

## DOCKETED

<b>Docket Number:</b>	97-AFC-01C
<b>Project Title:</b>	High Desert Power Plant (COMPLIANCE)
<b>TN #:</b>	206839
<b>Document Title:</b>	Letter Regarding Industrial Consumptive Use of Mojave River Basin Waters
<b>Description:</b>	N/A
<b>Filer:</b>	Christine Stora
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	12/4/2015 3:56:21 PM
<b>Docketed Date:</b>	12/4/2015

**CALIFORNIA ENERGY COMMISSION**

1516 Ninth Street  
Sacramento, California 95814

Main website: [www.energy.ca.gov](http://www.energy.ca.gov)



December 4, 2015

**Via Email**

Valerie Wiegenstein  
Watermaster Services Manager  
Mojave Water Agency  
13846 Conference Center Drive  
Apple Valley, CA 92307-4377

**INDUSTRIAL CONSUMPTIVE USE OF MOJAVE RIVER BASIN WATERS FOR THE HIGH DESERT POWER PROJECT (97-AFC-1C)**

Dear Ms. Wiegenstein:

The High Desert Power Project (HDPP) owner is petitioning the Energy Commission to use up to 3,090 acre-feet per year (AFY) of water withdrawn from the Mojave River Basin (MRB) as a back-up industrial water supply. The water would be needed for the remainder of the project design life, or for a minimum of 18 years. Energy Commission staff are currently conducting an environmental analysis of the project owner's petition submitted on October 30, 2015. The purpose of this letter is to confirm existing information and to request additional information on the long term use of MRB groundwater. We believe that direct input from Mojave Water Agency (MWA) on what the potential impacts may be to MRB would be of use to the project owner, staff, and the Energy Commissioners that will adopt a decision on the petition.

Use of fresh water for cooling purposes is against state and Energy Commission policies, unless it can be demonstrated that use of other, lower quality sources of water is environmentally undesirable or economically infeasible. Staff currently believes that the proposed request of 3,090 AFY for project operation is not necessary or consistent with state and Energy Commission water policy. While the project is licensed to use up to 4,000 AFY of State Water Project (SWP) water, deliveries to the project have been limited and inconsistent. The project owner and the Energy Commission believe that back-up water supply from one or more sources is needed and prudent. The project owner has undertaken a feasibility study of using recycled water, but believes it is inadequate for their needs.

Staff determined in an independent assessment that there is an adequate supply of recycled water available for project operation. However, staff agrees that recycled water supplies can be interrupted, and would recommend that the project be allowed limited access to a backup supply, such as groundwater from the adjudicated MRB. We do not yet have a limit in mind for annual groundwater use. In addition to being against state and Energy Commission policies, staff is concerned that the proposed project use of fresh

Valarie Wiegenstein  
December 4, 2015  
Page 2

water from the groundwater basin, and in the quantities requested, could exacerbate impacts to the MRB and seeks to ensure that any potential impacts are addressed.

Staff requests that you confirm if the proposed supply of 3,090 AFY is available for the project life and discuss what, if any, limitations MWA may have in providing the requested supply. It would also be helpful if you could discuss under what circumstances the availability would be limited, including frequency in any one year, frequency from year to year, and the range of magnitude of potential effect from such use on MRB. Please also let us know, if possible, how MWA sees the commitment of the groundwater to project operation might affect the balance of groundwater in the MRB for other uses beyond consumptive use at the HDPP power plant and if there could be any impacts to the MRB that would require mitigation.

Your assistance in identifying these impacts and helping us address them would be appreciated. We are meeting with the project owner on December 10, 2015 at a workshop in Sacramento. The project owner hopes to have a decision from the Energy Commissioners in February 2016 in order to participate in the next water year's auction, so your input would be most useful in the next month.

If you have any questions regarding this request please feel free to contact Karim Abulaban at 916-651-3775, or by email at [abdel-karim.abulaban@energy.ca.gov](mailto:abdel-karim.abulaban@energy.ca.gov).

Regards,

Date: \_\_\_\_\_ Original signed by: \_\_\_\_\_  
CHRISTINE STORA, Manager  
Compliance Office  
Siting, Transmission, & Environmental Protection Division

Mail List # 707

High Desert Power Project Listserv

cc: Energy Commission Docket Unit (97-AFC-1C)