CVP Power Initiative Implementation Plan

Last Revised: 10/13/2021

Milestone	Action	Timeline	Target Completion	n Status	Completion Date	Lead Office	Lead PO
I. Reporting	and Implementation						
(I).1.a Provide	e a report of implementation to the Commissioner and Deputy Commissioners.		Ī			CVO	Melavic
(1).1.0. 1100100	e a report of implementation to the commissioner and bepaty commissioners.			Reclamation provided a coordinated action plan, complete with milestones, tasks and target completion dates for each		210	TVICIAVIC
	Develop a schedule with reporting milestones within 60 days of memo.	Within 60 days of memo	8/23/2019	directive on August 23. All information can be found here https://www.usbr.gov/mp/hydro.html.	8/23/2019		
(I) 1 h - Provide	le an implementation status report to the Commissioner and Deputy Commissioners.					CVO	Melavic
(i).1.b Flovide	e an implementation status report to the commissioner and beputy commissioners.					CVO	IVICIAVIC
	Provide an implementation status report of the action plan within 120 days of memo.	120 days of memo		This revised plan as of October 18, 2019 is the 120-day status report.	10/18/2019		
	Provide a status report every 6 months.	every 6 months		This revised plan as of May, 2020 and presented to the next customer forum (CCC), scheduled on June 2, 2020.	5/18/2020		
	Provide a status report every 6 months. Provide a status report every 6 months.	every 6 months every 6 months		This revised plan as of October, 2020 and presented to the next customer forum (CCC). This is the revised plan as of April, 2021 and will be presented to the next customer forum (CCC)	10/16/2020 4/15/2021		
	Provide a status report every 6 months. Provide a status report every 6 months.	every 6 months		1 This is the revised plan as of October 2021 and will be presented to the next customer forum (CCC)	4/15/2021		
	Provide a status report every 6 months.	every 6 months	4/8/2022				
II. Implemen	ntation - Cost Stability - Predictability and Transparency						
P							
(II).1.a Work \	with customers, WAPA and project proponent for Sites/North-of-Delta Off-Stream Storage (NO	DOS) Project on hydropower	purpose analysis.			MP-700	Vince Barba
	Discuss and using of homefite, posts, and financial improves accordated with the dueft forcibility.			Discussion Initiated in January 2010 systems of proceeding and agracing new systems of the reactive and other labeled in			
	Discuss analysis of benefits, costs, and financial impacts associated with the draft feasibility report's inclusion of a hydropower purpose to the proposed Sites/NODOS project with power			Discussion Initiated in January 2019 customer meeting and ongoing per customer request to receive updates. It has been decided that hydropower generation is no longer being used or considered as a benefit for NODOS and thus no longer in the			
	customers at Power Customer Coordination Committee (CCC) meeting.		1/15/2019	benefit calculation for Reclamation purposes.	3/13/2019		
			, , , , ,	This Item was discussed with Power customers on 2/11/2020 at the CCC Meeting and with WAPA/Sites Administrator.	-, -, -		
				Sites/NODOS is behind schedule due to manning issues. Sites is currently pursuing 2x paths with USBR as exchange customer			
				or investor. Results in FR are now out of date due to sponsor changing many facilities/configurations. Recent efforts have			
				removed hydropower generation as a claimed benefit from the NODOS project. As a result, no further hydropower modeling			
	Draft Lt-Gen hydropower purpose analysis for Sites/NODOS project discussion with power			has been reviewed. The Authority, under its new alternative, is producing new hydropower modeling, independently of Reclamation and will make this modeling available December 2020; however, this modeling is unlikely to impact any benefit			
	preference customers.		2/11/2019	9 analysis as hydropower generation is no longer being used in the benefit calculation for Reclamation purposes.	2/11/2020		
			, ,	The NODOS Feasibility Study is currently at OMB (9/18/2020) despite the Sites Authority reviewing different alternatives. USBR	· ·		
				expects a determination of feasibility by the Secretary around November 2020. The feasibility report will go forward using the	2 /2 /2 22		
