DOCKETED

Docket Number:	02-AFC-04C
Project Title:	Walnut Energy Center Project - Compliance
TN #:	200101
Document Title:	Walnut Energy Center Authority's Comments on Staff Analysis
Description:	N/A
Filer:	Tiffani Winter
Organization:	Ellison, Schneider & Harris L.L.P.
Submitter Role:	Applicant's Representative
Submission Date:	7/31/2013 4:38:42 PM
Docketed Date:	7/31/2013

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July 31, 2013

Mr. Joseph Douglas
Compliance Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: Walnut Energy Center Authority, Walnut Energy Center (02-AFC-4C), Comments on Staff Analysis of Proposed Modifications to the Bridge Water Supply (Condition SOIL & WATER-5)

Dear Mr. Douglas:

The Walnut Energy Center Authority ("WECA") appreciates the opportunity to comment on the Staff Analysis of WECA's amendment seeking modifications to the Walnut Energy Center ("WEC") Bridge Water Supply and Condition of Certification Soil & Water-5.[1]

The WEC, approved by the Commission in February of 2004 and operational since February of 2006, is the 250-megawatt lynchpin for the Turlock Irrigation District ("TID") Balancing Authority. WEC was approved with both a primary water supply (recycled water from the City of Turlock) and a back-up supply (shallow degraded groundwater) to ensure it has an adequate water supply to continue its vital baseload operations, which are critical to meeting TID's Balancing Authority responsibilities.[2]

WECA's pending amendment petition asks the Commission to revise the original limit on the use of the groundwater as a backup supply because the outages experienced by the City of Turlock's Wastewater Treatment Plant (the "WWTP") have proven to be more frequent and extensive than Staff originally anticipated. WEC is a customer of the City-owned and operated WWTP, and as such WECA has no control over the operations of the WWTP, including when Force Majeure outages occur at the WWTP, how long those outages last, or how regulations governing the WWTP may affect its operations, reliability, and ability to provide recycled water to the WEC.

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[1] WECA is a joint powers agency formed by the Turlock Irrigation District and the Merced Irrigation District under the Joint Powers Act (Government Code Section 6500 *et seq.*).

[2] WEC's original back-up supply was potable water. The limit on the back-up supply in Condition SOIL&WATER-5 was based on this high-quality potable water supply. However, in 2004, WECA filed an amendment to change the back-up supply to poor quality groundwater. The SOIL&WATER-5 limit, however, remained unchanged.

As discussed in the comments included in Attachment A, WECA will not oppose the 180 acre-feet/year limit on a five year rolling average proposed in the Staff Analysis. It is important to note, however, that WECA had originally requested revised daily and annual limitations on backup water usage at levels supported by a Commission-approved "Alternative Water Supply Plan" discussed in the attachments hereto (respectively, 2 million gallons per day and 1,800 acre feet per year). The daily and annual limits proposed in the WEC petition would have ensured that there was a sufficient back-up water supply available to WEC that (1) would have no significant environmental impacts and (2) would comply with all applicable LORS. A chronology setting for key dates supporting the WEC-proposed limits is attached hereto as Attachment B.

In the spirit of compromise to move the amendment forward, WECA stated that it could accept a 360 acre-feet/year limit on a 5 year rolling average. This limit has conservatism built in which WECA could accept. WECA also believed this limit would be acceptable to staff given the approved Alternative Water Supply Plan and additional information requested by staff that WECA provided.

Staff has, as noted in their analysis, alternatively proposed a 180 acre-feet/year limit on a 5 year rolling average. As stated previously, WECA will not oppose this limit, and it certainly reduces the likelihood of an exceedance. However, WECA believes it should be recognized that in the future, due to circumstances beyond WECA's control related to the operation of the WWTP, we may have to request the Commission revisit these issues in a future amendment.

Thank you for your time and attention to this important issue.

