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April 23, 2020
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The Secretary
Federal Energy Regulatory Commission
Mail Code: DHAC, PJ-12.3
888 First Street, N.E.
Washington, DC 20426

Subject: **PACKWOOD LAKE HYDROELECTRIC PROJECT
FERC DOCKET NO. P-2244
NOTIFICATION OF ANTICIPATED DEVIATION FROM LAKE LEVEL
REQUIREMENT PARTIALLY DUE TO THE COVID-19 PANDEMIC**

Reference: USFS 4(e) Condition No. 4 Packwood Lake Elevations and Annual Project Maintenance

On October 11, 2018 the Federal Energy Regulatory Commission (FERC) issued a 40-year operating license to Energy Northwest (EN) for the continued operation of the Packwood Lake Hydroelectric Project P-2244 (Project). Incorporated into the license was USDA Forest Service (Forest Service) 4(e) Condition No. 4 Packwood Lake Elevations and Annual Project Maintenance.

A portion of Forest Service Condition No. 4 states, *“The Licensee must maintain a minimum Packwood Lake elevation of 2856.5 feet MSL between May 1 and September 15 of each year.”*. Under “typical” natural circumstances, EN is able to adhere to this operational standard on an annual basis. 2020, however, has proven to be an anomalous year due to two specific items:

1. Lower than Normal Temperatures and Lack of Spring Rains – The 2019/2020 winter created a solid snowpack to provide more than enough run-off to facilitate reaching and exceeding the summer lake elevation requirement. That said, the spring of 2020 has been unseasonably cold at lake elevation. This combined with lower than typical rainfall amounts has resulted in limited melting of the snowpack and associated inflows to the lake have remained low.
2. Total Plant Shutdown Not Currently an Option Due to COVID-19 – The lower than normal inflows into the lake have required EN to scale back operations in an attempt to increase the lake elevation to the requisite number by May 1st. Under normal circumstances, EN

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would shut down the Project to allow for the most rapid lake level increase possible. A shutdown would require off-site staff and consultants to travel to Packwood to conduct a fish salvage effort in the Project stilling basin, tailrace and tailrace slough. Given the current COVID-19 pandemic and the associated travel and safety restrictions that are in place, a fish salvage effort would not be achievable. As such, the Project has been operating at 2MW since April 7, 2020 which is as low as the Project can feasibly operate in an effort to bring the lake elevation up.

As of April 23, 2020, the Packwood Lake elevation was approximately 2855.15 feet MSL and lake inflows had increased to approximately 110 cfs. These conditions create a situation where EN may be able to adhere to the current Condition requirement of 2856.5 feet MSL by May 1st. Given the continued forecast for the next week of cool temperatures and limited precipitation in the Packwood area, the potential also exists for the Project to miss this required date and need an additional week or 10 days to facilitate the lake reaching the required elevation. In addition to the aforementioned issues, we are approaching a date where our bypass flow rates (per the License) will need to increase from 7 cfs to 15 cfs into Lake Creek. This increase will obviously further hinder EN's ability to bring up the lake level.

EN is committed to doing everything within its current operational ability to reach 2856.5 feet MSL as soon as possible. We also view it as our responsibility to notify FERC and the Resource Agencies Committee (RAC) of the potential for a deviation. As such, we are filing this letter with FERC and formal notification and will also be distributing to the RAC for their information. It is understood that if this deviation does occur, EN is responsible for filing a Deviation Report with FERC once the lake elevation reaches the required level. We will also follow-up with the RAC to inform them of the length of the deviation, if one occurs.

If you have any questions or require additional information regarding this matter, please contact me at 509.378.9755 or kwilliams@energy-northwest.com.

Respectfully,



Ken Williams
Supervisor, Hydro & Wind Projects

cc: Dave Olson, USFS
Diane Hopster, USFS
JD Jones, USFS
Cory Warnock, McMillen Jacobs Associates
Resource Agencies Committee
Doug Johnson, FERC (2 hardcopies)

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