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STAFF PROPOSED CHANGES TO EXHIBIT 1000 (TN 210088)
PROJECT OWNER'S OPENING TESTIMONY
OF HIGH DESERT POWER PROJECT (97-AFC-1C)

Staff changes to the Project Owner's proposed changes to **SOIL&WATER-4** as presented in their opening testimony are shown in **bold double underline** and ~~**bold double strikethrough**~~.

SOIL&WATER-4 Injection Schedule

a. The project owner shall inject one thousand (1000) acre-feet of SWP water within twelve (12) months of the commencement of the projects commercial operation.

b. By the end of the four years and two months from the start of commercial operation, the project owner shall install and begin operation of a pre-injection ultraviolet (UV) disinfection system.

c. By the end of the fifth year of commercial operation, the project shall submit a report to the CPM demonstrating that HDPP has maintained an average THM concentration level consistent with the WDR permit requirements.

d. After the end of the fifth year of commercial operation, the project owner shall inject SWP water when it is available in excess of volumes needed to operate the project, up to a cumulative quantity of 13,000 acre-feet, subject to equipment capabilities and permit requirements. The amount of **injected SWP** water available to HDPP for extraction is equal to Injection minus Extraction minus Dissipation minus 1000 acre-feet, as defined in **SOIL&WATER-6**.

e. As a replacement of ~~n additional method~~ to build the project's injection groundwater bank, the project owner will work with the Mojave Water Agency (MWA) to seek a feasible agreement or modify existing agreements to allow the project to bank SWP water, for exclusive use in HDPP, in the Mojave River Basin through percolation using existing MWA facilities.

f. Once the MWA water bank for HDPP is greater than 2,000 acre feet, the project owner shall no longer bank water via direct injection.

g. The project owner shall achieve and maintain a combined bank of 13,000 acre feet, plus or minus 4,000 acre feet for use in any one year, by September 30, 2021.

Verification: The project owner shall submit an installation and operation report describing the pre-injection ultraviolet disinfection system (UV) by the end of the fourth year of

commercial operation. Forecasted estimates of SWP water to be injected shall be included in the quarterly Aquifer and Storage Recovery Well Report. The project owner shall submit a UV performance report by the fifth year of commercial operation. For other related items, see the verification to **Condition 5**. See also the verification to **Condition 12**. **If the project owner and MWA are able to reach an agreement or modify existing agreements regarding use of existing MWA facilities for the percolation and banking of SWP water, for the exclusive use in HDPP that is feasible for the facility, the project owner shall provide a copy of such agreement or modified agreements to the CPM.**

SOIL&WATER-5 Calculation of Balance

a. The amount of banked groundwater **as injected SWP water** available to the project shall be calculated by the CEC staff using the HDPP model, FEMFLOW3D. **The amount of MWA banked groundwater available for the exclusive use at the project, from ~~percolated~~ SWP water percolated by MWA, ~~available to the project~~ shall be calculated by MWA or the Mojave Basin Area Watermaster.** The amount of banked groundwater available shall be updated on a calendar year basis by the CEC staff, taking into account the amount of groundwater pumped by the project during the preceding year and the amount of water banked by the project during the preceding year.

SOIL&WATER-6 Banked Water Available for Project Use

a. The amount of banked groundwater available to the project during the first twelve (12) months of commercial operation is the amount of SWP water injected by the project owner into the High Desert Power Project (project) wells, minus the amount of groundwater pumped by the project owner, minus the amount of dissipated groundwater, and minus any amount described in SOIL&WATER-5(b).

b. The amount of banked groundwater available to the project after the first twelve (12) months of commercial operation is: **(1)** the amount of SWP water injected by the project owner into the project wells**,** minus the amount of groundwater pumped by the project owner, minus the amount of dissipated groundwater, minus one thousand (1,000) acre feet, and minus any amount described in SOIL&WATER-5(b) **and (2) the amount of SWP water percolated by MWA**.

SOIL&WATER-12

The project owner shall prepare and submit to the CEC CPM and, if applicable, to the Lahontan RWQCB for review and approval, a water treatment and monitoring plan that specifies the type and characteristics of the treatment processes and identify any waste streams and their disposal methods. The plan shall provide water quality values for all constituents monitored under requirements specified under California Code of

Regulations, Title 22 Drinking Water Requirements, from all production wells within two (2) miles of the injection wellfield for the last five (5) years.

The plan shall also provide SWP water quality sampling results from Rock Springs, Silverwood Lake, or other portions of the East Branch of the California Aqueduct in this area for the last five (5) years. Also identified in the plan will be the proposed treatment level for each constituent based upon a statistical analysis of the collected water information. The statistical approach used for water quality analysis shall be approved prior to report submittal by the CEC CPM and, if applicable, the RWQCB. Treatment of SWP water prior to injection shall be to levels approaching background water quality levels of the receiving aquifer or shall meet drinking water standards, whichever is more protective. The plan will also identify contingency measures to be implemented in case of treatment plant upset.

The plan submitted for approval shall include the proposed monitoring and reporting requirements identified in the Report of Waste Discharge (Bookman-Edmonston 1998d) with any modifications required by the RWQCB.

Verification: Ninety (90) days prior to ~~banking~~ **injection** of SWP water within the Regional Aquifer, the project owner shall submit to the Lahontan RWQCB and the CEC CPM a proposed statistical approach to analyzing water quality monitoring data and determining water treatment levels. The project owner shall submit the SWP water treatment and monitoring plan to the CEC CPM and, if appropriate, to the Lahontan RWQCB for review and approval. The CEC CPM s review shall be conducted in consultation with the MWA, the VVWD, and the City of Victorville. The plan submitted for review and approval shall reflect any requirements imposed by the RWQCB through a Waste Discharge Requirement.

SOIL&WATER-13

The project owner shall implement the approved water treatment and monitoring plan. All banked injected SWP water shall be treated to meet local groundwater conditions as identified in Condition SOIL&WATER- 12. Treatment levels may be revised by the CEC and, if applicable, by the RWQCB, based upon changes in local groundwater quality identified in the monitoring program not attributable to the groundwater banking program. Monitoring results shall be submitted annually to the CEC CPM and, if applicable, to the RWQCB.