Sincerely,

Brian LaFollette
Assistant General Manager
Turlock Irrigation District
On behalf of WECA

Attachments
Attachment A: WECA's Response To The Staff Analysis
Attachment B: Chronology of Key Dates Related to Backup Water Supply

ATTACHMENT A

WECA'S RESPONSE TO THE STAFF ANALYSIS

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July 31, 2013

WECA'S RESPONSE TO THE STAFF ANALYSIS

INTRODUCTION AND SUMMARY

The Walnut Energy Center Authority ("WECA") appreciates the opportunity to comment on the Staff's Analysis on WECA's amendment seeking modifications to the Walnut Energy Center ("WEC") Bridge Water Supply and Condition of Certification SOIL&WATER-5.

The WEC, approved by the Commission in February of 2004 and operational since February of 2006, is the 250-megawatt lynchpin for the Turlock Irrigation District ("TID") Balancing Authority. In approving the WEC, the Commission agreed that WEC should not be curtailed or shutdown because curtailment or shutdown could create serious system reliability problems for the TID Balancing Authority and, by extension, the Balancing Authorities connected to the TID Balancing Authority. To ensure that these reliability problems are avoided, the WECA sought and the Commission approved both a primary water supply and a backup water supply.

WEC's original primary water supply was potable water, then groundwater during the "Bridge Period" between the Commission's 2004 approval and recycled water becoming available in July of 2007. Today WEC continues to receive its primary water supply of recycled water from the City of Turlock's wastewater treatment plant (the "WWTP"), operated by the City, not TID. Recycled water is both the primary supply and the preferred supply for WEC. WEC is a customer of the City's WWTP and as such has no control over operations of the WWTP, including when outages (Force Majeure or otherwise) at the WWTP plant occur, how long the outages last, or how regulations governing the plant affect its operations and ability to provide recycled water to the WEC.

Groundwater is only used by WEC as a backup supply, when recycled water is unavailable from the City's WWTP. WECA has invested substantial resources provided by TID ratepayer-owners to optimize the water systems at WEC to use recycled water. As a result of that investment, it is quite simply more expensive to treat and operationally complex for WEC to use groundwater as the backup supply, compared to using recycled water whenever it is available. WECA would prefer to use recycled water whenever it is available, 100% of the time if possible; however, the use of recycled water is wholly dependent upon the operation of the WWTP. WEC is a customer, and WECA has a financial disincentive to use groundwater.

Staff has proposed a limitation on WEC's use of groundwater as backup supply of 180 AFY limit on a five-year rolling average. While in the spirit of resolution of this issue, WECA will not oppose the 180 AFY limit on a five-year rolling average, it is important that WECA highlights certain aspects of the record on several important points.

First, WECA still believes that the Commission could accept the revised Condition language that WECA originally proposed in January of 2011. In that original language, WECA proposed *two limitations* on WEC's groundwater use: (1) a daily limit of 2 million gallons per day (MGD) and (2) an annual limitation of 1,800 acre feet per year (AFY) of groundwater. Rather than being unlimited, WECA proposed and continues to believe that these two limitations are appropriate for WEC's operations for the reasons discussed herein.

Second, WECA proposed the two limitations because WECA had supplied Commission-requested information to demonstrate that the WEC would not have any significant impacts on the environment or human health and that WEC would be in compliance with all applicable laws, ordinances, regulations, and standards ("LORS") with the 2 MGD and 1,800 AFY limitations.

Specifically, in August of 2006, WECA provided a detailed "Alterative Water Supply Plan" as required by Condition SOILS&WATER-6. That Alterative Water Supply Plan demonstrates that WEC would have no significant impacts and would comply with applicable LORS even assuming the hypothetical scenario where groundwater was used as the primary and sole supply of water for WEC at the 2 MGD and 1,800 AFY limitations for fifty years. The Alterative Water Supply Plan -- approved by the Commission in August of 2006 -- demonstrates no adverse effects and LORS compliance and was thus the basis for the language originally proposed by WECA in January of 2011.