	Submit administrative Final Feasibility Report to Commissioner's Office.		5/28/2020	2017 draft EIS/EIR that went out for public comment. The final EIS/EIR is to be completed by Spring 2022. The NODOS/Sites Reservoir Project was determined technically, economically, and financially feasible by the Secretary in	9/2/2020		
				December 2020. The alternatives under consideration have changed since that time, and Reclamation is preparing an			
				addendum to the Feasibility Report to present Reclamation's selected alternative. Sustainable hydropower generation was			
				previously a secondary objective of the project, but this objective has been dropped in the addendum (the benefit to cost ratio			
			- / · /	specific to this objective was less than one in feasibility-level studies for new hydropower facilities including pumpback			
	Submit administrative Final Environmental Impact Statement to Commissioner's Office. Participate in regular calls and discussions with Joint Power Authority to develop operations pla	n	5/1/2022	² capability). Generation of hydropower on the release of water is retained, but only for purposes of reducing the operating			
	proposal.	11	Ongoing	g Participating in Reservoir Committee and Executive Committee meetings.	Ongoing		
			, J	The NODOS/Sites Reservoir Project was determined technically, economically, and financially feasible by the Secretary in	J6		
				December 2020. The alternatives under consideration have changed since that time, and Reclamation is preparing an			
				addendum to the Feasibility Report to present Reclamation's selected alternative. Sustainable hydropower generation was			
				previously a secondary objective of the project, but this objective has been dropped in the addendum (the benefit to cost ratio specific to this objective was less than one in feasibility-level studies for new hydropower facilities including pumpback			
	Work with WAPA, customers and project proponents to finalize operations plan after			capability). Generation of hydropower on the release of water is retained, but only for purposes of reducing the operating			
	determination of feasibility.		Sometime in 2022	cost. A supplemental draft EIS/EIR will go out for public review August/September 2021. The final EIS/EIR is to be completed			
(II).1.b Comm	nunicate any modifications to the benefits analysis in the NODOS Feasibility Report to power cu	stomers and appropriate sta	keholders.			MP-700	Ryan Davis
-		1		This Item was discussed with Power customers on 2/11/2020 at the CCC Meeting and with WAPA/Sites Administrator.			
				Sites/NODOS is behind schedule due to manning issues. Sites is currently pursuing 2x paths with USBR as exchange customer			
				or investor. Results in FR are now out of date due to sponsor changing many facilities/configurations. Recent efforts have			
				removed hydropower generation as a claimed benefit from the NODOS project. As a result, no further hydropower modeling has been reviewed. The Authority, under its new alternative, is producing new hydropower modeling, independently of			
	Draft Lt-Gen benefits analysis for Sites/NODOS project for discussion with power preference			Reclamation and will make this modeling available December 2020; however, this modeling is unlikely to impact any benefit			
	customers.	<u> </u>	2/11/2019	analysis as hydropower generation is no longer being used in the benefit calculation for Reclamation purposes.	2/11/2020		
				The NODOS Feasibility Study is currently at OMB (9/18/2020) despite the Sites Authority reviewing different alternatives. USBR			
	Submit administrative Final Facilities Parant to Commission and Coffee		F 100 100-	expects a determination of feasibility by the Secretary around November 2020. The feasibility report will go forward using the	0 10 10 00		
	Submit administrative Final Feasibility Report to Commissioner's Office.		5/28/2020	2017 draft EIS/EIR that went out for public comment. The final EIS/EIR is to be completed by Spring 2022. The NODOS project was determined technically and financially feasibile by the Secretary in December 2020. Hydropower	9/2/2020		
				generation is limited to two 40MW generating facilities. A publicly available detailed project description is listed on			
				Sitesproject.orgA supplemental draft EIS/EIR will go out for public review August/September 2021. The final EIS/EIR is to be			
ī	Submit administrative Final Environmental Impact Statement to Commissioner's Office.		5/1/2022	2 completed by summer 2022.			

