Pacific Gas and Electric Company®

Power Generation

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October 10, 2024

Via Electronic Submittal (E-File)

Frank L. Blackett, P.E., Regional Engineer
Federal Energy Regulatory Commission
Division of Dam Safety and Inspections
100 First Street, Suite 2300
San Francisco, CA 94105-3084

RE: Drum-Spaulding Hydroelectric Project, FERC No. 2310-CA
Lake Spaulding Development, NATDAM Nos. CA00358, CA83187, CA83188
PRV A Discharge Horn, Lower Tunnel Butterfly Valve Assembly, and Discharge Chamber Columns – Repair Status Update and Extension of Time Request

ENCLOSURE CONTAINS CUI//CEII – DO NOT RELEASE

Dear Frank L. Blackett:

This letter presents a status update and request for extension of time to complete repairs to Pacific Gas and Electric Company's (PG&E) water conveyance and power generating facilities near Lake Spaulding. The Lake Spaulding development is part of PG&E's Drum-Spaulding Hydroelectric Project, Federal Energy Regulatory Commission (FERC) No. 2310. In accordance with Title 18 of the Code of Federal Regulations, Section 12.40(d), this letter includes a reasoned basis for the extension of time request.

Background

Lake Spaulding supplies water for downstream power generation and consumptive use. Intake structures and a tunnel through the dam's left abutment carry flows from the reservoir to PG&E's Spaulding No. 1 and No. 2 Powerhouses, located immediately downstream of the dam. From the powerhouses, water is discharged into the Drum and South Yuba Canals, which convey water to downstream powerhouses and provide deliveries to the Nevada Irrigation District (NID) and the Placer County Water Agency (PCWA). NID and PCWA distribute the water to their customers for agricultural, municipal, and other consumptive uses.

In an April 10, 2024, letter to your office, PG&E reported on damage to components of the water conveyance and power generating systems associated with the Spaulding No. 1 powerhouse. The damaged components include both of the powerhouse's pressure regulator valve (PRV) discharge horns, the lower power tunnel intake's butterfly valve (BFV) actuation assembly, and two concrete columns located in the discharge chamber beneath the powerhouse.

Upon discovery of the damaged PRV discharge horns, PG&E closed the intake valves, drained the power tunnel, and initiated repairs. While the Spaulding power tunnel system was dewatered, no conduit from Lake Spaulding was available to provide flow to either of the Drum or South Yuba Canals, which prevented water deliveries to NID and PCWA.

Status of Repairs

To limit impacts to downstream water users and restore flows at the soonest feasible date, PG&E prioritized repairs to the damaged water conveyance and powerhouse facilities in a phased approach. PG&E completed repairs to PRV A, replaced the lower power tunnel BFV actuator assembly, and constructed new columns in the discharge chamber beneath the powerhouse. Upon completion of this first phase of work, PG&E returned the generating system to limited service on July 28, 2024.

Because of the urgent need to restore flows for downstream water deliveries, PG&E crews worked 24 hours per day, 7 days per week to hasten the repairs. To the extent practicable, PG&E coordinated its work schedules and outage windows with NID and PCWA to limit impacts to their operations and water deliveries. PG&E also coordinated its repair efforts with you and your staff through email correspondence, telephone calls, and meetings. A summary of PG&E's communications and open commitments related to FERC's review of the planned repairs is enclosed with this letter (Enclosure 1). As noted in the enclosure, PG&E received FERC authorization prior to proceeding with the planned repair activities and prior to implementing any changes from the authorized scope. PG&E appreciates FERC's expedited reviews and support for the accelerated work schedule.

Although PG&E successfully completed the work to safely return limited flows through the Spaulding No. 1 Powerhouse, additional work is required to release the project to full operation. Significant effort remains to replace the PRV B discharge horn and finish several lower priority tasks for final acceptance of the PRV A discharge horn. Additional work also remains to remove portions of the damaged concrete columns and protect the new columns and discharge chamber from long-term wear and deterioration.

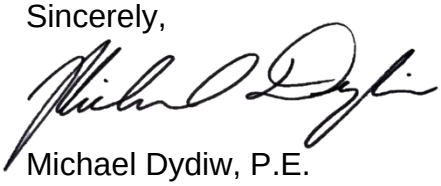
Updated Plan and Schedule for Remaining Repair Work

PG&E anticipates remobilizing crews to perform the remaining repair work in the late winter or early spring of 2025, after safe and reliable access to the powerhouse is restored following the upcoming winter and when water demands are low. PG&E intends to complete the repairs in accordance with the FERC-authorized plans previously coordinated with your office. Based on experience with the first phase of repairs, PG&E anticipates the remaining work will take approximately 4 months to complete. PG&E has coordinated the proposed repair dates with NID and PCWA and believes the dates support the least impact to water deliveries.

Upon completion of the repairs, PG&E plans to prepare a final construction report, including as-built drawings, to document and provide a formal record of the work. In PG&E's April 10, 2024, letter, PG&E proposed to submit an FCR for repairs to the PRV A discharge horn, lower tunnel BFV assembly, and the discharge chamber by September 10, 2024, and to submit an FCR for the PRV B discharge horn by February 12, 2025. However, because work on the PRV A and PRV B discharge horns and the discharge chamber is not yet complete, PG&E has revised its plans for the FCR. PG&E now plans to prepare a single FCR for all of the repairs after completion of the remaining work in 2025. PG&E respectfully request an extension of time to submit the FCR to FERC within 90 days after completing the remaining repairs, or by December 15, 2025, whichever is earliest.

Should you have technical questions concerning this matter, please contact Scott Clowser, dam safety engineer for PG&E, at (530) 889-3131. For general questions, please contact Jackie Pope, license coordinator for PG&E, at (530) 254-4007.

Sincerely,



Michael Dydiw, P.E.
Deputy Chief Dam Safety Engineer

Enclosure: **CUI//CEII – DO NOT RELEASE**

1. Extension of Time Request Regarding Damaged Components of the Power Generating System