Third, in response to Staff's rejection of the two limitations of 2 MGD and 1,800 AFY limitations, WECA proposed during this Amendment process a limitation of 360 AFY on a five-year rolling average. WECA argued that rather than an annual limitation of 1,800 AFY, WECA believes that -- on average --- the City's WWTP will be reliable over a five year period. WECA then took the 1,800 AFY and divided by 5 years in a 5-year rolling average and proposed an annual limitation of 360 AFY on a 5-year rolling average. Put another way, WECA also believes based on operating data for the City WWTP that a reasonable baseline operating capacity assumption for the City of Turlock's WWTP would be an 80% capacity factor. Based on the data TID provided in its Data Responses, it is reasonable to assume that the City WWTP could be unavailable 20% of the time when WEC requires water, a twenty percent "outage". The WEC's maximum annual water needs are 2 million gallons per day and 1,800 AFY. If a 20% outage rate for the WWTP is assumed, then the condition reflects a potential for outages of 20% of 1,800 AFY or 360 AFY. Staff disagreed with WECA's assessment and concluded, "on average," that 180 AFY would suffice. Given the facts, the 360 AFY on a 5-year rolling average seemed like a good compromise.

WECA believes it is important to note that the Staff's recommendation of 180 AFY on a 5-year rolling average may make it more likely that WECA will be back before the Commission in the future, should the City WWTP prove to be less reliable than Staff assumes in the analysis.

Should the WWTP's reliability not meet the assumptions in the Staff analysis, WECA would in the future be required to declare a "Force Majeure" outage, as provided for under condition SOILS&WATER-6, and seek further changes to this Condition.

WECA prefers to use recycled water as its primary supply and has a financial incentive to do so. Regardless, WECA has no control over the operations of the WWTP. It also has no control over regulations that affect the future operations and reliability of the WWTP. The 180 AFY limit on a five-year rolling average provides WEC with more "cushion" than the previous limit. However, WECA respectfully disagrees with Staff's conclusion that given proposed modifications at the WWTP, in the future, outages may not occur at all.

THE IMPORTANT AND RELEVANT SOIL&WATER-6 ALTERNATIVE WATER SUPPLY PLAN THAT DEMONSTRATES THAT WEC'S WATER USE WOULD HAVE NO SIGNIFICANT ENVIRONMENTAL IMPACTS AND WOULD BE IN COMPLIANCE WITH APPLICABLE LORS SHOULD BE CONSIDERED IN THE ANALYSIS

WECA submitted a license amendment in 2004, which was approved by the CEC in 2005, to use shallow, degraded groundwater from the unconfined aquifer in lieu of high quality potable water as its bridge supply. In its 2004 amendment petition, WECA also sought to replace the 54 AFY limit with dual limitations of two million gallons per day or 1,800 AFY of poor quality groundwater recommended in the pending Amendment. At that time, the Staff responded to this request by stating:

> Staff has confirmed with the project developer that no new information or analysis is available to substantiate the request to remove the limit on groundwater use for back-up at this time. Rather the Energy Commission included Condition of Certification Soils & Water-6 to address any alternative supplies that may be needed in the event that recycled water is not available as expected or in the event of a significant disruption in water supplies once the project starts using recycled water. The project developer has not yet developed or submitted any plans related to Soil and Water-6. As a result, the developer has agreed that the changes to Soil & Water-5 will be restricted to the changes requested in the petition only and no changes will be made to Soils & Water-6. Therefore, staff did not analyze the potential effects associated with prolonged use of groundwater in excess of 54 acre-feet/year for back-up supplies to recycled water.[1]

Since WECA had not at that time yet submitted the SOIL&WATER-6 Alternative Water Supply Plan, it withdrew its request to replace the 54 AFY limit with dual limits of two million gallons per day or 1,800 AFY.

