

SYSTEM OPERATIONAL REQUEST: #2022-1

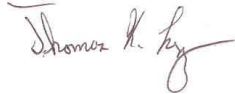
Walla Walla District

*The following State, Federal, and Tribal Salmon Managers have participated in the preparation and support this
SOR: Columbia River Inter-Tribal Fish Commission/Confederated Tribes of the Umatilla Indian Reservation,
Nez Perce Tribe, Spokane Tribe of Indians, Yakama Nation, Washington Department of Fish and Wildlife, and
Oregon Department of Fish and Wildlife*

TO:

Corps of Engineers Northwestern Division (NWD) WALLA WALLA DISTRICT (NWW)	
TO:	
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Tribal Liaisons: Jr. Inglis (NWD), Dean Holecek (NWW)



FROM: Tom Lorz, FPAC vice-chair

DATE: January 12, 2022

SUBJECT: Clarifying the frequency of zero-generation operations of the four Lower Snake River dams

SPECIFICATIONS: We request that the following clarification be used to guide the frequency of zero-generation operation implementation:

- Zero-generation at any single dam on the Lower Snake River will be implemented no more than 1 out of every 3 to 5 days, between the date of initiation (see SOR 2021-6) until the last day of February.

JUSTIFICATION:

The Term Sheet for Stay NWF v. NMFS, ECF 2411-1 (3:01-cv-00640-SI) includes implementation of zero generation operations per date and abundance criteria described in SOR 2021-6. These criteria were met on December 17 in 2021. Zero generation operations post December 17th should be consistent with anticipated usage of “one out of every 3 to 5 days at each project” as described in the 2020 CRSO BA p 2-63 (pdf p. 98):

*“Between October 15 and February 28, when power market conditions warrant and when river conditions make it feasible, power generation at Snake River projects may cease during nighttime hours, most commonly implemented between 2300 and 0500 hours when demand for power is lowest and other renewable resources are generating surplus power (or both). This operation will end no later than 2 hours before dawn between October 15 and November 30. During the operation between December 15 and February 28, daytime hours will no longer be excluded from this operation, and up to 3 hours of daytime cessation will be part of the Proposed Action. This shift in current operation would allow operators to save water in low demand periods to use for hydropower generation during higher demand periods. The timing and need for ceasing power generation during this period of time is difficult to predict. However, based on previous operations between December 15 and February 28 and during nighttime hours only, **Bonneville estimates the use of this operation may occur one out of every 3 to 5 days at each project.** See the WMP21 for additional details.” (emphasis added)*

Actual implementation by Bonneville Power Administration (BPA) during winter 2020-2021 or winter 2021-2022 does not conform with a reasonable interpretation of “one out of every 3 to 5 days” (i.e., 33% - 20% of days). Rather, implementation has been as much as every day between December 22, 2021 and January 8, 2022. At past TMT meetings, BPA has repeated that their intent was to match historical usage of this operation, but the Proposed Action and other guiding documents do not adequately describe historical usage. Instead, the language refers to one out of every 3 to 5 days (see excerpt from 2020 BA above). Operating in extreme exceedance of this description is inconsistent with the Proposed Action.