proposal.	n	Ongoing Participating in Reservoir Committee and Executive Committee meetings.	Ongoing		
Work with WAPA, customers and project proponents to finalize operations plan after		A draft term sheet describing proposed operations is in development. Upon completion of the term sheet and EIS/EIR, a WAPA			
determination of feasibility.		TBD 2022 Interconnection request will likely begin in 2022 as the project's operations plan and electrical requirements are further			
 II).1.c Work with non-federal cost share partners, preference power customers, WAPA and stakeholders for	<u> </u>	rpose analysis.		MPCO	Welsh
Provide Shasta Dam Raise updates at WAPA CCC meeting to ensure benefits, costs, and financial					
impacts associated with the draft Feasibility Report's inclusion of a hydropower purpose to the					
proposed project are analyzed, evaluated, and considered as the project moved forward.		8/22/2019 Complete.	8/22/2019		
		Lt-Gen and PLEXOS models have been evaluated by Reclamation. Lt-Gen model may be overpredicting generation and			
		therefore planning division proposed a regression approach to address the bias. They are currently migrating to a greater			
		focus on Lt-Gen for power modeling, instead of PLEXOS. Lt-Gen is being utilized to provide the power benefits due to			
Lt-Gen corrections for power benefits due/to-be-completed.		TBD unforeseen restrictions in the Plexos model. The Shasta Raise currently lacks support to move forward and is on hold until	ongoing	CGB 700	James Lu
Contract to be awarded to provide additional PLEXOS runs to improve hydropower benefits			- 1 - 1		
analysis.		11/1/2020 Contract awarded. Complete.	8/19/2019		
Complete revised benefits analysis		Benefits analysis will be provided at the power customer meeting following completion. Currently reviewing the modelling 4/1/2021 results of the revised benefits analysis. No new updates as of 3/19/2021			
Complete revised benefits analysis.		4/1/2021 results of the revised benefits analysis. No flew updates as of 3/19/2021			
 II).1.d Work with preference power customers and WAPA as appropriate on other feasibility studies.				MP-700	Vince Bar
inj. 1. d Work with preference power customers and WAFA as appropriate on other reasibility studies.		As reported at the power update provided at the October 10, 2019 CCC meeting, a Reclamation team has actively been		1011 - 700	VIIICE Dai
		analyzing the models LT Gen and Plexos to assess the level of accuracy appropriate for feasibility studies. Reclamation			
		continues to investigate opportunities to improve the physical and economic power benefit modeling in cooperation with			
Discuss as a part of Reclamation's "Power Update" at all Power Customer CCC meetings to		Federal and non-Federal partners. The source of power necessary to operate State-led storage projects will continue to be			
ensure the benefits, costs, and financial impacts associated with the inclusion of a hydropower		analyzed as operations plans and other regulatory requirements are drafted and finalized. Updates will be shared with			
purpose for proposed projects are analyzed, evaluated, and considered as projects move		Preference Power customers as necessary.			
forward.	Every power meeting	Ongoing	Ongoing	МРСО	Welsh
II) 1 d 1 If fooibility is appreciately determined and Congressional cuthorization precided for a preinst cut	aula voith mannamana M	VADA project promote protest contractors and stakeholders to develop detailed acceptions when			
II).1.d.1 If feasibility is appropriately determined and Congressional authorization provided for a project - w	ork with power customers, w	APA, project proponents, water contractors, and stakeholders to develop detailed operations plan.			