In August 2006, WECA submitted its Alternative Water Supply Plan as required by Condition SOIL&WATER-6. The Alterative Water Supply Plan was approved by the Staff later that

[1] California Energy Commission, Walnut Energy Center Authority Staff Analysis of Bridge and Construction Water Supply, December 23, 2004, page 5.

month. The condition required that the plan address recycled water not being available by December 31, 2006, or a force majeure event occurring after the initiation of recycled water service. The Alterative Water Supply Plan prepared by WECA covered both. The purpose of the Alterative Water Supply Plan was to demonstrate that there would be no net increase in the project's use of high quality potable ground water above the historical average of 54 AFY, using an alternative water supply such as "shallow, degraded groundwater from the unconfined aquifer in the vicinity of the project site."[2]

WECA's Alternative Water Supply Plan analyzed the WEC's hypothetical use of shallow, degraded groundwater as its sole water supply for 50 years of WEC operations. The shallow, degraded groundwater is in the unconfined aquifer. Given the volume of water in this aquifer is both poor quality and results in a high water table, TID must continuously pump water to lower the water table in order to protect the root zone of crops (also referred to as "dewatering").

The analysis in the Alternative Water Supply Plan demonstrated that WEC could use degraded shallow groundwater without impacting the unconfined aquifer. Although the Staff Analysis for WECA's current amendment petition does not mention WECA's approved SOIL&WATER-6 Alternative Water Supply Plan, it states, "Staff also concludes that since the WEC groundwater pumping would likely replace and thereby reduce the volume of water needed for TID dewatering there would be no significant net increase in groundwater pumping that would exacerbate overdraft conditions. "

Based on the approved Alternative Water Supply Plan, this result would be the same even if WEC used groundwater as its sole water supply for the operating life of the plant.

The Alternative Water Supply Plan was implemented when the WEC commenced commercial operation in February 2006 until recycled water was available beginning July 2007. During that seventeen month period, the WEC operated solely on groundwater with no negative effects.

THE GROUNDWATER QUALITY ANALYSIS PROVIDED BY WECA CONFIRMS THAT WEC'S USE OF GROUNDWATER WILL HAVE NO SIGNIFICANT EFFECTS ON LOCAL OR REGIONAL WATER QUALITY

As part of the current amendment petition, WECA provided an analysis requested by Staff which evaluated whether increasing the permitted annual pumping at the WEC wells to 360 AFY would cause a change in water quality in the unconfined aquifer at or near the WEC pumping wells.

The groundwater quality data used for the analysis was based on the electrical conductivity (EC) measurements WEC collects daily during periods of groundwater pumping. EC is commonly used as a proxy value for Total Dissolved Solids (TDS). TDS is a measure of the concentration of dissolved minerals in the water and is a common general measure of water quality. High values of TDS are generally considered indicative of poor water quality. Other water quality parameters, such as nitrate and pesticides, are also of concern in the aquifer. Given that there is limited water quality data available for those constituents for the aquifer around the WEC, TDS is generally considered a conservative tracer and served as a good proxy for other constituents

[2] Condition of Certification SOIL&WATER-6, CEC Commission Decision for the Walnut Energy Center, page 205.

that degrade or react with the aquifer and move more slowly through the system. Therefore, for the analysis, changes in EC concentration at the WEC wells were used to indicate changes in water quality over time.

The analysis demonstrated that increasing WEC groundwater use to a maximum of 360 AFY would not cause a significant change in water quality in the aquifer near the facility. Specifically, the analysis results determined that when compared to the magnitude of drainage well pumping in the vicinity of the WEC, the WEC pumping at 360 AFY would be minor. When compared to the overall water balance of the basin, the proposed WEC pumping is negligible. The analysis also showed that water quality in the aquifer around WEC appears to vary to a moderate degree over time, but that the variation does not have a consistent trend and does not correlate to pumping at WEC nor pumping from the drainage wells near WEC.

The water quality analysis performed by Staff determined that the WEC pumping is unlikely to further contribute to a significant water quality impact. Specifically it states:

> "…staff concludes that the upper aquifer [also referred to as the unconfined aquifer] is likely to have been almost but completely mixed and water quality has already been significantly degraded in the project area, at least above the level of pumping well screens that begin at an average depth of approximately 150bgs. Therefore it is unlikely that limited pumping of WEC wells would further contribute to a significant water quality impact."

However, Staff then cautioned that an unspecified increase in groundwater pumping could possibly induce upwelling, allowing higher quality groundwater to flow into the mixing zone of the unconfined aquifer and become degraded. Given that the unconfined aquifer is defined by the impermeable Corcoran clay layer and none of the WEC wells penetrate the Corcoran clay, it is impossible for upwelling to occur.

