POTTER VALLEY IRRIGATION DISTRICT
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March 18, 2026 **Via Electronic Submittal (E-File)**

Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
Division of Hydropower Administration and Compliance
888 First Street, N.E.
Washington, DC 204426

RE: MOTION TO INTERVENE AND COMMENTS; for Potter Valley Project No. 77-334 by the Potter Valley Irrigation District in response to the January 30, 2026 filing by Pacific Gas and Electric Company titled Potter Valley Hydroelectric Project FERC No.77 Water Year 2026 Temporary Minimum Instream Flow Amendment Request.

Dear Secretary Reese,

The Potter Valley Irrigation District (PVID) requests intervenor status and to make comments regarding Pacific Gas and Electric Company's (PG&E) January 30, 2026 filing with the Federal Regulatory Energy Commission (FERC) titled Potter Valley Hydroelectric Project No. P 77 Water Year 2026 Temporary Minimum Instream Flow Amendment Request.

PG&E requests that, due to decreased Lake Pillsbury storage capacity and to ensure dam safety, water year 2026 Releases at:

-E-2 (Scott Dam) will be reclassified as a Critical Water Year Type. In practice, the E-2 flows will be the combined releases for E-11 (below Cape Horn Dam) and E-16 releases (which consists of both the East Branch Russian River (EBRR) and PVID's contracted water deliveries).

-If Lake Pillsbury is spilling EBRR diversions will follow license flows based on E-2/E-16 WY types.

-The 2026 Temporary Variance Amendment PG&E describes that once Lake Pillsbury spill ends, EBRR diversions will be set initially at 25 cfs and then will be adjusted between 25 cfs and 5 cfs based on a flexible management flow release strategy. The management strategy proposed by PG&E will include hydrologic forecasting tools and runoff forecasts to inform Lake Pillsbury

reservoir storage forecasts and ensure dam safety thresholds are maintained. PG&E will also use historical water temperature data and past CE-QUAL-W2 water temperature modeling results, and additional model runs, as needed, to inform how EBRR diversions will impact the Lake Pillsbury reservoir cool-water pool. The water temperature of releases to the Eel River are measured at E-2 during the summer.

-PG&E further states that when Scott Dam stops spilling after May 15, PG&E will begin meeting with the Agencies and stakeholders in the Drought Working Group (DWG) to determine if diversions to the EBRR, as measured at E-16, (minus the PVID contracts deliveries), should be adjusted. PG&E will aim to maintain 25,000 AF of storage in Lake Pillsbury on October 1, 2026.

As in our previous years responses to PG&E applications for a Temporary Variance to the license, PVID reasserts that PG&E has very limited discretion to restrict PVID's contracted deliveries and certainly there is nothing in the contract between PG&E and PVID that describes late summer or fall storage levels at Lake Pillsbury, or water temperature at E-2, being a reason to limit delivery of our 50 cfs between April 15 and October 15 unless cumulative inflow to Lake Pillsbury is less than 25,000 AF by April 1. As of March 17, 2026 cumulative inflow into Lake Pillsbury is 323,882 AF. We see no reason, at this point in the spring with the continuing inflow to Lake Pillsbury, that the 25 cfs minimum EBRR instream flow will need to be reduced as the water year progresses.

PVID has voluntarily moved to demand-based delivery requests in past years in an effort to support the retention of more water in Lake Pillsbury, and we are willing to do so again. However, this voluntary action is in no way a waiver of our contractual rights with PG&E. Similarly, our offer of comments and not a protest of the Temporary Variance request is also not a waiver of those contractual rights.

As mentioned previously when a Temporary License Variance has been requested by PG&E reductions to the EBRR minimum instream flow requirements at E-16 negatively impacts water supply reliability within the entire Russian River watershed. The California State Water Resources Control Board (SWRCB) has granted Appropriative water rights to hundreds of diverters who use water from Potter Valley Project all the way downstream to the Pacific Ocean. The water rights granted to diverted water that flows in the EBRR through Potter Valley is then stored in Lake Mendocino, providing domestic and agricultural water for over 600,000 people. The diverted water is also required to maintain minimum instream flows in the Russian River

determined by the National Marine Fisheries Service (NMFS) to be protective of listed species of anadromous fish under the Endangered Species Act.

Notwithstanding the impacts of decreased water supplies necessitated by the above-described flow changes, PVID acknowledges PG&E's efforts in taking a more measured and reasonable approach for the 2026 Temporary Variance. However, because last year's variance request was not approved until August, Lake Pillsbury storage was reduced to the point that when the approval was granted PG&E abruptly shut EBRR flows to 5 cfs causing serious impacts to irrigators in Potter Valley and immediately curtailing the rest of our summer and fall irrigations. PVID bases water deliveries to our customers on the predictability of water that is available in the EBRR. Without the certainty of a specific amount of water PVID cannot respond to delivery requests and the farmers in Potter Valley will not have the assurance of a reliable water supply. We are hopeful that with a timely approval of this 2026 Temporary Variance reductions in EBRR flows below 25 cfs will not be necessary and, if needed, will be made in small incremental steps based solely upon observed changes in water supply conditions as the 2026 season progresses.

For these reasons PVID formally requests INTERVENOR STATUS in the matter of FERC No. P-334. We are hopeful that the proposed 2026 Temporary License Variance will successfully balance the operational needs of PG&E, the ecological needs of aquatic species, and the critically important water supply needs of PVID's agricultural customers.

Respectfully Submitted,

Janet K.F. Pauli

Janet K.F. Pauli, President