

DOCKETED

Docket Number:	97-AFC-01C
Project Title:	High Desert Power Plant (COMPLIANCE)
TN #:	210280
Document Title:	CORRECTED: ROC for phone conference with MWA and City of Victorville Representatives
Description:	(NOTE: Supersedes the document uploaded as TN# 210234) This is a report of conversation (ROC) for a phone conference between Energy Commission Staff and representatives of Mojave Water Agency (MWA) and City of Victorville that took place on December 22, 2015.
Filer:	AbdelKarim Abulaban
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	2/11/2016 3:28:44 PM
Docketed Date:	2/11/2016



Siting and Environmental Protection Division

FILE: (97-AFC-1C)

		PROJECT TITLE: High Desert Power Project	
<input checked="" type="checkbox"/> Telephone		<input type="checkbox"/> Meeting Location:	
NAME:	Abdel-Karim Abulaban	DATE:	12/22/2015
WITH:	City of Victorville and Mojave Water Agency representatives		
SUBJECT:	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 ability of MWA to allow up to 3,090 acre-feet per year (AFY) of adjudicated Mojave River Basin (MRB) water to be used for 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 this information in order to complete its analysis of the amendment petition filed with the Energy Commission by the project owner on October 30, 2015 to be allowed to use alternative water supplies to drought-proof the project for the remaining project life - about 18 years.

DISCUSSIONS:

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 HDPP relying on permanent allocation of up to 3,090 AFY of groundwater from the MRB would be materially inconsistent with the original conditions of approval and that the project would then be required to pay to replace that water on a 2:1 basis since the project use is consumptive. To avoid a contentious process likely involving a court ruling, MWA suggested that the project keep requesting SWP water for use at the project and for filling the project water storage injection bank. MWA also offered an additional source of imported SWP water from the



"Yuba Accord", that is available to MWA beginning this year to act as a fall-back source of backup water for the project.

2. MWA representatives also offered consideration of the potential 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. MWA stated that this arrangement would give the agency the flexibility to percolate the water wherever it is needed most in the basin and that a modification to the existing storage agreement with the City of Victorville would be required.
3. Free Production Allowance (FPA), which is the amount of water that can be produced by every user in the basin free of replacement assessment, 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.
4. 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 in a shortage condition where overall requests exceed the available SWP supply, MWA will allocate SWP water to all customers based on previous uses. 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.
5. The primary source of water for replenishment in the MRB is SWP.
6. 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 months ago, when the aqueduct had a break that took a few days to repair. Otherwise, the quality of the SWP water is generally good.
7. MWA representatives also informed staff that water delivery agreement (pursuant to MWA Ordinance 9) with the City of Victorville (retail water of SWP water to HDPP) required 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.
8. 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

CALIFORNIA ENERGY COMMISSION
REPORT OF CONVERSATION Page 3 of 3



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 (VWVRA) 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.

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