Modify appropriate internal directives to include outreach for stakeholders and power		Following release of Appraisal Study D&S (CMD 00 01) and Planning Policy (CMD D00). Poslamation will begin undates to CMD			
marketing agencies. Determine if additional outreach is required before feasibility is determined		Following release of Appraisal Study D&S (CMP 09-01) and Planning Policy (CMP P09), Reclamation will begin updates to CMP 09-02 in 2019. CMP 09-02 was revised on December 12, 2019. As D&S are updated, BOR will provide updates to CVP Power			
and add to appropriate directives and standards (if not already included).		7/31/2020 customers as relevant.	12/12/2019	84-55000	
Reclamation's Planning Office (MP-700) will begin coordination and development of detailed		7731/2020 customers as relevant.	12/12/2013	84-33000	
operations plan if and when feasibility is appropriately determined and Congressional					
authorization is provided for a project.	As needed basis.	Ongoing Work will occur if/when feasibility is determined for any proposed project.	Ongoing	MP-700	Vince Bar
The state of the s				700	1
II). 1.e Develop a Standard Operating Procedure (SOP) to document methodology and procedures for constr	uction cost recovery.			MP-3000	Lubas-Wi
		Reclamation met with the CVP FAC and determined the SOP will document what Reclamation will do to ensure repayment is			
Meet with CVP Financial Affairs Committee (FAC) to determine items for SOP.		7/19/2019 accomplished by 2030.	7/19/2019		
		An SOP was drafted and sent to FAC customers and WAPA for CVP Power customers for review. Customers provided feedback			
Develop draft SOP within 60 days of meeting with FAC.		9/17/2019 and BOR made necessary changes. As of 10/13/2020, The SOP is out for a second review.	9/18/2020		
Share draft SOP at next FAC meeting.		9/20/2019 Initial draft SOP was shared 9/18/2020. Revised SOP has been sent to FAC and WAPA customers.	9/18/2020		
•					
		Reclamation will share the final SOP for Construction Cost Recovery with Power customers at the Customer Meeting			
		immediately following the finalization of the SOP. Power customers have already received the most updated draft SOP. The	s /s /s ss		
Share draft SOP at WAPA CCC Customer Meeting.		·	6/9/2020		
	rojects	immediately following the finalization of the SOP. Power customers have already received the most updated draft SOP. The	6/9/2020	84.55000	Rill Taylo
Share draft SOP at WAPA CCC Customer Meeting. II).1.f Develop aid-to-irrigation document for Water Infrastructure Improvement for the Nation (WIIN) Act p	rojects.	immediately following the finalization of the SOP. Power customers have already received the most updated draft SOP. The	6/9/2020	84-55000	Bill Taylor
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	Reclamation submitted a memorandum to WAPA for approval, which proposes to establish a 10% variance threshold for			
Reclamation will seek customer and stakeholder input on appropriate variance percentage	budget and actual expenditures on multi-purposes O&M Construction Costs. Explanation of any exceedance beyond 10% will			
threshold. Ongoing.	10/31/2019 be provided by both agencies. The memorandum was submitted on 9/23/2020.	9/23/2020		
	Reclamation prepared a memorandum for WAPA for approval, which proposes to establish a 10% variance threshold for			
Determine appropriate variance percentage threshold between budgeted and actual	budget and actual expenditures on multi-purposes O&M Construction Costs. Explanation of any exceedance beyond 10% will			
expenditures for transparency of multipurpose O&M and construction costs. Ongoing.	1/13/2020 be provided by both agencies. The memorandum was drafted on 9/23/2020 and will be sent to WAPA for approval by the end	4/15/2021		
Document and share variance percentage commitment with power customers.	6/1/2020 This information will be shared at the CCC meeting immediately following finalization.	4/15/2021		
				+
II).1.j Implement benchmarking of CVP hydropower data and share annually.			cvo	Sand
	Reclamation continues to develop this report and will share when completed. Suggested metrics for the data shared with			
	customers via email. CVO Office shared Benchmarking data from 2016-2018 with Power customers in February 2020 at the TC			
Prepare preliminary report outlining results of cost and operational data for CVP generators.	10/31/2019 Meeting	2/6/2020		
	Results were shared at customer TC meeting in February 2020 following completion. This is an annual requirement and will			
Share results with Reclamation management and power customers.	10/31/2019 continue each year after benchmarking results are finalized.	2/6/2020		
Prepare and share report with Reclamation management and power customers annually. Annually.	10/31/2020 Results will be shared at TC meetings annually.	Ongoing		
II. Implementation - Lost Production Opportunities				
III).1.a Use best available science with plant bypass operations.			CVO	Kite