WECA believes water quality is not an issue regardless of whether 180 AFY of groundwater is pumped or an amount greater than that.

THE WEC RECORDS THE MOST ACCURATE DATA REGARDING WHEN IT RECEIVES RECYCLED WATER FROM THE WWTP AND BELIEVES THAT ALL OUTAGES MUST BE INCLUDED IN ANY ANALYSIS

The 180 AFY groundwater limit on a five-year rolling average is based more on the operation of the WWTP and its outage potential rather than the environmental effects of the WEC's use of groundwater. In addition, WECA questions the outage data used in the analysis and how it was used.

First, the Staff Analysis utilized information provided by the City of Turlock for interruptions of recycled water to the WEC rather than the data provided by the entity regulated by the CEC, the WECA. The City is under no obligation to collect and retain outage data affecting WEC to the same standards as WECA. WECA meters the use of both groundwater and recycled water and can determine precisely when recycled water interruptions occur and when the recycled water is

being received from the City. Below is a revised Figure 1 from the Staff Analysis, which includes the WWTP outage information collected by WEC and the outage data the City provided Staff.

Figure 1

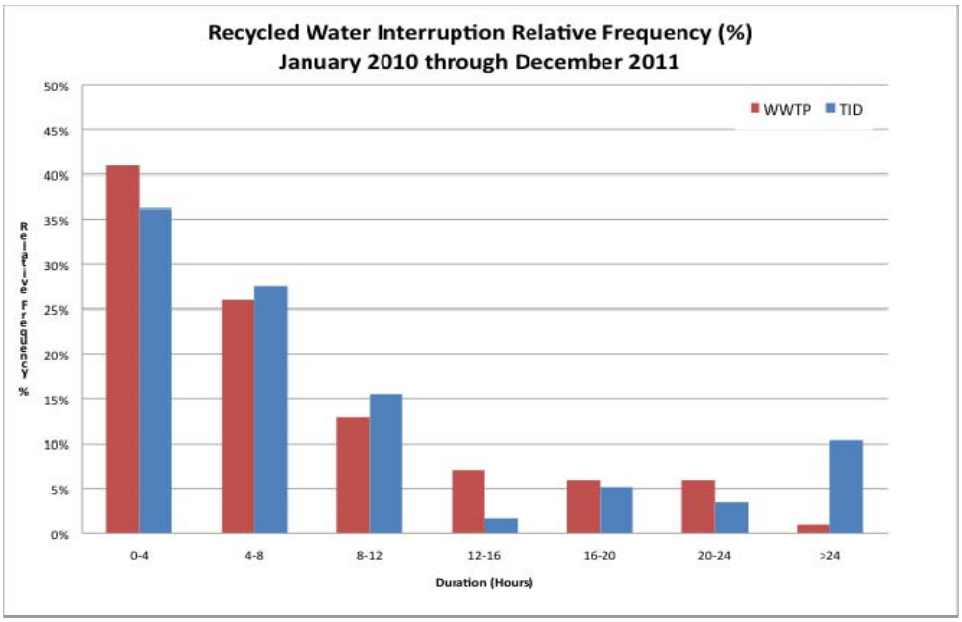

Figure 1 above, shows the difference between the City's data and WECA's. WECA firmly believes its data is more accurate for determining the history of recycled water availability to the WEC.

In addition, Staff indicates that extensive disruptions (referred to in the analysis as "extreme event") experienced by the WWTP were excluded from the Staff's statistical analysis. The lengths of time for the remaining interruptions (referred to in the analysis as "routine interruptions) were averaged. For the WEC, any disruption of the WWTP whether defined as extreme or routine, is the same. It results in the WEC relying on groundwater for its water supply and counting towards the CEC's imposed limit. WECA believes that a backup supply should be available for not only "routine" expected interruptions, but atypical unexpected interruptions as well. Given this, no interruption should be excluded from the analysis regardless of its cause or whether it is considered rare.

