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Click Next to begin the Comment Form.

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## Commenter Information (Optional)

Before including your address, telephone number, electronic mail address, or other personally identifiable information in your comments, please be aware that because of federal disclosure requirements your entire comment (including your personally identifiable information) may be made publicly available at any time. While you can ask us to withhold your personally identifiable information from public review, we will comply with all applicable disclosure requirements, and cannot guarantee that we will be able to do so.

### 1. Name

### 2. Email

### 3. Please let us know if you would like to:

- Be added to the 7.D. email list (enter email in Question 2)
- Provide feedback regarding your experience using this Form (enter email in Question 2)

### 4. Organization/Entity

Colorado River Energy Distributors Association (CREDA)

5. Please identify the sector that most closely describes your entity:

- Local Government
- State Government
- Tribal Government
- Federal Government
- Agricultural Water Provider/Association
- Municipal Water Provider/Association
- Non-Governmental Organization
- Academic Institution
- Non-Profit Association of CRSP Firm Electric Ser

### General Comments on the Draft Report

Please provide your overall feedback on the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)  
 ([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

6. Please respond to the following statements:

|   | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|---|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| The Draft Report is understandable.           | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| The Draft Report's conclusions are supported. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

## 7. Please provide general comments on the Draft Report:

*(4,000 character limit)*

CREDA restates comments submitted on April 30, 2020 that hydropower be added as one of the Operational Topics described in the 7.D. Report and included in the Appendix A. One of the goals of this Report is to review "the effectiveness of the three stated purposes of the 2007 Interim Guidelines" (webinar 3/24 and 3/31/2020). One of the stated purposes is to "improve Reclamation's management of the Colorado River..." As the largest wholesaler of water and second largest producer of hydropower in the United States, Reclamation's management of the Colorado River is deficient without the inclusion of Hydropower in the Operational Topics portion of the Report, and the inclusion of hydropower data along with water data included in Appendix A.

## Section 1: Introduction

Refer to Section 1, page 1 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

## 8. Please respond to the following statement:

|  | Strongly<br>Agree     | Agree                            | Neutral               | Disagree              | Strongly<br>Disagree  |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Section 1 is clear and understandable. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

## 9. Are there any errors or is critical information missing in Section 1?

- Yes
- No

## 10. Please provide comments on Section 1 that support your responses above:

*(4,000 character limit)*

Paragraph 3 repeatedly refers to Reclamation's "operational experience". Hydropower production is integral to the storage and delivery of water from Colorado River resources. A

report on Reclamation's operations is incomplete without inclusion of hydropower information and data. See also supporting comments below.

## Section 2: Background on the Development of the Guidelines

Refer to Section 2, pages 2-3 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

11. Please respond to the following statement:

|  | Strongly Agree        | Agree                            | Neutral               | Disagree              | Strongly Disagree     |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Section 2 is clear and understandable. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

12. Are there any errors or is critical information missing in Section 2?

Yes

No

13. Please provide comments on Section 2 that support your responses above:

*(4,000 character limit)*

Paragraph 3, page 2 includes the Basin States' letter as a critical piece of the background of development of the Guidelines. As a critical piece of the basis for the Guidelines, the letter specifically identifies and notes the hydropower resource as follows: "It will increase the risk of Lake Powell falling below the minimum elevation for generation of electrical power, thus jeopardizing a critical source of revenues for several environmental and Endangered Species Act compliance programs important to the Department of Interior, the Bureau of Reclamation and the Colorado River Basin States." Page 3 notes that minor impacts to the "power resource" were anticipated through operation of the Guidelines. The Report is insufficient unless it includes specific data reporting on actual hydropower projected, and actual, operations under the Guidelines.

## Section 3: Purpose of the Guidelines and Common Themes

Refer to Section 3, pages 4-5 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

14. Please respond to the following statement:

|  | Strongly Agree        | Agree                            | Neutral               | Disagree              | Strongly Disagree     |
|--|-----------------------|----------------------------------|-----------------------|-----------------------|-----------------------|
| Section 3 is clear and understandable. | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

15. Are there any errors or is critical information missing in Section 3?

Yes

No

16. Please provide comments on Section 3 that support your responses above:

*(4,000 character limit)*

Bullet 1 of "Common Themes" reinforces CREDA's comment that Reclamation's management of the Colorado River includes not only water storage and water supply, but "power production". As the Report is intended to provide actual operational and management experience and data, it should recite power production data as well as the water metrics already included.

