

September 7, 2005  
PKWD-05-036

Ms. Magalie R. Salas  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20427

Dear Secretary Salas:

Subject:     **PACKWOOD LAKE HYDROELECTRIC PROJECT  
FERC DOCKET NO. 2244-012  
CLARIFICATION REGARDING WAIVER OF ARTICLE 37**

Reference:   Letter dated August 22, 2005 from J.W. Baker to Magalie R. Salas,  
              "Submittal of Revised Study Plans"

On August 22, 2005 Energy Northwest filed Revised Study Plans for the Packwood Lake Hydroelectric Project and requested a waiver of Article 37 for May and June 2006, so that we may raise the lake elevation above the maximum of 2858.5 ft MSL and create an overtopping event to support performance of four of the studies. Subsequently, Commission staff asked for clarification related to the overtopping event, and how overtopping could affect performance of the recreation resources surveys on lower Lake Creek.

A waiver of Article 37 is needed for May and June 2006 to allow Energy Northwest to (1) operate the project reservoir at levels greater than the seasonal limit of 2857 ft ± 6 inches MSL and (2) greater than the maximum operating water surface level of 2858.5 ft MSL (top of spillway crest). The plan would be to fill the reservoir to near spillway height and hold it there (if necessary) for appropriate inflows. Once the desired inflow is detected, the Project power operation would either be reduced or shutdown, which will cause the lake's natural inflow to quickly overtop the drop structure. In order to achieve the desired flow down Lake Creek, we will need to allow the natural inflow to exceed the maximum reservoir level of 2858.5 ft MSL (the spillway crest of the drop structure) by at least 1 foot. After the study measurements have been completed, normal operations will resume, and overtopping of the drop structure and flow down Lake Creek will gradually decrease. Operating data from natural spill events indicates that the reservoir level should return to the spillway crest within a few days (see Appendix E of the Pre-Application Document, Supplement No. 1).

Ms. Magalie R. Salas

Page 2

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As stated in the Revised Lake Creek Instream Flow and Habitat Assessment Study Plan, it is estimated that it will take approximately three days of releases over the drop structure to secure the necessary measurements on lower Lake Creek. The Revised Large Wood Study Plan needs a flow similar to a bankfull event of 285 cfs; however, instream flow measurements that allow modeling up to 260 cfs (the Project's water right) can be taken at flows of 100 to 150 cfs. Although there may be some period of time when there are releases over the drop structure in advance of the needed flows, we do not expect to overtop the drop structure for an extended period of time.

The Revised Recreation Resources Study Plan has scheduled survey dates on lower Lake Creek on June 10, June 13, June 21, and June 25, 2006. Should the overtopping event occur on any of these dates, we will reschedule the survey to a similar day (weekday or weekend day) in June 2006, with the agencies' concurrence.

If you have any questions or require additional information regarding this matter, please contact Ms. Laura Schinnell at (509) 372-5123.

Respectfully,

A handwritten signature in black ink, appearing to read "J.W. Baker". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J.W. Baker, Vice President  
Energy/Business Services