



Public Utility District No. 1 of Douglas County

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Via Electronic Filing

May 30, 2014

Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 1st Street N.E.
Washington, D.C. 20426

Subject: **Wells Hydroelectric Project – FERC Project No. 2149
Peak Reliability Corporation – Transmission Operating Directive to Reduce
Power Generation at the Wells Project**

Dear Secretary Bose:

Pursuant to License Order Article 403, Public Utility District No. 1 of Douglas County, Washington (Douglas PUD), licensee for the Wells Hydroelectric Project No. 2149 (Wells Project) respectfully submits notice to the Federal Energy Regulatory Commission (FERC) regarding two operating directives issued by the NERC Regional Reliability Coordinator, Peak Reliability Corporation (PEAK). Both of these operating directives are intended to address bulk electric system (BES) issues that are outside the control of Douglas PUD and that have a direct impact on the operation of the Wells Project and compliance with the Washington State Water Quality Standards for total dissolved gas.

License Article 403 states that Douglas PUD is required to notify the FERC whenever it deviates from its normal operating requirements. Notification related to this type of deviation is required to occur as soon as possible but no later than 48 hours after project operations have been temporarily modified due to an operating emergency beyond the control of Douglas PUD.

On Wednesday May 28, 2014 a large wildfire south of Wenatchee, Washington swept through a major transmission line corridor rendering four different wooden transmission lines inoperable including the Rocky Reach to Columbia 230 kV line, the Valhalla to Columbia #1 115 kV line, the Valhalla to Columbia #2 115 kV line, and the Hanna to Valhalla 115 kV line. These lines are used to transmit energy generated at various dams on the Mid-Columbia River including Douglas PUD's Wells Hydroelectric Project.

In response to the loss of these four transmission lines, Douglas PUD has been directed by PEAK to reduce power generation at the Wells Project in order to reduce the threat of transmission overload conditions at various points of transmission within the Mid-Columbia toward preserving the reliability of the BES. Regarding this matter, PEAK has issued two operating directives to Douglas PUD. The first directive was issued at 1704 hours on May 29th and the second directive was issued at 1031 hours on May 30th. The net result of these two operating directives has been a large reduction in the maximum generation capability of the Wells Project. The final directive issued on May 30th limits power generation at the Wells Project to no more than 441 MW, which is a substantial reduction in peak generating capability that before receiving these two directives averaged 720 MW.

The ordered reduction in power generation at the Wells Project has resulted in a large increase in the volumes of water being spilled including a peak spill event in excess of 70 kcfs during the evening of Thursday May 29th and the morning of Friday May 30th. The result of this emergency deviation from normal operating requirements has been an increase in total dissolved gas levels measured downstream of Wells Dam. At times, the increased spill has resulted in the Wells Project violating Washington State water quality standards for total dissolved gas.

Douglas PUD expects to continue to operate the Wells Project at a reduced power generation level for the next few days to a week while more than 70 wooden transmission structures damaged in the fire are repaired or replaced. Project operations under these conditions will continue to be dynamic, requiring Douglas PUD to spill more water than is required for fish passage or desired under the current fish and water quality operating plans.

In support of these short term emergency operating directives issued by PEAK, Douglas PUD will continue to implement the FERC and Washington Department of Ecology (Ecology) approved 2014 Gas Abatement Plan (GAP) and Spill Playbook when spilling volumes exceed 43 kcfs. The GAP and Spill Playbook both direct Douglas PUD to spill over 'loaded' units, to spill using a concentrated pattern of open spill gates, and to focus the concentrated spill toward the center of the river. These operational spill strategies have proven to be successful at reducing the generation of total dissolved gas at Wells Dam by encouraging the development of a surface oriented spillway jet in the Wells Dam tailrace. Douglas PUD will also be following the biological monitoring and numerical reporting requirements found in the 2014 GAP including monitoring for signs of gas bubble disease in adult fish at Wells Dam and in juvenile fish at Rocky Reach Dam should total dissolved gas levels exceed 125%.

Consistent with various requirements found throughout the license for the Wells Project, Douglas PUD is also providing this notification to Ecology, the National Marine Fisheries Service, the United States Fish and Wildlife Service, the parties to the Anadromous Fish Agreement and Habitat Conservation Plan, and the parties to the Aquatic Settlement Agreement.

If you have any questions or require further information, please feel free to contact me at (509) 881-2208 or sbickford@dcpud.org.

Sincerely,



Shane Bickford
Natural Resources Supervisor

Cc: Thomas J. LoVullo – FERC
Charlie McKinney, Patricia Irle – Ecology
Ritchie Graves, Bryan Nordlund – NMFS
Jessica Gonzales, Steve Lewis – USFWS
HCP Coordinating Committee
Aquatic Settlement Work Group
Mr. Andrew Gingerich – Douglas PUD
Mr. Chas Kyger – Douglas PUD

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