## Section 4: Complementary Activities Since Adoption of the Guidelines

Refer to Section 4, pages 5-9 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

17. Please respond to the following statement:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 4 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

18. Are there any errors or is critical information missing in Section 4?

- Yes
- No

19. Please provide comments on Section 4 that support your responses above:

*(4,000 character limit)*

\*General Comment: Suggest that "Complementary" be revised to "Related" or "Associated". "Complementary" is a subjective description that may not be an appropriate description for all the cited activities. \*Page 7, paragraph 1: Suggest retaining only the first two sentences of this paragraph, which clearly describe purpose and need. The remaining sentences of this paragraph are limited (which "include") and subjective in what is NOT included with them. For the purposes of this Report, the first two sentences are sufficient. \*Page 7, paragraph 3: Reference and description of the DCPs are appropriate. Attachment A-1 of the DCPs clear support the integral nature of hydropower to fundamental DCP and Guidelines purposes: " 2. Maintain the ability to generate hydropower at Glen Canyon Dam so as to protect: a. Continued operation and maintenance of the Initial Units and participating projects authorized under the 1956 Colorado River Storage Project Act, as amended ("CRSPA"); b. Continued funding and implementation of environmental and other programs that are beneficial to the Colorado River System; c. Continued electrical service to power customers, including municipalities, cooperatives, irrigation districts, federal and state agencies and Native American Tribes, and the continued functioning of the western Interconnected Bulk Electric System that extends from Mexico to Canada and from California to Kansas and Nebraska; and d. Safety contingencies for nuclear power plant facilities within the Colorado River Basin." \*Page 9, section 4.4, first sentence: Suggest including "Western Area Power Administration" to be consistent with footnote 3 of the Report.

## Section 5: Approach to the Review of the Guidelines

Refer to Section 5, page 10 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

20. Please respond to the following statement:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 5 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

21. Are there any errors or is critical information missing in Section 5?

- Yes
- No

22. Please provide comments on Section 5 that support your responses above:  
*(4,000 character limit)*

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## Section 6: Significant Considerations Based on Scope and Approach Comments

Refer to Section 6, pages 10-13 of the Draft Report  
([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)  
([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

23. Please respond to the following statement:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 6 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

24. Are there any errors or is critical information missing in Section 6?

Yes

No

25. Please provide comments on Section 6 that support your responses above:

*(4,000 character limit)*

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## Section 7: Implementation of the Guidelines

Refer to Section 7, pages 13-39 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

26. Please respond to the following statement regarding Section 7.1 - Overview of Lake Powell and Lake Mead Conditions:

|  | Strongly Agree        | Agree                 | Neutral               | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Section 7.1 is clear and understandable. | <input type="radio"/> |

27. Are there any errors or is critical information missing in Section 7.1?

Yes

No

28. Please provide comments on Section 7.1 that support your responses above:

*(4,000 character limit)*

Lake elevations are a critical piece of information in this Report. This section discusses the relationship of operation under the Guidelines to elevations and the relationship of drought/water use to elevations. Lake elevations also determine and impact hydropower production as a function of head. This section should include text describing that relationship, followed by the same periodic data elements for energy generation as reported for water data through the remainder of section 7.

29. Please respond to the following statement regarding Section 7.2 - Determination of Lake Powell and Lake Mead Operations:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 7.2 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

30. Are there any errors or is critical information missing in Section 7.2?

- Yes
- No

31. Please provide comments on Section 7.2 that support your responses above:  
(4,000 character limit)

See comment on section 7.1 above. As noted on page 17, "it is informative to reflect back on those projections of what might occur and compare them to what actually occurred". Depending on lake elevations, as well as operations under the Guidelines (including experimental operations as described in Appendix A), hydropower production data as anticipated under the Guidelines versus actual operations, should be included in the Report. And on page 19: "These topics include the interaction between projections and elevation thresholds, and timing complexities related to monthly release schedules and the overlapping...Lake Powell and ...Lake Mead operations."

32. Please respond to the following statement regarding Section 7.3 - Coordinated Operation of Lake Powell and Lake Mead:

Strongly Agree    Agree    Neutral    Disagree    Strongly Disagree

Section 7.3 is clear and understandable.

              

33. Are there any errors or is critical information missing in Section 7.3?

- Yes
- No

34. Please provide comments on Section 7.3 that support your responses above:

*(4,000 character limit)*

35. Please respond to the following statement regarding Section 7.4 - Lake Mead Operations:

Strongly Agree    Agree    Neutral    Disagree    Strongly Disagree

Section 7.4 is clear and understandable.

              

36. Are there any errors or is critical information missing in Section 7.4?

- Yes
- No

37. Please provide comments on Section 7.4 that support your responses above:

*(4,000 character limit)*

38. Please respond to the following statement regarding Section 7.5 - Intentionally Created Surplus:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 7.5 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

39. Are there any errors or is critical information missing in Section 7.5?

- Yes
- No

40. Please provide comments on Section 7.5 that support your responses above:  
(4,000 character limit)

41. Please respond to the following statement regarding Section 7.6 - Process and Consultation:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 7.6 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

42. Are there any errors or is critical information missing in Section 7.6?

- Yes
- No

43. Please provide comments on Section 7.6 that support your responses above:  
(4,000 character limit)

## Section 8: Effectiveness of the Guidelines

Refer to Section 8, pages 39-42 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

44. Please respond to the following statement:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 8 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

45. Are there any errors or is critical information missing in Section 8?

Yes

No

46. Please provide comments on Section 8 that support your responses above:  
(4,000 character limit)

As noted in previous comments, Reclamation's management (and therefore determination of effectiveness under the Guidelines) is incomplete without inclusion of hydropower production data in this Report. Pages 39 and 40 highlight the importance of reservoir elevations and the interplay between the DCPs and the Guidelines. As noted above, the hydropower resource is a key aspect of the Upper Basin DCP, as well as Reclamation's Colorado River management and operations.

