

## DOCKETED

<b>Docket Number:</b>	97-AFC-01C
<b>Project Title:</b>	High Desert Power Plant (COMPLIANCE)
<b>TN #:</b>	210234
<b>Document Title:</b>	ROC - Phone conference with MWA and City of Victorville Representatives
<b>Description:</b>	Report of Conversation for phone conference with Mojave Water Agency and City of Victorville representatives to discuss availability of groundwater from the Mojave River Basin to the High Desert Power Project
<b>Filer:</b>	AbdelKarim Abulaban
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
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*Siting and Environmental Protection Division*

**FILE: (97-AFC-1C)**

		<b>PROJECT TITLE: High Desert Power Project</b>	
<input checked="" type="checkbox"/> <b>Telephone</b>		<input type="checkbox"/> <b>Meeting Location:</b>	
<b>NAME:</b>	Abdel-Karim Abulaban	<b>DATE:</b>	12/22/2015
<b>WITH:</b>	City of Victorville and Mojave Water Agency representatives		
<b>SUBJECT:</b>	Availability of MRB groundwater to HDPP		

**BACKGROUND:**

Energy Commission staff, Karim Abulaban, Paul Marshall, Matt Layton, Joseph Douglas, and Christine Root, held a phone conference with representatives of the Mojave Water Agency (MWA) and the City of Victorville (CVV) to discuss availability of groundwater from the Mojave River Basin to the High Desert Power Project. The project owner filed a Petition to Amend (PTA) on October 30, 2015, seeking approval to have access to 3,090 acre-feet per year (AFY) of groundwater from MRB. Representing MWA were Kirby Brill, the General Manager; Valerie Wiegenstein, Watermaster Services Manager; and Bob Wagner, Watermaster Engineer. The City of Victorville (CVV) was represented by Steve Ashton, Water Supply Manager.

The purpose of the conference was to get information on the availability, cost, and willingness of MWA to supply up to 3,090 acre-feet per year (AFY) of adjudicated Mojave River Basin (MRB) water to the High Desert Power Project (HDPP). In addition, staff wanted to learn about the mechanism by which the HDPP requests and receives State Water Project (SWP) water. Staff needed to learn these things in relation to the October 30, 2015 amendment petition filed with the Energy Commission by the project owner to be allowed to use alternative water supplies to drought-proof the project for the remaining project life - about 18 years.

**DISCUSSION:**

After sharing the purpose of the meeting, both through emails prior to the meeting, and verbally at the start of the meeting, staff learned the following from the MWA and CVV representatives:

1. MWA representatives informed staff that it would not be in favor of the HDPP relying on permanent allocation of up to 3,090 AFY of groundwater from the MRB, even though the project would be paying to replace that water on a 2:1 basis since the project use is consumptive. Rather, MWA prefers that the project keep requesting SWP water for use at the project and for filling the project water storage injection bank, and that if the project supplies fall short of project needs then MWA would be willing to act as a fall-back source of backup water for the project.



2. MWA representatives also expressed willingness to bank SWP water for the HDPP by percolating the SWP water delivered for the project instead of the injection bank the project has been using. The MWA representatives favor this arrangement since it gives the agency the flexibility to percolate the water wherever it is needed most in the basin.
3. Since the HDPP does not have a set allocation, cessation of requests from the project would not affect overall balance of MWA water. Whatever the project owner orders is just delivered to MWA for use by the HDPP, whether that use is direct from the SWP, or for injection into the project's groundwater bank maintained as a backup source of water.
4. Free Production Allowance (FPA), which is the amount of water that can be produced by every user in the basin at no cost, is not adjusted every year. It is adjusted whenever a need arises to do so as a result of the balance in the basin going down. Since the Alto basin has been within operating balance limits, the FPAs have not been changed for the past 10 years, and no change is anticipated for quite some time. However, nobody can tell how long this situation will last, or when the FPAs will need to be revisited.
5. The amount of SWP water that gets allocated to the HDPP does not depend on how much the project owner asks for, but it is determined based on past consumption. The project owner can ask for any amount of water, but MWA will only allocate an amount based on previous use by the project. HDPP always requests the full amount (4,000 AFY for operation and another 4,000 AFY for injection) even though it has never used the full amount.
6. The primary source of water for replenishment in the MRB is SWP.
7. HDPP cannot rely on water from MWA without allocations from SWP, because MWA depends on SWP deliveries to replenish the basin.
8. In response to a question about the quality of the SWP water, and whether it has been a frequent occurrence that the quality of the SWP water is poor, MWA representatives informed staff that the quality of the SWP water has been poor only occasionally when there is a problem with the aqueduct that needs maintenance, causing the water to be stagnant and not move for some time. According to the MWA representatives, the last time such an event occurred was a few years ago, when the aqueduct had a break that took a few days to repair. Otherwise, the quality of the SWP water is generally good.
9. MWA representatives also informed staff that during the licensing process they supported the development of the bank for SWP water as a backup supply because of the variability in the SWP deliveries. They also emphasized the importance to the project owner of banking SWP when available both before and after operation began. Surplus water was available and allocation was granted, yet the project owner did not take advantage of it for banking.
10. CVV supports use of recycled water at HDPP. The CVV representative informed staff that the city is working with the Dr. Pepper/Snapple Juice plant to bring down the concentration of total dissolved solids (TDS) in the wastewater discharged to the city's Industrial Wastewater Treatment Plant (IWWTP). The CVV representative also informed staff that due



to the diversion of about 2 million gallons of domestic wastewater from the Victor Valley Wastewater Reclamation Authority's (VWRA) plant to the IWWTP, which commenced in February 2015, the TDS in the effluent of the IWWTP is currently around 450 mg/l, which is acceptable for HDPP use. Nobody knows how long this will last, but the City is applying for a planning grant to do some studies to reduce the TDS at the treatment facilities.

In a subsequent communication with the CVV representative on January 6, 2016, staff was informed that the cost of the MRB water charged to the HDPP is \$1,074 per AF.

<b>cc:</b> Elena Miller Kerry Willis Dockets (97-AFC-1C)	<b>Signed:</b>
	<b>Name:</b> Abdel-Karim Abulaban