When the WEC was licensed, the City of Turlock determined its worst case scenario for anticipated outages of its tertiary treatment system as lasting 3 days. The Staff believed this

assumption was "unlikely, but possible."[3] In early 2011, the WWTP experienced three outages that lasted well over the City's worst case assumption. The first outage lasted nearly eight days. The second outage lasted seventeen days. And the third event lasted eleven days. The duration of these events was obviously well beyond what the City considered its worst case and the Staff believed was unlikely.

The Staff Analysis concludes that the City has made modifications to its facility, which would preclude these lengthy interruptions from occurring in the future. It is important to note that one of the City's proposed modifications has not yet been implemented and is contingent upon the availability of funds. The analysis states that this future modification "will reduce the frequency of interruptions, if not eliminate them all together."[4] WECA fervently hopes this will be true but also knows it is imprudent to rely on this assertion for a power plant that is the keystone asset for the TID.

[3] Walnut Energy Center, Final Staff Assessment page 4.8-18.
[4] Walnut Energy Center, CEC Staff Analysis of Proposed Modifications to the Back-up Water Supply, June 28, 2013, page 15.

Attachment B:

Chronology of Key Dates Related to Backup Water Supply

WALNUT ENERGY CENTER
CONDITIONS SOIL & WATER-5 AND SOIL & WATER-6
BACKUP WATER SUPPLY
CHRONOLOGY

THE ORIGINAL CERTIFICATION: POTABLE WATER AS A "BRIDGE SUPPLY"

- At the time of the original California Energy Commission ("Commission" or "CEC") Decision on February 18, 2004, the City of Turlock's Wastewater Treatment Plant ("WWTP") was undergoing improvements. Recycled water meeting Title 22 standards was not then available, but was expected to become available some time shortly after the Project was to commence commercial operations.

- Accordingly, the Commission approved the use of potable water from the City as an interim supply, or "Bridge Supply," for cooling, steam cycle make up and also as a back-up supply until the WWTP was able to produce recycled water.

- Once recycled water could be delivered, potable water ("fresh water" or drinking water) was permitted for use by the Commission as a back-up source of water in the event of a short-term interruption in recycled water delivery. The use of potable water as a back-up supply after the Bridge Supply period was limited to 54 AFY and was calculated using a 5-year rolling average.

- The 54 AFY limit represented the amount of water historically used for irrigating the 18 acre WEC site. The Staff was adamant about this limit because they wanted no net increase in water use by WEC beyond what had been used for irrigation.

THE CONVERSION FROM POTABLE WATER TO POOR QUALITY, SHALLOW GROUNDWATER AS THE BACKUP SUPPLY

- Although the February 2004 Decision allowed the use of potable water for cooling, steam cycle make up and back-up purposes, the WEC plant never actually used potable water.

- Instead, on September 3, 2004, WECA requested that the CEC amend the WEC's license to forgo the use of potable water supply in favor of the use of poor quality groundwater from on-site wells constructed to capture degraded non-potable water from a shallow aquifer.

- WECA's amendment petition also sought to remove the 54 acre-feet/year limit since it was now seeking to use a non-potable, low-quality water source as the backup supply.

- On January 19, 2005, the CEC approved the use of poor quality groundwater from WEC's wells for both the primary supply during the Bridge Supply period and as a back-up to recycled water once it became available.

- The Staff did not accept WECA's request to remove the 54 AFY limit on groundwater. Specifically, Staff stated that "no new information or analysis is available to substantiate the request to remove the limit on groundwater use for back-up at this time."

- However, Staff acknowledged that WECA may provide such information pursuant to SOILS & WATER-6, which would "address any alternative supplies that may be needed in the event that recycled water is not available as expected or in the event of a significant disruption in water supplies once the project starts using recycled water."

- On February 28, 2006, the WEC commenced commercial operations and ran for 17 months on 100% groundwater without any detrimental effects, until recycled water was available in July 2007.

THE ALTERNATIVE WATER SUPPLY PLAN IS APPROVED

- On August 8, 2006, TID submitted the Alternative Water Supply Plan ("AWSP") required by Condition of Certification SOILS&WATER-6.