## Section 9: Summary

Refer to Section 9, page 42 of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf)  
([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftReport\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftReport_10-23-2020.pdf))).

47. Please respond to the following statement:

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section 9 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

48. Are there any errors or is critical information missing in Section 9?

Yes

No

49. Please provide comments on Section 9 that support your responses above:

*(4,000 character limit)*

The Report is intended to document "Reclamation's operational experience implementing Guidelines. This report provides Reclamation's retrospective evaluation of whether operations and actions specified by the Guidelines have adhered to common themes." Unless hydropower production information and data is included in the Report, as an integral part of the common themes, Reclamation's conclusion that the Guidelines were largely effective as measured against both their purpose and common themes is an incomplete conclusion.

## Appendix A - Operational Documentation

Refer to Appendix A of the Draft Report

([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftAppendixA\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf)  
([https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review\\_DraftAppendixA\\_10-23-2020.pdf](https://www.usbr.gov/ColoradoRiverBasin/documents/7.D.Review_DraftAppendixA_10-23-2020.pdf))).

50. Please respond to the following statement regarding Section A.2 - 24-Month Study Background:

|  |                                  |                       |                       |                       |                       |
|--|----------------------------------|-----------------------|-----------------------|-----------------------|-----------------------|
|  | Strongly<br>Agree                | Agree                 | Neutral               | Disagree              | Strongly<br>Disagree  |
| Section A.2 is clear and understandable. | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

51. Are there any errors or is critical information missing in Section A.2?

Yes

No

52. Please provide comments on Section A.2 that support your responses above:  
(4,000 character limit)

\*Page A-2: reinforces CREDA's comments requesting inclusion of hydropower production data with the description of the 24-month Study, an integral element of the Guidelines and any report on operations thereunder: "The 24-Month Study model output (monthly projected reservoir parameters including elevations, releases, and power generation) provide important information upon which stakeholders in the Basin may make decisions." \*Further, on Page A-4: "Upper Basin reservoir operations are manually input to the 24-Month Study model to meet objectives as outlined by each project's purpose." Hydropower is one of the authorized purposes of the Colorado River Storage Project Act (CRSPA) projects. \*On Page A-7: "the methods used in the 24-Month Study that compute energy generation from Hoover Dam were updated so that energy is produced until a Lake Mead elevation of approximately 950 feet." Clearly, energy production is a significant element of the 24-month Study and operations under the Guidelines. \*Please include hydropower production data in each of Tables A.1, A.2, and A.3, as well as each Year's Operational Determination Table.

53. Please respond to the following statement regarding Section A.3 - Review of Operations:

|                   |       |         |          |                      |
|-------------------|-------|---------|----------|----------------------|
| Strongly<br>Agree | Agree | Neutral | Disagree | Strongly<br>Disagree |
|-------------------|-------|---------|----------|----------------------|

|  | Strongly Agree        | Agree                 | Neutral                          | Disagree              | Strongly Disagree     |
|--|-----------------------|-----------------------|----------------------------------|-----------------------|-----------------------|
| Section A.3 is clear and understandable. | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

54. Are there any errors or is critical information missing in Section A.3?

- Yes
- No

55. Please provide comments on Section A.3 that support your responses above:  
(4,000 character limit)

\*Hydropower production data should be added to Appendix A. Experiments such as High Flow Experiments (HFEs), for example, would result in a change between projected energy output at the beginning of a water year, and actual operational experience. Likewise, reservoir elevation may result in different than projected energy output for a particular year. HFEs are reported in detail, including amount of water bypassed during each HFE. When water is bypassed, energy is not produced, so in the years that HFEs are reported, it is likely that energy production would be different from what was projected at the beginning of the year to that actually produced. Other specific comments: \*Page A-32: In 2011, equalization flows occurred. As the Report is not an analysis, the following sentence should be deleted: "Later analysis by the USGS Grand Canyon Monitoring and Research Center indicated that the high equalization releases scoured foundational sediment in the Grand Canyon, which provided additional concerns about how to implement equalization releases in future years." \*Page A-57: Inclusion of this text supports inclusion of additional hydropower production data in the Report and Appendix: "LC Dams office condensed their annual maintenance schedules in order to have all units available to pass all water through the turbines at Davis and Parker Dams to maximize hydropower generation." \*Page A-72: Suggest removing the bullet regarding an HFE. The Report should include actual operations, not "non-operations". As worded, the text implies that HFEs are automatic unless otherwise determined.

56. Please respond to the following statement regarding Section A.4 - 24-Month Study Accuracy:

| Strongly Agree | Agree | Neutral | Disagree | Strongly Disagree |
|----------------|-------|---------|----------|-------------------|
|----------------|-------|---------|----------|-------------------|

Strongly  
Agree

Agree

Neutral

Disagree

Strongly  
Disagree

Section A.4 is clear and understandable.

57. Are there any errors or is critical information missing in Section A.4?

Yes

No

58. Please provide comments on Section A.4 that support your responses above:

*(4,000 character limit)*