complete process.



Don Pedro Project – Case Study

Using the **Integrated Licensing Process**, the Districts, with Federal and State agencies, Indian tribes and the public:

- Conducted over 30 FERC-approved resources studies \$35 million,
- Held 20 consultation workshops on environmental resources
- Developed seven (7) **site-specific FERC-approved models** to evaluate fishery benefits, impacts to water supply and economic impact of any proposed license condition.



FERC's Integrated Licensing Process (ILP)

The ILP process creates a FERC-Approved Study Plan

ILP final rule is binding on licensees only....so licensees must comply with the FERC-Approved Study Plan...

In contrast, FERC has no authority over federal resources agency. FERC said, however, it *“fully expects these entities to participate in the integrated process in good faith in order that the Commission's decisional record will, to the extent reasonably possible, serve as the basis for the decisions of entities with conditioning authority, and that any additional information these entities may require is known early in the process.”*

Licensees
Submit Final
License
Application
Based on
Record before
FERC



Recommended increased and properly timed environmental flows for fish and wildlife.

Provides predicted fishery improvements based on ILP approved studies and models.



Recommended recreation improvements built around needs demonstrated through the ILP.

Resource
Agencies
Propose or
Require License
Conditions not
Supported by
the ILP Approved
Studies or
Models



Preliminary flow requirements for fishery benefits are not based on the record.

Federal family's proposed mandatory conditions and their reasons for them are not aligned or are contradictory with each other.



Resources agencies failed to use ILP approved models to develop or evaluate their preliminary recommendations.



Recommendations

- The FERC process can work while protecting the intent of ESA and Clean Water Act.
- Hydro licensing process improvements are needed.
- Federal resource agencies must be held accountable to the same standards as licensees.
- Climate change requires us to look at hydropower differently – promotes a carbon-free, reliable and resilient electric grid