

Davis Hydro, LLC.

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March 23, 2010

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N. E.
Washington, D.C. 20426

Re: P-606 Request for Flow and temperature data from PG&E

Dear Ms. Rose:

The damage that will be done to downstream listed species critical habitat if the Kilarc Project is interrupted is subject to question. In your Draft Environmental Impact Statement on Decommissioning P-606, you cited a PG&E 2003 Water Quality Study that found,

The return water from the powerhouse tailrace reduces mean stream temperature by up to 4°F relative to the water temperature in the bypassed reach immediately upstream of the Kilarc powerhouse. (DEIS p.70)

This cold water travels downstream and lowers the water temperature slightly in critical habitat areas for steelhead and salmon in the summer. To better understand what will happen were the Kilarc Powerhouse removed, we are now collecting temperature data and building a detailed stream flow and temperature model. To verify the model and increase its accuracy we need as much data as possible on temperatures, streamflows, and diversions. In contacting PG&E for this information they have indicated that the data is available, but they would prefer it to be requested through the FERC. Therefore,

We request that FERC request PG&E to release to us a report and data at the Kilarc site to supplement our ongoing temperature monitoring study.

Data Request

Would you please request PG&E to release to us.

- Available flow gauge data from the two flow gauges in the Kilarc canal in machine readable format from June 2010 continuous as our study progresses through 2013,
- Any temperature data (air or water) available at the Kilarc Project covering the same period.

- Available similar data from the year 2003, especially detail available covering March through September 2003. Specifically, the water temperature data 20 minute data taken at the nine stations used in PG&E's water quality study of the waters of the Kilarc Development.
- Any other data PG&E may have and feel appropriate to better understand the hydrologic/thermal/electrical operation of the Old Cow.

We also request:

- A copy of the cited 2003 Water Quality Study. – Electronic is preferred. A loan of paper copy would be fine if available.
- Informal referral by PG&E to any other data they may know of that may bear on understanding the temperature/flow regimes in the Old Cow watershed.

One of the effects of the hydropower is the removal of heat from the water that would otherwise be generated by turbulence by turning it into hydropower. This effect is recognized as small, but of interest as it benefits fish at all PG&E sites. To understand this and the operation of the site better, we request

- records of forebay elevation and power generation at the Kilarc powerhouse during the same periods.

These generation data may be more sensitive to PG&E for their own reasons, and are not necessary, and we could forego them as PG&E wishes.

We are pleased to work with PG&E to facilitate data formats so as to minimize any work. We understand that these data are decoded field data and are subject to all field collection problems, inaccuracies, and hiatuses. Specifically, we understand that there have been systemic and significant transient canal leaks during the periods of interest and given the inaccuracies of the downstream gauge, no systemic conclusions will be inferred from the differences. If any clarification is needed, please contact me at 530 753-8864.

Respectfully,



Richard Ely
Davis Hydro, LLC

cc: all P-606