



Department of Energy
Western Area Power Administration
150 East Social Hall Avenue, Suite 300
Salt Lake City, UT 84111-1580

NOV 7 2012

Ms. Anne J. Castle
Assistance Secretary – Water and Science
Department of the Interior
1849 C Street, N.W.
Washington, DC 20240

(Sent via email: anne_castle@ios.doi.gov)

Dear Ms. Castle:

Western Area Power Administration (Western) supports the Department of the Interior's (DOI) implementation of the November High Flow Experiment (HFE). We appreciate the tremendous effort put forth by the Bureau of Reclamation (Reclamation), and many others, to implement the new HFE protocol.

Western estimates that the November HFE will result in about \$1.4 million in added power expense. The HFE and intervening flows in November will require the movement of water (about 128,000 acre-feet) from other months, which will reduce the capacity and energy available for Western's customers. The direct costs of the additional purchase power is a non-reimbursable expense and therefore not borne by Western's electrical customers. However, the reduction in Western's ability to offer capacity and energy in the months with reduced volume is an indirect cost borne by Western's electrical customers.

At the Technical Work Group meeting, DOI briefed stakeholders on the HFE. Various stakeholders expressed concern about moving from 8,000 cubic feet per second (cfs) flows in October to flows with a nightly minimum of 5,000 cfs. The technical team considered potential impacts of minimum flows and recommended that flows be increased to include fluctuations from 7,000 cfs to 9,000 cfs. Western agrees with the recommendation and believes this will improve the experiment and further the likelihood of achieving the desired experimental benefits on downstream resources. In the long run, this is beneficial to Western and its customers. Western would like to reiterate that this agreement on operations does not in any way change the minimum flows described in the 1996 Record of Decision nor does it represent a new de facto minimum flow.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darren Buck", is written over a faint, larger signature.

Darren Buck
Acting CRSP Manager

cc:

Mr. Larry Walkoviak
Regional Director
U.S. Bureau of Reclamation
Upper Colorado Regional Office
125 South State Street, Room 6107
Salt Lake City, UT 84138-1147