	Reclamation will continue to coordinate with the groups to use data for decision-making and to incorporate real-time			
	monitoring into decisions. Updates from these meetings are provided during customer meetings. In late October 2019,			
	Reclamation and WAPA's engagement with the American River group resulted in mitigating a proposed bypass of Folsom			
	Powerplant by applying available science. For Fall 2020 Reclamation is awaiting a power bypass proposal from the American			
Coordinate with the American River and Sacramento River groups when evaluating power plant	River Group. This proposal will be evaluated using current, relevant information and the best available science. Reclamation is			
bypass operations for species mitigation. Ongoing	Ongoing preparing a Bypass Initiative Framework document and will share with power customers when complete.	Ongoing		
// I Service Court II	Reclamation will continue to coordinate with the groups to use data for decision-making and to incorporate real-time	Ongoing		+
	monitoring into decisions. Updates from these meetings are provided during customer meetings. In late October 2019,			
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	Powerplant by applying available science. For Fall 2020 Reclamation is awaiting a power bypass proposal from the American			
Coordinate with American River and Sacramento River groups to ensure use of best available	River Group. This proposal will be evaluated using current, relevant information and the best available science. Reclamation is			
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Publish revised Hydropower Program Policy.	12/1/2019 FAC P04 was revised and published on 10/23/2019	10/23/2019	
(III).2.b Track and evaluate the performance of implemented procurement streamlining solutions.		PRO	Spiker
Develop specific benchmarks to measure cost savings by using new procurement tools.	Reclamation will share the benchmarks on the MP Power Website and in customer meetings. Reclamation continues to explore procurement streamlining solutions. A benchmark strategy was developed in November 2019. At this point the Tennessee Valley Authority interagency Agreement has not been utilized on CVP projects. We have coordinated with them on upcoming work and plan to have them onsite to look at the proposed projects. We are also working on additional contracts to help in the streamlining efforts.	Ongoing	
IV. Implementation - Value of Resource			
(IV).1.a Continued support for WAPA - Energy imbalance market (EIM)		CVO	Melav
	All initial hardware, software, and procedural needs for CVP participation in CAISO's Western Energy Imbalance Market (EIM) are in place. CVO has continued to work with WAPA and other partners on refinements of effective market operational strategies to capitalize on the flexibility of the CVP hydro resources in the EIM. CVP began live operations in the EIM at 0001 on March 25th, 2021. Hardware, software, and procedural needs for CVP participation in CAISO's Western Energy Imbalance Market (EIM) are functional and will evolve as operational experience and conditions dictate. Future updates on the economic performance of the EIM will generally be provided by the WAPA SNR office during their regular customer meetings. Future		
Continue to meet with customers to evaluate benefit and costs for implementation.	4/2019 - Ongoing updates on the economic performance of the EIM will generally be provided by the WAPA SNR office during their regular	Ongoing	
Continue coordination meetings with Reclamation, WAPA and BANC.	4/2019 - Ongoing Frequent meetings continue to occur between Reclamation, WAPA, and BANC.	Ongoing	
Continue to provide support for following WAPA determination on implementing EIM.	Public comment period on EIM ended on 8/16/19. On Aug 27, 2019, WAPA made a determination to move forward with their Ongoing Sierra Nevada Region's participation in EIM. Reclamation is continuing to support WAPA during implementation process.	8/27/2019	
		010	
(IV).1.b Explore water order schedules to allow for better forecasting of O'Neil Pump/Generation Plant operations and power demands.		CVO	Fox
Meet with SLDMWA, San Joaquin River Water Authority, and San Joaquin River Exchange Contractors to discuss option on improving O'Neil Operations.	Water customers (SLDMWA, San Joaquin River Water Authority, and San Joaquin River Exchange Contractors) have agreed to 6/12/2019 improve forecasting of operations at O'Neill Complete.	6/12/2019	
Share power economics data with water customers.	6/12/2019 Economics shared - Complete. A new process was developed and testing began in October 2019. The process includes transmitting daily pumping generation	6/12/2019	
Test the new process to transmit O'Neill and Tracy PUP schedules to the SLDMWA.	10/1/2019 schedules between CVO and SLDMWA. Denver IT approved direct transfer of data to SLDMWA in December 2019.	12/31/2019	
(IV).1.c Adopt principles outlined in framework on improved operational flexibility.			