- The AWSP was approved by the CEC on August 28, 2006.

- The AWSP analyzed the impacts of the most extreme groundwater usage hypothetical scenario: pumping 1,800 AFY of groundwater for 50 years, although WEC only has a design life of 30 years.

- The AWSP concluded that regional water supplies would not be affected by the use of groundwater as a primary and sole supply source for WEC, even at these high, hypothetical study levels.

- In addition, of the 43 neighboring wells only one well, the Ruble Road well, could potentially be impacted under the 50 year worst case scenario. The potential drawdown at that well location is 11.1 feet while the top of the well screen is at a depth of 60 feet and the well is drilled to a depth of 76 feet. It is unlikely that the drawdown from WEC pumping would affect the operation of this well. Indeed it has been previously documented that five years of pumping by the on-site wells would not affect the well.

- The determination regarding the potential for impacts on neighboring wells from this hypothetical is highly "conservative"; that is, the AWSP over-predicts potential impacts by assuming pumping of groundwater to meet the WEC's entire water needs (as opposed to as a back-up supply only) and by relying on well data from October 1991, historically the month with the most severe drought conditions.

- The AWSP – approved by the Commission – showed WEC could use groundwater as its primary and sole source of water -- 1,800 AFY of groundwater for 50 years -- without significant environmental effects.

- Accordingly, the use of groundwater as a backup supply only when the City's WWTP experiences an outage as requested in the pending Amendment would also have no significant environmental impacts.

THE PENDING AMENDMENT, THE CORRECT REPORTING OF GALLONS, AND THE MATH ERROR IN CONVERTING GALLONS TO ACRE FEET

- WEC has reported, and reported correctly, metered water usage data showing how much recycled water and how much groundwater the WEC facility has used each and every month since operations began.

- Specifically, the gallons of both recycled water used and groundwater used has always been reported correctly.

- WECA incorrectly used a calculation showing 1 acre foot = 3,259,000 gallons instead, of the correct conversion factor of 1 acre foot = 325,851 gallons. This conversion error resulted in water usage in acre-feet being off by one decimal place or a factor of ten.

- The conversion factor itself was shown prominently on the page of every Annual Compliance Report (ACR), and, again, in every ACR the total gallons used was reported correctly.

- In May of 2010, the Staff informed WECA of the gallons to acre-feet conversion error. In response, TID filed an amended ACR with explanation and prepared an amendment to allow groundwater use beyond the 54 AFY 5-year rolling average.

- After investigation, meetings, calls, and emails with Staff, submission of information, and consultations with TID's Staff and management, the pending Amendment was filed on January, 21 2011.

- On February 2, 2011, WEC provided its first set of responses to Staff's initial, informal Data Requests.

- On June 23, 2011, Staff issued Data Requests 1-10.

- On July 25, 2011, WECA provided answers to Data Responses 1-10.

- On May 2, 2012, Staff issued Data Requests 11-17.

- Also on May 2, 2012, TID's Assistant General Manager, Brian LaFollette sent Roger Johnson proposed condition language to resolve these issues by making the reasonable assumption of a 20% outage rate for the WWTP which would allow for a limitation of 360 AFY on a five year rolling average.

- On May 17, 2012, WECA provided answers to Data Responses 11-17.

- On June 6, 2012, CEC Staff attended a site visit of the Walnut Energy Center to see its water supply and treatment system.

- On August 13, 2012 CEC Staff and TID Staff and consultants met to discuss the WECA amendment petition. At the meeting, the CEC Staff requested groundwater quality information resulting from additional WEC groundwater pumping.

- On September 26, 2012 a conference call was held between CEC Staff and the Cardno-Entrix Staff to discuss groundwater quality associated with the proposed increased groundwater pump limits at WEC.

- On October 18, 2012, a report prepared by Cardno-Entrix on Walnut Energy Center groundwater pumpage and aquifer water quality was submitted to Staff.

- On June 28, 2013, Staff issued the Staff Analysis on the pending Amendment.