

Electronically filed October 4, 2019

Kimberley D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Subject: Cutler Hydroelectric Project (FERC Project No. 2420)
Clarification in Response to FERC's Scoping Document 2**

Dear Secretary Bose:

PacifiCorp is the licensee of the Cutler Hydroelectric Project Federal Energy Regulatory Commission (FERC) No. 2420 (Project), located on the Bear River in Cache and Box Elder counties, near Logan, Utah. To initiate the current relicensing proceedings, on March 29, 2019 PacifiCorp submitted the Pre-Application Document (PAD); on August 29, 2019, PacifiCorp submitted a Request for Approval for a 2019 Drawdown to facilitate preliminary relicensing studies, and on September 11, 2019, PacifiCorp submitted its Proposed Study Plan (PSP).

On September 13, 2019, FERC issued Scoping Document 2 (SD2), the intent of which is to describe the proposed actions and alternatives for the Project, explain the environmental analysis (EA) process, and submit a revised list of issues to be addressed as part of the EA (based on scoping comments submitted at or after the June 2019 FERC scoping meetings, during the public comment period on the PAD and the associated Scoping Document 1). PacifiCorp has reviewed SD2, and finds items in need of clarification and/or correction.

Clarification of Table 1 in SD2

Table 1 in SD2 is not representative of the amended (from the original text of the 1994 License articles) operational range as required by the 2002 License amendment Order of Article 401, which established license conditions for a revised operational flow regime.

PacifiCorp would like to clarify that the table included below, Table A represents the current approved operational flow regime, which has been in use since 2002.

TABLE A CURRENT OPERATING FLOW REGIMES FOR CUTLER RESERVOIR

TIME PERIOD	NORMAL RESERVOIR OPERATING RANGE (FEET)	TOLERANCE (FEET)	TOTAL RANGE (OPERATING + TOLERANCE)	TARGET PERCENTAGE
March 1 – Dec. 1	4,407.5 to 4,406.5	±.25	1.5 feet	95%
Dec. 2 – Feb. 28	4,407.5 to 4,406.0	+.25, -.0.5	2.25 feet	90%

Clarification of Section 3.2 and Table 2 of SD2

Additionally, PacifiCorp would like to clarify text in section 3.2 and Table 2 of SD2. Section 3.2 of SD2 states:

...PacifiCorp proposes to modify the allowable reservoir elevation range, increase the tolerance range, and reduce the target percentage by 5 percent year-round as shown in Table 2 below (Table 2)...

Table 2. Proposed reservoir Elevation Fluctuation Evaluation range.

<i>Period</i>	<i>Operation range (elevation in feet)</i>	<i>Tolerance (feet)</i>	<i>Target percentage</i>
<i>January 1- December 31</i>	<i>4,407.5 – 4,395.0</i>	<i>± 0.5 (+0.5 @ 4,408.0) (-0.5 @ 4,394.5)</i>	<i>90%</i>

PacifiCorp is not proposing to modify the operation range as shown in Table 2 of SD2. Instead, PacifiCorp is looking to analyze the full mechanical operation range in order to identify, if possible, an operational range that would allow the Project to be responsive to short-term energy demands and load changes that have resulted from grid integration with intermittent resources such as solar and wind. In order to inform a potential modification to the current license operation range, PacifiCorp is proposing to evaluate a range of elevations during the study process, which will then be analyzed during the environmental analysis. The proposed range of elevation for evaluation purposes is shown in Table B below, which represents the full mechanical limits of potential operating ranges; the full range is *not* being proposed for future operations. A proposed operating range will be described in the license application based on the results of careful study and ongoing consultation with stakeholders.

TABLE B PROPOSED RESERVOIR ELEVATION EVALUATION RANGE

PERIOD	ELEVATION EVALUATION RANGE*	TOLERANCE (FEET)	TARGET PERCENTAGE
January 1 – December 31	4,407.5 – 4,395.0	± 0.5 (+0.5 @ 4,408.0) (-0.5 @ 4,394.5)	90%

*Table 2 in SD2 called this column "Operation Range," which may have added some confusion.

Kimberly D. Bose, FERC
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Clarification of FERC's Letter Providing Scoping Document 2
October 4, 2019

PacifiCorp appreciates the opportunity to clarify this for the record. Please contact Eve Davies, Cutler Licensing Project Manager, at 801-220-2245 or at Eve.Davies@pacificorp.com if you have any questions about this letter.

Sincerely,



Mark Sturtevant
Vice President, Renewable Resources

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Encl:	Clarification in Response to FERC's Scoping Document 2 – Public
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