Discuss as a part of Reclamation's "Power Update" at all Power Customer CCC meetings. Ongoing	Ongoing Power Update is provided at CCC meetings regularily.	Ongoing CVO	Mela
Evaluate proposals submitted by power customers to determine whether they should become part of standard operations.	USBR and WAPA explored scheduling flexibility for the Base Resource product to allow customers to realize higher value for the product. As a general rule, subject to generation holding load requirements, the customers' hourly scheduling limits for Base Resource will follow the market price trend. These scheduling flexibility enhancements have been instituted as standard operating process and have resulted in increased value of the Base Resource by allowing customers to schedule less energy in the low value hours and more energy in the high value hours.	Reference Region's hydropower website for graphic update presentation by WAPA. May, 2020	
Discuss as a part of Reclamation's "Power Update" at all Power Customer CCC meetings. Ongoing	Experiments are evaluated monthly and discussed regularly at Power Customer CCC meetings. CVO will continue to support 10/10/19 - Ongoing EIM and provide updates in coordination with WAPA as EIM is incorporated in operations.	Ongoing CVO	
(IV).2 Track schedule for California zero carbon and carbon neutral rulemaking process.			Bisho
	Reclamation is registered with California State list-serves responsible for SB-100 implementation and will receive updates as the rulemaking process continues. Reclamation's Power Resources Office will continue to work with the HPOC to keep awareness of this action. Reclamation supports Power Customer's desire to have large hydro count for renewable energy		
Reclamation's Power Resources Office will track the schedule for the California zero carbon and carbon neutral energy rulemaking process.	credits and understands the significance of this desire. No significant updates to SB-100/zero carbon goals. Reclamation has 9/1/2021 assisted trying to get Folsom PP approved for LIH Certification to further improve chances of some RECs for CVP Power.	Ongoing	
		Ongoing	
V. Implementation - Improved Customer Service		Ongoing	Melav
carbon neutral energy rulemaking process.		Ongoing	Mela
V. Implementation - Improved Customer Service	3/1/2021 assisted trying to get Folsom PP approved for LIH Certification to further improve chances of some RECs for CVP Power. The State of California continues to proceed with planning efforts for the Delta Conveyance Project. The state released the Notice of Preparation (NOP) for the new project. Reclamation submitted a comment letter that requested a clear delineation between the existing biological monitoring requirements and the monitoring requirements resulting from changes from system wide programs due to the addition of the Delta Conveyance Project; an initial plan that describes how DWR would operate the Delta Conveyance Project and comply with Federal Endangered Species Act requirements related to operations; and a detailed analysis of the effects of the Delta Conveyance Project on the CVP. From Reclamation's perspective, there is not	Ongoing Ongoing CVO	Mela

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Develop webpage that con	tains the (a) coordinated action plan, (b) biannual updates, (c)		1	ļ	
accomplishments, and (d) r	eference materials for the CVP Power Initiative.	6/24/2019 The webpage and all associated information can be found here: https://www.usbr.gov/mp/hydro.html - Complete.	6/24/2019		